Environmental Resources Management

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29 March 2006

Mr. Gregory B. MacLean, P.E.
Environmental Engineer 2
New York State Department of Environmental Conservation
Division of Environmental Remediation – Region 8
6274 East Avon-Lima Road
Avon, New York 14414

RE: Appendix B of the B2SA Final Engineering Report
BB2-14 Removal Action Report
755 Jefferson Road Facility - Henrietta, New York
NYSDEC VCP Number V00126-8
ERM Project Number 0040628

Dear Mr. MacLean:

Please find enclosed two copies of BB2-14 Removal Action Report documenting work recently performed at the Department's request in the BB2-14 Area at the UCB Manufacturing, Inc. (UCB) facility located at 755 Jefferson Road in the Town of Henrietta, Monroe County, New York (the Site). As previously approved by the New York State Department of Environmental Conservation (NYSDEC), Environmental Resources Management (ERM), on behalf of UCB, is submitting the enclosed report as Appendix B of the Building #2 Sump Area (B2SA) Final Engineering Report (FER) previously submitted to the Department for review and approval as outlined in the Voluntary Cleanup Agreement for the Site and the associated NYSDEC-approved Remedial Action Work Plan.

Subsequent to completion of the enclosed BB2-14 Removal Action Report, ERM is also enclosing a completed certification page for the B2SA FER signed and sealed by a New York-licensed Professional Engineer. Please insert the enclosed documents at the appropriate places in the B2SA FER previously submitted to NYSDEC and others in February 2006.

ERM, on behalf of UCB, looks forward to receipt of the Department's approval and comments on the B2SA FER at your earliest convenience.

Thank you for your assistance. Please contact me at 315-445-2554 or jon.fox@erm.com if you have any questions or comments regarding the enclosed documents.

Sincerely,

Jon S. Fox, P.G.
Senior Project Manager

Enclosures

Cc: Mr. Joseph Albert (MCDOH)
Ms. Charlotte Bethoney (NYSDOH)
Mr. Edward Hinchey, P.G. (ERM)
Mr. Jeffrey Hohman (UCB)
Mr. Bart Putzig, P.E. (NYSDEC)
Mr. Joseph Ryan, Esq. (NYSDEC)
Mr. Richard Wohaska, P.E. (ERM)

Report

Appendix B of the
B2SA Final Engineering Report

BB2-14 Area Removal Action
755 Jefferson Road Facility
Henrietta, New York

Voluntary Cleanup Program
Number V00126-8

29 March 2006

ERM Project Number 0040628

ENVIRONMENTAL RESOURCES MANAGEMENT
5788 Widewaters Parkway
Dewitt, New York 13214

TABLE OF CONTENTS

ACRONYMS AND ABBREVIATIONS

ASP	Analytical Services Protocol
B2SA	Building #2 Sump Area
bfs	below floor surface
CAMP	Community Air Monitoring Program
CRWP	Consolidated Remediation Work Plan
DUSR	Data Usability Summary Report
ERM	Environmental Resources Management
FER	Final Engineering Report
HASP	Health and Safety Plan
MCDES	Monroe County Department of Environmental Services
MCDOH	Monroe County Department of Health
mg/kg	milligrams per kilogram (parts per million)
mg/l	milligrams per liter (parts per million)
NYSDEC	New York State Department of Environmental Conservation
NYSDOH	New York State Department of Health
NYSDOL	New York State Department of Labor
NYSDOT	New York State Department of Transportation
OSHA	Occupational Safety and Health Administration
PID	Photoionization Detector
ppb	parts per billion
ppm	parts per million
QAPP	Quality Assurance Project Plan
RAWP	Remedial Action Work Plan
RSCO	Recommended Soil Cleanup Objective
SVOC	Semivolatile Organic Compound
TAGM	Technical and Administrative Guidance Memorandum
TAL	Target Analyte List
TCL	Target Compound List
UCB	UCB Manufacturing, Inc. (the Volunteer)
µg/kg	micrograms per kilogram (parts per billion)
µg/l	micrograms per liter (parts per billion)
USEPA	United States Environmental Protection Agency
VCA	Voluntary Cleanup Agreement
VCP	Voluntary Cleanup Program
VOC	Volatile Organic Compound

1.0 *INTRODUCTION*

Environmental Resources Management (ERM) performed investigation and remediation at the UCB Manufacturing, Inc. (UCB or the Volunteer) facility located at 755 Jefferson Road in the Town of Henrietta, Monroe County, New York (the Site). A map showing the location of the Site is presented in Figure 1. UCB's predecessor (Medeva Pharmaceutical Manufacturing Inc.) entered into a Voluntary Cleanup Agreement (VCA) with the New York State Department of Environmental Conservation (NYSDEC) in March 1998.

Several rounds of environmental investigation performed in the Building #2 Sump Area (B2SA) between 1996 and 2005 documented that several semivolatile organic compounds (SVOCs) of potential concern were present in soil in the vicinity of soil boring BB2-14 (designated the BB2-14 Area). A map showing the location of the BB2-14 Area within the B2SA is presented in Figure 2. The environmental investigations were primarily used for the development and refinement of a proposed remedial approach for the B2SA. NYSDEC originally approved a Remedial Action Work Plan (RAWP) for the Site on 19 December 2002 (NYSDEC, 2002). Investigations suggested that SVOCs detected in the B2SA, including the SVOCs in the BB2-14 Area, were associated with bituminous waterproofing material used in the construction and maintenance of Building #2 and were not associated with Site operations. Subsequent refinements to the proposed remedial approach for the B2SA were outlined in the B2SA Remedial Design Investigation (RDI) Report (ERM, 2004) and its Addendum Report (ERM, 2005), both of which were subsequently approved by NYSDEC on 26 July 2005 (NYSDEC, 2005). Remediation of the B2SA is addressed in the B2SA Final Engineering Report (ERM, 2006a).

When NYSDEC approved the B2SA RDI Report and its Addendum Report (NYSDEC, 2005), it recommended that a focused additional soil removal and sampling program be carried out in the BB2-14 Area. As requested by NYSDEC, soil removal and additional sampling were subsequently performed in the BB2-14 Area on behalf of the Volunteer in the interest of achieving closure without restriction under the VCA (or spell out Voluntary Cleanup Program prior to using the acronym). This report summarizes the results of this additional removal effort and is hereby submitted as Appendix B to the Final Engineering Report for the B2SA (ERM, 2006a) as approved by NYSDEC and outlined in ERM's correspondence dated 17 January 2006 (ERM, 2006b), 24 January 2006 (ERM, 2006c), and 25 January 2006 (ERM, 2006d). Copies of ERM (2006b), ERM (2006c), and ERM (2006d) are presented in Appendix B-1 of this report.

2.0 SUMMARY OF BB2-14 AREA SOIL REMOVAL ACTION

An excavation was installed at the location of former soil boring BB2-14 to remove soil from the vicinity of where several SVOCs had been detected in the sample previously collected from soil boring BB2-14 at a depth of zero to one foot below ground surface. A map showing the extent of the BB2-14 Area soil excavation and the locations of samples collected from the excavation is presented in Figure 3. A map showing the location of post removal confirmation surface samples (0 to 1 foot depth) relative to the BB2-14 Area excavation is presented in Figure 4.

ERM and its remedial subcontractor facilitated compliance with the following: the Volunteer's safe work procedures; NYSDEC, New York State Department of Health (NYSDOH), New York State Department of Labor (NYSDOL), and Occupational Safety and Health Administration (OSHA) requirements; appropriate materials specifications; and other applicable requirements typically applied to remedial construction projects. Air monitoring for volatile organic compounds (VOCs) and aerosols was performed during intrusive activities in accordance with the NYSDEC-approved Site-specific Health and Safety Plan and the Community Air Monitoring Program (ERM, 2002). A photographic log documenting selected features and components of the BB2-14 removal action is presented in Appendix B-2.

2.1 SOIL EXCAVATION AND SAMPLING

2.1.1 Site Preparation

Site preparation activities were performed on 8 November 2005. UCB personnel located, identified, and marked the location of subsurface utilities in the work area. A portion of the chain-link fence on the west side of Building #2 was removed to allow unfettered access to the BB2-14 work area.

2.1.2 Soil Excavation and Removal

Soil excavation and removal was performed on 8 November 2005 using a mini-excavator. Excavated soil was examined by an ERM geologist for visual and/or olfactory evidence of contamination and was also screened in the field for total VOCs using a calibrated photoionization detector (PID). Excavated soil was stockpiled adjacent to the excavation in a bermed area on top of a double layer of polyethylene sheeting. The

excavated soil pile was covered with another layer of polyethylene sheeting for temporary staging prior to subsequent off-site transport and disposal at a permitted disposal facility.

2.1.3 *Excavation Sampling*

Upon completion of soil excavation activities, soil sampling was performed in the excavation in conformance with sampling procedures outlined in the NYSDEC-approved Remedial Action Work Plan (RAWP). A total of five soil samples and one blind duplicate were collected at the locations show in Figure 3. Sample designations and other relevant information are summarized in Table 1. An ERM geologist described the samples for color, texture, odor, consistency, density, organic matter, moisture content, and other pertinent observations. Sample descriptions and other relevant information were recorded on ERM soil sample records (Appendix B-3).

All samples were transferred into laboratory-supplied sample jars and placed into a pre-chilled cooler for preservation and transport to the project laboratory. The samples were submitted to STL-Buffalo of Amherst, New York (STL-Buffalo) for analysis of SVOCs of potential concern as identified in the NYSDEC-approved RAWP. STL-Buffalo is a NYSDOH-approved environmental laboratory. ERM requested NYSDEC Analytical Services Protocol (ASP) Category B deliverables for all excavation soil samples. In accordance with NYSDEC requirements, validation of BB2-14 Area soil sample analytical data was performed and a Data Usability Summary Report (DUSR) was prepared for all excavation soil samples in conformance with NYSDEC guidelines. The DUSR for all BB2-14 Area soil samples is presented in Appendix B-4.

2.1.4 *Backfilling and Restoration*

Backfilling of the excavated area was accomplished to the pre-existing ground surface using clean granular fill material previously obtained by UCB for general use at the Site. Until backfilling was complete, access to the BB2-14 work area was restricted using the existing chain-link fencing supplemented with caution tape and orange plastic fencing.

2.2 *SURFACE SOIL SAMPLING*

NYSDEC subsequently requested the collection of additional soil samples in the vicinity of the BB2-14 soil excavation from ground surface to a

depth of two inches below ground surface (ERM, 2006b). Therefore, additional soil sampling was conducted on 27 January 2006. Four surface soil samples were collected in conformance with procedures outlined in the NYSDEC-approved RAWP and the correspondence from ERM to NYSDEC dated 17 January 2006 (ERM, 2006b). A total of four soil samples were collected at the locations show in Figure 4. Sample designations and other relevant information are summarized in Table 1. An ERM geologist described the samples for color, texture, odor, consistency, density, organic matter, moisture content, and other pertinent observations. Sample descriptions and other relevant information were recorded on ERM soil sample records (Appendix B-3).

All surface soil samples were transferred into laboratory-supplied sample jars and placed into a pre-chilled cooler for preservation and transport to STL-Buffalo for analysis of SVOCs of potential concern as identified in the NYSDEC-approved RAWP. ERM requested NYSDEC ASP Category B deliverables for all surface soil samples. In accordance with NYSDEC requirements, validation of laboratory analytical data associated with the surface soil samples was performed and a DUSR was prepared in conformance with NYSDEC guidelines (Appendix B-4).

2.3 *WASTE STREAMS*

2.3.1 *Excavated Soil*

The temporary soil staging area described above in Section 2.1.2 was used to temporarily stage soil excavated from the BB2-14 Area. Soil from this pile was subsequently transferred into four 55-gallon DOT-approved steel drums for eventual transport and disposal off Site as non-hazardous waste. Characterization of excavated soil as non-hazardous waste was determined as required by regulation and by the selected off-Site disposal facility using available laboratory analytical data from excavation soil samples and generator knowledge.

The four drums of excavated soil were picked up at the Site on 12 January 2006 by the Environmental Service Group, Inc. (ESG) of Tonawanda, New York and transported off Site for recycling at the American Recyclers Company in Tonawanda, New York (USEPA ID Number NYR000030809). ESG is a NYSDEC Part 364-permitted waste hauler (USEPA ID Number NYD986903904). The shipment of excavated soil from the Site was accompanied by a non-hazardous waste manifest (Appendix B-5).

2.3.2 *Personal Protective Equipment and Other Solid Waste*

Soil excavated from the BB2-14 area was determined to be a non-hazardous waste as described above in Section 2.3.1. Therefore, personal protective equipment (PPE), polyethylene sheeting, disposable sampling equipment, and other materials that came into contact with excavated soil were also determined to be non-hazardous waste. Therefore, PPE, disposable sampling equipment, polyethylene sheeting, and other materials that came into contact with excavated soil from the BB2-14 Area were placed into routine facility waste dumpsters along with the facility's routine municipal-type wastes as approved by NYSDEC in the RAWP for the Site.

