



**Methylene Chloride Area
Operation Maintenance and Monitoring Final Engineering Report and
Petition for Remedial Closeout**

755 Jefferson Road
Henrietta, New York
Monroe County
VCA D8-0001-97-07
NYSDEC Site Code # V00126-8

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APPENDICES

- Appendix A - June 2010 Monthly Progress Report
- Appendix B - Historical Quarterly Environmental Effectiveness Monitoring Reports (QEEMR) 2009-2011 (***Historical Reports have been previously submitted but are available upon request.***)
- Appendix C - MPRS Pulsing Test Summary Report
- Appendix D - Approved Site Management Plan (***The Site Management Plan has been submitted under separate cover.***)

1.0 PURPOSE

Consistent with Section I (E and F(1)) of the Voluntary Cleanup Agreement (VCA) signed by Medeva Pharmaceuticals Manufacturing, Inc. and the New York State Department of Environmental Conservation (NYSDEC) (NYSDEC, 1998)¹, this Report contains:

1. The OM&M Final Engineering Report (FER for the Methylene Chloride Area (MCA), including a certification that the pending OM&M Plan was implemented as written.
2. A request to permanently shutdown the MCA remedial treatment system.

UCB, the successor to Medeva Pharmaceuticals Manufacturing, Inc. is working together with the successor of a prior owner to implement the investigation and remediation activities at the 755 Jefferson Road Site. Accordingly, this report has been prepared to include the supporting information documenting the substantial remedial efforts undertaken and the progress made under the above referenced VCA. These efforts have resulted in a significant reduction of contaminants in the Methylene Chloride Area (MCA) primarily through the operation of a remedial treatment system (Multi- Phase Recovery System) from July 2006 to July 2010.

This Report documents the effectiveness of the implemented remedial actions, which have resulted in remediation to levels within the MCA which are acceptable to public health and the environment for the current and future industrial or commercial contemplated uses.

¹ The NYSDEC subsequently assigned Site Code V00126-8 to the facility.

2.0 BACKGROUND

In 1996 Medeva Pharmaceutical Manufacturing Inc. (a UCB predecessor) purchased a manufacturing and research facility located at 755 Jefferson Road in Henrietta, New York (the "Property") from Rhone-Poulenc Rorer ("RPR"). During Medeva's pre-acquisition due diligence, it was discovered that prior operations on the Property had resulted in releases to the environment at two locations. Figure 1 shows the location of both areas of concern relative to the entire property. Thereafter, a Voluntary Cleanup Agreement (VCA) (Index Number D8-0001-97-07) was entered into by Medeva Pharmaceuticals Manufacturing, Inc. and the New York State Department of Environmental Conservation (NYSDEC, 1998).

2.1 THE METHYLENE CHLORIDE AREA

Previous site investigations identified an area of concern on the west side of Building #3 in the vicinity of a former 2,600-gallon Methylene Chloride aboveground storage tank (AST). The area has been designated as the "Methylene Chloride Area" or "MCA" (Figure 2). Soil and groundwater in the vicinity of the MCA (most of which is beneath Building 3) were impacted by historical release(s) of Methylene Chloride most likely due to overfilling of the AST.

A multi-phase recovery system (MPRS) was installed to remediate the MCA. Figure 2 shows the location of the MPRS and associated recovery and monitoring wells. The MPRS was operational from July 2006 to July 2010 to remove Methylene Chloride and other MCA-related Volatile Organic Compounds (VOCs) from both the soil and groundwater. The MPRS system exerts a high vacuum throughout the MCA source area. The system was installed in accordance with the following documents prepared for UCB and approved by the NYSDEC:

- Consolidated Remediation Work Plan, dated April 2002 (ERM, 2002a);
- Methylene Chloride Area (MCA) Remedial Design Investigation Work Plan, dated August 2002 (ERM, 2002b);
- Remedial Action Selection Report, dated October 2002 (ERM, 2002c); and
- Response to NYSDEC comments on the MCA Remedial Design Investigation, dated 12 December 2002 (ERM, 2002d).

The comprehensive remedial actions implemented at the MCA are detailed in the pending Methylene Chloride Final Engineering Report (MCA Remedial FER) (ERM 2008).

2.2 IMPLEMENTATION OF THE MCA OM&M PLAN

The MPRS system is being operated and monitored in accordance with the pending Methylene Chloride Area Multi-Phase Recovery System Operations, Maintenance, and Monitoring Plan (MCA OM&M Plan) (ERM 2007), which was submitted as part of the MCA Remedial FER. The monthly status reports and quarterly Environmental Effective Monitoring Reports submitted to NYSDEC detail the operation and maintenance of the system and they are included in this report by reference. The most recent of these reports are included in Appendices A and B. After subsequent discussions with NYSDEC and as more experience was gained with operating the MPRS, a modification of the OM&M Plan was submitted (Proposed Addendum to the Draft Operations, Maintenance & Monitoring Plan) (Quantum, 2007) to allow for the system to be optimized. Subsequently, in 2009 NYSDEC approved a pulsing test program as a part of a pre-shutdown phase.

Although the Department has not yet formally approved the OM&M Plan, it is UCB's understanding that the MCA OM&M Plan is approvable. All questions raised by NYSDEC on the OM&M Plan and on the MPRS system have been addressed in a timely manner. Status reports have been submitted to NYSDEC on a monthly basis which provides details of the operation and maintenance of the system. No comments

have been received from NYSDEC concerning actions being taken under the MCA OM&M Plan.

3.0 ACHIEVEMENT OF THE REMEDIAL ACTION OBJECTIVES

NYSDEC Technical and Administrative Guidance Memorandum (TAGM #4046) dated November 1992, as revised January 1994, served as the basis for setting the NYSDEC approved soil cleanup goals and remedial objectives for Site soils. The Clean-up objectives were established based on the relative toxicity and carcinogenicity of the affected media, the protection of ground water based on the soil partitioning theory and by comparison with background samples. The Site-specific recommended soil cleanup objectives (RSCOs) for organic compounds at the Site were presented in the Addendum to the Consolidated Remediation Work Plan (the Methylene Chloride Area Remedial Design Investigation Work Plan, ERM, 2002b), and were subsequently approved by NYSDEC in a letter dated 19 December 2002. The RSCOs were intended to result in unrestricted future use of the property if they were achieved. The Site-specific RSCO for methylene chloride in soil is 26 µg/kg.

The underlying cleanup goal for Site ground water is to meet NYSDEC ambient ground water standards as established in 6 NYCRR Part 703 which would allow for unrestricted use of the groundwater beneath the Site. The ambient water quality standard for Methylene Chloride is 5 µg/l (ppb). Trace concentrations of other VOCs have been identified in groundwater monitoring wells at the MCA. Although these compounds did not drive the remediation, ambient water quality standards were used as remedial objectives to address any compounds identified above standards in the MCA.

Based on data collected to date, these Remedial Action Objectives (RAOs) for unrestricted use of the property will not be achieved in the mid-depth soils in the immediate MCA source area for some time into the future. Until then, the Department approved Site Management Plan requires the implementation of Deed Restrictions and

Institutional Controls which are intended to prevent uncontrolled exposure to potentially elevated levels of the site-related constituents.

The following subsections provide a summary of the evaluation process conducted to illustrate achievement of remedial objectives for the MCA.

3.1 ACHIEVEMENT OF 95 PERCENT OR GREATER MASS REDUCTION

Data and modeling obtained during the Methylene Chloride Area (MCA) Remedial Design Investigation (RDI) projected that approximately 171 pounds of Methylene Chloride was present in the subsurface in the MCA prior to remediation. Based upon the totality of information collected during the investigation and remediation, there is no evidence that any significant mass of Methylene Chloride in the DNAPL phase exists within the MCA. An estimated 27 pounds of Methylene Chloride was removed from the sub-surface during the MPRS start-up testing period. This equates to approximately 16 percent of the estimated mass of Methylene Chloride present in the MCA subsurface. An estimated total of 138 pounds of Methylene Chloride, including the 27 pounds recovered during the start-up period, has been removed by operating the MRPS. Based on these numbers, approximately 81 percent of the volume of Methylene Chloride has been removed.

Based on data collected to date, 95 percent reduction of the estimated mass will not be achieved through continued operation of the system. It is likely that the 171 pound estimate was: too high, that the measurement of Methylene Chloride in the MPRS influent, which was only done periodically, missed some higher levels of removed Methylene Chloride and/or that some of the residual Methylene Chloride is trapped, possibly within the relatively high void space that is poorly interconnected (i.e., high permeability but low porosity) typical of the indigenous clay-rich soil, making it virtually impossible to remove through any reasonably feasible and practical active removal technology.

3.2 ACHIEVEMENT OF ASYMPTOTIC CONTAMINANT REMOVAL RATES

Figure 1 of each of the monthly progress reports provides a graph comparing the total VOC mass removed over time (Appendix A). The more recent reports show that the cumulative total of mass removed has leveled off indicating that asymptotic conditions have been achieved. The results of the Methylene Chloride recovery rates while pulsing the system on for seven days while shutting the system off for periods ranging from 48 hours to four weeks confirmed that extended pulsing of the MPRS System would not sustainably increase the asymptotic removal rates. A more extensive evaluation of how it was determined that the MPRS has reached asymptotic removal rates is included in Section 4.2.1 of this document.

3.3 EVALUATION OF METHYLENE CHLORIDE REMOVAL RATES ACROSS THE MCA

An estimated total of 10 pounds of Methylene Chloride have been removed by operating the MPRS since October 15, 2008. Since this date the removal rate has become significantly lower, ranging from 0.004 to 0.0008 pounds of Methylene Chloride per hour of MPRS operation. The removal rate for Methylene Chloride over the last six months was approximately 0.0012 pounds per hour of operation resulting in a total of approximately one pound Methylene Chloride removed.

These removal rates have remained consistently low regardless of continuous or pulsed operation of the MPRS.

3.4 CONSISTENCY IN CONCENTRATION PATTERNS BEFORE, DURING, AND AFTER PULSED OPERATION OF THE SYSTEM

As shown in the monthly reports for 2009, the Methylene Chloride concentration patterns in MCA groundwater have remained consistently low before, during and after pulsed operation of the system which began in April of 2009, with the exception of the

groundwater in close proximity to three intermediate depth wells in the original source area.

3.5 DEMONSTRATION THAT CONTINUED OPERATION IS NOT TECHNICALLY AND/OR ECONOMICALLY FEASIBLE BASED ON SYSTEM PERFORMANCE AND/OR SITE CONDITIONS

Continued operation of the MPRS is technically feasible, but has become prohibitively expensive. Operations and maintenance costs for the MPRS are estimated to be \$717 per day. The average removal cost over the last six months of continuous operation is estimated at \$170,757 per gallon of Methylene Chloride recovered. Based on these values, the average estimated cost of VOC recovered over the last three months of continuous operation of the MPRS was in excess of \$20,000 per pound or \$223,000 per gallon.

3.6 SUMMARY OF EVALUATION OF MPRS SHUTDOWN CRITERIA

Asymptotic conditions have been reached with regard to the removal efficiency of the MPRS. A pulsing test period was conducted to confirm that the removal efficiency can no longer be improved; a summary of these findings are included within the MPRS Pulsing Test Summary Report (MPTR) which was submitted to the Department in August 2009. The MCA FER OM&M Plan includes a list of these parameters described above that, if attained, allow the Volunteer to request to shut down the MPRS and decommission the system.

As discussed in more detail in Section 4.1.1 of this document, with exception to low-level residual contamination the groundwater RAOs are currently being met. Further, it is concluded that no further collection and treatment of ground water is needed because:

- the bulk of this water already meets the RAO,

- there are no known users of groundwater on-site or cross or downgradient of the Site (such use would be contrary to Town of Henrietta regulations),
- the area of impact is currently, and has been stable and has not shown any indication of migration,
- the area of impact is a substantial distance from the nearest downgradient offsite location, and
- the Institutional Controls which are discussed in the site SMP will provide another layer of protection to insure that on-site groundwater is not used until it is demonstrated that its quality consistently meets the applicable MCA RAOs.

4.0 EVALUATION OF SITE SPECIFIC CONDITIONS IN COMPARISON TO §6.4 OF REVISED DRAFT DER-10.

While DER-10 is now final the sections below are essentially changed when compared to the Revised Draft DER-10.

Based on information provided in this and prior reports, the MCA has been successfully remediated in accordance with the VCA and the approved Remedial Work Plans. Thus, the operation of the MPRS can be permanently discontinued.

This closure request is based, in part, on the revised NYSDEC Draft DER-10 Technical Guidance (NYSDEC 2009) which provides Remedial Process Closure Requirements for evaluating whether the remedial treatment system is ready for closure even in cases where localized exceedances of the Remedial Action Objectives (RAOs) may remain following extensive active remedial efforts if certain conditions have been met. Revised Draft DER-10 §6.4(a)(2) states that²:

² Shaded boxes contain applicable excerpts from the November 2009 revised draft DER-10.

Dependent on site-specific considerations, site closure may be initiated, with prior DER approval, before the SCGs [Site Clean-up Goals] have been met when it can be demonstrated, as appropriate for the site contaminants, that certain conditions have been met.

The following sections of document demonstrate that approving the shutdown and closure of the MCA MPRS is appropriate and would be consistent with the recent guidance in the revised draft of DER-10.

4.1 REMEDIAL PROGRESS USING THE REMEDIAL TREATMENT SYSTEM

The MCA MPRS has been used for the following:

- As a groundwater treatment system; and
- As a soil management system.

The approved remedial measures within the MCA were not meant to act as a:

- Monitored Natural Attenuation remedy;
- Plume Management measure; or
- A drinking water treatment system.

Thus, sections 6.4 (a) and (b) are the sections of the revised draft DER-10 that potentially apply to the closure of the MCA remediation system.

(Revised Draft DER-10 Section 6.4 (a)) *A remedial process is considered completed when effectiveness monitoring indicates that the remedy has achieved the remedial action objectives identified by the decision document. When this occurs, the treatment system can be shut down and/or monitoring of a ground water and/or soil vapor plume can be terminated.*

(Revised Draft DER-10 Section 6.4 (b)) *Shutdown of groundwater treatment systems. The steps in the determination by the DER that continued operation of a remedial treatment system is no longer effective and the system can be shut down as having achieved a bulk reduction in contamination. Groundwater treatment systems addressed in this subdivision include both systems designed to treat the contaminated groundwater and systems to treat soil contamination which is the source of groundwater contamination.*

Remedial actions related to groundwater contaminated with volatile organic compounds (VOCs) have been substantially completed in accordance with the approved *Remedial Action Selection Report (RAS)* (ERM 2002c) as further described below, and were detailed in the MCA Remedial FER. Operation and maintenance of the system was carried out as detailed in the Methylene Chloride Area Multi-Phase Recovery System Operations, Maintenance, and Monitoring Plan (ERM 2007 and its subsequent update).

Groundwater VOC remedial actions began in July 2006. Since January 2007, progress related to remediation in the MCA has been reported to the NYSDEC on a monthly basis. Appendix A contains the most recent monthly report, exclusive of the laboratory data. The Site's remedial progress has been measured by the changes in Methylene Chloride concentrations in on-site monitoring wells, and by system performance data including influent groundwater and vapor VOC levels and contaminant mass removal quantities.

4.1.1 The Bulk of the MCA Contaminants Have Been Removed

a. **(Revised Draft DER-10 §6.4 (a)(2)(i))** *The remedy has achieved the bulk reduction of groundwater contamination, as set forth in [revised draft DER-10] subdivision 4.1(e);*

Site-specific Facts

- The on-site remedial treatment system consists of an MPRS and related vapor and water treatment system. Through October 2009, approximately

138 pounds of VOCs have been removed since the System started operating in 2006.

- Until July 2010, the MPRS operated basically continuously in a pulse mode using a short term well rotation system since system start-up in July 2006.
- During the first quarter of 2007, MPRS influent groundwater Methylene Chloride concentrations after System start-up were approximately 3,245 µg/L; Methylene Chloride concentrations in influent groundwater dropped to 28.5 µg/L (> a 99% decline) during October 2009, even though only the wells near areas containing residual dissolved phase Methylene Chloride were being pumped (hence they were not being diluted by also doing recovery from clean wells).
- Shallow (< 30 feet below ground surface (bgs)) and deep (>50 feet bgs) groundwater has remained at or near the 5 µg/L Methylene Chloride clean-up level established pursuant to the VCA.
- Methylene Chloride levels in groundwater at the intermediate depth (30 to 50 feet bgs) are clean throughout much of the MCA and significantly reduced in the two remaining source areas. These remaining source areas are, in essence, the remaining pockets of the two Methylene Chloride soil source areas that were identified during the investigation, data evaluation and modeling which led to the approved MCA Remedial Plan. The location of both of these areas is in the intermediate groundwater depth immediately outside Building 3 where the former Methylene Chloride tank was, and the adjacent and immediately downgradient area under the Building 3 slab. Methylene Chloride groundwater contamination does not appear to have migrated very far from the original source location.

- Methylene Chloride levels in MW-D8, which has historically exhibited the highest concentrations, have decreased by six orders of magnitude as of July 2011.
- Except in the remaining residual pocket areas, the groundwater RAOs are being met.
- With respect to the referenced Revised Draft DER-10 § 4.1(e) criteria (“other considerations for soil contamination”), available data indicate that:
 - MCA-related soil contamination has not migrated past the downgradient/cross gradient edges of Building 3 and hence the adjacent commercial/industrial off-site properties have not been impacted by this contamination from the MCA.
 - There are no surface water bodies in or adjacent to the MCA, so it was never necessary to undertake measures to protect these resources (including public health). Further, no aquatic resources located on or near the Site have been identified which could be negatively impacted by groundwater carrying residual contamination in the MCA.
 - Because the majority of the MCA is paved or under Building 3, there is little chance of direct exposure to the residual contamination, unless significant excavation is done in the residual source areas. An Excavation Plan is included in the Site Management Plan to address this possible pathway. While there is one small unpaved area, the fact that the shallow groundwater (and soil) in this area has always been clean indicates that even if surficial sediment was picked up by run-off or as dust, it would not carry any significant MCA-related contamination with it.

4.2 EVALUATION AGAINST THE REMEDIAL TREATMENT SYSTEM SHUTDOWN CRITERIA INCLUDED IN §6.4 OF REVISED DRAFT DER-10.

4.2.1 Overview

According to Draft DER-10 §6.4, the determination by NYSDEC that continued operation of a remedial treatment system is no longer effective and the system can be shut down, is governed by the following evaluation of system performance.

a. **(Revised Draft DER-10 §6.4(a))** *Dependent on site-specific considerations, site closure may be initiated, with prior DER approval, before the SCGs [Site Clean-up Goals] have been met when it can be demonstrated, as appropriate for the site contaminants, that*

ii. *it would not be feasible to continue operation of the remedy, provided:*

(1) *the remedy has been properly implemented;*

Site-specific Facts

- The pending MCA Remediation FER documents that the MCA MPRS was installed in accordance with the following documents prepared for UCB and approved by the NYSDEC:
 - Consolidated Remediation Work Plan, dated April 2002 (ERM, 2002a);
 - Methylene Chloride Area (MCA) Remedial Design Investigation Work Plan, dated August 2002 (ERM, 2002b);
 - Remedial Action Selection Report, dated October 2002 (ERM, 2002c); and

- o Response to NYSDEC comments on the MCA Remedial Design Investigation, dated 12 December 2002 (ERM, 2002d).
- The pending OM&M Plan sets out how the MPRS was to be operated and the system has been operated accordingly. UCB understands that that Plan is approvable, and the OM&M FER portion of this report documents that the system has been operated in accordance with this Plan.

(2) *it has been optimized to its fullest extent;*

Site-specific Facts

- Until August 2010 the MPRS was operated continuously (except for planned and emergency maintenance activities) in a pulse mode using a short term well rotation system, since the beginning. Initially, rotation/pulsing was performed on four groups of wells. Through on-going optimization efforts, this was eventually reduced to two alternating groups of wells focusing on areas of greatest concern. After meeting with DER representatives in March 2009, the list of recovery wells being pumped was further reduced to three wells in or near the remaining source area pockets within the intermediate depth groundwater zone which still had Methylene Chloride levels in groundwater above the Remedial Action Objectives.
- Figure 1 in the monthly report graphically depicts the successful continuous optimization efforts. The June 2010 monthly report is included in Appendix A.

(3) *it could not be otherwise modified to improve or achieve the required performance; and*

Site-specific Facts

- Consistent with the pending OM&M Plan, recovery through the various recovery wells has been rotated throughout the operation of the MPRS, with one of the goals of this rotation being to “pulse wells to maximize Methylene Chloride recovery rates”.
- The pulsing test which was initiated in April 2009, and the on-going extended pulsing schedule (1 week pumping followed by 4 weeks of non-pumping) was the most recent (and final) effort to improve the Methylene Chloride recovery by the MPRS system. The extended Pulsing Test has confirmed that the rotation of the recovery wells has, in fact, already maximized the Methylene Chloride recovery.
 - As the Report of the Pulsing Test concluded, “Methylene Chloride concentrations in groundwater showed an overall decrease across the site during the June sampling event, after the first 3 cycles of pulsing and exhibited no signs of rebound to that point in time.”
 - No other possible MPRS modifications or improvements have been identified which could improve Methylene Chloride removal rates.

(4) in no case should site closure be considered if it will create a public health exposure or environmental impact, unless the exposure or impact can be mitigated by other means.

Site-specific Facts

No public health exposures or potential environmental impacts will occur if the MPRS is shut down for the following reasons:

- The residual contamination is geographically isolated in the intermediate depth zone (approximately 30 feet below ground surface) beneath the footprint of Building 3.
- The Soil Disturbance Plan included in the Department approved SMP (Appendix D) is intended to prevent the residual Methylene Chloride (and any other MCA-related constituents) from causing future public health exposure at levels of potential concern or environmental impact in the event Building 3 is removed.
- Methylene Chloride groundwater contamination is not moving beyond the MCA area (which is in the interior of the Site) at levels above RAOs/Groundwater standards. The areal extent of Methylene Chloride contamination has remained localized to the vicinity of the MCA over a period of at least 14 years.
- There is no complete pathway for off-site exposure to contaminated groundwater or soil from the MCA because there is no Methylene Chloride at levels above the RAOs downgradient of the MCA, let alone moving offsite.
- Town of Henrietta zoning and development regulations restrict the usage of properties along this section of Jefferson Road to industrial/commercial and all developed properties must connect to the public water supply. These existing regulatory requirements will be reinforced by the Institutional Controls (limiting property usage to industrial/commercial and prohibiting the use of groundwater) which have been implemented within the Department approved SMP and the recorded Deed Restriction.

With respect to the infeasibility of continued operation condition:

ii. it would not be feasible to continue operation of the remedy

The conditions under which a closure based on the infeasibility of continued operation of the MPRS have been met.

Site-specific Facts

- During the first quarter of operation of the MPRS, the mass removal rate was 0.016 pound of VOC per hour. This rate had dropped to only 0.0011 pound of VOC per hour by the fourth quarter of 2009 (a 93% reduction).
- Investigation and remediation of the B2SA and MCA has cost in excess of \$5.3 million to date. Considering the asymptotic levels of mass removal (discussed in section B below), the cost of continued operation of the System is not economically justifiable, making continued operation infeasible.
 - Operations and maintenance costs for the MPRS are estimated to be \$717 per day (including labor, energy and discharge fees) while achieving marginal, if any, environmental benefit.
 - The average estimated cost of VOC removal was in excess of \$20,000 per pound over a recent 3 month period. Expressed in gallons, the average cost over the last six months is estimated to be \$170,757 per gallon of Methylene Chloride removed.

4.2.2 Asymptotic Removal Rates have been Demonstrated

1. **(Revised Draft DER-10 § 6.4(b) (1) and (2))** *(1) Asymptotic removal rates. Continued system operation may be reevaluated after reaching low-level asymptotic removal rates. (2) No specified shutdown criteria. If the remedy has not incorporated specific shutdown criteria for the remedial system, the following methodology is recommended to evaluate whether permanent system shut down conditions have been reached:
 - i. when operational data indicates that a remedial system has reached asymptotic removal rates, as discussed in paragraph 1 above, the system should be pulsed (i.e., cycled on and off) for a specified period. Additional data is to be collected to evaluate how the period of inactivity has impacted contaminant concentrations [for example, how does the data compare to pre-shut down conditions, and how did the system react when restarted?]:
 - (1) an increase in concentrations when the remedial treatment system is re-started indicates that the system may continue to be effective in removing contaminants using a pulsing schedule;
 - (2) Overall declines with no significant rebounding in Methylene Chloride levels in groundwater are evident as shown in Table 1 (Appended).
 - (3) if the post-shutdown removal concentrations are the same as the pre-shutdown concentrations, then the system can be considered to no longer be removing a significant level of contaminants, and it may be appropriate for the DER to consider shutdown of the system;
 - (4) a decrease in contaminant levels in adjacent groundwater monitoring wells during shutdown may also correlate to decreasing levels in the surrounding saturated contaminated soils. This may also be considered by the DER in justifying remedial system shutdown; and
 - (5) decreases in soil vapor concentrations.*

Site-specific Facts

- The mass removal rate dropped to only 0.0012 pounds of VOC per hour (approximately 0.204 pounds for the one week pulsed operating period)

during October 2009. This compares to 0.0019 pounds per hour in March 2009, the month before the pulsing program began.

- As approved by NYSDEC, a pulsing pilot test was conducted from April 13, 2009 through July 6, 2009 and consisted of four MPRS operation and shut down cycles. Details regarding the system operation and data collected are outlined in the MPRS Pulsing Test Summary Report, which is included in Appendix C. The purpose of performing the pulsing program was to verify that asymptotic conditions have been achieved by the MPRS and to ultimately obtain regulatory closure of the MCA remediation.
 - The Pulsing Program confirmed that, even after 4 weeks of shutdown and then restarting the system, there was no sustained difference in post and pre-shutdown concentrations. As demonstrated by the results of the pulsing program (see Appendix C), the monitoring data collected during the pulsing program indicates that there is negligible gain in recovery efficiency by pulsing the system. Total VOC recovery rate for each pulsing cycle is comparable (or less than) the mean recovery rate for the last six month period of MPRS operation prior to the pulsing program. The data confirms that the MPRS has reached the asymptotic limit for effective removal of Methylene Chloride.
- Figures 3 and 3A in the monthly report (see the January report in Appendix A) tracks the soil vapor mass removal rates from system start up (Figure 3) and over the subsequent year (Figure 3A). Vapor mass removal rates continued to decline, despite the extended pulsing which had been on-going since mid-April. During the actual pulsing test, the vapor removal rate remained at less than 0.005 pounds per hour, except for an initial, unsustained upward trend the first day the system was pulsed (April 2009). In contrast, in 2006, shortly after MPRS start-up, the mass soil vapor recovery rate was just under 0.010 pounds per hour.

d. **(Draft Revised DER-10) §6.4(b)2.ii.(1)** *When the mass of contaminant(s) extracted over time and the groundwater monitoring data are graphically recorded to illustrate the effectiveness of system operation and the influence of pulsing on the system:*
(1) *a minimum of eight groundwater approved data sets are typically necessary to statistically demonstrate within 95% confidence limits that asymptotic conditions have been reached. Alternative non-parametric statistical tests may be proposed. The DER will determine the acceptability of such tests on a case-by-case basis; and*

Site-specific Facts

- Graphical depictions for the decline in Methylene Chloride contamination in all Site monitoring wells has been included in the Quarterly Environmental Effectiveness Reports. Appendix B contains the most recent report, exclusive of the underlying monthly reports and the actual laboratory data sheets.

e. **(Draft Revised DER-10) §6.4(b)2.ii.(2)** *generally, a system treating soil impacting groundwater will not be shut down until:*
(A) *the contaminant levels in soil samples are near or below the soil cleanup objectives for the protection of groundwater;*
(B) *groundwater standards have been met at the property line(s); and*
(C) *contamination levels beyond the site property boundary(s) will no longer be at levels which threaten public health and/or the environment;*

Site-specific Facts

- The MPRS has been treating both groundwater and soil.
- Soil remediation has been accomplished through the lowering of the water table within the MCA followed by the extraction of contaminated soil vapor. As shown in the monthly reports, the bulk of the recovered Methylene

Chloride has been in the soil vapor phase, indicating that substantial soil remediation has been accomplished.

- Work done as a part of the MCA RDI confirmed that the MCA contaminants of concern in groundwater were below the established RAOs at the downgradient boundaries of the MCA which is in the interior of the site. (See Table 1 and Figures 2-5.)
- Directional drilling done in the north and east of the MCA as a part of the MCA RDI confirmed the extent of soil contamination was limited to within the MCA and, thus, to the interior of the site. Interpreted soil contaminant distribution maps are included within the May 2007 Final [Remediation] Engineering Report (ERM).
- To confirm that levels of the MCA constituents of concern downgradient of the MCA have remained below the RAOs, three sentinel wells (MW-23S, MW-23I and MW-23D) have been installed and monitored quarterly as part of the Post Closure Monitoring Plan. Dissolved-phase VOCs have remained below the RAO's since installation their installation in December 2010.
- Soil samples have been collected as part of the Post Remedial Site Investigation. Based on the findings of this investigation, adsorbed-phase VOC concentrations in soil have remained stable or decreased within the MCA. Details of the Post Remedial Site Investigation are included within the Post Remedial Site Investigation Report (Kleinfelder 2011).
- Levels of the MCA Constituents of Concern have never been at levels which threaten public health and/or the environment beyond the site property boundary(s).

f. **(Draft Revised DER-10) §6.4(b)2.iii)** *At the point when system performance has reached asymptotic conditions, soil samples are to be collected from borings or test pits placed at the source area and/or the property boundaries, as approved by the DER, and compared to applicable soil clean-up levels.*

Site-specific Facts

- To confirm that levels of the MCA constituents of concern downgradient of the MCA have remained below the RAOs, three sentinel wells (MW-23S, MW-23I and MW-23D) have been installed as part of the Post Closure Monitoring Plan. Dissolved-phase VOCs have remained below the RAO's since installation their installation in December 2010. Furthermore, adsorbed-phase VOCs were not observed in the field during the installation of the downgradient three-well cluster.
- Soil samples have been collected as part of the Post Remedial Site Investigation. Based on the findings of this investigation, adsorbed-phase VOCs in soil have remained stable or decreased within the MCA. Details of the Post Remedial Site Investigation are included within the Post Remedial Site Investigation Report (Kleinfelder 2011).

4.2.3 Conclusion - Summary Evaluation of Site Specific Conditions in Comparison to §6.4 of Revised Draft DER-10.

1. **(Revised Draft DER-10 at §6.4(b)(3))** *Request for shutdown of a remedial system. The remedial party or site owner may request approval from the DER to shut down all or a portion of a remedial treatment system. A request to shut down a system:*
 - i. *may be considered when:*
 - (1) *the applicable RAOs have been achieved;*
 - (2) *it is determined that contaminated groundwater can be discharged without further treatment; and/or*

(3) there is no significant downgradient impact, and further groundwater treatment is not necessary; and

Site-specific Facts

- As discussed in more detail in Section 4.1.1 above, with exception to residual contamination pockets, the groundwater RAOs are being met.
- No further collection and treatment of groundwater is needed because:
 - the bulk of this water already meets the RAO,
 - there are no known users of groundwater on-site or cross or downgradient of the Site (such use would be contrary to Town of Henrietta regulations), and
 - the Institutional Controls which are discussed in the proposed SMP (Appendix D) will provide another layer of protection to insure that on-site groundwater is not used (until it is demonstrated that its quality consistently meets the applicable MCA RAOs.)
- This report (including Appendices) details the basis for permanent system shutdown that includes all soil, vapor and groundwater data and pulsing information generated by the above evaluation.

2. **(Revised Draft DER-10 at §6.4(b)(4))** *Considerations for shutdown of a system. It is not appropriate to consider shutting down a system used to control contaminant groundwater plume migration (containment versus remediation), human exposures (e.g, soil vapor intrusion) or environmental impacts based on performance data alone. An understanding of site-specific contaminant fate and transport relative to sensitive receptors is essential for this type of determination.*

The potential human or sensitive environmental receptors that potentially could be exposed to the residual MCA-related contamination would be those which are exposed to soils within the limited remaining pockets of the source area at depths of approximately 30-50 feet below the surface. No known or suspected sensitive environmental receptors are present at this depth. The proposed Soil Disturbance Plan in the SMP is intended to control any future potential human exposure to contaminated soil in this limited area.

This Report documents the basis for permanent system shutdown. The MCA MPRS is not used to control contaminant groundwater plume migration (containment versus remediation), human exposures (e.g, soil vapor intrusion) or environmental impacts based on performance data alone and hence the above draft criteria is not applicable.

5.0 POST CLOSURE MANAGEMENT AND MONITORING

Once the MCA remedial system is permanently shut down, the Site will continue to be managed and monitored for some time to confirm that the concentration of Methylene Chloride in groundwater do not significantly increase. In addition, the potential for natural attenuation will be evaluated in conjunction with groundwater management and modeling. Appendix D contains the Department approved Site Management Plan.

5.1 INSTITUTIONAL AND ENGINEERING CONTROLS (IC/EC)

Institutional and engineering controls are detailed in the proposed revised Site Management Plan (Appendix D).

6.0 CLOSING AND MCA REMEDIAL CLOSURE REQUEST

The approved MCA Remedial Action Objectives are to:

1. *Allow the site to be used in an unrestricted manner to the extent feasible; or*
2. *At a minimum, eliminate or mitigate all significant threats to the public health and the environment”*

As for the first RAO, although some restrictions on the future use of the Site are proposed in the Site Management Plan (Appendix D), those restrictions will still allow the Site to be continued to be used for a broad spectrum of industrial or commercial purposes, consistent with the historic and current uses of the site as well as with applicable zoning and local groundwater restriction ordinances. Contamination within the second area (MCA) has always been limited to the intermediate depth (between 30 and 50 feet beneath land surface) and levels above the RAO/groundwater standards are further restricted to the immediate vicinity of the original sub-surface source areas. Only modest restrictions on future site usage are needed to ensure the continued protection of human health. Residual materials above the RAOs also have the potential to naturally attenuate over time.

As documented in this Report, Quantum concludes that the MCA has been remediated to a level which is protective of public health and the environment for the current and future industrial or commercial use assuming the ICs are implemented. This conclusion is based on the following:

- Groundwater concentrations of the site-related VOCs over the past twelve quarters are stable or declining and are generally at or below the VCA established clean-up numbers, which are the applicable State Groundwater Standards. As recently as March 2011 all monitoring wells were below applicable State Groundwater Standards. Further, the results from the sentinel wells indicated that that impacted groundwater within the MCA has not migrated beyond or even near the property boundary at levels above the applicable groundwater standards.;

- Remedial activities have been completed in accordance with the plan and schedule included in the pending OM&M Plan;
- Residual VOCs in the soil and groundwater are within a known area and are contained within very low permeability soils that, under current conditions and proposed restrictions, will not pose any unacceptable risk;
- As documented above, remedial process closure criteria in Revised Draft DER-10 have been materially met; and
- The Site will be subject to institutional controls that are protective of human health and the environment as outlined in the proposed revised Site Management Plan, including measures that address any potential for vapor intrusion, if Methylene Chloride is no longer used in the current manufacturing process and the existing tank and associated piping is emptied, closed, properly decommissioned and removed.

The effectiveness of the implemented remedial actions has been clearly demonstrated by the significant and sustained reduction in MCA-related contamination.

Based on the factors summarized in this request, all reasonable and practical measures have been successfully implemented to remediate the MCA in accordance with the pending MCA OM&M Plan. Therefore, we request that permanent shutdown of the remedial treatment system and remedial closure of the MCA be granted.

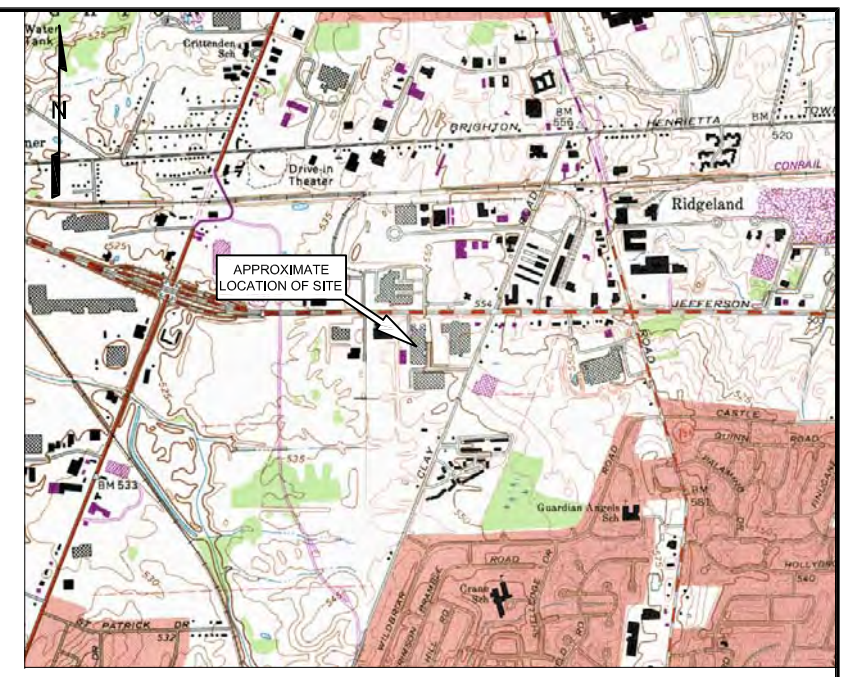
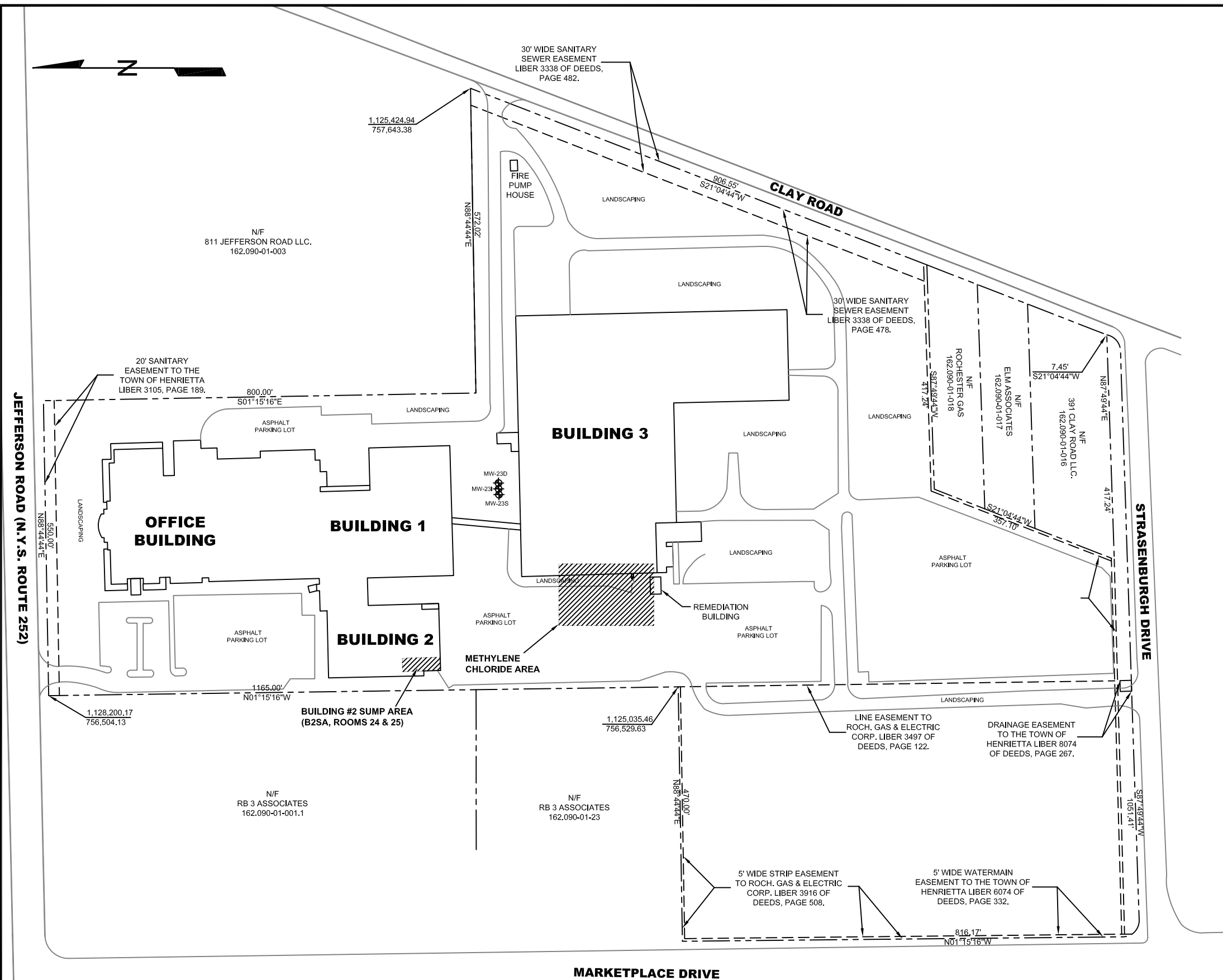
As a part of granting this close out request, UCB requests that the Department issue a written notification:

- Approving the pending MCA Remedial FER (including the amended OM&M Plan).
- Approving this FER and Certification.

6.1 MCA CLOSURE REQUEST

As demonstrated in this Report, the Remedial Action Objectives for the MCA site have been substantially met. Therefore, UCB requests that operation of the MPRS for the MCA be allowed to end and the system decommissioned.

FIGURES

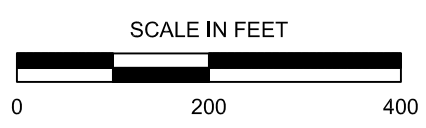


VICINITY MAP
SCALE 1"=3000'
USGS 7.5' SERIES TOPOGRAPHIC MAP:
PITTSFORD, NY QUADRANGLE

LEGEND

	PROPERTY LINE
	MONITORING WELL
	EASEMENT
	BUILDING
	CURB

REFERENCES:
1. "SUBDIVISION MAP" PREPARED BY PARRONE ENGINEERING, DATED 12/29/2006.



PROJECT NO.	105651
DRAWN:	01/19/10
DRAWN BY:	CTH
CHECKED BY:	AW
FILE NAME:	SANOFL_SEP09.dwg

SITE PLAN		1
UCB FACILITY NYSDEC VCP# V00126-8 755 JEFFERSON ROAD ROCHESTER		
MONROE COUNTY	NEW YORK	

NEWBURGH, NY

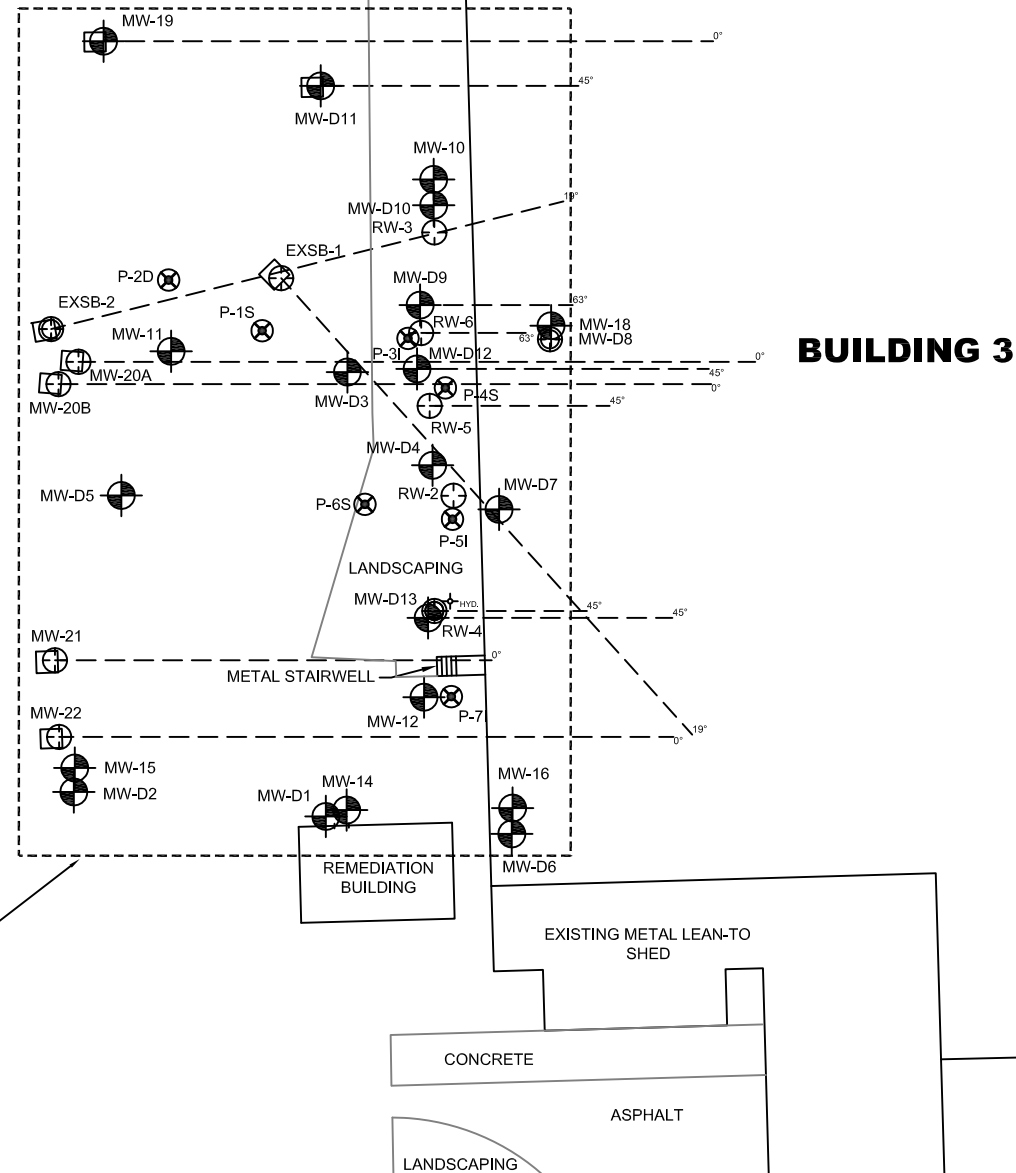
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MW-23S MW-231 MW-23D

LEGEND

- MONITORING WELL
- RECOVERY WELL
- PIEZOMETER
- VAULT
- FIRE HYDRANT
- ANGLD WELL (ANGLE MEASURED FROM GROUND SURFACE)



ASPHALT PARKING LOT

BUILDING 3

METHYLENE CHLORIDE AREA

REMEDIAATION BUILDING

EXISTING METAL LEAN-TO SHED

CONCRETE

ASPHALT

LANDSCAPING

SCALE IN FEET



UNDEVELOPED AREA

NEWBURGH, NY

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REFERENCES:

- "WELL LOCATION MAP" PREPARED BY ERM, DATED SEPTEMBER, 2006.
- KLEINFELDER FIELD RESEARCH.



PROJECT NO.	105651
DRAWN:	01/19/10
DRAWN BY:	CTH
CHECKED BY:	AW
FILE NAME:	SANOI_SEP09.dwg

METHYLENE CHLORIDE AREA

UCB FACILITY
 NYSDEC VCP# V00126-8
 755 JEFFERSON ROAD
 ROCHESTER
 MONROE COUNTY NEW YORK

FIGURE

2

APPENDICES

Appendix A

June 2010 Monthly Progress Report



July 9, 2010

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: Monthly Progress Report – June 2010
755 Jefferson Road Facility – Henrietta, New York
NYSDEC VCP Number V00126-8

***Key Actions
This Period:***

- **June 1 – June 30, 2010.** The system was intermittently operational in accordance with the NYSDEC approved pulsing plan.

Operations Metrics (June 14 – June 21)

- Operational Time: 170 out of a scheduled 170 hours of operation.
- Uptime Efficiency: 100%
- Volume of Groundwater Treated: 3,929 gallons.
 - Discharged to: The sanitary sewer system.
- Total estimated VOC mass recovered to date: 138.8 lbs.
- Total estimated VOC mass recovered during June: 0.036 lbs.
- Mean estimated VOC mass removal rate for June 2010 versus May 2010: 0.0002 versus 0.0003 lbs/hr.
- General weather conditions: Average precipitation and average temperatures as compared to historical data.

Tables, Figures and Graphs

- Table 1: June Treated Waste Water Flow/Vapor Monitoring Data.
- Table 2: June Recovery Well Rotation Data.
- Figures 1-9: Remedial Effectiveness and Efficiency Platform (REEP) graphs
- Figures 2A and 3A: Selected Remedial Effectiveness and Efficiency Platform (REEP) graphs showing results from April 2009 to present.

***Problems/
Resolutions:***

- None

***Analytical Data
Received:***

- The June 2010 MPRS liquid influent analytical data.
- The June 2010 MPRS liquid effluent analytical data. Analytical results are within MCPW permit requirements.
- The June 2010 MPRS vapor influent analytical data.

***Documents
Submitted:***

- Monthly Progress Report for May 2010 dated June 9, 2010.

**Anticipated
Actions –
July
2010:**

- Consistent with the draft closure request entitled Methylene Chloride Area Operation Maintenance and Monitoring Final Engineering Report and Petition for Remedial Closeout (Draft) submitted in April 2010 and as discussed at our meeting on May 4th, 2010, we request approval to terminate the pulsing program and terminate operation of the MPRS with the June week-long pulsing event being the last operation of the system.
- Email correspondence was sent to the Department on June 22, 2010 regarding upcoming well abandonment/paving activities at the site. If the Department is in agreement with our approach we would hope to begin the abandonment process as soon as possible in order to not interfere with the upcoming paving activities at the site.

Comments:

- The attached REEP information is to be utilized as a subjective representation of the overall effectiveness/performance of the system as we are using discontinuous data and PID measurements for the removal calculations. We do not intend this tool as a definitive summary of recovered mass.
- MPRS operation and efficiency, inclusive of the replacement LRP pump and associated upgrades and maintenance, will continue to be monitored.
- Submittal of the Draft MCA OM&M FER, Site Wide Petition for Remedial Closeout and revised Site Management Plan has been completed. Submittal of the final MCA OM&M FER, Site Wide Petition for Remedial Closeout and revised Site Management Plan is contingent upon final comments from the NYSDEC.

**NYSDEC-
Approved Field
Decisions:**

- Continuation of pulsing of MPRS system in accordance with the procedure presented to NYSDEC. Based upon discussions with NYSDEC, it is anticipated that the system will be pulsed during the month of June and then, if approval by the Department is given, shut down permanently.

If you have any questions regarding this monthly report or progress on the project, please don't hesitate to contact me at 513-314-7543 or rbethel@qmg-inc.com.

Sincerely,
QUANTUM MANAGEMENT GROUP, INC.



Rick Bethel
Senior Associate

Attachments

cc:

Mr. Jeffrey M. Kosmala, P.E. (MCDOH)
Mr. Michael Bogdan (Sanofi-Aventis)
Mr. Richard Ricci (Lowenstein Sandler PC)
Mr. Mark Byrne, P.E. (Town of Henrietta)
Ms. Libby Ford, (Nixon Peabody)
Mr. Greg Light (UCB)
Mr. George Hollerbach, P.E. (Quantum)

Ms. Melissa Menetti (NYSDOH)
Mr. David Panipinto (UCB)
Mr. Bart Putzig, P.E. (NYSDEC)
Mr. Sean Keenan (MCDES)
Mr. John Lang, P.E. (Quantum)

**TABLE 1 - TREATED WASTE WATER FLOW/VAPOR MONITORING DATA
MCA REMEDIATION SYSTEM
755 JEFFERSON ROAD, HENRIETTA, NEW YORK
NYSDEC VCP NUMBER V00126-8
June 2010**

Date	Time¹	Cumulative Hours²	Total Flow³ Gallons	Flow Rate⁴ Gal/Min	Cumulative Gallons^{5,6}	Influent PID (ppm)	Effluent PID (ppm)
5/26/2010	11:00	40440.0	127	1.2	338,389	0.1	0.0
6/14/2010	9:35	40440.5	11	0.4	338,400	0.4	0.1
6/14/2010	11:33	40442.4	293	2.6	338,693	0.2	0.0
6/16/2010	9:44	40488.6	1,663	0.6	340,356	0.4	0.0
6/16/2010	11:42	40490.5	185	1.6	340,541	0.1	0.0
6/18/2010	9:12	40536.0	767	0.3	341,308	0.2	0.0
6/21/2010	9:15	40608.1	792	0.2	342,100	0.1	0.0
6/21/2010	11:08	40609.9	218	2.0	342,318	0.1	0.0

¹Time of day (in military time) data was collected.

²Cumulative Hours represents the number of run-hours since MCA remediation system start-up on 12 July 2006.

³Total Flow in Gallons represents the flow that occurred since the time the last measurement was collected, as indicated in the previous row of the table.

⁴Flow Rate in Gallons/Minute represents the average flow rate since the time the last measurement was collected, as indicated in the previous row of the

⁵Cumulative Gallons represents the number of gallons of water treated by the MCA remediation system since start-up on 12 July 2006.

⁶Totalizer Flow readings collected from newly installed totalizer beginning October 2, 2007.

TABLE 2 - RECOVERY WELL ROTATION DATA
MCA REMEDIATION SYSTEM
755 JEFFERSON ROAD, HENRIETTA, NEW YORK
NYSDEC VCP NUMBER V00126-8
June 2010

Date	Well Rotation Clusters								
	EXSB-2	MW-D8	MW -21	MW-22	MW-20A	MW-20B	RW-6	RW-5	RW-4
June 1-13	System shut down as part of NYSDEC approved pulsing program								
June 14-June 21		X						X	X
June 22-30	System shut down as part of NYSDEC approved pulsing program								

Figure 1
MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
June 2010

Total VOC Mass Removed (Vapor and Ground Water Combined)

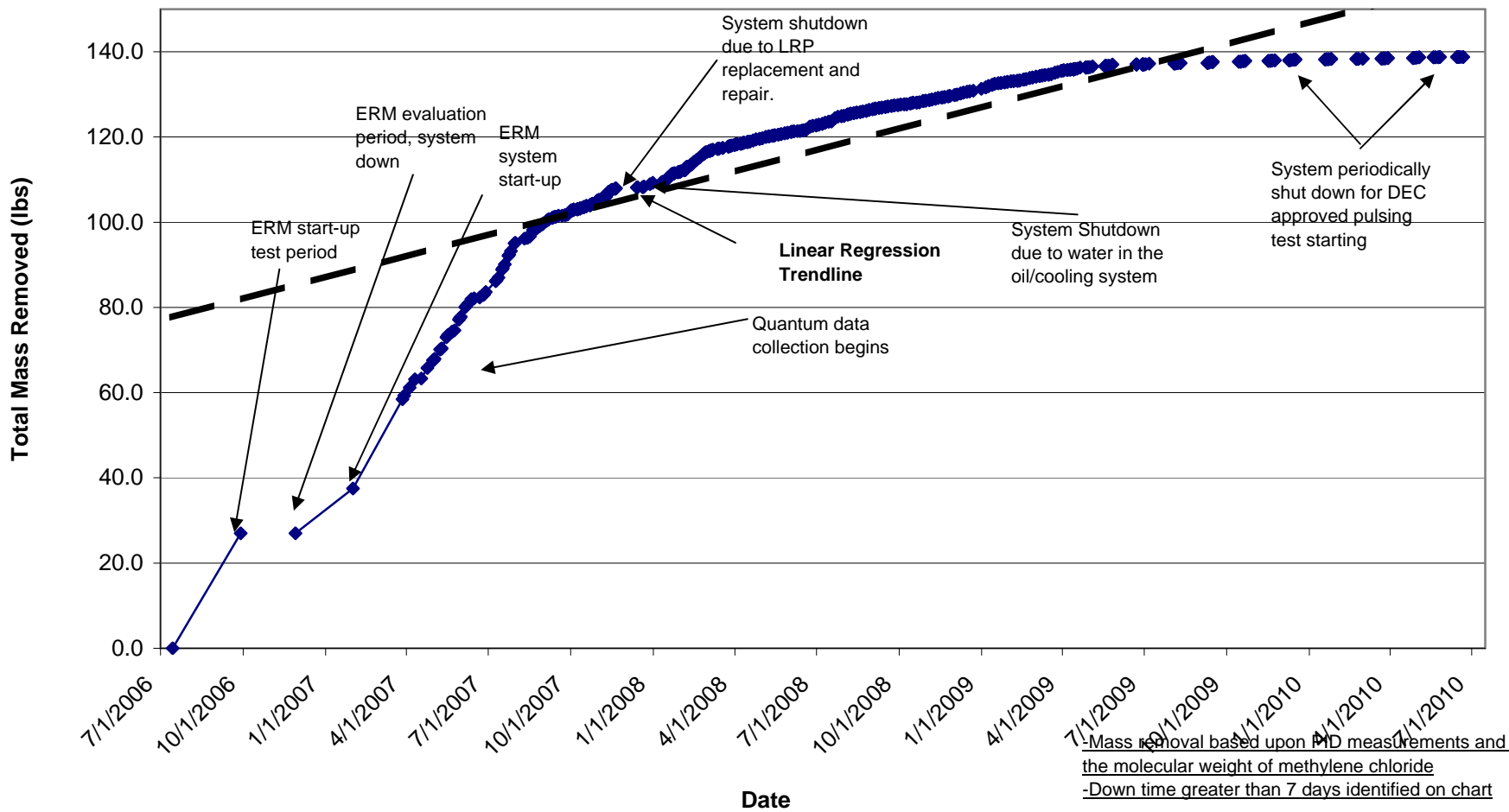


Figure 2
MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
June 2010

Total VOC Mass Removal Rate (Vapor & Ground Water Combined)

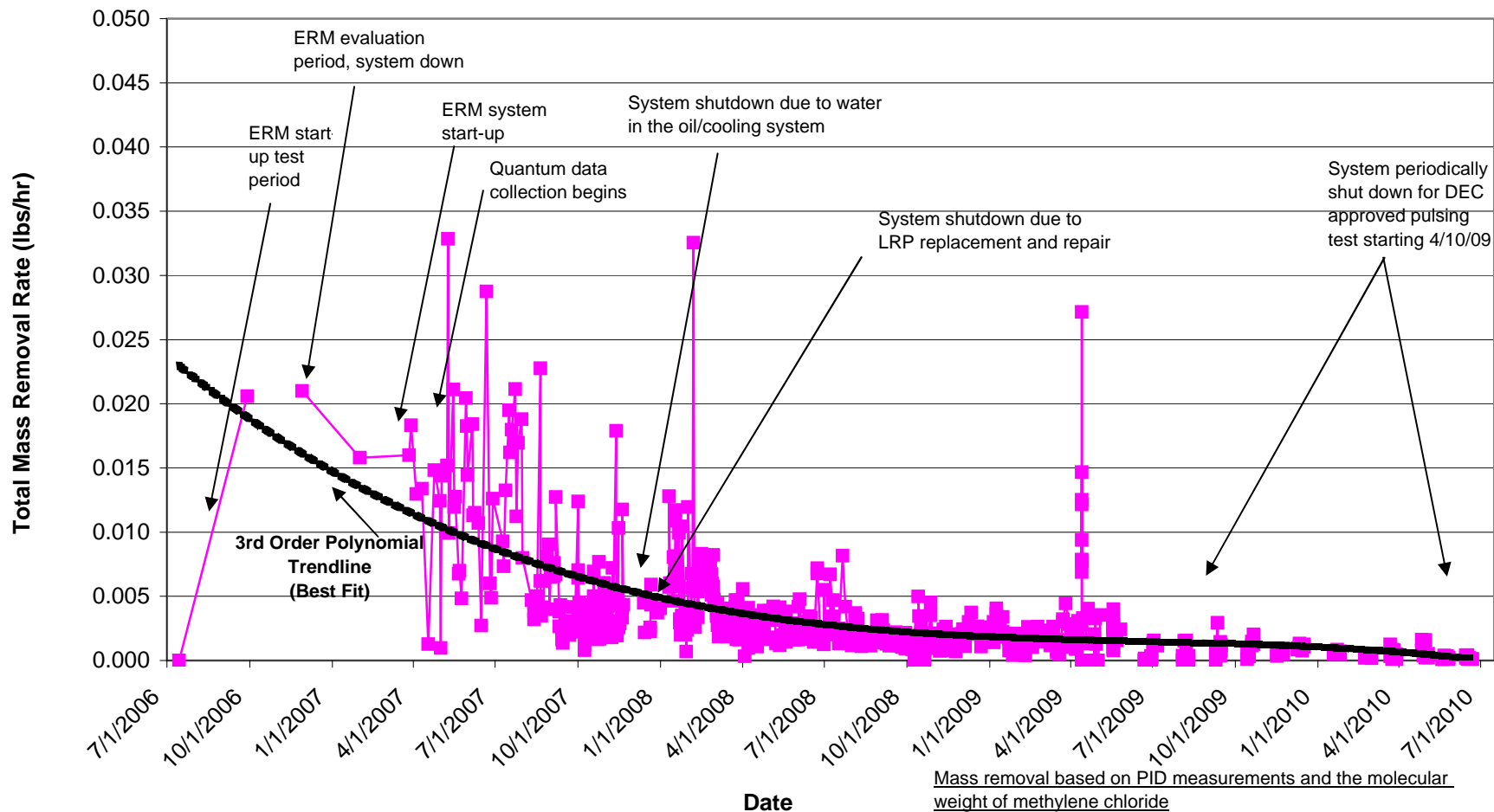


Figure 2A

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
June 2010

Total VOC Mass Removal Rate (Vapor & Ground Water Combined) Since April 2009

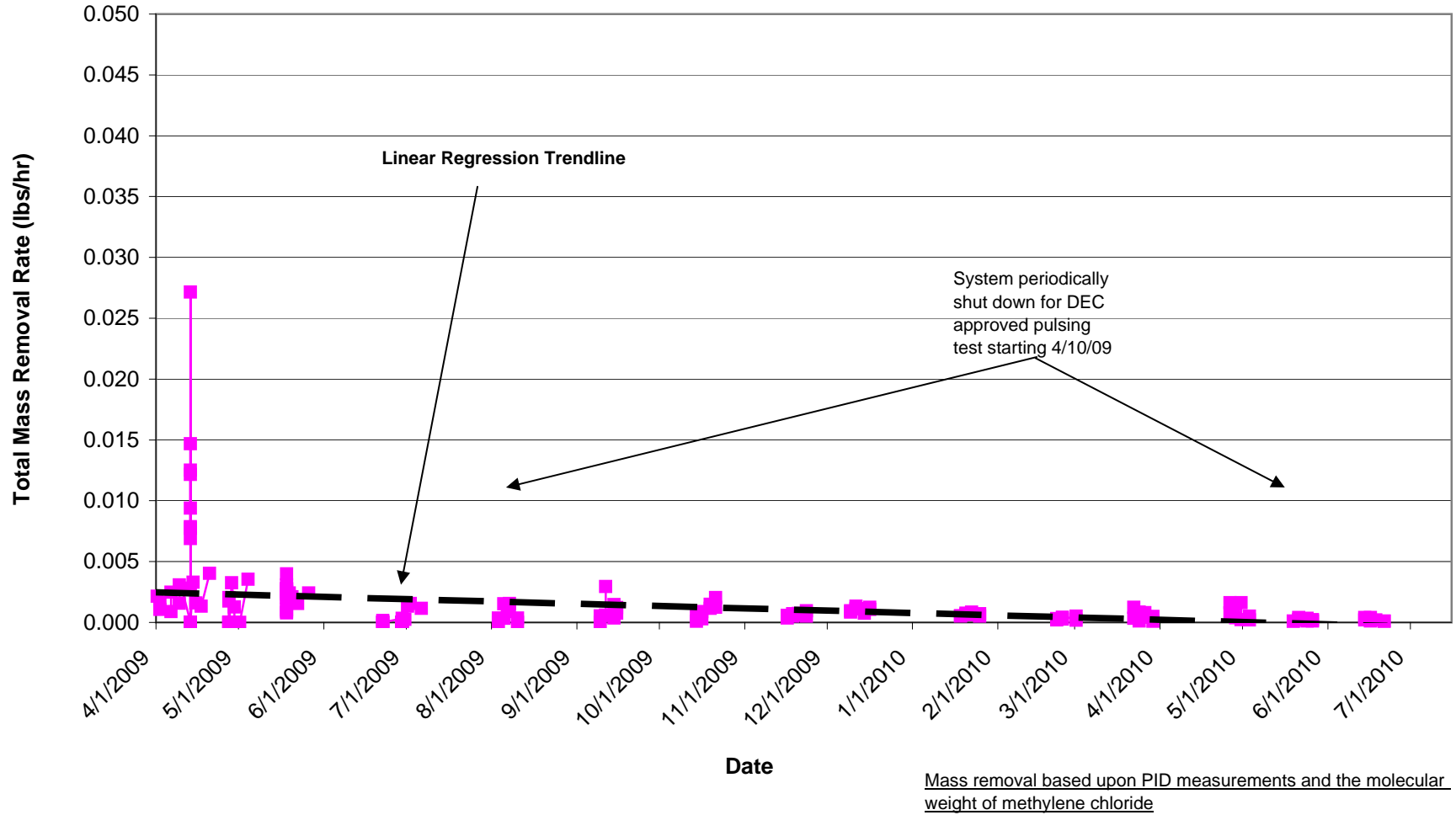


Figure 3

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
June 2010

Vapor Mass Removal Rate

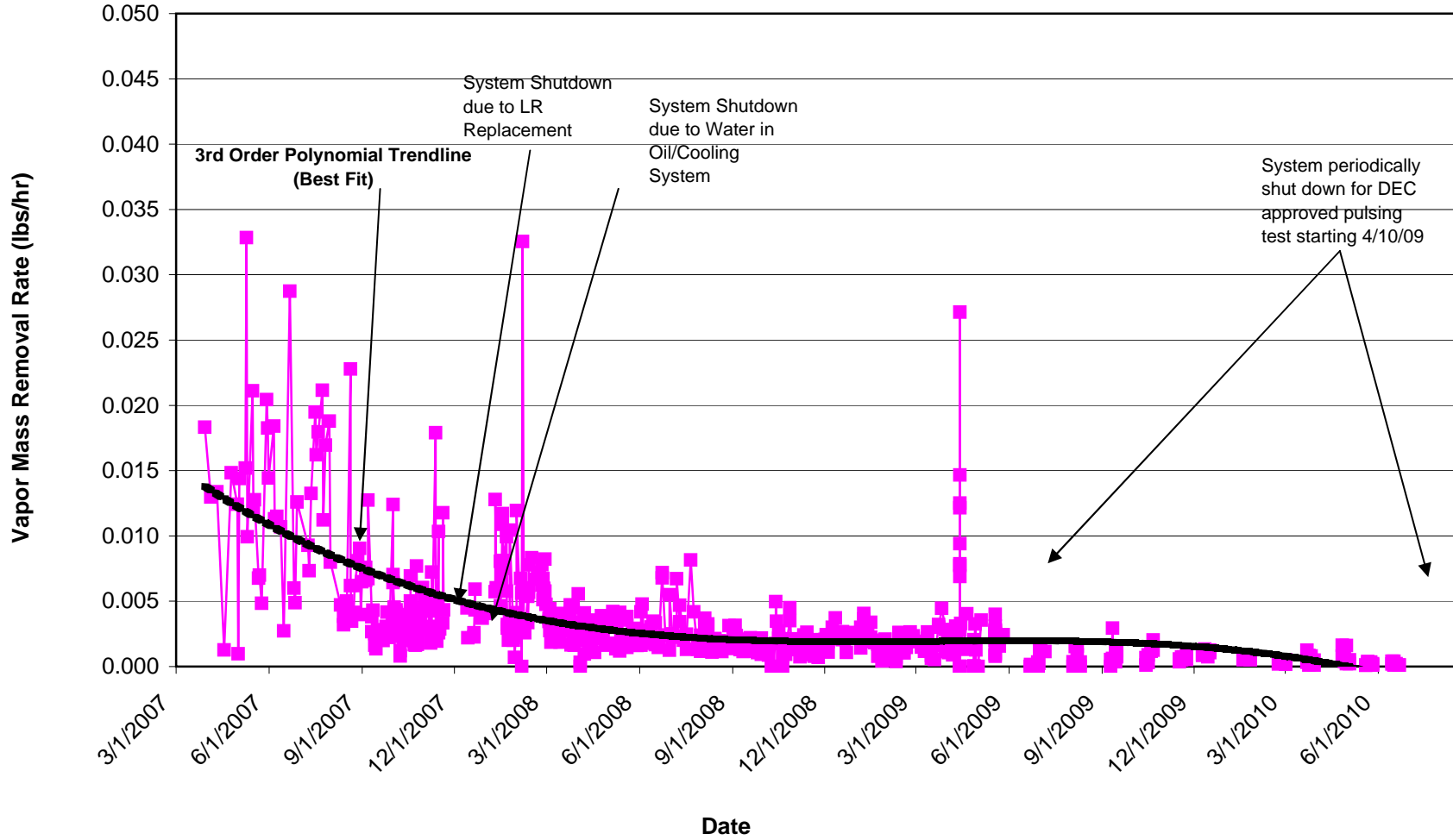


Figure 3A

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
June 2010

Vapor Mass Removal Rate Since April 2009

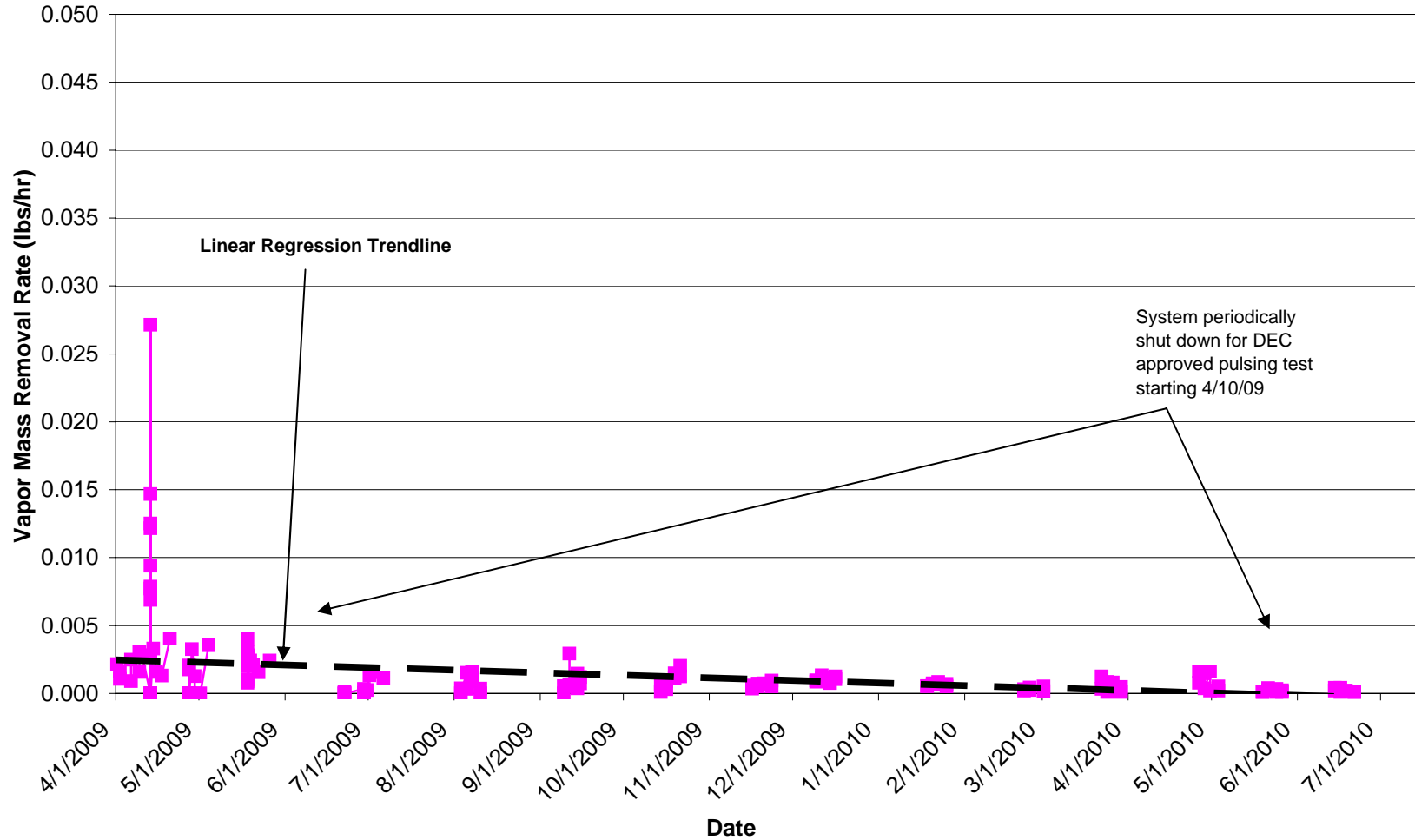
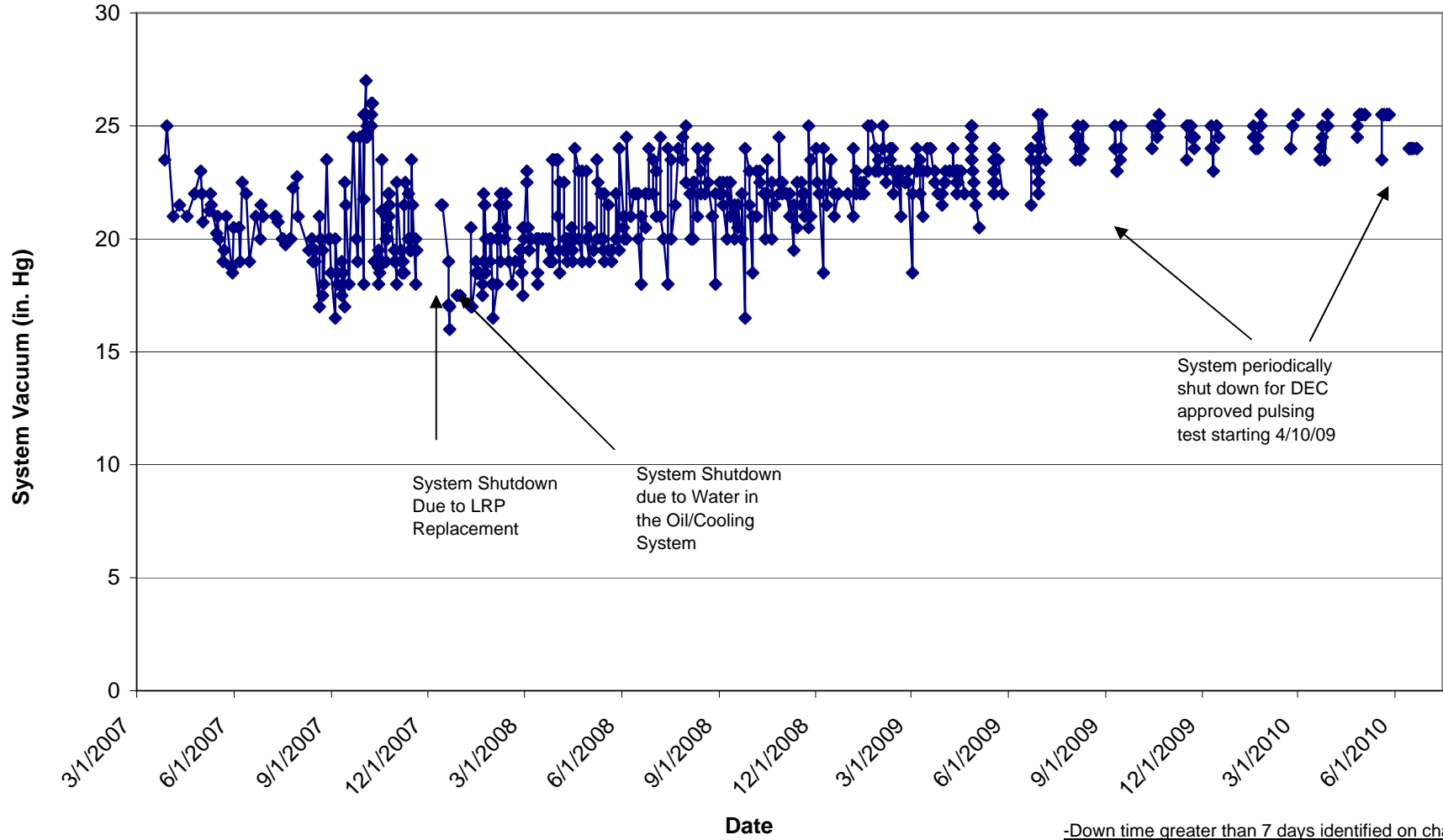