3.0 RESULTS

3.1 SOIL EXCAVATION AND SAMPLING

Action levels for VOCs and aerosols listed in the HASP and CAMP for the Site were not exceeded during the BB2-14 removal action. Soil excavated from the BB2-14 Area consisted predominantly of homogenous, soft, medium brown sandy gravel with lesser amounts of fine-grained soil (Appendix B-2). Moisture content was generally moist and the material generally possessed no distinct odor. Distinct, globular masses of black, bituminous-like material consistent with the bituminous material used as waterproofing beneath and around Building #2 were plainly visible in excavated material from the BB2-14 Area (see Appendix B-2).

Table 2 presents a summary of validated laboratory analytical data for SVOCs of potential concern. As expected, several SVOCs were detected in the soil samples collected from the excavation at concentrations above Site-specific Recommended Soil Cleanup Objectives (RSCOs) contained in the NYSDEC-approved RAWP. The detected concentrations of SVOCs in the excavation samples are generally consistent with previous laboratory analytical results for other samples collected in the B2SA as documented in Table 3-1 of the B2SA RDI Report (ERM, 2004). See, for example, the SVOC results for samples Base 24, Base 25, and BB2-11 on Table 3-1 of that Report. As outlined in the B2SA RDI Report (ERM, 2004), its Addendum Report (ERM, 2005), subsequent conversations with NYSDEC and NYSDOH, and Section 3.3 of the B2SA FER, the SVOCs detected in B2SA soil samples are derived from the bituminous waterproofing material and are therefore associated with construction activities, not Site operations. NYSDEC and NYSDOH previously indicated that additional investigation or remediation of construction-related compounds will not be required at this Site (ERM, 2006c).

3.2 SURFACE SOIL SAMPLING

As expected, several SVOCs were detected in the surface soil samples collected around the BB2-14 excavation at concentrations above Site-specific RSCOs contained in the NYSDEC-approved RAWP. The suite and concentrations of SVOCs detected in the BB2-14 Area surface soil samples are generally consistent with previous laboratory analytical results for other samples collected in the B2SA as documented in Table 3-1 of the B2SA RDI Report (ERM, 2004). The only known/reported spills/releases from the diesel tank were reported to NYSDEC. A 1991

release of 40 gallons reportedly occurred inside the fence line due to an equipment failure. The spill was largely contained, although some diesel fuel reportedly seeped through cracks in concrete to soil. The affected soil was excavated at that time and disposed of at a permitted facility off-site. According to NYSDEC records, the Department closed its file on this spill on 28 June 1991.

Bituminous-like material is plainly visible in soil in and around the BB2-14 excavation area (see photographs in Appendix B-2) Additionally, while this area is currently not black topped, this fenced-in utility area is located adjacent to a large black-topped parking area that begins on the south end of Building #2 and the fenced in utility area and extends further south. Because of the obvious presence of bituminous-like material in soil and its proximity to a large blacktopped area, the detection of SVOCs such as those often found associated with black-top in very shallow soils is not unexpected. During the call between ERM, representatives of UCB, NYSDEC, and NYDOH on 24 January 2006, both agencies indicated that they would not expect further investigation and/or remediation in the event that the SVOCs were likely attributable to blacktop, bituminous waterproofing material, or other construction related material. Further, during that call both agencies also agreed that finding SVOCs from these sources in shallow (or deeper) soil at concentrations above the RSCOs was not unexpected.

As described above in Section 3.1 and in Section 3.3 of the B2SA FER (ERM 2006a), SVOCs detected in BB2-14 Area samples are derived from the bituminous waterproofing material and are therefore associated with construction activities, not Site operations. NYSDEC and NYSDOH previously indicated that remediation of construction-related compounds will not be required at this Site (ERM, 2006c). Therefore, additional investigation or remediation of SVOCs in the BB2-14 Area is not warranted nor should these results keep the Site from receiving a "clean release" at the end of the remedial process.

3.3 WASTE STREAMS

3.3.1 Excavated Soil

A total of four drums of excavated soil were removed from the BB2-14 Area and transported off Site for proper disposal (Appendix B-5). The total mass of soil excavated and transported off Site from the BB2-14 Area is estimated at approximately 2000 pounds (one ton).

3.3.2 *Personal Protective Equipment and Other Solid Waste*

ERM estimates the total mass of non-hazardous PPE disposable sampling equipment, plastic sheeting, or other materials that came into contact with excavated soil and associated waste that was placed into facility dumpsters was approximately 10 pounds.

3.4 *CONCLUSIONS*

The SVOCs found in the shallow soils in the BB2-14 area are the same types of SVOCs which have been found elsewhere on site. The sources of these SVOCs are likely to be the use, during construction of the building, of bituminous waterproofing material as a coating on in-ground structures.

There were no visible indications of any significant releases of diesel fuel in this area, and the only known release of diesel fuel in this area was cleaned up to NYSDEC's satisfaction in 1991. Bituminous-like material consistent with the material used during construction of Building #2 is present in excavated soil and in the excavation walls and floor. The SVOCs found are also similar to SVOCs found in blacktopping and blacktop sealant which are other common bituminous construction products.. A large blacktopped area is present in relatively close proximity to the BB2-14 area. This blacktopping may also be a source of the SVOCs found in the very shallow (surface to 4 inch deep) samples.

The BB2-14 area is fenced and is not routinely occupied; thus, there should be no routine exposure to shallow soils in this area.

NYSDEC and NYSDOH previously indicated that remediation of construction-related compounds will not be required at this Site. Furthermore, both agencies agreed that the finding of SVOCs in the soil at levels at or above the RSCOs attributed to construction or bituminous-like materials will not prevent the site from receiving a "clean release" at the end of the remediation (ERM, 2006c).

Based upon this removal action and the findings discussed in this report, additional investigation or remediation of SVOCs in the BB2-14 Area is not warranted.

4.0 REFERENCES CITED

ERM, 2002. Consolidated Remediation Work Plan – 755 Jefferson Road Facility, Henrietta, New York: NYSDEC VCP Number V00126-8; Environmental Resources Management, DeWitt, New York, April 2002.

ERM, 2004. Building #2 Sump Area Remedial Design Investigation Report – 755 Jefferson Road Facility, Town of Henrietta, Monroe County, New York. NYSDEC VCP Number V00126-8; Environmental Resources Management, DeWitt, New York, July 2004.

ERM, 2005. Addendum to the Building #2 Sump Area Remedial Design Investigation Report – 755 Jefferson Road Facility, Town of Henrietta, Monroe County, New York. NYSDEC VCP Number V00126-8; Environmental Resources Management, DeWitt, New York, April 2005.

ERM, 2006a. Building #2 Sump Area Final Engineering Report – 755 Jefferson Road Facility, Town of Henrietta, Monroe County, New York. NYSDEC VCP Number V00126-8; Environmental Resources Management, DeWitt, New York, February 2006.

ERM, 2006b. E-mail correspondence to NYSDEC dated 17 January 2006 summarizing a teleconference with NYSDEC on 4 January 2006 regarding an NYSDEC request for additional soil sampling, analysis, and reporting in the BB2-14 Area - 755 Jefferson Road Facility, Town of Henrietta, Monroe County, New York. NYSDEC VCP Number V00126-8; Environmental Resources Management, DeWitt, New York.

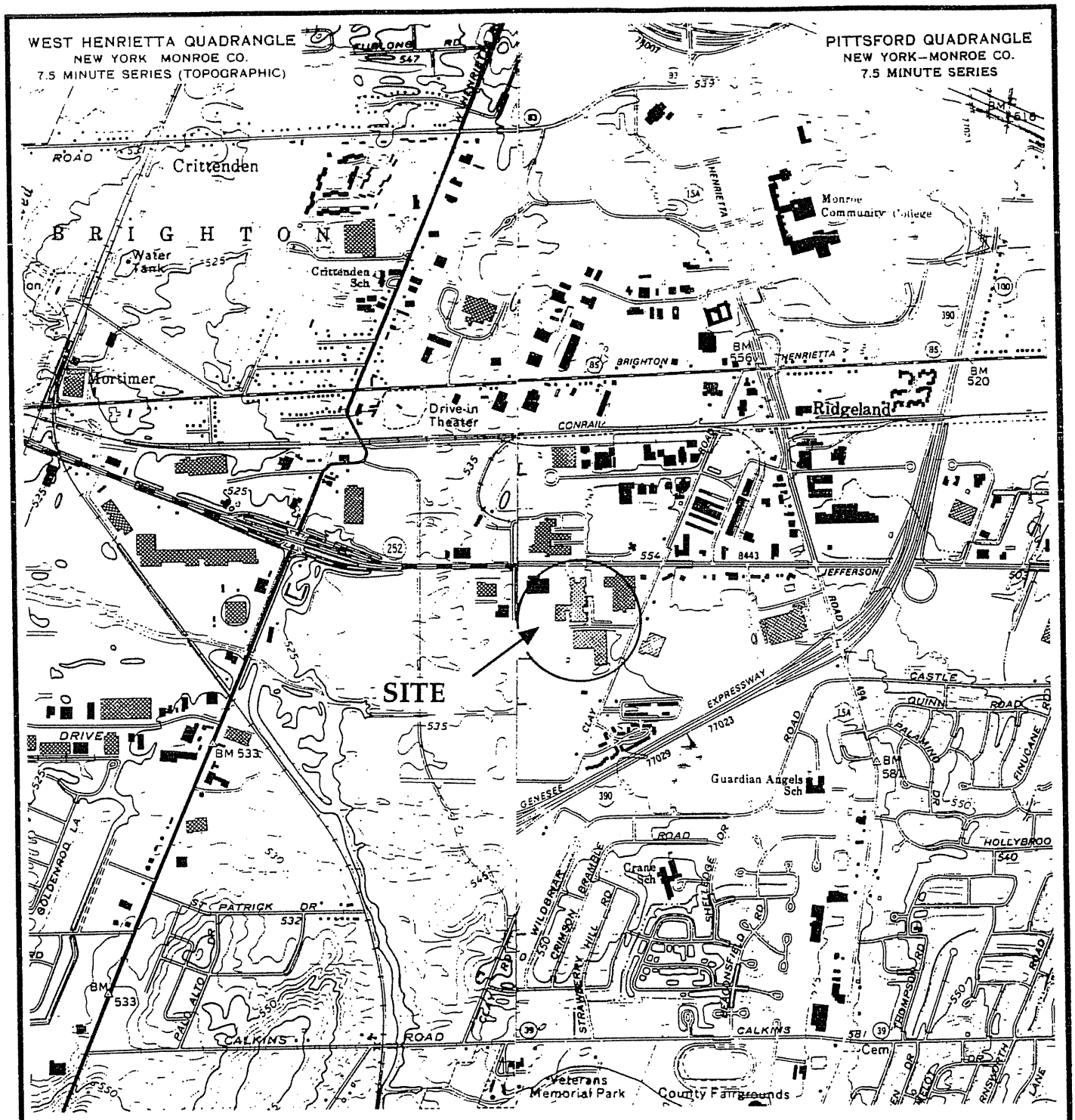
ERM, 2006c. E-mail correspondence to NYSDEC dated 24 January 2006 summarizing a teleconference with NYSDEC and NYSDOH on 24 January 2006 documenting recent understandings and agreements regarding additional soil sampling, analysis, and reporting in the BB2-14 Area - 755 Jefferson Road Facility, Town of Henrietta, Monroe County, New York. NYSDEC VCP Number V00126-8; Environmental Resources Management, DeWitt, New York.

ERM, 2006d. E-mail correspondence to NYSDEC dated 25 January 2006 providing notice of surficial soil sampling and a summary of recent conversations and understandings with NYSDEC and NYSDOH regarding the BB2-14 Area - 755 Jefferson Road Facility, Town of Henrietta, Monroe County, New York. NYSDEC VCP Number V00126-8; Environmental Resources Management, DeWitt, New York.

NYSDEC, 2002. Correspondence to Celltech Manufacturing, Inc. dated 19 December 2002 regarding NYSDEC approval of the Remedial Action Work Plan for the 755 Jefferson Road Site, Henrietta, New York. Mr. Bartholomew Putzig, P.E., NYSDEC Region 8, Avon, New York.

NYSDEC, 2005. Correspondence to UCB Manufacturing, Inc. dated 26 July 2005 regarding NYSDEC approval of the Building #2 Sump Area Remedial Design Investigation Report dated July 2004 and its Addendum Report dated 5 April 2005. 755 Jefferson Road Site, Henrietta, New York. Mr. Gregory B. MacLean, P.E., NYSDEC Region 8, Avon, New York.