Figure 4

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
June 2010

System Vacuum

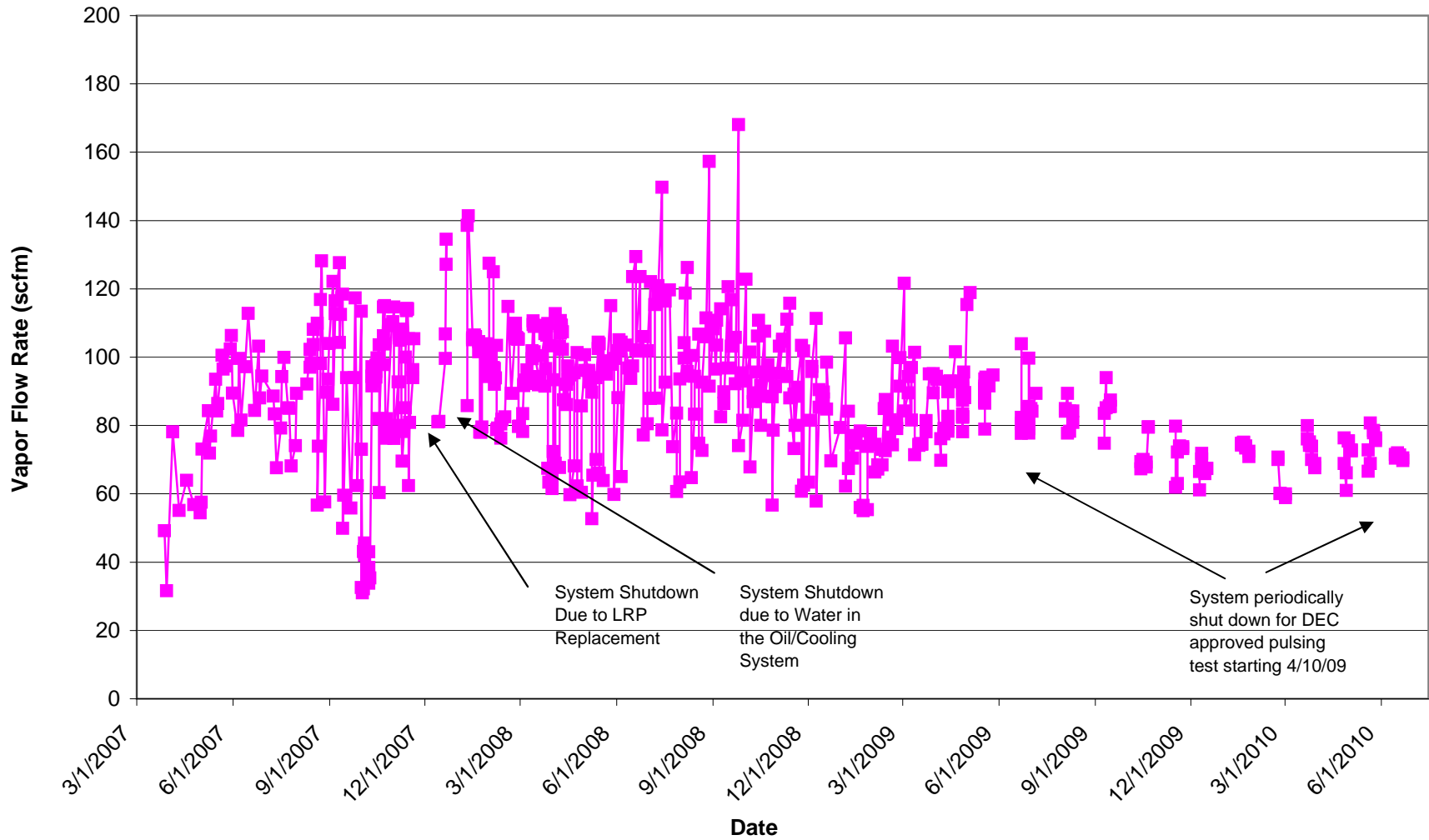


-Down time greater than 7 days identified on chart

Figure 5

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
June 2010

System Vapor Flow Rate



-Down time greater than 7 days identified on chart

Figure 6

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
June 2010

Total MeCl Mass Removed (Ground Water)

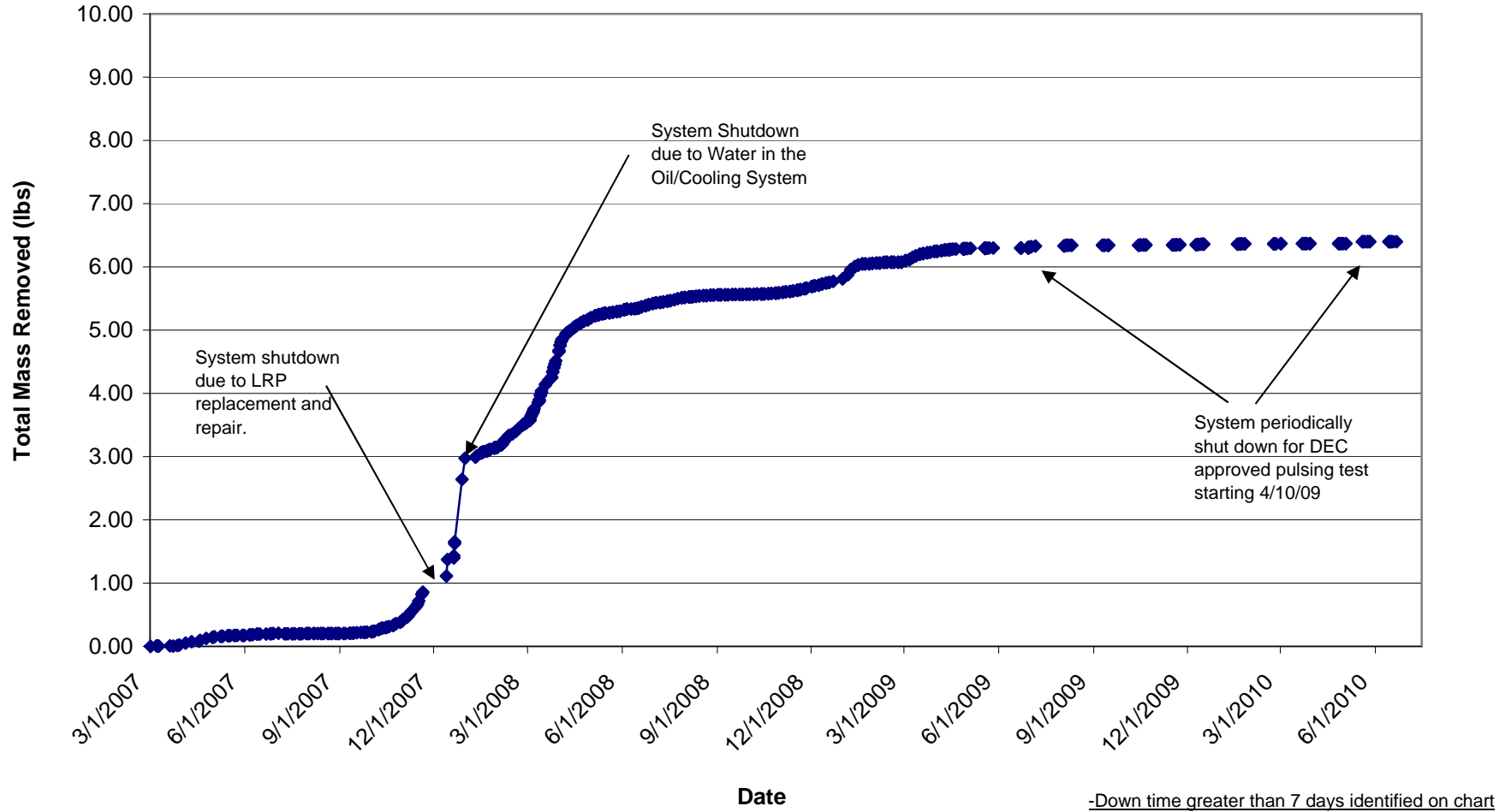


Figure 7

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
June 2010

MeCl Mass Removal Rate (Ground Water)

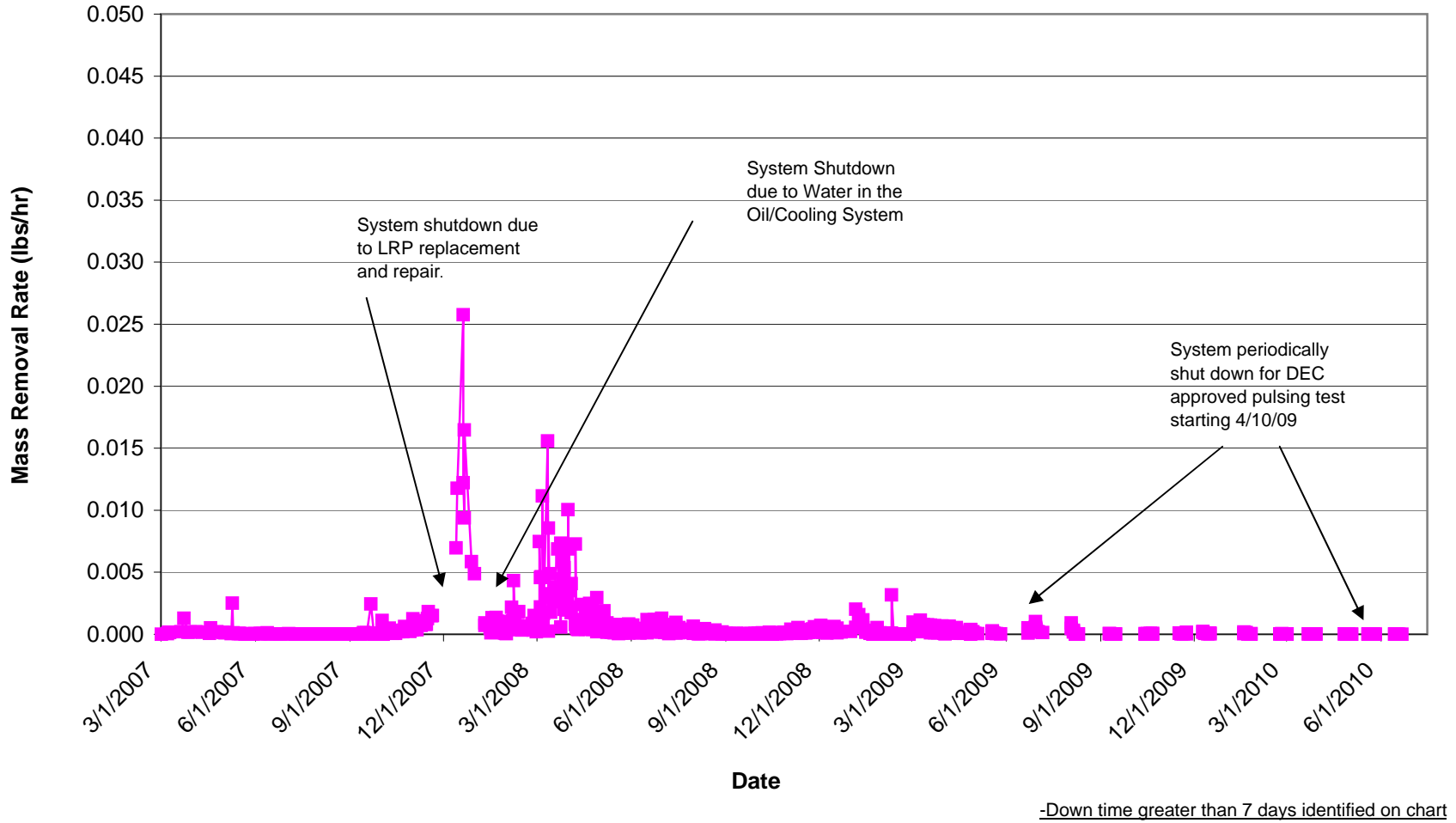
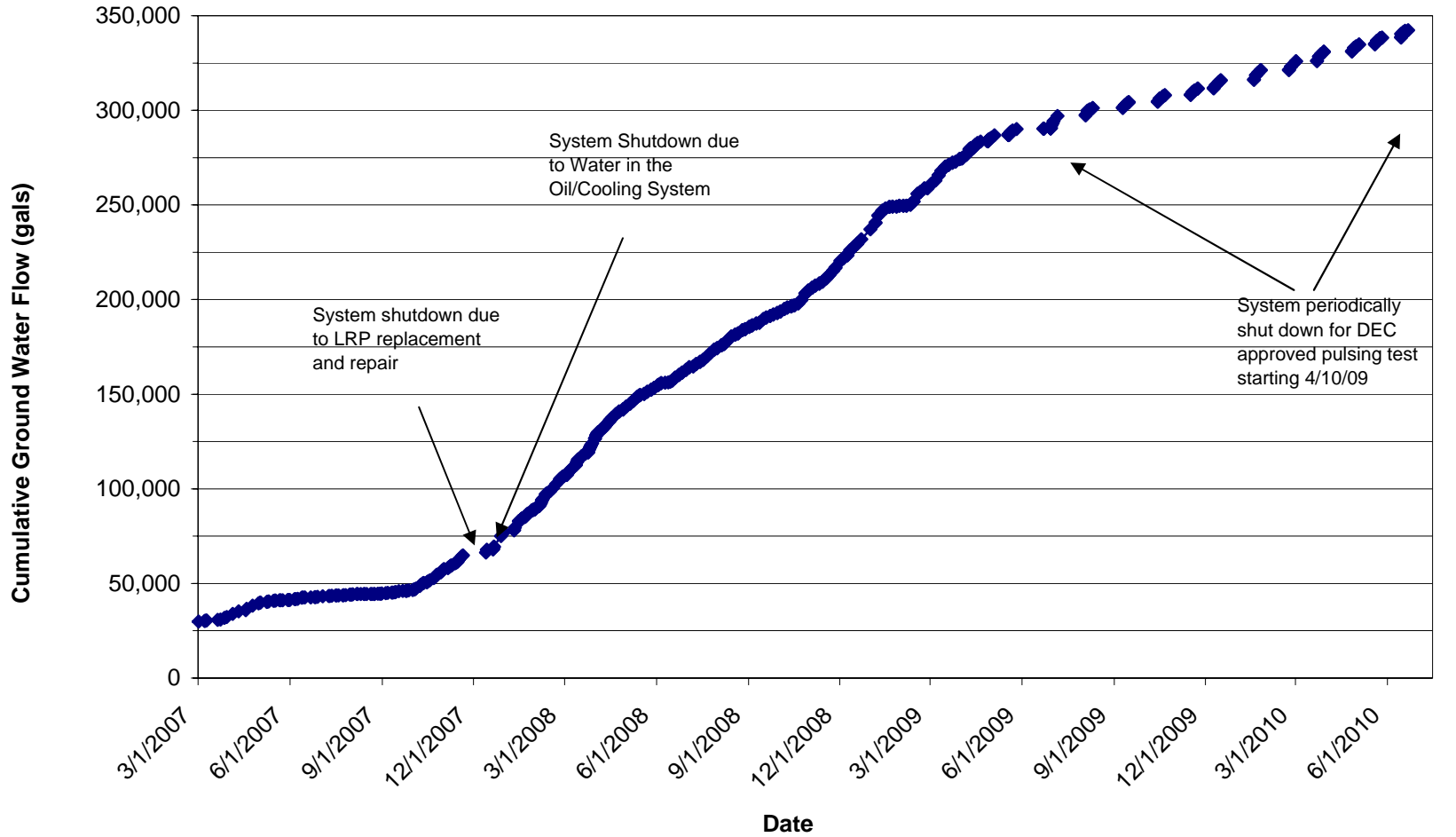


Figure 8

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
June 2010

Cumulative Ground Water Flow

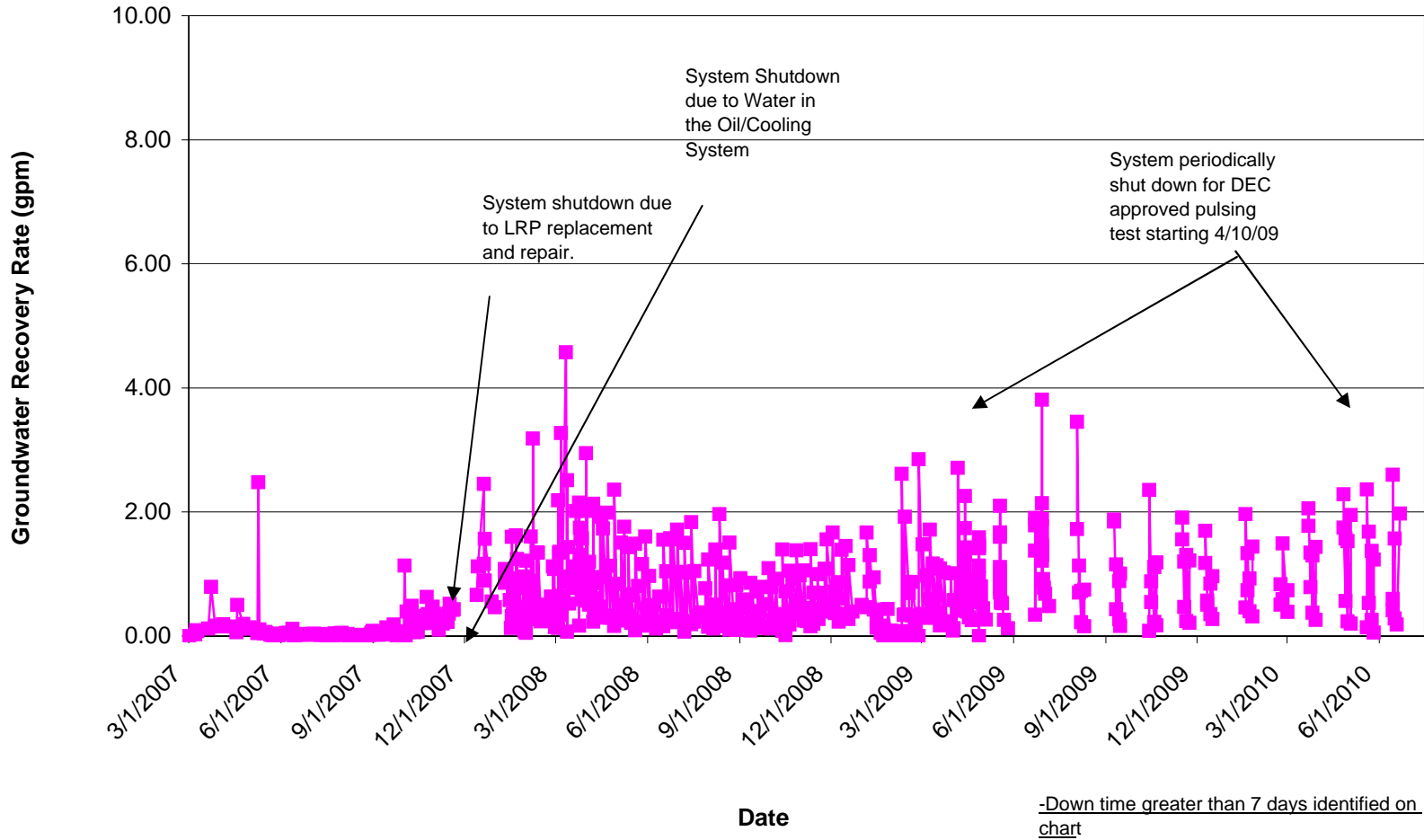


-Down time greater than 7 days identified on chart

Figure 9

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
June 2010

Ground Water Recovery Rate



Volatile Analysis Report for Water

Client: Quantum Management Group

Client Job Site: MPRS @ UCB
Jefferson Rd.
Client Job Number: N/A
Field Location: PreBT / Inf. 1,2,3 Comp.
Field ID Number: N/A
Sample Type: Water

Lab Project Number: 10-2403
Lab Sample Number: 8086
Date Sampled: 06/14/2010
Date Received: 06/14/2010
Date Analyzed: 06/18/2010

Liquid Influent

Compounds	Results in ug / L
Acetone	ND< 10.0
Amyl Acetate	ND< 25.0
Benzene	ND< 0.700
2-Butanone	ND< 10.0
Carbon disulfide	ND< 5.00
Chloroform	ND< 2.00
Chloromethane	ND< 2.00
cis-1,2-Dichloroethene	ND< 2.00
Ethyl acetate	ND< 25.0
Isopropyl acetate	ND< 25.0
Methylene chloride	ND< 5.00
m,p-Xylene	ND< 2.00
o-Xylene	ND< 2.00

ELAP Number 10958

Method: EPA 624

Data File: V76056.D

Comments: ND denotes Non Detect
ug / L = microgram per Liter

Signature: _____

Bruce Hoogesteger: Technical Director

Volatile Analysis Report for Water

Client: Quantum Management Group

Client Job Site: MPRS @ UCB
Jefferson Rd.
Client Job Number: N/A
Field Location: SP-302 / Eff. 1,2,3 Comp.
Field ID Number: N/A
Sample Type: Water

Lab Project Number: 10-2403
Lab Sample Number: 8087
Date Sampled: 06/14/2010
Date Received: 06/14/2010
Date Analyzed: 06/18/2010

Liquid Effluent

Compounds	Results in ug / L
Acetone	ND< 10.0
Amyl Acetate	ND< 25.0
Benzene	ND< 0.700
2-Butanone	ND< 10.0
Carbon disulfide	ND< 5.00
Chloroform	ND< 2.00
Chloromethane	ND< 2.00
cis-1,2-Dichloroethene	ND< 2.00
Ethyl acetate	ND< 25.0
Isopropyl acetate	ND< 25.0
Methylene chloride	ND< 5.00
m,p-Xylene	ND< 2.00
o-Xylene	ND< 2.00

ELAP Number 10958

Method: EPA 624

Data File: V76057.D

Comments: ND denotes Non Detect
ug / L = microgram per Liter

Signature: _____

Bruce Hoogesteger, Technical Director

Volatile Analysis Report for Air

Client: Quantum Management Group

Client Job Site: MPRS @ UCB Jefferson Rd	Lab Project Number: 10-2403	Lab Sample Number: 8088
Client Job Number: N/A	Date Sampled: 06/14/2010	Date Received: 06/14/2010
Field Location: SP-102 Tedlar Bag	Date Analyzed: 06/21/2010	
Field ID Number: N/A		
Sample Type: Air		

Vapor Influent

Compound	Results in PPBv	Results in ug / m3
Acetone	ND< 4,220	ND< 10,000
Benzene	ND< 627	ND< 2,000
2-Butanone	ND< 3,400	ND< 10,000
Carbon disulfide	ND< 643	ND< 2,000
Chloroform	ND< 414	ND< 2,000
Chloromethane	ND< 978	ND< 2,000
cis-1,2-Dichloroethene	ND< 509	ND< 2,000
Methylene chloride	ND< 1,460	ND< 5,000
m,p-Xylene	ND< 461	ND< 2,000
o-Xylene	ND< 461	ND< 2,000

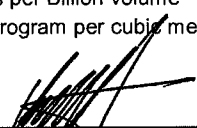
ELAP Number 10958

 Method: EPA 8260B
 Modified for Tedlar Bag

Data File: V76085.D

Comments: ND denotes Non Detect
 PPBv = Parts per Billion volume
 ug / m3 - Microgram per cubic meter.

Signature:



 Bruce Hoogesteger: Technical Director

Appendix B

Historical Quarterly Environmental Effectiveness Monitoring Reports (QEEMR) 2009-2011



November 9, 2011

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: Second Quarter 2011 Environmental Effectiveness and Fourth Round Post-Closure Monitoring Report
UCB Manufacturing Inc.
755 Jefferson Road Facility – Henrietta, New York
NYSDEC VCP Number: V00126-8

Dear Mr. MacLean:

On behalf of UCB Manufacturing Inc. (UCB), please find enclosed the Quarterly Environmental Effectiveness Monitoring Report for the above-referenced Site for the time period from April 1, 2011 through July 30, 2011. Please note that the monitoring period extends beyond the calendar quarter to accommodate laboratory services for specialized parameters. This report is being submitted in accordance with the requirements described in Section 6.2 of the draft Operation, Maintenance & Monitoring (OM&M) Plan.

On July 8, 11, 12 and 13, 2011, Kleinfelder East, Inc. (Kleinfelder) completed quarterly water level gauging and groundwater sampling at the Site pursuant to Section 4.3 of the draft OM&M Plan and the addendum to the OM&M Plan submitted in August 2007.

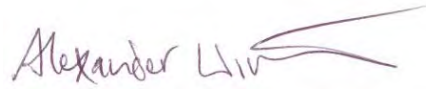
Groundwater quality analytical results are summarized on Table 1. As agreed to by NYSDEC at our meeting on November 18, 2010, this quarterly monitoring serves as the fourth round of post-closure monitoring and included monitored natural attenuation parameter field collection and lab analysis.

If you require additional information or clarification, please contact the undersigned at (845) 567-6530 or Rick Bethel of Quantum Management Group, Inc. at (513) 314-7543.

Sincerely,
Kleinfelder East, Inc.



Rose M. Weissman
Senior Project Manager



Alexander Wirth
Senior Project Geologist

Enclosure

Copy: Rick Bethel – Quantum Management Group, Inc.
John Lang – Quantum Management Group, Inc.
Michael Bogdan – Sanofi Aventis
Richard Ricci – Lowenstein Sandler PC
Jean McCreary – Nixon Peabody
Libby Ford – Nixon Peabody
Brian Chappell-UCB
File

**755 Jefferson Road Site, Henrietta, NY
QUARTERLY ENVIRONMENTAL EFFECTIVENESS MONITORING REPORT**

Site Address: Jefferson Road Facility 755 Jefferson Road Henrietta, New York	Regulatory Agency: NYSDEC – Region 8 Regulatory Contact: Gregory B. MacLean, P.E.
NYSDEC VCP No.: V00126-8	Consultant: Quantum Management Inc. (QMG), Kleinfelder East, Inc.
UCB Contact: Brian Chappell	Project Manager / Senior Project Geologist: Rick Bethel (QMG), Alexander Wirth (KLF)

Report Date: November 3, 2011

Current Site Status: Active pharmaceutical manufacturing facility.

Monitoring Period: April 1 through July 30

Work Performed: Quarterly environmental effectiveness monitoring pursuant to Section 4.3 of the draft Operation, Maintenance & Monitoring (OM&M) plan submitted to New York State Department of Environmental Conservation (NYSDEC) in May 2007 and the addendum to the OM&M Plan submitted in August 2007. As agreed to by NYSDEC at our meeting on November 18, 2010, this quarterly monitoring serves as the fourth round of post-closure monitoring. The post-closure monitoring plan is included in Section 3 of the Site Management Plan which was approved by NYSDEC on August 26, 2011.

Gauged 17 monitoring wells and collected groundwater samples from 17 monitoring wells between July 8 and 13, 2011. This round of sampling included the collection and analyses of samples for monitored natural attenuation (MNA) parameters. MNA results will be tabulated and discussed when the final round of post-closure monitoring is completed and a modeling program has been selected and the results evaluated for the Methylene Chloride Area.

Groundwater Monitoring:

Number of Wells:	17
Gauging Frequency:	Quarterly
Sampling Frequency:	Quarterly
Overburden Groundwater Depth:	1.76 feet to 40.19 feet

Shallow Groundwater Flow:	Southeast
Intermediate Groundwater Flow:	Northeast
Deep Groundwater Flow:	Southeast

Shallow Groundwater Gradient:	0.006	feet per foot
Intermediate Groundwater Gradient:	0.020	feet per foot
Deep Groundwater Gradient:	0.028	feet per foot

Site Geology:

The top of bedrock is located approximately 55 feet below grade throughout the Site. Surficial deposits at the Site generally consist of reddish-brown silt and clay with lesser amounts of brown fine/coarse grained sand and gray rounded gravel. Coarser material (particularly sand) is more abundant at depths of 0 to 6 feet below grade compared to deeper intervals. The relative permeability of the unconsolidated deposits above bedrock at the Site is considered low.

MPRS Effectiveness:

Approval was granted by the NYSDEC (via email correspondence dated July 29, 2010) to terminate system operation following the July 2010 operational period. This system operation has been terminated in accordance with this approval, although the remedial system remains in place.

The dissolved phase concentrations have been reduced across the Site based on laboratory analysis of groundwater samples from 17 monitoring wells, 15 of which are depicted on Figures 7 through 21. Wells RW-3 and MW-D9 are not depicted on a figure but have always been below detection limits.

The total volatile organic compound (VOC) vapor mass recovery rate steadily decreased since system start up to a steady state indicative of an asymptotic condition that was reached during the last quarter of 2008. During the investigation phase, the quantity of subsurface methylene chloride was estimated to be 171 pounds. (See, however, the related discussion in Section 3.1 of the pending *Methylene Chloride Area Operation Maintenance and Monitoring Final Engineering Report and Petition for Remedial Closeout* - Quantum Management Group, Inc., April

2010). As of August 2, 2010 when the system was shut down, an estimated total of 138.9 pounds of methylene chloride has been recovered since system startup.

Comments:

The seventeen monitoring wells were sampled in accordance with the ground water sampling procedures outlined in Section 4.3 of the Draft OM&M Plan and the addendum to the Draft OM&M Plan submitted in August 2007. Wells were sampled in order of the lowest historical methylene chloride concentration to the highest historical methylene chloride concentration. The pumps used to collect the samples were decontaminated between wells in accordance with the addendum to Section 1.5 of the Site Specific Health and Safety Plan presented as Attachment A to the OM&M Plan contained within the Draft Final Engineering Report.

As specified in §3.2 of the approved SMP, "Eight quarters of groundwater data will be used to verify that the concentrations are stable or declining and that impacted groundwater within the MCA has not migrated beyond the property boundary at levels above the groundwater standard." This assessment will be made based on the sentinel well(s) as well as the other wells included in the post-closure monitoring program. This sampling constituted the fourth round of post closure monitoring, although the sentinel wells were not installed until after the first quarterly post closure samples were collected.

As shown on Table 1 and Figures 7 through 21, groundwater levels of site-related VOCs remain stable or declining at all the wells, including the three sentinel wells. All three sentinel wells continued to have non-detectable levels of site-related VOCs, as they have had for all three quarters of their existence. While acetone was detected in MW-23I, it was at a concentration consistent with typical laboratory method reporting limits (<25 ug/L) and less than the NYSDEC standard of 50 µg/L. Therefore, it is not considered a Site-related VOC at the laboratory reported level. Acetone concentrations in groundwater collected from the remaining post closure monitoring wells were below detection levels.

Monitoring well MW-D10 had a methylene chloride concentration of 5.9 µg/L, consistent with the March 2011 result of below the laboratory method reporting limit, and below the most recent detection at 67 ug/L in January 2011. Monitoring well MW-D12 had a methylene chloride concentration of 2.1 µg/L, consistent with previous concentrations reported last quarter. Methylene chloride concentrations in groundwater collected from the other fifteen site-related monitoring wells were below laboratory method reporting limits.

The only well that had a reported Methylene Chloride concentration above the established 5.0 ug/L NYSDEC standard was MW-D10 which had a methylene chloride concentration of 5.9 µg/L. According to the approved SMP, "The [post closure monitoring] results will be used to determine if any statistically significant increases in concentration are occurring in any particular well, or if there is an indication that the residual VOCs are migrating beyond the MCA. Increases will be considered statistically significant if results that exceed the 95% upper confidence interval in comparison to the most recent eight quarters of post-closure data for a particular well are observed for two consecutive monitoring events." None of the wells on site have exceeded the 95% confidence interval for the past two consecutive monitoring events. It is important to note that for the purposes of calculating the 95% confidence interval all estimated values below the laboratory method reporting limit are adjusted to the laboratory method reporting limit.


Based on the above analyses, the 4th quarter post closure monitoring results continue to indicate that the groundwater concentrations of the site-related VOCs are stable or declining and are generally at or below the VCA established clean-up numbers, which are the applicable State Groundwater Standards. Further, the results from the sentinel wells indicated that that impacted groundwater within the MCA has not migrated beyond the property boundary at levels above the applicable groundwater standards.

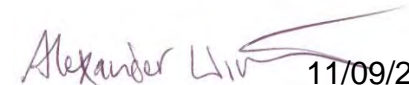
Due to a lab error, the sample collected at RW-5 23' interval was not run for the correct analysis and is therefore missing some compounds. All compounds that were reported for RW-5 at the 23' interval were below the laboratory method reporting limit. The sample collected at RW-5 32' was below the laboratory method reporting limit for all compounds.

Attachments:

Table: Table 1 – Monitoring Well Gauging and Groundwater Analytical Data

Figures: Figure 1 – Area Map
Figure 2 – Site Plan
Figure 3 – Groundwater Contour and Concentration Map – Shallow Wells
Figure 4 – Groundwater Contour and Concentration Map – Intermediate Wells
Figure 5 – Groundwater Contour and Concentration Map – Deep Wells
Figure 6 – Diagonal Well Potentiometric Conversion
Figures 7-21 – Dissolved Phase Concentration Trend Graphs (Concentrations less than the laboratory reporting levels are depicted as “0” µg/L.)


11/09/2011
Rose M. Weissman Date
Senior Project Manager


11/09/2011
Alexander Wirth Date
Senior Project Geologist

TABLE

**Table 1
MONITORING WELL GAUGING AND GROUNDWATER ANALYTICAL DATA**

UCB Facility
755 Jefferson Road
Rochester, New York
June 18, 2007 through September 28 29, 2010

Sample ID	Date	TOC Elevation	Depth to Water	Corrected Water Table Elevation	Acetone	Methyl Ethyl Ketone	Dichloro-difluoromethane	cis-1,2-Dichloroethene	Ethyl acetate	Isopropyl acetate	n-Amyl Acetate	Total Xylenes	Benzene	Chloroform	Chloromethane	1,1-Dichloroethylene	trans-1,2-Dichloroethene	Carbon Disulfide	Methylene chloride	
NYSDEC Standards					50	50	5	5	~	~	~	5	1	7	5	5	5	50	5	
MW-11 (Gauge only)	10/14/1996	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	31	
	11/15/1996	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL	
	2/1/1999	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL	
	4/29/1999	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL	
	7/30/1999	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL	
	10/18/1999	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL	
	1/28/2000	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL	
	8/21/2003	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL	
	6/18/2007	545.81	7.88	537.93	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	9/19/2007	545.81	6.95	538.86	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	12/17/2007	545.81	4.57	541.24	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	3/14/2008	545.81	6.27	539.54	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	6/3/2008	545.81	6.38	539.43	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	9/9/2008	545.81	6.49	539.32	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	12/17/2008	545.81	5.35	540.46	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	3/23/2009	545.81	6.07	539.74	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	6/17/2009	545.81	3.54	542.27	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	9/15/2009	545.81	6.20	539.61	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
12/16/2009	545.81	6.06	539.75	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	
3/10/2010	545.81	2.47	543.34	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	
6/1/2010	545.81	3.10	542.71	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	
9/28/2010	545.81	NG	NG	Abandoned September 2010																
MW-12 (Gauge & sample)	10/14/1996	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	2,800	
	11/15/1996	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	1.3	BRL	NA	BRL	NA	710	
	4/10/2002	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL	
	8/22/2003	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL	
	9/13/2005	NG	NG	NG	2 J	NA	NA	NA	NA	NA	NA	NA	BRL	BRL	NA	NA	NA	NA	NA	BRL
	2/21/2007	NG	NG	NG	BRL	BRL	NA	BRL	BRL	BRL	BRL	NA	BRL	BRL	BRL	BRL	NA	NA	NA	BRL
	6/19/2007	544.50	3.37	541.13	<25	<25	<5.0	<5.0	<5.0	<5.0	NA	<15	<5.0	<5.0	<5.0	<5.0	<5.0	NA	<5.0	
	9/19/2007	544.50	4.16	540.34	<25	<25	NA	<5.0	<5.0	<5.0	NA	<15	<5.0	<5.0	<5.0	NA	NA	NA	<5.0	
	12/18/2007	544.50	1.50	543.00	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<15	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	
	3/17/2008	544.50	1.61	542.89	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<15	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	
	6/3/2008	544.50	3.30	541.20	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<15	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	
	9/9/2008	544.50	3.68	540.82	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<15	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	
	12/17/2008	544.50	1.91	542.59	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	
	3/23/2009	544.50	2.48	542.02	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	
	6/17/2009	544.50	1.39	543.11	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	
	9/16/2009	544.50	2.55	541.95	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	
	12/16/2009	544.50	1.61	542.89	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	
	3/10/2010	544.50	1.45	543.05	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	
6/1/2010	544.50	1.74	542.76	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS		
9/28/2010	544.50	1.57	542.93	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0		
1/4/2011	544.50	1.56	542.94	<25	<25	<5.0	<5.0	<5.0	<5.0	NA	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0		
3/3/2011*	544.50	1.27	543.23	5.0 U	5.0 U	1.0 U	1.0 U	2.0 U	2.0 U	2.0 U	2.0 U	2.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	10 U	1.0 U	
7/11/2011	544.50	1.76	542.74	5.0 U	5.0 U	1.0 U	1.0 U	2.0 U	2.0 U	2.0 U	2.0 U	2.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	10 U	1.0 U	

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NYSDEC Standards					50	50	5	5	~	~	~	5	1	7	5	5	5	50	5	
MW-14 (Gauge only)	5/12/1998	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL	
	2/1/1999	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL	
	4/29/1999	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL	
	7/30/1999	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL	
	10/18/1999	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL	
	1/28/2000	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL	
	8/22/2003	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL	
	6/18/2007	544.27	4.35	539.92	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	9/19/2007	544.27	4.77	539.50	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	12/17/2007	544.27	4.03	540.24	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	3/14/2008	544.27	5.01	539.26	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	6/3/2008	544.27	4.85	539.42	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	9/9/2008	544.27	4.50	539.77	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	12/17/2008	544.27	4.30	539.97	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	3/23/2009	544.27	4.24	540.03	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	6/17/2009	544.27	1.45	542.82	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	9/15/2009	544.27	4.03	540.24	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
12/16/2009	544.27	4.10	540.17	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	
3/10/2010	544.27	3.94	540.33	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	
6/1/2010	544.27	3.97	540.30	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	
9/28/2010	544.27	NG	NG	Abandoned September 2010																
MW-15 (Gauge only)	5/12/1998	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	10	BRL	BRL	BRL	NA	BRL	NA	BRL	
	2/1/1999	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL	
	4/29/1999	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL	
	7/30/1999	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL	
	10/18/1999	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL	
	1/28/2000	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL	
	8/20/2003	NG	NG	NG	BRL	9.4	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL	
	6/18/2007	544.42	2.76	541.66	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	9/19/2007	544.42	3.32	541.10	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	12/17/2007	544.42	1.83	542.59	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	3/14/2008	544.42	4.38	540.04	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	6/3/2008	544.42	3.75	540.67	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	9/9/2008	544.42	2.39	542.03	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	12/17/2008	544.42	2.35	542.07	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	3/23/2009	544.42	2.14	542.28	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	6/17/2009	544.42	1.77	542.65	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	9/15/2009	544.42	2.36	542.06	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
12/16/2009	544.42	1.73	542.69	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	
3/10/2010	544.42	1.52	542.90	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	
6/1/2010	544.42	1.57	542.85	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	
9/28/2010	544.42	NG	NG	Abandoned September 2010																

**Table 1
MONITORING WELL GAUGING AND GROUNDWATER ANALYTICAL DATA**

UCB Facility
755 Jefferson Road
Rochester, New York
June 18, 2007 through September 28 29, 2010

Sample ID	Date	TOC Elevation	Depth to Water	Corrected Water Table Elevation	Acetone	Methyl Ethyl Ketone	Dichloro-difluoromethane	cis-1,2-Dichloroethene	Ethyl acetate	Isopropyl acetate	n-Amyl Acetate	Total Xylenes	Benzene	Chloroform	Chloromethane	1,1-Dichloroethylene	trans-1,2-Dichloroethene	Carbon Disulfide	Methylene chloride
NYSDEC Standards					50	50	5	5	~	~	~	5	1	7	5	5	5	50	5
MW-16 (Gauge & sample)	3/6/2002	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	2.2 J
	8/27/2003	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL
	9/15/2005	NG	NG	NG	BRL	NA	NA	NA	NA	NA	NA	NA	BRL	NA	NA	NA	NA	NA	0.6 J
	2/23/2007	NG	NG	NG	BRL	BRL	NA	BRL	BRL	BRL	NA	BRL	BRL	BRL	BRL	NA	NA	NA	BRL
	6/19/2007	548.41	6.83	541.58	<25	<25	<5.0	<5.0	<5.0	<5.0	NA	<15	<5.0	<5.0	<5.0	<5.0	<5.0	NA	<5.0
	9/20/2007	548.41	7.54	540.87	<25	<25	NA	<5.0	<5.0	<5.0	NA	<15	<5.0	<5.0	<5.0	<5.0	NA	NA	<5.0
	12/19/2007	548.41	5.75	542.66	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<15	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
	3/17/2008	548.41	6.01	542.40	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<15	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
	6/3/2008	548.41	7.00	541.41	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<15	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
	9/9/2008	548.41	7.26	541.15	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<15	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
	12/17/2008	548.41	6.69	541.72	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	3/23/2009	548.41	6.64	541.77	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	6/17/2009	548.41	5.09	543.32	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	9/16/2009	548.41	6.64	541.77	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	0.99 J
	12/16/2009	548.41	6.21	542.20	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	3/10/2010	548.41	5.68	542.73	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	6/1/2010	548.41	6.08	542.33	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
9/28/2010	548.41	5.85	542.56	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	
1/4/2011	548.41	5.70	542.71	<25	<25	<5.0	<5.0	<5.0	<5.0	NA	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	1.3 J	
3/3/2011*	548.41	5.39	543.02	5.0 U	5.0 U	1.0 U	1.0 U	2.0 U	2.0 U	2.0 U	2.0 U	2.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	10 U	1.0 U
7/12/2011	548.41	5.85	542.56	5.0 U	5.0 U	1.0 U	1.0 U	2.0 U	2.0 U	2.0 U	2.0 U	2.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	10 U	1.0 U
MW-18 (Gauge & sample)	3/6/2002	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	9,100,000
	8/28/2003	NG	NG	NG	BRL	BRL	BRL	1.8	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	1.2
	9/14/2005	NG	NG	NG	BRL	NA	NA	NA	NA	NA	NA	NA	BRL	NA	NA	NA	NA	NA	0.5 J
	2/23/2007	NG	NG	NG	BRL	BRL	NA	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL
	6/18/2007	547.98	DRY	DRY	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NA	NS
	9/19/2007	547.98	DRY	DRY	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NA	NS
	12/19/2007	547.98	9.70	538.28	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<15	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
	3/14/2008	547.98	14.30	533.68	DRY	DRY	DRY	DRY	DRY	DRY	DRY	DRY	DRY	DRY	DRY	DRY	DRY	DRY	DRY
	6/3/2008	547.98	DRY	DRY	DRY	DRY	DRY	DRY	DRY	DRY	DRY	DRY	DRY	DRY	DRY	DRY	DRY	DRY	DRY
	9/9/2008	547.98	DRY	DRY	DRY	DRY	DRY	DRY	DRY	DRY	DRY	DRY	DRY	DRY	DRY	DRY	DRY	DRY	DRY
	12/17/2008	547.98	DRY	DRY	DRY	DRY	DRY	DRY	DRY	DRY	DRY	DRY	DRY	DRY	DRY	DRY	DRY	DRY	DRY
	3/23/2009	547.98	12.53	535.45	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.1	<5.0	<5.0	<5.0	<5.0	5.5 B
	6/17/2009	547.98	6.10	541.88	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.1	<5.0	<5.0	<5.0	<5.0	5.7 B
	9/16/2009	547.98	9.15	538.83	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
	12/17/2009	547.98	9.41	538.57	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
	3/10/2010	547.98	5.00	542.98	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
	6/1/2010	547.98	6.30	541.68	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
9/28/2010	547.98	5.22	542.76	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	1.1 J	
1/4/2011	547.98	4.85	543.13	<25	<25	<5.0	<5.0	<5.0	<5.0	NA	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	
3/3/2011*	547.98	4.48	543.50	5.0 U	5.0 U	1.0 U	1.0 U	2.0 U	2.0 U	2.0 U	2.0 U	2.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	10 U	1.0 U
7/12/2011	547.98	5.08	542.90	5.0 U	5.0 U	1.0 U	1.0 U	2.0 U	2.0 U	2.0 U	2.0 U	2.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	10 U	1.0 U

**Table 1
MONITORING WELL GAUGING AND GROUNDWATER ANALYTICAL DATA**

UCB Facility
755 Jefferson Road
Rochester, New York
June 18, 2007 through September 28 29, 2010

Sample ID	Date	TOC Elevation	Depth to Water	Corrected Water Table Elevation	Acetone	Methyl Ethyl Ketone	Dichloro-difluoromethane	cis-1,2-Dichloroethene	Ethyl acetate	Isopropyl acetate	n-Amyl Acetate	Total Xylenes	Benzene	Chloroform	Chloromethane	1,1-Dichloroethylene	trans-1,2-Dichloroethene	Carbon Disulfide	Methylene chloride
NYSDEC Standards					50	50	5	5	~	~	~	5	1	7	5	5	5	50	5
MW-19	8/21/2003	NG	NG	NG	2.3 J	1.6 J	BRL	3.1	NA	NA	NA	BRL	0.69 J	BRL	BRL	NA	0.85 J	NA	BRL
	9/14/2005	NG	NG	NG	BRL	NA	NA	NA	NA	NA	NA	NA	BRL	NA	NA	NA	NA	NA	BRL
MW-20A	8/13/2003	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	1,200,000
	9/20/2005	NG	NG	NG	38	NA	NA	NA	NA	NA	NA	NA	1 J	NA	NA	NA	NA	NA	150,000 D
MW-20B	8/13/2003	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	100,000
MW-21	8/12/2003	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	12
	9/8/2005	NG	NG	NG	BRL	NA	NA	NA	NA	NA	NA	NA	BRL	NA	NA	NA	NA	NA	BRL
MW-22	8/12/2003	NG	NG	NG	74	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	37
	9/15/2005	NG	NG	NG	BRL	NA	NA	NA	NA	NA	NA	NA	BRL	NA	NA	NA	NA	NA	BRL
MW-22E	9/4/2003	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	24
MW-23S	1/4/2011	547.77	5.18	542.59	15 J	<25	<5.0	<5.0	<5.0	<5.0	NA	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
	3/3/2011*	547.77	4.89	542.88	5.0 U	5.0 U	1.0 U	1.0 U	2.0 U	2.0 U	2.0 U	2.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	10 U	1.0 U
	7/12/2011	547.77	5.62	542.15	5.0 U	5.0 U	1.0 U	1.0 U	2.0 U	2.0 U	2.0 U	2.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	10 U	1.0 U
MW-23I	1/4/2011	547.76	8.14	539.62	26	<25	<5.0	<5.0	<5.0	<5.0	NA	<10	<5.0	<5.0	<5.0	<5.0	<5.0	1.1 J	<5.0
	3/7/2011*	547.76	7.07	540.69	28	5.0 U	1.0 U	1.0 U	2.0 U	2.0 U	2.0 U	2.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	10 U	1.0 U
	7/12/2011	547.76	9.65	538.11	5.6	5.0 U	1.0 U	1.0 U	2.0 U	2.0 U	2.0 U	2.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	10 U	1.0 U
MW-23D	1/4/2011	547.62	26.15	521.47	8.1 J	<25	<5.0	<5.0	<5.0	<5.0	NA	<10	<5.0	<5.0	<5.0	<5.0	<5.0	0.81 J	<5.0
	3/7/2011*	547.62	25.34	522.28	5.0 U	5.0 U	1.0 U	1.0 U	2.0 U	2.0 U	2.0 U	2.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	10 U	1.0 U
	7/12/2011	547.62	26.27	521.35	5.0 U	5.0 U	1.0 U	1.0 U	2.0 U	2.0 U	2.0 U	2.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	10 U	1.0 U
EXSB-1	8/14/2003	NG	NG	NG	BRL	BRL	BRL	1.9	NA	NA	NA	BRL	BRL	BRL	BRL	NA	1.3	NA	11
	9/23/2005	NG	NG	NG	15 BJ	NA	NA	NA	NA	NA	NA	NA	BRL	NA	NA	NA	NA	NA	590 D
EXSB-1E	9/5/2003	NG	NG	NG	BRL	BRL	BRL	1.9	NA	NA	NA	BRL	BRL	BRL	BRL	NA	1.4	NA	4.6
EXSB-2	8/13/2003	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	1,900
	9/14/2005	NG	NG	NG	BRL	NA	NA	NA	NA	NA	NA	NA	0.4 J	NA	NA	NA	NA	NA	BRL
EXSB-2E	9/5/2003	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	6,600
MW-D1 (Gauge only)	5/12/1998	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL
	2/1/1999	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL
	4/29/1999	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL
	7/30/1999	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL
	110/18/99	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL
	1/28/2000	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL
	8/18/2003	NG	NG	NG	BRL	14	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL
	6/18/2007	544.32	22.55	521.77	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	9/19/2007	544.32	25.08	519.24	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	12/17/2007	544.32	23.40	520.92	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	3/14/2008	544.32	21.91	522.41	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	6/3/2008	544.32	22.64	521.68	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	9/9/2008	544.32	24.20	520.12	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	12/17/2008	544.32	23.60	520.72	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	3/23/2009	544.32	21.90	522.42	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	6/17/2009	544.32	22.88	521.44	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	9/15/2009	544.32	23.48	520.84	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
12/16/2009	544.32	23.25	521.07	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	
3/10/2010	544.32	22.46	521.86	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	
6/1/2010	544.32	22.63	521.69	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	
9/28/2010	544.32	NG	NG																Abandoned September 2010

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UCB Facility
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Sample ID	Date	TOC Elevation	Depth to Water	Corrected Water Table Elevation	Acetone	Methyl Ethyl Ketone	Dichloro-difluoromethane	cis-1,2-Dichloroethene	Ethyl acetate	Isopropyl acetate	n-Amyl Acetate	Total Xylenes	Benzene	Chloroform	Chloromethane	1,1-Dichloroethylene	trans-1,2-Dichloroethene	Carbon Disulfide	Methylene chloride	
NYSDEC Standards					50	50	5	5	~	~	~	5	1	7	5	5	5	50	5	
MW-D2 (Gauge only)	5/12/1998	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL	
	2/1/1999	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL	
	4/29/1999	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL	
	7/30/1999	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL	
	10/18/1999	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL	
	1/28/2000	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL	
	8/19/2003	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL	
	6/18/2007	544.37	22.04	522.33	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	9/19/2007	544.37	24.42	519.95	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	12/17/2007	544.37	22.75	521.62	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	3/14/2008	544.37	21.23	523.14	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	6/3/2008	544.37	21.95	522.42	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	9/9/2008	544.37	25.53	518.84	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	12/17/2008	544.37	22.85	521.52	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	3/23/2009	544.37	21.19	523.18	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	6/17/2009	544.37	22.09	522.28	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	9/15/2009	544.37	22.76	521.61	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
12/16/2009	544.37	22.49	521.88	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	
3/10/2010	544.37	21.75	522.62	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	
6/1/2010	544.37	21.92	522.45	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	
9/28/2010	544.37	NG	NG																	
Abandoned September 2010																				
MW-D3 (Gauge only)	5/12/1998	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	110	
	2/1/1999	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL	
	4/29/1999	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL	
	7/30/1999	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL	
	10/18/1999	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL	
	1/28/2000	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL	
	8/20/2003	NG	NG	NG	BRL	38	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL	
	6/18/2007	545.78	23.34	522.44	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	
	9/19/2007	545.78	25.08	520.70	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	
	12/17/2007	545.78	24.31	521.47	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	
	3/14/2008	545.78	22.79	522.99	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	
	6/3/2008	545.78	23.43	522.35	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	
	9/9/2008	545.78	24.90	520.88	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	
	12/17/2008	545.78	24.30	521.48	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	
	3/23/2009	545.78	22.71	523.07	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	
	6/17/2009	545.78	23.67	522.11	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	
	9/15/2009	545.78	23.95	521.83	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	
12/16/2009	545.78	23.93	521.85	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS		
3/10/2010	545.78	26.33	519.45	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS		
6/1/2010	545.78	23.44	522.34	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS		
9/28/2010	545.78	NG	NG																	
Abandoned September 2010																				

**Table 1
MONITORING WELL GAUGING AND GROUNDWATER ANALYTICAL DATA**

UCB Facility
755 Jefferson Road
Rochester, New York
June 18, 2007 through September 28 29, 2010

Sample ID	Date	TOC Elevation	Depth to Water	Corrected Water Table Elevation	Acetone	Methyl Ethyl Ketone	Dichloro-difluoromethane	cis-1,2-Dichloroethene	Ethyl acetate	Isopropyl acetate	n-Amyl Acetate	Total Xylenes	Benzene	Chloroform	Chloromethane	1,1-Dichloroethylene	trans-1,2-Dichloroethene	Carbon Disulfide	Methylene chloride
NYSDEC Standards					50	50	5	5	~	~	~	5	1	7	5	5	5	50	5
MW-D4 (Gauge only)	7/30/1999	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL
	10/18/1999	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL
	1/28/2000	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL
	8/21/2003	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL
	6/18/2007	545.71	23.25	522.46	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NA	NS
	9/19/2007	545.71	25.76	519.95	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NA	NS
	12/17/2007	545.71	24.15	521.56	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NA	NS
	3/14/2008	545.71	22.31	523.40	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NA	NS
	6/3/2008	545.71	23.40	522.31	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NA	NS
	9/9/2008	545.71	24.93	520.78	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NA	NS
	12/17/2008	545.71	24.32	521.39	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	3/23/2009	545.71	22.63	523.08	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	6/17/2009	545.71	23.64	522.07	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	9/15/2009	545.71	41.39	504.32	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	12/16/2009	545.71	23.96	521.75	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
3/10/2010	545.71	23.20	522.51	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	
6/1/2010	545.71	23.54	522.17	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	
9/28/2010	545.71	NG	NG																
Abandoned September 2010																			
MW-D5 (Gauge only)	7/30/1999	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL
	10/18/1999	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL
	1/28/2000	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL
	8/19/2003	NG	NG	NG	BRL	28	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL
	6/18/2007	545.33	22.53	522.80	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NA	NS
	9/19/2007	545.33	24.90	520.43	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NA	NS
	12/17/2007	545.33	23.38	521.95	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NA	NS
	3/14/2008	545.33	22.21	523.12	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NA	NS
	6/3/2008	545.33	22.48	522.85	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NA	NS
	9/9/2008	545.33	23.60	521.73	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NA	NS
	12/17/2008	545.33	23.57	521.76	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	3/23/2009	545.33	22.25	523.08	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	6/17/2009	545.33	23.03	522.30	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	9/15/2009	545.33	23.33	522.00	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	12/16/2009	545.33	23.11	522.22	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
3/10/2010	545.33	22.40	522.93	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	
6/1/2010	545.33	22.49	522.84	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	
9/28/2010	545.33	NG	NG																
Abandoned September 2010																			

**Table 1
MONITORING WELL GAUGING AND GROUNDWATER ANALYTICAL DATA**

UCB Facility
755 Jefferson Road
Rochester, New York
June 18, 2007 through September 28 29, 2010

Sample ID	Date	TOC Elevation	Depth to Water	Corrected Water Table Elevation	Acetone	Methyl Ethyl Ketone	Dichloro-difluoromethane	cis-1,2-Dichloroethene	Ethyl acetate	Isopropyl acetate	n-Amyl Acetate	Total Xylenes	Benzene	Chloroform	Chloromethane	1,1-Dichloroethylene	trans-1,2-Dichloroethene	Carbon Disulfide	Methylene chloride
NYSDEC Standards					50	50	5	5	~	~	~	5	1	7	5	5	5	50	5
MW-D6 (Gauge & sample)	3/6/2002	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	1.4 J
	8/27/2003	NG	NG	NG	BRL	5.5	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	1.3
	9/20/2005	NG	NG	NG	4 J	NA	NA	NA	NA	NA	NA	NA	BRL	NA	NA	NA	NA	NA	2
	2/27/2007	NG	NG	NG	BRL	BRL	NA	BRL	BRL	BRL	NA	BRL	BRL	BRL	BRL	NA	NA	NA	BRL
	6/19/2007	548.37	26.31	522.06	<25	<25	<5.0	<5.0	<5.0	<5.0	NA	<15	<5.0	<5.0	<5.0	<5.0	<5.0	NA	<5.0
	9/20/2007	548.37	28.43	519.94	<25	<25	NA	<5.0	<5.0	<5.0	NA	<15	<5.0	<5.0	<5.0	<5.0	NA	NA	<5.0
	12/19/2007	548.37	27.17	521.20	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<15	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
	3/18/2008	548.37	25.69	522.68	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<15	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
	6/4/2008	548.37	26.45	521.92	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<15	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
	9/10/2008	548.37	28.01	520.36	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<15	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
	12/17/2008	548.37	27.41	520.96	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	3/23/2009	548.37	25.72	522.65	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	6/17/2009	548.37	26.69	521.68	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	9/18/2009	548.37	27.31	521.06	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	2.3 J
	12/16/2009	548.37	27.00	521.37	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	3/10/2010	548.37	26.35	522.02	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	6/1/2010	548.37	27.45	520.92	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	9/29/2010	548.37	27.93	520.44	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
1/4/2011	548.37	26.12	522.25	<25	<25	<5.0	<5.0	<5.0	<5.0	NA	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	>5.0	
3/8/2011*	548.37	25.86	522.51	5.0 U	5.0 U	1.0 U	1.0 U	2.0 U	2.0 U	2.0 U	2.0 U	2.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	10 U	1.2
7/13/2011	548.37	26.48	521.89	5.0 U	5.0 U	1.0 U	1.0 U	2.0 U	2.0 U	2.0 U	2.0 U	2.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	10 U	1.0U
MW-D7 (Gauge and sample)	3/6/2002	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	6.5
	4/10/2002	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	5.6
	8/28/2003	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	570
	9/19/2005	NG	NG	NG	BRL	NA	NA	NA	NA	NA	NA	NA	BRL	NA	NA	NA	NA	NA	2
	2/28/2007	NG	NG	NG	BRL	BRL	NA	BRL	BRL	BRL	NA	BRL	BRL	BRL	BRL	NA	NA	NA	13.4
	6/19/2007	548.27	26.11	522.16	<25	<25	<5.0	<5.0	<5.0	<5.0	NA	<15	<5.0	<5.0	<5.0	<5.0	<5.0	NA	7.4
	9/21/2007	548.27	28.62	519.65	<25	<25	NA	<5.0	<5.0	<5.0	NA	<15	<5.0	<5.0	<5.0	NA	NA	NA	<5.0
	12/19/2007	548.27	26.99	521.28	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<15	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	5.1
	3/18/2008	548.27	25.52	522.75	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<15	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
	6/5/2008	548.27	26.25	522.02	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<15	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
	9/10/2008	548.27	27.78	520.49	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<15	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
	12/17/2008	548.27	27.17	521.10	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<15	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	5.4
	3/23/2009	548.27	25.48	522.79	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	9.3 B
	6/17/2009	548.27	26.49	521.78	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	1.8 J,B
	9/18/2009	548.27	27.04	521.23	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
	12/17/2009	548.27	26.80	521.47	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	6.3
	3/11/2010	548.27	26.08	522.19	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	0.97 J
	6/1/2010	548.27	26.21	522.06	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
9/29/2010	548.27	27.70	520.57	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	
1/4/2011	548.27	25.89	522.38	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	2.4 J	
3/8/2011*	548.27	25.62	522.65	5.0 U	5.0 U	1.0 U	1.0 U	2.0 U	2.0 U	2.0 U	2.0 U	2.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	10 U	1.7
7/13/2011	548.27	26.24	522.03	5.0 U	5.0 U	1.0 U	1.0 U	2.0 U	2.0 U	2.0 U	2.0 U	2.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	10 U	1.0U

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Sample ID	Date	TOC Elevation	Depth to Water	Corrected Water Table Elevation	Acetone	Methyl Ethyl Ketone	Dichloro-difluoromethane	cis-1,2-Dichloroethene	Ethyl acetate	Isopropyl acetate	n-Amyl Acetate	Total Xylenes	Benzene	Chloroform	Chloromethane	1,1-Dichloroethylene	trans-1,2-Dichloroethene	Carbon Disulfide	Methylene chloride	
NYSDEC Standards					50	50	5	5	~	~	~	5	1	7	5	5	5	50	5	
MW-D8 (Recovery well, gauge & sample)	3/6/2002	NG	NG	NG	10 J	BRL	BRL	2.2 J	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	180	
	4/10/2002	NG	NG	NG	BRL	BRL	BRL	150	NA	NA	NA	BRL	BRL	260	870	NA	BRL	NA	6,600,000	
	8/28/2003	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	1,100	NA	BRL	NA	5,800,000	
	9/15/2005	NG	NG	NG	BRL	NA	NA	NA	NA	NA	NA	NA	6	NA	NA	NA	NA	NA	6,300,000 D	
	2/28/2007	NG	NG	NG	25,200	BRL	NA	BRL	BRL	BRL	NA	BRL	BRL	BRL	BRL	NA	NA	NA	289,000	
	6/20/2007	547.98	19.10	528.88	<25	<25	<5.0	<5.0	<5.0	<5.0	NA	<15	<5.0	<5.0	<100,000	<5.0	<5.0	NA	910,000 D	
	9/21/2007	547.98	22.17	525.81	<50,000	<50,000	NA	<10,000	<10,000	<10,000	NA	<30,000	<10,000	<10,000	<10,000	NA	NA	NA	120,000 D	
	12/19/2007	547.98	6.75	541.23	<12,000	<12,000	<2,500	<2,500	<2,500	<2,500	<2,500	<2,500	<7,500	<2,500	<2,500	<2,500	NA	<2,500	<2,500	40,000
	3/18/2008	547.98	17.21	530.77	<12,000	<12,000	<2,500	<2,500	<2,500	<2,500	<2,500	<2,500	<7,500	<2,500	<2,500	<2,500	<2,500	<2,500	<2,500	380,000
	6/5/2008	547.98	26.50	521.48	<50,000	<50,000	<10,000	<10,000	<10,000	<10,000	<10,000	<30,000	<10,000	<10,000	<10,000	<10,000	<10,000	<10,000	<10,000	150,000
	9/11/2008	547.98	16.60	531.38	<12,000	<12,000	<2,500	<2,500	<2,500	<2,500	<2,500	<7,500	<2,500	<2,500	<2,500	<2,500	<2,500	<2,500	<2,500	22,000
	12/17/2008	547.98	28.01	519.97	<50,000	<50,000	<10,000	<10,000	<10,000	<10,000	<10,000	<30,000	<10,000	<10,000	18,000	<10,000	<10,000	<10,000	<10,000	120,000
	3/23/2009	547.98	24.03	523.95	<25000	<25,000	<5,000	<5,000	<5,000	<5,000	<5,000	<10,000	<5,000	<5,000	<5,000	<5,000	<5,000	<5,000	<5,000	84,000 D
	6/17/2009	547.98	26.74	521.24	<12,000	<12,000	<2,500	<2,500	<2,500	<2,500	<2,500	<5,000	<2,500	<2,500	2,500	2,500	2,500	2,500	2,500	29,000 D,B
	9/18/2009	547.98	17.24	530.74	<6,200	<6,200	<1,200	<1,200	<1,200	<1,200	<1,200	<2,500	<1,200	<1,200	<1,200	<1,200	<1,200	<1,200	<1,200	21,000
	12/17/2009	547.98	27.47	520.51	<5,000	<5,000	<1,000	<1,000	<1,000	<1,000	<1,000	<2,000	<1,000	<1,000	<1,000	<1,000	<1,000	<1,000	<1,000	27,000
	3/11/2010	547.98	7.56	540.42	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	53
	6/1/2010	547.98	7.84	540.14	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	4.1 J
9/29/2010	547.98	8.24	539.74	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	
1/4/2011	547.98	5.25	542.73	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	19	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	67	
3/8/2011*	547.98	4.46	543.52	5.0 U	5.0 U	1.0 U	1.0 U	2.0 U	2.0 U	2.0 U	2.0 U	2.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	
7/13/2011	547.98	5.24	542.74	5.0 U	5.0 U	1.0 U	1.0 U	2.0 U	2.0 U	2.0 U	2.0 U	2.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	
MW-D9 (Gauge & sample)	8/25/2003	NG	NG	NG	BRL	2.3 J	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL	
	9/13/2005	NG	NG	NG	BRL	NA	NA	NA	NA	NA	NA	NA	BRL	NA	NA	NA	NA	NA	NA	BRL
	2/26/2007	NG	NG	NG	BRL	BRL	NA	BRL	BRL	BRL	NA	BRL	BRL	BRL	BRL	NA	NA	NA	NA	BRL
	6/20/2007	547.44	12.77	534.67	<25	<25	<5.0	<5.0	<5.0	<5.0	NA	<15	<5.0	<5.0	<5.0	<5.0	<5.0	NA	<5.0	
	9/19/2007	547.44	14.02	533.42	<25	<25	NA	<5.0	<5.0	<5.0	NA	<15	<5.0	<5.0	<5.0	NA	NA	NA	<5.0	
	12/18/2007	547.44	13.18	534.26	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<15	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	
	3/18/2008	547.44	27.51	519.93	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<15	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	
	6/4/2008	547.44	28.24	519.20	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<15	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	
	9/10/2008	547.44	29.90	517.54	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<15	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	
	12/17/2008	547.44	30.00	517.44	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	3/23/2009	547.44	27.46	519.98	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	6/17/2009	547.44	28.48	518.96	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	9/17/2009	547.44	29.08	518.36	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	
	12/16/2009	547.44	28.86	518.58	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	3/10/2010	547.44	28.03	519.41	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
6/1/2010	547.44	26.21	521.23	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	
9/29/2010	547.44	29.75	517.69	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0		
1/4/2011	547.44	27.88	522.50	<25	<25	<5.0	<5.0	<5.0	<5.0	NA	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0		
3/4/2011*	547.44	27.60	522.85	5.0 U	5.0 U	1.0 U	1.0 U	2.0 U	2.0 U	2.0 U	2.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	
7/12/2011	547.44	20.82	522.31	5.0 U	5.0 U	1.0 U	1.0 U	2.0 U	2.0 U	2.0 U	2.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	

**Table 1
MONITORING WELL GAUGING AND GROUNDWATER ANALYTICAL DATA**

UCB Facility
755 Jefferson Road
Rochester, New York
June 18, 2007 through September 28 29, 2010

Sample ID	Date	TOC Elevation	Depth to Water	Corrected Water Table Elevation	Acetone	Methyl Ethyl Ketone	Dichloro-difluoromethane	cis-1,2-Dichloroethene	Ethyl acetate	Isopropyl acetate	n-Amyl Acetate	Total Xylenes	Benzene	Chloroform	Chloromethane	1,1-Dichloroethylene	trans-1,2-Dichloroethene	Carbon Disulfide	Methylene chloride	
NYSDEC Standards					50	50	5	5	~	~	~	5	1	7	5	5	5	50	5	
MW-D13 (Gauge & sample)	8/20/2003	NG	NG	NG	BRL	5.4	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	7.8	
	9/8/2005	NG	NG	NG	BRL	NA	NA	NA	NA	NA	NA	NA	BRL	NA	NA	NA	NA	NA	14	
	2/26/2007	NG	NG	NG	BRL	BRL	NA	BRL	BRL	BRL	NA	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	
	6/18/2007	546.77	23.09	523.68	<25	<25	<5.0	<5.0	<5.0	<5.0	NA	<15	<5.0	<5.0	<5.0	<5.0	<5.0	NA	<5.0	
	9/20/2007	546.77	25.48	521.29	<25	<25	NA	<5.0	<5.0	<5.0	NA	<15	<5.0	<5.0	<5.0	NA	NA	NA	<5.0	
	12/18/2007	546.77	23.97	522.80	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<15	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
	3/17/2008	546.77	31.88	514.89	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<15	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
	6/4/2008	546.77	32.80	513.97	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<15	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
	9/10/2008	546.77	34.90	511.87	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<15	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
	12/17/2008	546.77	34.11	512.66	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<15	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
	3/23/2009	546.77	31.82	514.95	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
	6/17/2009	546.77	33.04	513.73	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	1.2 J,B
	9/17/2009	546.77	33.90	512.87	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
	12/17/2009	546.77	33.61	513.16	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
	3/11/2010	546.77	32.54	514.23	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
6/1/2010	546.77	32.74	514.03	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	
9/28/2010	546.77	34.95	511.82	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	
1/4/2011	546.77	32.37	523.88	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	NA	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	
3/7/2011*	546.77	32.02	524.13	5.0 U	5.0 U	1.0 U	1.0 U	2.0 U	2.0 U	2.0 U	2.0 U	2.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	10 U	1.0 U	
7/13/2011	546.77	32.81	523.57	5.0 U	5.0 U	1.0 U	1.0 U	2.0 U	2.0 U	2.0 U	2.0 U	2.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	10 U	1.0 U	
P-6S (Gauge only)	6/18/2007	545.45	4.63	540.82	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	9/19/2007	545.45	5.83	539.62	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	12/18/2007	545.45	3.45	542.00	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	3/14/2008	545.45	2.37	543.08	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	6/3/2008	545.45	4.05	541.40	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	9/9/2008	545.45	4.06	541.39	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	12/17/2008	545.45	3.53	541.92	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	3/23/2009	545.45	3.31	542.14	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	6/17/2009	545.45	2.14	543.31	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	9/15/2009	545.45	3.06	542.39	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	12/16/2009	545.45	2.47	542.98	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	3/10/2010	545.45	2.29	543.16	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
6/1/2010	545.45	2.75	542.70	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	
9/28/2010	545.45	NG	NG	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	

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UCB Facility
755 Jefferson Road
Rochester, New York
June 18, 2007 through September 28 29, 2010

Sample ID	Date	TOC Elevation	Depth to Water	Corrected Water Table Elevation	Acetone	Methyl Ethyl Ketone	Dichloro-difluoromethane	cis-1,2-Dichloroethene	Ethyl acetate	Isopropyl acetate	n-Amyl Acetate	Total Xylenes	Benzene	Chloroform	Chloromethane	1,1-Dichloroethylene	trans-1,2-Dichloroethene	Carbon Disulfide	Methylene chloride
NYSDEC Standards					50	50	5	5	~	~	~	5	1	7	5	5	5	50	5
RW-1	6/21/1996	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	6,200
	10/14/1996	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	3,100
	11/15/1996	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	1,591,400
	3/24/97 ^a	NG	NG	NG	BRL	BRL	NA	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	32,000
	3/25/97 ^a	NG	NG	NG	BRL	BRL	NA	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	6,100
	4/4/97 ^a	NG	NG	NG	BRL	BRL	NA	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	2,600
	5/12/1998	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	14
	2/1/1999	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL
	4/29/1999	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL
	7/30/1999	NG	NG	NG	BRL	BRL	1	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	210
	10/18/1999	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL
1/28/2003	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	2,000	
8/26/2003	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	0.74 J	BRL	BRL	BRL	NA	BRL	NA	BRL	
RW-2 (Recovery well, gauge & sample)	7/30/1999	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	20,700
	10/18/1999	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	620
	1/28/2000	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	1,900
	9/9/2005	NG	NG	NG	4 J	NA	NA	NA	NA	NA	NA	NA	0.7 J	NA	NA	NA	NA	NA	4,401 BD
	2/23/2007	NG	NG	NG	BRL	BRL	NA	BRL	BRL	BRL	NA	BRL	BRL	BRL	BRL	NA	NA	NA	19.4
	6/19/2007	547.64	6.54	541.10	<25	<25	<5.0	<5.0	<5.0	<5.0	NA	<15	<5.0	<5.0	<5.0	<5.0	<5.0	NA	34
	9/20/2007	547.64	7.73	539.91	<25	<25	NA	<5.0	<5.0	<5.0	NA	<15	<5.0	<5.0	<5.0	NA	NA	NA	<5.0
	12/18/2007	547.64	2.42	545.22	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<15	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
	3/17/2008	547.64	3.21	544.43	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<15	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
	6/3/2008	547.64	5.80	541.84	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<15	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
	9/9/2008	547.64	6.10	541.54	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<15	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
	12/17/2008	547.64	4.95	542.69	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<15	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
	3/23/2009	547.64	5.10	542.54	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
	6/17/2009	547.64	3.89	543.75	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	2.8 J,B
	9/16/2009	547.64	5.05	542.59	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
	12/17/2009	547.64	4.65	542.99	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
	3/10/2010	547.64	2.69	544.95	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
6/1/2010	547.64	4.50	543.14	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	
9/28/2010	547.64	NG	NG	Abandoned September 2010															
RW-3 (Gauge and Sample)	8/15/2003	NG	NG	NG	BRL	BRL	BRL	1.4	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL
	9/14/2005	NG	NG	NG	4 J	NA	NA	NA	NA	NA	NA	NA	BRL	BRL	NA	NA	NA	NA	BRL
	2/21/2007	NG	NG	NG	BRL	BRL	NA	BRL	BRL	BRL	NA	BRL	BRL	BRL	BRL	NA	NA	NA	BRL
	6/20/2007	549.24	9.17	540.07	<25	<25	<5.0	<5.0	<5.0	<5.0	NA	<15	<5.0	<5.0	<5.0	<5.0	<5.0	NA	<5.0
	9/19/2007	549.24	11.52	537.72	<25	<25	NA	<5.0	<5.0	<5.0	NA	<15	<5.0	<5.0	<5.0	NA	NA	NA	<5.0
	12/18/2007	549.24	3.83	545.41	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<15	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
	3/18/2008	549.24	6.68	542.56	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<15	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
	6/4/2008	549.24	8.55	540.69	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<15	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
	9/10/2008	549.24	11.78	537.46	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<15	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
	12/17/2008	549.24	6.59	542.65	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	3/23/2009	549.24	6.48	542.76	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	6/17/2009	549.24	5.15	544.09	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	9/17/2009	549.24	6.81	542.43	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
	12/16/2009	549.24	5.02	544.22	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	3/10/2010	549.24	3.55	545.69	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
6/1/2010	549.24	5.53	543.71	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	
9/29/2010	549.24	4.89	544.35	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	
1/4/2011	549.24	4.30	544.94	<25	<25	<5.0	<5.0	<5.0	<5.0	NA	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	
3/4/2011*	549.24	2.81	546.43	5.0 U	5.0 U	1.0 U	1.0 U	2.0 U	2.0 U	2.0 U	2.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	10 U	
7/12/2011	549.24	5.16	544.08	5.0 U	5.0 U	1.0 U	1.0 U	2.0 U	2.0 U	2.0 U	2.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	10 U	

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UCB Facility
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Rochester, New York
June 18, 2007 through September 28 29, 2010

Sample ID	Date	TOC Elevation	Depth to Water	Corrected Water Table Elevation	Acetone	Methyl Ethyl Ketone	Dichloro-difluoromethane	cis-1,2-Dichloroethene	Ethyl acetate	Isopropyl acetate	n-Amyl Acetate	Total Xylenes	Benzene	Chloroform	Chloromethane	1,1-Dichloroethylene	trans-1,2-Dichloroethene	Carbon Disulfide	Methylene chloride	
NYSDEC Standards					50	50	5	5	~	~	~	5	1	7	5	5	5	50	5	
RW-4 (Recovery well, gauge & sample)	8/22/2003	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	270	
	9/9/2005	NG	NG	NG	10	NA	NA	NA	NA	NA	NA	NA	BRL	NA	NA	NA	NA	NA	79	
	2/23/2007	NG	NG	NG	BRL	BRL	NA	BRL	BRL	BRL	NA	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	
	6/19/2007	547.47	5.33	542.14	<25	<25	<5.0	<5.0	<5.0	<5.0	NA	<15	<5.0	<5.0	<5.0	<5.0	<5.0	NA	7,500 D	
	9/20/2007	547.47	8.77	538.70	<5,000	<5,000	NA	<1,000	<1,000	<1,000	NA	<3,000	<1,000	<1,000	<1,000	NA	NA	NA	18,000 D	
	12/18/2007	547.47	3.22	544.25	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<15	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	
	3/17/2008	547.47	3.30	544.17	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<15	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	
	6/4/2008	547.47	16.05	531.42	<3,100	<3,100	<620	<620	<620	<620	<620	<620	<1,900	<620	<620	<620	<620	<620	8,400	
	9/10/2008	547.47	30.20	517.27	<1,200	<1,200	<250	<250	<250	<250	<250	<250	<750	<250	<250	<250	<250	<250	3,400	
	12/17/2008	547.47	29.02	518.45	<5,000	<5,000	<1,000	<1,000	<1,000	<1,000	<1,000	<3,000	<1,000	<1,000	<1,000	<1,000	<1,000	<1,000	13,000	
	3/23/2009	547.47	29.21	518.26	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	10	<5.0	<5.0	0.95 J	10,000 D	
	6/17/2009	547.47	12.86	534.61	<50	<50	<10	<10	<10	<10	<10	<20	<10	<10	<10	<10	<10	<10	78 D,B	
	9/16/2009	547.47	29.66	517.81	<1,200	<1,200	<250	<250	<250	<250	<250	<500	<250	<250	<250	<250	<250	<250	3,300	
	12/18/2009	547.47	12.98	534.49	<100	<100	<20	<20	<20	<20	<20	<40	<20	<20	<20	<20	<20	<20	240	
	3/11/2010	547.47	3.42	544.05	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	1.7 J	
	6/1/2010	547.47	5.92	541.55	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	17	
	9/28/2010	547.47	5.37	542.10	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	
1/4/2011	547.47	2.75	545.66	<25	<25	<5.0	<5.0	<5.0	<5.0	NA	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0		
3/7/2011*	547.47	2.05	546.02	5.0 U	5.0 U	1.0 U	1.0 U	2.0 U	2.0 U	2.0 U	2.0 U	2.0 U	1.0 U	1.0 U	1.0 U	1.0 U	10 U	1.0 U		
7/11/2011	547.47	3.79	544.79	5.0 U	5.0 U	1.0 U	1.0 U	2.0 U	2.0 U	2.0 U	2.0 U	2.0 U	1.0 U	1.0 U	1.0 U	1.0 U	10 U	1.0 U		
RW-5 (Recovery well, gauge & sample)	8/26/2003	NG	NG	NG	8.1	2.4 J	BRL	0.88 J	NA	NA	NA	BRL	BRL	BRL	0.54 J	NA	BRL	NA	120	
	9/12/2005	NG	NG	NG	BRL	NA	NA	NA	NA	NA	NA	NA	BRL	NA	NA	NA	NA	NA	BRL	
	2/23/2007	NG	NG	NG	BRL	BRL	NA	BRL	BRL	BRL	NA	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	
	6/20/2007	547.27	22.66	524.61	<25	<25	<5.0	<5.0	<5.0	<5.0	NA	<15	<5.0	<5.0	5.3	<5.0	<5.0	NA	45,000 D	
	9/20/2007	547.27	28.97	518.30	<250	<250	NA	<50	<50	<50	NA	<150	<50	<50	<50	NA	NA	NA	1,000	
	12/18/2007	547.27	3.05	544.22	<250	<250	<50	<50	<50	<50	<50	<150	<50	<50	<50	<50	<50	<50	770	
	3/17/2008	547.27	14.13	537.28	320	<250	<50	<50	<50	<50	<50	<150	<50	<50	<50	<50	<50	<50	530	
	6/4/2008	547.27	46.08	514.69	<250	<250	<50	<50	<50	<50	<50	<150	<50	<50	<50	<50	<50	<50	410	
	9/10/2008	547.27	41.68	517.80	<12,000	<12,000	<2,500	<2,500	<2,500	<2,500	<2,500	<7,500	<2,500	<2,500	<2,500	<2,500	<2,500	<2,500	25,000	
	12/17/2008	547.27	9.99	540.21	<2,500	<2,500	<500	<500	<500	<500	<500	<1,500	<500	<500	<500	<500	<500	<500	6,600	
	3/23/2009	547.27	45.36	515.20	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	22 B	
35'	6/17/2009	547.27	42.89	516.94	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<1.1	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	2.2 J,B	
	9/17/2009	547.27	44.76	515.62	<120	<120	<25	<25	<25	<25	<25	<50	<25	<25	<25	<25	<25	<25	630	
	12/17/2009	547.27	13.25	537.90	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	40	
	3/10/2010	547.27	4.50	544.09	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	1.4 J	
	6/1/2010	547.27	7.43	542.02	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	
	9/28/2010	547.27	5.77	543.19	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	
	1/4/2011	547.27	4.56	544.05	<25	<25	<5.0	<5.0	<5.0	<5.0	NA	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	
	3/7/2011*	547.27	3.38	544.88	5.0 U	5.0 U	1.0 U	1.0 U	2.0 U	2.0 U	2.0 U	2.0 U	2.0 U	1.0 U	1.0 U	1.0 U	1.0 U	10 U	1.0 U	
	7/11/2011	547.27	5.72	543.23	5.0 U	5.0 U	1.0 U	1.0 U	2.0 U	2.0 U	2.0 U	2.0 U	2.0 U	1.0 U	1.0 U	1.0 U	1.0 U	10 U	1.0 U	
	23'	3/23/2009	547.27	45.36	515.20	<2500	<2500	<500	<500	<500	<500	<500	<1,000	<500	<500	<500	<500	<500	<500	8,900 D
		6/17/2009	547.27	42.89	516.94	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	0.94 J,B
9/17/2009		547.27	44.76	515.62	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	
12/17/2009		547.27	13.25	537.90	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	32	
3/10/2010		547.27	4.50	544.09	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	1.5 J	
6/1/2010		547.27	7.43	542.02	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	
9/28/2010		547.27	5.77	543.19	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	
1/4/2011		547.27	4.56	544.05	<25	<25	<5.0	<5.0	<5.0	<5.0	NA	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	
3/7/2011*	547.27	3.38	544.88	5.0 U	5.0 U	1.0 U	1.0 U	2.0 U	2.0 U	2.0 U	2.0 U	2.0 U	1.0 U	1.0 U	1.0 U	1.0 U	10 U	1.0 U		
7/11/2011	547.27	5.72	543.23	20 U	10 U	NA	5.0 U	NA	NA	NA	5.0 U	5.0 U	5.0 U	5.0 U	5.0 U	NA	5.0U	10 U	NA	

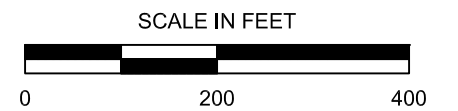
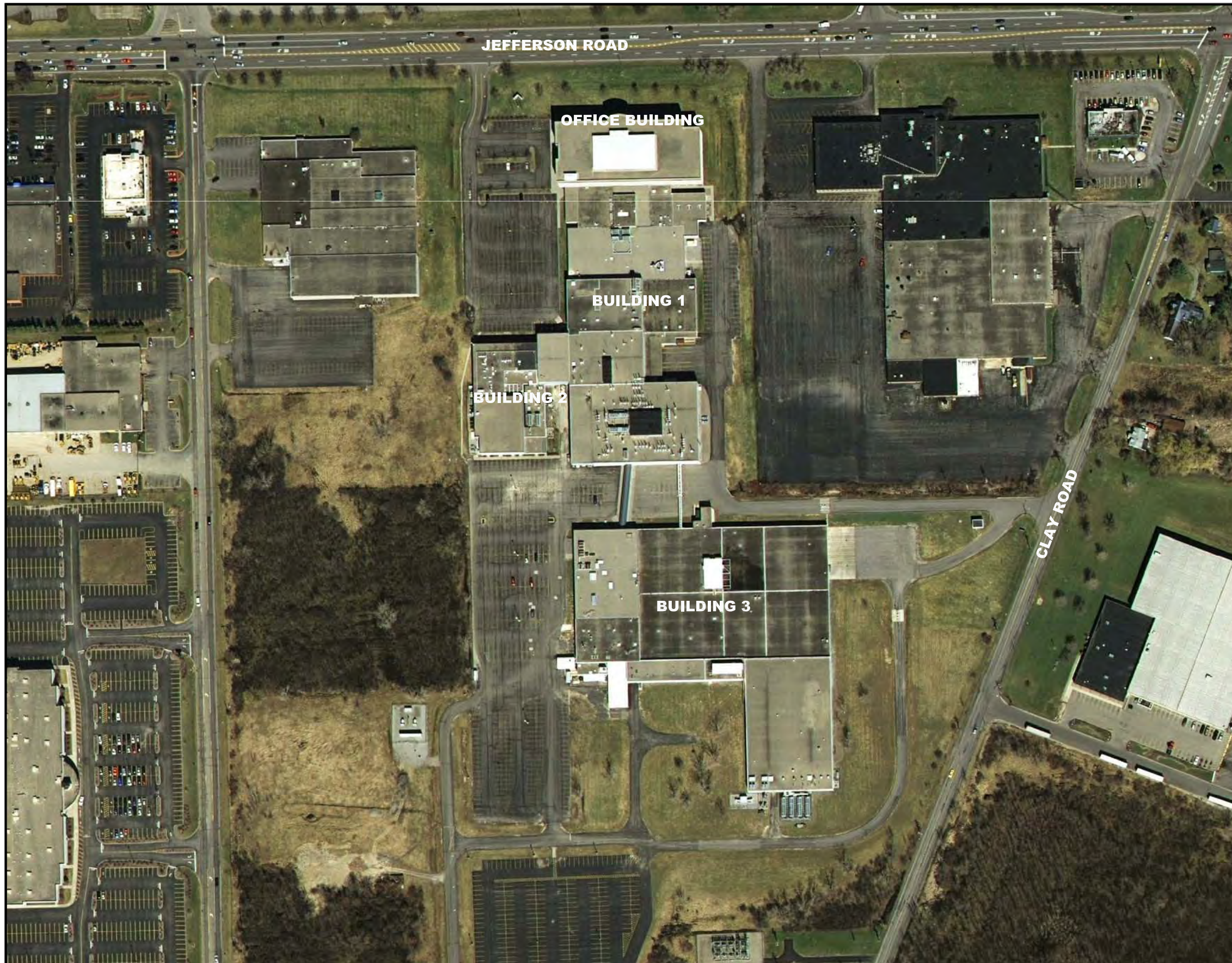
**Table 1
MONITORING WELL GAUGING AND GROUNDWATER ANALYTICAL DATA**

UCB Facility
755 Jefferson Road
Rochester, New York
June 18, 2007 through September 28 29, 2010

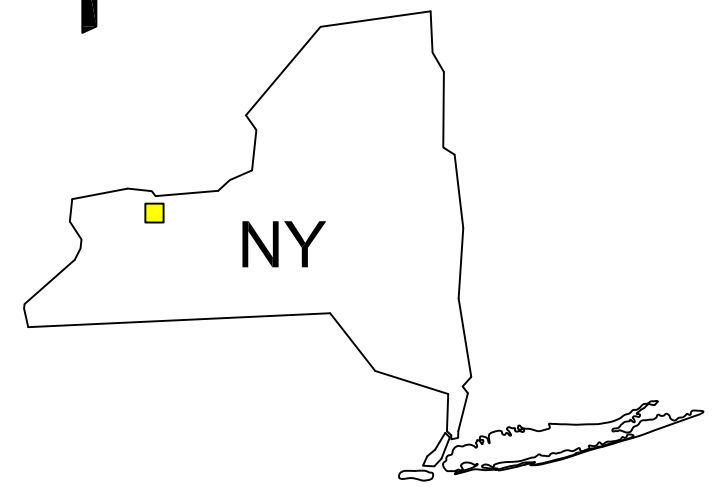
Sample ID	Date	TOC Elevation	Depth to Water	Corrected Water Table Elevation	Acetone	Methyl Ethyl Ketone	Dichloro-difluoromethane	cis-1,2-Dichloroethene	Ethyl acetate	Isopropyl acetate	n-Amyl Acetate	Total Xylenes	Benzene	Chloroform	Chloromethane	1,1-Dichloroethylene	trans-1,2-Dichloroethene	Carbon Disulfide	Methylene chloride
NYSDEC Standards					50	50	5	5	~	~	~	5	1	7	5	5	5	50	5
RW-6 (Recovery well, gauge & sample)	8/26/2003	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	140,000
	9/9/2005	NG	NG	NG	5	NA	NA	NA	NA	NA	NA	NA	BRL	NA	NA	NA	NA	NA	3,300 D
	2/22/2007	NG	NG	NG	BRL	BRL	NA	BRL	BRL	BRL	NA	BRL	BRL	BRL	BRL	NA	NA	NA	BRL
	6/20/2007	547.89	12.71	535.18	<25	<25	<5.0	<5.0	<5.0	<5.0	NA	<15	<5.0	<5.0	<5.0	<5.0	<5.0	NA	<5.0
	9/20/2007	547.89	17.40	530.49	<25	<25	NA	<5.0	<5.0	<5.0	NA	<15	<5.0	<5.0	<5.0	NA	NA	NA	<5.0
	12/19/2007	547.89	1.62	546.27	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<15	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
	3/18/2008	547.89	4.58	543.31	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<15	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
	6/4/2008	547.89	36.96	510.93	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<15	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
	9/11/2008	547.89	37.58	510.31	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<15	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
	12/17/2008	547.89	38.38	509.51	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	3/23/2009	547.89	7.91	539.98	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	6/17/2009	547.89	33.77	514.12	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	9/17/2009	547.89	9.91	537.98	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
	12/16/2009	547.89	11.76	536.13	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	3/10/2010	547.89	4.51	543.38	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	6/1/2010	547.89	6.70	541.19	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	9/28/2010	547.89	5.89	542.00	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
1/4/2011	547.89	4.34	544.02	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	NA	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	
3/4/2011*	547.89	2.97	545.24	5.0 U	5.0 U	1.0 U	1.0 U	2.0 U	2.0 U	2.0 U	2.0 U	2.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	10 U	1.0 U
7/12/2011	547.89	2.97	542.60	5.0 U	5.0 U	1.0 U	1.0 U	2.0 U	2.0 U	2.0 U	2.0 U	2.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	10 U	1.0 U

Notes:
 <1.0 - Not detected at or above the laboratory reporting limit shown.
^a - Sample results are from a pumping test
 All units reported in µg/L - micrograms per liter (parts per billion)
 B - analyte found in the associated blank, as well as in the sample
Bolded - Detection above laboratory reporting limits
 BRL - Below laboratory reporting limits
 BTEX - benzene, toluene, ethylbenzene, and total xylenes.
 Corrected Water Table Elevation - Determined by trigonometry for wells MW-D9, MW-D11 to MW-D13, and RW-4 to RW-6
 D - Surrogate recovery unreportable due to dilution.
 DRY - Insufficient water to gauge or sample
 J - The reported concentration is estimated (the result is less than the sample quantitation limit but greater than zero)
 NA - not analyzed
 NG - not gauged/or data not available
 NS - not sampled
 NYSDEC Standards and Guidance Values - New York State Department of Environmental Conservation Technical and Operational Guidance Series (TOGS) 1.1.1, Ambient Water Quality Standards and Guidance Values, June 1998 and Addendum April 2000
 Shading - Reported concentration detected above the applicable standard(s) or guidance value(s)
 U - Analyte was analyzed for but not detected. The sample quantitation limit has been corrected for dilution and for percent moisture, unless otherwise noted in the case narrative
 *-Laboratory has been changed and the reporting format has been amended from a less than value format to the laboratory method reporting limit followed by a "U" qualifier

FIGURES



LATITUDE: 43° 05' 03" N
 LONGITUDE: 77° 37' 19" W



SITE LOCATION

NEWBURGH, NY

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REFERENCES:

1. AERIAL IMAGES "w_14041124_12_09000_col_20051.sid" AND "w_14041126_12_09000_col_20051.sid" © NYS CLEARING HOUSE.
2. KLEINFELDER FIELD RESEARCH.



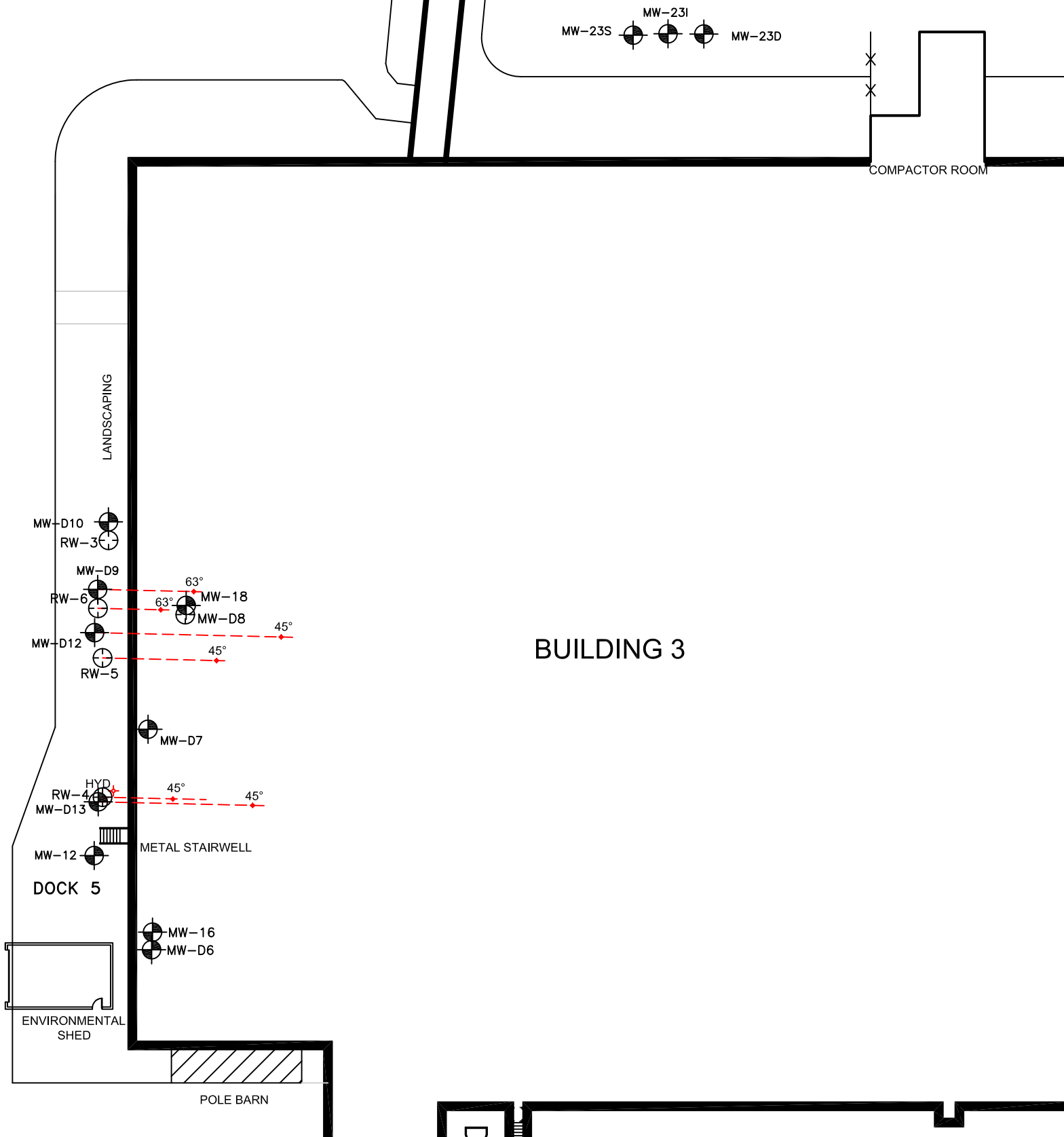
PROJECT NO.	105651
DRAWN:	01/19/10
DRAWN BY:	KAW
CHECKED BY:	TS
FILE NAME:	SANOFISSURJAN10.dwg

AREA MAP	
UCB FACILITY NYSDEC VCP# V00126-8 755 JEFFERSON ROAD ROCHESTER	
MONROE COUNTY	NEW YORK







FIGURE
1

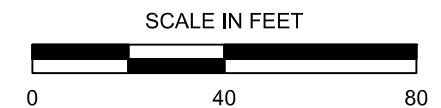


BUILDING 3 EMPLOYEE PARKING



LEGEND

-  MONITORING WELL
-  RECOVERY WELL
-  PIEZOMETER
-  FIRE HYDRANT
-  AREA LIGHT
-  ANGLED WELL (ANGLE MEASURED FROM GROUND SURFACE)



NEWBURGH, NY

REFERENCES:

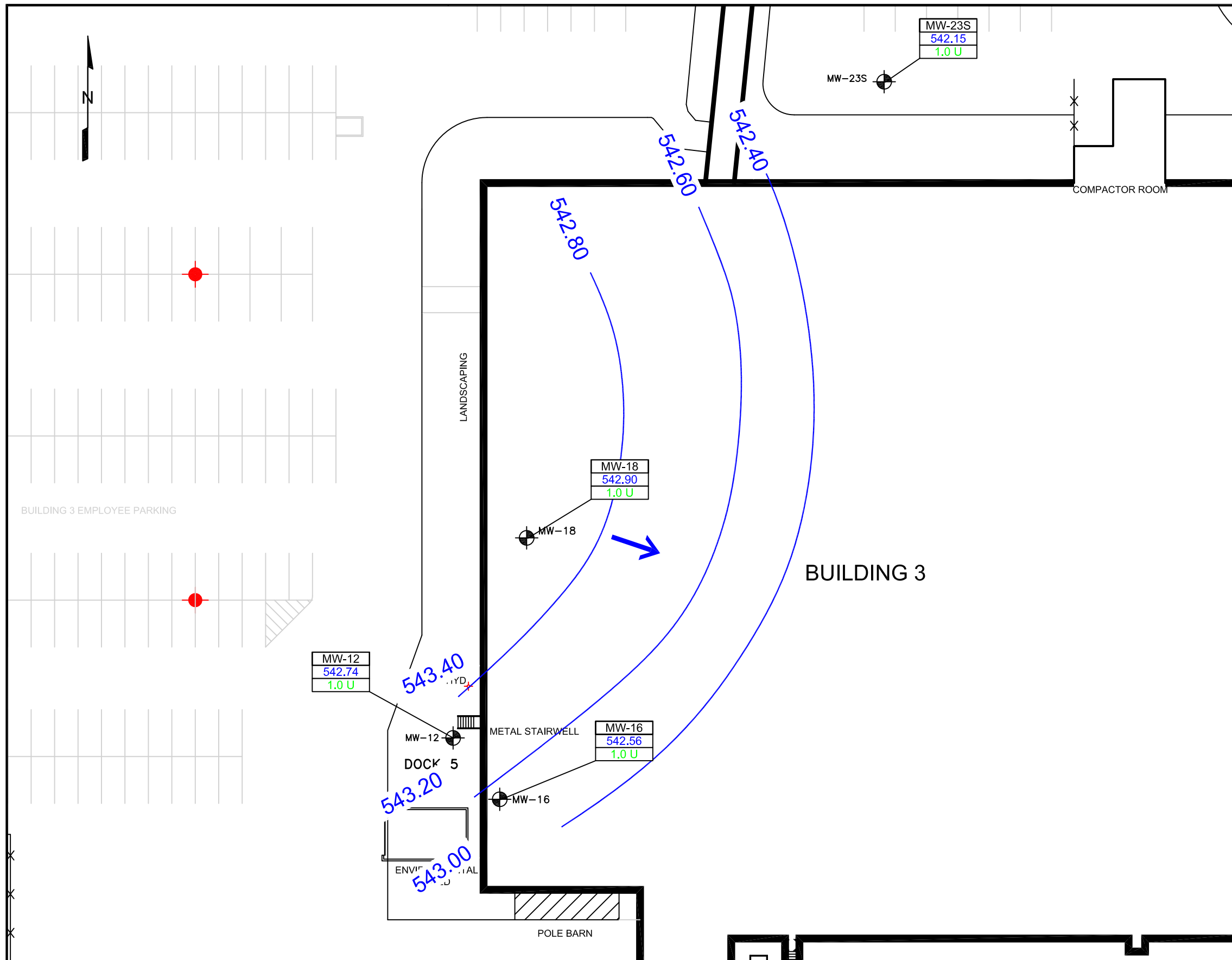
1. "WELL LOCATION MAP" PREPARED BY ERM, DATED SEPTEMBER, 2006.
2. "MONITORING WELL SURVEY" PREPARED BY PARRON ENGINEERING.
3. "SITE PLAN UNDERGROUND UTILITIES OVERVIEW", REVISION DATE JANUARY 2007.
4. KLEINFELDER FIELD RESEARCH.

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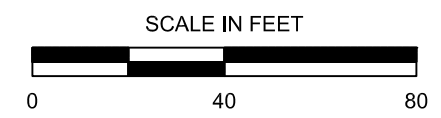


PROJECT NO.	119502
DRAWN:	09/28/11
DRAWN BY:	CTH
CHECKED BY:	AW
FILE NAME:	QEEMR JUL11.dwg

SITE PLAN		FIGURE 2
UCB FACILITY NYSDEC VCP# V00126-8 755 JEFFERSON ROAD ROCHESTER		
MONROE COUNTY	NEW YORK	



LEGEND	
	MONITORING WELL
	RECOVERY WELL
	PIEZOMETER
	FIRE HYDRANT
	AREA LIGHT
	MONITORING WELL IDENTIFICATION GROUNDWATER ELEVATION (FEET) METHYLENE CHLORIDE (µg/L)
	APPARENT GROUNDWATER FLOW DIRECTION
	WATER-TABLE CONTOUR (0.2 FOOT INTERVAL) (DASHED WHERE INFERRED)
µg/L	MICROGRAMS PER LITER
U	ANALYTE WAS ANALYZED FOR BUT NOT DETECTED



- NOTES:
- GROUNDWATER MONITORING WELLS WERE GAUGED AND SAMPLED BETWEEN JULY 8 AND JULY 13, 2011.
 - SYSTEM WAS NOT OPERATIONAL AT THE TIME OF GAUGING AND SAMPLING.

- REFERENCES:
- "WELL LOCATION MAP" PREPARED BY ERM, DATED SEPTEMBER, 2006.
 - "MONITORING WELL SURVEY" PREPARED BY PARRON ENGINEERING.
 - "SITE PLAN UNDERGROUND UTILITIES OVERVIEW", REVISION DATE JANUARY 2007.
 - KLEINFELDER FIELD RESEARCH.

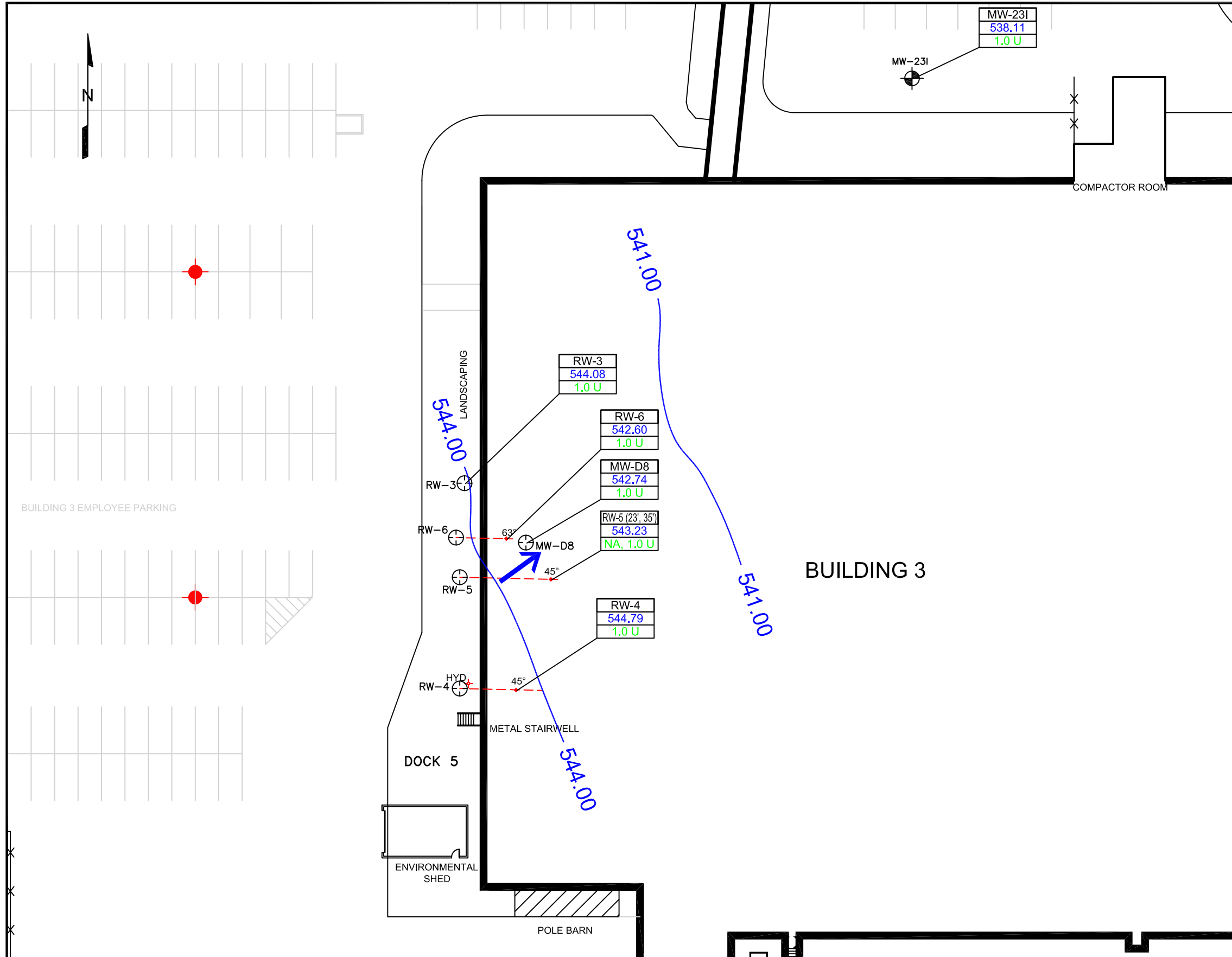


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DRAWN BY:	CTH
CHECKED BY:	AW
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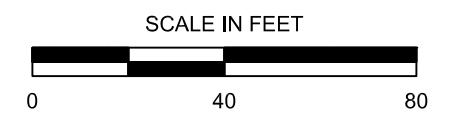
GROUNDWATER CONTOUR AND CONCENTRATIONS MAP SHALLOW WELLS	UCB FACILITY NYSDEC VCP# V00126-8 755 JEFFERSON ROAD ROCHESTER	MONROE COUNTY NEW YORK

NEWBURGH, NY

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LEGEND	
	MONITORING WELL
	RECOVERY WELL
	PIEZOMETER
	FIRE HYDRANT
	AREA LIGHT
	ANGLED WELL (ANGLE MEASURED FROM GROUND SURFACE)
	MONITORING WELL IDENTIFICATION GROUNDWATER ELEVATION (FEET) METHYLENE CHLORIDE (µg/L)
	APPARENT GROUNDWATER FLOW DIRECTION
	WATER-TABLE CONTOUR (2.5 FOOT INTERVAL) (DASHED WHERE INFERRED)
µg/L	MICROGRAMS PER LITER
U	ANALYTE WAS ANALYZED FOR BUT NOT DETECTED



- NOTES:
- GROUNDWATER MONITORING WELLS WERE GAUGED AND SAMPLED BETWEEN JULY 8 AND JULY 13, 2011.
 - SYSTEM WAS NOT OPERATIONAL AT THE TIME OF GAUGING AND SAMPLING.

- REFERENCES:
- "WELL LOCATION MAP" PREPARED BY ERM, DATED SEPTEMBER, 2006.
 - "MONITORING WELL SURVEY" PREPARED BY PARRON ENGINEERING.
 - "SITE PLAN UNDERGROUND UTILITIES OVERVIEW", REVISION DATE JANUARY 2007.
 - KLEINFELDER FIELD RESEARCH.

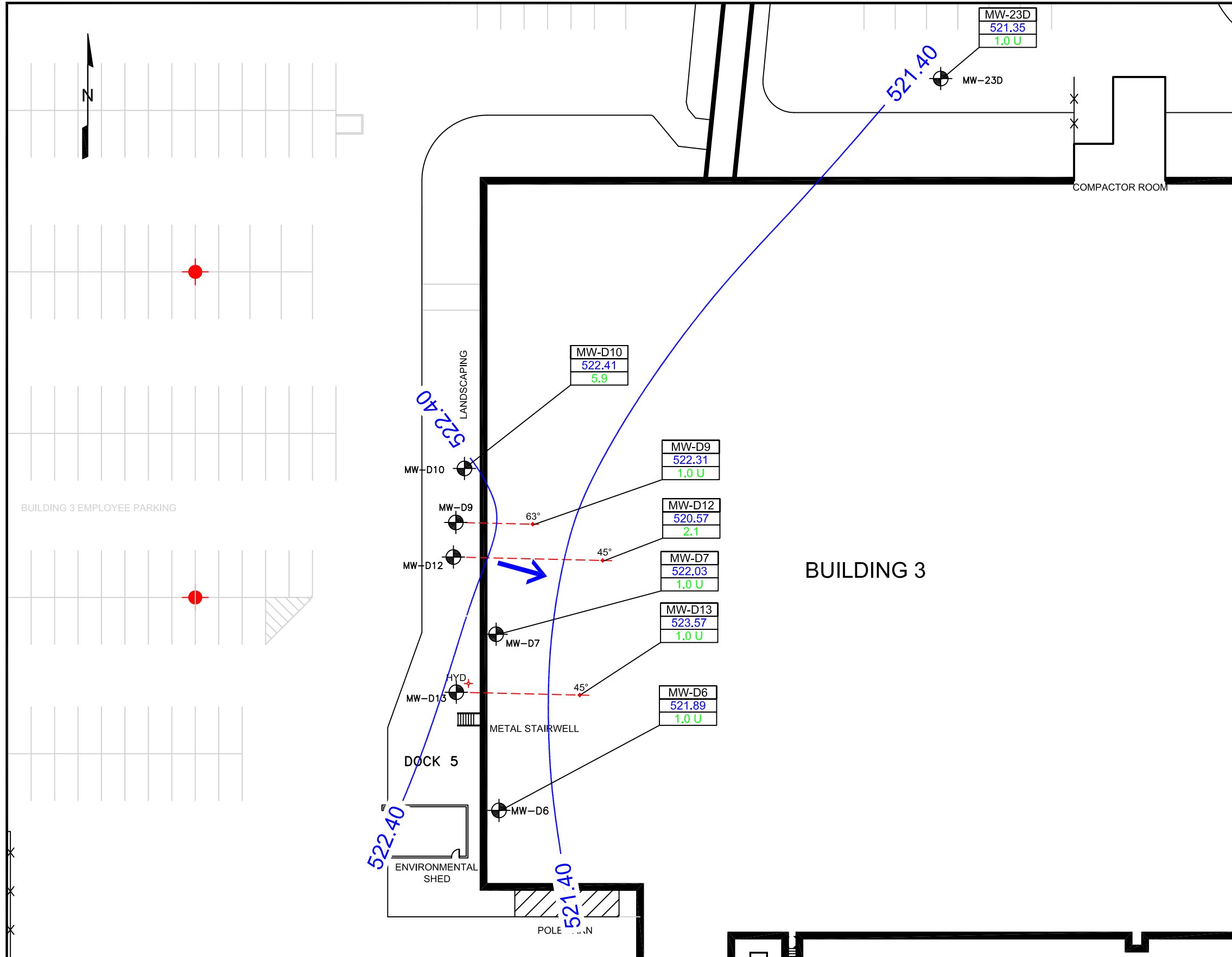


PROJECT NO.	119502
DRAWN:	09/28/11
DRAWN BY:	CTH
CHECKED BY:	AW
FILE NAME:	QEEMR JUL11.dwg

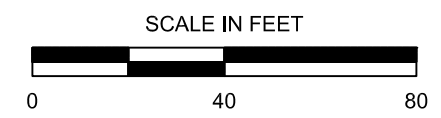
GROUNDWATER CONTOUR AND CONCENTRATIONS MAP INTERMEDIATE WELLS		FIGURE 4
UCB FACILITY NYSDEC VCP# V00126-8 755 JEFFERSON ROAD ROCHESTER		
MONROE COUNTY	NEW YORK	

NEWBURGH, NY

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LEGEND	
	MONITORING WELL
	RECOVERY WELL
	PIEZOMETER
	FIRE HYDRANT
	AREA LIGHT
	ANGLED WELL (ANGLE MEASURED FROM GROUND SURFACE)
	MONITORING WELL IDENTIFICATION GROUNDWATER ELEVATION (FEET) METHYLENE CHLORIDE (µg/L)
	APPARENT GROUNDWATER FLOW DIRECTION
	WATER-TABLE CONTOUR (0.5 FOOT INTERVAL) (DASHED WHERE INFERRED)
µg/L	MICROGRAMS PER LITER
U	ANALYTE WAS ANALYZED FOR BUT NOT DETECTED



NOTES:
 1. GROUNDWATER MONITORING WELLS WERE GAUGED AND SAMPLED BETWEEN JULY 8 AND JULY 13, 2011.
 2. SYSTEM WAS NOT OPERATIONAL AT THE TIME OF GAUGING AND SAMPLING.
 3. MONITORING WELL MW-D13 WAS OMITTED FROM GROUNDWATER CONTOURING DUE TO ANOMOLOUS DATA

REFERENCES:
 1. "WELL LOCATION MAP" PREPARED BY ERM, DATED SEPTEMBER, 2006.
 2. "MONITORING WELL SURVEY" PREPARED BY PARRON ENGINEERING.
 3. "SITE PLAN UNDERGROUND UTILITIES OVERVIEW", REVISION DATE JANUARY 2007.
 4. KLEINFELDER FIELD RESEARCH.



PROJECT NO.	119502
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GROUNDWATER CONTOUR AND CONCENTRATIONS MAP DEEP WELLS

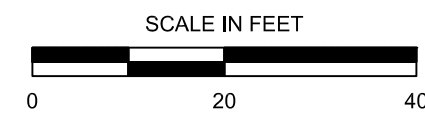
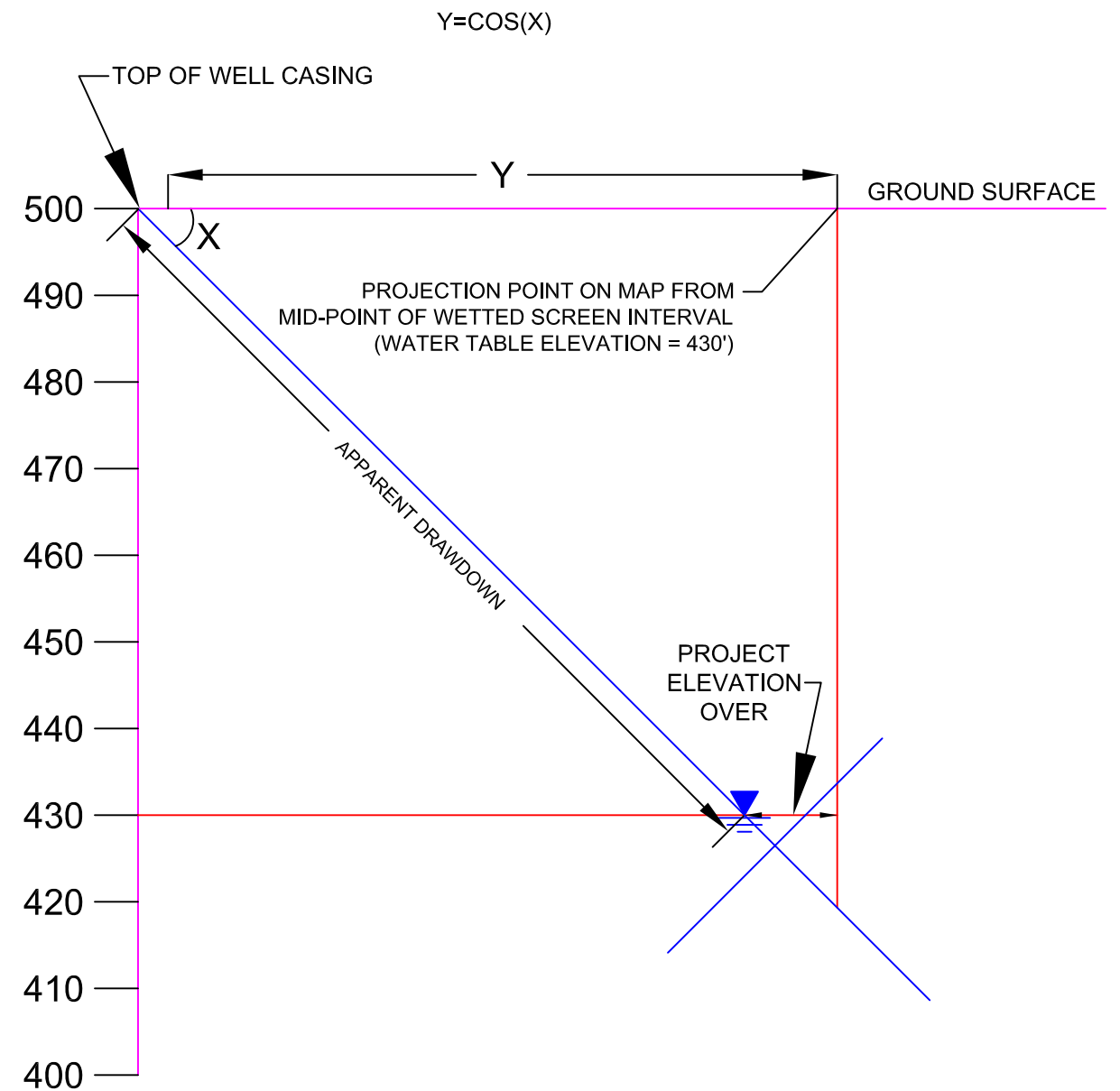
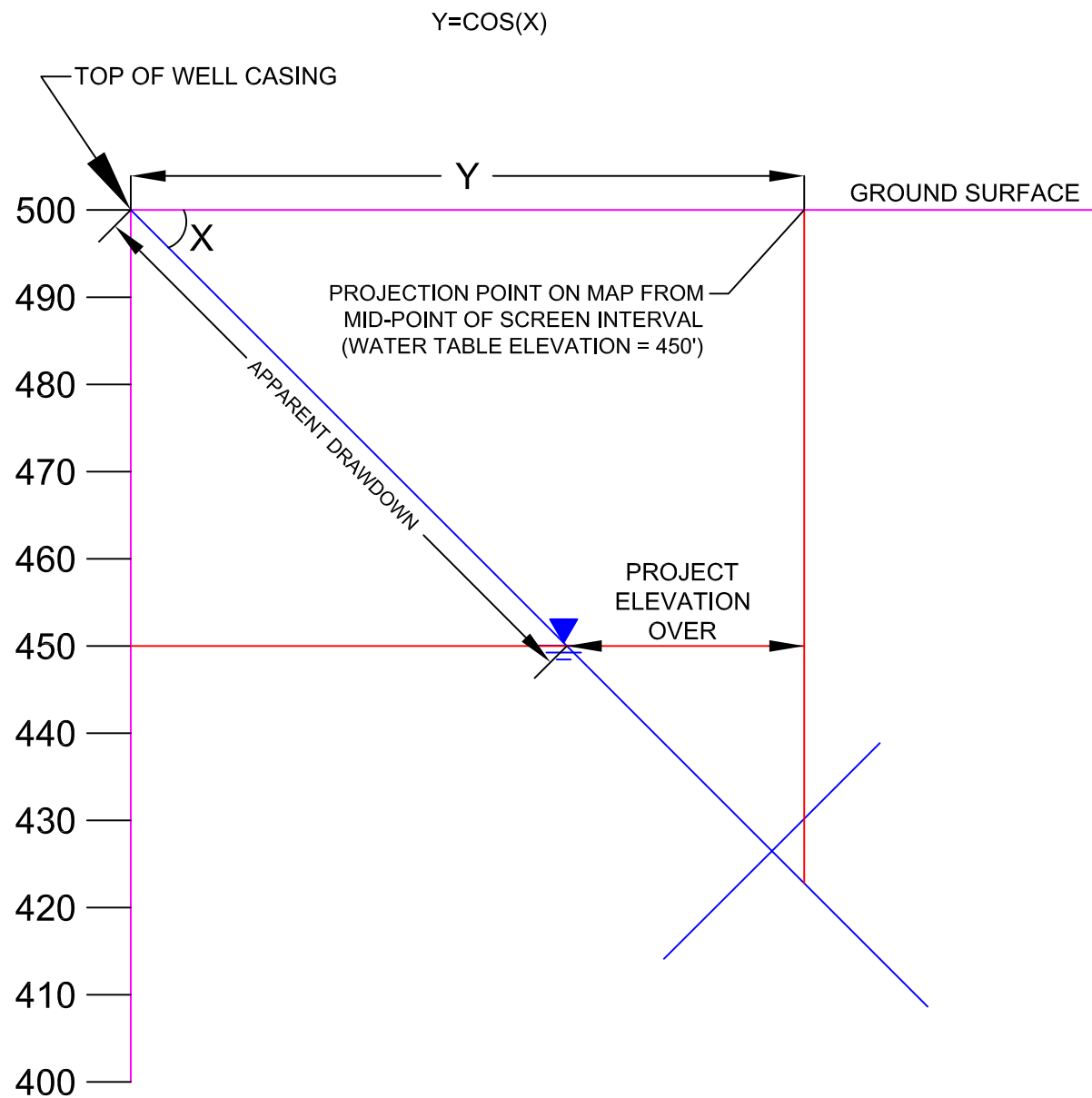
UCB FACILITY
 NYSDEC VCP# V00126-8
 755 JEFFERSON ROAD
 ROCHESTER

MONROE COUNTY NEW YORK

FIGURE
5

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PROJECT NO.	119502
DRAWN:	09/28/11
DRAWN BY:	CTH
CHECKED BY:	AW
FILE NAME:	QEEMR JUL11.dwg

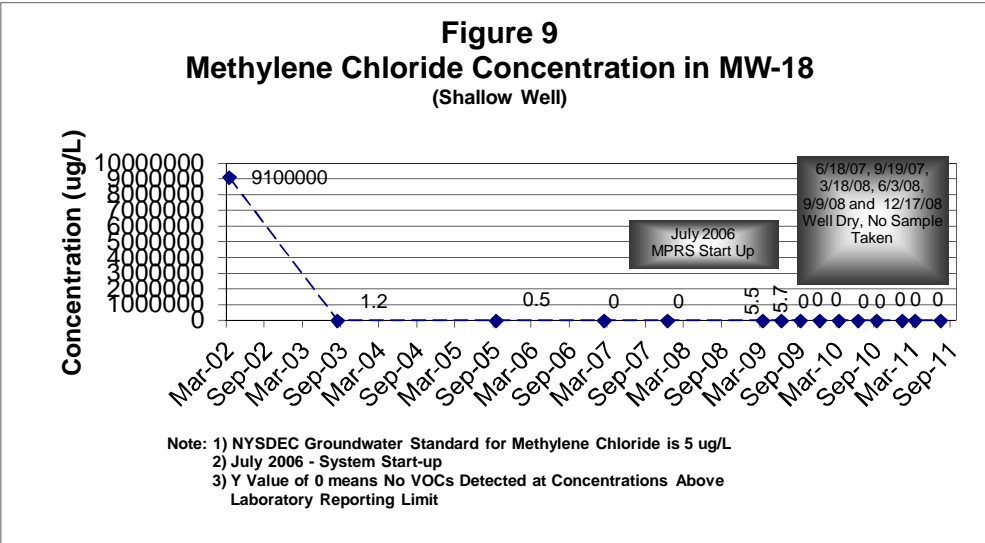
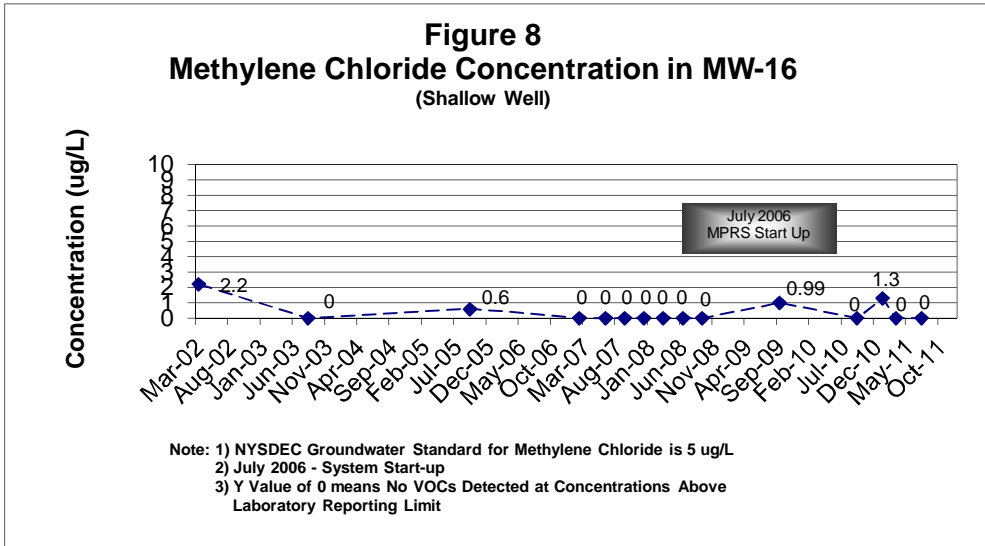
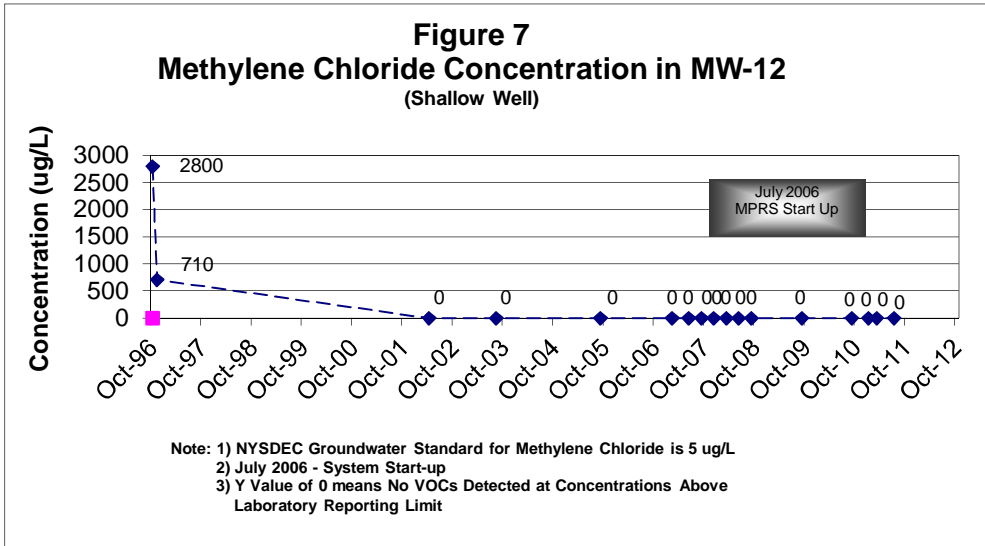
**DIAGONAL WELL
POTENTIOMETRIC CONVERSION**

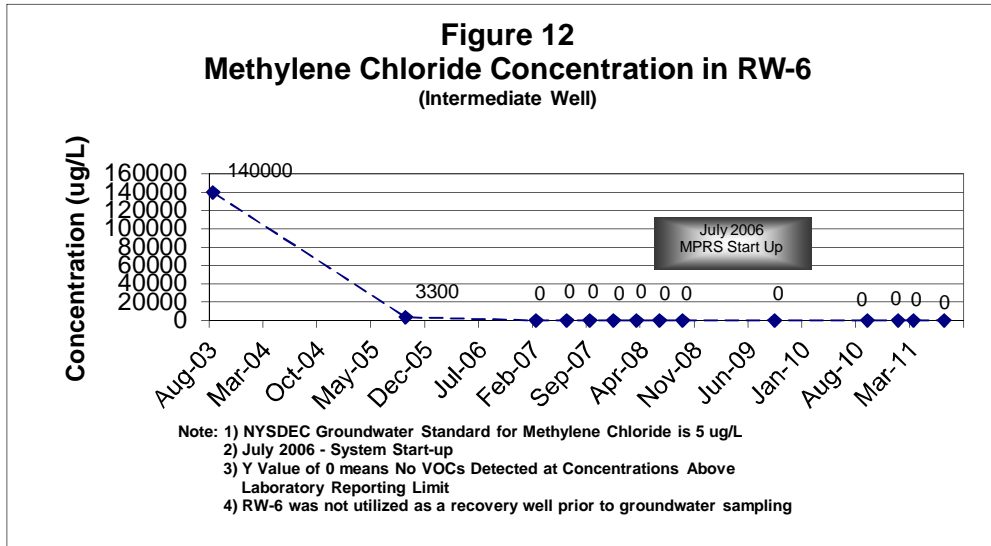
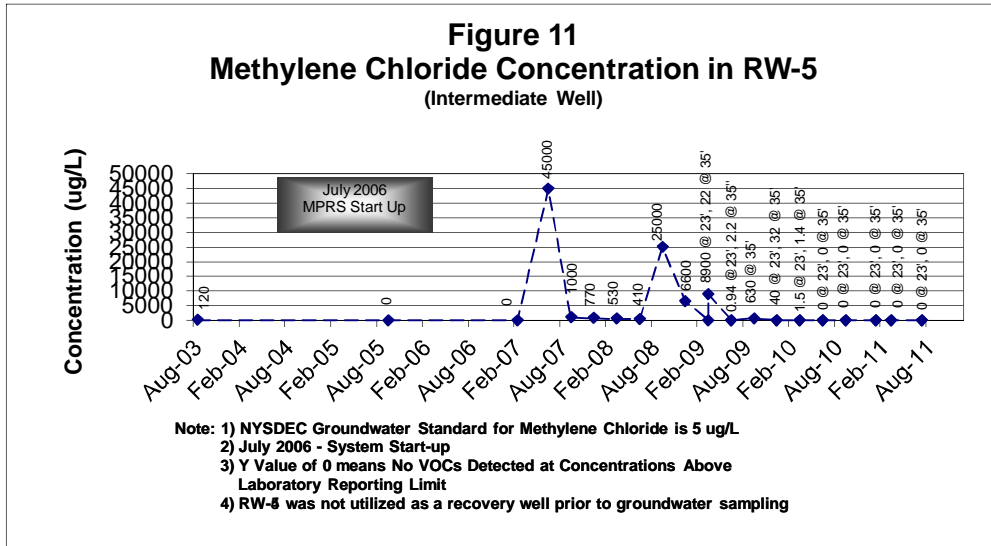
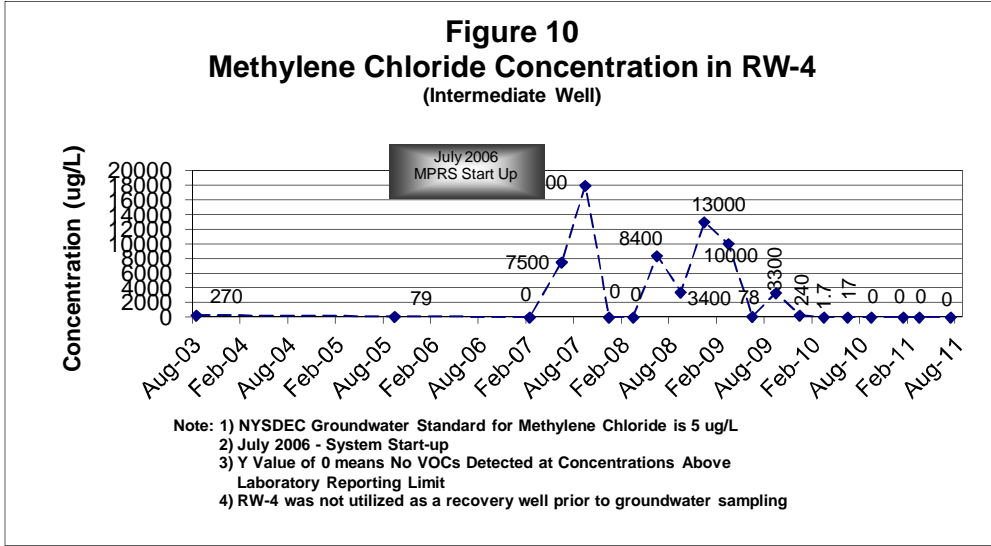
UCB FACILITY
NYSDEC VCP# V00126-8
755 JEFFERSON ROAD
ROCHESTER

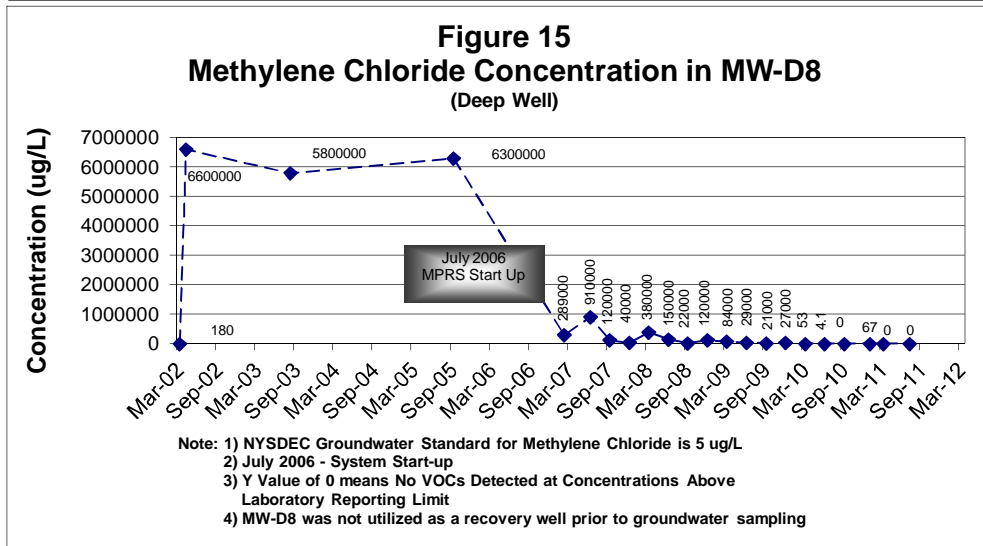
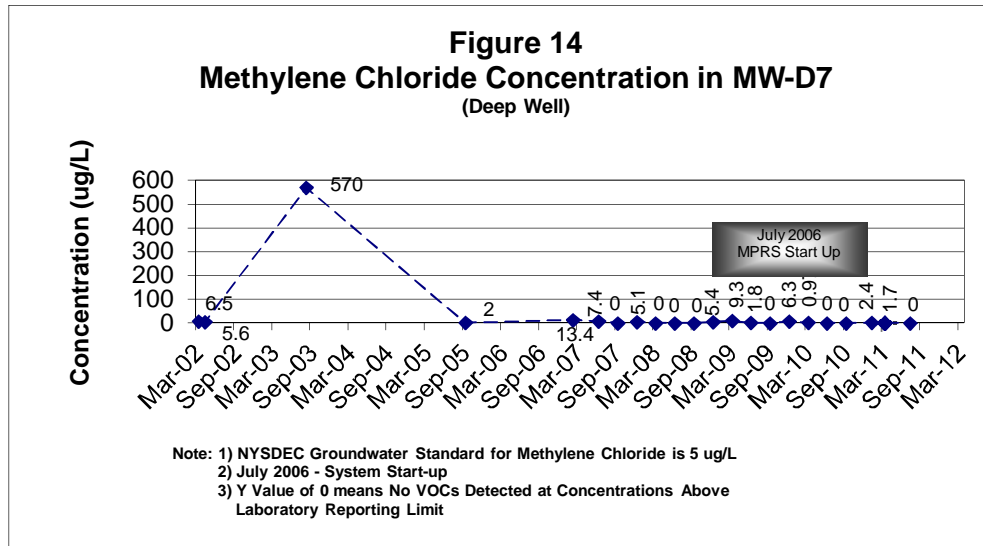
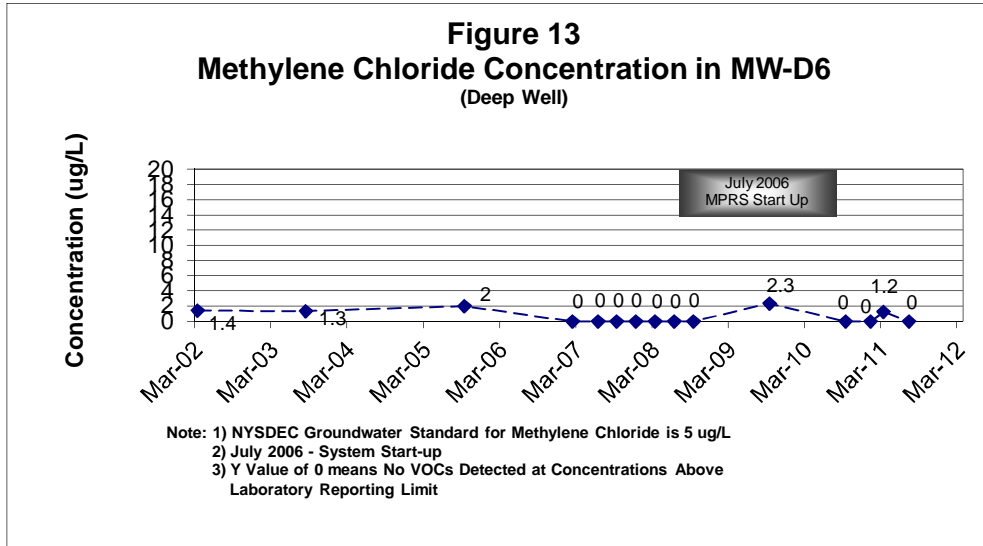
MONROE COUNTY NEW YORK

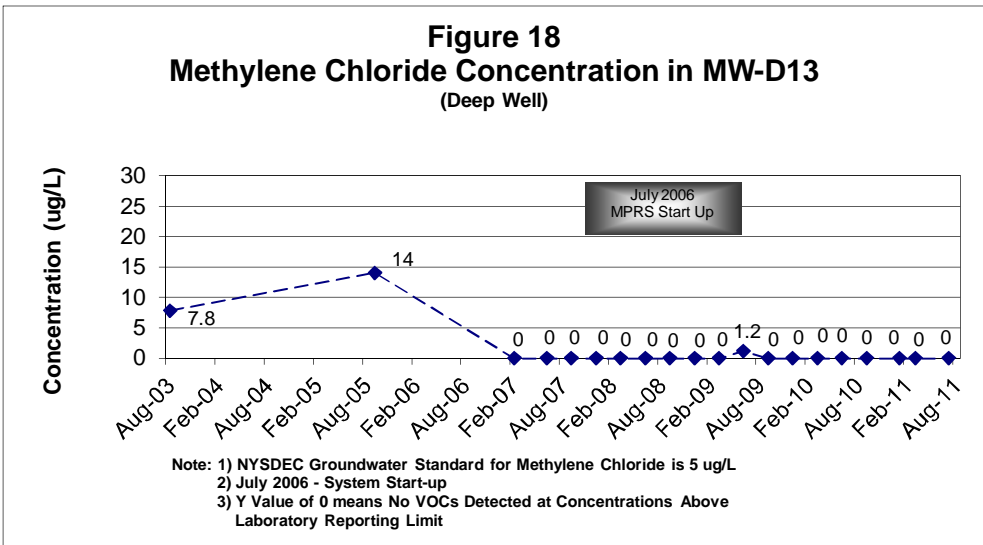
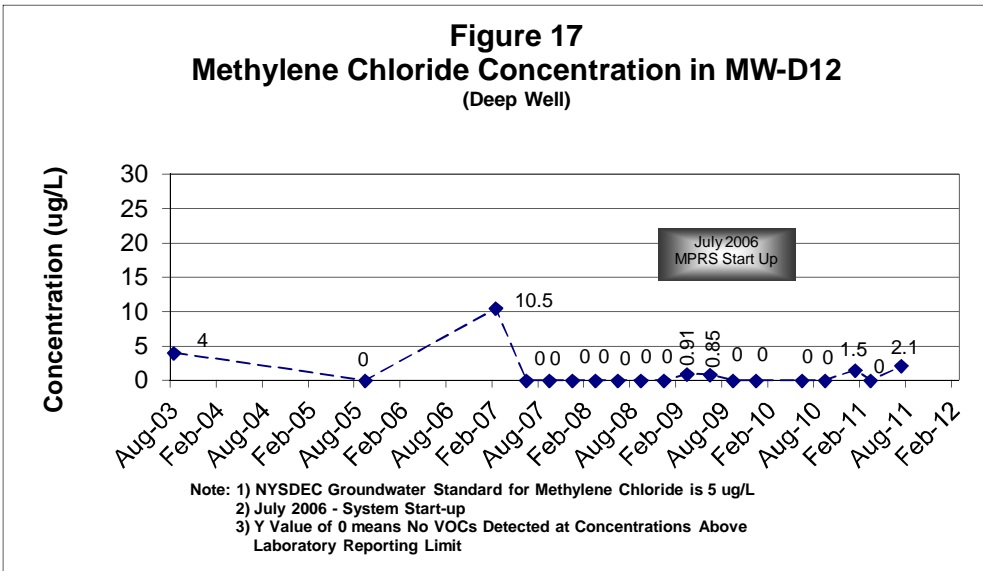
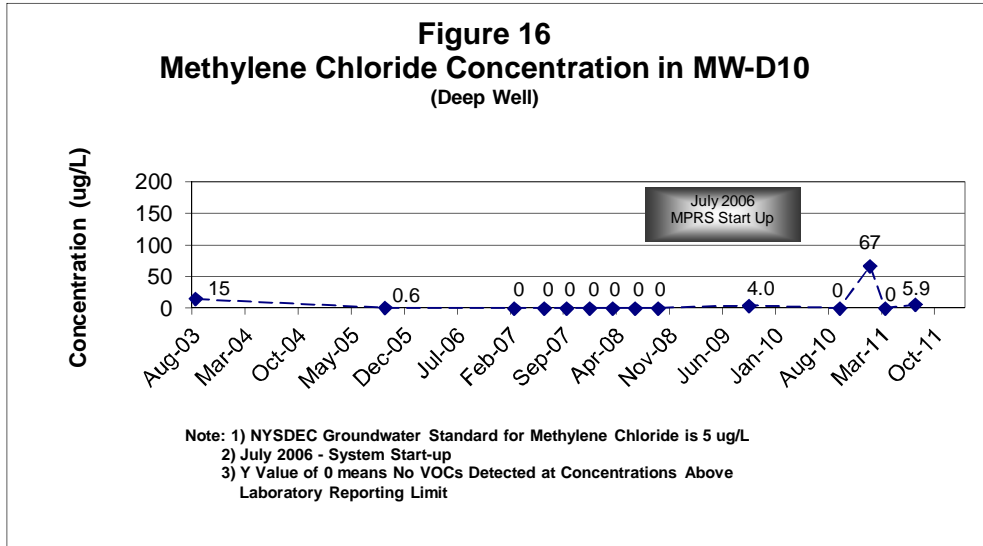
FIGURE
6

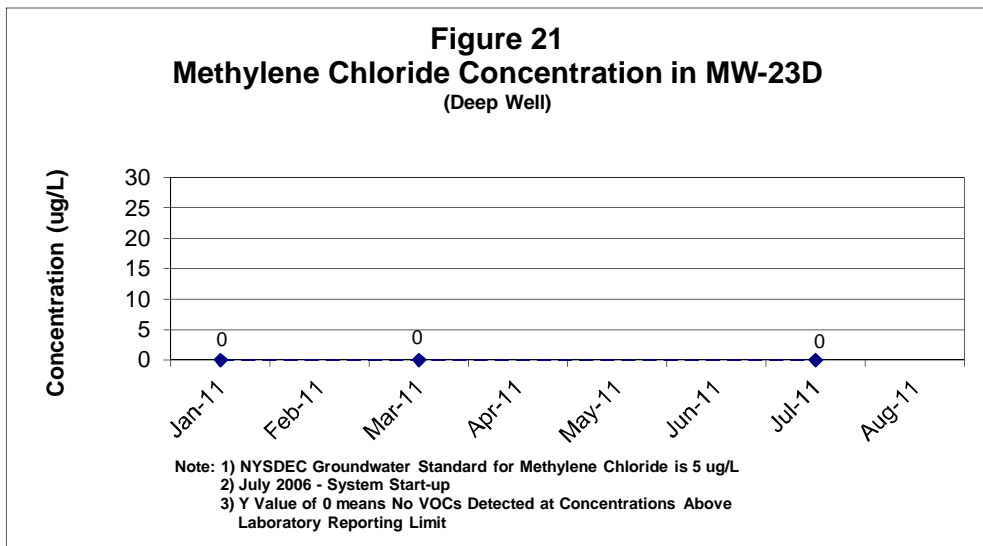
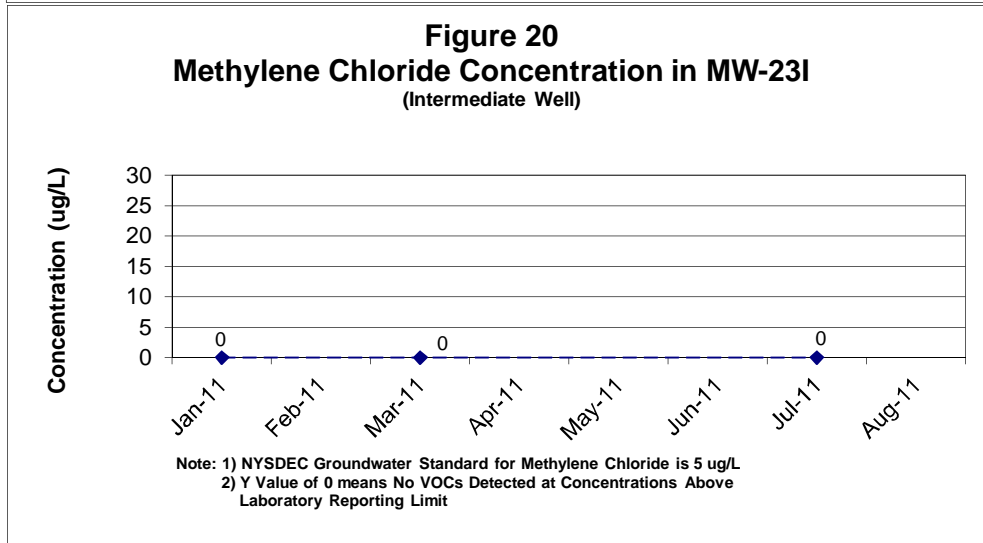
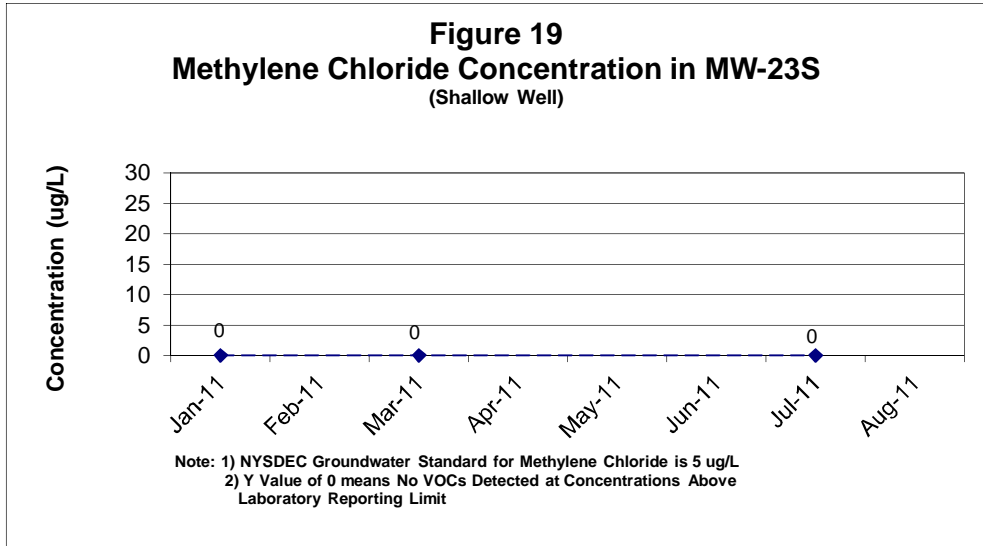
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June 21, 2011

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: First Quarter 2011 Environmental Effectiveness and Third Round Post-Closure Monitoring Report
UCB Manufacturing Inc.
755 Jefferson Road Facility – Henrietta, New York
NYSDEC VCP Number: V00126-8

Dear Mr. MacLean:

On behalf of UCB Manufacturing Inc. (UCB), please find enclosed the Quarterly Environmental Effectiveness Monitoring Report for the above-referenced Site for the first quarter of 2011 covering the time period from February 1, 2011 through March 31, 2011. This report is being submitted in accordance with the requirements described in Section 6.2 of the draft Operation, Maintenance & Monitoring (OM&M) Plan.