Figures

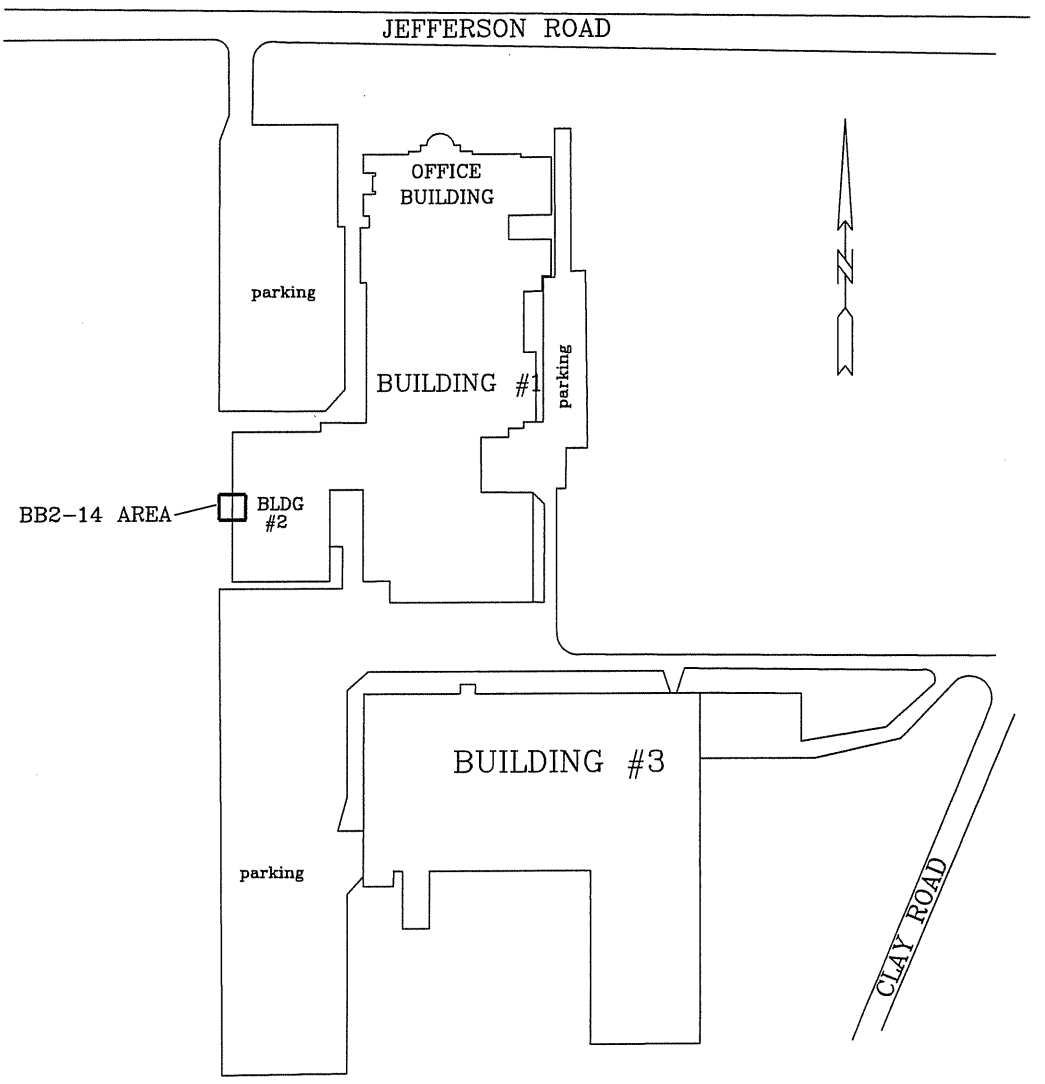


SITE LOCATION MAP
JEFFERSON ROAD FACILITY
HENRIETTA, NY

PREPARED FOR
JEFFERSON ROAD FACILITY

ERM

SCALE	FIGURE
NTS	1
DATE 1-97	



SITE LAYOUT MAP AND BB2-14 AREA
755 JEFFERSON ROAD FACILITY
HENRIETTA, NEW YORK

PREPARED FOR
755 JEFFERSON ROAD FACILITY

ERM
5788 WIDEWATERS PARKWAY
DEWITT, NEW YORK 13214

SCALE	FIGURE
NTS	2
DATE	
02-13-06	

N

LEGEND:

SURVEYED PROPERTY LINE

CHAIN LINK FENCE

PROXIMAL EXCAVATION LOCATION

▲ CS-03 CONFIRMATION SOIL SAMPLE LOCATION & DESIGNATION

LABORATORY

BUILDING #2
BASEMENT

STORAGE ROOM

STAIRWAY TO FIRST FLOOR

BUILDING
EXTERIOR WALL

WEST PROPERTY LINE
N 01°15'24" W

CS-04
CS-02
CS-05
CS-03
CS-01

ROOM #24

SUMP-24

HALLWAY

ROOM #25

EXISTING
NEUT. TANK

BUILDING #2
FIRST FLOOR

6 3 0 6
SCALE IN FEET

EXTENT OF REMEDIAL SOIL EXCAVATION
AND CONFIRMATION SOIL SAMPLES
NYSDEC VCP#V00126-8

PREPARED FOR
755 JEFFERSON ROAD FACILITY

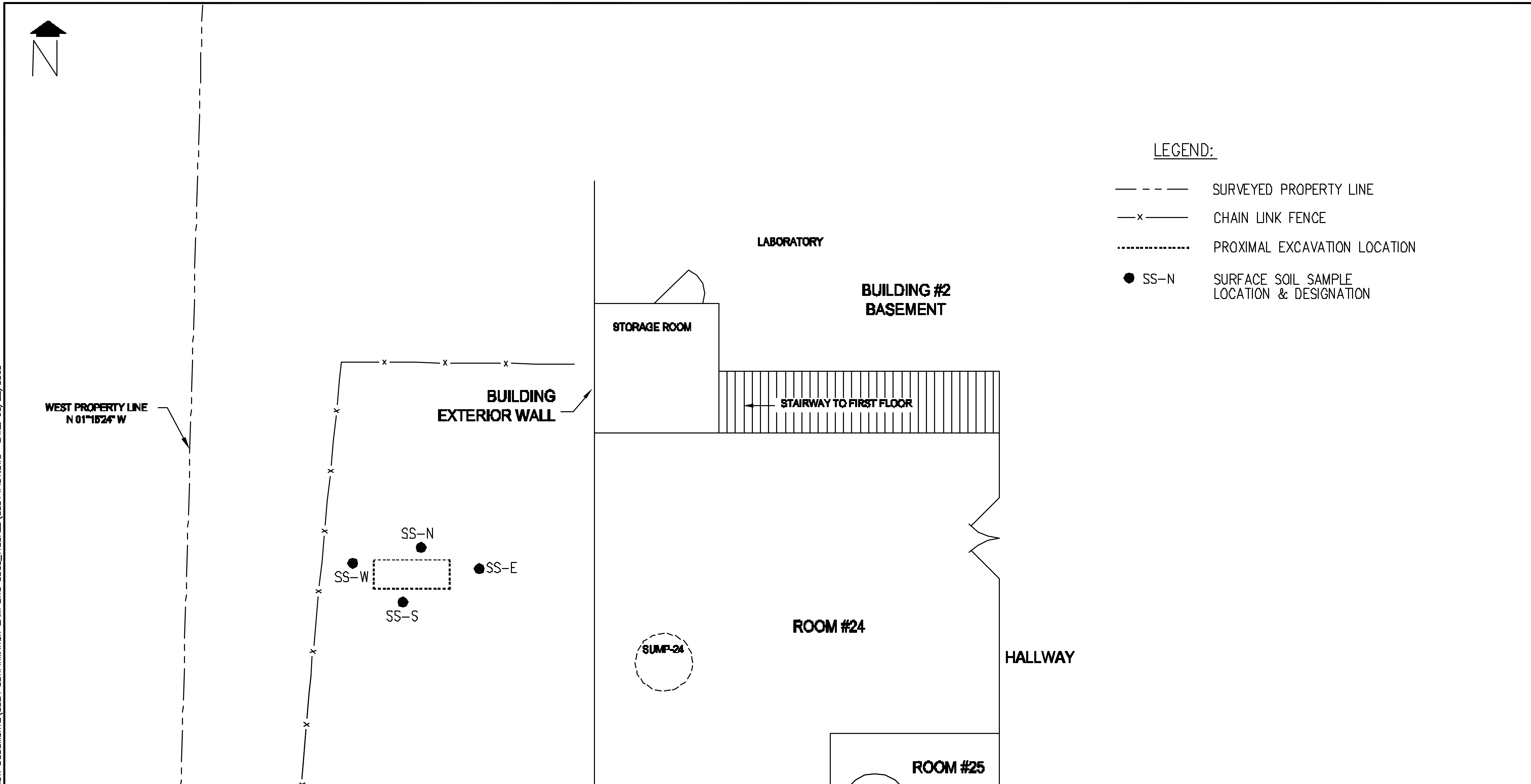
ERM
5788 WIDEWATERS PARKWAY
DEWITT, NEW YORK 13214

SCALE 1"=6'

DATE 02-13-06

FIGURE 3

G:\CLIENT\AVENTIS-JEFFERSON ROAD\B2SA EXECUTION DOCUMENTS\B2SA CONFIRMATION SAMPLING DOCS_FIGURES\BB214FIG3.DWG DATE: 03/02/2006



AREA SURFACE SOIL SAMPLES
NYSDEC VCP#V00126-8

PREPARED FOR
755 JEFFERSON ROAD FACILITY

ERM
5788 WIDEWATERS PARKWAY
DEWITT, NEW YORK 13214

SCALE 1"=6'
DATE 02-13-06
FIGURE 4

Tables

TABLE 1
SUMMARY OF SOIL SAMPLES
BB2-14 AREA REMOVAL ACTION
755 JEFFERSON ROAD FACILITY - HENRIETTA, NEW YORK
NYSDEC VCP NUMBER V00126-8
ERM PROJECT NUMBER 0040628

SAMPLE IDENTIFICATION	SAMPLE DATE	SAMPLE DEPTH	SVOCs	COMMENTS
CS01	11/8/05	18.5	X	Confirmation sample - south wall
CS02	11/8/05	24	X	Confirmation sample - excavation bottom
CS03	11/8/05	16	X	Confirmation sample - east wall
CS04	11/8/05	15	X	Confirmation sample - north wall
CS05	11/8/05	19	X	Confirmation sample - west wall
CS06	11/8/05	19	X	Blind duplication of sample CS05
SS-S	1/27/06	0-2	X	Surface sample south of excavation
SS-E	1/27/06	0-2	X	Surface sample east of excavation
SS-W	1/27/06	0-2	X	Surface sample west of excavation
SS-N	1/27/06	0-2	X	Surface sample north of excavation

NOTES:

- Sample depth is reported in inches below surface at the location of the soil boring.
- SVOCs = semivolatile organic compounds by USEPA Method 8270.
- Additional volume collected with CS01 for matrix spike / matrix spike duplicate

TABLE 2
SUMMARY OF LABORATORY ANALYTICAL DATA
BB2-14 AREA REMOVAL ACTION
755 JEFFERSON ROAD FACILITY - HENRIETTA, NEW YORK
NYSDEC VCP NUMBER V00126-8
ERM PROJECT NUMBER 0040628

soil boring	SITE-	CS01	CS02	CS03	CS04	CS05	SS-S	SS-E	SS-W	SS-N
sample depth (inches)	SPECIFIC	18.5	24	16	15	19	0-2	0-2	0-2	0-2
date sampled	RSCO	11/8/06	11/8/06	11/8/06	11/8/06	11/8/06	1/27/06	1/27/06	1/27/06	1/27/06
SVOCs (ug/kg)										
benzo (a) anthracene	224 or MDL	420	240 J	1000	540	87 J	6400	3400 J	2800 J	6200 J
benzo (b) fluoranthene	269	510	290 J	1400	640	120 J	8700	5500	4300	8300 J
benzo (k) fluoranthene	269	190 J	110 J	1500	250 J	39 J	2100 J	5700	990 J	2300 J
benzo (a) pyrene	61 or MDL	370 J	220 J	780	480	80 J	5900	3300 J	2800 J	6200 J
chrysene	98 or MDL	400	220 J	940	500	91 J	6800	3200 J	3000 J	6100 J

NOTES:

---- = not detected above the laboratory detection limit.
- RSCO = Site-specific Recommended Soil Cleanup Objective for unrestricted use.
- SVOCs = semivolatile organic compounds by USEPA Method 8270
- NA = not applicable.
- ug/kg = micrograms per kilogram.
J = indicates an estimated value.
- MDL = method detection limit.

Appendix B-1
Salient Correspondence to NYSDEC

Jon Fox

01/17/2006 03:34 PM

To: gbmaclea@gw.dec.state.ny.us
cc: Jeffrey.Hohman@ucb-group.com, Dave.Panipinto@ucb-group.com, lford@nixonpeabody.com, cmb18@health.state.ny.us, bxputzig@gw.dec.state.ny.us, jalbert@monroecounty.gov,
Subject: BB2-14 Area Additional Soil Sampling - 755 Jefferson Road Facility, Henrietta, NY
NYSDEC VCP# V00126-8

Hello Greg

Based on our telephone conversation on 4 January 2006, ERM understands that NYSDEC is requesting collection of four surficial soil samples around a small area that was recently excavated by UCB at NYSDEC's request in the vicinity of soil boring BB2-14 at the above-referenced Site. It is our understanding that NYSDEC is requesting collection of these four additional soil samples for further evaluation of surficial soil quality in this area.