On March 3, 4, 7 and 8, 2011, Kleinfelder East, Inc. (Kleinfelder) completed quarterly liquid gauging and groundwater sampling at the Site pursuant to Section 4.3 of the draft OM&M Plan and the addendum to the OM&M Plan submitted in August 2007.

Groundwater quality analytical results are summarized on Table 1. As agreed to by NYSDEC at our meeting on November 18, 2010, this quarterly monitoring serves as the third round of post-closure monitoring.

If you require additional information or clarification, please contact the undersigned at (845) 567-6530 or Rick Bethel of Quantum Management Group, Inc. at (513) 314-7543.

Sincerely,
Kleinfelder East, Inc.

Rose M. Weissman
Senior Project Manager

Alexander Wirth
Senior Project Geologist

Enclosure

Copy: Rick Bethel – Quantum Management Group, Inc.
John Lang – Quantum Management Group, Inc.
Michael Bogdan – Sanofi Aventis
Richard Ricci – Lowenstein Sandler PC
Jean McCreary – Nixon Peabody
Libby Ford – Nixon Peabody
File

**755 Jefferson Road Site, Henrietta, NY
QUARTERLY ENVIRONMENTAL EFFECTIVENESS MONITORING REPORT**

Site Address: Jefferson Road Facility 755 Jefferson Road Henrietta, New York	Regulatory Agency: NYSDEC – Region 8 Regulatory Contact: Gregory B. MacLean, P.E.
NYSDEC VCP No.: V00126-8	Consultant: Quantum Management Inc. (QMG), Kleinfelder East, Inc.
UCB Contact: Greg Light	Project Manager / Senior Project Geologist: Rick Bethel (QMG), Alexander Wirth (KLF)

Report Date: June 21, 2011

Current Site Status: Active pharmaceutical manufacturing facility.

Monitoring Period: First quarter 2011 (February 1 through March 31).

Work Performed: Quarterly environmental effectiveness monitoring pursuant to Section 4.3 of the draft Operation, Maintenance & Monitoring (OM&M) plan submitted to New York State Department of Environmental Conservation (NYSDEC) in May 2007 and the addendum to the OM&M Plan submitted in August 2007. As agreed to by NYSDEC at our meeting on November 18, 2010, this quarterly monitoring serves as the third round of post-closure monitoring. The post-closure monitoring plan is included in Section 3 of the pending revised Site Management Plan which was submitted to NYSDEC in June 2011.

Gauged 17 monitoring wells and collected groundwater samples from 17 monitoring wells between March 3 and 8, 2011. The wells included the three sentinel wells installed along the north side of Building 3.

Three sentinel wells and three soil borings were installed in December 2010 and January 2011.

Groundwater Monitoring:

Number of Wells:	17
Gauging Frequency:	Quarterly
Sampling Frequency:	Quarterly
Overburden Groundwater Depth:	1.27 feet to 39.34 feet

Shallow Groundwater Flow:	Southeast
Intermediate Groundwater Flow:	Southeast
Deep Groundwater Flow:	Southeast

Shallow Groundwater Gradient:	0.007	feet per foot
Intermediate Groundwater Gradient:	0.012	feet per foot
Deep Groundwater Gradient:	0.028	feet per foot

Site Geology:

The top of bedrock is located approximately 55 feet below grade throughout the Site. Surficial deposits at the Site generally consist of reddish-brown silt and clay with lesser amounts of brown fine/coarse grained sand and gray rounded gravel. Coarser material (particularly sand) is more abundant at depths of 0 to 6 feet below grade compared to deeper intervals. The relative permeability of the unconsolidated deposits above bedrock at the Site is considered low.

MPRS Effectiveness:

Approval was granted by the NYSDEC (via email correspondence dated July 29, 2010) to terminate system operation following the July 2010 operational period. This system operation has been terminated in accordance with this approval, although the remedial system remains in place.

The dissolved phase concentrations have been reduced across the Site based on laboratory analysis of groundwater samples from 17 monitoring wells, 12 of which are depicted on Figures 7 through 18. Wells RW-3 and MW-D9 are not depicted on a figure but have always been below detection limits.

The total volatile organic compound (VOC) vapor mass recovery rate steadily decreased since system start up to a steady state indicative of an asymptotic condition that was reached during the last quarter of 2008. During the investigation phase, the quantity of subsurface methylene chloride was estimated to be 171 pounds. (See, however, the related discussion in Section 3.1 of the pending *Methylene Chloride Area Operation Maintenance and Monitoring Final Engineering Report and Petition for Remedial Closeout* - Quantum Management Group, Inc., April

2010). As of August 2, 2010, an estimated total of 138.9 pounds of methylene chloride has been recovered since system startup.

Comments:

The seventeen monitoring wells were sampled in accordance with the ground water sampling procedures outlined in Section 4.3 of the Draft OM&M Plan and the addendum to the Draft OM&M Plan submitted in August 2007. Wells were sampled in order of the lowest historical methylene chloride concentration to the highest historical methylene chloride concentration. The pumps used to collect the samples were decontaminated between wells in accordance with the addendum to Section 1.5 of the Site Specific Health and Safety Plan presented as Attachment A to the OM&M Plan contained within the Draft Final Engineering Report.

Monitoring well MW-D6 had a methylene chloride concentration of 1.2 µg/L consistent with the below laboratory reporting limit (<5.0 µg/L) level reported last quarter. Monitoring well MW-D7 had a methylene chloride concentration of 1.7 µg/L, also consistent with the last quarter's concentration of 2.4 µg/L and below the typical laboratory reporting limit. Methylene chloride concentrations in groundwater collected from the other fifteen site-related monitoring wells were below detection limits.


Acetone was detected in MW-23I at a concentration consistent with typical laboratory reporting limits (<25 µg/L) and less than the NYSDEC standard of 50 µg/L. Acetone concentrations in groundwater collected from the remaining site-related monitoring wells were below detection limits.

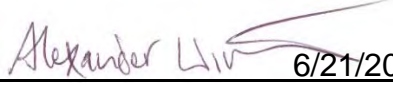
Attachments:

Table: Table 1 – Monitoring Well Gauging and Groundwater Analytical Data

Figures: Figure 1 – Area Map
Figure 2 – Site Plan
Figure 3 – Groundwater Contour and Concentration Map – Shallow Wells
Figure 4 – Groundwater Contour and Concentration Map – Intermediate Wells

Figure 5 – Groundwater Contour and
Concentration Map – Deep Wells
Figure 6 – Diagonal Well Potentiometric
Conversion
Figures 7-18 – Dissolved Phase Concentration
Trend Graphs (Concentrations less than the
laboratory reporting levels are depicted as “0”
µg/L.)


6/21/2011
Rose M. Weissman Date
Senior Project Manager


6/21/2011
Alexander Wirth Date
Senior Project Geologist

TABLE

**Table 1
MONITORING WELL GAUGING AND GROUNDWATER ANALYTICAL DATA**

UCB Facility
755 Jefferson Road
Rochester, New York
June 18, 2007 through March 8, 2011

Sample ID	Date	TOC Elevation	Depth to Water	Corrected Water Table Elevation	Acetone	Methyl Ethyl Ketone	Dichloro-difluoromethane	cis-1,2-Dichloroethene	Ethyl acetate	Isopropyl acetate	n-Amyl Acetate	Total Xylenes	Benzene	Chloroform	Chloromethane	1,1-Dichloroethylene	trans-1,2-Dichloroethene	Carbon Disulfide	Methylene chloride
NYSDEC Standards					50	50	5	5	~	~	~	5	1	7	5	5	5	50	5
MW-19	8/21/2003	NG	NG	NG	2.3 J	1.6 J	BRL	3.1	NA	NA	NA	BRL	0.69 J	BRL	BRL	NA	0.85 J	NA	BRL
	9/14/2005	NG	NG	NG	BRL	NA	NA	NA	NA	NA	NA	NA	BRL	NA	NA	NA	NA	NA	NA
MW-20A	8/13/2003	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	1,200,000
	9/20/2005	NG	NG	NG	38	NA	NA	NA	NA	NA	NA	NA	1 J	NA	NA	NA	NA	NA	150,000 D
MW-20B	8/13/2003	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	100,000
MW-21	8/12/2003	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	12
	9/8/2005	NG	NG	NG	BRL	NA	NA	NA	NA	NA	NA	NA	BRL	NA	NA	NA	NA	NA	BRL
MW-22	8/12/2003	NG	NG	NG	74	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	37
	9/15/2005	NG	NG	NG	BRL	NA	NA	NA	NA	NA	NA	NA	BRL	NA	NA	NA	NA	NA	BRL
MW-22E	9/4/2003	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	24
MW-23S	1/4/2011	547.77	5.18	542.59	15 J	<25	<5.0	<5.0	<5.0	<5.0	NA	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
	3/3/2011	547.77	4.89	542.88	5.0 U	5.0 U	1.0 U	1.0 U	2.0 U	2.0 U	2.0 U	2.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	10 U	1.0 U
MW-23I	1/4/2011	547.76	8.14	539.62	26	<25	<5.0	<5.0	<5.0	<5.0	NA	<10	<5.0	<5.0	<5.0	<5.0	<5.0	1.1 J	<5.0
	3/7/2011	547.76	7.07	540.69	28	5.0 U	1.0 U	1.0 U	2.0 U	2.0 U	2.0 U	2.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	10 U	1.0 U
MW-23D	1/4/2011	547.62	26.15	521.47	8.1 J	<25	<5.0	<5.0	<5.0	<5.0	NA	<10	<5.0	<5.0	<5.0	<5.0	<5.0	0.81 J	<5.0
	3/7/2011	547.62	25.34	522.28	5.0 U	5.0 U	1.0 U	1.0 U	2.0 U	2.0 U	2.0 U	2.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	10 U	1.0 U
EXSB-1	8/14/2003	NG	NG	NG	BRL	BRL	BRL	1.9	NA	NA	NA	BRL	BRL	BRL	BRL	NA	1.3	NA	11
	9/23/2005	NG	NG	NG	15 BJ	NA	NA	NA	NA	NA	NA	NA	BRL	NA	NA	NA	NA	NA	590 D
EXSB-1E	9/5/2003	NG	NG	NG	BRL	BRL	BRL	1.9	NA	NA	NA	BRL	BRL	BRL	BRL	NA	1.4	NA	4.6
EXSB-2	8/13/2003	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	1,900
	9/14/2005	NG	NG	NG	BRL	NA	NA	NA	NA	NA	NA	NA	0.4 J	NA	NA	NA	NA	NA	BRL
EXSB-2E	9/5/2003	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	6,600
MW-D1 (Gauge only)	5/12/1998	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL
	2/1/1999	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL
	4/29/1999	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL
	7/30/1999	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL
	11/0/18/99	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL
	1/28/2000	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL
	8/18/2003	NG	NG	NG	BRL	14	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL
	6/18/2007	544.32	22.55	521.77	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	9/19/2007	544.32	25.08	519.24	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	12/17/2007	544.32	23.40	520.92	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	3/14/2008	544.32	21.91	522.41	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	6/3/2008	544.32	22.64	521.68	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	9/9/2008	544.32	24.20	520.12	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	12/17/2008	544.32	23.60	520.72	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	3/23/2009	544.32	21.90	522.42	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	6/17/2009	544.32	22.88	521.44	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	9/15/2009	544.32	23.48	520.84	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
12/16/2009	544.32	23.25	521.07	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	
3/10/2010	544.32	22.46	521.86	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	
6/1/2010	544.32	22.63	521.69	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	
9/28/2010	544.32	NG	NG																Abandoned September 2010

**Table 1
MONITORING WELL GAUGING AND GROUNDWATER ANALYTICAL DATA**

UCB Facility
755 Jefferson Road
Rochester, New York
June 18, 2007 through March 8, 2011

Sample ID	Date	TOC Elevation	Depth to Water	Corrected Water Table Elevation	Acetone	Methyl Ethyl Ketone	Dichloro-difluoromethane	cis-1,2-Dichloroethene	Ethyl acetate	Isopropyl acetate	n-Amyl Acetate	Total Xylenes	Benzene	Chloroform	Chloromethane	1,1-Dichloroethylene	trans-1,2-Dichloroethene	Carbon Disulfide	Methylene chloride	
NYSDEC Standards					50	50	5	5	~	~	~	5	1	7	5	5	5	50	5	
MW-D2 (Gauge only)	5/12/1998	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL	
	2/1/1999	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL	
	4/29/1999	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL	
	7/30/1999	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL	
	10/18/1999	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL	
	1/28/2000	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL	
	8/19/2003	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL	
	6/18/2007	544.37	22.04	522.33	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	9/19/2007	544.37	24.42	519.95	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	12/17/2007	544.37	22.75	521.62	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	3/14/2008	544.37	21.23	523.14	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	6/3/2008	544.37	21.95	522.42	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	9/9/2008	544.37	25.53	518.84	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	12/17/2008	544.37	22.85	521.52	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	3/23/2009	544.37	21.19	523.18	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
6/17/2009	544.37	22.09	522.28	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	
9/15/2009	544.37	22.76	521.61	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	
12/16/2009	544.37	22.49	521.88	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	
3/10/2010	544.37	21.75	522.62	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	
6/1/2010	544.37	21.92	522.45	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	
9/28/2010	544.37	NG	NG	Abandoned September 2010																
MW-D3 (Gauge only)	5/12/1998	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	110	
	2/1/1999	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL	
	4/29/1999	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL	
	7/30/1999	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL	
	10/18/1999	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL	
	1/28/2000	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL	
	8/20/2003	NG	NG	NG	BRL	38	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL	
	6/18/2007	545.78	23.34	522.44	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NA	NS
	9/19/2007	545.78	25.08	520.70	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NA	NS
	12/17/2007	545.78	24.31	521.47	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NA	NS
	3/14/2008	545.78	22.79	522.99	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NA	NS
	6/3/2008	545.78	23.43	522.35	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NA	NS
	9/9/2008	545.78	24.90	520.88	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NA	NS
	12/17/2008	545.78	24.30	521.48	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	3/23/2009	545.78	22.71	523.07	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
6/17/2009	545.78	23.67	522.11	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	
9/15/2009	545.78	23.95	521.83	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	
12/16/2009	545.78	23.93	521.85	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	
3/10/2010	545.78	26.33	519.45	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	
6/1/2010	545.78	23.44	522.34	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	
9/28/2010	545.78	NG	NG	Abandoned September 2010																
MW-D4 (Gauge only)	7/30/1999	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL	
	10/18/1999	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL	
	1/28/2000	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL	
	8/21/2003	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL	
	6/18/2007	545.71	23.25	522.46	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NA	NS
	9/19/2007	545.71	25.76	519.95	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NA	NS
	12/17/2007	545.71	24.15	521.56	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NA	NS
	3/14/2008	545.71	22.31	523.40	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NA	NS
	6/3/2008	545.71	23.40	522.31	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NA	NS
	9/9/2008	545.71	24.93	520.78	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NA	NS
	12/17/2008	545.71	24.32	521.39	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	3/23/2009	545.71	22.63	523.08	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	6/17/2009	545.71	23.64	522.07	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	9/15/2009	545.71	41.39	504.32	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	12/16/2009	545.71	23.96	521.75	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
3/10/2010	545.71	23.20	522.51	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	
6/1/2010	545.71	23.54	522.17	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	
9/28/2010	545.71	NG	NG	Abandoned September 2010																

**Table 1
MONITORING WELL GAUGING AND GROUNDWATER ANALYTICAL DATA**

UCB Facility
755 Jefferson Road
Rochester, New York
June 18, 2007 through March 8, 2011

Sample ID	Date	TOC Elevation	Depth to Water	Corrected Water Table Elevation	Acetone	Methyl Ethyl Ketone	Dichloro-difluoromethane	cis-1,2-Dichloroethene	Ethyl acetate	Isopropyl acetate	n-Amyl Acetate	Total Xylenes	Benzene	Chloroform	Chloromethane	1,1-Dichloroethylene	trans-1,2-Dichloroethene	Carbon Disulfide	Methylene chloride
NYSDEC Standards					50	50	5	5	~	~	~	5	1	7	5	5	5	50	5
RW-1	6/21/1996	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	6,200
	10/14/1996	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	3,100
	11/15/1996	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	28	BRL	NA	BRL	NA	1,591,400
	3/24/97 ^a	NG	NG	NG	BRL	BRL	NA	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	32,000
	3/25/97 ^a	NG	NG	NG	BRL	BRL	NA	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	6,100
	4/4/97 ^a	NG	NG	NG	BRL	BRL	NA	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	2,600
	5/12/1998	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	14
	2/1/1999	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL
	4/29/1999	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL
	7/30/1999	NG	NG	NG	BRL	BRL	1	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	210
10/18/1999	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL	
1/28/2003	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	2,000	
8/26/2003	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	0.74 J	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL
RW-2 (Recovery well, gauge & sample)	7/30/1999	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	20,700
	10/18/1999	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	620
	1/28/2000	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	1,900
	9/9/2005	NG	NG	NG	4 J	NA	NA	NA	NA	NA	NA	NA	0.7 J	NA	NA	NA	NA	NA	4,401 BD
	2/23/2007	NG	NG	NG	BRL	BRL	NA	BRL	BRL	BRL	NA	BRL	BRL	BRL	BRL	NA	NA	NA	19.4
	6/19/2007	547.64	6.54	541.10	<25	<25	<5.0	<5.0	<5.0	<5.0	NA	<15	<5.0	<5.0	<5.0	<5.0	<5.0	NA	34
	9/20/2007	547.64	7.73	539.91	<25	<25	NA	<5.0	<5.0	<5.0	NA	<15	<5.0	<5.0	<5.0	NA	NA	NA	<5.0
	12/18/2007	547.64	2.42	545.22	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<15	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
	3/17/2008	547.64	3.21	544.43	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<15	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
	6/3/2008	547.64	5.80	541.84	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<15	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
	9/9/2008	547.64	6.10	541.54	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<15	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
	12/17/2008	547.64	4.95	542.69	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<15	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
	3/23/2009	547.64	5.10	542.54	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
	6/17/2009	547.64	3.89	543.75	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	2.8 J,B
	9/16/2009	547.64	5.05	542.59	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
	12/17/2009	547.64	4.65	542.99	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
3/10/2010	547.64	2.69	544.95	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	
6/1/2010	547.64	4.50	543.14	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	
9/28/2010	547.64	NG	NG	Abandoned September 2010															
RW-3 (Gauge and Sample)	8/15/2003	NG	NG	NG	BRL	BRL	BRL	1.4	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL
	9/14/2005	NG	NG	NG	4 J	NA	NA	NA	NA	NA	NA	NA	BRL	BRL	NA	NA	NA	NA	BRL
	2/21/2007	NG	NG	NG	BRL	BRL	NA	BRL	BRL	BRL	NA	BRL	BRL	BRL	BRL	NA	NA	NA	BRL
	6/20/2007	549.24	9.17	540.07	<25	<25	<5.0	<5.0	<5.0	<5.0	NA	<15	<5.0	<5.0	<5.0	<5.0	<5.0	NA	<5.0
	9/19/2007	549.24	11.52	537.72	<25	<25	NA	<5.0	<5.0	<5.0	NA	<15	<5.0	<5.0	<5.0	NA	NA	NA	<5.0
	12/18/2007	549.24	3.83	545.41	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<15	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
	3/18/2008	549.24	6.68	542.56	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<15	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
	6/4/2008	549.24	8.55	540.69	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<15	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
	9/10/2008	549.24	11.78	537.46	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<15	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
	12/17/2008	549.24	6.59	542.65	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	3/23/2009	549.24	6.48	542.76	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	6/17/2009	549.24	5.15	544.09	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	9/17/2009	549.24	6.81	542.43	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
	12/16/2009	549.24	5.02	544.22	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	3/10/2010	549.24	3.55	545.69	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
6/1/2010	549.24	5.53	543.71	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	
9/29/2010	549.24	4.89	544.35	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	
1/4/2011	549.24	4.30	544.94	<25	<25	<5.0	<5.0	<5.0	<5.0	NA	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	
3/4/2011	549.24	2.81	546.43	5.0 U	5.0 U	1.0 U	1.0 U	2.0 U	2.0 U	2.0 U	2.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	10 U	1.0 U	

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Sample ID	Date	TOC Elevation	Depth to Water	Corrected Water Table Elevation	Acetone	Methyl Ethyl Ketone	Dichloro-difluoromethane	cis-1,2-Dichloroethene	Ethyl acetate	Isopropyl acetate	n-Amyl Acetate	Total Xylenes	Benzene	Chloroform	Chloromethane	1,1-Dichloroethylene	trans-1,2-Dichloroethene	Carbon Disulfide	Methylene chloride	
NYSDEC Standards					50	50	5	5	~	~	~	5	1	7	5	5	5	50	5	
RW-4 (Recovery well, gauge & sample)	8/22/2003	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	270	
	9/9/2005	NG	NG	NG	10	NA	NA	NA	NA	NA	NA	NA	BRL	NA	NA	NA	NA	NA	79	
	2/23/2007	NG	NG	NG	BRL	BRL	NA	BRL	BRL	BRL	NA	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	
	6/19/2007	547.47	5.33	542.14	<25	<25	<5.0	<5.0	<5.0	<5.0	NA	<15	<5.0	<5.0	<5.0	<5.0	<5.0	NA	7,500 D	
	9/20/2007	547.47	8.77	538.70	<5,000	<5,000	NA	<1,000	<1,000	<1,000	NA	<3,000	<1,000	<1,000	<1,000	NA	NA	NA	18,000 D	
	12/18/2007	547.47	3.22	544.25	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<15	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	
	3/17/2008	547.47	3.30	544.17	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<15	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	
	6/4/2008	547.47	16.05	531.42	<3,100	<3,100	<620	<620	<620	<620	<620	<620	<1,900	<620	<620	<620	<620	<620	<620	8,400
	9/10/2008	547.47	30.20	517.27	<1,200	<1,200	<250	<250	<250	<250	<250	<250	<750	<250	<250	<250	<250	<250	<250	3,400
	12/17/2008	547.47	29.02	518.45	<5,000	<5,000	<1,000	<1,000	<1,000	<1,000	<1,000	<3,000	<1,000	<1,000	<1,000	<1,000	<1,000	<1,000	<1,000	13,000
	3/23/2009	547.47	29.21	518.26	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	0.95 J	10,000 D	
	6/17/2009	547.47	12.86	534.61	<50	<50	<10	<10	<10	<10	<10	<20	<10	<10	<10	<10	<10	<10	<10	78 D,B
	9/16/2009	547.47	29.66	517.81	<1,200	<1,200	<250	<250	<250	<250	<250	<500	<250	<250	<250	<250	<250	<250	<250	3,300
	12/18/2009	547.47	12.98	534.49	<100	<100	<20	<20	<20	<20	<20	<40	<20	<20	<20	<20	<20	<20	<20	240
	3/11/2010	547.47	3.42	544.05	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	1.7 J
6/1/2010	547.47	5.92	541.55	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	17	
9/28/2010	547.47	5.37	542.10	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	
1/4/2011	547.47	2.75	545.66	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	NA	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	
3/7/2011	547.47	2.05	546.02	5.0 U	5.0 U	1.0 U	1.0 U	2.0 U	2.0 U	2.0 U	2.0 U	2.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	10 U	1.0 U	
RW-5 (Recovery well, gauge & sample)	8/26/2003	NG	NG	NG	8.1	2.4 J	BRL	0.88 J	NA	NA	NA	BRL	BRL	BRL	0.54 J	NA	BRL	NA	120	
	9/12/2005	NG	NG	NG	BRL	NA	NA	NA	NA	NA	NA	NA	BRL	NA	NA	NA	NA	NA	NA	BRL
	2/23/2007	NG	NG	NG	BRL	BRL	NA	BRL	BRL	BRL	NA	BRL	BRL	BRL	BRL	NA	NA	NA	NA	BRL
	6/20/2007	547.27	22.66	524.61	<25	<25	<5.0	<5.0	<5.0	<5.0	NA	<15	<5.0	<5.0	5.3	<5.0	<5.0	NA	45,000 D	
	9/20/2007	547.27	28.97	518.30	<250	<250	NA	<50	<50	<50	NA	<150	<50	<50	<50	NA	NA	NA	1,000	
	12/18/2007	547.27	3.05	544.22	<250	<250	<50	<50	<50	<50	<50	<150	<50	<50	<50	<50	<50	<50	<50	770
	3/17/2008	547.27	14.13	537.28	320	<250	<50	<50	<50	<50	<50	<150	<50	<50	<50	<50	<50	<50	<50	530
	6/4/2008	547.27	46.08	514.69	<250	<250	<50	<50	<50	<50	<50	<150	<50	<50	<50	<50	<50	<50	<50	410
	9/10/2008	547.27	41.68	517.80	<12,000	<12,000	<2,500	<2,500	<2,500	<2,500	<2,500	<7,500	<2,500	<2,500	<2,500	<2,500	<2,500	<2,500	<2,500	25,000
	12/17/2008	547.27	9.99	540.21	<2,500	<2,500	<500	<500	<500	<500	<500	<1,500	<500	<500	<500	<500	<500	<500	<500	6,600
	3/23/2009	547.27	45.36	515.20	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	22 B
	6/17/2009	547.27	42.89	516.94	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<1.1	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	2.2 J,B
	9/17/2009	547.27	44.76	515.62	<120	<120	<25	<25	<25	<25	<25	<50	<25	<25	<25	<25	<25	<25	<25	630
	12/17/2009	547.27	13.25	537.90	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	40
	3/10/2010	547.27	4.50	544.09	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	1.4 J
6/1/2010	547.27	7.43	542.02	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	
9/28/2010	547.27	5.77	543.19	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	
1/4/2011	547.27	4.56	544.05	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	
3/7/2011	547.27	3.38	544.88	5.0 U	5.0 U	1.0 U	1.0 U	2.0 U	2.0 U	2.0 U	2.0 U	2.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	10 U	1.0 U	
23'	3/23/2009	547.27	45.36	515.20	<2500	<2500	<500	<500	<500	<500	<500	<1,000	<500	<500	<500	<500	<500	<500	<500	8,900 D
	6/17/2009	547.27	42.89	516.94	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	0.94 J,B
	9/17/2009	547.27	44.76	515.62	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	12/17/2009	547.27	13.25	537.90	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	32
	3/10/2010	547.27	4.50	544.09	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	1.5 J
	6/1/2010	547.27	7.43	542.02	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
	9/28/2010	547.27	5.77	543.19	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
	1/4/2011	547.27	4.56	544.05	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	NA	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
3/7/2011	547.27	3.38	544.88	5.0 U	5.0 U	1.0 U	1.0 U	2.0 U	2.0 U	2.0 U	2.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	10 U	1.0 U	

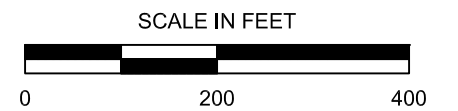
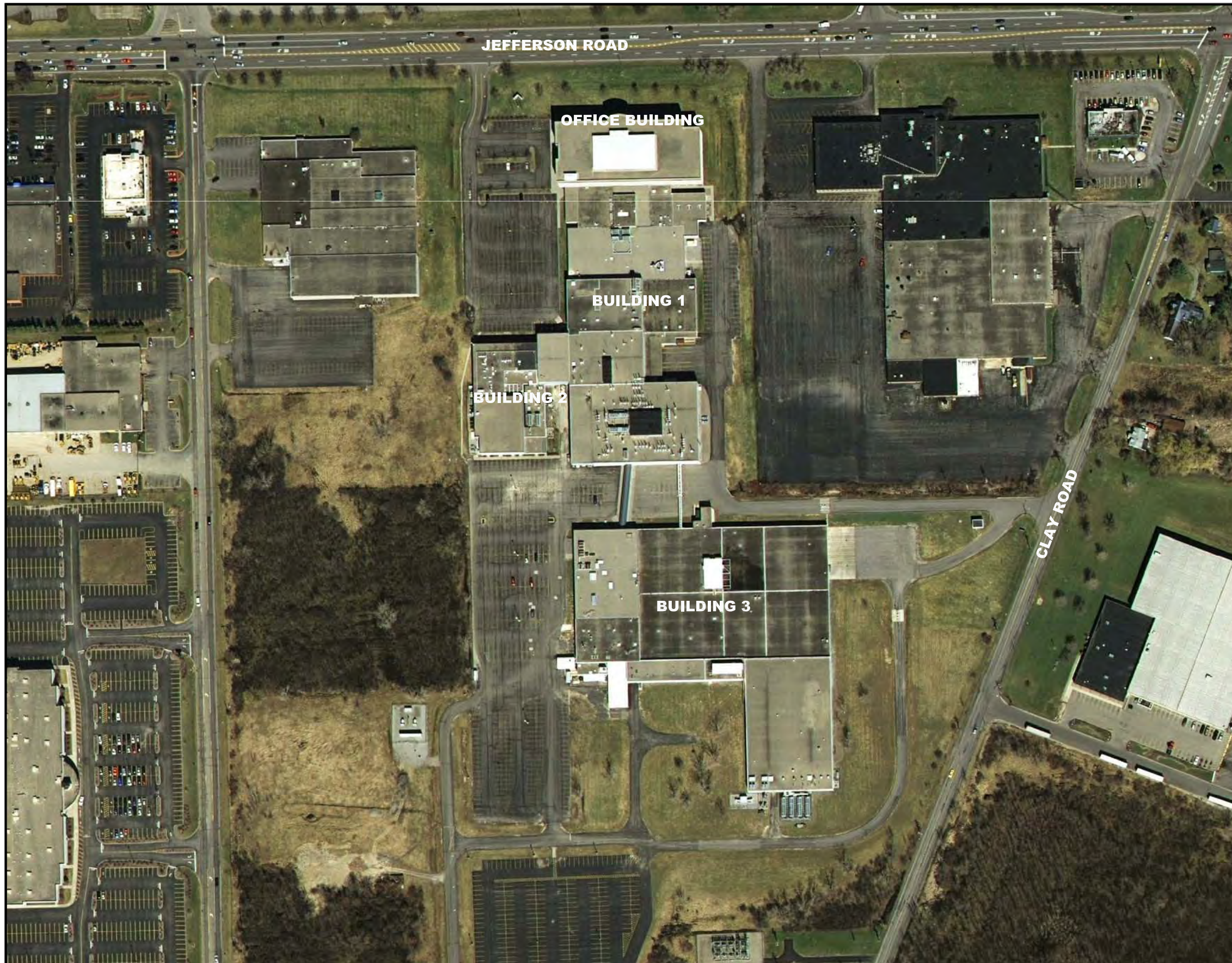
**Table 1
MONITORING WELL GAUGING AND GROUNDWATER ANALYTICAL DATA**

UCB Facility
755 Jefferson Road
Rochester, New York
June 18, 2007 through March 8, 2011

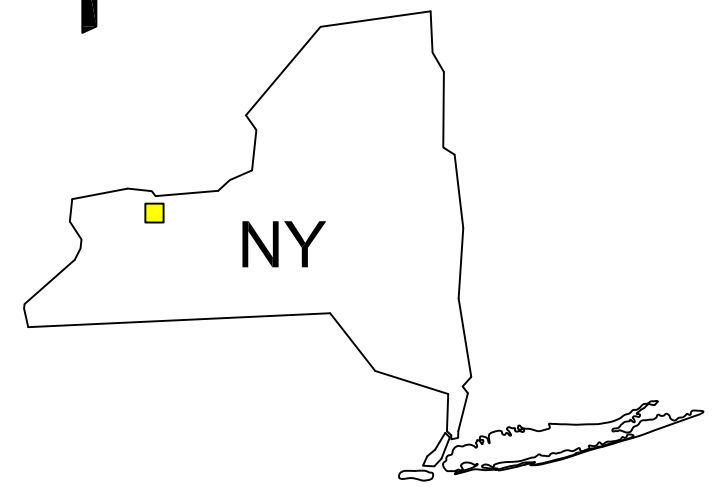
Sample ID	Date	TOC Elevation	Depth to Water	Corrected Water Table Elevation	Acetone	Methyl Ethyl Ketone	Dichloro-difluoromethane	cis-1,2-Dichloroethene	Ethyl acetate	Isopropyl acetate	n-Amyl Acetate	Total Xylenes	Benzene	Chloroform	Chloromethane	1,1-Dichloroethylene	trans-1,2-Dichloroethene	Carbon Disulfide	Methylene chloride	
NYSDEC Standards					50	50	5	5	~	~	~	5	1	7	5	5	5	50	5	
RW-6 (Recovery well, gauge & sample)	8/26/2003	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	140,000	
	9/9/2005	NG	NG	NG	5	NA	NA	NA	NA	NA	NA	NA	BRL	NA	NA	NA	NA	NA	3,300 D	
	2/22/2007	NG	NG	NG	BRL	BRL	NA	BRL	BRL	BRL	NA	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	
	6/20/2007	547.89	12.71	535.18	<25	<25	<5.0	<5.0	<5.0	<5.0	NA	<15	<5.0	<5.0	<5.0	<5.0	<5.0	NA	<5.0	
	9/20/2007	547.89	17.40	530.49	<25	<25	NA	<5.0	<5.0	<5.0	NA	<15	<5.0	<5.0	<5.0	NA	NA	NA	<5.0	
	12/19/2007	547.89	1.62	546.27	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<15	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
	3/18/2008	547.89	4.58	543.31	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<15	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
	6/4/2008	547.89	36.96	510.93	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<15	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
	9/11/2008	547.89	37.58	510.31	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<15	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
	12/17/2008	547.89	38.38	509.51	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	3/23/2009	547.89	7.91	539.98	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	6/17/2009	547.89	33.77	514.12	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	9/17/2009	547.89	9.91	537.98	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
	12/16/2009	547.89	11.76	536.13	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	3/10/2010	547.89	4.51	543.38	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
6/1/2010	547.89	6.70	541.19	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	
9/28/2010	547.89	5.89	542.00	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	
1/4/2011	547.89	4.34	544.02	<25	<25	<5.0	<5.0	<5.0	<5.0	NA	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	
3/4/2011	547.89	2.97	545.24	5.0 U	5.0 U	1.0 U	1.0 U	2.0 U	2.0 U	2.0 U	2.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	10 U	1.0 U		

Notes:
 <1.0 - Not detected at or above the laboratory reporting limit shown.
^a - Sample results are from a pumping test
 All units reported in µg/L - micrograms per liter (parts per billion)
 B - analyte found in the associated blank, as well as in the sample
Bolded - Detection above laboratory reporting limits
 BRL - Below laboratory reporting limits
 BTEX - benzene, toluene, ethylbenzene, and total xylenes.
 Corrected Water Table Elevation - Determined by trigonometry for wells MW-D9, MW-D11 to MW-D13, and RW-4 to RW-6
 D - Surrogate recovery unreportable due to dilution.
 DRY - Insufficient water to gauge or sample
 J - The reported concentration is estimated (the result is less than the sample quantitation limit but greater than zero)
 NA - not analyzed
 NG - not gauged/or data not available
 NS - not sampled
 NYSDEC Standards and Guidance Values - New York State Department of Environmental Conservation Technical and Operational Guidance Series (TOGS) 1.1.1, Ambient Water Quality Standards and Guidance Values, June 1998 and Addendum April 2000
 Shading - Reported concentration detected above the applicable standard(s) or guidance value(s)
 U - Analyte was analyzed for but not detected. The sample quantitation limit has been corrected for dilution and for percent moisture, unless otherwise noted in the case narrative.

FIGURES



LATITUDE: 43° 05' 03" N
 LONGITUDE: 77° 37' 19" W



SITE LOCATION

NEWBURGH, NY

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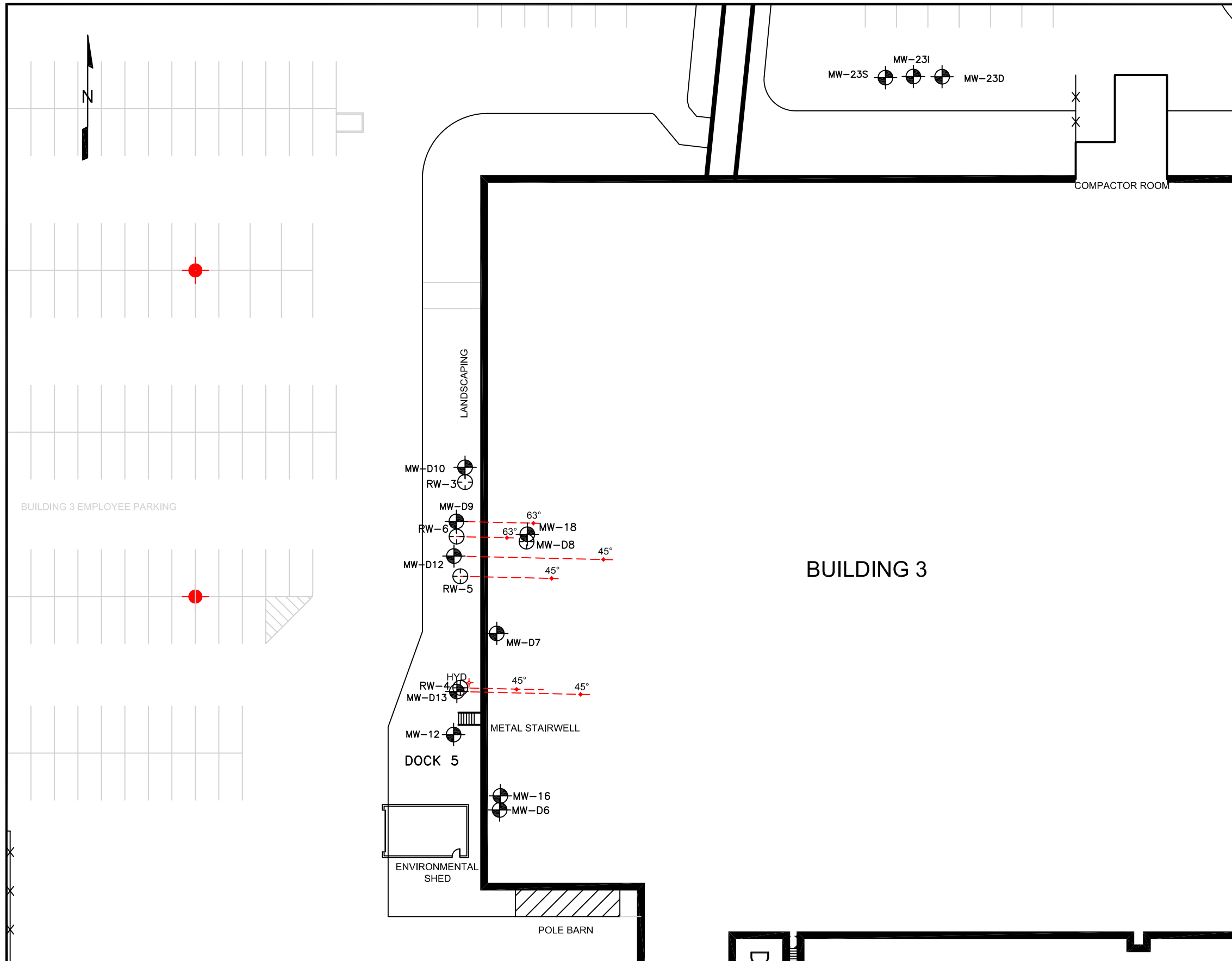
REFERENCES:

1. AERIAL IMAGES "w_14041124_12_09000_col_20051.sid" AND "w_14041126_12_09000_col_20051.sid" © NYS CLEARING HOUSE.
2. KLEINFELDER FIELD RESEARCH.



PROJECT NO.	105651
DRAWN:	01/19/10
DRAWN BY:	KAW
CHECKED BY:	TS
FILE NAME:	SANOFISSURJAN10.dwg

AREA MAP		FIGURE 1
UCB FACILITY NYSDEC VCP# V00126-8 755 JEFFERSON ROAD ROCHESTER		
MONROE COUNTY	NEW YORK	



LEGEND	
	MONITORING WELL
	RECOVERY WELL
	PIEZOMETER
	FIRE HYDRANT
	AREA LIGHT
	ANGLED WELL (ANGLE MEASURED FROM GROUND SURFACE)



NEWBURGH, NY

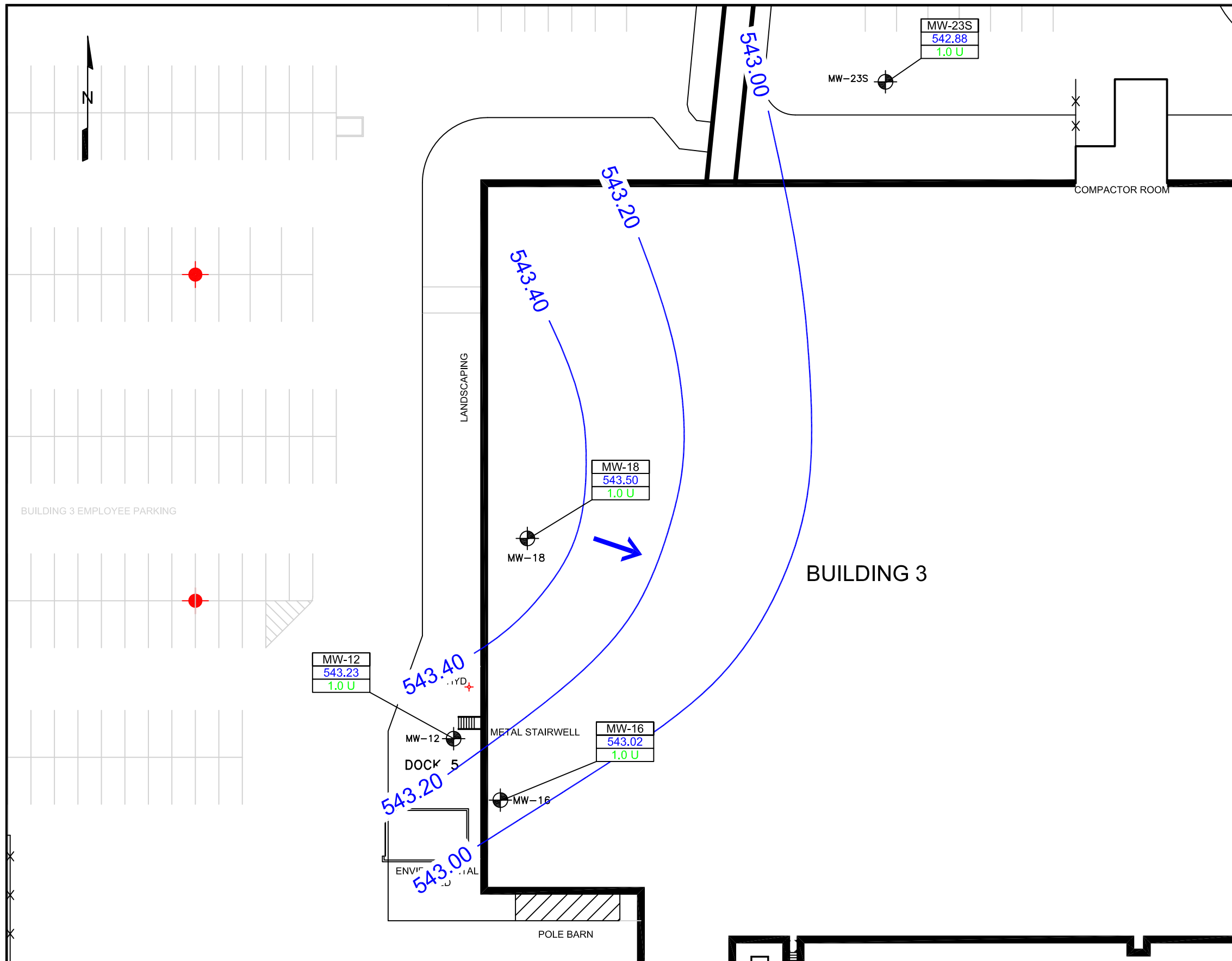
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- REFERENCES:
- "WELL LOCATION MAP" PREPARED BY ERM, DATED SEPTEMBER, 2006.
 - "MONITORING WELL SURVEY" PREPARED BY PARRON ENGINEERING.
 - "SITE PLAN UNDERGROUND UTILITIES OVERVIEW", REVISION DATE JANUARY 2007.
 - KLEINFELDER FIELD RESEARCH.

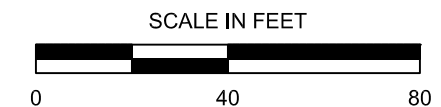


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DRAWN BY:	CTH
CHECKED BY:	AW
FILE NAME:	QEEMRMAY11.dwg

SITE PLAN		FIGURE 2
UCB FACILITY NYSDEC VCP# V00126-8 755 JEFFERSON ROAD ROCHESTER		
MONROE COUNTY	NEW YORK	



LEGEND				
	MONITORING WELL			
	RECOVERY WELL			
	PIEZOMETER			
	FIRE HYDRANT			
	AREA LIGHT			
<table border="1"><tr><td>MW-23S</td></tr><tr><td>542.88</td></tr><tr><td>1.0 U</td></tr></table>	MW-23S	542.88	1.0 U	MONITORING WELL IDENTIFICATION GROUNDWATER ELEVATION (FEET) METHYLENE CHLORIDE (µg/L)
MW-23S				
542.88				
1.0 U				
	APPARENT GROUNDWATER FLOW DIRECTION			
	WATER-TABLE CONTOUR (0.2 FOOT INTERVAL) (DASHED WHERE INFERRED)			
µg/L	MICROGRAMS PER LITER			
U	ANALYTE WAS ANALYZED FOR BUT NOT DETECTED			



- NOTES:
- GROUNDWATER MONITORING WELLS WERE GAUGED AND SAMPLED ON MARCH 3, 2011.
 - SYSTEM WAS NOT OPERATIONAL AT THE TIME OF GAUGING AND SAMPLING.

- REFERENCES:
- "WELL LOCATION MAP" PREPARED BY ERM, DATED SEPTEMBER, 2006.
 - "MONITORING WELL SURVEY" PREPARED BY PARRON ENGINEERING.
 - "SITE PLAN UNDERGROUND UTILITIES OVERVIEW", REVISION DATE JANUARY 2007.
 - KLEINFELDER FIELD RESEARCH.



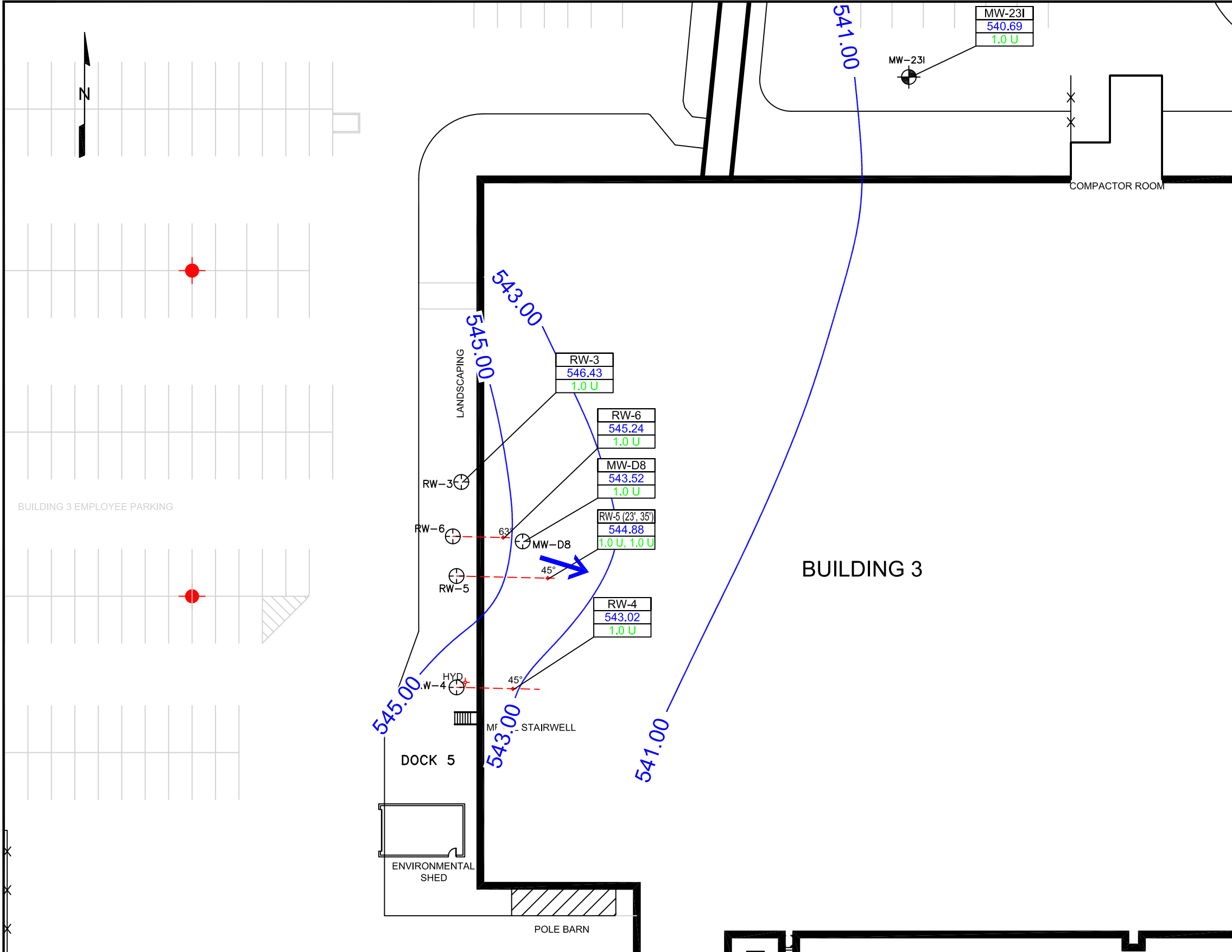
PROJECT NO.	109794
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FILE NAME:	QEEMRMAY11.dwg

GROUNDWATER CONTOUR AND CONCENTRATIONS MAP SHALLOW WELLS	
UCB FACILITY NYSDEC VCP# V00126-8 755 JEFFERSON ROAD ROCHESTER	
MONROE COUNTY	NEW YORK

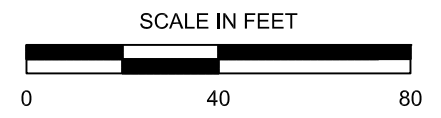
FIGURE
3

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LEGEND	
	MONITORING WELL
	RECOVERY WELL
	PIEZOMETER
	FIRE HYDRANT
	AREA LIGHT
	ANGLED WELL (ANGLE MEASURED FROM GROUND SURFACE)
	MONITORING WELL IDENTIFICATION GROUNDWATER ELEVATION (FEET) METHYLENE CHLORIDE (µg/L)
	APPARENT GROUNDWATER FLOW DIRECTION
	WATER-TABLE CONTOUR (2.5 FOOT INTERVAL) (DASHED WHERE INFERRED)
µg/L	MICROGRAMS PER LITER
U	ANALYTE WAS ANALYZED FOR BUT NOT DETECTED



- NOTES:
- GROUNDWATER MONITORING WELLS WERE GAUGED AND SAMPLED ON MARCH 3, 2011.
 - SYSTEM WAS NOT OPERATIONAL AT THE TIME OF GAUGING AND SAMPLING.

- REFERENCES:
- "WELL LOCATION MAP" PREPARED BY ERM, DATED SEPTEMBER, 2006.
 - "MONITORING WELL SURVEY" PREPARED BY PARRON ENGINEERING.
 - "SITE PLAN UNDERGROUND UTILITIES OVERVIEW", REVISION DATE JANUARY 2007.
 - KLEINFELDER FIELD RESEARCH.

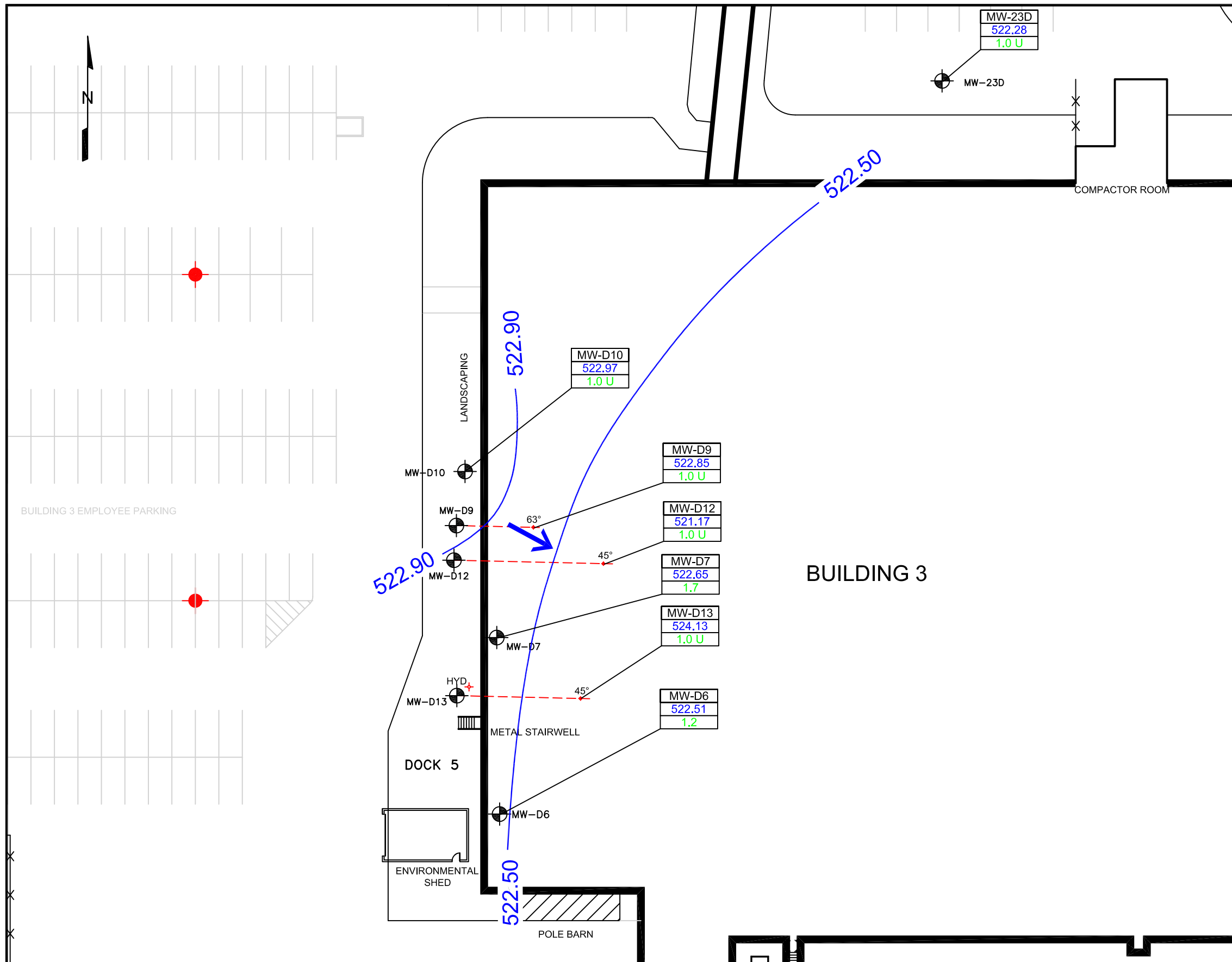
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DRAWN:	05/31/11
DRAWN BY:	CTH
CHECKED BY:	AW
FILE NAME:	QEEMRMAY11.dwg

GROUNDWATER CONTOUR AND CONCENTRATIONS MAP INTERMEDIATE WELLS		FIGURE
		4
MONROE COUNTY	UCB FACILITY NYSDEC VCP# V00126-8 755 JEFFERSON ROAD ROCHESTER	NEW YORK

NEWBURGH, NY

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LEGEND	
	MONITORING WELL
	RECOVERY WELL
	PIEZOMETER
	FIRE HYDRANT
	AREA LIGHT
	ANGLED WELL (ANGLE MEASURED FROM GROUND SURFACE)
	MONITORING WELL IDENTIFICATION GROUNDWATER ELEVATION (FEET) METHYLENE CHLORIDE (µg/L)
	APPARENT GROUNDWATER FLOW DIRECTION
	WATER-TABLE CONTOUR (0.5 FOOT INTERVAL) (DASHED WHERE INFERRED)
µg/L	MICROGRAMS PER LITER
U	ANALYTE WAS ANALYZED FOR BUT NOT DETECTED



NOTES:

- GROUNDWATER MONITORING WELLS WERE GAUGED AND SAMPLED ON MARCH 3, 2011.
- SYSTEM WAS NOT OPERATIONAL AT THE TIME OF GAUGING AND SAMPLING.
- MONITORING WELL MW-D13 WAS OMITTED FROM GROUNDWATER CONTOURING DUE TO ANOMOLOUS DATA

REFERENCES:

- "WELL LOCATION MAP" PREPARED BY ERM, DATED SEPTEMBER, 2006.
- "MONITORING WELL SURVEY" PREPARED BY PARRON ENGINEERING.
- "SITE PLAN UNDERGROUND UTILITIES OVERVIEW", REVISION DATE JANUARY 2007.
- KLEINFELDER FIELD RESEARCH.

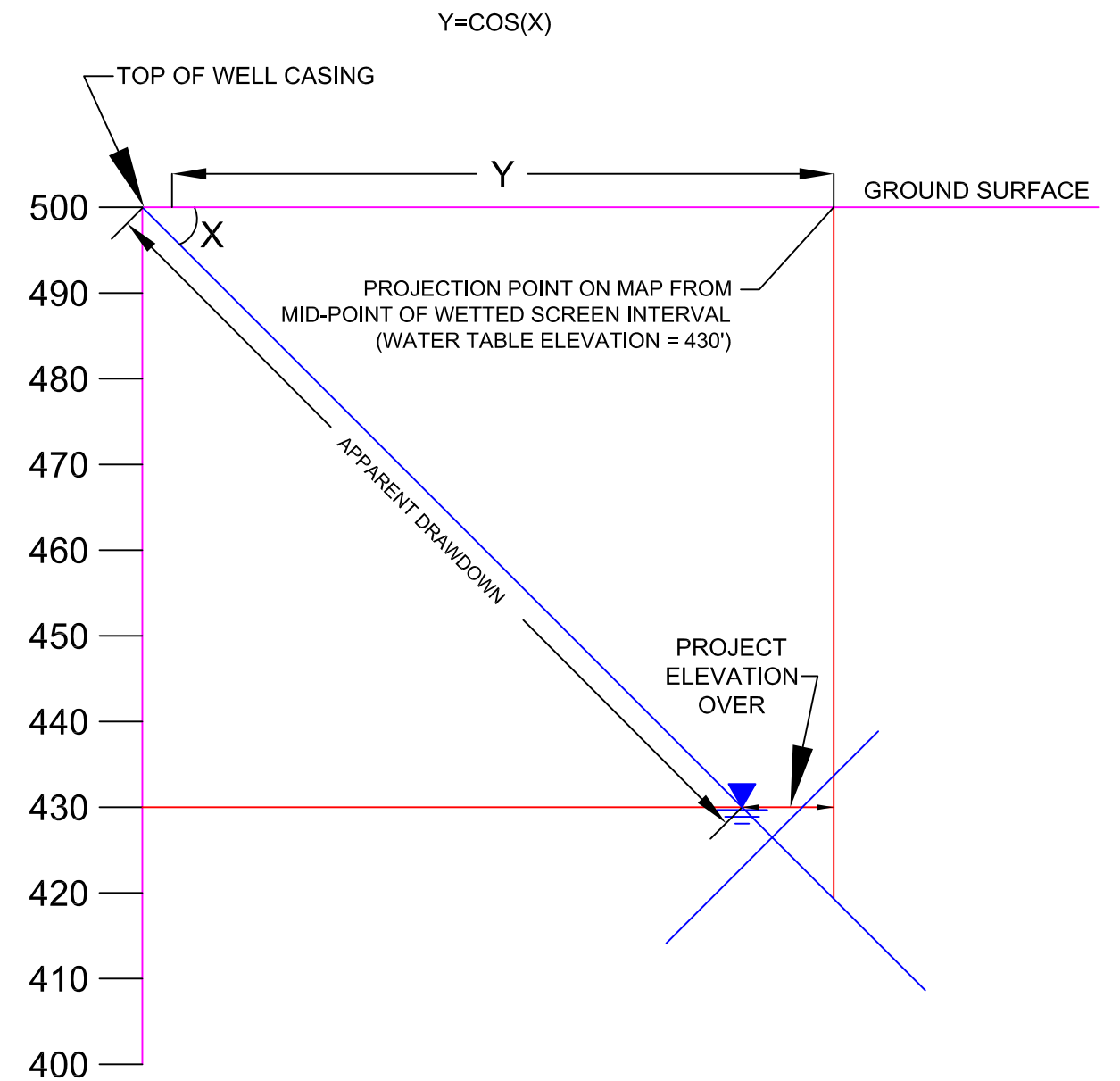
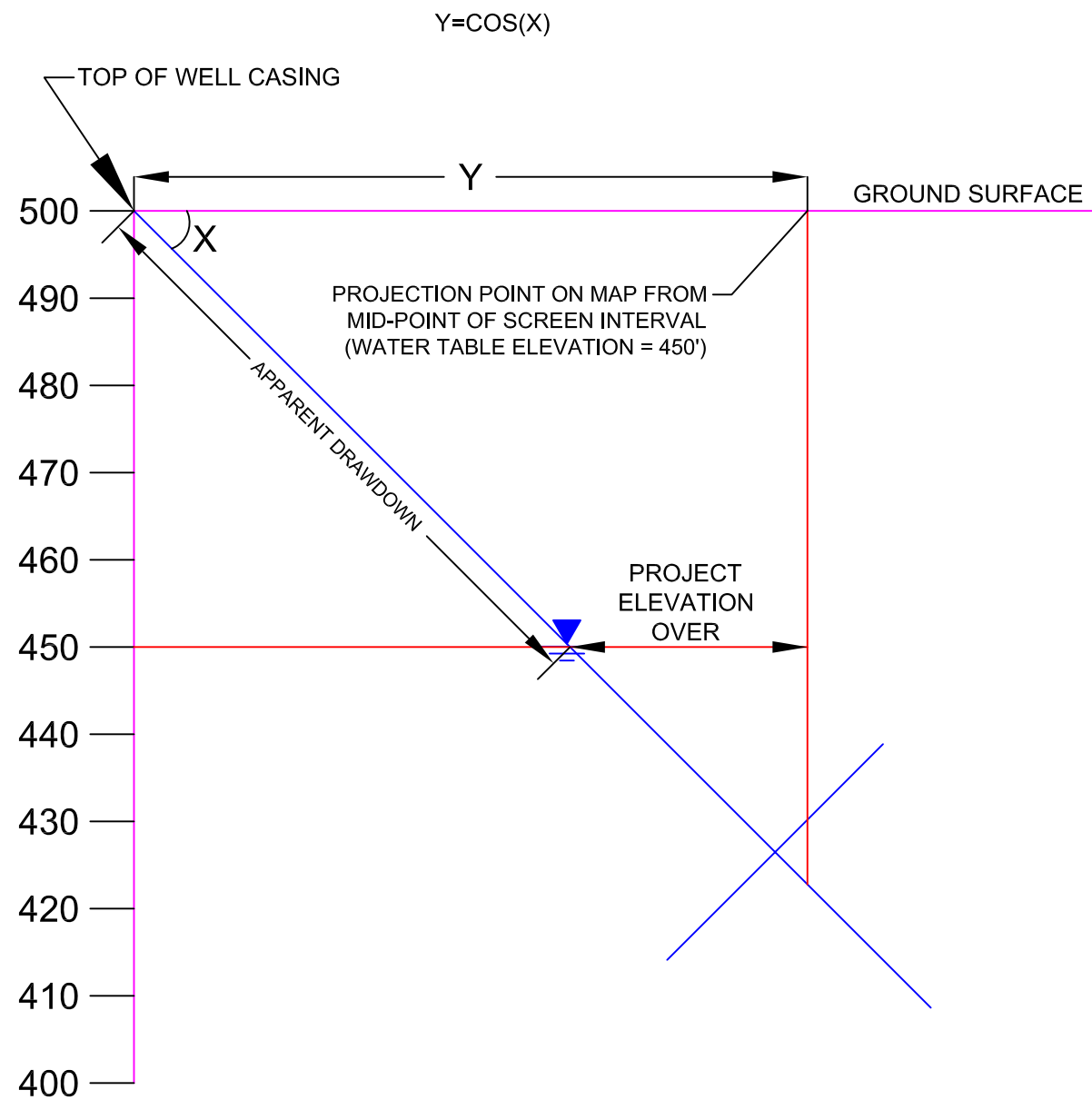


PROJECT NO.	109794
DRAWN:	05/31/11
DRAWN BY:	CTH
CHECKED BY:	AW
FILE NAME:	QEEMRMAY11.dwg

GROUNDWATER CONTOUR AND CONCENTRATIONS MAP DEEP WELLS		FIGURE 5
UCB FACILITY NYSDEC VCP# V00126-8 755 JEFFERSON ROAD ROCHESTER		
MONROE COUNTY	NEW YORK	

NEWBURGH, NY

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- REFERENCES:
1. "WELL LOCATION MAP" PREPARED BY ERM, DATED SEPTEMBER, 2006.
 2. "MONITORING WELL SURVEY" PREPARED BY PARRON ENGINEERING.
 3. "SITE PLAN UNDERGROUND UTILITIES OVERVIEW", REVISION DATE JANUARY 2007.
 4. KLEINFELDER FIELD RESEARCH.



PROJECT NO.	109794
DRAWN:	05/31/11
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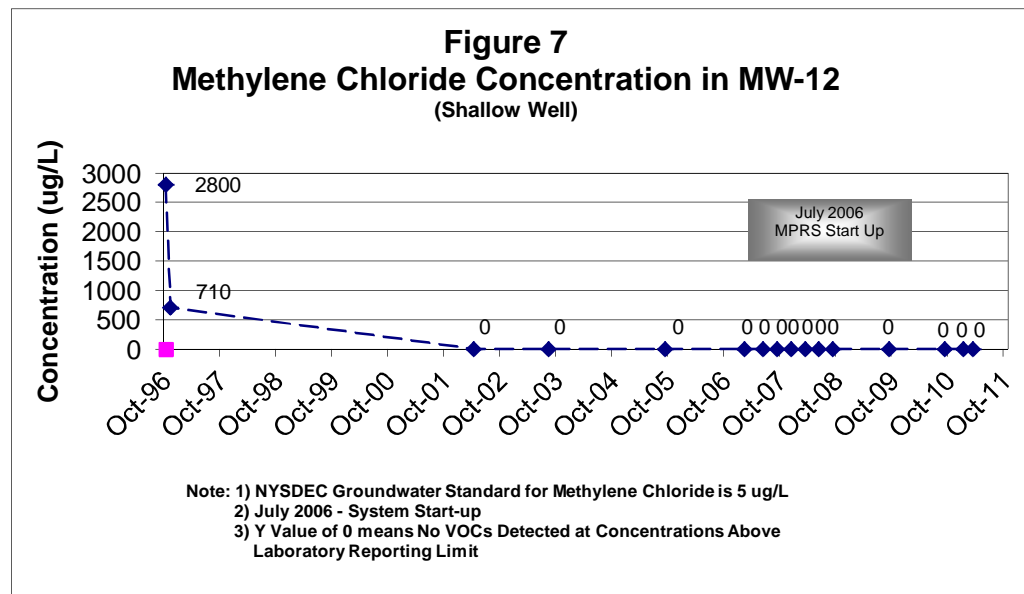
DIAGONAL WELL POTENTIOMETRIC CONVERSION		
UCB FACILITY NYSDEC VCP# V00126-8 755 JEFFERSON ROAD ROCHESTER		
MONROE COUNTY	ROCHESTER	NEW YORK

FIGURE
6

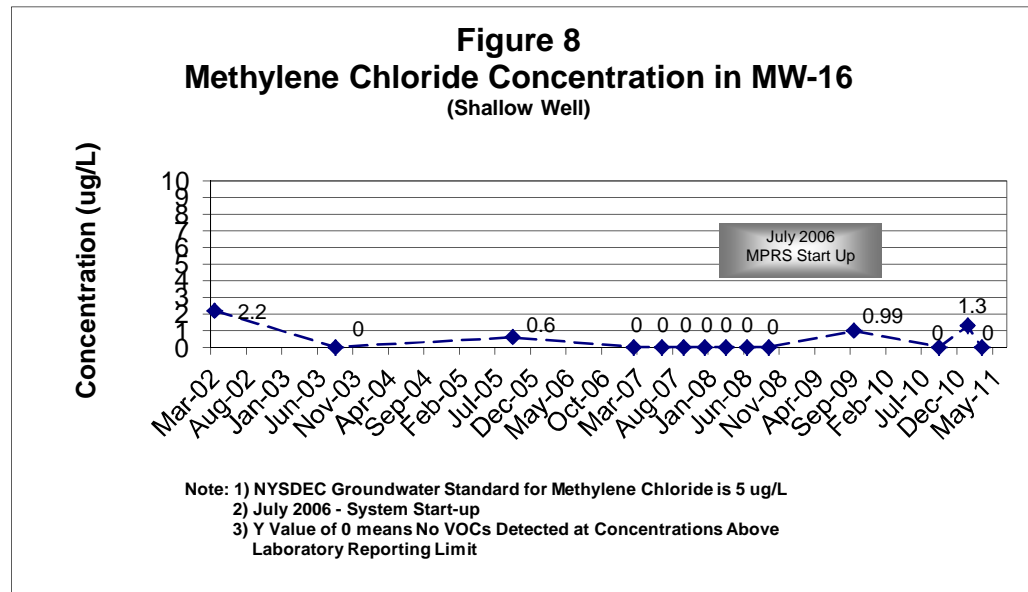
NEWBURGH, NY

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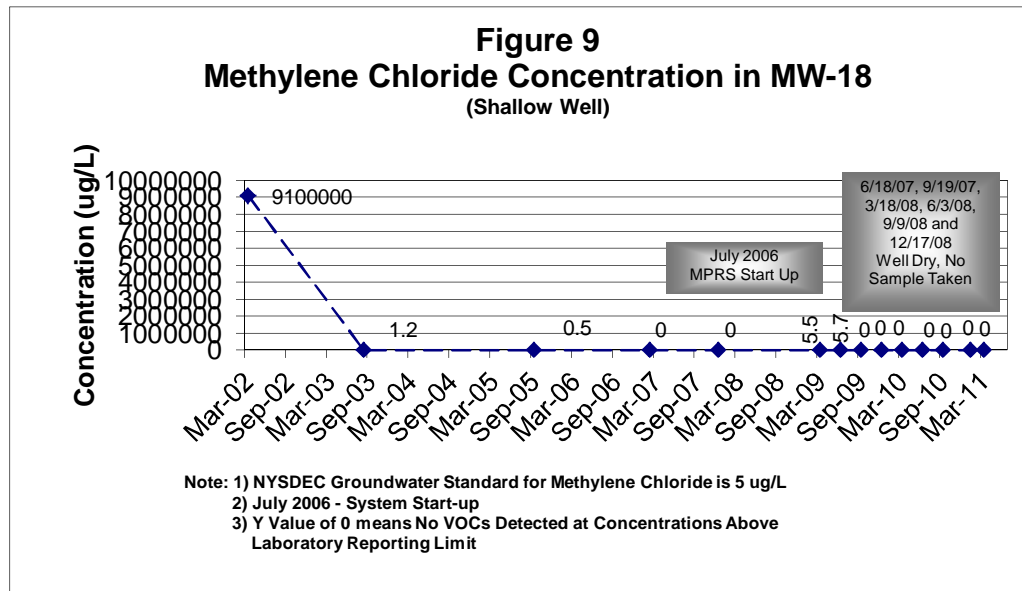
UCB Manufacturing Inc.
755 Jefferson Road Facility – Henrietta, New York
NYSDEC VCP Number: V00126-8



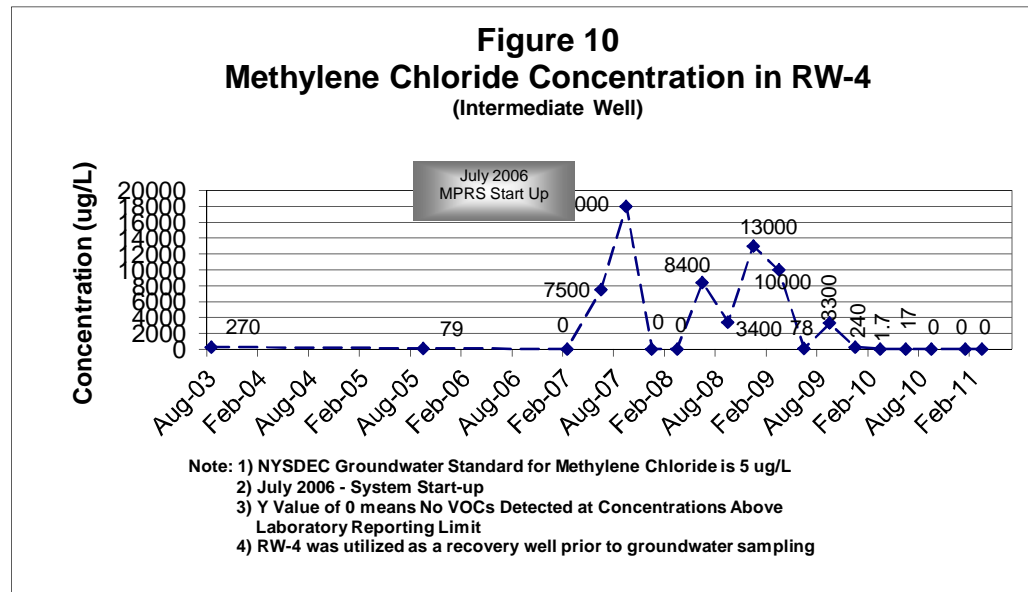
UCB Manufacturing Inc.
755 Jefferson Road Facility – Henrietta, New York
NYSDEC VCP Number: V00126-8



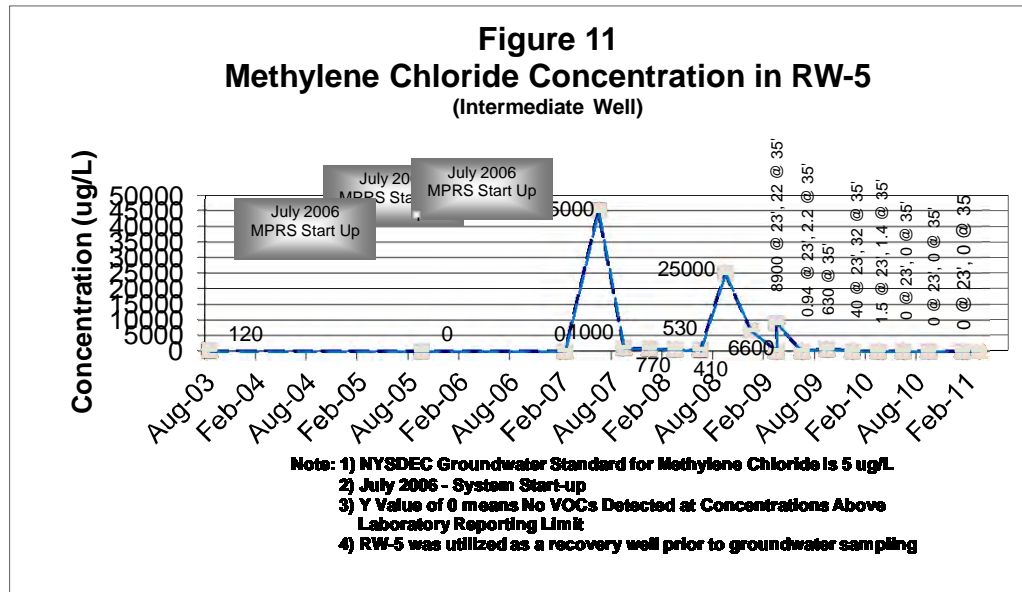
UCB Manufacturing Inc.
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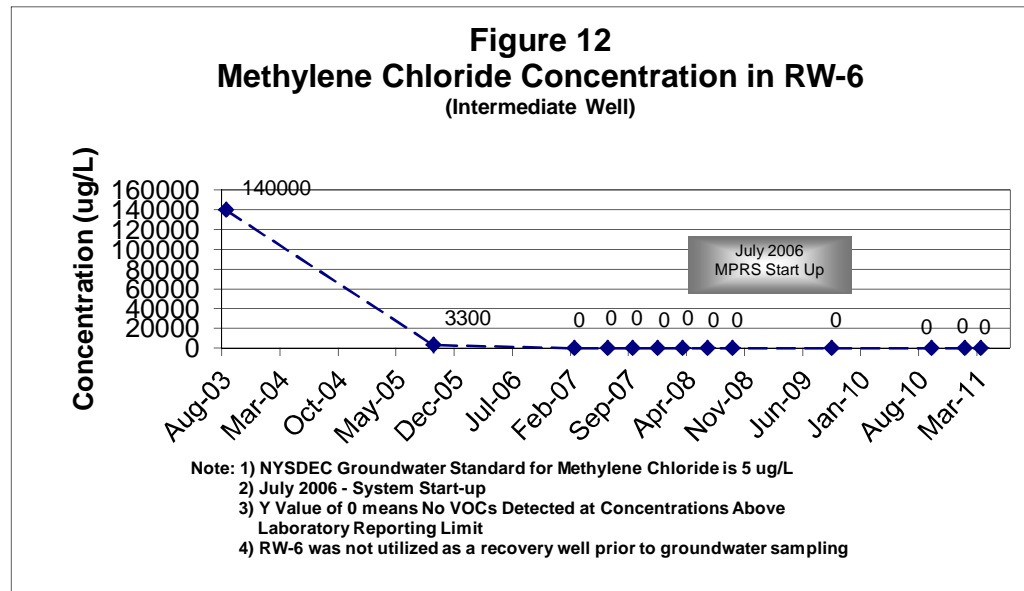
UCB Manufacturing Inc.
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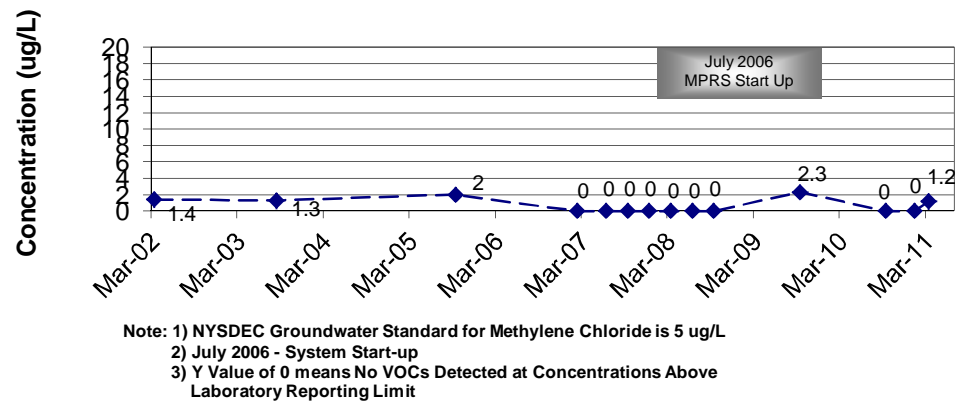


UCB Manufacturing Inc.
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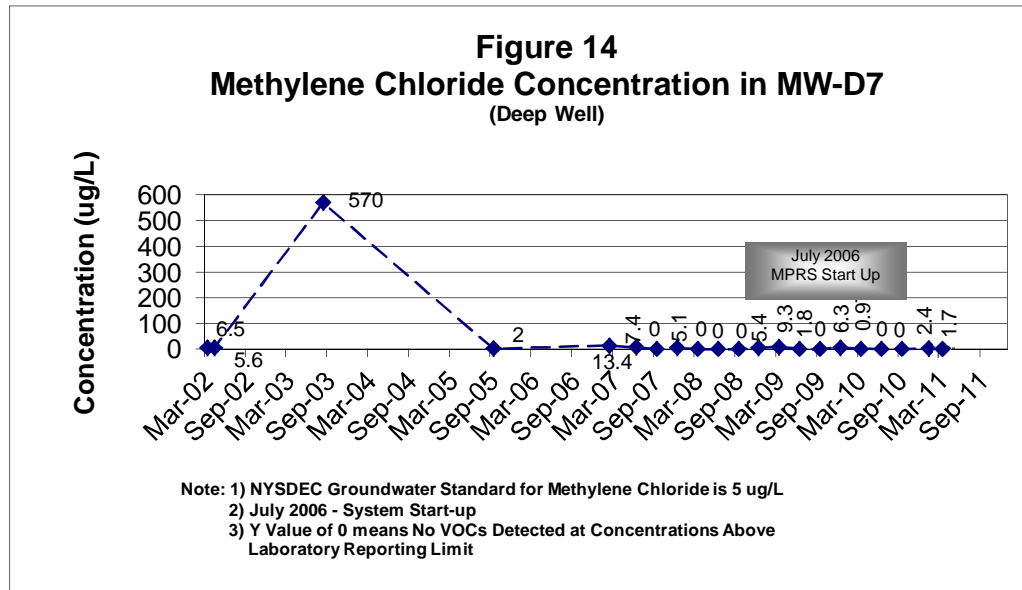


UCB Manufacturing Inc.
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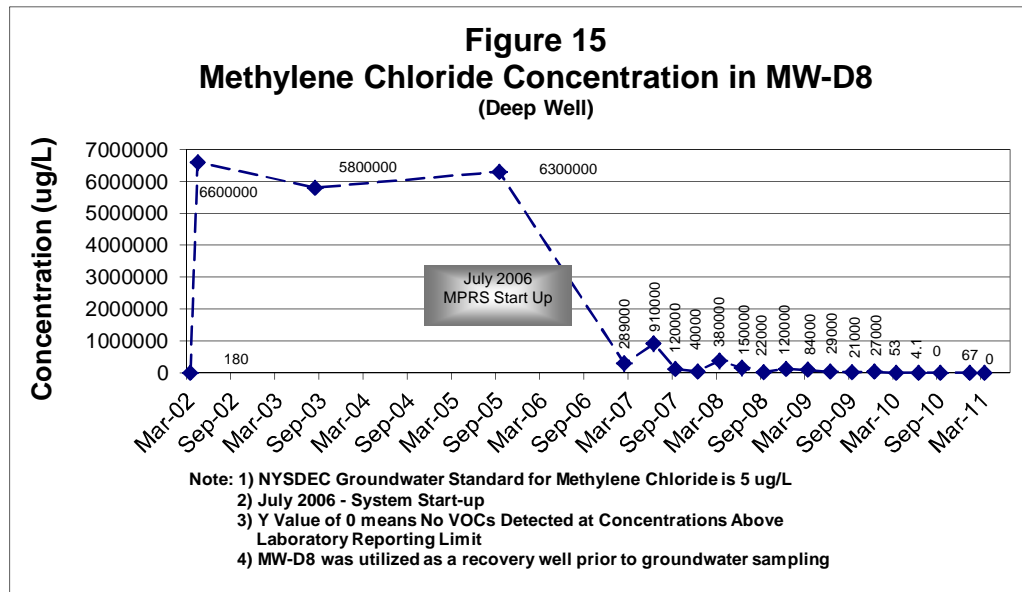
Figure 13
Methylene Chloride Concentration in MW-D6
(Deep Well)



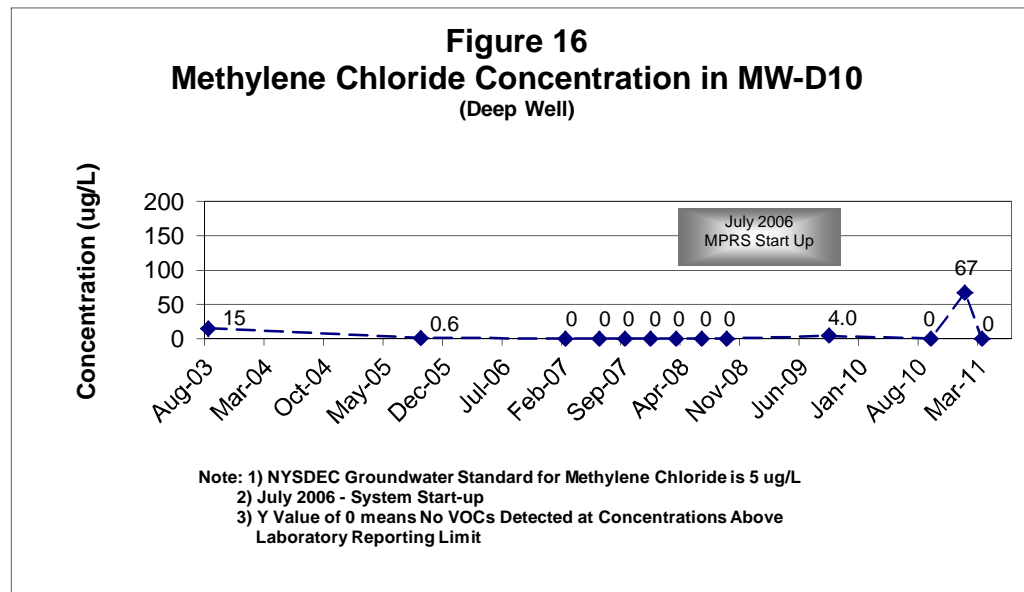
UCB Manufacturing Inc.
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UCB Manufacturing Inc.
755 Jefferson Road Facility – Henrietta, New York
NYSDEC VCP Number: V00126-8

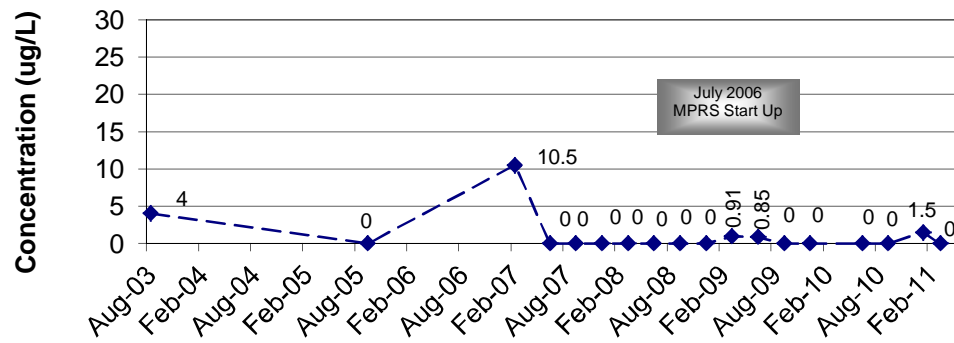


UCB Manufacturing Inc.
755 Jefferson Road Facility – Henrietta, New York
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UCB Manufacturing Inc.
755 Jefferson Road Facility – Henrietta, New York
NYSDEC VCP Number: V00126-8

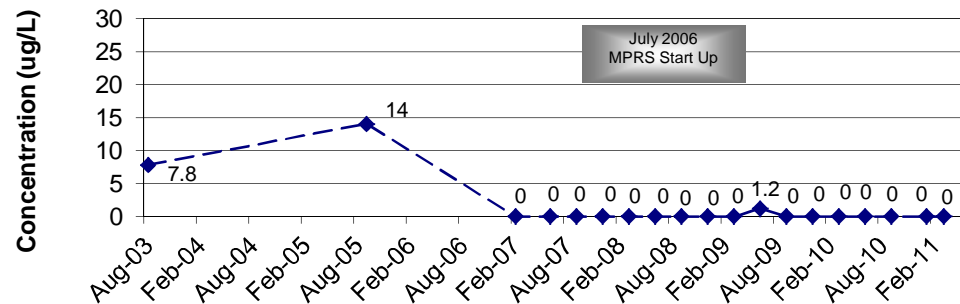
Figure 17
Methylene Chloride Concentration in MW-D12
(Deep Well)



Note: 1) NYSDEC Groundwater Standard for Methylene Chloride is 5 ug/L
2) July 2006 - System Start-up
3) Y Value of 0 means No VOCs Detected at Concentrations Above Laboratory Reporting Limit

UCB Manufacturing Inc.
755 Jefferson Road Facility – Henrietta, New York
NYSDEC VCP Number: V00126-8

Figure 18
Methylene Chloride Concentration in MW-D13
(Deep Well)



Note: 1) NYSDEC Groundwater Standard for Methylene Chloride is 5 ug/L
2) July 2006 - System Start-up
3) Y Value of 0 means No VOCs Detected at Concentrations Above Laboratory Reporting Limit



December 1, 2010

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: Third Quarter 2010 Environmental Effectiveness Monitoring Report
UCB Manufacturing Inc.
755 Jefferson Road Facility – Henrietta, New York
NYSDEC VCP Number: V00126-8

Dear Mr. MacLean:

On behalf of UCB Manufacturing Inc. (UCB), please find enclosed the Quarterly Environmental Effectiveness Monitoring Report for the above-referenced Site for the third quarter of 2010 covering the time period from July 1, 2010 through September 30, 2010. This report is being submitted in accordance with the requirements described in Section 6.2 of the draft Operation, Maintenance & Monitoring (OM&M) Plan.

Approval was granted by the New York State Department of Environmental Conservation (NYSDEC), (via email correspondence dated July 29, 2010), to terminate system operation following the July operational period, and the operation was terminated. Accordingly, only the July 2010 monthly report is included with this quarterly report (Appendix A).

On September 28 and 29, 2010, Kleinfelder East, Inc. (Kleinfelder) completed quarterly liquid gauging and groundwater sampling at the Site pursuant to Section 4.3 of the draft OM&M Plan and the addendum to the OM&M Plan submitted in August 2007.

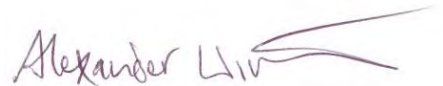
Groundwater quality analytical results are summarized on Table 1. As agreed to by NYSDEC at our meeting on November 18, this quarterly monitoring serves as the first round of post-closure monitoring. As discussed below, groundwater from all the wells sampled during this event met the Site-specific Remedial Objective, which are the State's groundwater standards (as specified in 6 NYCRR Part 703). If you require additional information or clarification, please contact the undersigned at (845) 567-6530 or Rick Bethel of Quantum Management Group, Inc. at (513) 314-7543.

Sincerely,

Kleinfelder East, Inc.



Rose M. Weissman
Senior Project Manager



Alexander Wirth
Senior Project Geologist

Enclosure

Cc: Rick Bethel – Quantum Management Group, Inc.
John Lang – Quantum Management Group, Inc.
Michael Bogdan – Sanofi Aventis
Richard Ricci – Lowenstein Sandler PC
Jean McCreary – Nixon Peabody
Libby Ford – Nixon Peabody

755 Jefferson Road Site, Henrietta, NY
QUARTERLY ENVIRONMENTAL EFFECTIVENESS MONITORING REPORT

Site Address: Jefferson Road Facility	Regulatory Agency: NYSDEC – Region 8
755 Jefferson Road Henrietta, New York	Regulatory Contact: Gregory B. MacLean, P.E.
NYSDEC VCP No.: V00126-8	Consultant: Quantum Management Inc. (QMG), Kleinfelder East, Inc.
UCB Contact: Greg Light	Project Manager / Senior Project Geologist: Rick Bethel (QMG), Alexander Wirth (KLF)

Report Date: December 1, 2010.

Current Site Status: Active pharmaceutical manufacturing facility.

Monitoring Period: Third quarter 2010 (July 1 through September 30).

Work Performed: Quarterly environmental effectiveness monitoring pursuant to Section 4.3 of the draft Operation, Maintenance & Monitoring (OM&M) plan submitted to New York State Department of Environmental Conservation (NYSDEC) in May 2007 and the addendum to the OM&M Plan submitted in August 2007. As agreed to by NYSDEC at our meeting on November 18, this quarterly monitoring serves as the first round of post-closure monitoring. The post-closure monitoring plan is included in Section 3 of the pending Site Management Plan which was submitted to NYSDEC in April 2010.

Gauged 14 monitoring wells and collected groundwater samples from 14 monitoring wells on September 28 and September 29, 2010.

A total of 25 wells were decommissioned and abandoned in August and September 2010 (Figure 2).

Groundwater Monitoring:

Number of Wells: 14
Gauging Frequency: Quarterly
Sampling Frequency: Quarterly (7 wells 1st, 2nd & 4th quarter / 14 wells 3rd quarter)

Overburden Groundwater
Depth: 1.57 feet to 43.05 feet

Shallow Groundwater Flow: Southeast
Intermediate Groundwater Flow: East
Deep Groundwater Flow: East

Shallow Groundwater Gradient: 0.01 feet per foot
Intermediate Groundwater Gradient: 0.11 feet per foot
Deep Groundwater Gradient: 0.06 feet per foot

Site Geology:

The top of bedrock is located approximately 55 feet below grade throughout the Site. Surficial deposits at the Site generally consist of reddish-brown silt and clay with lesser amounts of brown fine/coarse grained sand and gray rounded gravel. Coarser material (particularly sand) is more abundant at depths of 0 to 6 feet below grade compared to deeper intervals. The relative permeability of the unconsolidated deposits above bedrock at the Site is considered low.

MPRS Effectiveness:

Approval was granted by the NYSDEC (via email correspondence dated July 29, 2010) to terminate system operation following the July operational period. This system operation has been terminated in accordance with this approval, although the remedial system remains in place.

Until its operation was terminated, the Multi Phase Remedial System (MPRS) continued to attempt recovery of residual methylene chloride from areas of impacted soil and groundwater during the July operational period.

Since March 12, 2009 only three wells (MW-D8, RW-5 and RW-4) have been used as recovery wells as methylene chloride concentrations were highest in these wells based on previous sampling results. As discussed below, each of the three recovery wells RW-4 (intermediate depth), RW-5 (intermediate depth) and MW-D8 (intermediate depth) exhibited a decrease in methylene chloride concentrations compared to previous quarterly sampling results.

The dissolved phase concentrations have been reduced across the Site based on chemistry of groundwater from 14 monitoring wells, 12 of which are depicted on Figures 7 through 18. Wells RW-3 and MW-D9 have always been below detection limits and are not depicted on a figure.

The total volatile organic compound (VOC) vapor mass recovery rate steadily decreased since system start up to a steady state indicative of an asymptotic condition that was reached during the last quarter of 2008. During the investigation phase, the quantity of subsurface methylene chloride was estimated to be 171 pounds. (See, however, the related discussion in Section 3.1 of the pending *Methylene Chloride Area Operation Maintenance and Monitoring Final Engineering Report and Petition for Remedial Closeout* (Quantum Management Group, Inc., April 2010). As of August 2, 2010, an estimated total of 138.9 pounds of methylene chloride has been recovered since system startup. For the period from

July 1, 2010 to August 2, 2010, the system recovered an estimated total of 0.073 pounds of methylene chloride. The system operated for a total of 170 hours during this quarter. The average calculated recovery rate of methylene chloride over this quarter is 0.0004 pounds per hour.

Comments:

The wells were sampled in accordance with the ground water sampling procedures outlined in Section 4.3 of the Draft OM&M Plan and the addendum to the Draft OM&M Plan submitted in August 2007. Wells were sampled in order of the lowest historical methylene chloride concentration to the highest historical methylene chloride concentration. The pumps were decontaminated between wells in accordance with the addendum to Section 1.5 of the Site Specific Health and Safety Plan presented as Attachment A to the OM&M Plan contained within the Draft Final Engineering Report.

Recovery well RW-4 had a concentration below the laboratory reporting limit (<5.0 µg/L) this quarter as compared to 17 µg/L last quarter. Recovery well MW-D8 had a concentration below the laboratory reporting limit (<5.0 µg/L) this quarter as compared to 4.1J µg/L last quarter; this result is the lowest concentration to date, and below the established site clean-up level. Recovery well RW-5's concentrations remained below the laboratory reporting limit (<5.0 µg/L) this quarter at both the 23' and 35' interval. Methylene chloride concentrations in groundwater collected from the other site-related monitoring wells are within or lower than historical levels and below detection limits. Thus groundwater from all the wells sampled during this event met the Site-specific Remedial Objective, which are the State's groundwater standards (as specified in 6 NYCRR Part 703).

As previously stated, approval was granted by the NYSDEC to terminate system operation in an email correspondence dated July 29, 2010. This system operation has been terminated in accordance with this approval, although the remedial system remains in place.

The monitoring wells within the parking lot area were abandoned beginning on August 17, 2010 and completed on September 7, 2010. A total of 25 monitoring wells were abandoned as shown on Figure 2.

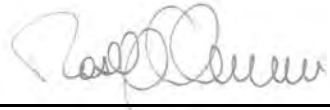
Based upon a meeting with NYSDEC on November 18, 2010, a work plan detailing sentinel well and soil boring locations is being prepared and will be submitted under separate cover.

Attachments:

Table: Table 1 – Monitoring Well Gauging and Groundwater Analytical Data

Figures: Figure 1 – Area Map
Figure 2 – Site Plan with Abandoned Well Locations
Figure 3 – Groundwater Contour and Concentration Map – Shallow Wells
Figure 4 – Groundwater Contour and Concentration Map – Intermediate Wells
Figure 5 – Groundwater Contour and Concentration Map – Deep Wells
Figure 6 – Diagonal Well Potentiometric Conversion
Figures 7-18 – Dissolved Phase Concentration Trend Graphs (Concentrations less than the laboratory reporting levels are depicted as “0” µg/L.)

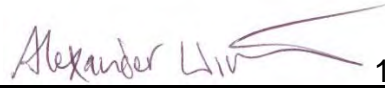
Appendices: Appendix A – Monthly Progress Report –
July 2010



12/1/10

Rose M. Weissman
Senior Project Manager

Date



12/1/10

Alexander Wirth
Senior Project Geologist

Date

TABLE

Table 1
MONITORING WELL GAUGING AND GROUNDWATER ANALYTICAL DATA

UCB Facility
755 Jefferson Road
Rochester, New York
June 18, 2007 through September 28 29, 2010

Table with 22 columns: Sample ID, Date, TOC Elevation, Depth to Water, Corrected Water Table Elevation, Acetone, Methyl Ethyl Ketone, Dichlorodifluoromethane, cis-1,2-Dichloroethene, Ethyl acetate, Isopropyl acetate, n-Amyl Acetate, Total Xylenes, Benzene, Chloroform, Chloromethane, 1,1-Dichloroethylene, trans-1,2-Dichloroethene, Carbon Disulfide, Methylene chloride. Rows are grouped by MW-11, MW-12, MW-14, and MW-15, with various dates and TOC values.

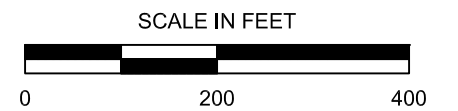
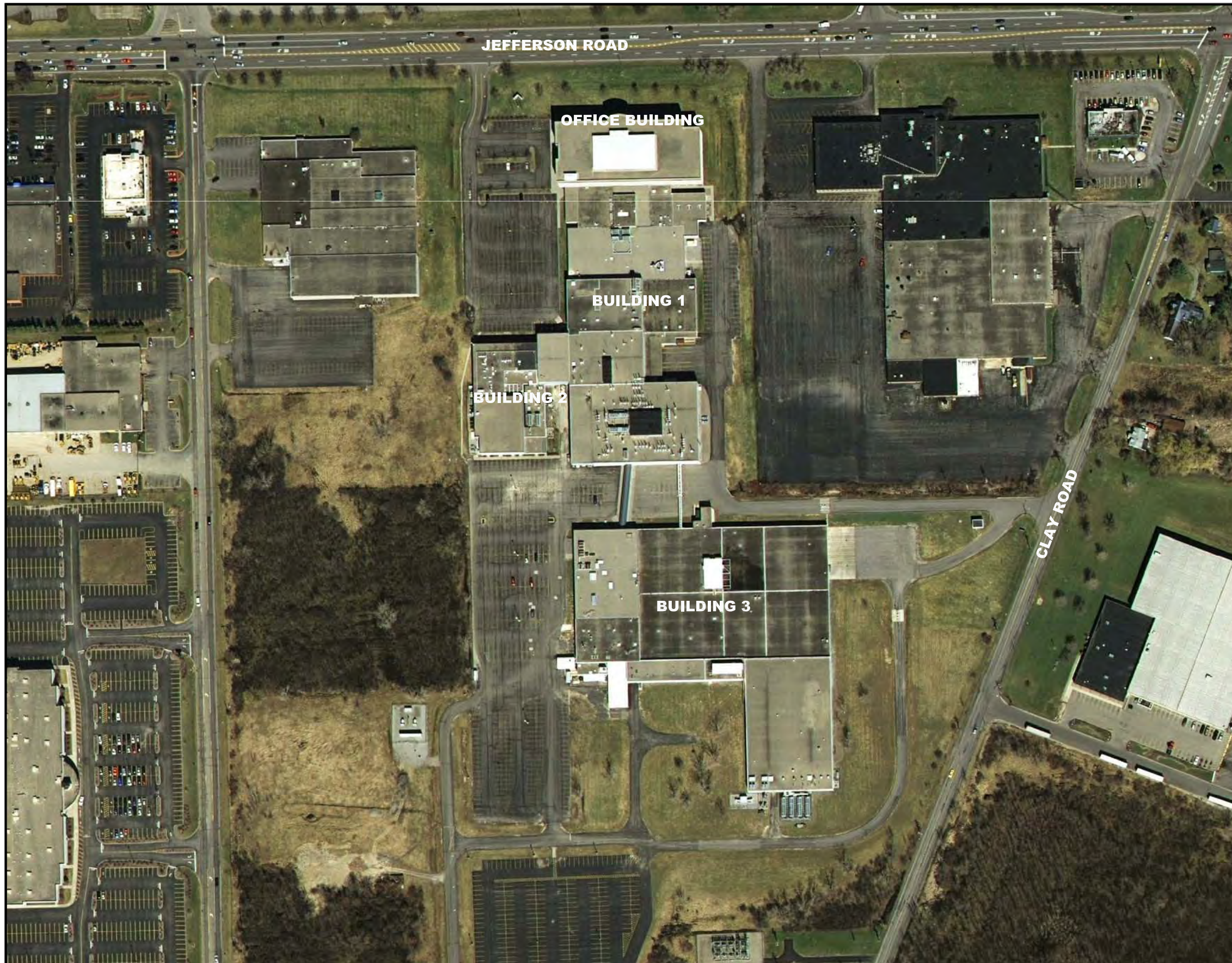
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MONITORING WELL GAUGING AND GROUNDWATER ANALYTICAL DATA

UCB Facility
755 Jefferson Road
Rochester, New York
June 18, 2007 through September 28 29, 2010

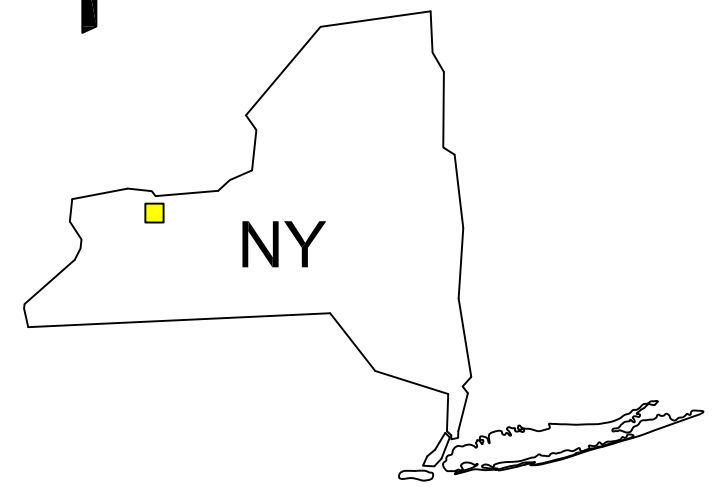
Sample ID	Date	TOC Elevation	Depth to Water	Corrected Water Table Elevation	Acetone	Methyl Ethyl Ketone	Dichloro- difluoromethane	cis-1,2- Dichloroethene	Ethyl acetate	Isopropyl acetate	n-Amyl Acetate	Total Xylenes	Benzene	Chloroform	Chloromethane	1,1- Dichloroethylene	trans-1,2- Dichloroethene	Carbon Disulfide	Methylene chloride
NYSDEC Standards					50	50	5	5	-	-	-	5	1	7	5	5	5	50	5
RW-5 (Recovery well, gauge & sample)	8/26/2003	NG	NG	NG	8.1	2.4 J	BRL	0.88 J	NA	NA	NA	BRL	BRL	BRL	0.54 J	NA	BRL	NA	120
	9/12/2005	NG	NG	NG	BRL	NA	NA	NA	NA	NA	NA	BRL	BRL	NA	NA	NA	NA	NA	BRL
	2/23/2007	NG	NG	NG	BRL	BRL	NA	BRL	BRL	BRL	NA	BRL	BRL	BRL	BRL	NA	NA	NA	BRL
	6/20/2007	547.27	22.66	524.61	<25	<25	<5.0	<5.0	<5.0	NA	<15	<5.0	<5.0	5.3	<5.0	NA	NA	45,000 D	
	9/20/2007	547.27	28.97	518.30	<250	<250	NA	<50	<50	NA	<150	<50	<50	NA	NA	NA	NA	1,000	
	12/18/2008	547.27	3.65	544.22	<250	<250	<50	<50	<50	<50	<150	<50	<50	<50	NA	NA	NA	770	
	3/17/2008	547.27	14.13	537.28	320	<250	<50	<50	<50	<50	<150	<50	<50	<50	<50	<50	<50	530	
	6/4/2008	547.27	48.08	514.69	<250	<250	<50	<50	<50	<50	<150	<50	<50	<50	<50	<50	<50	410	
	9/10/2008	547.27	41.68	517.90	<12,000	<15,000	<2,500	<2,500	<2,500	<2,500	<2,500	<2,500	<2,500	<2,500	<2,500	<2,500	<2,500	25,000	
	12/17/2008	547.27	9.99	540.21	<2,500	<2,500	<500	<500	<500	<500	<1,500	<500	<500	<500	<500	<500	<500	<500	6,600
35	3/23/2009	547.27	45.36	515.20	<25	<25	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	22 B
	6/17/2009	547.27	42.89	516.94	<25	<25	<5.0	<5.0	<5.0	<5.0	<11	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	2.2 J.B
	9/17/2009	547.27	44.76	515.62	<120	<120	<25	<25	<25	<25	<50	<25	<25	<25	<25	<25	<25	<25	630
	12/17/2009	547.27	13.25	537.90	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	40
	3/10/2010	547.27	4.50	544.09	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	1.4 J
	6/1/2010	547.27	7.43	542.02	<25	<25	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
	9/28/2010	547.27	5.77	543.19	<25	<25	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
	3/23/2009	547.27	45.36	515.20	<2500	<2500	<500	<500	<500	<500	<1,000	<500	<500	<500	<500	<500	<500	<500	3,800 D
	6/17/2009	547.27	42.89	516.94	<25	<25	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	0.94 J.B
	23	9/17/2009	547.27	44.76	515.62	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
12/17/2009		547.27	13.25	537.90	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	32
3/10/2010		547.27	4.50	544.09	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	1.5 J
6/1/2010		547.27	7.43	542.02	<25	<25	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
9/28/2010		547.27	5.77	543.19	<25	<25	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
RW-6 (Recovery well, gauge & sample)	8/26/2003	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	140,000
	9/9/2005	NG	NG	NG	5	NA	NA	NA	NA	NA	NA	NA	BRL	NA	NA	NA	NA	NA	3,300 D
	2/23/2007	NG	NG	NG	BRL	BRL	NA	BRL	BRL	BRL	NA	BRL	BRL	BRL	BRL	NA	NA	NA	BRL
	6/20/2007	547.89	12.71	535.18	<25	<25	<5.0	<5.0	<5.0	<5.0	NA	<15	<5.0	<5.0	<5.0	<5.0	<5.0	NA	<5.0
	9/20/2007	547.89	17.40	530.49	<25	<25	NA	<5.0	<5.0	<5.0	NA	<15	<5.0	<5.0	<5.0	NA	NA	NA	<5.0
	12/19/2007	547.89	1.62	544.71	<25	<25	<5.0	<5.0	<5.0	<5.0	<15	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
	3/19/2008	547.89	4.58	543.81	<25	<25	<5.0	<5.0	<5.0	<5.0	<15	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
	6/4/2008	547.89	36.96	514.96	<25	<25	<5.0	<5.0	<5.0	<5.0	<15	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
	9/11/2008	547.89	37.58	514.41	<25	<25	<5.0	<5.0	<5.0	<5.0	<15	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
	12/17/2008	547.89	38.38	512.80	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
RW-6 (Recovery well, gauge & sample)	3/23/2009	547.89	7.81	540.84	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	6/17/2009	547.89	33.77	517.80	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	9/17/2009	547.89	9.81	539.06	<25	<25	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
	12/16/2009	547.89	11.76	537.41	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	3/10/2010	547.89	4.51	543.87	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	6/1/2010	547.89	6.70	541.92	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	9/28/2010	547.89	5.89	542.64	<25	<25	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0

Notes:
 <1.0 - Not detected at or above the laboratory reporting limit shown.
 P - Sample results are from a pumping test.
 All units reported in µg/L - micrograms per liter (parts per billion)
 B - analysis found in the associated blank, as well as in the sample
 Bolded - Detection above laboratory reporting limits
 BRL - State laboratory reporting limits
 BTEX - benzene, toluene, ethylbenzene, and total xylenes.
 Corrected Water Table Elevation - Determined by trigonometry for wells MW-D6, MW-D11 to MW-D13, and RW-4 to RW-6
 D - Sample recovery unreportable due to dilution.
 DRY - Insufficient water to gauge or sample
 J - The reported concentration is estimated the result is less than the sample quantitation limit but greater than zero
 NA - not analyzed
 NG - not gauged/or data not available
 NS - not sampled
 NYSDEC Standards and Guidance Values - New York State Department of Environmental Conservation Technical and Operational Guidance Series (TOGS) 1.1.1, Ambient Water Quality Standards and Guidance Values, June 1996 and Addendum April 2009
 Shading - Reported concentration detected above the applicable standard(s) or guidance value(s)

FIGURES



LATITUDE: 43° 05' 03" N
 LONGITUDE: 77° 37' 19" W



SITE LOCATION

NEWBURGH, NY

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REFERENCES:

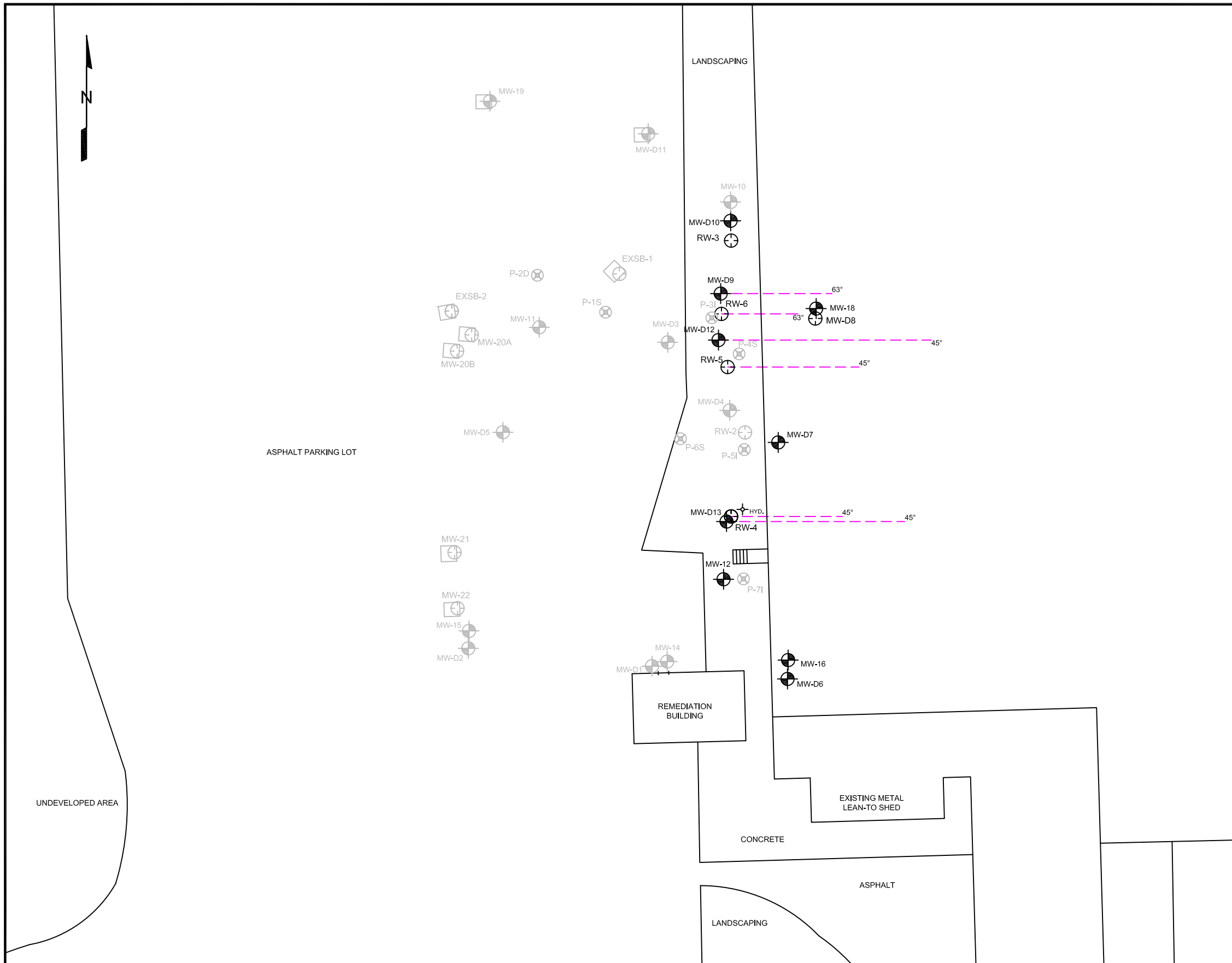
1. AERIAL IMAGES "w_14041124_12_09000_col_20051.sid" AND "w_14041126_12_09000_col_20051.sid" © NYS CLEARING HOUSE.
2. KLEINFELDER FIELD RESEARCH.



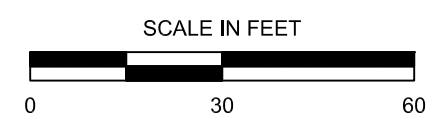
PROJECT NO.	105651
DRAWN:	01/19/10
DRAWN BY:	KAW
CHECKED BY:	TS
FILE NAME:	SANOFISSURJAN10.dwg

AREA MAP	
UCB FACILITY NYSDEC VCP# V00126-8 755 JEFFERSON ROAD ROCHESTER	
MONROE COUNTY	NEW YORK

FIGURE
1



LEGEND	
	MONITORING WELL
	RECOVERY WELL
	PIEZOMETER
	ABANDONED MONITORING WELL
	ABANDONED RECOVERY WELL
	ABANDONED PIEZOMETER
	ABANDONED VAULT
	FIRE HYDRANT
	ANGLED WELL (ANGLE MEASURED FROM GROUND SURFACE)



NEWBURGH, NY

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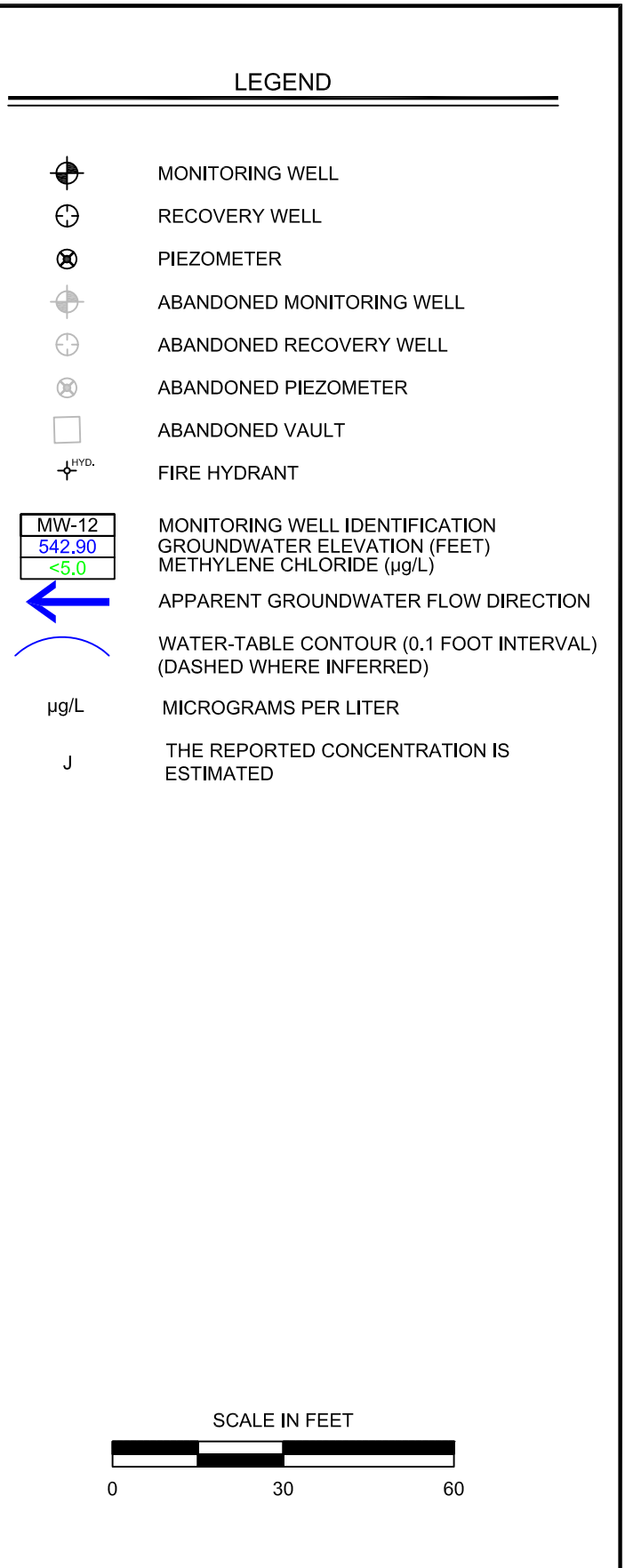
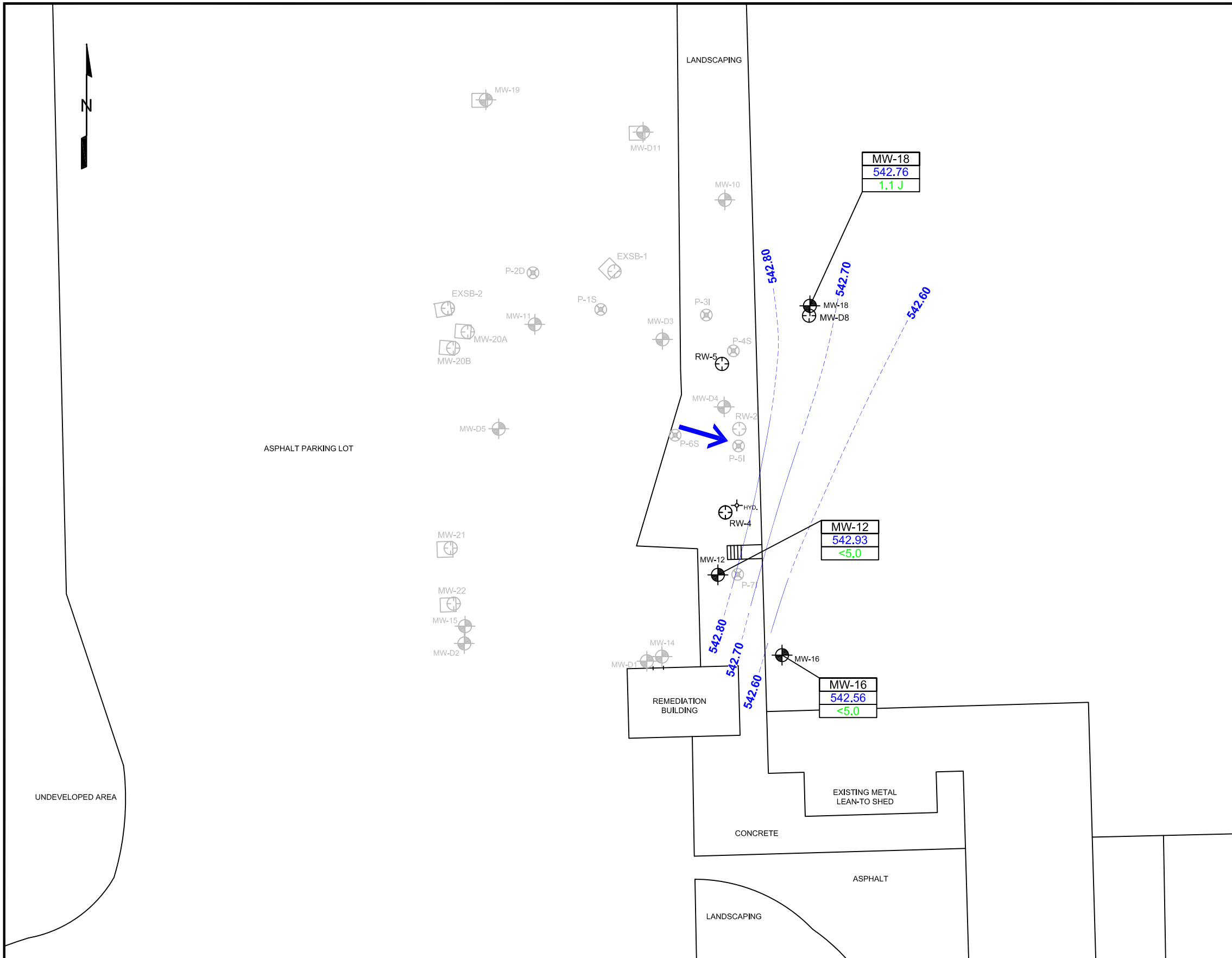
- REFERENCES:**
- "WELL LOCATION MAP" PREPARED BY ERM, DATED SEPTEMBER, 2006.
 - KLEINFELDER FIELD RESEARCH.



PROJECT NO.	109794
DRAWN:	10/27/10
DRAWN BY:	CTH
CHECKED BY:	TS
FILE NAME:	SANOFISSUROCT10.dwg

SITE PLAN
UCB FACILITY NYSDEC VCP# V00126-8 755 JEFFERSON ROAD

FIGURE
2



NOTES:

- GROUNDWATER MONITORING WELLS WERE GAUGED AND SAMPLED ON SEPTEMBER 28-29, 2010.
- SYSTEM WAS NOT OPERATIONAL AT THE TIME OF GAUGING AND SAMPLING.

REFERENCES:

- "WELL LOCATION MAP" PREPARED BY ERM, DATED SEPTEMBER, 2006.
- KLEINFELDER FIELD RESEARCH.



PROJECT NO.	109794
DRAWN:	10/27/10
DRAWN BY:	CTH
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FILE NAME:	SANOFISSUROCT10.dwg

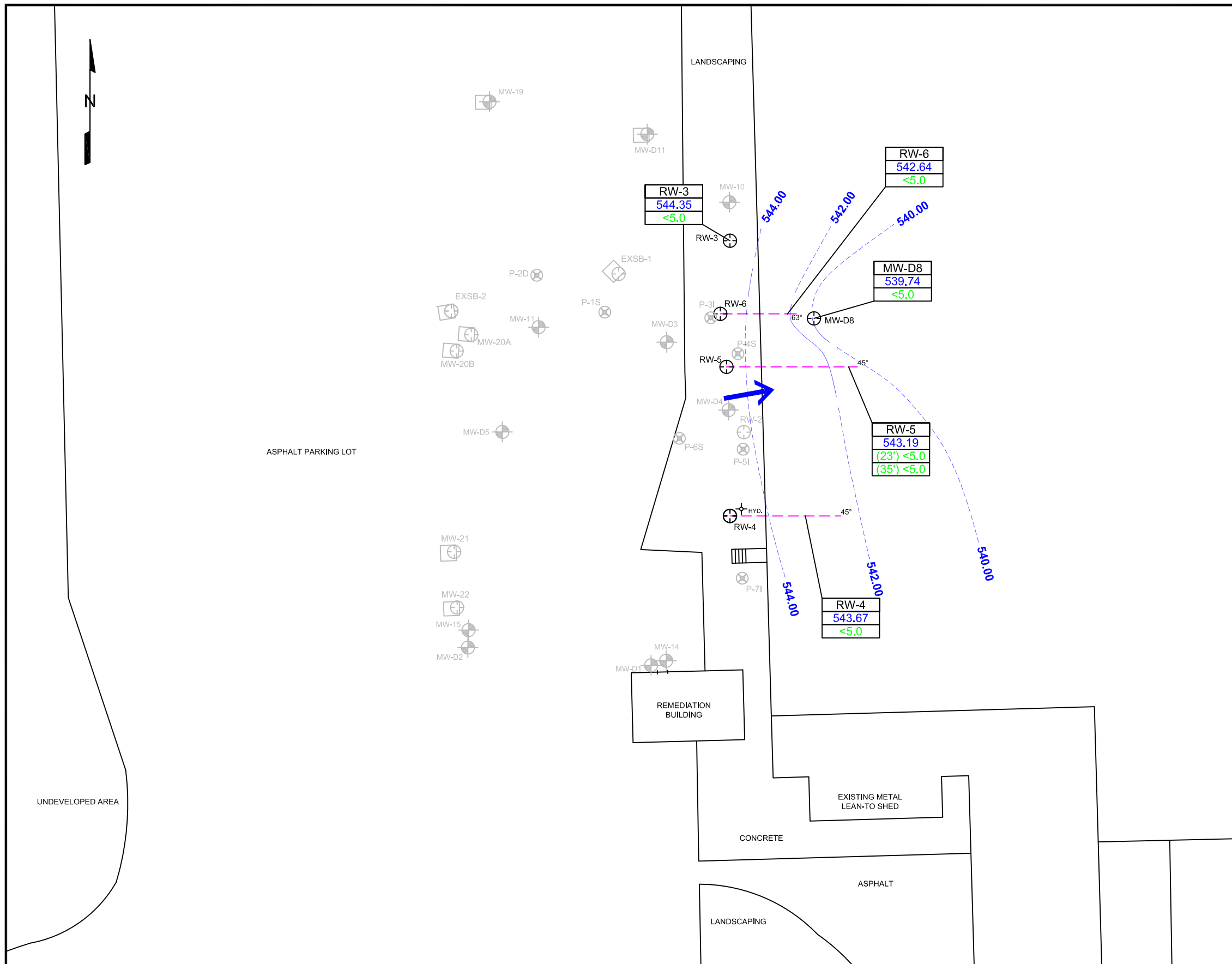
GROUNDWATER CONTOUR AND CONCENTRATION MAP SHALLOW WELLS

UCB FACILITY
NYSDEC VCP# V00126-8
755 JEFFERSON ROAD

FIGURE
3

NEWBURGH, NY

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LEGEND

	RECOVERY WELL			
	PIEZOMETER			
	ABANDONED MONITORING WELL			
	ABANDONED RECOVERY WELL			
	ABANDONED PIEZOMETER			
	ABANDONED VAULT			
	FIRE HYDRANT			
	ANGLED WELL (ANGLE MEASURED FROM GROUND SURFACE)			
<table border="1" style="font-size: small;"> <tr><td>RW-6</td></tr> <tr><td>542.64</td></tr> <tr><td><5.0</td></tr> </table>	RW-6	542.64	<5.0	MONITORING WELL IDENTIFICATION GROUNDWATER ELEVATION (FEET) METHYLENE CHLORIDE (µg/L)
RW-6				
542.64				
<5.0				
	APPARENT GROUNDWATER FLOW DIRECTION			
	WATER-TABLE CONTOUR (2.0 FOOT INTERVAL) (DASHED WHERE INFERRED)			
µg/L	MICROGRAMS PER LITER			



- NOTES:**
- GROUNDWATER MONITORING WELLS WERE GAUGED AND SAMPLED ON SEPTEMBER 28-29, 2010.
 - SYSTEM WAS NOT OPERATIONAL AT THE TIME OF GAUGING AND SAMPLING.

- REFERENCES:**
- "WELL LOCATION MAP" PREPARED BY ERM, DATED SEPTEMBER, 2006.
 - KLEINFELDER FIELD RESEARCH.

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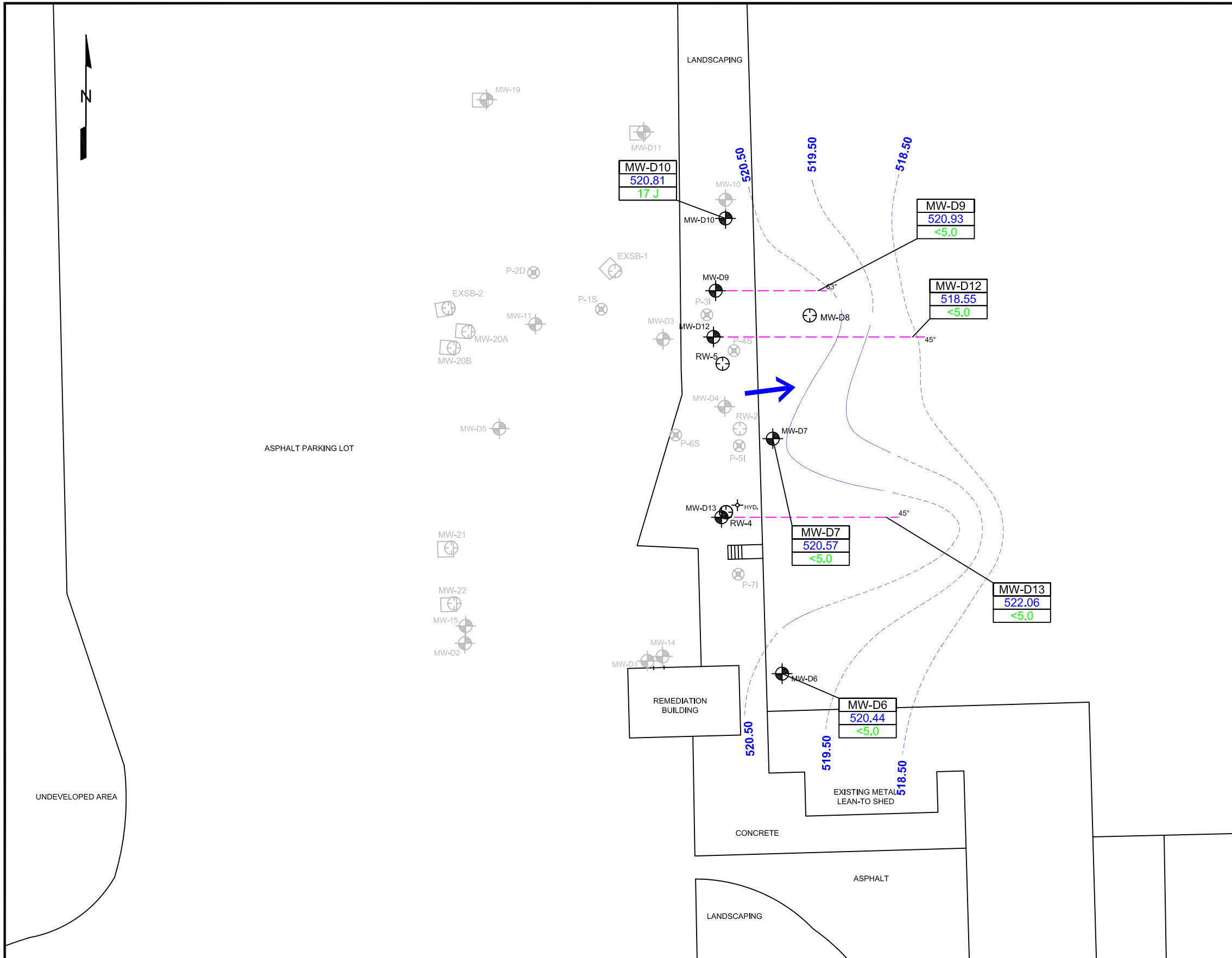
PROJECT NO.	109794
DRAWN:	10/27/10
DRAWN BY:	CTH
CHECKED BY:	TS
FILE NAME:	SANOFISSUROCT10.dwg

GROUNDWATER CONTOUR AND CONCENTRATION MAP INTERMEDIATE WELLS

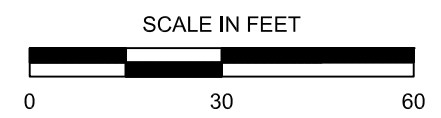
UCB FACILITY
NYSDEC VCP# V00126-8
755 JEFFERSON ROAD

FIGURE

4



LEGEND	
	MONITORING WELL
	RECOVERY WELL
	PIEZOMETER
	ABANDONED MONITORING WELL
	ABANDONED RECOVERY WELL
	ABANDONED PIEZOMETER
	ABANDONED VAULT
	FIRE HYDRANT
	ANGLED WELL (ANGLE MEASURED FROM GROUND SURFACE)
	MONITORING WELL IDENTIFICATION GROUNDWATER ELEVATION (FEET) METHYLENE CHLORIDE (µg/L)
	APPARENT GROUNDWATER FLOW DIRECTION
	WATER-TABLE CONTOUR (1.0 FOOT INTERVAL) (DASHED WHERE INFERRED)
µg/L	MICROGRAMS PER LITER
J	THE REPORTED CONCENTRATION IS ESTIMATED



NOTES:

- GROUNDWATER MONITORING WELLS WERE GAUGED AND SAMPLED ON SEPTEMBER 28-29, 2010.
- SYSTEM WAS NOT OPERATIONAL AT THE TIME OF GAUGING AND SAMPLING.

REFERENCES:

- "WELL LOCATION MAP" PREPARED BY ERM, DATED SEPTEMBER, 2006.
- KLEINFELDER FIELD RESEARCH.