It is also our understanding that NYSDEC wants these samples collected from ground surface to two inches below ground surface on each side of the former excavation (total of four samples) and analyzed for semivolatile organic compounds (SVOCs) of potential concern as listed in the NYSDEC-approved Remedial Action Work Plan (RAWP) as well as any other Site-related contaminants that were previously found at this location at concentrations above the Site-specific Recommended Soil Cleanup Objectives (RSCOs) contained in the RAWP. ERM reviewed laboratory analytical results for the surficial soil sample previously collected from soil boring BB2-14 from zero to 1-foot below ground surface. Inorganic elements were not detected in this sample at concentrations above the numerical Site-specific RSCOs with the exception of 0.64 mg/kg of beryllium. The Site-specific RSCO for beryllium is 0.16 mg/kg or "non-detect". However, as previously approved by NYSDEC based on analytical data and technical justification contained in the Building #2 Sump Area (B2SA) Remedial Design Investigation (RDI) Report dated July 2004 and its Addendum Report dated April 2005, the detected concentration of beryllium in this sample is consistent with typical practical quantitation limits (i.e., detection limits) for other soil samples collected from this Site and is not of environmental concern. Therefore, ERM proposes that if this additional confirmatory soil sampling is done, then analysis for inorganic elements of potential concern is not necessary for this additional sampling effort based on existing analytical data and NYSDEC's approval of the B2SA RDI Report and its Addendum Report.

UCB has advised ERM that they are willing to authorize the collection and analyses of the requested additional soil samples based on the understanding that if, as expected, SVOCs related to the bituminous waterproofing material used in on-Site construction are detected in this shallow soil at levels not materially different from those found elsewhere on-Site, the Final Engineering Report (FER) for the B2SA would be approved by NYSDEC without an industrial use-only deed restriction being placed on this portion of the Site. As the brief report on the BB2-14 area soil testing and removal project will document, globules of a black tar-like material similar in appearance to the bituminous material previously found within and beneath the Building #2 floor slab, in sub-floor drains, etc., were observed in soil that was removed. The soil removed was also near a pipeline and a concrete pad. As outlined in the B2SA RDI Report and its Addendum Report, both of which are part of the NYSDEC-approved RAWP for the Site, SVOCs detected in soil in this area are associated primarily with the bituminous waterproofing material used during building construction and maintenance, not with Site operations. Investigation or remediation of construction-related compounds is not contemplated in the Voluntary Cleanup Agreement for this Site, and the additional work requested by NYSDEC in association with BB2-14 is not contained in the NYSDEC-approved RAWP. Libby Ford, representing UCB, and I would like to have a short conference call with you to discuss this understanding, and whether the Department has any disagreement with this concept.

Assuming that an agreement can be reached on this issue, ERM will collect the requested additional data if you still feel it is necessary. ERM will also prepare a brief letter report on the BB2-14 soil investigation and removal action. In order not to delay the submittal of the draft B2SA FER, it is proposed that the text of the draft FER reference that, at the Department's suggestion, the additional investigation and soil removal was carried out. We also propose that the draft FER text will cross-reference an appendix that

will contain a letter report on the BB2-14 removal action. The appendix will not be submitted with the draft FER but instead will be submitted with the final FER after the results of the additional testing are available and all the results from this project have been integrated into the report.

Thank you for your assistance. I will be contacting you shortly to set a time to discuss the above-proposed approach.

Regards,
Jon

Jon S. Fox, P.G.
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5788 Widewaters Parkway
DeWitt, New York 13214 USA
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315-445-2543 (facsimile)
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Jon Fox
01/24/2006 05:23 PM

To: gbmaclea@gw.dec.state.ny.us, cmb18@health.state.ny.us
cc: bxputzig@gw.dec.state.ny.us, lford@nixonpeabody.com, Jeffrey.Hohman@ucb-group.com, Dave.Panipinto@ucb-group.com, Ed Hinchey/ERMNE/ERM@ERM, Richard
Subject: BB2-14 Area Teleconference Summary - NYSDEC VCP# V00126-8

Hello Greg and Charlotte

Libby Ford and I have prepared this summary to document our understandings and agreements derived from the teleconference earlier today.

Participants: Charlotte Bethoney (CB-NYSDOH), Greg MacLean (GM-NYSDEC), Bart Putzig (BP-NYSDEC), Libby Ford (LF-Nixon-Peabody for UCB), Jon Fox (JF-ERM), Mike Bogdan (sanofi-aventis - listened in only).

Overview:

During the BB2-14 area soil testing and removal project performed on 8 November 2005, globules of a black tar-like material similar in appearance to the bituminous waterproofing material previously found within and beneath the Building #2 floor slab, in sub-floor drains, etc., were observed in soil that was removed. The soil removed was also near a pipeline and a concrete pad. As outlined in the B2SA RDI Report and its Addendum Report, SVOCs detected in soil in this area are associated with the bituminous waterproofing material used during building construction and maintenance, not with Site operations. NYSDEC initially recommended this soil investigation and removal be performed due to concerns that SVOCs detected in this area could come from diesel oil releases and not from the waterproofing material.

We believe that if SVOCs related to the bituminous waterproofing material used in on-Site construction are detected in this shallow soil at levels not materially different from those found elsewhere on-Site, the Final Engineering Report (FER) for the B2SA should be approved without an industrial use-only deed restriction being placed on this portion of the Site. Investigation or remediation of construction-related compounds is not contemplated in the Voluntary Cleanup Agreement for this Site.

If we do shallow confirmatory sampling, we expect to detect SVOCs, and at least some of them are likely to be above the Site-specific Recommended Soil Cleanup Objectives (RSCOs) contained in the NYSDEC-approved Remedial Action Work Plan (RAWP). However, we believe that the SVOCs are due to the waterproofing material and are likely to be found at levels similar to that found beneath and near by blacktopped roads and parking lots, similar to what the United States Geological Survey (USGS) found in the article on polycyclic aromatic hydrocarbons (PAHs) from parking lot run-off that it reported on in the 8/05 issue of Environmental Science and Technology.

Discussion:

GM - Our concern is if you have SVOCs in shallow soils above the clean-up standards, humans could be exposed to them.

CB -- The concern is that you are looking for a "clean" release. NYSDOH still has a problem with the levels in the shallow soil. However, we also realize that similar levels are likely to be found near roadways and where similar construction material was used. Can you document that the material you observed was the same waterproofing type material?

JF - We did the same analyses for SVOCs by USEPA Method 8270 as we did for are other confirmatory sampling. We did not analyze these samples by the high resolution fingerprinting method.

CB - I think I can turn this into a short call. My management has indicated that we will not require

additional remediation for waterproofing and other construction-related material. If this site was going to be turned into a playground for a daycare we might. But the site is remaining commercial.

LF - So this means that these results will not keep the site from earning a clean release?

CB - Greg?

BP - If the agencies are in agreement that the source of the SVOCs is building material, then this should not prevent a clean release. Because of the main area [i.e. the MCA], the release probably won't come for a number of years.

LF–Will there be a release for the B2SA portion of the site after the B2SA FER is approved?

GM - Typically we only issue one release when the entire site is cleaned up. We will approve the B2SA FER when its completed, but we won't issue the final release until the entire project is done. In limited areas, such as where a portion of a remediation site is being sold, we will issue a release for that portion of the site even if the remediation of the rest of the site has not been completed.

LF–Based on this understanding, ERM can do the additional sampling you all requested.

JF- ERM requests confirmation of the acceptability of submitting the draft FER mentioning the BB2-14 work, but only including a "placeholder" appendix for the report at this time. The BB2-14 report will be submitted and incorporated into the FER after the additional sampling work and laboratory analysis has been completed. GM agreed, but repeated that the FER would not be approved until the BB2-14 report had been submitted.

Thank you for your assistance. Please contact Libby or me if you have any questions or comments.

Regards,
Jon

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315-445-2543 (facsimile)
jon.fox@erm.com

Jon Fox
01/25/2006 04:39 PM

To: gbmaclea@gw.dec.state.ny.us
cc: Jeffrey.Hohman@ucb-group.com, Dave.Panipinto@ucb-group.com, lford@nixonpeabody.com, cmb18@health.state.ny.us, bxputzig@gw.dec.state.ny.us, jalbert@monroecounty.gov,
Subject: BB2-14 Area Soil Sampling @ 755 Jefferson Rd. Site, Henrietta, NY NYSDEC VCP# V00126-8

Hello Greg

Per our additional telephone discussions after yesterday's teleconference, please be advised that ERM will be collecting four additional surficial soil samples at the UCB facility on Friday, 27 January 2006. The soil samples will be collected and analyzed as described in the e-mail from ERM to NYSDEC dated 17 January 2006. The samples will be analyzed at the project laboratory (STL-Buffalo) for SVOCs of potential concern by EPA-8270 using NYSDEC's Analytical Services Protocol with Category B deliverables. ERM understands that additional sampling or analysis is not required.

We hope to submit the B2SA FER for review by the end of next week. We also hope to submit the letter report for the BB2-14 area (which will be placed into the B2SA FER as an appendix at the indicated location) by the end of February 2006.

Thanks for your assistance. Please contact me if you have any questions or comments.

Regards,
Jon

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Jon Fox

Jon Fox
01/24/2006 05:23 PM

To: gbmaclea@gw.dec.state.ny.us, cmb18@health.state.ny.us
cc: bxputzig@gw.dec.state.ny.us, lford@nixonpeabody.com, Jeffrey.Hohman@ucb-group.com, Dave.Panipinto@ucb-group.com, Ed Hinchey/ERMNE/ERM@ERM, Richard Wohaska/ERMNE/ERM@ERM
Subject: BB2-14 Area Teleconference Summary - NYSDEC VCP# V00126-8

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Participants: Charlotte Bethoney (CB-NYSDOH), Greg MacLean (GM-NYSDEC), Bart Putzig (BP-NYSDEC), Libby Ford (LF-Nixon-Peabody for UCB), Jon Fox (JF-ERM), Mike Bogdan (sanofi-aventis - listened in only).

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CB - I think I can turn this into a short call. My management has indicated that we will not require additional remediation for waterproofing and other construction-related material. If this site was going to be turned into a playground for a daycare we might. But the site is remaining commercial.

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CB - Greg?

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JF- ERM requests confirmation of the acceptability of submitting the draft FER mentioning the BB2-14 work, but only including a "placeholder" appendix for the report at this time. The BB2-14 report will be submitted and incorporated into the FER after the additional sampling work and laboratory analysis has been completed. GM agreed, but repeated that the FER would not be approved until the BB2-14 report had been submitted.

Thank you for your assistance. Please contact Libby or me if you have any questions or comments.

Regards,
Jon

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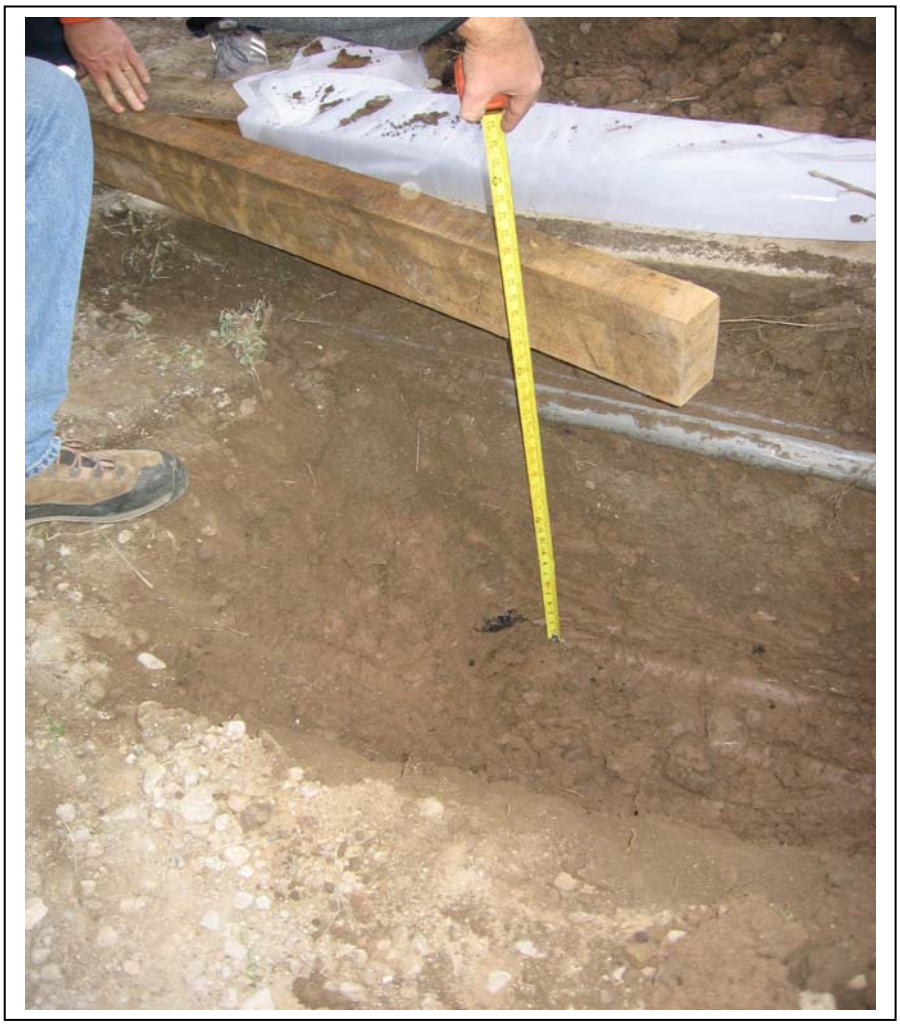
Appendix B-2
Photographic Log

PHOTOLOG

Project Name:	BB2-14 Soil Excavation	Client Name:	UCB
Project No.:	0040628	Prepared By:	Nancy Rae Reese

NOTES

View looking south at the BB2-14 excavation on the west side of building #2. Note various areas with black bituminous-like material in the walls and floor of the excavation.