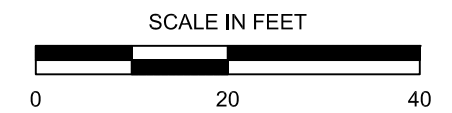
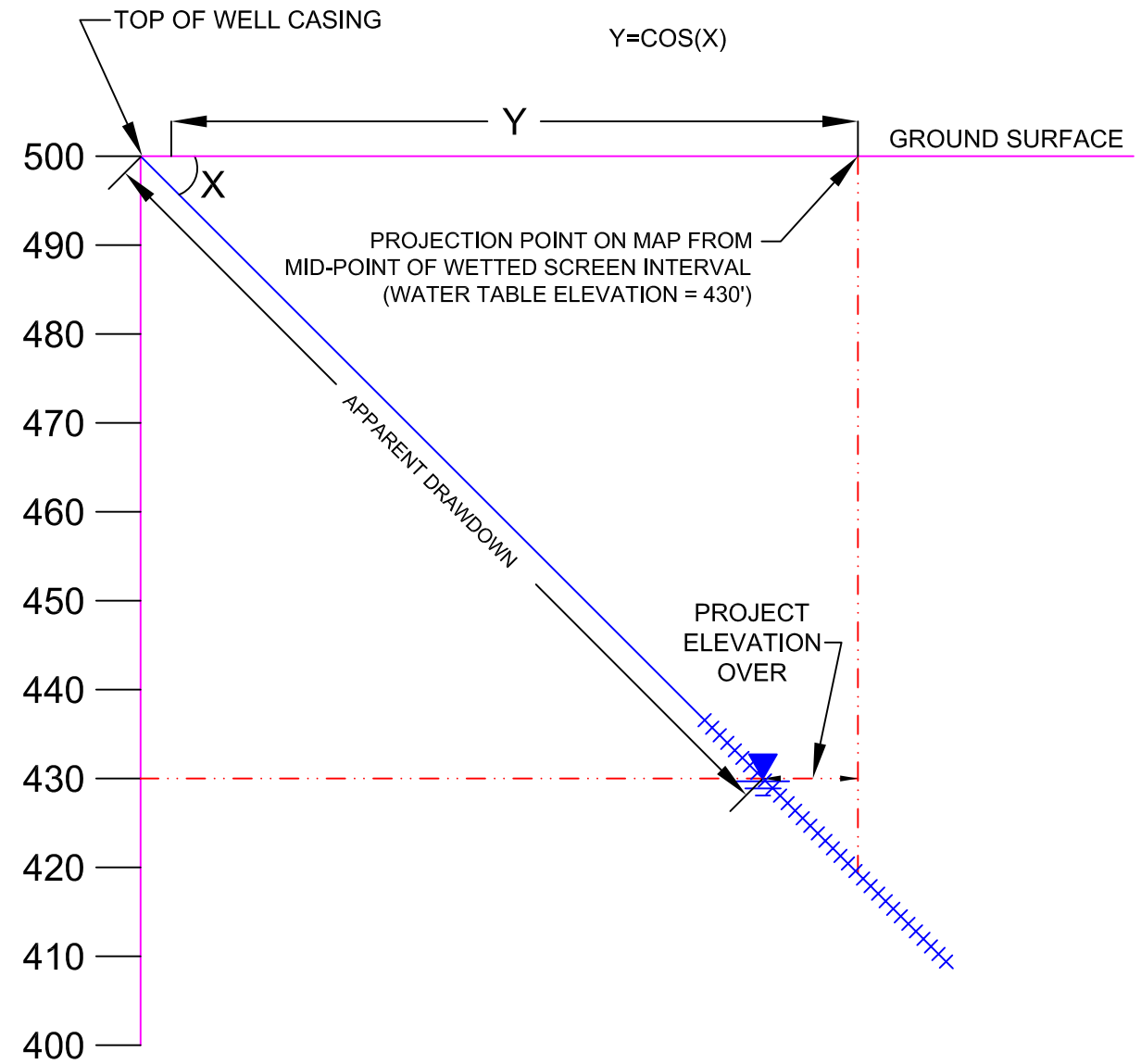
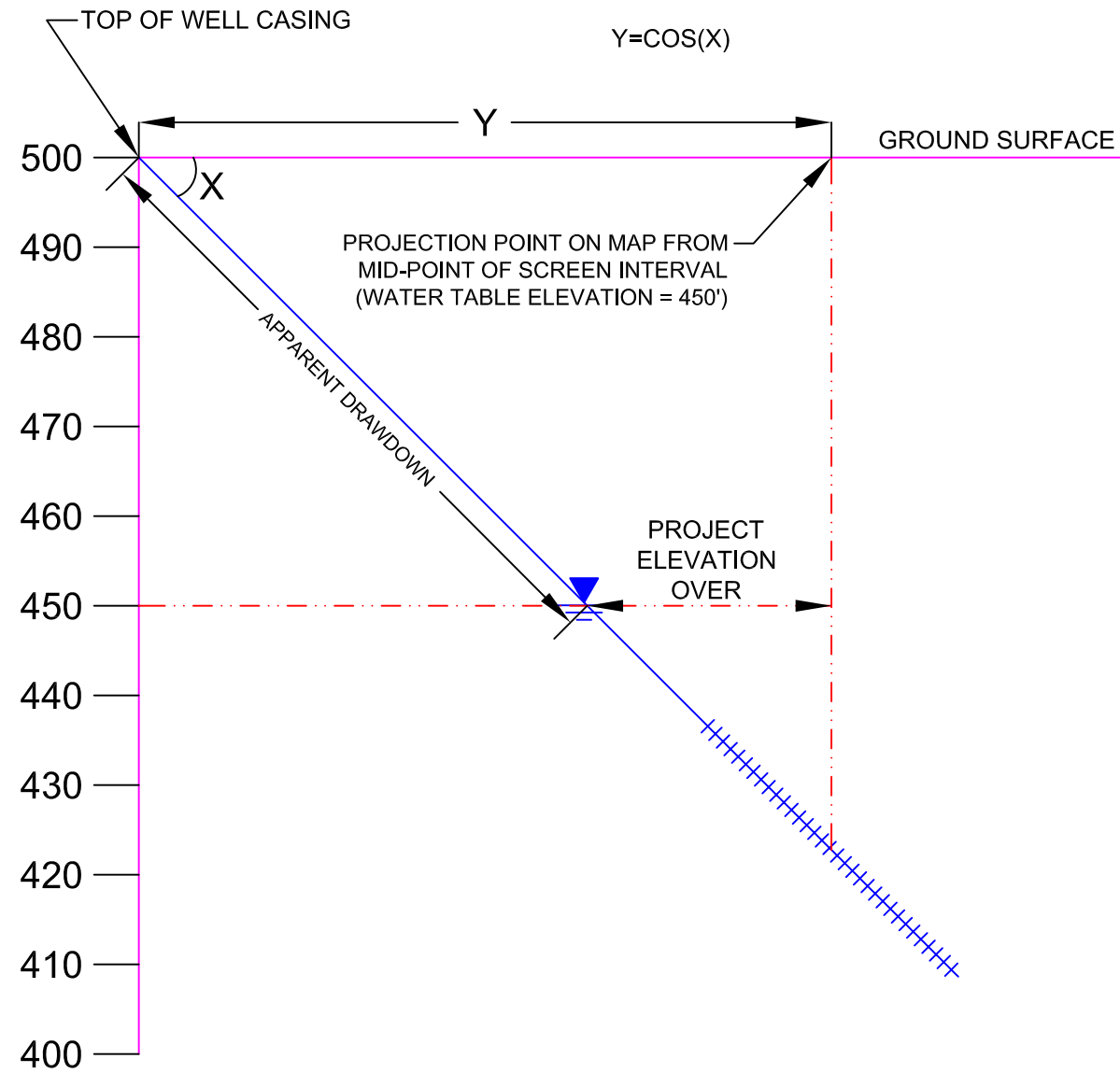
PROJECT NO.	105651
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FILE NAME:	SANOFISSUROCT10.dwg

GROUNDWATER CONTOUR AND CONCENTRATION MAP DEEP WELLS

UCB FACILITY
NYSDEC VCP# V00126-8
755 JEFFERSON ROAD

FIGURE
5

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REFERENCES:

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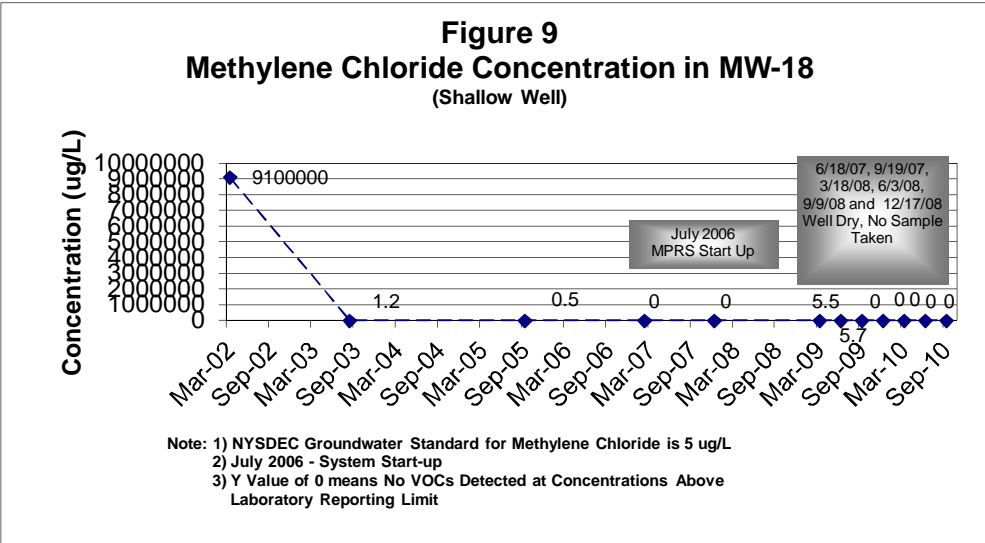
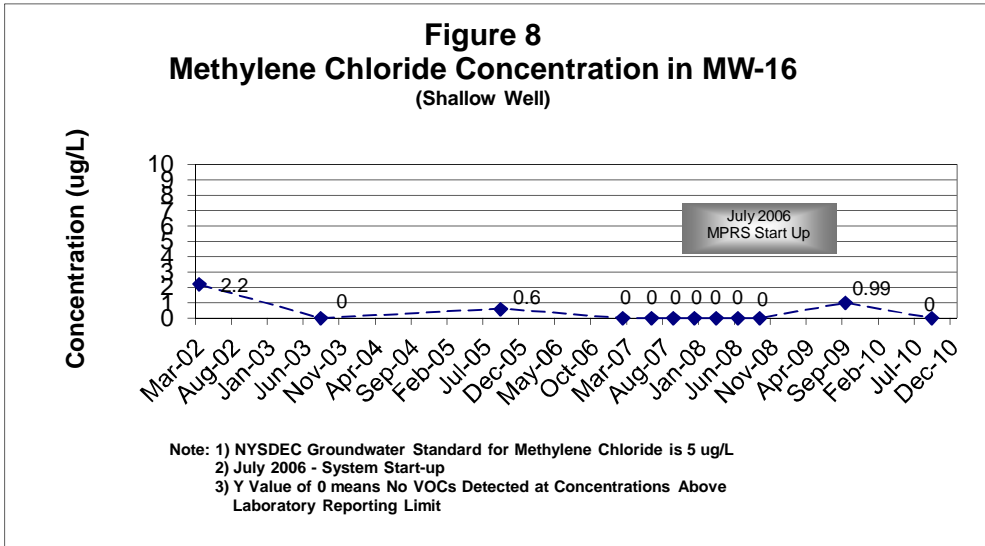
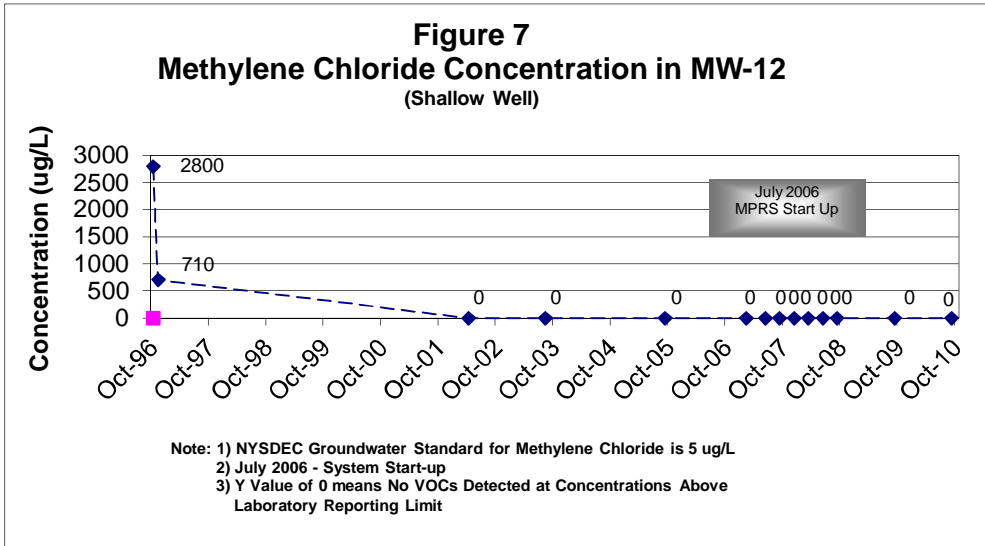
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DRAWN:	01/21/10
DRAWN BY:	CTH
CHECKED BY:	TS
FILE NAME:	SANOFISSURJAN10.dwg

**DIAGONAL WELL
POTENTIOMETRIC CONVERSION**

UCB FACILITY
 NYSDEC VCP# V00126-8
 755 JEFFERSON ROAD
 ROCHESTER
 MONROE COUNTY NEW YORK

FIGURE

6



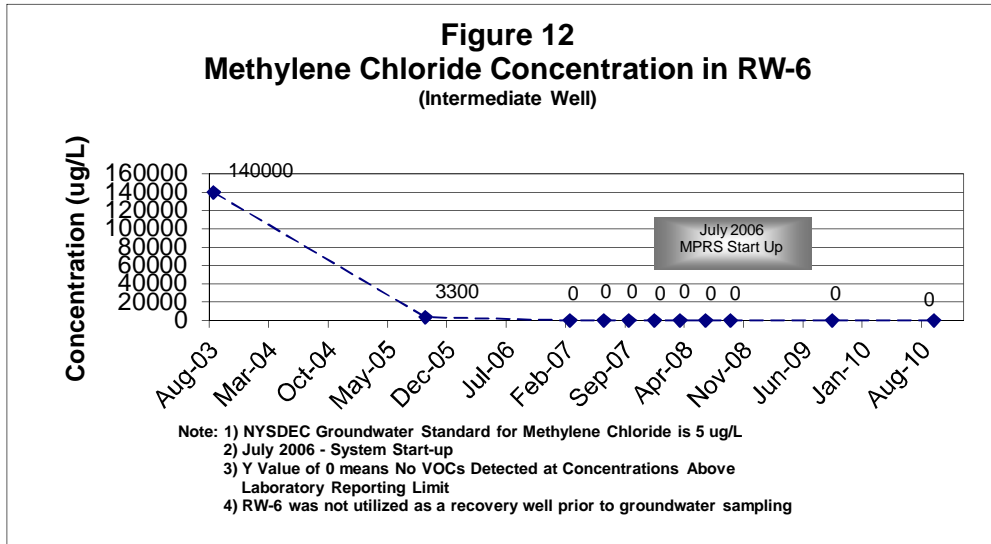
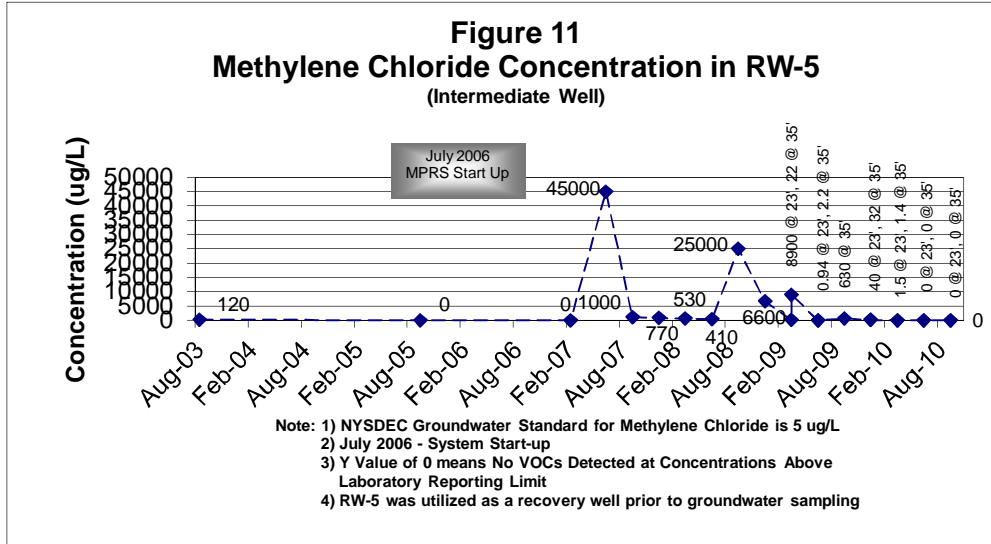
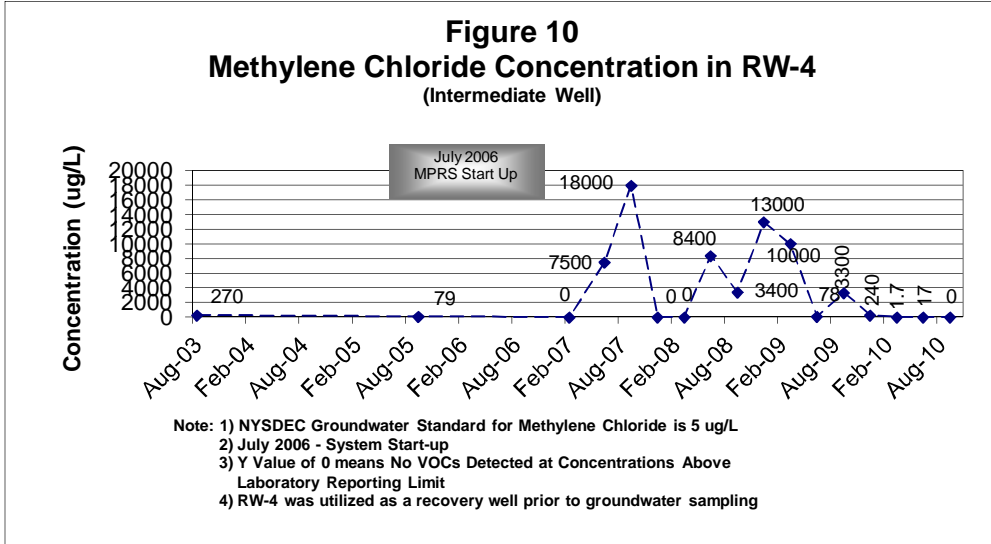


Figure 13
Methylene Chloride Concentration in MW-D6
 (Deep Well)

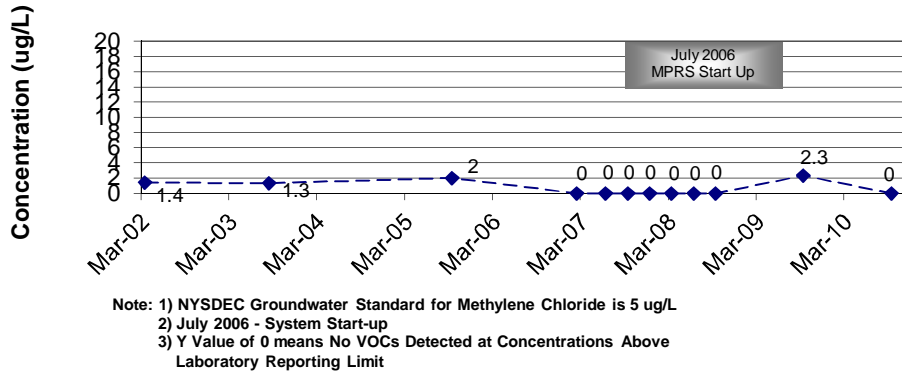


Figure 14
Methylene Chloride Concentration in MW-D7
 (Deep Well)

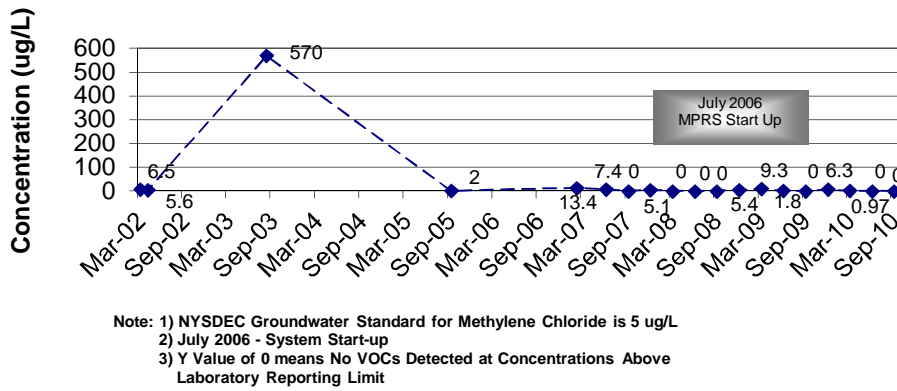


Figure 15
Methylene Chloride Concentration in MW-D8
 (Deep Well)

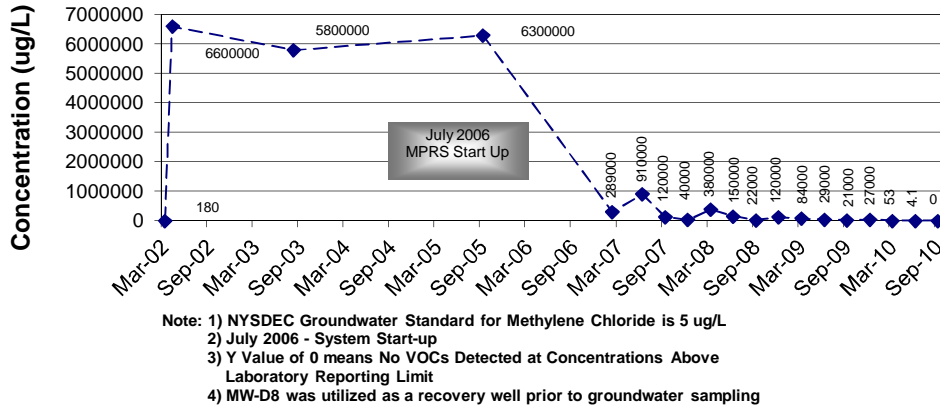
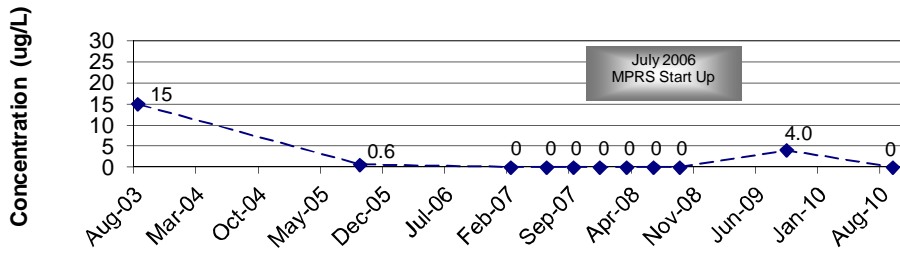
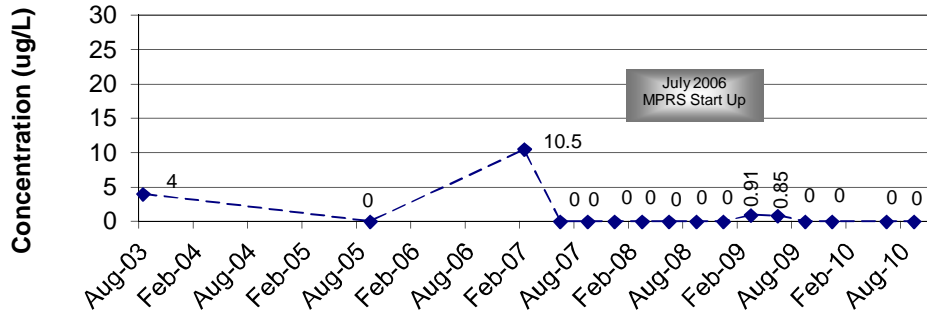


Figure 16
Methylene Chloride Concentration in MW-D10
 (Deep Well)



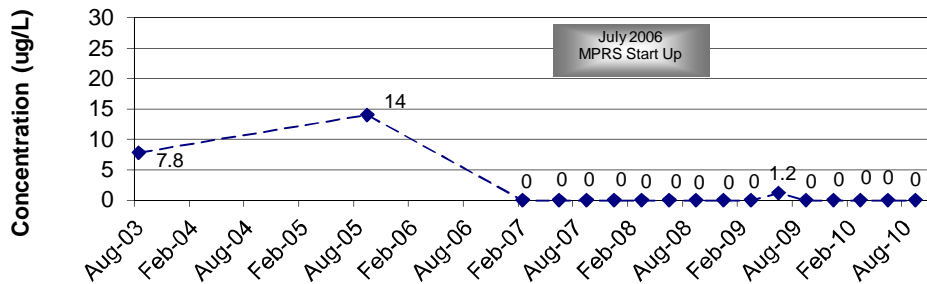
Note: 1) NYSDEC Groundwater Standard for Methylene Chloride is 5 ug/L
 2) July 2006 - System Start-up
 3) Y Value of 0 means No VOCs Detected at Concentrations Above Laboratory Reporting Limit

Figure 17
Methylene Chloride Concentration in MW-D12
 (Deep Well)



Note: 1) NYSDEC Groundwater Standard for Methylene Chloride is 5 ug/L
 2) July 2006 - System Start-up
 3) Y Value of 0 means No VOCs Detected at Concentrations Above Laboratory Reporting Limit

Figure 18
Methylene Chloride Concentration in MW-D13
 (Deep Well)



Note: 1) NYSDEC Groundwater Standard for Methylene Chloride is 5 ug/L
 2) July 2006 - System Start-up
 3) Y Value of 0 means No VOCs Detected at Concentrations Above Laboratory Reporting Limit

Appendix A
Monthly Progress Report – July 2010



August 9, 2010

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: Monthly Progress Report – July 2010
755 Jefferson Road Facility – Henrietta, New York
NYSDEC VCP Number V00126-8

***Key Actions
This Period:***

- **July 1 – July 31, 2010.** The system was intermittently operational in accordance with the NYSDEC approved pulsing plan.

Operations Metrics (July 26 – August 2)

- Operational Time: 170 out of a scheduled 170 hours of operation.
- Uptime Efficiency: 100%
- Volume of Groundwater Treated: 1,276 gallons.
 - Discharged to: The sanitary sewer system.
- Total estimated VOC mass recovered to date: 138.9 lbs.
- Total estimated VOC mass recovered during July: 0.073 lbs.
- Mean estimated VOC mass removal rate for July 2010 versus June 2010: 0.0004 versus 0.0002 lbs/hr.
- General weather conditions: Average precipitation and average temperatures as compared to historical data.

Tables, Figures and Graphs

- Table 1: July Treated Waste Water Flow/Vapor Monitoring Data.
- Table 2: July Recovery Well Rotation Data.
- Figures 1-9: Remedial Effectiveness and Efficiency Platform (REEP) graphs.
- Figures 2A and 3A: Selected Remedial Effectiveness and Efficiency Platform (REEP) graphs showing results from April 2009 to present.

***Problems/
Resolutions:***

- None

***Analytical Data
Received:***

- The July 2010 MPRS liquid influent analytical data.
- The July 2010 MPRS vapor influent analytical data.

***Documents
Submitted:***

- Monthly Progress Report for June 2010 dated July 9, 2010.

**Anticipated
Actions –
August
2010:**

- Well abandonments have been approved by the NYSDEC via email correspondence dated July 29, 2010. Abandonment activities will occur during the month of August 2010.

Comments:

- The attached REEP information is to be utilized as a subjective representation of the overall effectiveness/performance of the system as we are using discontinuous data and PID measurements for the removal calculations. We do not intend this tool as a definitive summary of recovered mass.
- MPRS operation and efficiency, inclusive of the replacement LRP pump and associated upgrades and maintenance, will continue to be monitored.
- Submittal of the Draft MCA OM&M FER, Site Wide Petition for Remedial Closeout and revised Site Management Plan has been completed.
- Submittal of the final MCA OM&M FER, Site Wide Petition for Remedial Closeout and revised Site Management Plan is tentatively scheduled for September 2010, if final comments from the NYSDEC are received before the end of August 2010.

**NYSDEC-
Approved Field
Decisions:**

- Approval was granted by the NYSDEC to terminate system operation following the July operational period via email correspondence dated July 29, 2010.

If you have any questions regarding this monthly report or progress on the project, please don't hesitate to contact me at 513-314-7543 or rbethel@qmg-inc.com.

Sincerely,
QUANTUM MANAGEMENT GROUP, INC.



Rick Bethel
Senior Associate

Attachments

cc:

Mr. Jeffrey M. Kosmala, P.E. (MCDOH)
Mr. Michael Bogdan (Sanofi-Aventis)
Mr. Richard Ricci (Lowenstein Sandler PC)
Mr. Mark Byrne, P.E. (Town of Henrietta)
Ms. Libby Ford, (Nixon Peabody)
Mr. Greg Light (UCB)
Mr. George Hollerbach, P.E. (Quantum)

Ms. Melissa Menetti (NYSDOH)
Mr. David Panipinto (UCB)
Mr. Bart Putzig, P.E. (NYSDEC)
Mr. Sean Keenan (MCDES)
Mr. John Lang, P.E. (Quantum)

**TABLE 1 - TREATED WASTE WATER FLOW/VAPOR MONITORING DATA
MCA REMEDIATION SYSTEM
755 JEFFERSON ROAD, HENRIETTA, NEW YORK
NYSDEC VCP NUMBER V00126-8
July 2010**

Date	Time¹	Cumulative Hours²	Total Flow³ Gallons	Flow Rate⁴ Gal/Min	Cumulative Gallons^{5,6}	Influent PID (ppm)	Effluent PID (ppm)
6/21/2010	11:08	40609.9	218	2.0	342,318	0.1	0.0
7/26/2010	13:35	40610.3	6	0.2	342,324	0.6	0.2
7/26/2010	15:29	40612.2	154	1.3	342,478	0.4	0.0
7/28/2010	12:57	40657.7	357	0.1	342,835	0.5	0.0
7/28/2010	14:54	40659.6	212	1.8	343,047	0.2	0.0
7/30/2010	11:04	40703.8	169	0.1	343,216	0.3	0.0
8/2/2010	13:03	40777.8	162	0.0	343,378	0.3	0.1
8/2/2010	14:54	40779.6	216	2.0	343,594	0.1	0.0

¹Time of day (in military time) data was collected.

²Cumulative Hours represents the number of run-hours since MCA remediation system start-up on 12 July 2006.

³Total Flow in Gallons represents the flow that occurred since the time the last measurement was collected, as indicated in the previous row of the table.

⁴Flow Rate in Gallons/Minute represents the average flow rate since the time the last measurement was collected, as indicated in the previous row of the

⁵Cumulative Gallons represents the number of gallons of water treated by the MCA remediation system since start-up on 12 July 2006.

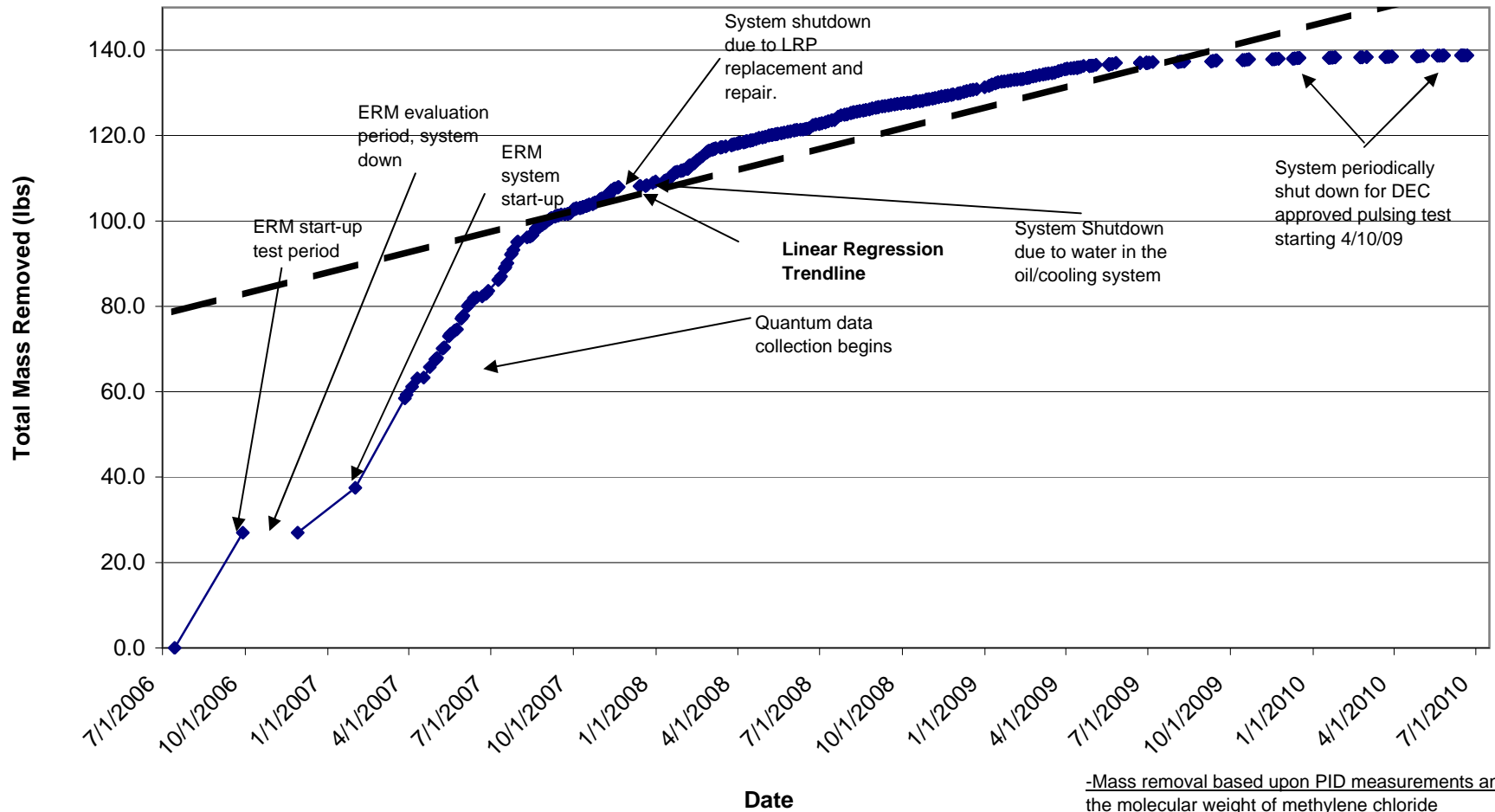
⁶Totalizer Flow readings collected from newly installed totalizer beginning October 2, 2007.

TABLE 2 - RECOVERY WELL ROTATION DATA
MCA REMEDIATION SYSTEM
755 JEFFERSON ROAD, HENRIETTA, NEW YORK
NYSDEC VCP NUMBER V00126-8
July 2010

Date	Well Rotation Clusters								
	EXSB-2	MW-D8	MW -21	MW-22	MW-20A	MW-20B	RW-6	RW-5	RW-4
July 1-25	System shut down as part of NYSDEC approved pulsing program								
July 26-August 2		X						X	X

Figure 1
MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
July 2010

Total VOC Mass Removed (Vapor and Ground Water Combined)



-Mass removal based upon PID measurements and the molecular weight of methylene chloride
-Down time greater than 7 days identified on chart

Figure 2
MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
July 2010

Total VOC Mass Removal Rate (Vapor & Ground Water Combined)

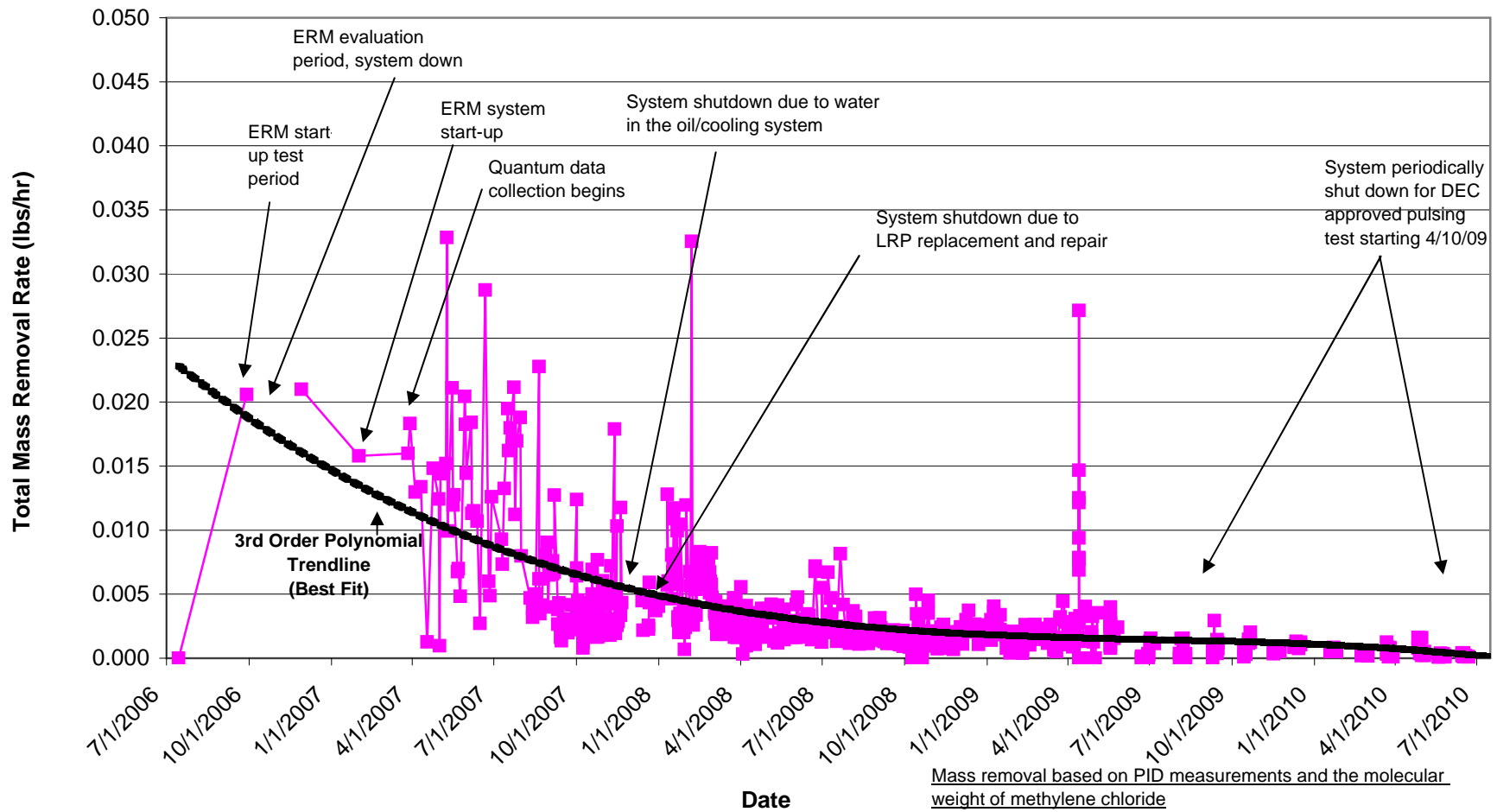


Figure 2A

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
July 2010

Total VOC Mass Removal Rate (Vapor & Ground Water Combined) Since July 2009

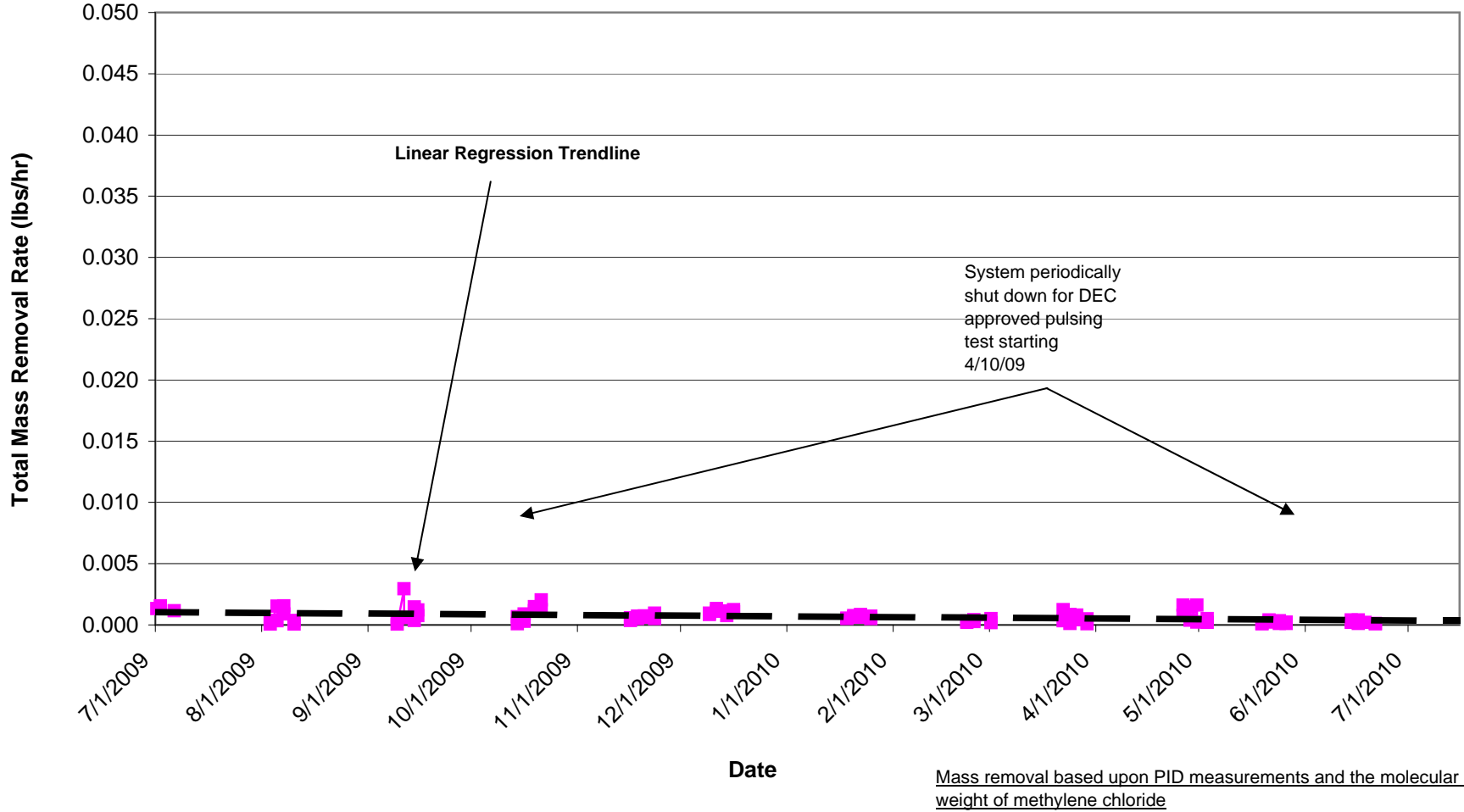


Figure 3

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
July 2010

Vapor Mass Removal Rate

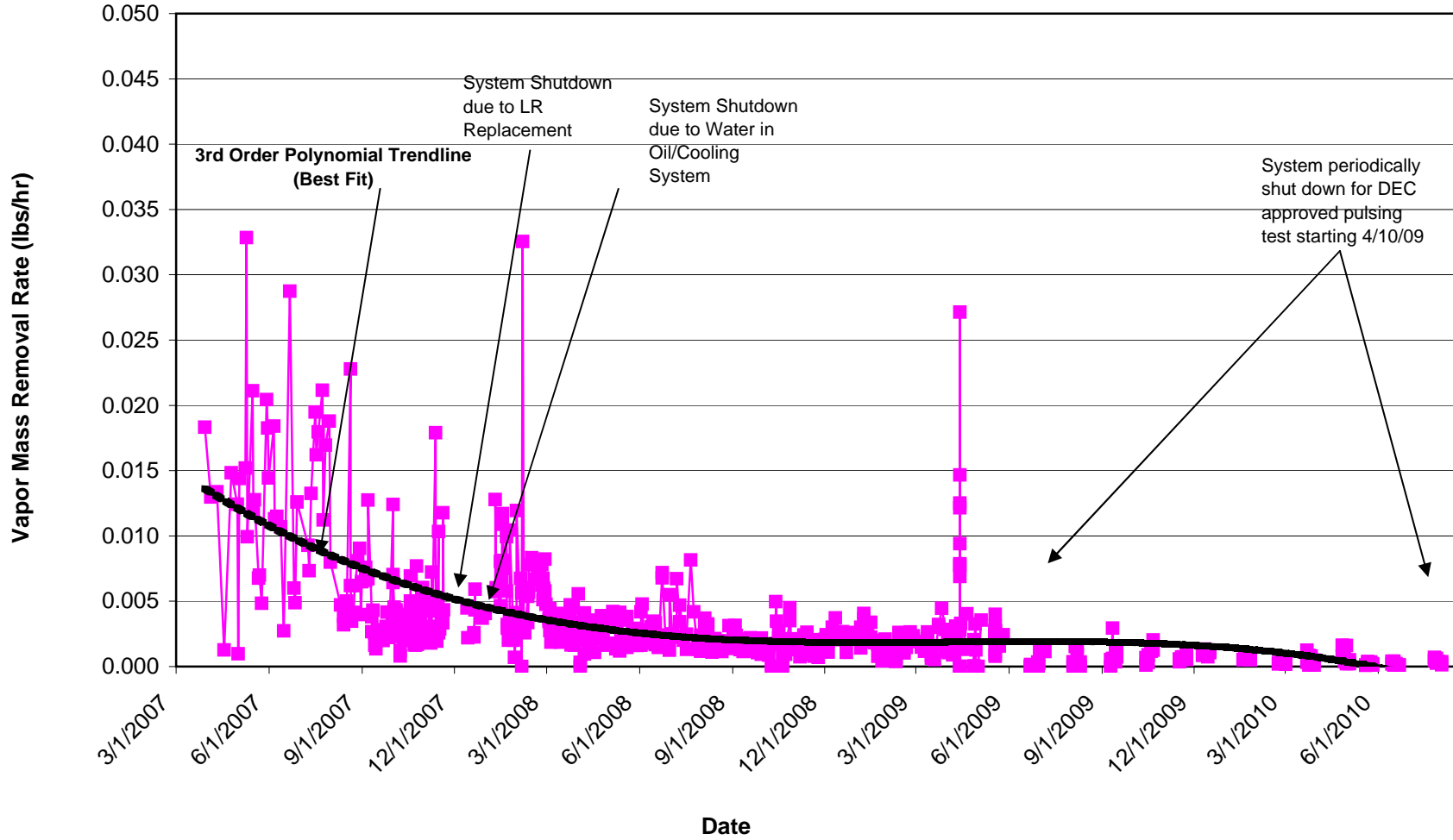


Figure 3A

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
July 2010

Vapor Mass Removal Rate Since July 2009

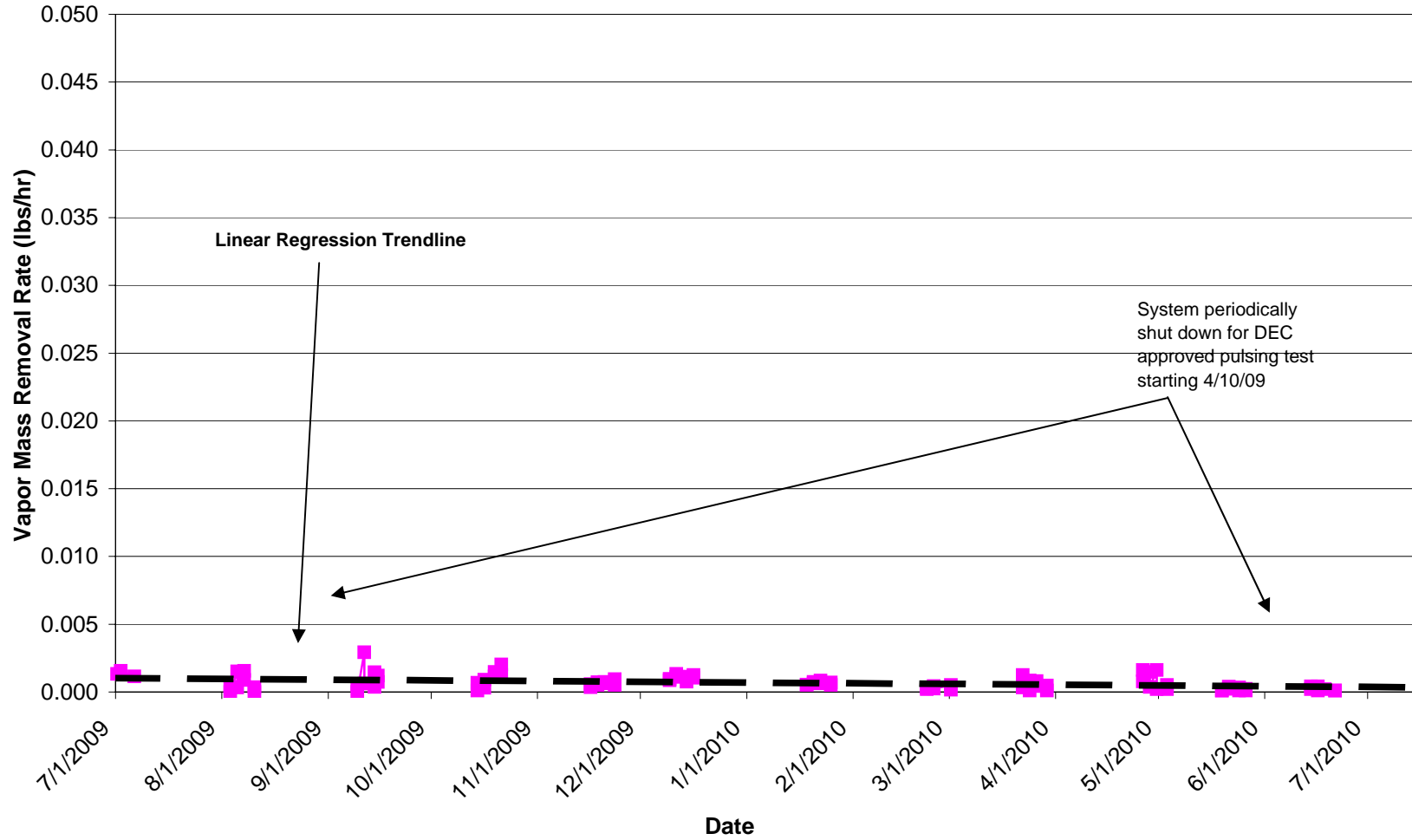


Figure 4

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
July 2010

System Vacuum

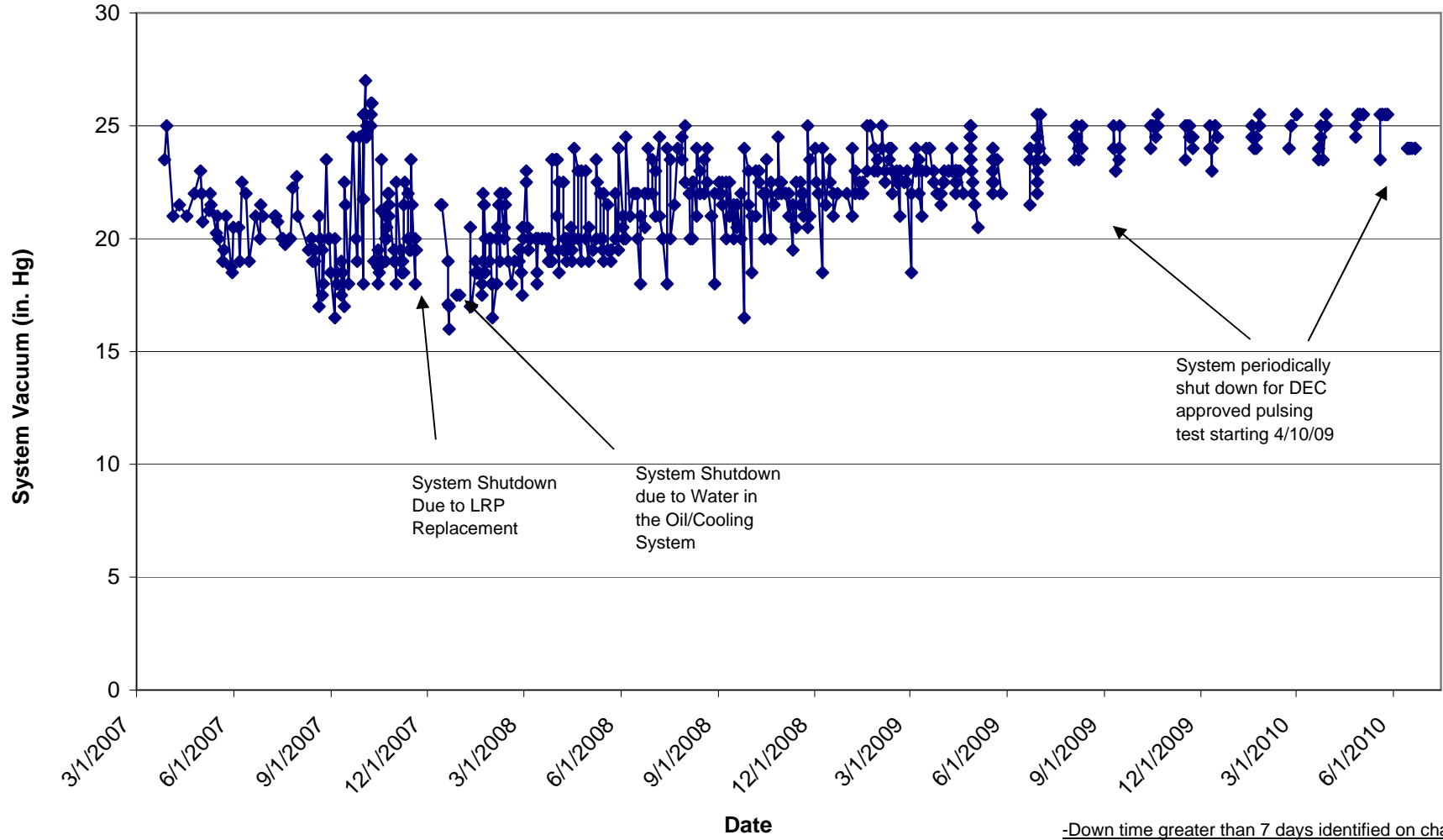
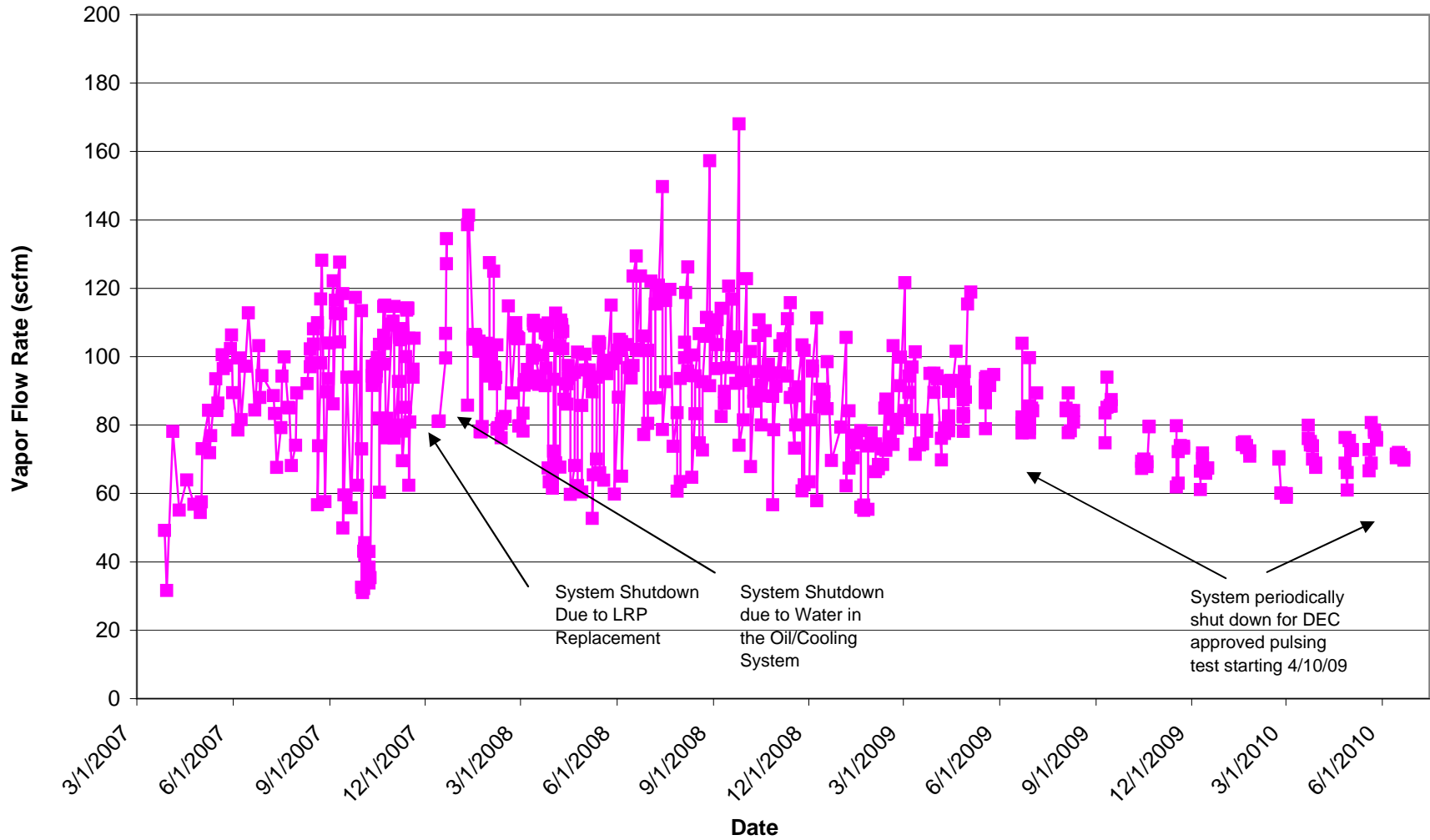


Figure 5

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
July 2010

System Vapor Flow Rate



-Down time greater than 7 days identified on chart

Figure 6

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
July 2010

Total MeCl Mass Removed (Ground Water)

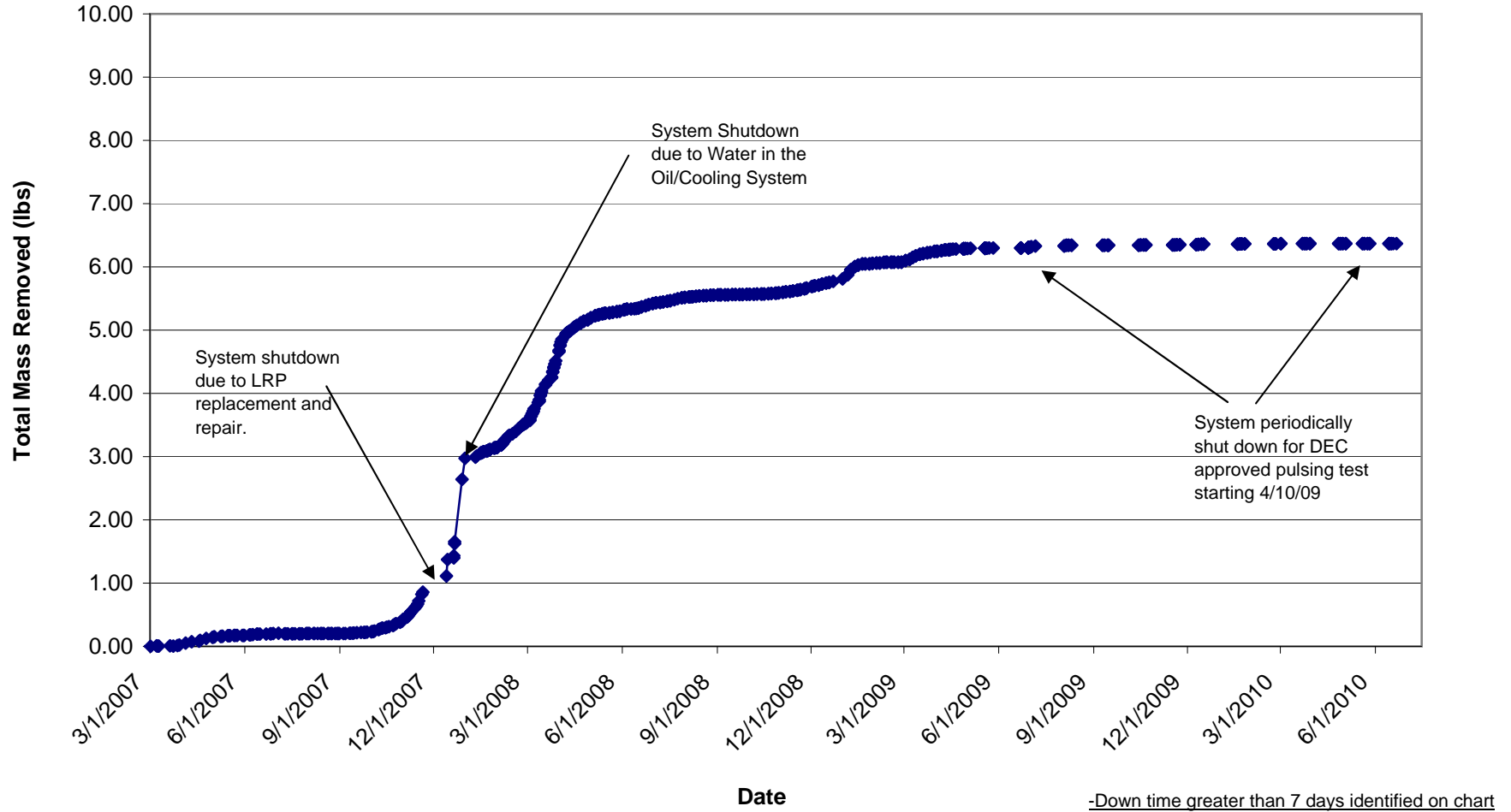


Figure 7

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
July 2010

MeCl Mass Removal Rate (Ground Water)

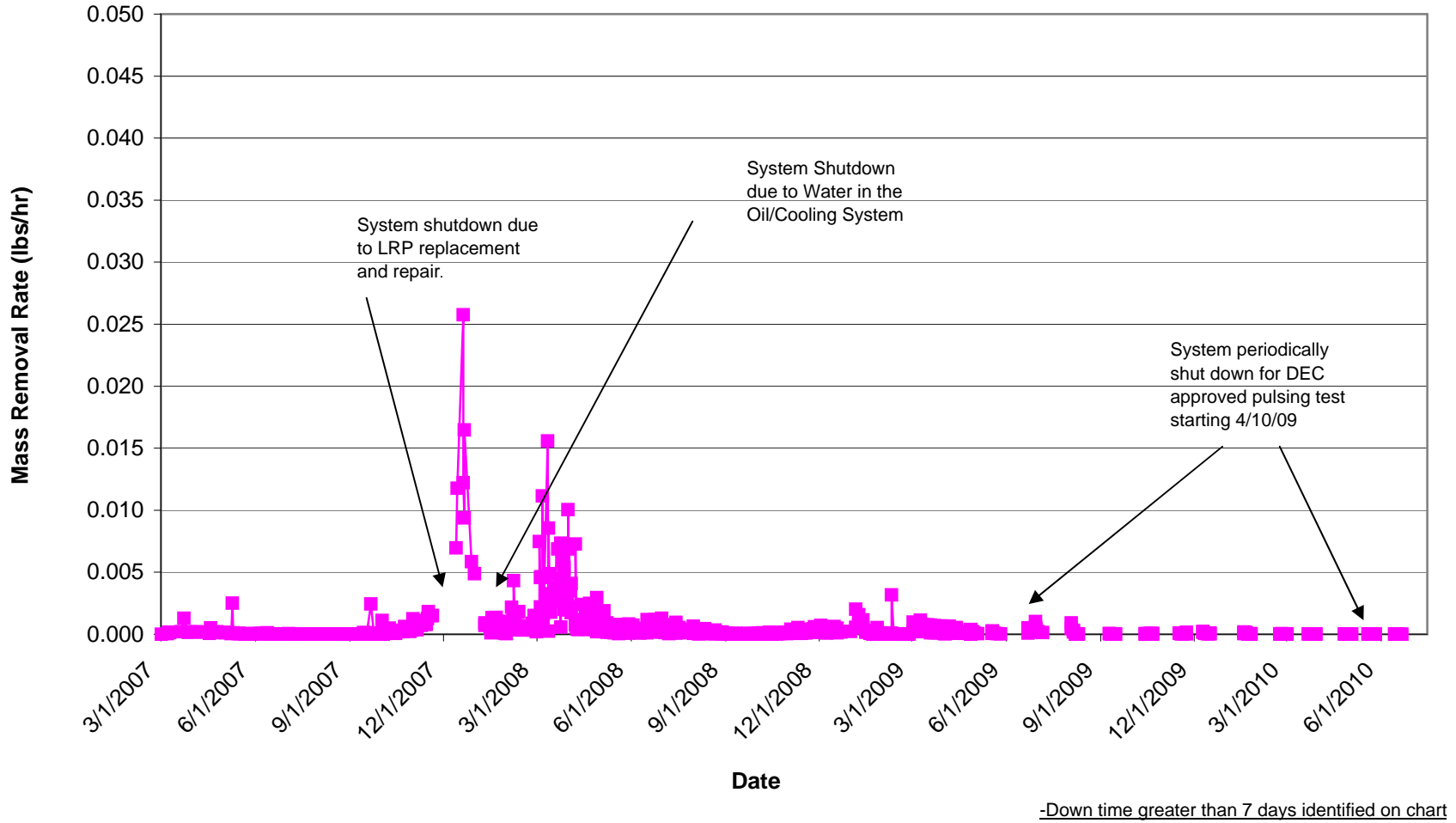
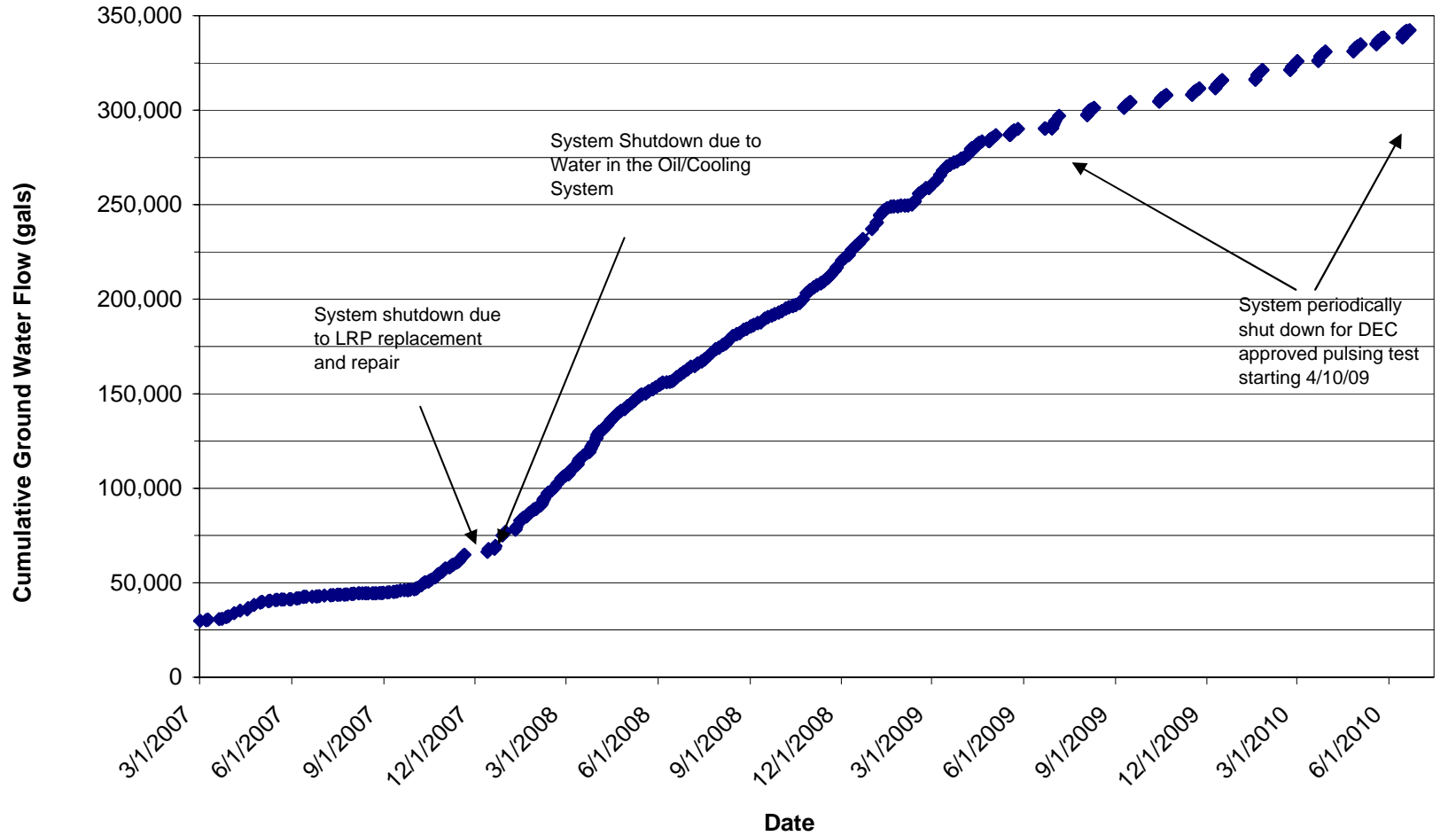


Figure 8

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
July 2010

Cumulative Ground Water Flow

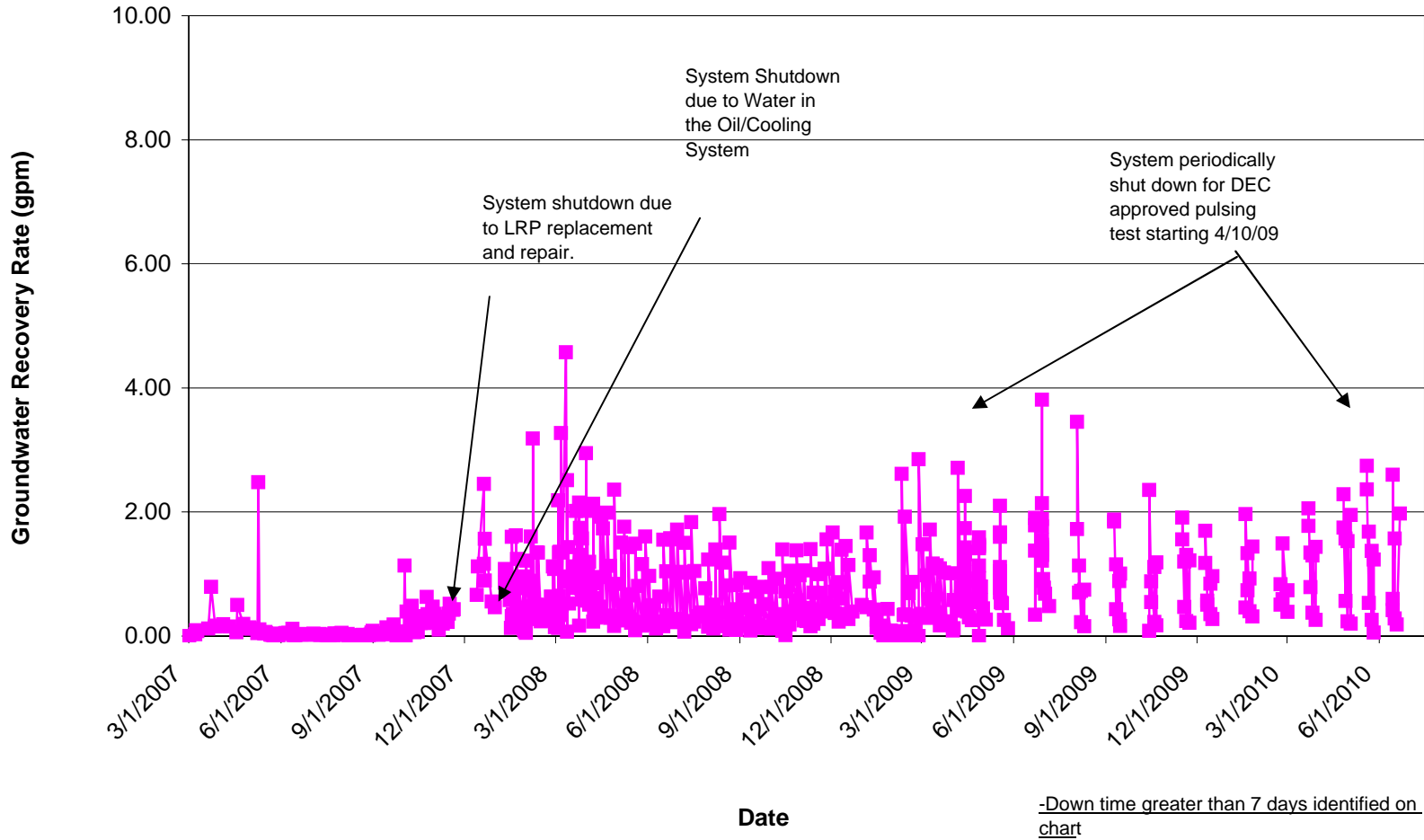


-Down time greater than 7 days identified on chart

Figure 9

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
July 2010

Ground Water Recovery Rate



Volatile Analysis Report for Water

Client: Quantum Management Group

Client Job Site:	MPRS @ UCB Jefferson Rd.	Lab Project Number:	10-3084
Client Job Number:	N/A	Lab Sample Number:	10276
Field Location:	PreBT / Inf 1,2,3 Comp	Date Sampled:	07/28/2010
Field ID Number:	N/A	Date Received:	07/29/2010
Sample Type:	Water	Date Analyzed:	07/30/2010

Liquid Influent

Compounds	Results in ug / L
Acetone	ND< 10.0
Amyl Acetate	ND< 25.0
Benzene	ND< 0.700
2-Butanone	ND< 10.0
Carbon disulfide	ND< 5.00
Chloroform	ND< 2.00
Chloromethane	ND< 2.00
cis-1,2-Dichloroethene	ND< 2.00
Ethyl acetate	ND< 25.0
Isopropyl acetate	ND< 25.0
Methylene chloride	21.6
m,p-Xylene	ND< 2.00
o-Xylene	ND< 2.00

ELAP Number 10958

Method: EPA 624

Data File: V77163.D

Comments: ND denotes Non Detect
ug / L = microgram per Liter

Signature: _____


Bruce Hoogesteger, Technical Director

Volatile Analysis Report for AirClient: **Quantum Management Group**

Client Job Site:	MPRS @ UCB Jefferson Rd	Lab Project Number:	10-3084
		Lab Sample Number:	10277
Client Job Number:	N/A	Date Sampled:	07/28/2010
Field Location:	SP-102 Tedlar Bag	Date Received:	07/29/2010
Field ID Number:	N/A	Date Analyzed:	08/04/2010
Sample Type:	Air		

Vapor Influent

Compound	Results in PPBv	Results in ug / m3
Acetone	ND< 4,220	ND< 10,000
Benzene	ND< 627	ND< 2,000
2-Butanone	ND< 3,400	ND< 10,000
Carbon disulfide	ND< 643	ND< 2,000
Chloroform	ND< 414	ND< 2,000
Chloromethane	ND< 978	ND< 2,000
cis-1,2-Dichloroethene	ND< 509	ND< 2,000
Methylene chloride	ND< 1,460	ND< 5,000
m,p-Xylene	ND< 461	ND< 2,000
o-Xylene	ND< 461	ND< 2,000

ELAP Number 10958

Method: EPA 8260B
Modified for Tedlar Bag

Data File: V77278.D

Comments: ND denotes Non Detect
PPBv = Parts per Billion volume
ug / m3 - Microgram per cubic meter.

Signature: _____

Bruce Hoogesteger: Technical Director

Appendix C

MPRS Pulsing Test Summary Report



August 7, 2009

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: MPRS Pulsing Test Summary Report/June 2009 GWS results
 755 Jefferson Road Facility – Henrietta, New York
 NYSDEC VCP Number V00126-8

Key Actions:

- The pulsing program ran from April 13, 2009 through July 6, 2009 and consisted of four MPRS operation and shut down cycles. Details regarding the system operation and data collected are outlined below. The purpose of performing the pulsing program was to verify that asymptotic conditions have been achieved by the MPRS and so that, consistent with the pending Remedial Construction FER and its OM&M Plan, the MPRS system can be deemed to have completed its work, shut down and dismantled.
- In addition, groundwater sampling and analyses of RW-5 was done at two different intervals (23 and 35 feet below ground surface) in order to verify that the screened interval of this recovery well captures a similar zone of potential impact reflected in horizontal recovery wells MW-20A and MW-20B. Results are summarized in Table 2.
- Also, a verification of PID measurements of Methylene Chloride vapor levels was performed using laboratory analyses of vapors collected in Tedlar bags. Results are summarized in Table 3.

Operations Metrics (April 13 – July 6)

Period/Cycle	Total VOC mean removal rate (lbs/hr)	Total VOC mass removed (lbs)	Groundwater recovery volume (gallons)
Cycle 1 (48hr shut down)	0.0027	0.40	3,673
Cycle 2 (1 week shut down)	0.0024	0.32	3,435
Cycle 3 (2 week shut down)	0.0021	0.42	3,669
Cycle 4 (4 week shut down)	0.0007	0.11	6,897
October 2008 - March 2009	0.0019	0.32	3,222
<i>Normalized for a one week period</i>			

Tables, Figures and Graphs

- Table 1: Pulsing Program Treated Waste Water Flow/Vapor Monitoring Data.
- Table 2: Monitoring Well Gauging and Groundwater Analytical Data
- Table 3: Field PID Measurement vs. Tedlar Bag/Lab Analyses Comparison Table
- Figure 1 – Area Map
- Figure 2 – Site Map
- Figure 3 – Groundwater Concentration Map – Shallow Wells
- Figure 4 – Groundwater Concentration Map – Intermediate Wells
- Figure 5 – Groundwater Concentration Map - Deep Wells
- Figures 6-14: Remedial Effectiveness and Efficiency Platform (REEP) graphs
- Figure 15 – Estimated Cost per Pound of Total VOC Removal

Appendices

- Appendix A: June 2009 Monthly Update Report

Problems/ Resolutions:

- Effluent transfer pump failure on June 22, 2009. The pump was subsequently replaced and the fourth cycle of the pulsing test was initiated on June 29, 2009.