NOTES

View looking southeast at the BB2-14 excavation showing soil characteristics, adjacent site features, subsurface conduits encountered, and abundant black bituminous-like material in the excavation.

PHOTOLOG

Project Name:	BB2-14 Soil Excavation	Client Name:	UCB
Project No.:	0040628	Prepared By:	Nancy Rae Reese

NOTES

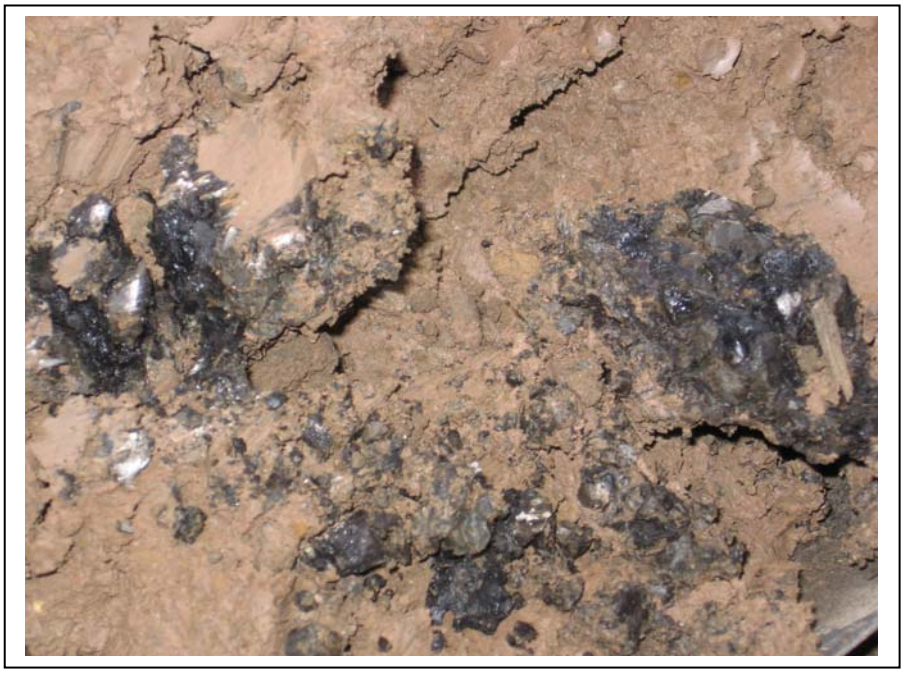
Close-up view of black bituminous-like material in the BB2-14 excavation.

NOTES

Close-up view of some of the black bituminous-like material removed from the BB2-14 excavation.

PHOTOLOG

Project Name:	BB2-14 Soil Excavation	Client Name:	UCB
Project No.:	0040628	Prepared By:	Nancy Rae Reese



NOTES

Another close-up view of black bituminous-like material removed from the BB2-14 excavation.

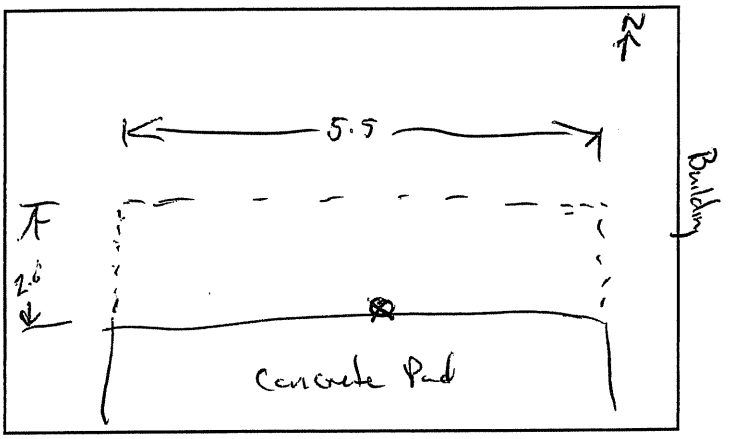
Appendix B-3
Soil Sampling Records

SOIL SAMPLING RECORD

Job Number: 0040628
Site Name/location: Jefferson Rd / BD2-14 area
Sample ID: VCB-CS01 (18.5)

Date: 8 Nov 05
Time: 0839
Sampler(s): TCM

Sample Location Sketch



ERM

Sample Type/ Methodolgy/Description:
(grab) composite
Sample from trench wall
18.5" below reference point.
Medium brown sandy gravel

Sampling Device

Split Spoon Hand Auger ESP (Stainless Steel Spoon) macrocore

Sample Description

Color(s): Medium Brown
Texture(s) (Grain Size): Sandy gravel with fines.
Consistency: Very Soft (Soft) Firm Hard Very Hard
Structure: (Homogeneous) Non-homogeneous Other:
Moisture Content: Dry (Moist) Wet
Odor: (None) Weak Strong Describe Odor -

Analyses

VOCs ____ SVOCs X Metals PCBs
Cloride Iron Lead Cyanide

Weather

Conditions: Cloudy - no precip.
Temperature: Low 50's
Winds: windy from SW

Comments:

Reference Point elevation Top Concrete generator pad.

g:document/template/geoforms/SOILSAM.XLS
revised July 2002

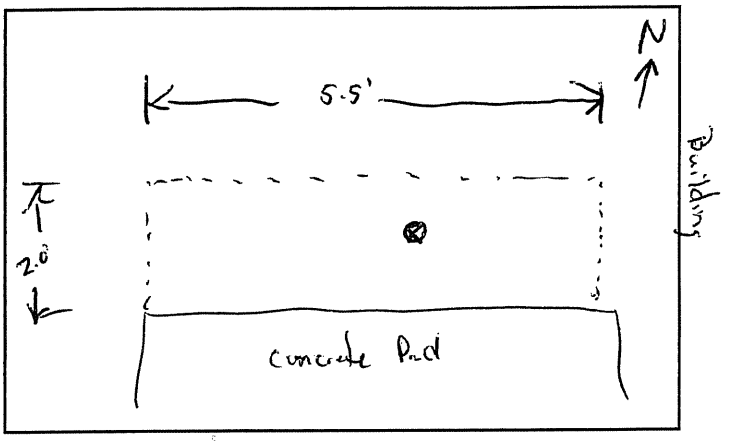
SOIL SAMPLING RECORD

Job Number: 0040628 Date: 8 Nov 05

Site Name/location: Jefferson Rd/ BB2-14 area Time: 0840

Sample ID: UCB-CS02(24) Sampler(s): TCM

Sample Location Sketch



ERM

Sample Type/ Methodolgy/Description:

(grab) composite

Sample from bottom of trench 24" below reference point ~ 13" north of UCB-CS01(18.5)

Sampling Device

Split Spoon Hand Auger ESP (Stainless Steel Spoon) macrocore

Sample Description

Color(s): yellow brown to brown ~~silty~~ TCM

Texture(s) (Grain Size): Silty- matrix fine gravel

Consistency: Very Soft Soft (Firm) Hard Very Hard

Structure: (Homogeneous) Non-homogeneous Other:

Moisture Content: Dry (Moist) Wet

Odor: (None) Weak Strong Describe Odor -

Analyses

VOCs ____ SVOCs X Metals PCBs

Cloride Iron Lead Cyanide

Weather

Conditions: Cloudy - no precip.

Temperature: Low 50's

Winds: wndy - S W

Comments:

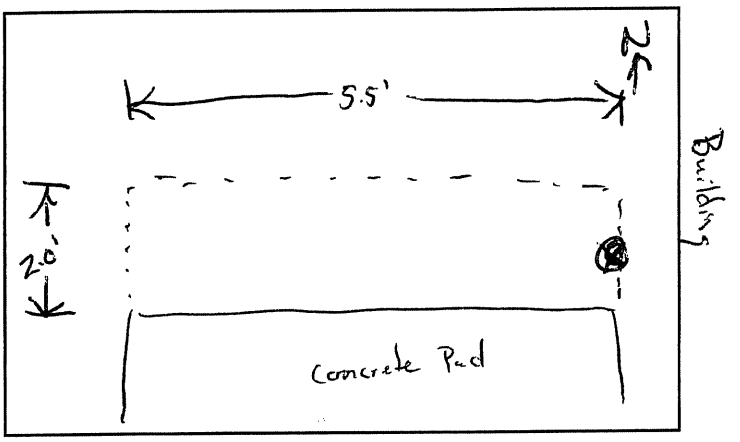
Reference Point elevation - Top Concrete generator pad

SOIL SAMPLING RECORD

Job Number: 0040628
Site Name/location: Jefferson Rd / BB2-14 area
Sample ID: UCB-CS03(16)

Date: 8 Nov 05
Time: 0845
Sampler(s): TCM

Sample Location Sketch



ERM

Sample Type/ Methodolgy/Description:
(grab) composite
East wall of trench - 16" below reference point

Sampling Device

Split Spoon Hand Auger ESP (Stainless Steel Spoon) macrocore

Sample Description

Color(s): Medium brown
Texture(s) (Grain Size): Sandy gravel with some fines
Consistency: Very Soft (Soft) Firm Hard Very Hard
Structure: (Homogeneous) Non-homogeneous Other:
Moisture Content: Dry (Moist) Wet
Odor: (None) Weak Strong Describe Odor -

Analyses

VOCs ____ SVOCs X Metals PCBs
Cloride Iron Lead Cyanide

Weather

Conditions: Cloudy - No precip.
Temperature: Low 50's
Winds: windy from SW

Comments:

Reference Point - Top concrete generator Pad.

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revised July 2002

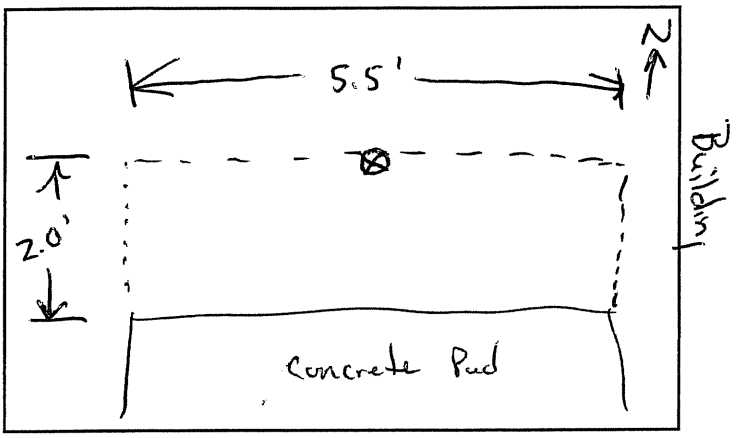
SOIL SAMPLING RECORD

Job Number: 0040628 Date: 8 NOV 2005

Site Name/location: Jefferson Rd / BB2-14 area Time: 0847

Sample ID: UCB-CS04(15) Sampler(s): TCM

Sample Location Sketch



ERM

Sample Type/ Methodolgy/Description:

(grab) composite

Collected from north wall of trench - 15" below reference point

Sampling Device

Split Spoon Hand Auger ESP (Stainless Steel Spoon) macrocore

Sample Description

Color(s): medium brown

Texture(s) (Grain Size): Sandy gravel with fines

Consistency: Very Soft (Soft) Firm Hard Very Hard

Structure: (Homogeneous) Non-homogeneous Other:

Moisture Content: Dry (Moist) Wet

Odor: None Weak Strong Describe Odor -

Analyses

VOCs ____ SVOCs X Metals PCBs

Cloride Iron Lead Cyanide

Weather

Conditions: Cloudy - No Precip.