Analytical Data:

- June 2009 ground water sampling analytical results.
- Vapor sampling analytical results.

Comments:

- As summarized in the Table above, the monitoring data collected during the pulsing program indicates that there is negligible gain in recovery efficiency by pulsing the system. Total VOC recovery rate for each pulsing cycle is comparable (or less than) the mean recovery rate for the last six month period of MPRS operation prior to the pulsing program. The data confirms that the MPRS has reached the asymptotic limit for effective removal of Methylene Chloride.
- Consistent with the pending OM&M Plan, recovery through the various recovery wells has been rotated throughout the operation of the MPRS, with one of the goals of this rotation being to “pulse wells to maximize Methylene Chloride recovery rates”. This extended Pulsing Test has confirmed that the rotation of the recovery wells has, in fact, already maximized the Methylene Chloride recovery.
- The apparent increase in Methylene Chloride recovery rate at the beginning of cycles 1, 2, 3 and 4 depicted in Figures 7, 8 and 12, is skewed high due to the frequency of readings during the first 6 hours following startup. Individual vapor readings indicate that any increase in the Methylene Chloride recovery rate was of very short duration right after the system was first turned on, and typically lasted 3 hours or less (See Figure 7a).
- Following the first 3 cycles of the pulsing test, Methylene Chloride concentrations in groundwater showed an overall decrease across the site during the June sampling event. There are no signs of post remedial rebound at this point in time.
- Operations and maintenance costs for the MPRS are estimated to be \$717 per day (Based on the average labor, energy and discharge fees for all of 2008).

- The average cost vs. removal over the last six months is estimated at \$170,757 per gallon of Methylene Chloride removed. Based on Figure 15, the average estimated cost per pound of VOC removal over the last three months was in excess of \$20,000.
- Daily carbon dioxide emissions due to operation of the MPRS are estimated at 1,296 pounds per day of operation or 28,175 lbs of carbon dioxide emitted per pound of total VOC removal.
- Laboratory Analysis of Methylene Chloride levels in Tedlar bag vapor samples verified that PID measurements were within acceptable QA/QC limitations of field instrument readings during the pulsing test (Table 3).
- As shown on Table 2, two rounds (March and June 2009) of sampling at both the 23 foot and 35 foot depths within MW-R5 indicate that the bulk of the residual Methylene Chloride in the vicinity of wells RW-5, MW 20A and MW 20B remains at the shallower intermediate depth of 23 feet with virtually no measurable (i.e. above what was also found in the blanks) levels being measured at the 35 foot depth. Although even the 23 foot depth sample was "clean" during the June 2009 sample.
- The attached REEP information is a reasonable, subjective representation of the overall effectiveness/performance of the system as we are using discontinuous data and PID measurements for the removal calculations. We do not intend this tool as a definitive summary of recovered mass.

**Anticipated
Actions –
August
2009:**

- Consistent with the NYSDEC approved pulsing workplan, the MPRS will continue to be operated in an extended pulsing mode by being shut down for a period of four weeks, followed by seven days of system operation, followed by another 4 weeks of shut down. This pulsing of seven days on and four weeks off will continue until NYSDEC approves the permanent shutdown and decommissioning of the MPRS.

If you have any questions regarding this monthly report or progress on the project, please don't hesitate to contact me at 513-314-7543 or rbethel@qmg-inc.com.

Sincerely,
QUANTUM MANAGEMENT GROUP, INC.



Rick Bethel
Senior Associate

Attachments

cc:

Mr. Jeffrey M. Kosmala, P.E. (MCDOH)
Mr. Michael Bogdan (Sanofi-Aventis)
Mr. Kevin Bruno (RFBC Law)
Mr. Mark Byrne, P.E. (Town of Henrietta)
Ms. Libby Ford, (Nixon Peabody)
Mr. Joseph Hausbeck, Esq. (NYSDEC)
Mr. George Hollerbach, P.E. (Quantum)

Ms. Melissa Menetti (NYSDOH)
Mr. David Panipinto (UCB)
Mr. Bart Putzig, P.E. (NYSDEC)
Mr. Sean Keenan (MCDES)
Mr. John Lang, P.E. (Quantum)
Mr. Greg Light (UCB)

Tables

TABLE 1 - TREATED WASTE WATER FLOW/VAPOR MONITORING DATA
MCA REMEDIATION SYSTEM
755 JEFFERSON ROAD, HENRIETTA, NEW YORK
NYSDEC VCP NUMBER V00126-8
Pulsing Period April 13 through July 6, 2009

Date	Time ¹	Cumulative Hours ²	Total Flow ³ Gallons	Flow Rate ⁴ Gal/Min	Cumulative Gallons ^{5,6}	Influent PID (ppm)	Effluent PID (ppm)
4/13/2009	10:30	38084	262	1.4	280,269	0.0	0.0
4/13/2009	10:45	38084	8	0.9	280,277	13.0	0.0
4/13/2009	11:00	38084	24	1.7	280,301	6.0	0.0
4/13/2009	11:15	38084	15	1.3	280,316	6.7	0.0
4/13/2009	11:30	38085	11	0.8	280,327	10.4	0.0
4/13/2009	11:45	38085	22	1.4	280,349	6.7	0.0
4/13/2009	12:00	38085	23	2.3	280,372	21.2	0.0
4/13/2009	12:15	38085	27	1.3	280,399	9.8	0.0
4/13/2009	1:15	38086	72	1.4	280,471	7.2	0.0
4/13/2009	1:44	38087	42	1.3	280,513	2.2	0.0
4/13/2009	2:15	38087	19	0.7	280,532	0.0	0.0
4/13/2009	3:15	38088	50	1.0	280,582	0.0	0.0
4/13/2009	4:15	38089	60	0.9	280,642	0.0	0.0
4/14/2009	9:25	38107	620	0.6	281,262	2.5	0.0
4/15/2009	9:14	38130	566	0.4	281,828	1.2	0.0
4/17/2009	9:22	38179	873	0.3	282,701	1.0	0.0
4/20/2009	11:18	38232	818	0.3	283,519	2.8	0.0
4/27/2009	9:45	38234	161	1.4	283,680	0.0	0.0
4/27/2009	10:00	38234	20	1.6	283,700	0.0	0.0
4/27/2009	10:15	38235	19	1.4	283,719	0.0	0.0
4/27/2009	10:30	38235	11	0.6	283,730	1.5	0.0
4/27/2009	10:45	38235	22	1.5	283,752	1.6	0.0
4/27/2009	11:00	38235	0	0.0	283,752	0.0	0.0
4/27/2009	11:15	38236	11	0.7	283,763	0.0	0.0
4/27/2009	11:30	38236	17	1.1	283,780	0.0	0.0
4/27/2009	12:30	38237	49	0.8	283,829	0.0	0.0
4/27/2009	12:40	38237	14	0.9	283,843	0.0	0.0
4/27/2009	1:30	38238	30	0.6	283,873	0.0	0.0
4/27/2009	2:30	38239	30	0.5	283,903	0.0	0.0
4/27/2009	3:30	38240	49	0.8	283,952	0.0	0.0
4/28/2009	9:38	38258	617	0.6	284,569	2.4	0.0
4/29/2009	10:18	38263	243	0.8	284,812	1.0	0.0
4/29/2009	11:18	38264	35	0.6	284,847	0.0	0.0
5/1/2009	9:14	38294	797	0.4	285,644	0	0
5/4/2009	9:38	38366	1,134	0.3	286,778	2.1	0
5/18/2009	9:45	38368	176	1.7	286,954	NA	NA
5/18/2009	10:00	38368	29	2.1	286,983	3	1.9
5/18/2009	10:15	38368	8	0.8	286,991	2.2	1.7
5/18/2009	10:30	38368	28	1.7	287,019	2.5	1.6
5/18/2009	10:45	38369	14	0.8	287,033	2	1.2
5/18/2009	11:00	38369	24	1.6	287,057	2.2	1.2
5/18/2009	11:15	38369	12	1.0	287,069	1.6	0.7
5/18/2009	11:30	38369	12	1.1	287,081	2	0.9
5/18/2009	12:30	38371	57	0.9	287,138	2.2	0.7
5/18/2009	1:05	38371	42	1.0	287,180	1.6	0.4
5/18/2009	1:30	38371	17	0.9	287,197	0.8	0
5/18/2009	2:30	38372	47	0.8	287,244	0.6	0.3
5/18/2009	3:30	38374	44	0.7	287,288	0.7	0
5/19/2009	9:14	38391	578	0.5	287,866	1.8	0.4
5/20/2009	9:24	38415	768	0.5	288,634	1.6	0.8
5/22/2009	9:34	38464	751	0.3	289,385	1.2	0.4
5/26/2009	9:13	38559	719	0.1	290,104	1.8	0.6
6/29/2009	7:45	38563	343	1.4	290,447	0.3	0.0
6/29/2009	8:00	38564	64	3.8	290,511	0.0	0.0
6/29/2009	8:15	38564	16	0.9	290,527	0.0	0.0
6/29/2009	8:30	38564	26	1.9	290,553	0.0	0.0
6/29/2009	8:45	38564	26	1.5	290,579	0.0	0.0
6/29/2009	9:00	38565	18	1.3	290,597	0.0	0.0
6/29/2009	9:15	38565	36	2.1	290,633	0.0	0.0
6/29/2009	9:30	38565	16	1.2	290,649	0.0	0.0
6/29/2009	10:30	38566	88	1.5	290,737	0.0	0.0
6/29/2009	11:30	38567	89	1.4	290,826	0.0	0.0
6/29/2009	12:30	38568	66	1.4	290,892	0.0	0.0
6/29/2009	1:30	38569	106	1.3	290,998	0.0	0.0
6/30/2009	9:01	38589	1,066	0.9	292,064	0.2	0.0
7/1/2009	8:58	38612	1,117	0.8	293,181	0.7	0.0
7/2/2009	12:52	38640	1,140	0.7	294,321	0.2	0.0
7/6/2009	9:06	38733	2,680	0.5	297,001	0.7	0.0

² Cumulative Hours represents the number of run-hours since MCA remediation system start-up on 12 July 200

³ Total Flow in

⁴ Flow Rate in

⁵ Cumulative Gallons

⁶ Totalizer Flow

⁷ n/a: data not available

Table 2
MONITORING WELL GAUGING AND GROUNDWATER ANALYTICAL DATA

UCB Facility
755 Jefferson Road
Rochester, New York

Sample ID	Date	TOC Elevation	Depth to Water	Corrected Water Table Elevation	Acetone	Methyl Ethyl Ketone	Dichloro- difluoro- ethane	cis-1,2- Dichloro ethene	Ethyl acetate	Isopropyl acetate	n-Amyl Acetate	Total Xylenes	Benzene	Chloro form	Chloro- thane	1,1- Dichloro ethylene	trans-1,2- Dichloro ethene	Carbon Disulfide	Methylene chloride	
NYSDEC Standards				50	50	5	5	5	5	5	5	1	7	5	5	5	5	50	5	
RW-5 (Recovery well, gauge & sample)	8/26/2003	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	0.54 J	NA	BRL	NA	120
	9/12/2005	NG	NG	NG	BRL	NA	NA	NA	NA	NA	NA	BRL	NA	NA	NA	NA	NA	NA	NA	BRL
	2/23/2007	NG	NG	NG	BRL	BRL	NA	BRL	BRL	BRL	NA	BRL	BRL	BRL	BRL	BRL	NA	NA	NA	BRL
	6/20/2007	547.27	22.66	524.61	<25	<25	<5.0	<5.0	<5.0	<5.0	NA	<15	<5.0	<5.0	5.3	<5.0	<5.0	NA	NA	45,000 D
	9/20/2007	547.27	28.97	518.30	<250	<250	NA	<50	<50	<50	NA	<150	<50	<50	<50	<50	NA	NA	NA	1,000
	12/18/2007	547.27	3.05	544.22	<250	<250	<50	<50	<50	<50	<50	<150	<50	<50	<50	<50	<50	<50	<50	770
	3/17/2008	547.27	14.13	537.28	320	<250	<50	<50	<50	<50	<50	<150	<50	<50	<50	<50	<50	<50	<50	530
	6/4/2008	547.27	46.08	514.09	<250	<250	<50	<50	<50	<50	<50	<150	<50	<50	<50	<50	<50	<50	<50	410
	9/10/2008	547.27	41.68	517.80	<12,000	<12,000	<2,500	<2,500	<2,500	<2,500	<2,500	<2,500	<2,500	<2,500	<2,500	<2,500	<2,500	<2,500	<2,500	25,000
	12/17/2008	547.27	9.99	540.21	<2,500	<2,500	<500	<500	<500	<500	<500	<1,500	<500	<500	<500	<500	<500	<500	<500	6,600
35	3/23/2009	547.27	45.36	501.91	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	22 B
	6/19/2009	547.27			<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<1.1	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	2.2 J.B
23	3/23/2009	547.27	45.36	501.91	<2500	<2500	<500	<500	<500	<500	<500	<1,000	<500	<500	<500	<500	<500	<500	<500	8,900 D
	6/19/2009	547.27			<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	0.94 J.B
RW-6 (Recovery well, gauge & sample)	8/26/2003	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	NA	140,000
	9/9/2005	NG	NG	NG	5	NA	NA	NA	NA	NA	NA	BRL	BRL	NA	NA	NA	NA	NA	NA	3,300 D
	2/22/2007	NG	NG	NG	BRL	BRL	NA	BRL	BRL	BRL	NA	BRL	BRL	BRL	BRL	NA	NA	NA	NA	BRL
	6/20/2007	547.89	12.71	535.18	<25	<25	<5.0	<5.0	<5.0	<5.0	NA	<15	<5.0	<5.0	<5.0	<5.0	<5.0	NA	NA	<5.0
	9/20/2007	547.89	17.40	530.49	<25	<25	NA	<5.0	<5.0	<5.0	NA	<15	<5.0	<5.0	<5.0	<5.0	<5.0	NA	NA	<5.0
	12/19/2007	547.89	1.62	544.71	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<15	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
	3/18/2008	547.89	4.58	543.81	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<15	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
	6/4/2008	547.89	36.96	514.96	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<15	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
	9/11/2008	547.89	37.58	514.41	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<15	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
	12/17/2008	547.89	38.38	512.80	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
3/23/2009	547.89	7.91	539.98	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	

Notes:
 <1.0 - Not detected at or above the laboratory reporting limit shown.
 Corrected Water Table Elevation - Determined by trigonometry for wells MW-D9, MW-D11 to MW-D13, and RW-4 to RW-6
 All units reported in µg/L - micrograms per liter (parts per billion)
 All wells gauged on June 18, 2007
 BRL - Below laboratory reporting limits
 BTEX - benzene, toluene, ethylbenzene, and total xylenes
 B - analyte found in the associated blank, as well as in the sample
 D - Surrogate recovery unreportable due to dilution.
 J - The reported concentration is estimated (the result is less than the sample quantitation limit but greater than zero)
 * - Sample results are from a pumping test
 NA - not analyzed
 NG - not gauged/or data not available
 NS - not sampled
 DRY - Insufficient water to gauge or sample

TABLE 3- Field PID Measurement vs. Tedlar Bag/Lab Analyses Comparison Table
MCA REMEDIATION SYSTEM
755 JEFFERSON ROAD, HENRIETTA, NEW YORK
NYSDEC VCP NUMBER V00126-8
Pulsing Period April 13 through July 6, 2009

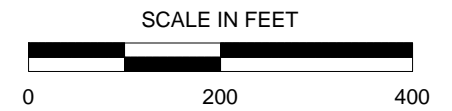
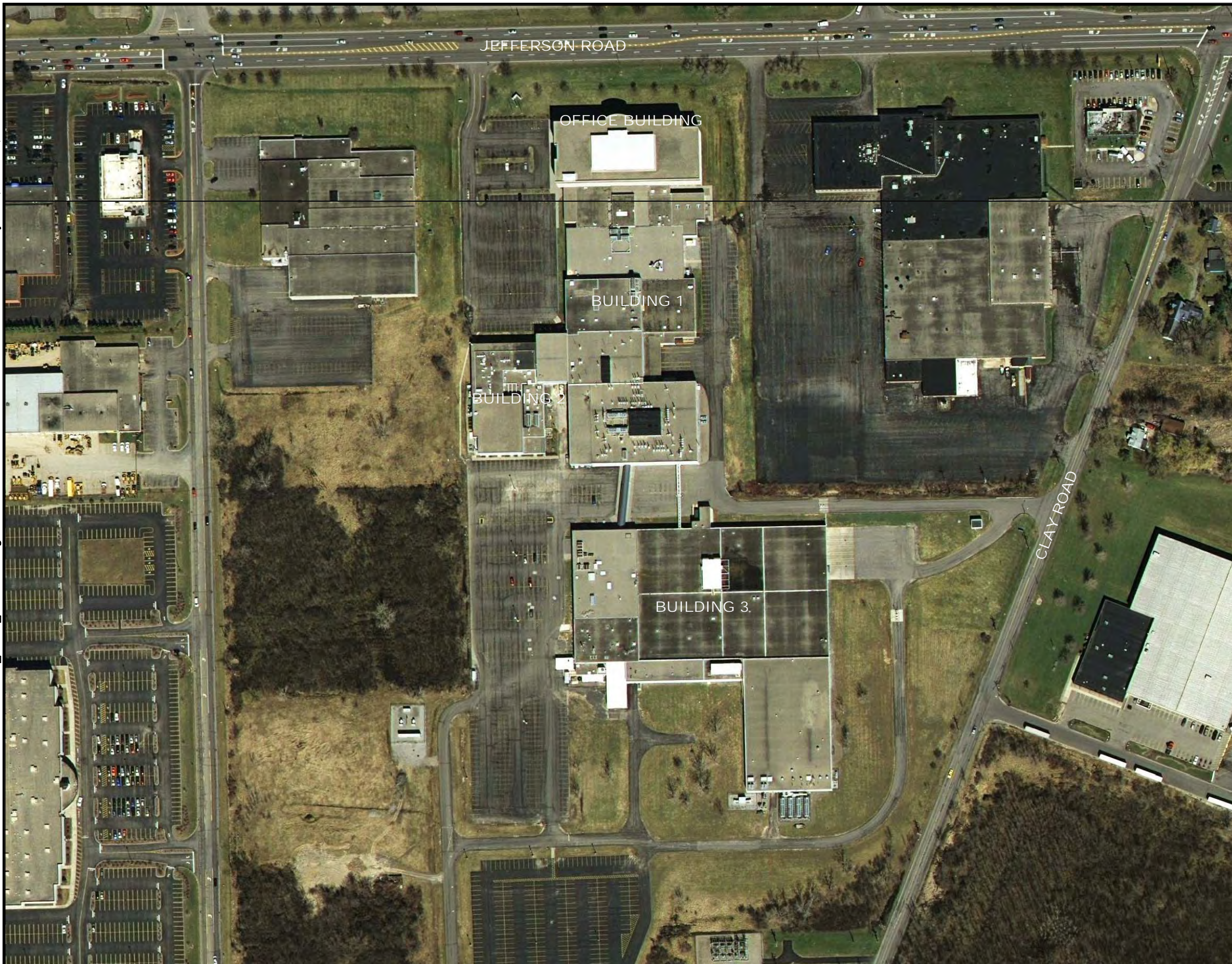
Location	Date	Time	PID (ppm)	Lab Analysis (ppm)
MW-D8	4/13/2009	14:00	15.9	36.85
MW-D8	4/27/2009	12:30	0.8	5.7
MW-D8	5/18/2009	12:30	9.4	6.6
MW-D8	6/29/2009	10:30	0.8	2.4

Figures

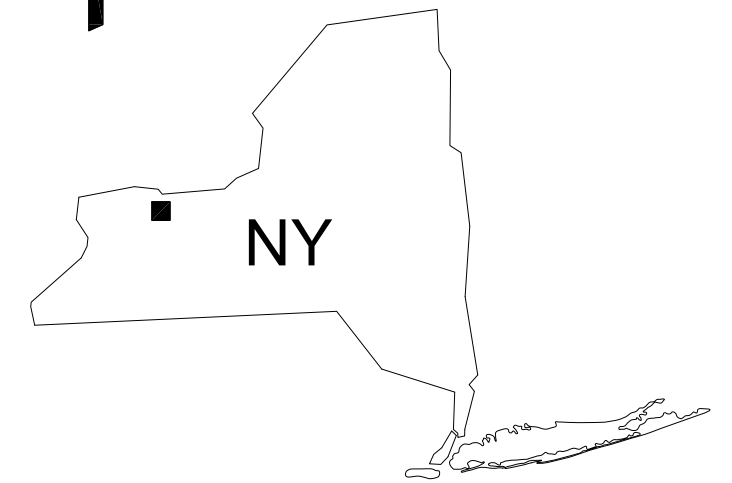
PLOTTED: 15 May 2009, 10:17am, J.Lubbers

CAD FILE: G:\CAD\Sanofi\JEFFERSON_ROAD_FACILITY.dwg LAYOUT: FIG-1

NEWBURGH, NY



LATITUDE: 43° 05' 03" N
 LONGITUDE: 77° 37' 19" W



SITE LOCATION

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REFERENCES:

1. AERIAL IMAGES "w_14041124_12_09000_col_20051.sid" AND "w_14041126_12_09000_col_20051.sid" © NYS CLEARING HOUSE.
2. KLEINFELDER FIELD RESEARCH.



PROJECT NO. 84774
 DRAWN: 05/13/2009
 DRAWN BY: JL
 CHECKED BY: AW
 FILE NAME: SANOFI_SITEPLAN.dwg

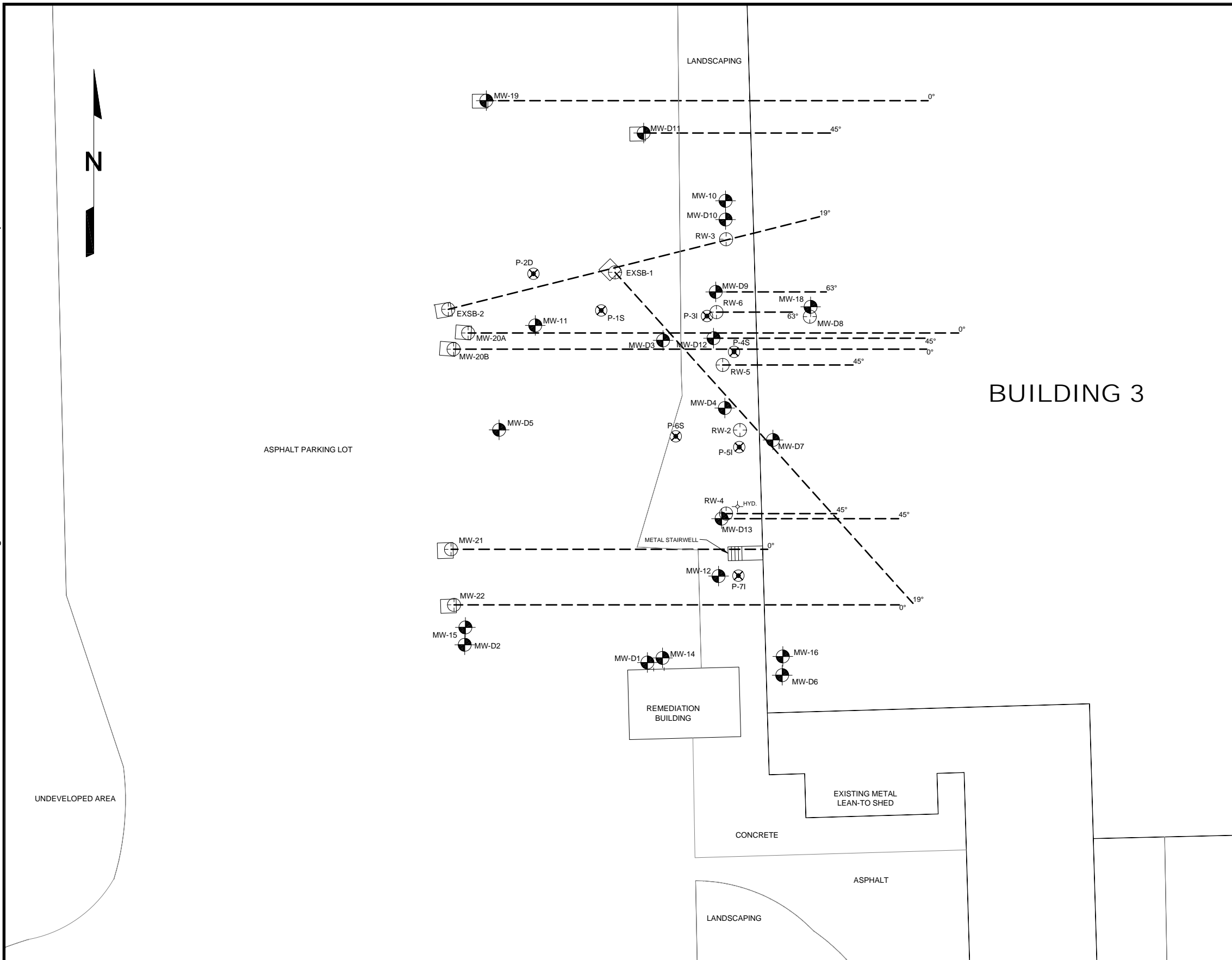
AREA MAP

UCB FACILITY
 NYSDEC VCP# V00126-8
 755 JEFFERSON ROAD
 ROCHESTER

MONROE COUNTY NEW YORK

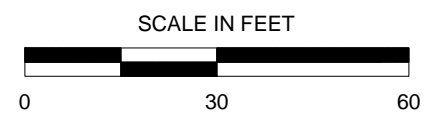
FIGURE

1



LEGEND

- MONITORING WELL
- RECOVERY WELL
- PIEZOMETER
- VAULT
- FIRE HYDRANT
- ANGLD WELL (ANGLE MEASURED FROM GROUND SURFACE)



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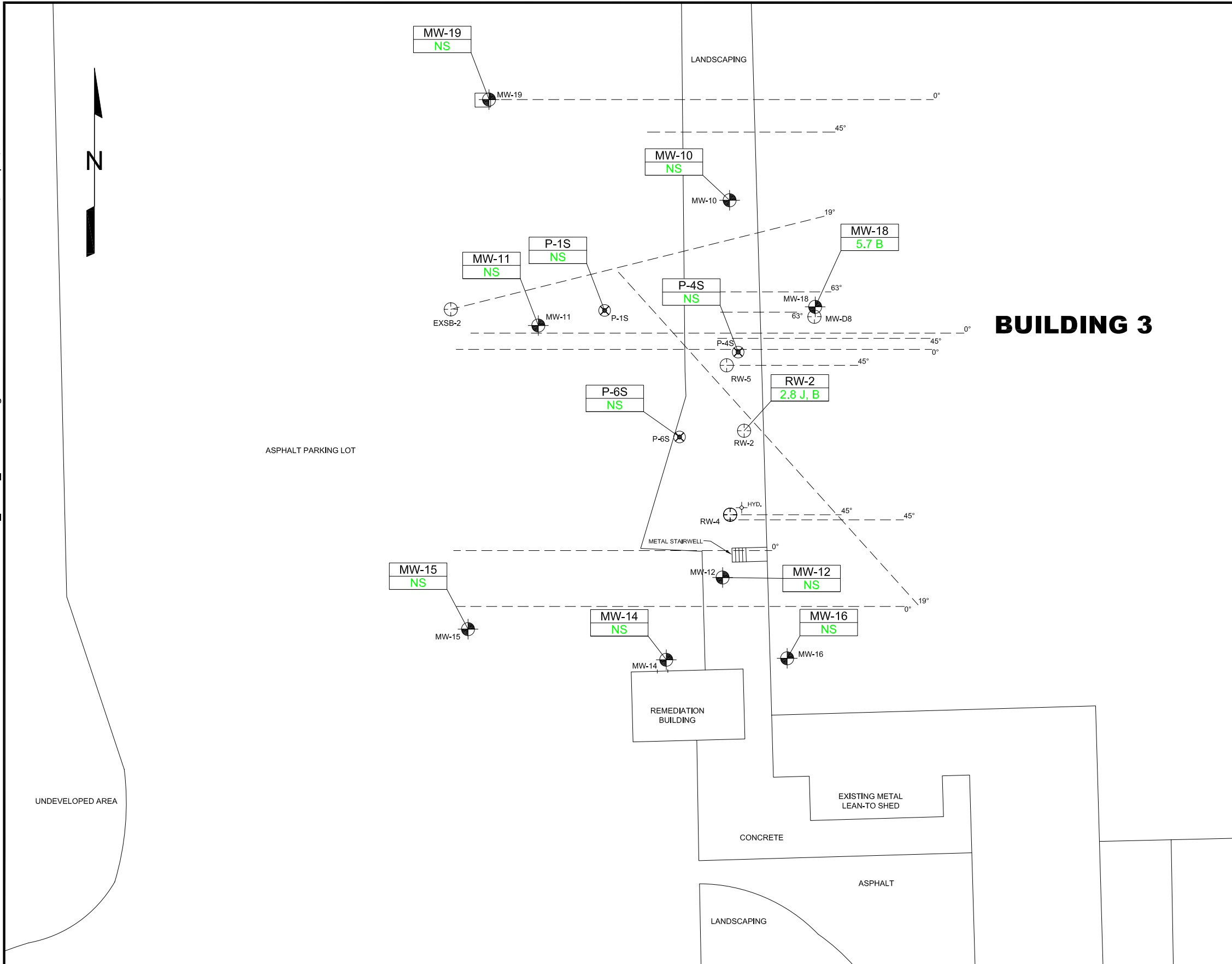
- REFERENCES:
- "WELL LOCATION MAP" PREPARED BY ERM, DATED SEPTEMBER, 2006.
 - KLEINFELDER FIELD RESEARCH.



PROJECT NO.	84774
DRAWN:	05/13/2009
DRAWN BY:	JL
CHECKED BY:	AW
FILE NAME:	SANOFI_SITEPLAN.dwg

SITE PLAN	
UCB FACILITY NYSDEC VCP# V00126-8 755 JEFFERSON ROAD ROCHESTER	
MONROE COUNTY	NEW YORK

FIGURE
2

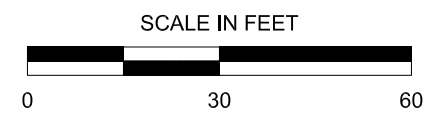


LEGEND

- MONITORING WELL
- RECOVERY WELL
- PIEZOMETER
- VAULT
- FIRE HYDRANT
- ANGLED WELL (ANGLE MEASURED FROM GROUND SURFACE)

MONITORING WELL IDENTIFICATION METHYLENE CHLORIDE (µg/L)

- 5.7 B** MONITORING WELL IDENTIFICATION METHYLENE CHLORIDE (µg/L)
- µg/L** MICROGRAMS PER LITER
- NS** NOT SAMPLED
- B** ANALYTE FOUND IN THE ASSOCIATED BLANK, AS WELL AS IN THE SAMPLE
- J** THE REPORTED CONCENTRATION IS ESTIMATED



- NOTES:**
- GROUNDWATER MONITORING WELLS WERE SAMPLED JUNE 19, 2009.
 - MONITORING WELLS MW-10, MW-11, MW-12, MW-14, MW-15, MW-16 AND MW-19 AND PIEZOMETERS P-1S, P-4S AND P-6S WERE NOT SAMPLED.

- REFERENCES:**
- "WELL LOCATION MAP" PREPARED BY ERM, DATED SEPTEMBER, 2006.
 - KLEINFELDER FIELD RESEARCH.

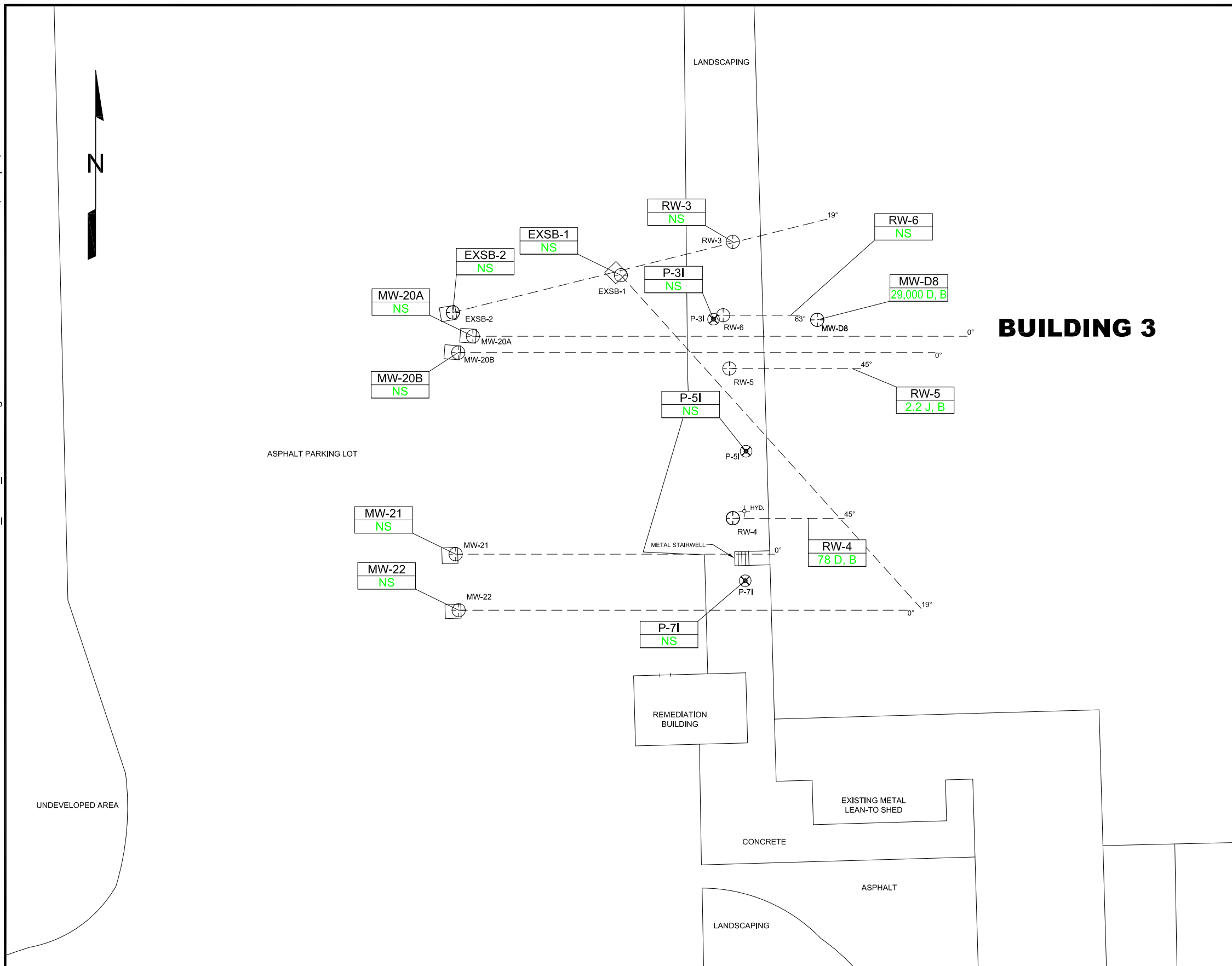
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GROUNDWATER CONCENTRATION MAP SHALLOW WELLS

UCB FACILITY
 NYSDEC VCP# V00126-8
 755 JEFFERSON ROAD
 ROCHESTER

MONROE COUNTY NEW YORK



LEGEND

	RECOVERY WELL
	PIEZOMETER
	VAULT
	FIRE HYDRANT
	ANGLED WELL (ANGLE MEASURED FROM GROUND SURFACE)
	MONITORING WELL IDENTIFICATION METHYLENE CHLORIDE (µg/L)
µg/L	MICROGRAMS PER LITER
NS	NOT SAMPLED
D	SURROGATE RECOVERY UNREPORTABLE DUE TO DILUTION
B	ANALYTE FOUND IN THE ASSOCIATED BLANK, AS WELL AS IN THE SAMPLE
J	THE REPORTED CONCENTRATION IS ESTIMATED

SCALE IN FEET

- NOTES:**
- GROUNDWATER MONITORING WELLS WERE SAMPLED JUNE 19, 2009.
 - RECOVERY WELLS RW-3, RW-6, MW-20A, MW-20B, MW-22, EXSB-1 AND EXSB-2 AND PIEZOMETERS P-3I, P-5I AND P-7I WERE NOT SAMPLED.

- REFERENCES:**
- "WELL LOCATION MAP" PREPARED BY ERM, DATED SEPTEMBER, 2006.
 - KLEINFELDER FIELD RESEARCH.

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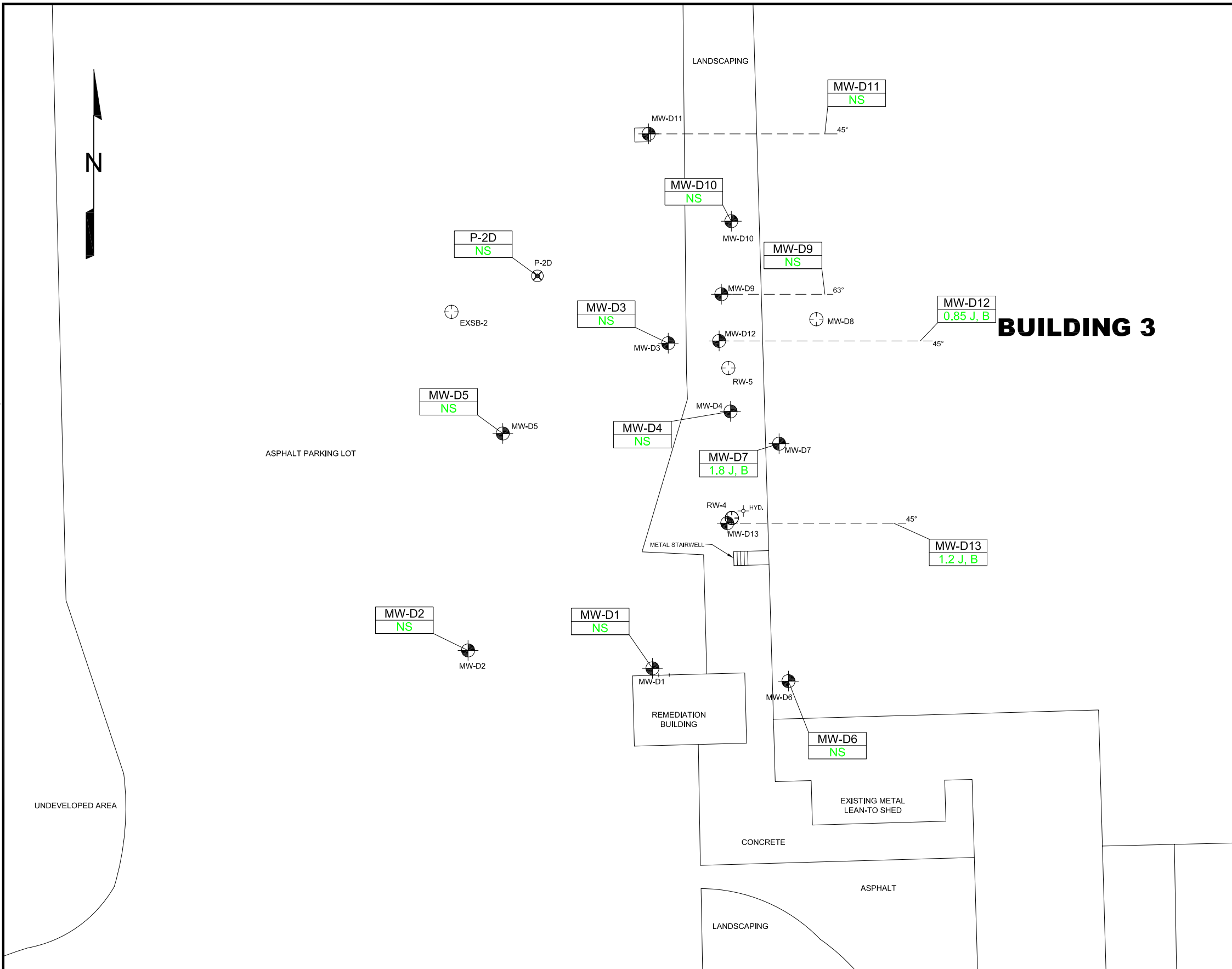
PROJECT NO.	84774
DRAWN:	07/15/09
DRAWN BY:	CTH
CHECKED BY:	AW
FILE NAME:	SANOFL_SITEPLAN.dwg

**GROUNDWATER CONCENTRATION MAP
INTERMEDIATE WELLS**

UCB FACILITY
NYSDEC VCP# V00126-8
755 JEFFERSON ROAD
ROCHESTER

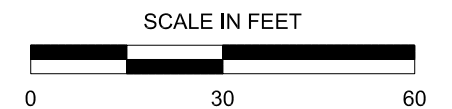
MONROE COUNTY NEW YORK

FIGURE
4



LEGEND

- MONITORING WELL
- PIEZOMETER
- RECOVERY WELL
- VAULT
- FIRE HYDRANT
- ANGLED WELL (ANGLE MEASURED FROM GROUND SURFACE)
- MONITORING WELL IDENTIFICATION METHYLENE CHLORIDE (µg/L)
- µg/L MICROGRAMS PER LITER
- NS NOT SAMPLED
- B ANALYTE FOUND IN THE ASSOCIATED BLANK, AS WELL AS IN THE SAMPLE
- J THE REPORTED CONCENTRATION IS ESTIMATED



NOTES:

1. GROUNDWATER MONITORING WELLS WERE SAMPLED JUNE 19, 2009.
2. MONITORING WELLS MW-D1, MW-D2, MW-D3, MW-D4, MW-D5, MW-D6, MW-D9, MW-D10 AND MW-D11 AND PIEZOMETER P-2D WERE NOT SAMPLED.

REFERENCES:

1. "WELL LOCATION MAP" PREPARED BY ERM, DATED SEPTEMBER, 2006.
2. KLEINFELDER FIELD RESEARCH.

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DRAWN BY:	CTH
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FILE NAME:	SANOFI_SITEPLAN.dwg

GROUNDWATER CONCENTRATION MAP DEEP WELLS

UCB FACILITY
 NYSDEC VCP# V00126-8
 755 JEFFERSON ROAD
 ROCHESTER
 MONROE COUNTY NEW YORK

FIGURE

5

Figure 6

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
Pulsing Test

Total VOC Mass Removed (Vapor and Ground Water Combined)

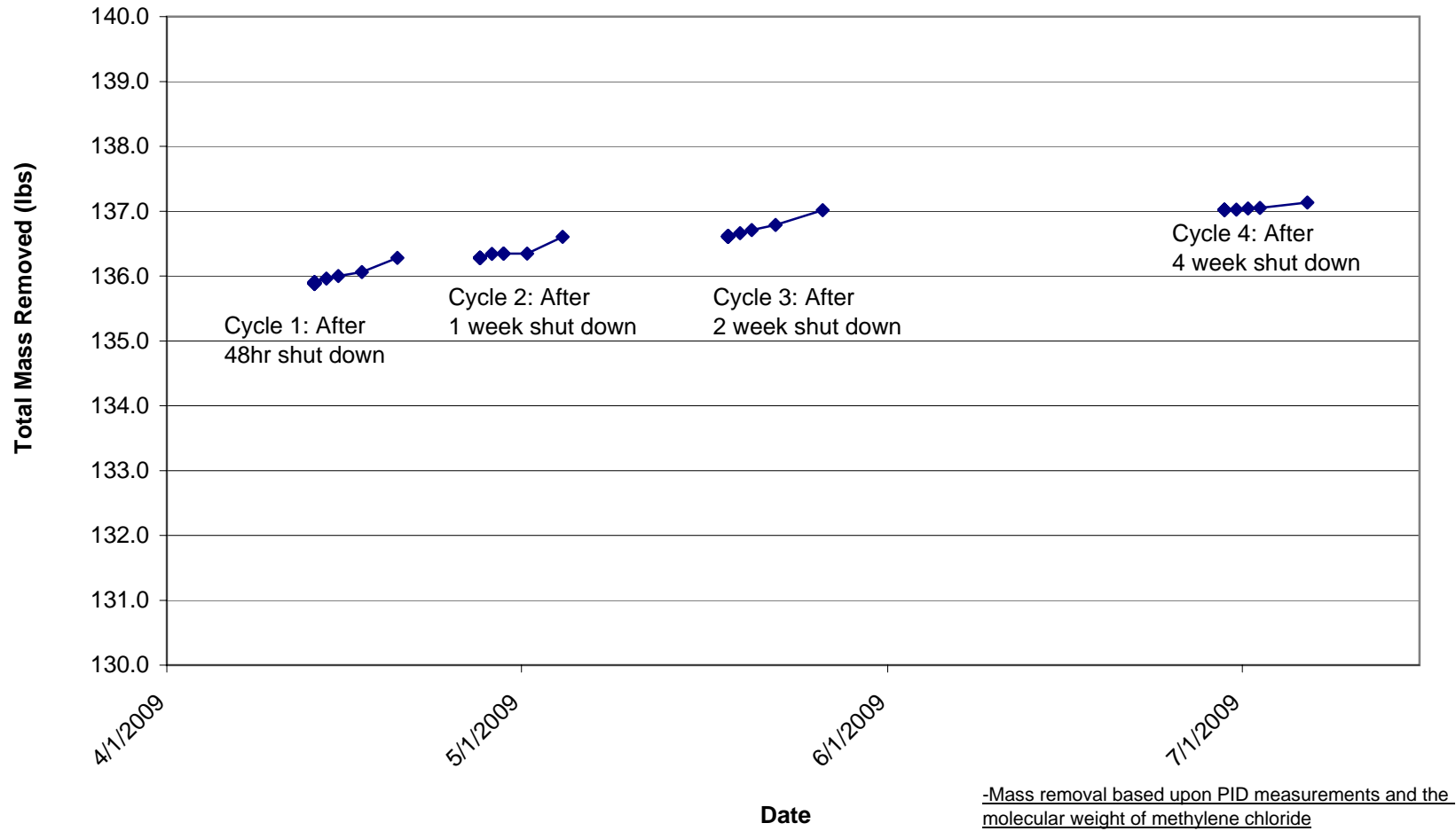


Figure 7

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
Pulsing Test

Total VOC Mass Removal Rate (Vapor & Ground Water Combined)

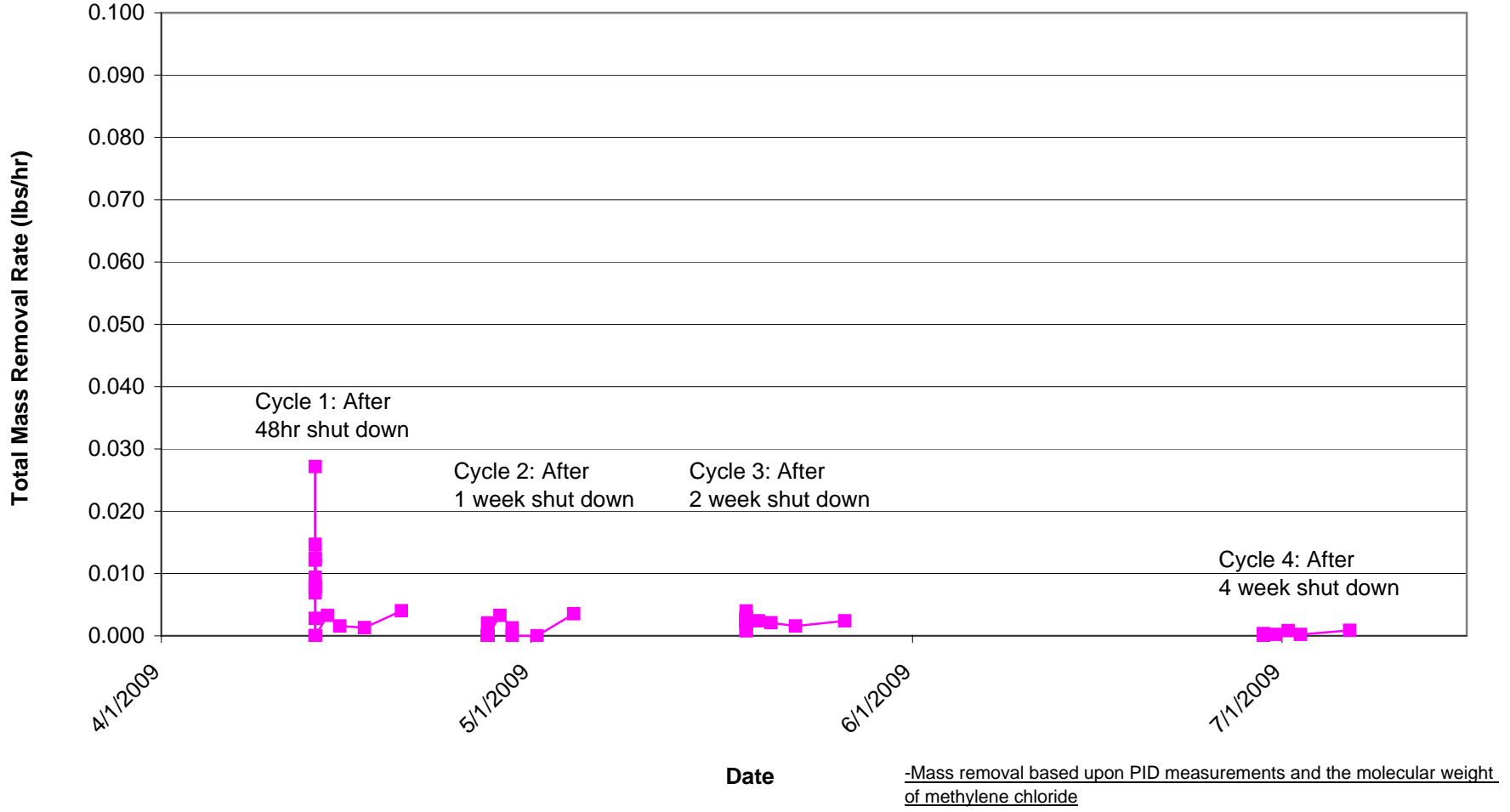


Figure 7a

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
Pulsing Test

Total VOC Mass Removal Rate (Vapor & Ground Water Combined) Cycle 1- First Day Detail

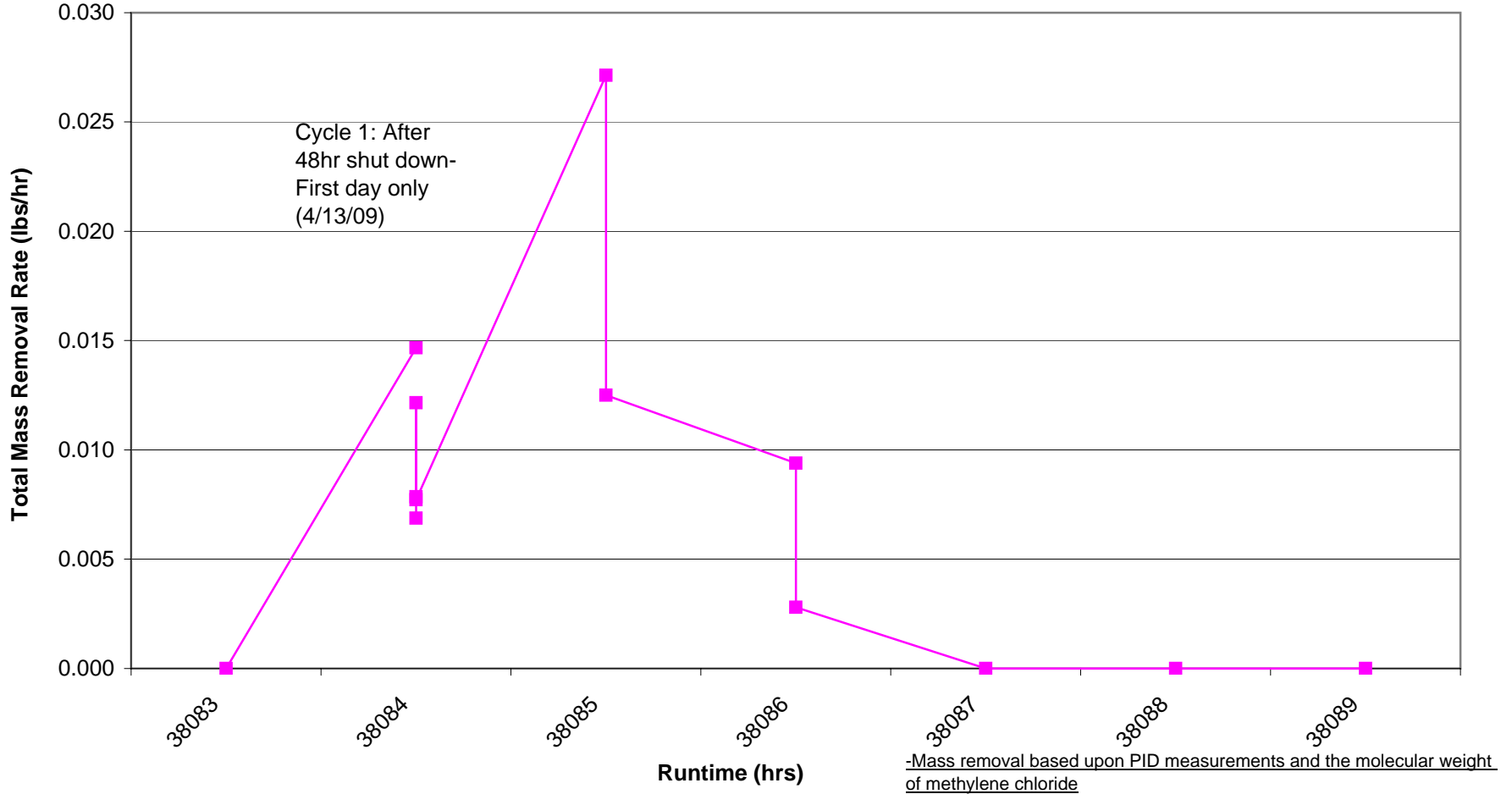


Figure 8

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
Pulsing Test

Vapor Mass Removal Rate

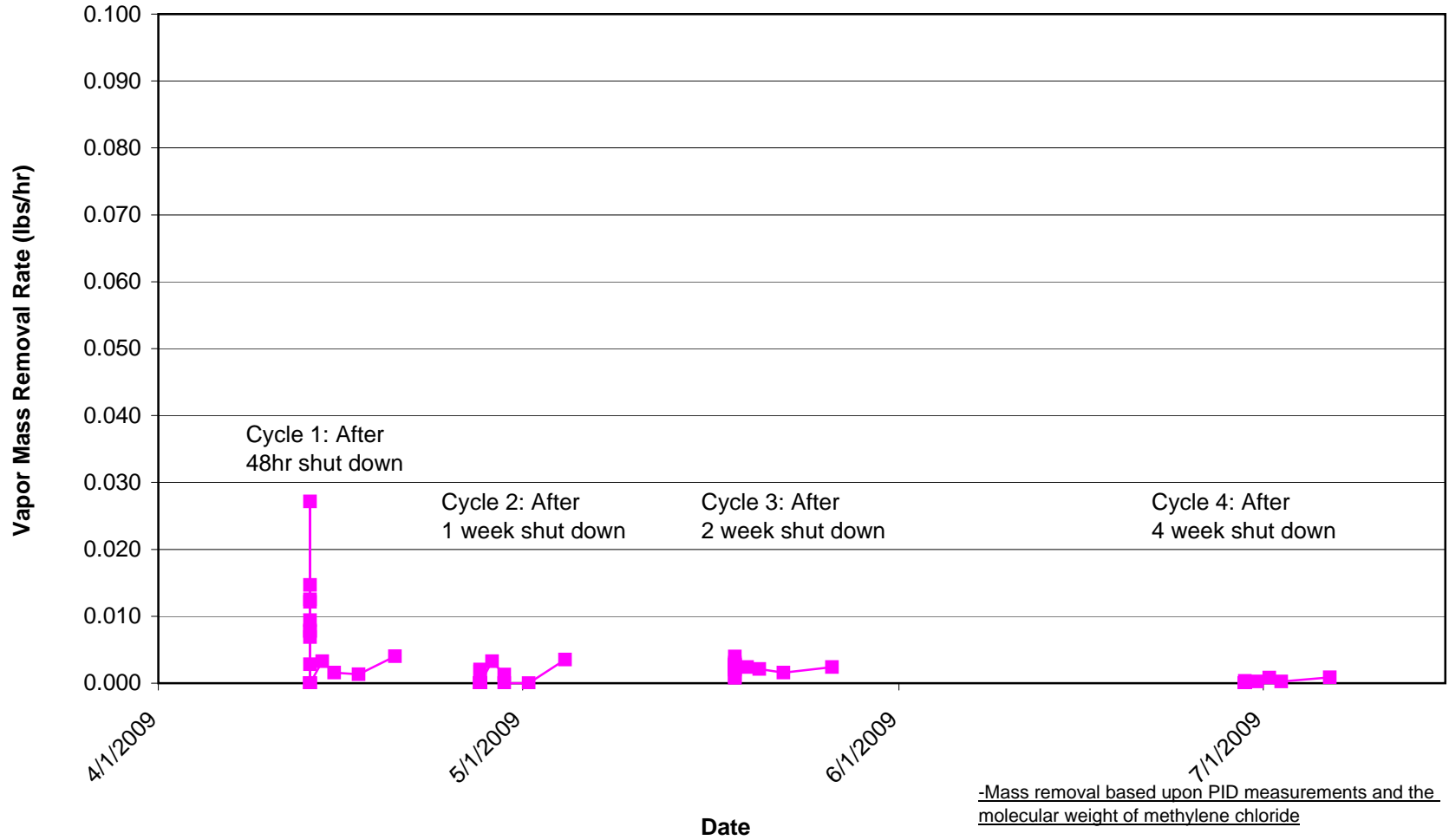


Figure 9

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
Pulsing Test

System Vacuum

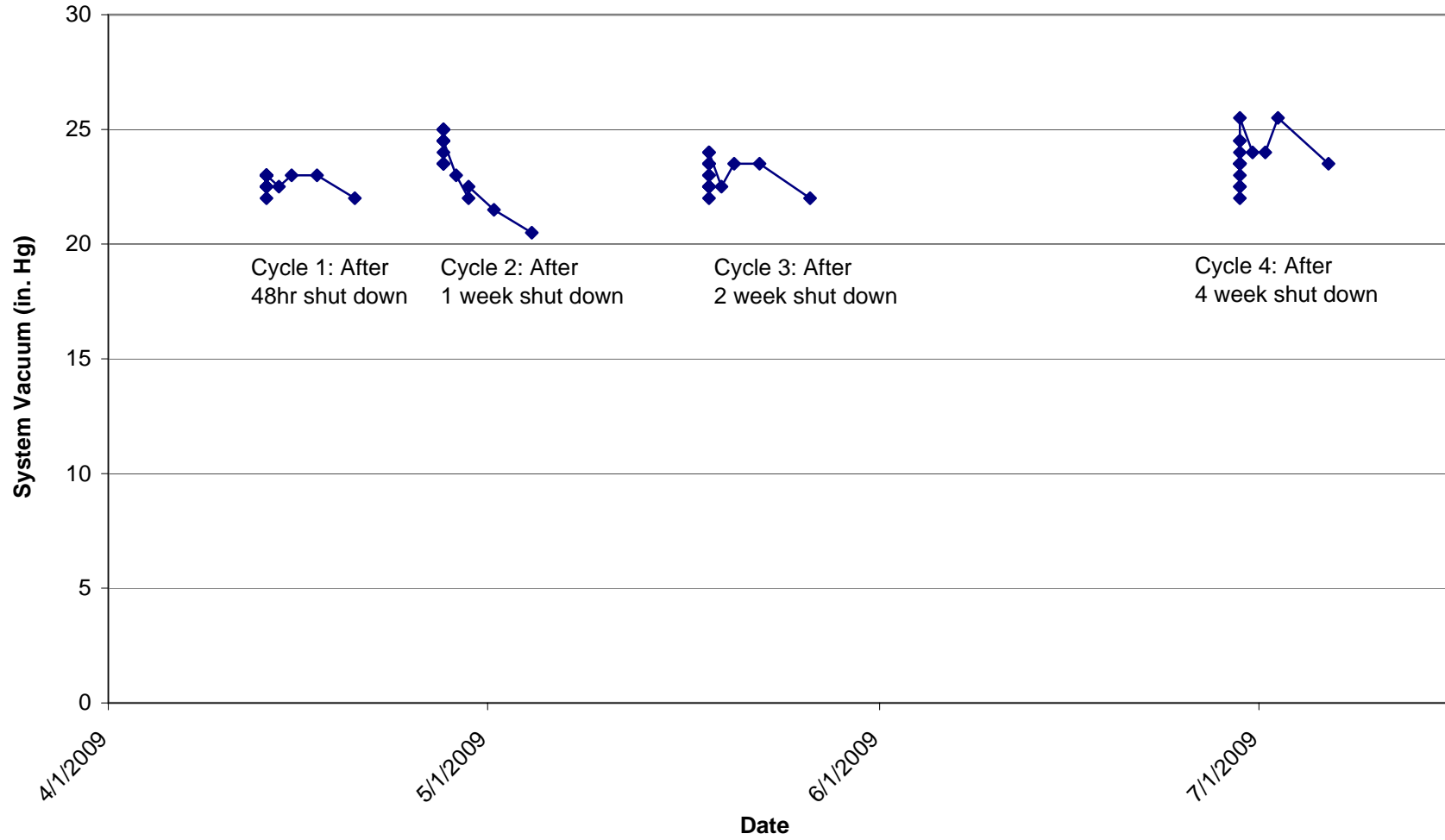


Figure 10

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
Pulsing Test

System Vapor Flow Rate

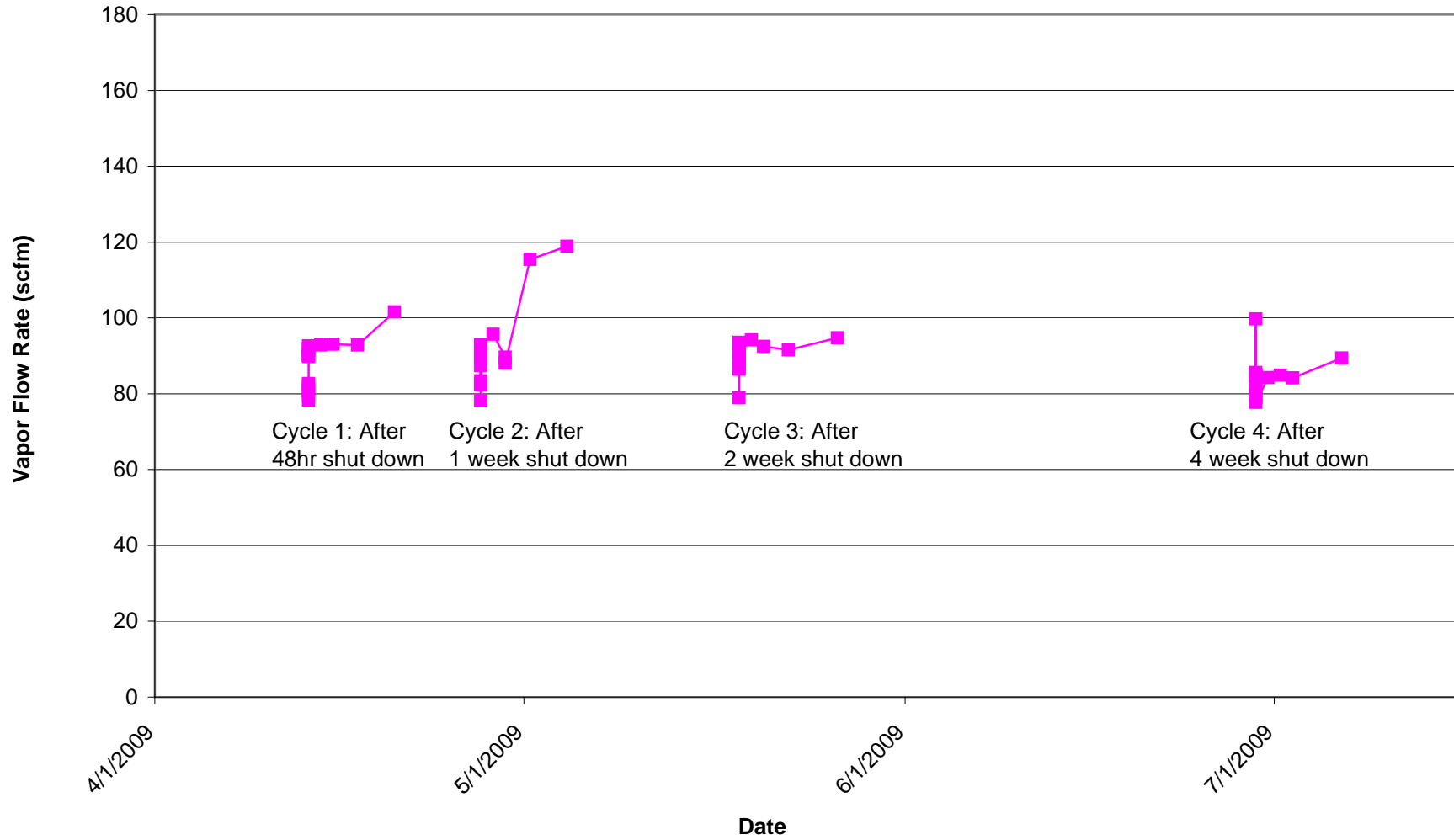


Figure 11

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
Pulsing Test

Total MeCl Mass Removed (Ground Water)

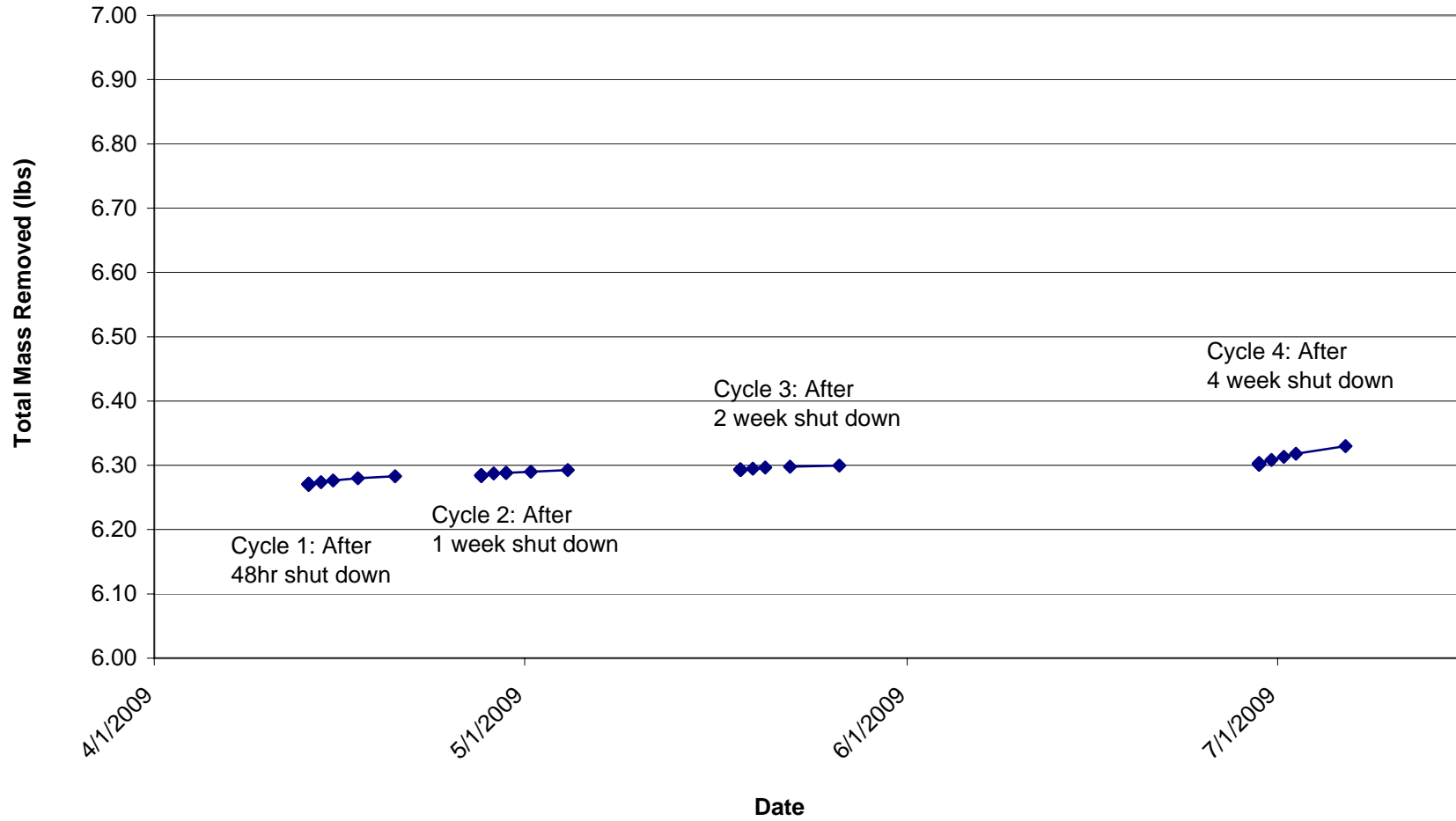


Figure 12

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
Pulsing Test

MeCl Mass Removal Rate (Ground Water)