Temperature: Low 50's

Winds: windy - SW

Comments:

Reference Point elevation - Top of concrete generator Pad

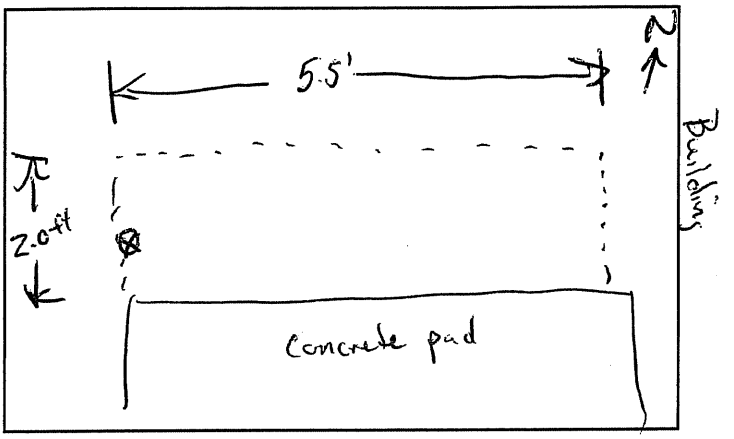
SOIL SAMPLING RECORD

Job Number: 0040629 Date: 8Nov05

Site Name/location: Jefferson Rd / BB2-14 area Time: 0852

Sample ID: UCB-CS05 (19) Sampler(s): Tim

Sample Location Sketch



ERM

Sample Type/ Methodolgy/Description:

(grab) composite

Collected from westend of trench - 19" below reference Point.

Removed loose material from wall first

Sampling Device

Split Spoon Hand Auger ESP (Stainless Steel Spoon) macrocore

Sample Description

Color(s): Medium Brown

Texture(s) (Grain Size): Sandy gravel with fines

Consistency: Very Soft (Soft) Firm Hard Very Hard

Structure: (Homogeneous) Non-homogeneous Other:

Moisture Content: Dry (Moist) Wet

Odor: (None) Weak Strong Describe Odor -

Analyses

VOCs ____ SVOCs X Metals PCBs

Cloride Iron Lead Cyanide

Weather

Conditions: Cloudy - No precip.

Temperature: Low 50's

Winds: windy from SW

Comments:

Reference Point elevation- Top of Generator Pad

Duplicate collected here UCB-CS06(20)

g:document/template/geoforms/SOILSAM.XLS
revised July 2002

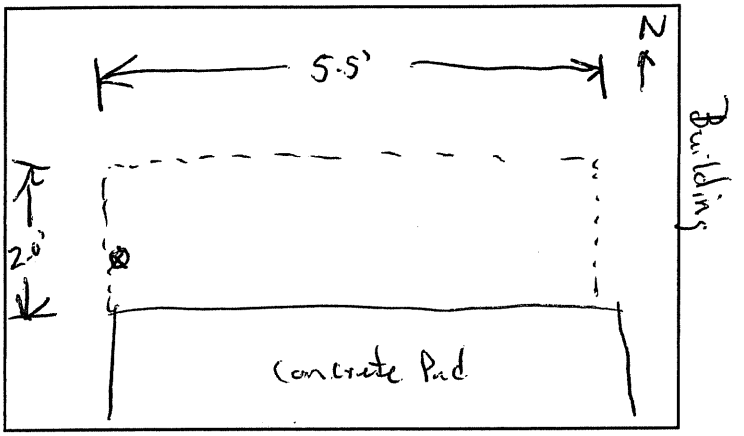
SOIL SAMPLING RECORD

Job Number: 0040628 Date: 9 Nov 05

Site Name/location: Jefferson Rd / BB2-14 area Time: 0852

Sample ID: UCB-CS06(20) Sampler(s): TLM

Sample Location Sketch



ERM

Sample Type/ Methodolgy/Description:

(grab) composite

Collected just below UCB-CS05(19) as a dupe. Sample collected 20" below reference point

Sampling Device

Split Spoon Hand Auger ESP (Stainless Steel Spoon) macrocore

Sample Description

Color(s): Medium Brown

Texture(s) (Grain Size): Sandy gravel with fines

Consistency: Very Soft (Soft) Firm Hard Very Hard

Structure: (Homogeneous) Non-homogeneous Other:

Moisture Content: Dry (Moist) Wet

Odor: (None) Weak Strong Describe Odor -

Analyses

VOCs ____ SVOCs X Metals PCBs

Cloride Iron Lead Cyanide

Weather

Conditions: Cloudy - No Precip.

Temperature: Low 50's

Winds: windy from SW

Comments:

Reference Point Elevation - Top of Generator Pad

Sample is Duplicate of UCB-CS05(19).

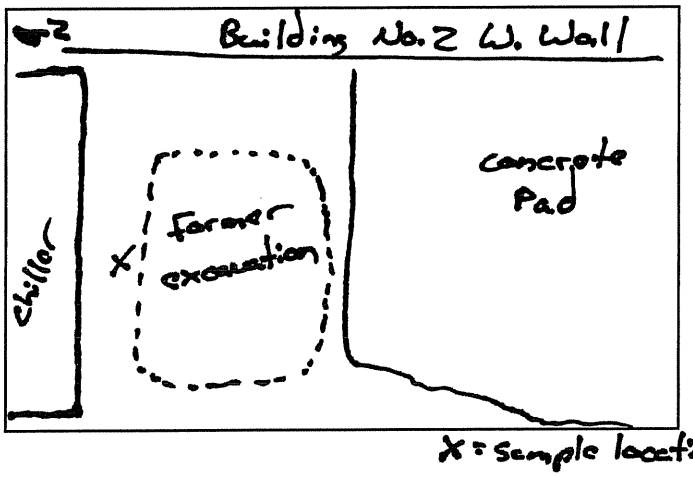
SOIL SAMPLING RECORD

Job Number: 0040628 Date: 27 Jan 06

Site Name/location: UCB facility - Rochester, NY Time: 1330

Sample ID: UCB-SS-N (0"-2") Sampler(s): R. Sorts

Sample Location Sketch



ERM

Sample Type/ Methodolgy/Description:

(grab) composite

Sampling Device

Split Spoon Hand Auger ESP (Stainless Steel Spoon) macrocore

Sample Description

Color(s): mod. brown

Texture(s) (Grain Size): silt to lg. gravel (fill material)

Consistency: Very Soft Soft (Firm) Hard Very Hard

Structure: (Homogeneous) Non-homogeneous Other:

Moisture Content: Dry (Moist) Wet

Odor: (None) Weak Strong Describe Odor -

Analyses

VOCs ____ SVOCs X Metals PCBs

Cloride Iron Lead Cyanide

Weather

Conditions: 33°F & clear

Temperature: ____

Winds: 0-5 mph out of South

Comments:

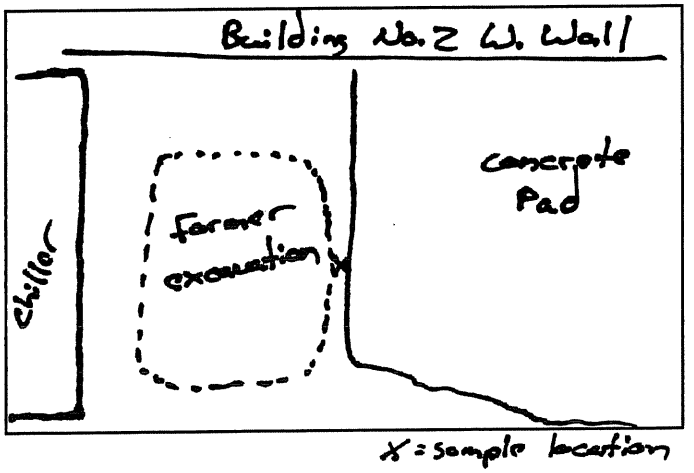
g:document/template/geoforms/SOILSAM.XLS
revised July 2002

SOIL SAMPLING RECORD

Job Number: 0040628
Site Name/location: UCB facility - Rochester, NY
Sample ID: UCB-SS-5 (0"-2")

Date: 27 Jan 06
Time: 13:55
Sampler(s): R. Scotts

Sample Location Sketch



ERM

Sample Type/ Methodolgy/Description:
(grab) composite

Sampling Device

Split Spoon Hand Auger ESP (Stainless Steel Spoon) macrocore

Sample Description

Color(s): mod. brown
Texture(s) (Grain Size): silt to med. sand, w/ organics (fill material)
Consistency: Very Soft Soft Firm (Hard) Very Hard
Structure: (Homogeneous) Non-homogeneous Other:
Moisture Content: Dry (Moist) Wet
Odor: (None) Weak Strong Describe Odor -

Analyses

VOCs ____ SVOCs X Metals PCBs
Cloride Iron Lead Cyanide

Weather

Conditions: 33°F
Temperature: clear
Winds: 0-5mph out of South

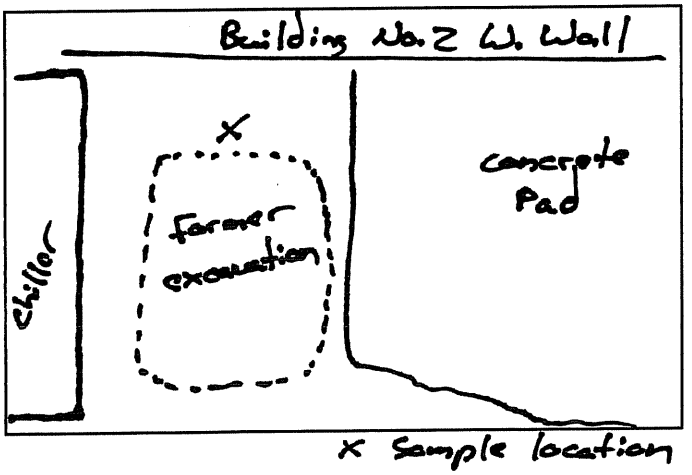
Comments:

SOIL SAMPLING RECORD

Job Number: 0040628
Site Name/location: UCB facility - Rochester, NY
Sample ID: UCB-SS-E (0"-2")

Date: 27 Jan 06
Time: 14:10
Sampler(s): R. Scotts

Sample Location Sketch



ERM

Sample Type/ Methodolgy/Description:
(grab) composite

Sampling Device

Split Spoon Hand Auger ESP (Stainless Steel Spoon) macrocore

Sample Description

Color(s): med. brown
Texture(s) (Grain Size): fine sand to coarse sand
Consistency: (Very Soft) Soft Firm Hard Very Hard
Structure: (Homogeneous) Non-homogeneous Other:
Moisture Content: Dry (Moist) Wet
Odor: (None) Weak Strong Describe Odor -

Analyses

VOCs ____ SVOCs X Metals PCBs
Cloride Iron Lead Cyanide

Weather

Conditions: 33°F
Temperature: clear
Winds: 0-5 mph out of South

Comments:

g:document/template/geoforms/SOILSAM.XLS
revised July 2002

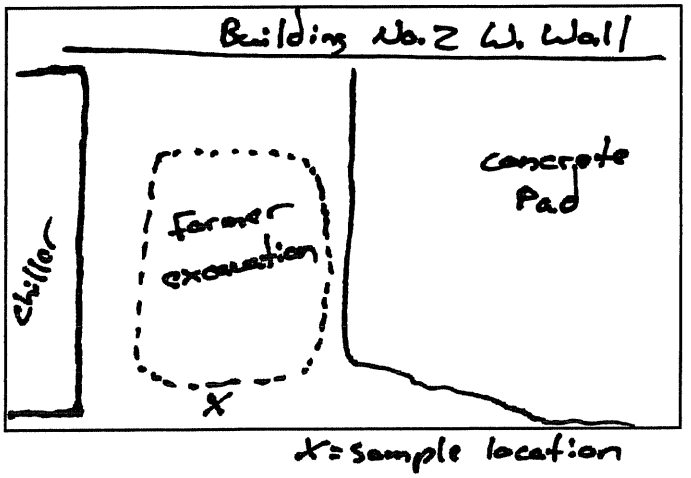
SOIL SAMPLING RECORD

Job Number: 0040628 Date: 27 Jan 06

Site Name/location: UCB facility - Rochester, NY Time: 13:45

Sample ID: UCB-SS-W (0"-2") Sampler(s): R. Scotts

Sample Location Sketch



ERM

Sample Type/ Methodolgy/Description:

(grab) composite

Sampling Device

Split Spoon Hand Auger ESP (Stainless Steel Spoon) macrocore

Sample Description

Color(s): mod. brown

Texture(s) (Grain Size): fine sand to mod. gravel (fill material)

Consistency: Very Soft (Soft) Firm Hard Very Hard

Structure: (Homogeneous) Non-homogeneous Other:

Moisture Content: Dry (Moist) Wet

Odor: (None) Weak Strong Describe Odor -

Analyses

VOCs ____ SVOCs X Metals PCBs

Cloride Iron Lead Cyanide

Weather

Conditions: 33°F

Temperature: clear

Winds: 0-5 mph out of South

Comments:

Appendix B-4
Data Usability Summary Report

DATA USABILITY SUMMARY REPORT (DUSR)
755 JEFFERSON ROAD FACILITY
HENRIETTA, NEW YORK
BB2-14 EXCAVATION CONFIRMATION SOIL SAMPLES
ENVIRONMENTAL RESOURCES MANAGEMENT (ERM)
SEVERN TRENT LABORATORIES (STL), BUFFALO, NEW YORK
JOB NUMBER A05-C730

Deliverables:

The above referenced data package for six (6) soil samples and one (1) set of matrix spike/matrix spike duplicate (MS/MSD) samples contains all the required deliverables as stipulated under the 2000 New York State Department of Environmental Conservation (NYSDEC) Analytical Services Protocol (ASP) Category B deliverables. The sample specific analysis performed included Semivolatile Organic Compound (VOC) analysis in accordance with USEPA SW-846 Method 8270C for the following five (5) project specific compounds: Benzo(a)anthracene, Benzo(b)fluoranthene, Benzo(k)fluoranthene, Benzo(a)pyrene, and Chrysene following *"Test Methods for Evaluation Solid Waste, USEPA SW-846, Third Edition, September 1986, with revisions."* The data have been evaluated according to the protocols and quality control (QC) requirements of the ASP, the National Functional Guidelines for Organic Data Review (October 1999), the USEPA Region II Data Review Standard Operating Procedure (SOP) Number HW-22, Revision 2, June 2001: Validating Semivolatile Organic Compounds by SW-846 Method 8270C, and the reviewer's professional judgment.

This report pertains to the following soil samples collected on 08 November 2005:

Samples

UCB-CS01 (18.5)
UCB-CS02 (24)
UCB-CS03 (16)
UCB-CS04 (15)
UCB-CS05 (19)
UCB-CS06 (20)

QC Samples

UCB-CS01 (18.5) MS/MSD

Organics

The following items/criteria were reviewed:

- Case narrative and deliverables compliance
- Holding times and sample preservation
- Surrogate compound recoveries, summary and data
- MS/MSD results, recoveries, summary and data
- Method blank summary and data
- Gas Chromatography (GC)/Mass Spectroscopy (MS) tuning and performance
- Initial and continuing calibration summaries and data
- Internal standard areas, retention times, summary and data
- Organic analysis data sheets (Form I)
- GC/MS chromatograms, mass spectra and quantitation reports
- Quantitation/detection limits
- Qualitative and quantitative compound identification

The items listed above have been judged to be in compliance with the analytical methods and with the ASP criteria with the exceptions discussed in the text below. The data have evaluated according to the procedures outlined above and qualified accordingly.

Semivolatiles

- The laboratory analyzed the MS/MSD sample, however since the project specific compound list does not include any of the method specific spiking compounds the results of the MS/MSD have not been reported by the laboratory. It is the reviewer's professional opinion that the data are still valid and useable and no qualification is required.

- The percent recovery (%R) for the surrogate compound 2,4,6-tribromophenol was slightly below QC limits for the MSD analyzed on sample UCB-CS01 (18.5) (48%; QC limit 53-132%). Data are not qualified with respect to surrogate recovery unless two or more semivolatile surrogates, within the same fraction, are out of specification. No qualification of the sample data is therefore required. It should be noted that all surrogate %R were within QC limits for the unspiked sample and the MS analysis.

Package Summary:

All data are valid and usable with qualifications as noted in this review.

Signed: _____ Dated: 21 December 2005

Andrew J. Coenen
ERM QA/QC Officer

METHOD 8270 - 5 COMPOUNDS
ANALYSIS DATA SHEET

Client No.

UCB-BLACK(23)

Lab Name: STL Buffalo Contract: _____

Lab Code: RECNY Case No.: _____ SAS No.: _____ SDG No.: _____

Matrix: (soil/water) SOIL Lab Sample ID: A5C73007

Sample wt/vol: 30.18 (g/mL) G Lab File ID: U08671.RR

Level: (low/med) LOW Date Samp/Recv: 11/08/2005 11/08/2005

% Moisture: 10 decanted: (Y/N) N Date Extracted: 11/10/2005

Concentrated Extract Volume: 1000 (uL) Date Analyzed: 11/17/2005

Injection Volume: 1.00 (uL) Dilution Factor: 1.00

GPC Cleanup: (Y/N) N pH: ____

CAS NO.	COMPOUND	CONCENTRATION UNITS: (ug/L or ug/Kg) UG/KG	Q
56-55-3	Benzo(a)anthracene	92	J
205-99-2	Benzo(b)fluoranthene	120	J
207-08-9	Benzo(k)fluoranthene	45	J
50-32-8	Benzo(a)pyrene	90	J
218-01-9	Chrysene	93	J

METHOD 8270 - 5 COMPOUNDS
ANALYSIS DATA SHEET

Client No.

UCB-CS01(18.5)

Lab Name: STL Buffalo Contract: _____

Lab Code: RECNY Case No.: _____ SAS No.: _____ SDG No.: _____

Matrix: (soil/water) SOIL Lab Sample ID: A5C73001

Sample wt/vol: 30.22 (g/mL) G Lab File ID: U08575.RR

Level: (low/med) LOW Date Samp/Recv: 11/08/2005 11/08/2005

% Moisture: 17 decanted: (Y/N) N Date Extracted: 11/10/2005

Concentrated Extract Volume: 1000 (uL) Date Analyzed: 11/14/2005

Injection Volume: 1.00 (uL) Dilution Factor: 1.00

GPC Cleanup: (Y/N) N pH: ____

CAS NO.	COMPOUND	CONCENTRATION UNITS: (ug/L or ug/Kg) UG/KG	Q
56-55-3	Benzo(a)anthracene	420	
205-99-2	Benzo(b)fluoranthene	510	
207-08-9	Benzo(k)fluoranthene	190	J
50-32-8	Benzo(a)pyrene	370	J
218-01-9	Chrysene	400	

METHOD 8270 - 5 COMPOUNDS
ANALYSIS DATA SHEET

Client No.

UCB-CS02(24)

Lab Name: STL Buffalo Contract: _____

Lab Code: RECNY Case No.: _____ SAS No.: _____ SDG No.: _____

Matrix: (soil/water) SOIL Lab Sample ID: A5C73002

Sample wt/vol: 30.92 (g/mL) G Lab File ID: U08576.RR

Level: (low/med) LOW Date Samp/Recv: 11/08/2005 11/08/2005

% Moisture: 19 decanted: (Y/N) N Date Extracted: 11/10/2005

Concentrated Extract Volume: 1000 (uL) Date Analyzed: 11/14/2005

Injection Volume: 1.00 (uL) Dilution Factor: 1.00

GPC Cleanup: (Y/N) N pH: ____

CAS NO.	COMPOUND	CONCENTRATION UNITS: (ug/L or ug/Kg) UG/KG	Q
56-55-3	Benzo(a)anthracene	240	J
205-99-2	Benzo(b)fluoranthene	290	J
207-08-9	Benzo(k)fluoranthene	110	J
50-32-8	Benzo(a)pyrene	220	J
218-01-9	Chrysene	220	J

METHOD 8270 - 5 COMPOUNDS
ANALYSIS DATA SHEET

Client No.: UCB-CS03(16)

Lab Name: STL Buffalo Contract: _____

Lab Code: RECNY Case No.: _____ SAS No.: _____ SDG No.: _____

Matrix: (soil/water) SOIL Lab Sample ID: A5C73003

Sample wt/vol: 30.55 (g/mL) G Lab File ID: U08577.RR

Level: (low/med) LOW Date Samp/Recv: 11/08/2005 11/08/2005

% Moisture: 18 decanted: (Y/N) N Date Extracted: 11/10/2005

Concentrated Extract Volume: 1000 (uL) Date Analyzed: 11/14/2005

Injection Volume: 1.00 (uL) Dilution Factor: 1.00

GPC Cleanup: (Y/N) N pH: ____

CAS NO.	COMPOUND	CONCENTRATION UNITS: (ug/L or ug/Kg) UG/KG	Q
56-55-3	Benzo(a)anthracene	1000	
205-99-2	Benzo(b)fluoranthene	1400	
207-08-9	Benzo(k)fluoranthene	1500	
50-32-8	Benzo(a)pyrene	780	
218-01-9	Chrysene	940	

METHOD 8270 - 5 COMPOUNDS
ANALYSIS DATA SHEET

Client No.

UCB-CS04(15)

Lab Name: STL Buffalo Contract: _____

Lab Code: RECNY Case No.: _____ SAS No.: _____ SDG No.: _____

Matrix: (soil/water) SOIL Lab Sample ID: A5C73004

Sample wt/vol: 30.11 (g/mL) G Lab File ID: U08578.RR

Level: (low/med) LOW Date Samp/Recv: 11/08/2005 11/08/2005

% Moisture: 18 decanted: (Y/N) N Date Extracted: 11/10/2005

Concentrated Extract Volume: 1000 (uL) Date Analyzed: 11/14/2005

Injection Volume: 1.00 (uL) Dilution Factor: 1.00

GPC Cleanup: (Y/N) N pH: ____

CAS NO.	COMPOUND	CONCENTRATION UNITS: (ug/L or ug/Kg) UG/KG	Q
56-55-3	Benzo(a)anthracene	540	
205-99-2	Benzo(b)fluoranthene	640	
207-08-9	Benzo(k)fluoranthene	250	J
50-32-8	Benzo(a)pyrene	480	
218-01-9	Chrysene	500	

METHOD 8270 - 5 COMPOUNDS
ANALYSIS DATA SHEET

Client No.

UCB-CS05(19)

Lab Name: STL Buffalo Contract: _____

Lab Code: RECNY Case No.: _____ SAS No.: _____ SDG No.: _____

Matrix: (soil/water) SOIL Lab Sample ID: A5C73005

Sample wt/vol: 30.52 (g/mL) G Lab File ID: U08579.RR

Level: (low/med) LOW Date Samp/Recv: 11/08/2005 11/08/2005

% Moisture: 15 decanted: (Y/N) N Date Extracted: 11/10/2005

Concentrated Extract Volume: 1000 (uL) Date Analyzed: 11/14/2005

Injection Volume: 1.00 (uL) Dilution Factor: 1.00

GPC Cleanup: (Y/N) N pH: ____

CAS NO.	COMPOUND	CONCENTRATION UNITS: (ug/L or ug/Kg) UG/KG	Q
56-55-3	Benzo(a)anthracene	87	J
205-99-2	Benzo(b)fluoranthene	120	J
207-08-9	Benzo(k)fluoranthene	39	J
50-32-8	Benzo(a)pyrene	80	J
218-01-9	Chrysene	91	J

METHOD 8270 - 5 COMPOUNDS
ANALYSIS DATA SHEET

Client No.

UCB-CS06(20)

Lab Name: STL Buffalo Contract: _____

Lab Code: RECNY Case No.: _____ SAS No.: _____ SDG No.: _____

Matrix: (soil/water) SOIL Lab Sample ID: A5C73006

Sample wt/vol: 30.78 (g/mL) G Lab File ID: U08580.RR

Level: (low/med) LOW Date Samp/Recv: 11/08/2005 11/08/2005

% Moisture: 17 decanted: (Y/N) N Date Extracted: 11/10/2005

Concentrated Extract Volume: 1000 (uL) Date Analyzed: 11/14/2005

Injection Volume: 1.00 (uL) Dilution Factor: 1.00

GPC Cleanup: (Y/N) N pH: ____

CAS NO.	COMPOUND	CONCENTRATION UNITS: (ug/L or ug/Kg) UG/KG	Q
56-55-3	Benzo(a)anthracene	110	J
205-99-2	Benzo(b)fluoranthene	150	J
207-08-9	Benzo(k)fluoranthene	51	J
50-32-8	Benzo(a)pyrene	110	J
218-01-9	Chrysene	120	J

DATA USABILITY SUMMARY REPORT (DUSR)
755 JEFFERSON ROAD FACILITY
HENRIETTA, NEW YORK
BB2-14 SURFACE SOIL SAMPLES
ENVIRONMENTAL RESOURCES MANAGEMENT (ERM)
SEVERN TRENT LABORATORIES (STL), BUFFALO, NEW YORK
JOB NUMBER A06-1058

Deliverables:

The above referenced data package for four (4) soil samples and one (1) set of matrix spike/matrix spike duplicate (MS/MSD) samples contains all the required deliverables as stipulated under the 2000 New York State Department of Environmental Conservation (NYSDEC) Analytical Services Protocol (ASP) Category B deliverables. The sample specific analysis performed included Semivolatile Organic Compound (VOC) analysis in accordance with USEPA SW-846 Method 8270C for the following twenty-two (22) project specific compounds: acenaphthene, acenaphthylene, anthracene, benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, benzo(g,h,i)perylene, benzo(k)fluoranthene, bis(2-ethylhexyl)phthalate, carbazole, chrysene, dibenzo(a,h)anthracene, dibenzofuran, di-n-butylphthalate, di-n-octylphthalate, fluoranthene, fluorene, indeno(1,2,3-cd)pyrene, 2-methylnaphthalene, naphthalene, phenanthrene, and pyrene following *"Test Methods for Evaluation Solid Waste, USEPA SW-846, Third Edition, September 1986, with revisions."* The data have been evaluated according to the protocols and quality control (QC) requirements of the ASP, the National Functional Guidelines for Organic Data Review (October 1999), the USEPA Region II Data Review Standard Operating Procedure (SOP) Number HW-22, Revision 2, June 2001: Validating Semivolatile Organic Compounds by SW-846 Method 8270C, and the reviewer's professional judgment.

This report pertains to the following soil samples collected on 27 January 2006:

Samples

UCB-SS-E (0-2)
UCB-SS-N (0-2)
UCB-SS-S (0-2)
UCB-SS-W (0-2)

QC Samples

UCB-SS-W (0-2) MS/MSD

Organics

The following items/criteria were reviewed:

- Case narrative and deliverables compliance
- Holding times and sample preservation
- Surrogate compound recoveries, summary and data
- Matrix Spike/Matrix Spike Duplicate (MS/MSD) results, recoveries, summary and data
- Matrix Spike Blank (MSB) results, recoveries, summary and data
- Method blank summary and data
- Gas Chromatography (GC)/Mass Spectroscopy (MS) tuning and performance
- Initial and continuing calibration summaries and data
- Internal standard areas, retention times, summary and data
- Organic analysis data sheets (Form I)
- GC/MS chromatograms, mass spectra and quantitation reports
- Quantitation/detection limits
- Qualitative and quantitative compound identification

The items listed above have been judged to be in compliance with the analytical methods and with the ASP criteria with the exceptions discussed in the text below. The data have evaluated according to the procedures outlined above and qualified accordingly.

Semivolatiles

- All samples were analyzed at ten-fold (10x) dilutions based on the sample matrix. The laboratory has reported only this analysis as the dilutions were justified and most target compounds were detected in the samples. No qualification of the sample data is required, however the data user should be aware of elevated reporting limits for a few non-detected target compounds.

- The following table list MS/MSD percent recoveries (%R) for sample UCB-SS-W (0-2) above QC criteria. These elevated %R can be attributed to the elevated presence of the spiking compounds in the unspiked sample. Qualification of data is not performed based on MS/MSD results alone. Results for these compounds in the unspiked sample result only will be qualified as estimated and qualified "J". All relative percent differences (RPDs) were within QC limits in the MS/MSD and all %R were within QC limits for the associated MSB.

Compound	MS %R	MSD %R	QC Limits
benzo(a)anthracene	141	141	81-130
benzo(b)fluoranthene	138	OK	78-135
benzo(k)fluoranthene	OK	152	52-145
benzo(a)pyrene	136	142	78-125
chrysene	151	155	55-149
fluoranthene	174	185	56-141
phenanthrene	152	137	63-130

- The following table lists blanks, blank contaminants with concentrations and the samples associated with the blanks. Common laboratory phthalate contaminants such as bis(2-ethylhexyl)phthalate are negated in a sample if the sample concentration is less than or equal to ten times (10x) the highest associated blank concentration. For all other compounds, an action level of five times (5x) the highest associated blank concentration is used.

Blank	Contaminant	Concentration (Action Level)	Associated Samples
SBLK12	bis(2 ethylhexyl)phthalate	30J (300 µg/kg)	All samples in A06-1058

Package Summary:

All data are valid and usable with qualifications as noted in this review.

Signed: _____ Dated: 20 February 2006

Andrew J. Coenen
ERM QA/QC Officer

METHOD 8270 - 22 COMPOUNDS
ANALYSIS DATA SHEET

Client No.

UCB-SS-E (0-2)

Lab Name: STL Buffalo Contract: _____

Lab Code: RECNY Case No.: _____ SAS No.: _____ SDG No.: _____

Matrix: (soil/water) SOIL Lab Sample ID: A6105804

Sample wt/vol: 30.58 (g/mL) G Lab File ID: U10340.RR

Level: (low/med) LOW Date Samp/Recv: 01/27/2006 01/28/2006

% Moisture: 11 decanted: (Y/N) N Date Extracted: 02/01/2006

Concentrated Extract Volume: 1000 (uL) Date Analyzed: 02/03/2006

Injection Volume: 1.00 (uL) Dilution Factor: 10.00

GPC Cleanup: (Y/N) N pH: ____

CAS NO.	COMPOUND	CONCENTRATION UNITS: (ug/L or ug/Kg) UG/KG	Q
83-32-9	Acenaphthene	750	J
208-96-8	Acenaphthylene	3600	U
120-12-7	Anthracene	1000	J
56-55-3	Benzo(a)anthracene	3400	J
205-99-2	Benzo(b)fluoranthene	5500	
207-08-9	Benzo(k)fluoranthene	5700	
191-24-2	Benzo(ghi)perylene	1700	J
50-32-8	Benzo(a)pyrene	3300	J
117-81-7	Bis(2-ethylhexyl) phthalate	3600	U
86-74-8	Carbazole	600	J
218-01-9	Chrysene	3200	J
53-70-3	Dibenzo(a,h)anthracene	460	J
132-64-9	Dibenzofuran	240	J
84-74-2	Di-n-butyl phthalate	3600	U
117-84-0	Di-n-octyl phthalate	3600	U
206-44-0	Fluoranthene	7700	
86-73-7	Fluorene	540	J
193-39-5	Indeno(1,2,3-cd)pyrene	1500	J
91-57-6	2-Methylnaphthalene	3600	U
91-20-3	Naphthalene	3600	U
85-01-8	Phenanthrene	4500	
129-00-0	Pyrene	5600	

METHOD 8270 - 22 COMPOUNDS
ANALYSIS DATA SHEET

Client No.

UCB-SS-N (0-2)

Lab Name: STL Buffalo Contract: _____

Lab Code: RECNY Case No.: _____ SAS No.: _____ SDG No.: _____

Matrix: (soil/water) SOIL Lab Sample ID: A6105801

Sample wt/vol: 30.10 (g/mL) G Lab File ID: U10335.RR

Level: (low/med) LOW Date Samp/Recv: 01/27/2006 01/28/2006

% Moisture: 9 decanted: (Y/N) N Date Extracted: 02/01/2006

Concentrated Extract Volume: 1000 (uL) Date Analyzed: 02/03/2006

Injection Volume: 1.00 (uL) Dilution Factor: 10.00

GPC Cleanup: (Y/N) N pH: ____

CAS NO.	COMPOUND	CONCENTRATION UNITS: (ug/L or ug/Kg) UG/KG	Q	
83-32-9	Acenaphthene	1400	J	
208-96-8	Acenaphthylene	720	J	
120-12-7	Anthracene	2300	J	
56-55-3	Benzo(a)anthracene	6200	J	
205-99-2	Benzo(b)fluoranthene	8300	J	
207-08-9	Benzo(k)fluoranthene	2300	J	
191-24-2	Benzo(ghi)perylene	3100	J	
50-32-8	Benzo(a)pyrene	6200	J	
117-81-7	Bis(2-ethylhexyl) phthalate	3600 ~~300~~	~~BJ~~	U
86-74-8	Carbazole	1600	J	
218-01-9	Chrysene	6100	J	
53-70-3	Dibenzo(a,h)anthracene	920	J	
132-64-9	Dibenzofuran	810	J	
84-74-2	Di-n-butyl phthalate	3600	U	
117-84-0	Di-n-octyl phthalate	3600	U	
206-44-0	Fluoranthene	14000	J	
86-73-7	Fluorene	1400	J	
193-39-5	Indeno(1,2,3-cd)pyrene	2900	J	
91-57-6	2-Methylnaphthalene	460	J	
91-20-3	Naphthalene	1200	J	
85-01-8	Phenanthrene	10000	J	
129-00-0	Pyrene	11000		

METHOD 8270 - 22 COMPOUNDS
ANALYSIS DATA SHEET

Client No.

UCB-SS-S (0-2)

Lab Name: STL Buffalo Contract: _____

Lab Code: RECNY Case No.: _____ SAS No.: _____ SDG No.: _____

Matrix: (soil/water) SOIL Lab Sample ID: A6105803

Sample wt/vol: 30.32 (g/mL) G Lab File ID: U10339.RR

Level: (low/med) LOW Date Samp/Recv: 01/27/2006 01/28/2006

% Moisture: 32 decanted: (Y/N) N Date Extracted: 02/01/2006

Concentrated Extract Volume: 1000 (uL) Date Analyzed: 02/03/2006

Injection Volume: 1.00 (uL) Dilution Factor: 10.00

GPC Cleanup: (Y/N) N pH: ____

CAS NO.	COMPOUND	CONCENTRATION UNITS: (ug/L or ug/Kg) UG/KG	Q
83-32-9	Acenaphthene	710	J
208-96-8	Acenaphthylene	4800	U
120-12-7	Anthracene	1800	J
56-55-3	Benzo(a)anthracene	6400	
205-99-2	Benzo(b)fluoranthene	8700	
207-08-9	Benzo(k)fluoranthene	2100	J
191-24-2	Benzo(ghi)perylene	2400	J
50-32-8	Benzo(a)pyrene	5900	
117-81-7	Bis(2-ethylhexyl) phthalate	4800 ~~310~~	~~BJ~~ U
86-74-8	Carbazole	1100	J
218-01-9	Chrysene	6800	
53-70-3	Dibenzo(a,h)anthracene	760	J
132-64-9	Dibenzofuran	370	J
84-74-2	Di-n-butyl phthalate	4800	U
117-84-0	Di-n-octyl phthalate	4800	U
206-44-0	Fluoranthene	12000	
86-73-7	Fluorene	710	J
193-39-5	Indeno(1,2,3-cd)pyrene	2400	J
91-57-6	2-Methylnaphthalene	4800	U
91-20-3	Naphthalene	350	J
85-01-8	Phenanthrene	7000	
129-00-0	Pyrene	9200	

METHOD 8270 - 22 COMPOUNDS
ANALYSIS DATA SHEET

Client No.

UCB-SS-W (0-2)

Lab Name: STL Buffalo Contract: _____

Lab Code: RECNY Case No.: _____ SAS No.: _____ SDG No.: _____

Matrix: (soil/water) SOIL Lab Sample ID: A6105802

Sample wt/vol: 30.56 (g/mL) G Lab File ID: U10336.RR

Level: (low/med) LOW Date Samp/Recv: 01/27/2006 01/28/2006

% Moisture: 10 decanted: (Y/N) N Date Extracted: 02/01/2006

Concentrated Extract Volume: 1000 (uL) Date Analyzed: 02/03/2006

Injection Volume: 1.00 (uL) Dilution Factor: 10.00

GPC Cleanup: (Y/N) N pH: ____

CAS NO.	COMPOUND	CONCENTRATION UNITS: (ug/L or ug/Kg) UG/KG	Q
83-32-9	Acenaphthene	230	J
208-96-8	Acenaphthylene	3600	U
120-12-7	Anthracene	580	J
56-55-3	Benzo(a)anthracene	2800	J
205-99-2	Benzo(b)fluoranthene	4300	
207-08-9	Benzo(k)fluoranthene	990	J
191-24-2	Benzo(ghi)perylene	1500	J
50-32-8	Benzo(a)pyrene	2800	J
117-81-7	Bis(2-ethylhexyl) phthalate	3600	U
86-74-8	Carbazole	350	J
218-01-9	Chrysene	3000	J
53-70-3	Dibenzo(a,h)anthracene	410	J
132-64-9	Dibenzofuran	3600	U
84-74-2	Di-n-butyl phthalate	3600	U
117-84-0	Di-n-octyl phthalate	3600	U
206-44-0	Fluoranthene	5500	
86-73-7	Fluorene	230	J
193-39-5	Indeno(1,2,3-cd)pyrene	1400	J
91-57-6	2-Methylnaphthalene	3600	U
91-20-3	Naphthalene	3600	U
85-01-8	Phenanthrene	2600	J
129-00-0	Pyrene	4300	

Appendix B-5
Non-Hazardous Waste Manifest

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

NON-HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: NYD 082219756
Manifest Doc. No.: 00136
2. Page 1 of 1

GENERATOR

3. Generator's Name and Mailing Address: UCB MANUFACTURING, INC
755 JEFFERSON ROAD
HENRIETTA, NY 14623
4. Generator's Phone ( ): 585-274-5819

NYD 082219756
SAME

5. Transporter 1 Company Name: Environmental Service Group, Inc
6. US EPA ID Number: NYD986903904
A. Transporter's Phone: 716.695.6720

7. Transporter 2 Company Name:
8. US EPA ID Number:
B. Transporter's Phone:

9. Designated Facility Name and Site Address: American Recyclers Company
177 Wales Ave
Tonawanda, NY 14150
10. US EPA ID Number: NYR000030809
C. Facility's Phone: 716.695.6720

11. Waste Shipping Name and Description	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol
a. Non-RCRA, Non-D.O.T. Regulated Soil	004	DM	02000	P
b.				
c.				
d.				

D. Additional Descriptions for Materials Listed Above
Also Fits: A-VCP# C-
B V00126-8 D

E. Handling Codes for Wastes Listed Above
A-1 C-
B- D-

15. Special Handling Instructions and Additional Information
A-1-1200
B-
C-
D-

24 Hour Emergency Contact:
INFOTRAC (Caller Must ID ESG) 800-535-5053
Consult ESG#:

16. **GENERATOR'S CERTIFICATION:** I certify the materials described above on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste.

Printed/Typed Name: Jeffrey J Hohman
Signature: Jeffrey J Hohman
Month: 01 Day: 12 Year: 06

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Michael LeBarron Jr
Signature: Michael LeBarron Jr
Month: 01 Day: 12 Year: 06

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name:
Signature:
Month: Day: Year:

FACILITY

19. Discrepancy Indication Space

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

Printed/Typed Name:
Signature:
Month: Day: Year:

GENERATOR'S COPY