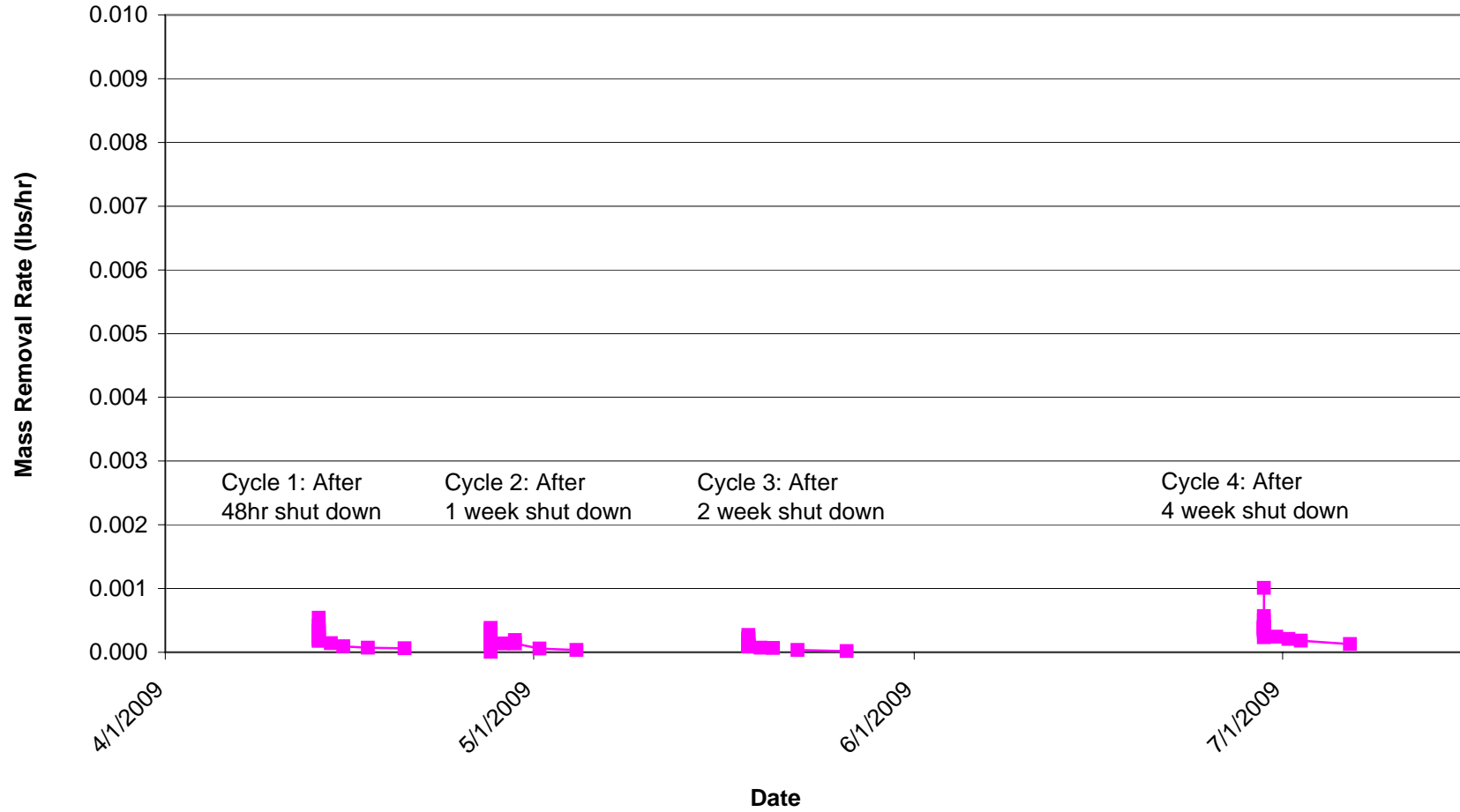
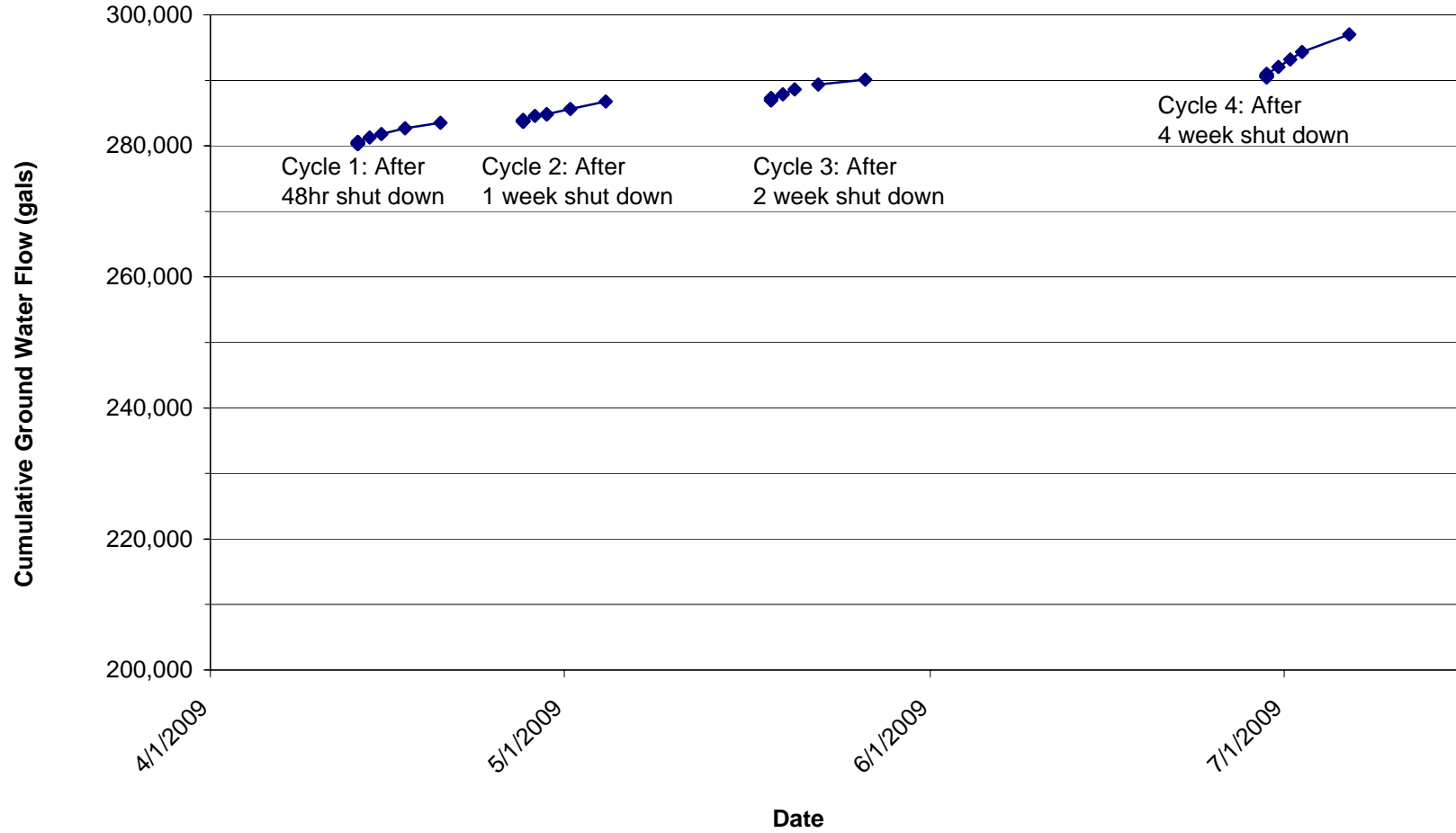


Figure 13

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
Pulsing Test

Cumulative Ground Water Flow



-Down time greater than 7 days identified on chart

Figure 14

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
Pulsing Test

Ground Water Recovery Rate

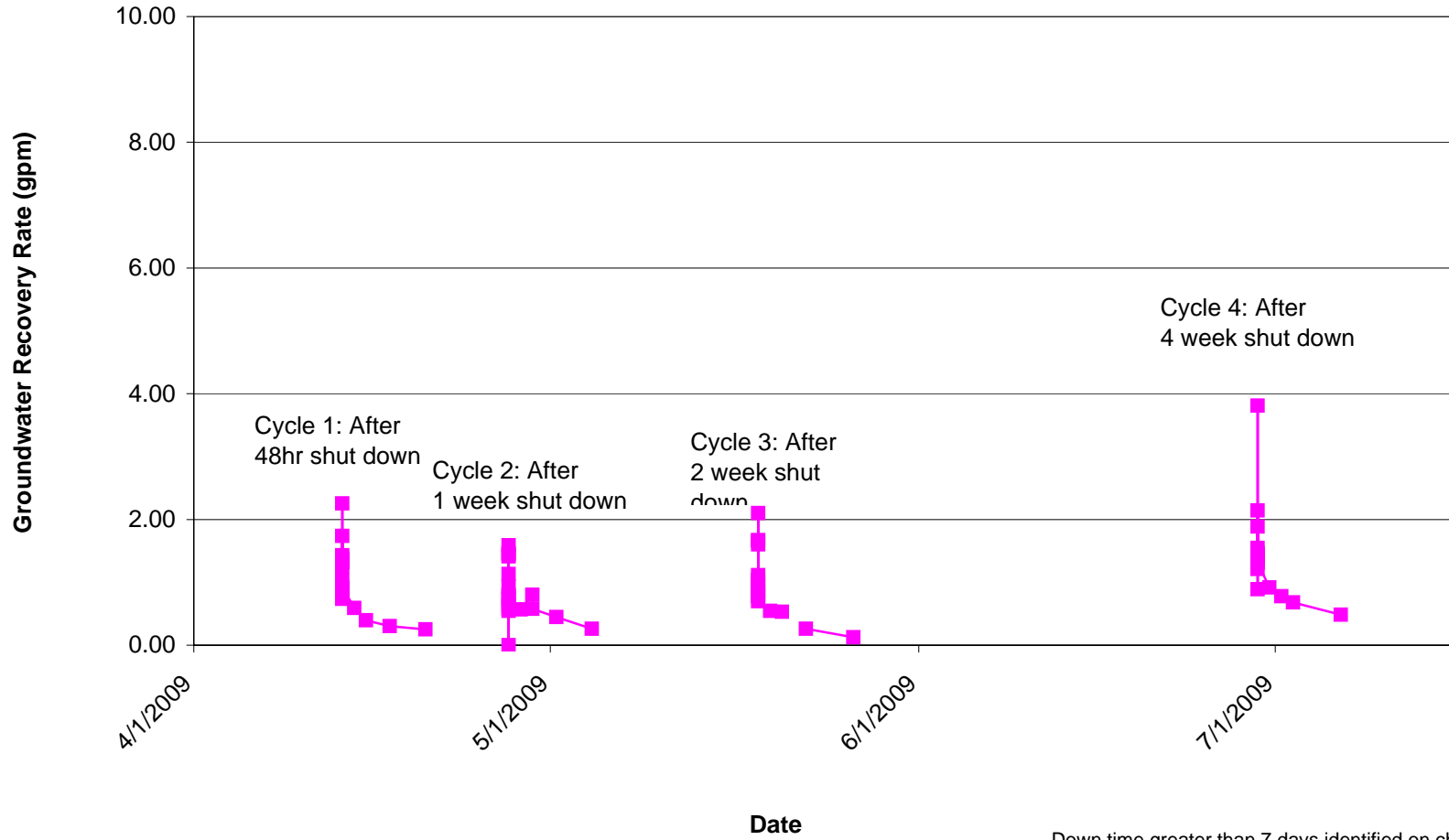
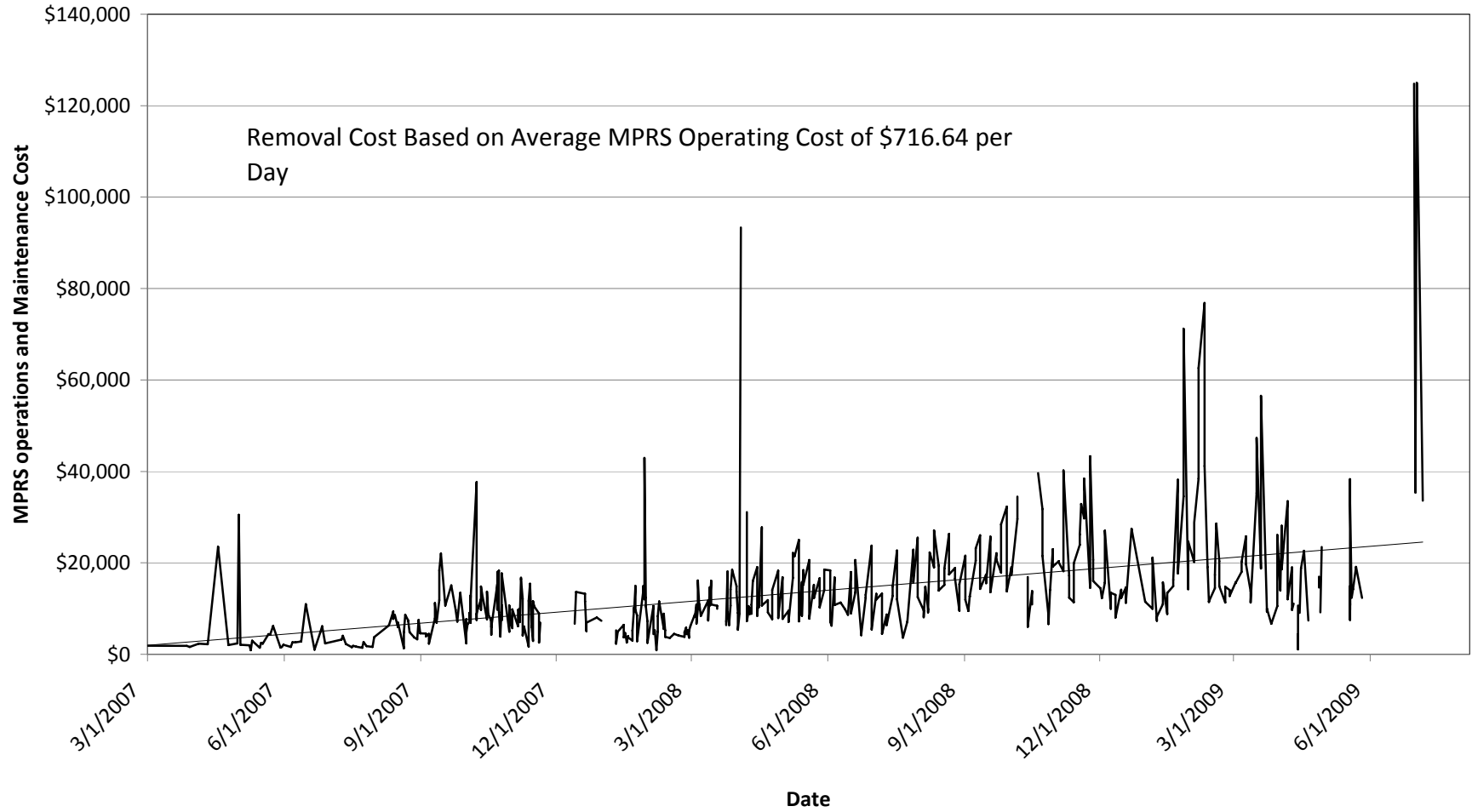


Figure 15

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
Pulsing Test

Estimated Cost (in Dollars) per Pound of Total VOC Removal



Appendix A

- MW-D8 vapor sampling analytical data associated with the NYSDEC pulsing activities.

Documents Submitted:

- Monthly Progress Report for May 2009 dated June 10, 2009.

Anticipated Actions – July 2009:

- Continue NYSDEC approved pulsing program until permission is granted to terminate system operation.

Comments:

- The 2nd order polynomial trend line depicted in Figure 2 shows an apparent increase in the removal rate. The apparent increase is skewed and may be an artifact related to the frequency of readings during the first 6 hours following startup. In accordance with the approved pulsing test protocol, there were a series of vapor phase concentration readings collected during the initial 6 hours after the system was restarted followed by fewer readings after the first 6 hours. Preliminary analysis of the pulsing test data indicates that vapor phase concentrations tend to be slightly elevated during startup following an extended shutdown, but are quickly reduced within an hour of startup to more typical/lower concentrations. This will be further analyzed and discussed in the Summary Report of the pulsing test program.
- Results of the June 2009 MPRS liquid effluent analytical data indicate the system discharge is in compliance with Monroe County Sewer Use Permit #834, District #8545.
- The attached REEP information is to be utilized as a subjective representation of the overall effectiveness/performance of the system as we are using discontinuous data and PID measurements for the removal calculations. We do not intend this tool as a definitive summary of recovered mass.
- MPRS operation and efficiency, inclusive of the replacement LRP pump and associated upgrades and maintenance, will continue to be monitored.
- We continue to work toward achieving approved regulatory closure. The monitoring data collected to date indicates that although there is continued variation in the data, we have reached the asymptotic limit for effective removal of Methylene Chloride. A report will be prepared at the end of the pulsing program to summarize the results and assess whether asymptotic conditions have been reached.

NYSDEC- Approved Field Decisions:

- None

If you have any questions regarding this monthly report or progress on the project, please don't hesitate to contact me at 513-314-7543 or rbethel@qmg-inc.com.

Sincerely,
QUANTUM MANAGEMENT GROUP, INC.



Rick Bethel
Senior Associate

Attachments

cc:

Mr. Jeffrey M. Kosmala, P.E. (MCDOH)
Mr. Michael Bogdan (Sanofi-Aventis)
Mr. Kevin Bruno (RFBC Law)
Mr. Mark Byrne, P.E. (Town of Henrietta)
Ms. Libby Ford, (Nixon Peabody)
Mr. Joseph Hausbeck, Esq. (NYSDEC)
Mr. George Hollerbach, P.E. (Quantum)

Ms. Melissa Menetti (NYSDOH)
Mr. David Panipinto (UCB)
Mr. Bart Putzig, P.E. (NYSDEC)
Mr. Sean Keenan (MCDES)
Mr. John Lang, P.E. (Quantum)
Mr. Greg Light (UCB)

Tables

TABLE 1 - TREATED WASTE WATER FLOW/VAPOR MONITORING DATA
MCA REMEDIATION SYSTEM
755 JEFFERSON ROAD, HENRIETTA, NEW YORK
NYSDEC VCP NUMBER V00126-8
June 2009

Date	Time ¹	Cumulative Hours ²	Total Flow ³ Gallons	Flow Rate ⁴ Gal/Min	Cumulative Gallons ^{5,6}	Influent PID (ppm)	Effluent PID (ppm)
5/26/2009	9:13	38559.3	719	0.1	290,104	1.8	0.6
6/22/2009	9:45	38561.6	194	1.4	290,298	0.1	0.0
6/22/2009	10:00	38561.9	6	0.3	290,304	0.0	0.0
6/22/2009	10:15	38562.1	24	1.9	290,328	0.0	0.0
6/22/2009	10:30	38562.5	46	1.8	290,374	0.0	0.0
6/29/2009	7:45	38563.2	73	1.8	290,447	0.3	0.0
6/29/2009	8:00	38563.5	64	3.8	290,511	0.0	0.0
6/29/2009	8:15	38563.8	16	0.9	290,527	0.0	0.0
6/29/2009	8:30	38564.0	26	1.9	290,553	0.0	0.0
6/29/2009	8:45	38564.3	26	1.5	290,579	0.0	0.0
6/29/2009	9:00	38564.5	18	1.3	290,597	0.0	0.0
6/29/2009	9:15	38564.8	36	2.1	290,633	0.0	0.0
6/29/2009	9:30	38565.0	16	1.2	290,649	0.0	0.0
6/29/2009	10:30	38566.0	88	1.5	290,737	0.0	0.0
6/29/2009	11:30	38567.1	89	1.4	290,826	0.0	0.0
6/29/2009	12:30	38567.9	66	1.4	290,892	0.0	0.0
6/29/2009	1:30	38569.2	106	1.3	290,998	0.0	0.0
6/30/2009	9:01	38588.5	1,066	0.9	292,064	0.2	0.0

² Cumulative Hours represents the number of run-hours since MCA remediation system start-up on 12 July 2006.

Gallons represents

Gallons/Minute

Gallons represents

readings collected

⁷ n/a: data not

available

TABLE 2 - RECOVERY WELL ROTATION DATA
MCA REMEDIATION SYSTEM
755 JEFFERSON ROAD, HENRIETTA, NEW YORK
NYSDEC VCP NUMBER V00126-8
June 2009

Date	Well Rotation Clusters								
	EXSB-2	MW-D8	MW -21	MW-22	MW-20A	MW-20B	RW-6	RW-5	RW-4
June 1-21	System shut down as part of NYSDEC approved pulsing program								
22-Jun		X						X	X
June 23-28	System shut down for repairs								
June 29-30		X						X	X

Figures

Figure 1
MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
June 2009

Total VOC Mass Removed (Vapor and Ground Water Combined)

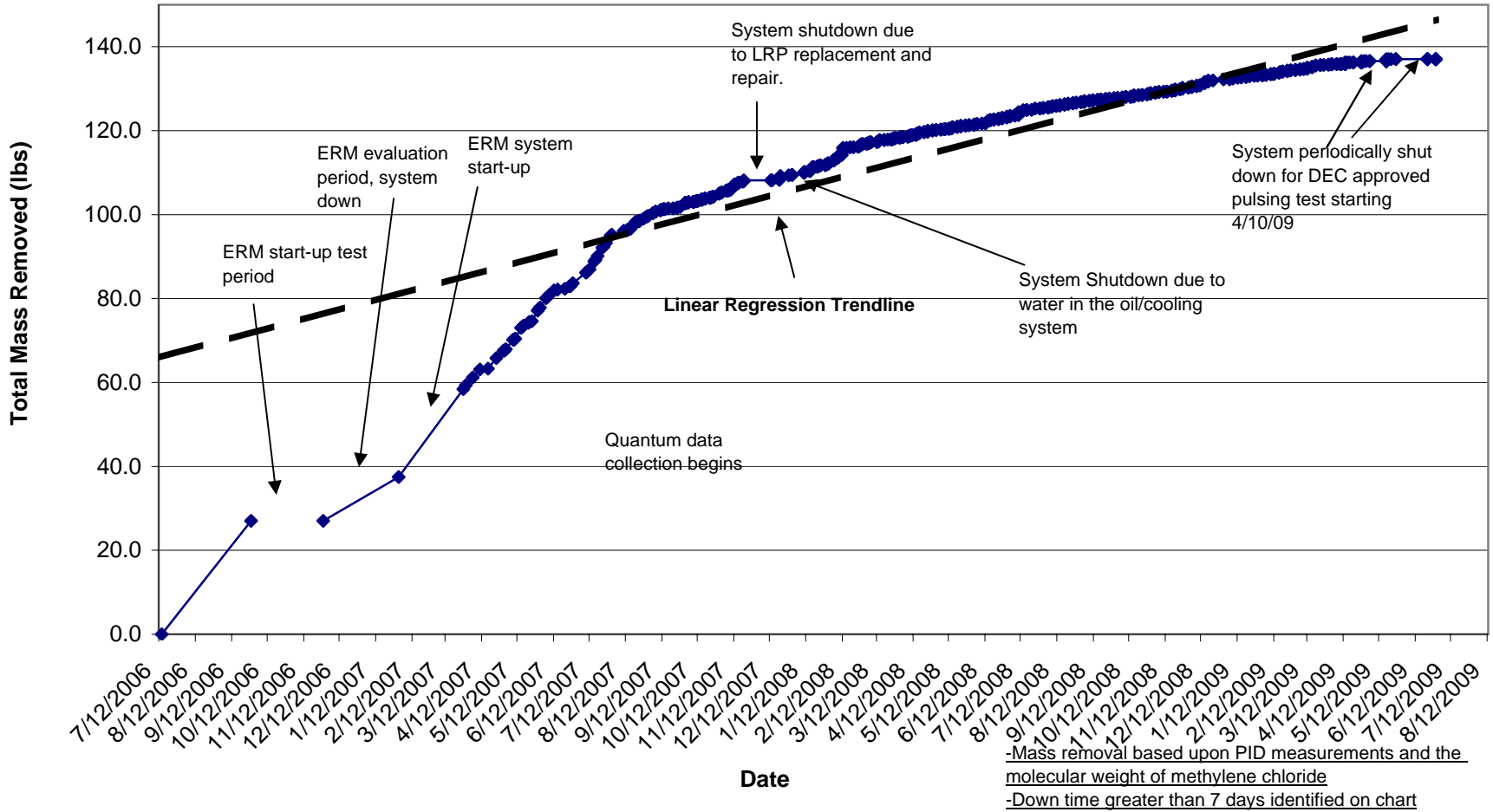


Figure 2

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
June 2009

Total VOC Mass Removal Rate (Vapor & Ground Water Combined)

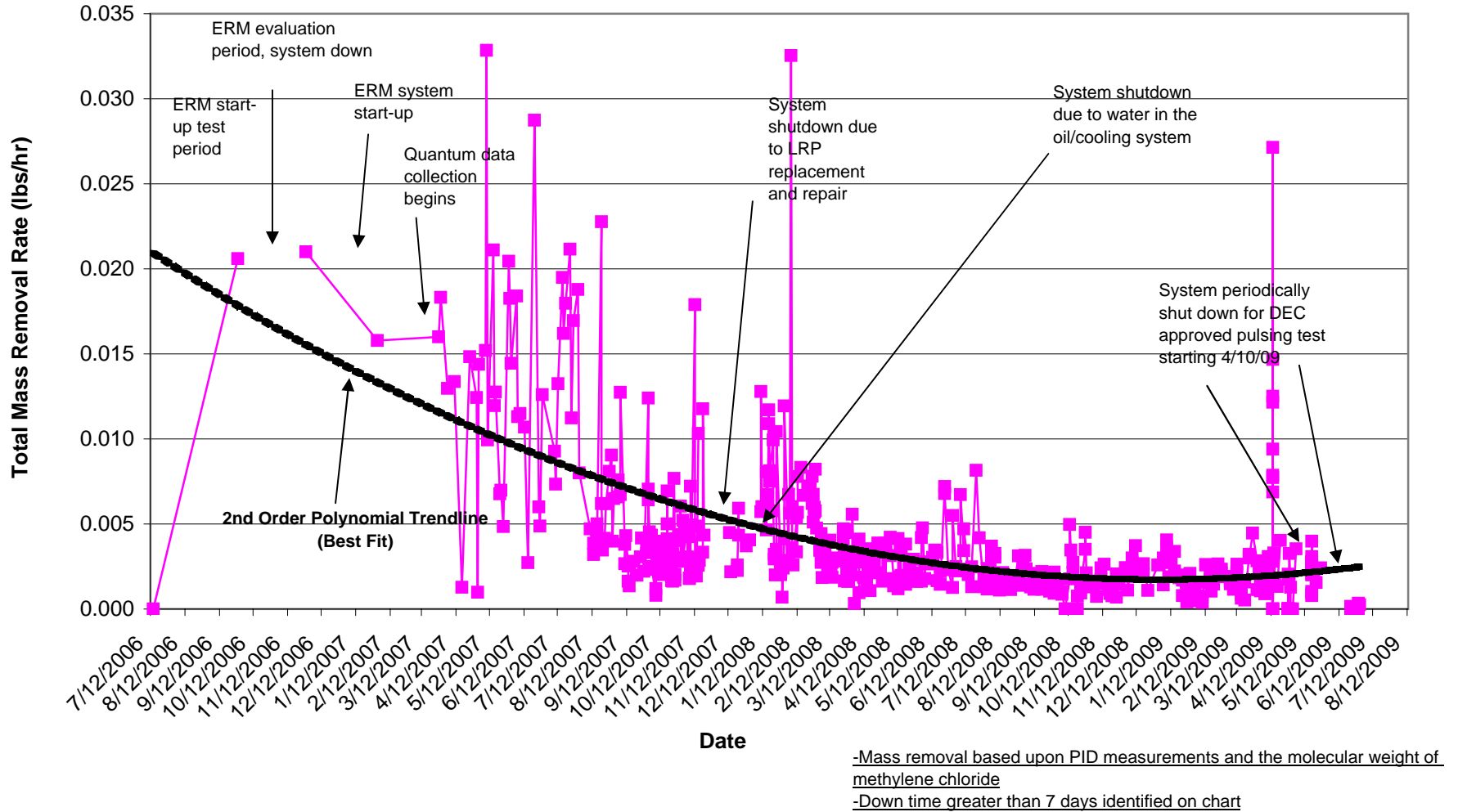
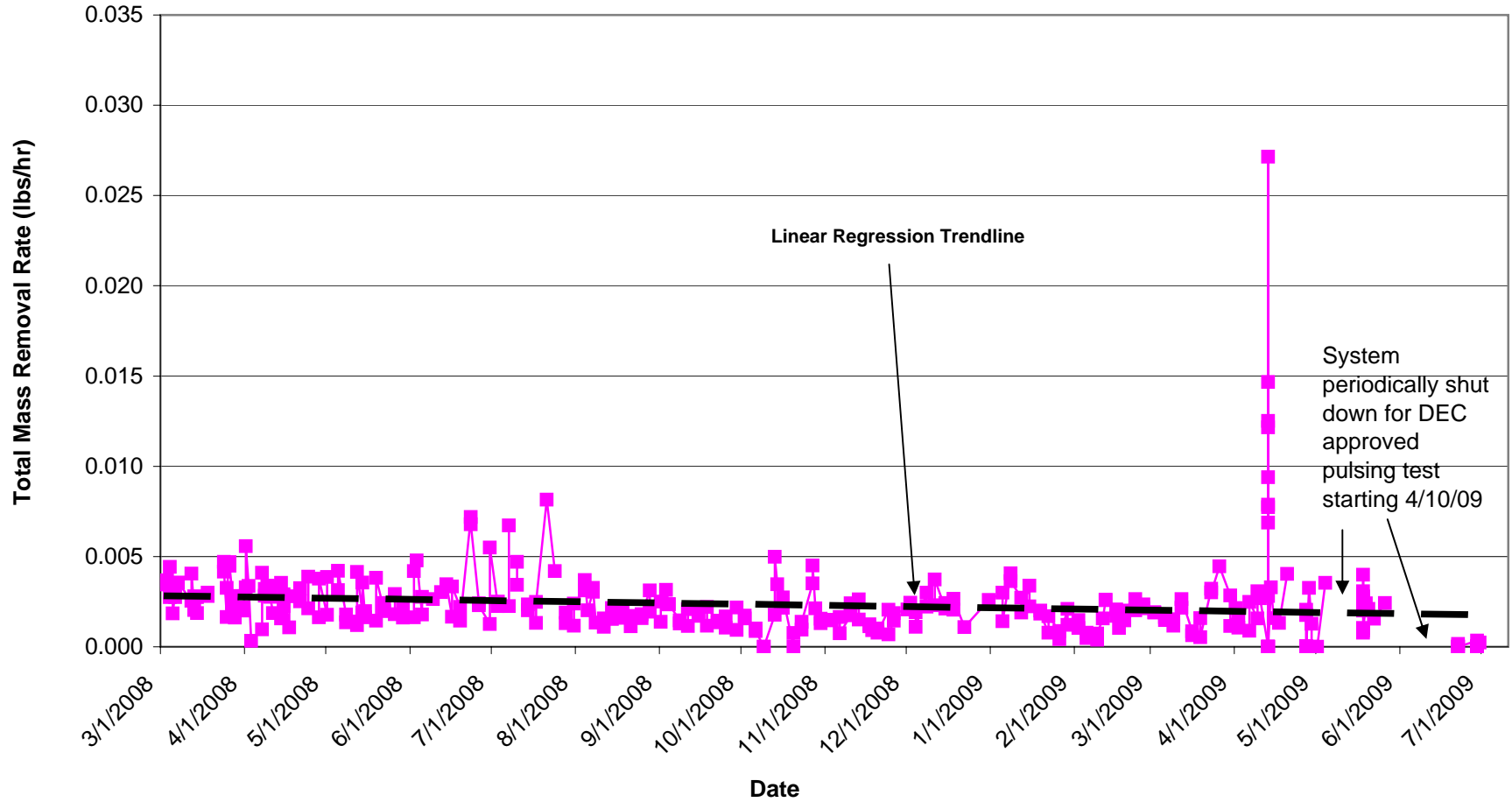


Figure 2A

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
June 2009

Total VOC Mass Removal Rate (Vapor & Ground Water Combined) Since March 2008



Mass removal based upon PID measurements and the molecular weight of methylene chloride

Figure 3

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
June 2009

Vapor Mass Removal Rate

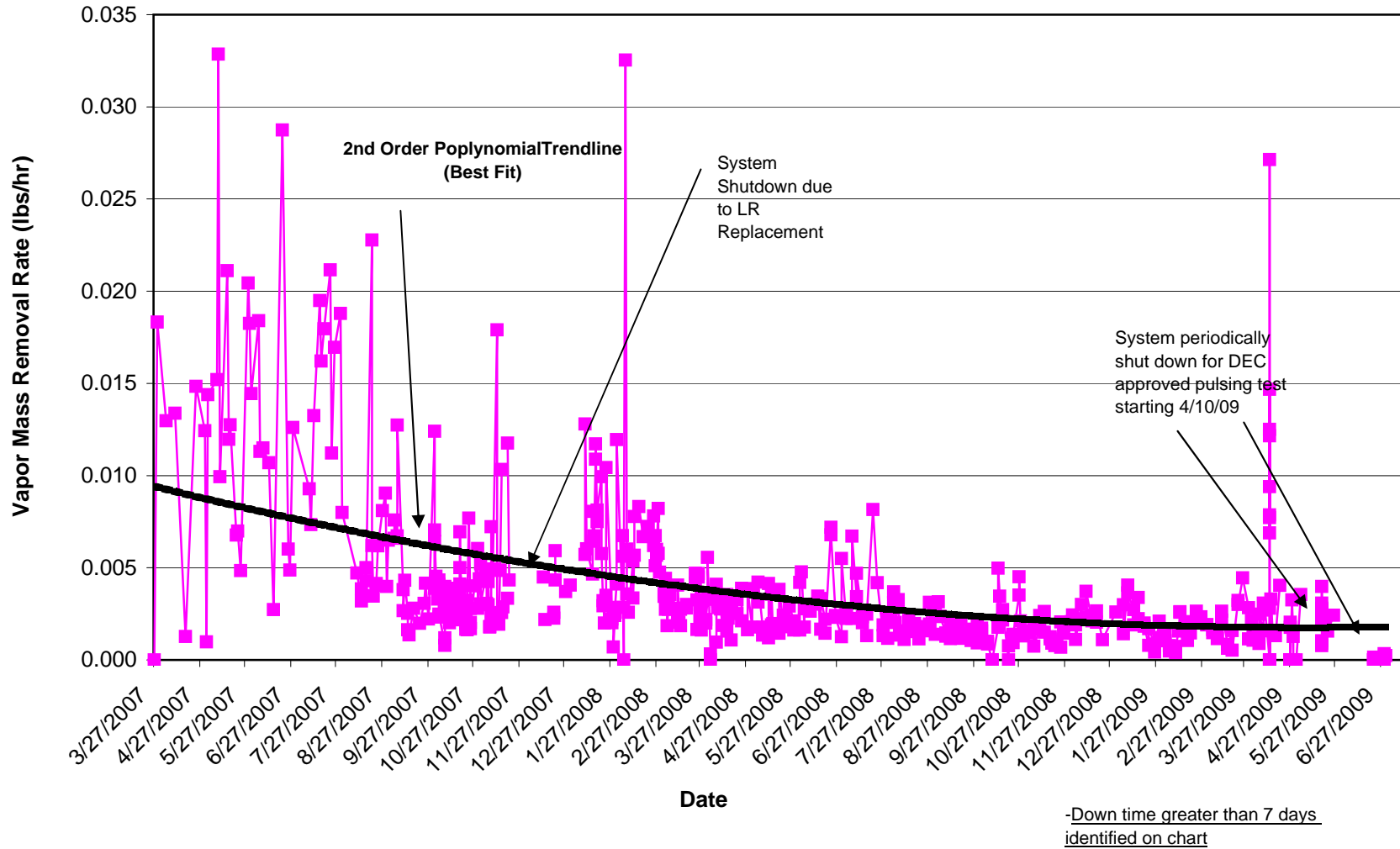


Figure 3A

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
June 2009

Vapor Mass Removal Rate Since March 2008

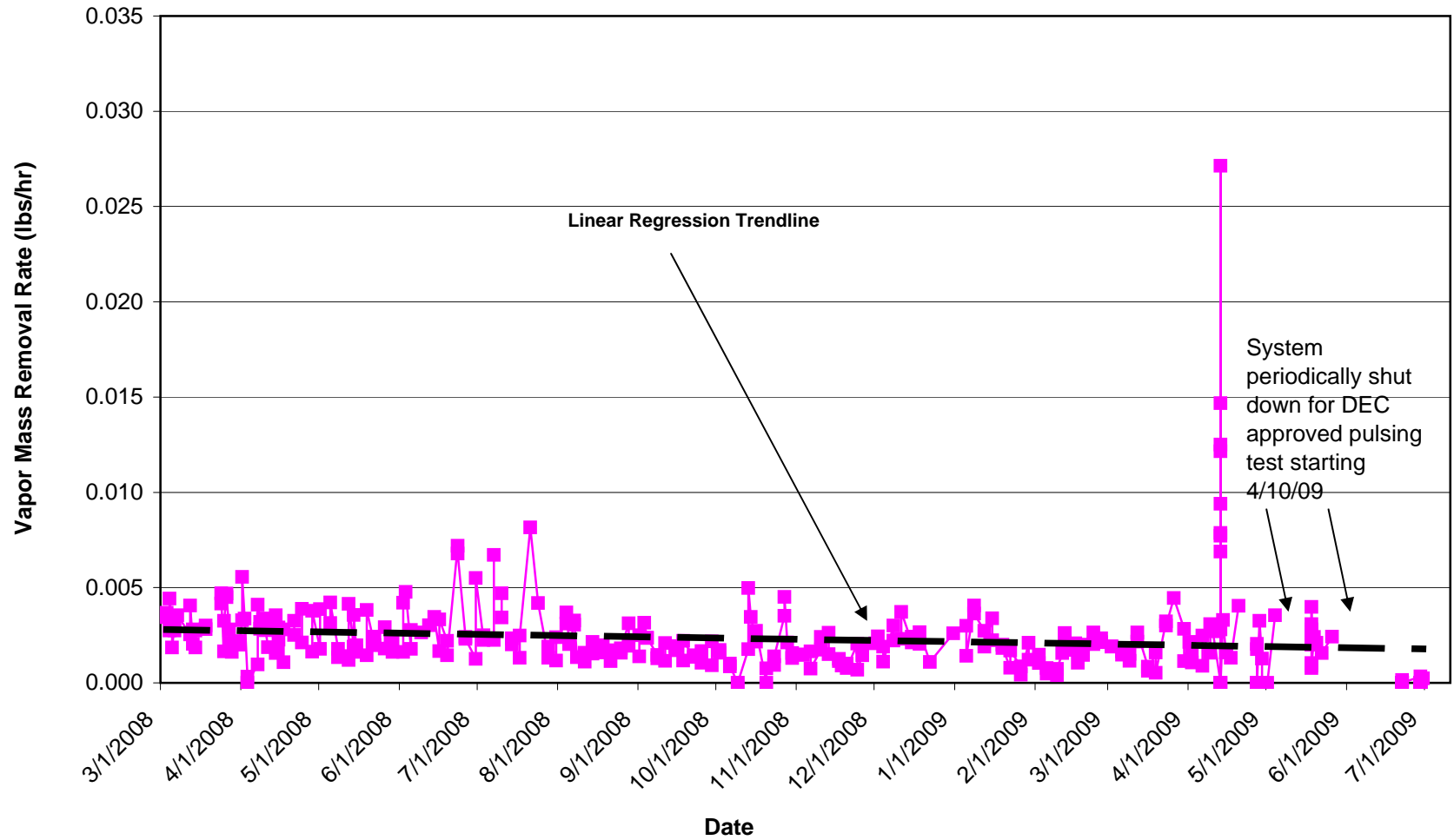
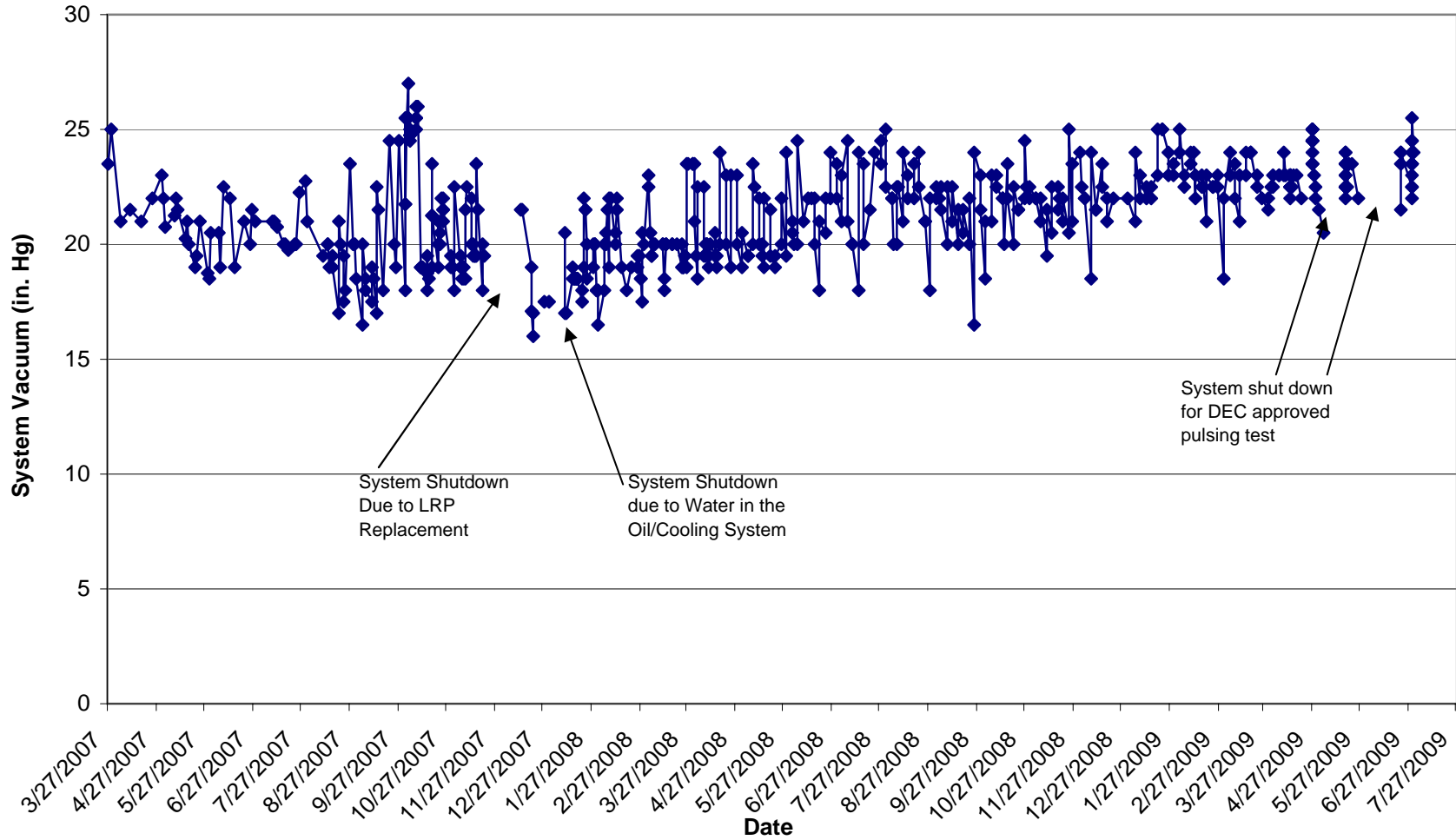


Figure 4

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
June 2009

System Vacuum

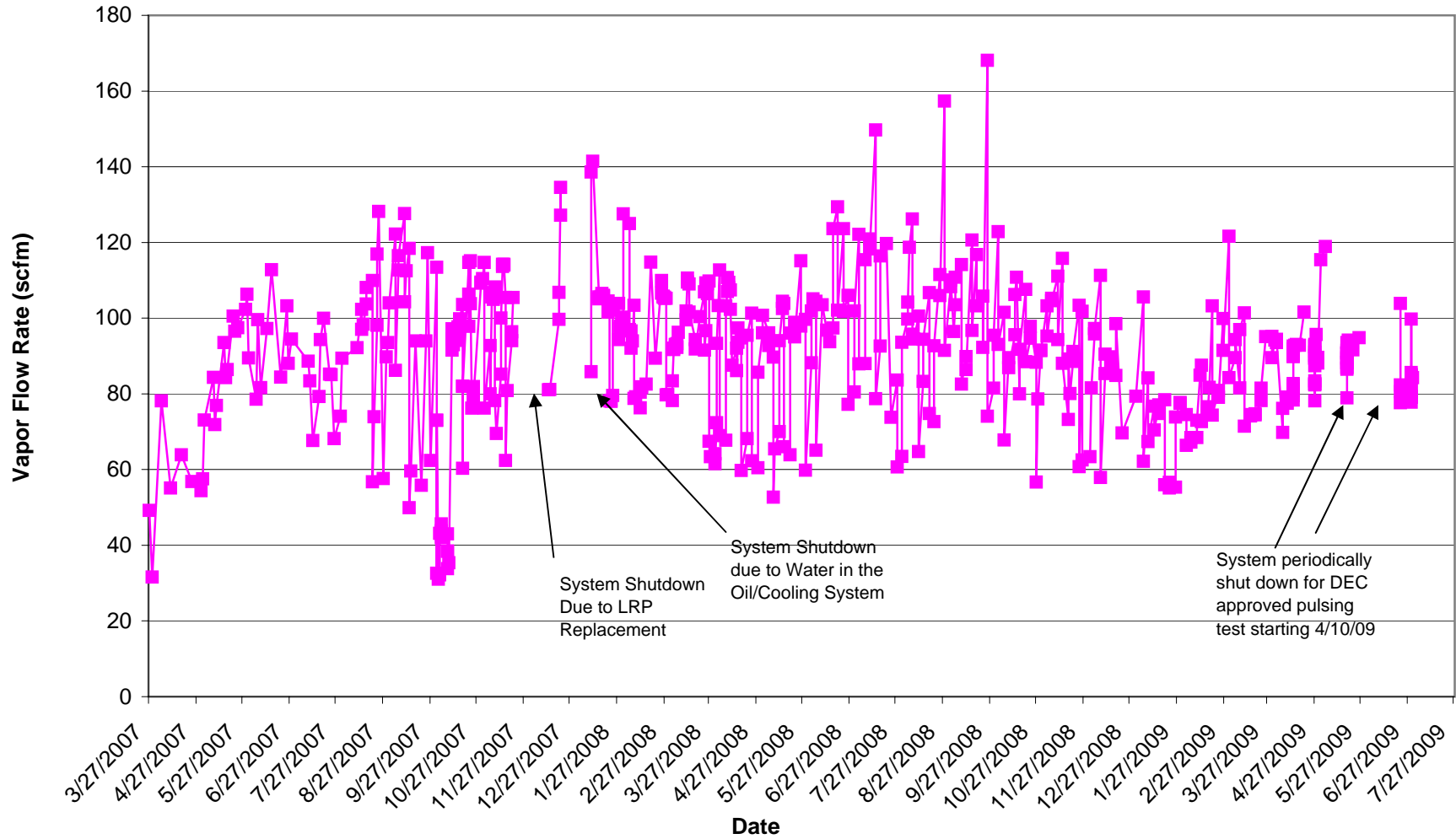


-Down time greater than 7 days identified on chart

Figure 5

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
June 2009

System Vapor Flow Rate

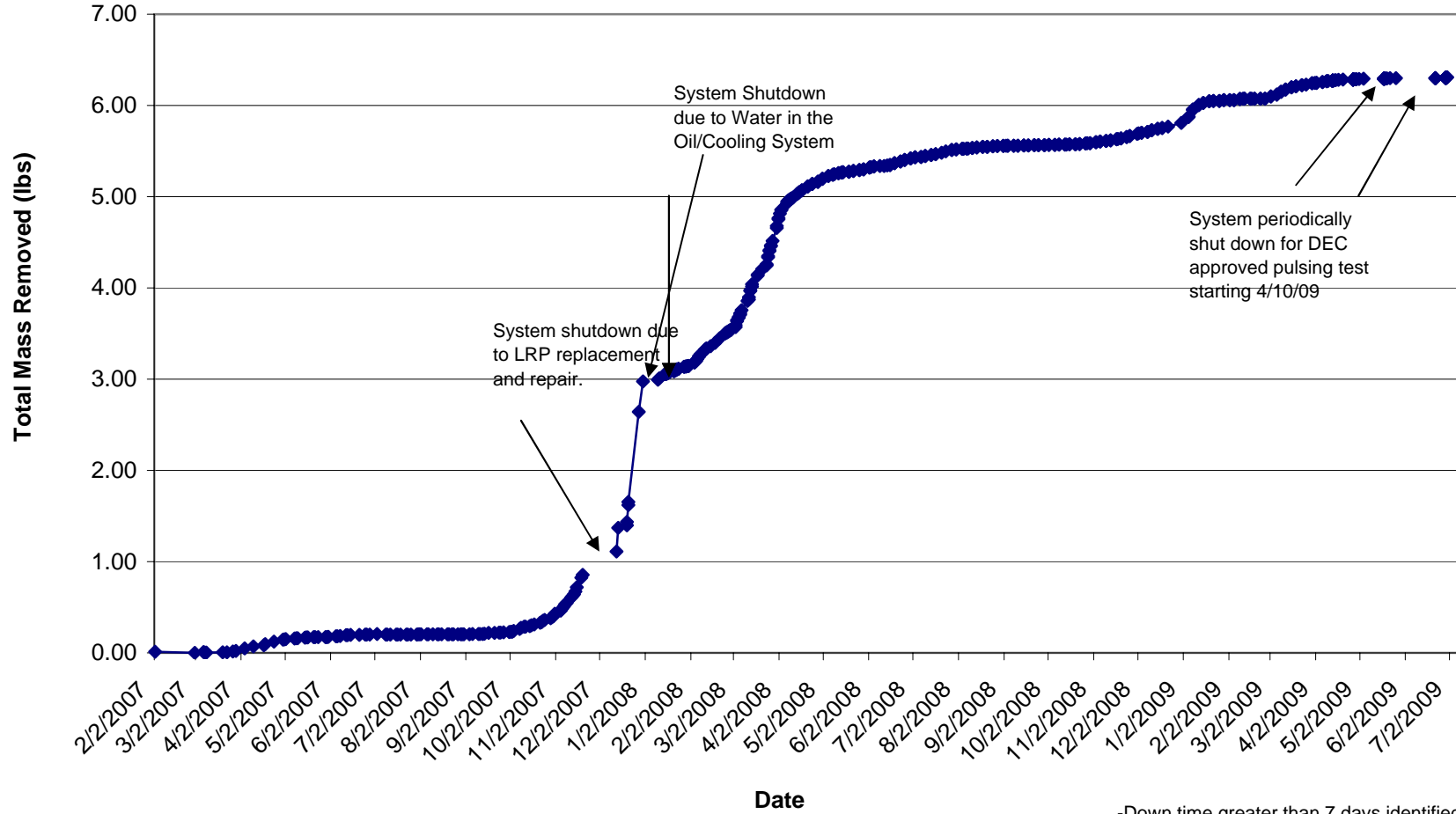


-Down time greater than 7 days identified on chart

Figure 6

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
June 2009

Total MeCl Mass Removed (Ground Water)

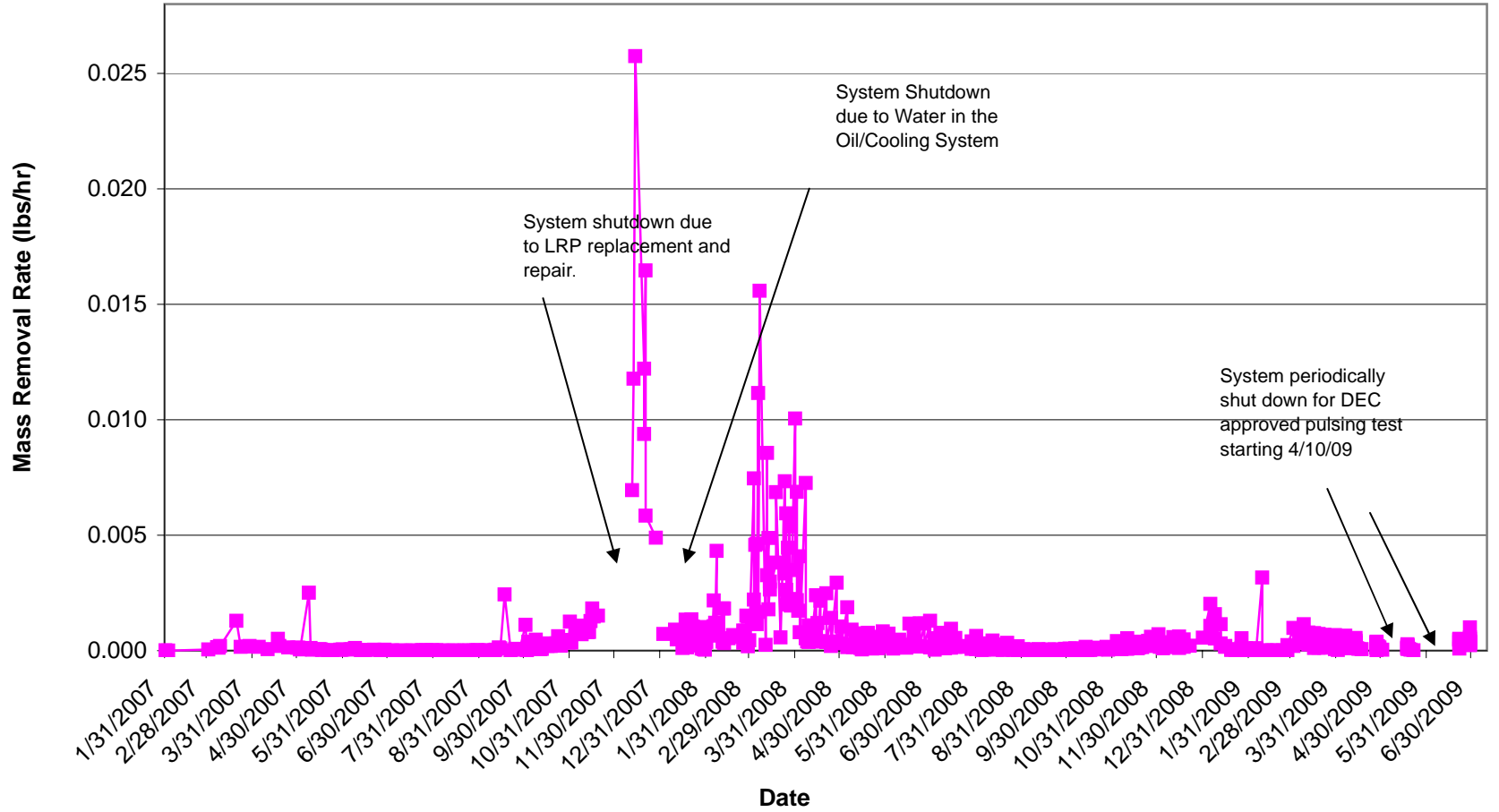


-Down time greater than 7 days identified on chart

Figure 7

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
June 2009

MeCl Mass Removal Rate (Ground Water)

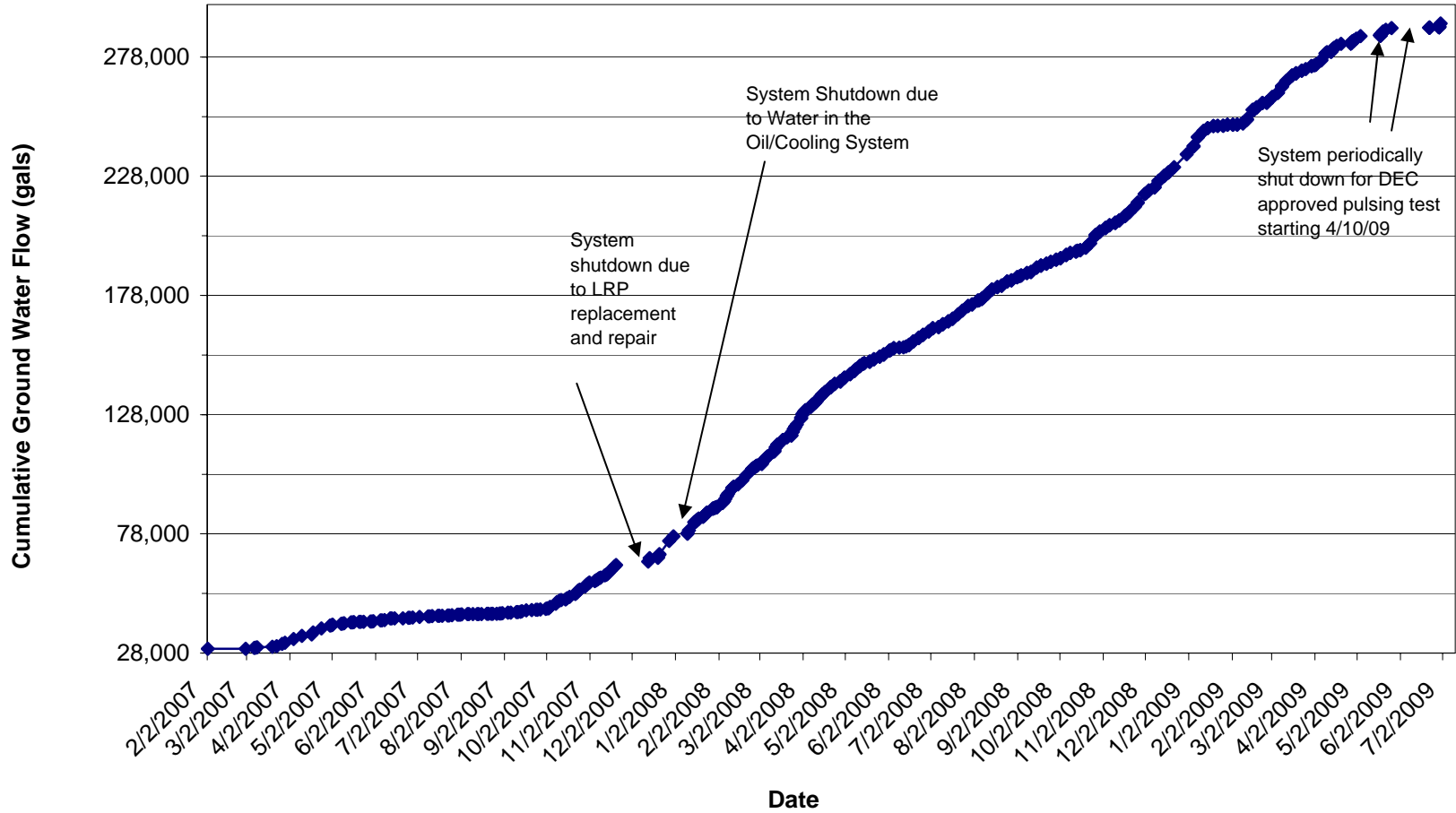


-Down time greater than 7 days identified on chart

Figure 8

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
June 2009

Cumulative Ground Water Flow

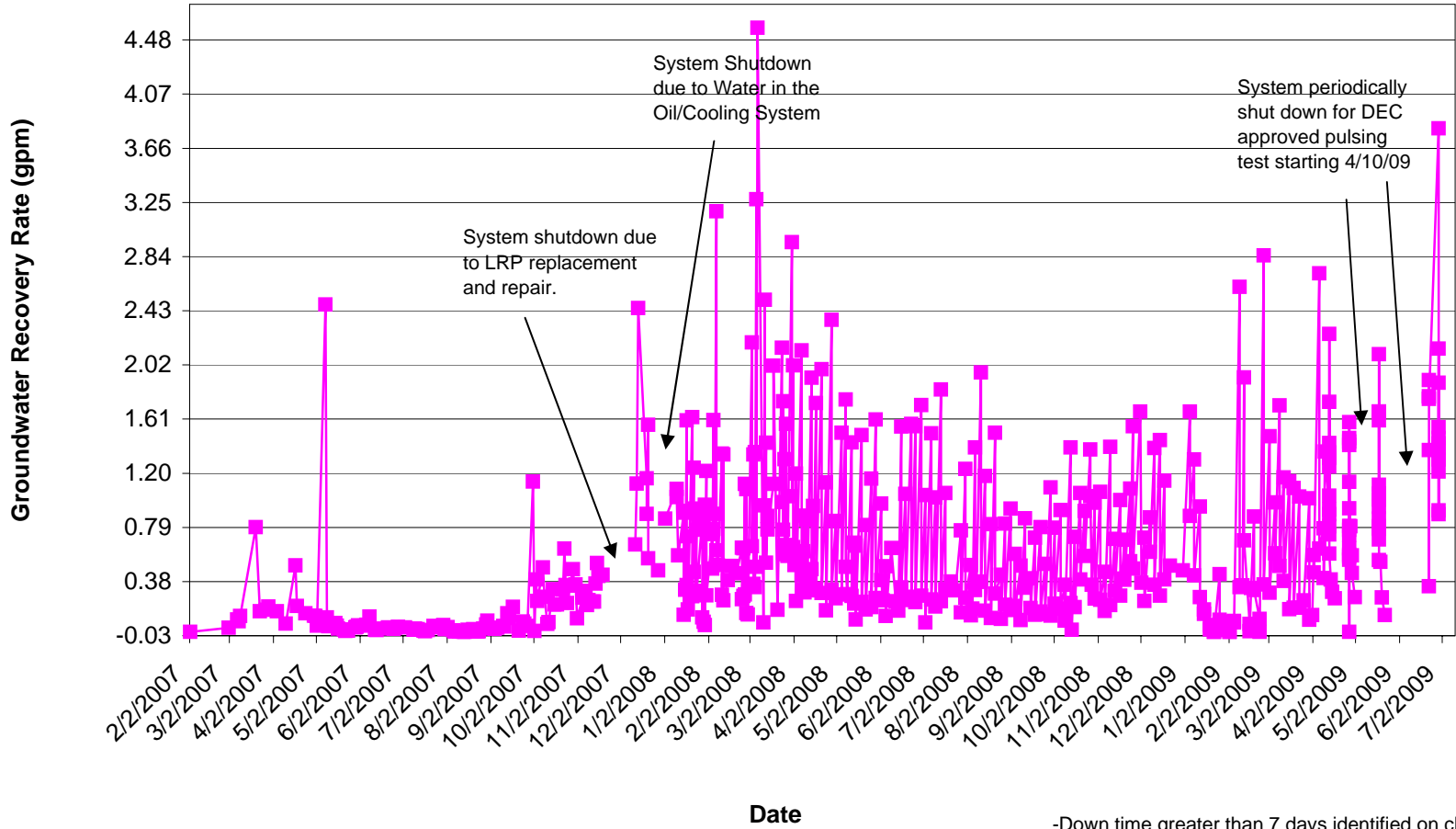


-Down time greater than 7 days identified on chart

Figure 9

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
June 2009

Ground Water Recovery Rate



-Down time greater than 7 days identified on chart

Analytical Data



July 9, 2009

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: Monthly Progress Report – June 2009
755 Jefferson Road Facility – Henrietta, New York
NYSDEC VCP Number V00126-8

**Key Actions
This Period:**

- **May 26 – June 30, 2009.** The system was intermittently operational due to the planned NYSDEC approved pulsing activities. In addition, there was an unplanned shutdown due to a system component failure. As a result the week of operation was postponed from June 22 through June 29 to the following week of June 29 through July 6, 2009.

Operations Metrics (May 26 – June 30)

- Operational Time: 29 out of a possible 30 hours of operation.
- Uptime Efficiency: 98%
 - Initiated approved pulsing mode.
 - Shutdown(s): Effluent transfer pump failure.
- Volume of Groundwater Treated: 1,960 gallons.
 - Discharged to: The sanitary sewer system.
- Total estimated VOC mass recovered to date: 137.0 lbs.
- Total estimated VOC mass recovered during May: 0.005 lbs.
- Mean estimated VOC mass removal rate for June 2009 versus May 2009: 0.0002 versus 0.0023 lbs/hr.
- General weather conditions: Average Spring temperatures and moderate precipitation throughout the month.

Tables, Figures and Graphs

- Table 1: May Treated Waste Water Flow/Vapor Monitoring Data.
- Table 2: May Recovery Well Rotation Data.
- Figures 1-9: Remedial Effectiveness and Efficiency Platform (REEP) graphs
- Figures 2A and 3A: Selected Remedial Effectiveness and Efficiency Platform (REEP) graphs showing results from March 1, 2008 to present.

**Problems/
Resolutions:**

- Effluent transfer pump failure and subsequent replacement.

**Analytical Data
Received:**

- The June 2009 MPRS liquid influent and midfluent analytical data.
- The June 2009 MPRS liquid effluent analytical data.
- The June 2009 MPRS vapor effluent analytical data.



Analytical Report Cover Page

Quantum Management Group

For Lab Project # 09-2208

Issued June 29, 2009

This report contains a total of 6 pages

The reported results relate only to the samples as they have been received by the laboratory.

Any noncompliant QC parameters having impact on the data are flagged or documented on the final report.

All soil/sludge samples have been reported on a dry weight basis, unless qualified "reported as received". Other solids are reported as received.

Each page of this document is part of a multipage report. This document may not be reproduced except in its entirety, without the prior consent of Paradigm Environmental Services, Inc.

The Chain of Custody provides additional information, including compliance with sample condition requirements upon receipt. Sample condition requirements are defined under the 2003 NELAC Standard, sections 5.5.8.3.1 and 5.5.8.3.2.

NYSDOH ELAP does not certify for all parameters. Paradigm Environmental Services or the indicated subcontracted laboratory does hold certification for all analytes where certification is offered by ELAP unless otherwise specified.

Data qualifiers are used, when necessary, to provide additional information about the data. This information may be communicated as a flag or as text at the bottom of the report. Please refer to the following list of frequently used data flags and their meaning:

"ND" = analyzed for but not detected.

"E" = Result has been estimated, calibration limit exceeded.

"D" = Duplicate results outside QC limits. May indicate a non-homogenous matrix.

"M" = Matrix spike recoveries outside QC limits. Matrix bias indicated.

"B" = Method blank contained trace levels of analyte. Refer to included method blank report.

Volatile Analysis Report for Water

Client: Quantum Management Group

Client Job Site: MPRS @ UCB
Jefferson Rd.
Client Job Number: N/A
Field Location: PreBT / Inf 1,2,3 Comp
Field ID Number: N/A
Sample Type: Water

Lab Project Number: 09-2208
Lab Sample Number: 7154
Date Sampled: 06/22/2009
Date Received: 06/22/2009
Date Analyzed: 06/25/2009

Liquid Influent

Compounds	Results in ug / L
Acetone	ND< 500
Amyl Acetate	ND< 1,250
Benzene	ND< 35.0
2-Butanone	ND< 500
Carbon disulfide	ND< 250
Chloroform	ND< 100
Chloromethane	ND< 100
cis-1,2-Dichloroethene	ND< 100
Ethyl acetate	ND< 1,250
Isopropyl acetate	ND< 1,250
Methylene chloride	529
m,p-Xylene	ND< 100
o-Xylene	ND< 100


ELAP Number 10958

Method: EPA 624

Data File: V66692.D

Comments: ND denotes Non Detect
ug / L = microgram per Liter

Signature: _____


Bruce Hoogesteger: Technical Director

Volatile Analysis Report for Water

Client: Quantum Management Group

Client Job Site: MPRS @ UCB
Jefferson Rd.
Client Job Number: N/A
Field Location: SP-300 / Mid 1,2,3 Comp
Field ID Number: N/A
Sample Type: Water

Lab Project Number: 09-2208
Lab Sample Number: 7155
Date Sampled: 06/22/2009
Date Received: 06/22/2009
Date Analyzed: 06/25/2009

Liquid Mid-fluent

Compounds	Results in ug / L
Acetone	ND< 10.0
Amyl Acetate	ND< 25.0
Benzene	ND< 0.700
2-Butanone	ND< 10.0
Carbon disulfide	ND< 5.00
Chloroform	ND< 2.00
Chloromethane	ND< 2.00
cis-1,2-Dichloroethene	ND< 2.00
Ethyl acetate	ND< 25.0
Isopropyl acetate	ND< 25.0
Methylene chloride	113
m,p-Xylene	ND< 2.00
o-Xylene	ND< 2.00

ELAP Number 10958

Method: EPA 624

Data File: V66693.D

Comments: ND denotes Non Detect
ug / L = microgram per Liter

Signature: _____


Bruce Hoogesteger: Technical Director

Volatile Analysis Report for Water

Client: **Quantum Management Group**

Client Job Site: MPRS @ UCB
Jefferson Rd.
Client Job Number: N/A
Field Location: SP-302 / Eff 1,2,3 Comp
Field ID Number: N/A
Sample Type: Water

Lab Project Number: 09-2208
Lab Sample Number: 7156
Date Sampled: 06/22/2009
Date Received: 06/22/2009
Date Analyzed: 06/25/2009

Liquid Effluent

Compounds	Results in ug / L
Acetone	ND< 10.0
Amyl Acetate	ND< 25.0
Benzene	ND< 0.700
2-Butanone	ND< 10.0
Carbon disulfide	ND< 5.00
Chloroform	ND< 2.00
Chloromethane	ND< 2.00
cis-1,2-Dichloroethene	ND< 2.00
Ethyl acetate	ND< 25.0
Isopropyl acetate	ND< 25.0
Methylene chloride	ND< 5.00
m,p-Xylene	ND< 2.00
o-Xylene	ND< 2.00

ELAP Number 10958

Method: EPA 624

Data File: V66694.D

Comments: ND denotes Non Detect
ug / L = microgram per Liter
Surrogate outliers indicate probable matrix interference

Signature: _____


Bruce Hoogesteger: Technical Director

Volatile Analysis Report for Air

Client: Quantum Management Group

Client Job Site:	MPRS @ UCB Jefferson Rd	Lab Project Number:	09-2208
Client Job Number:	N/A	Lab Sample Number:	7157
Field Location:	SP-102 Tedlar Bag	Date Sampled:	06/22/2009
Field ID Number:	N/A	Date Received:	06/22/2009
Sample Type:	Air	Date Analyzed:	06/29/2009

Vapor Influent

Compound	Results in PPBv	Results in ug / m3
Acetone	ND< 4,220	ND< 10,000
Benzene	ND< 627	ND< 2,000
2-Butanone	ND< 3,400	ND< 10,000
Carbon disulfide	ND< 643	ND< 2,000
Chloroform	ND< 414	ND< 2,000
Chloromethane	ND< 978	ND< 2,000
cis-1,2-Dichloroethene	ND< 509	ND< 2,000
Methylene chloride	ND< 1,460	ND< 5,000
m,p-Xylene	ND< 461	ND< 2,000
o-Xylene	ND< 461	ND< 2,000

ELAP Number 10958

Method: EPA 8260B
Modified for Tedlar Bag

Data File: V66718.D

Comments: ND denotes Non Detect
PPBv = Parts per Billion volume
ug / m3 - Microgram per cubic meter.

Signature: _____

Bruce Hoogesteger: Technical Director



Analytical Report Cover Page

Quantum Management Group

For Lab Project # 09-2306

Issued July 7, 2009

This report contains a total of 3 pages

The reported results relate only to the samples as they have been received by the laboratory.

Any noncompliant QC parameters having impact on the data are flagged or documented on the final report.

All soil/sludge samples have been reported on a dry weight basis, unless qualified "reported as received". Other solids are reported as received.

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The Chain of Custody provides additional information, including compliance with sample condition requirements upon receipt. Sample condition requirements are defined under the 2003 NELAC Standard, sections 5.5.8.3.1 and 5.5.8.3.2.

NYSDOH ELAP does not certify for all parameters. Paradigm Environmental Services or the indicated subcontracted laboratory does hold certification for all analytes where certification is offered by ELAP unless otherwise specified.

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"E" = Result has been estimated, calibration limit exceeded.

"D" = Duplicate results outside QC limits. May indicate a non-homogenous matrix.

"M" = Matrix spike recoveries outside QC limits. Matrix bias indicated.

"B" = Method blank contained trace levels of analyte. Refer to included method blank report.



Volatile Analysis Report for Air

Client: Quantum Management Group

Client Job Site:	MPRS @ UCB Jefferson Rd	Lab Project Number:	09-2306
		Lab Sample Number:	7430
Client Job Number:	N/A		
Field Location:	MW-08 Tedlar Bag	Date Sampled:	06/29/2009
Field ID Number:	N/A	Date Received:	06/29/2009
Sample Type:	Air	Date Analyzed:	07/07/2009

MW-D8 Vapor Sample


Compound	Results in PPBv	Results in ug / m3
Acetone	ND< 4,220	ND< 10,000
Benzene	ND< 627	ND< 2,000
2-Butanone	ND< 3,400	ND< 10,000
Carbon disulfide	ND< 643	ND< 2,000
Chloroform	ND< 414	ND< 2,000
Chloromethane	ND< 978	ND< 2,000
cis-1,2-Dichloroethene	ND< 509	ND< 2,000
Methylene chloride	2,390	8,210
m,p-Xylene	ND< 461	ND< 2,000
o-Xylene	ND< 461	ND< 2,000

ELAP Number 10958

Method: EPA 8260B
Modified for Tedlar Bag

Data File: V66929.D

Comments: ND denotes Non Detect
PPBv = Parts per Billion volume
ug / m3 - Microgram per cubic meter.

Signature: 
Bruce Hoogesteger: Technical Director



Volatile Analysis Report for Air

Client: Quantum Management Group

Client Job Site:	MPRS @ UCB Jefferson Rd	Lab Project Number:	09-1533
Client Job Number:	N/A	Lab Sample Number:	5252
Field Location:	MW-08 Tedlar Bag	Date Sampled:	04/27/2009
Field ID Number:	N/A	Date Received:	04/29/2009
Sample Type:	Air	Date Analyzed:	05/06/2009

MW-D8 Vapor Sample

Compound	Results in PPBv	Results in ug / m3
Acetone	ND< 4,220	ND< 10,000
Benzene	ND< 627	ND< 2,000
2-Butanone	ND< 3,400	ND< 10,000
Carbon disulfide	ND< 643	ND< 2,000
Chloroform	ND< 414	ND< 2,000
Chloromethane	ND< 978	ND< 2,000
cis-1,2-Dichloroethene	ND< 509	ND< 2,000
Methylene chloride	5,650	19,400
m,p-Xylene	ND< 461	ND< 2,000
o-Xylene	ND< 461	ND< 2,000

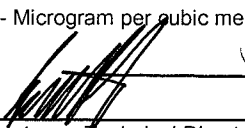
ELAP Number 10958

Method: EPA 8260B
Modified for Tedlar Bag

Data File: V65473.D

Comments: ND denotes Non Detect
PPBv = Parts per Billion volume
ug / m3 - Microgram per cubic meter.

Signature: _____


Bruce Hoogesteger: Technical Director

**Volatile Analysis Report for Air**Client: Quantum Management Group

Client Job Site:	MPRS @ UCB Jefferson Rd	Lab Project Number:	09-1800
		Lab Sample Number:	5995
Client Job Number:	N/A		
Field Location:	MW -08 Tedlar Bag	Date Sampled:	05/18/2009
Field ID Number:	N/A	Date Received:	05/19/2009
Sample Type:	Air	Date Analyzed:	05/26/2009

MW-D8 Vapor Sample

Compound	Results in PPBv	Results in ug / m3
Acetone	ND< 4,220	ND< 10,000
Benzene	ND< 627	ND< 2,000
2-Butanone	ND< 3,400	ND< 10,000
Carbon disulfide	ND< 643	ND< 2,000
Chloroform	ND< 414	ND< 2,000
Chloromethane	ND< 978	ND< 2,000
cis-1,2-Dichloroethene	ND< 509	ND< 2,000
Methylene chloride	6,610	22,700
m,p-Xylene	ND< 461	ND< 2,000
o-Xylene	ND< 461	ND< 2,000

ELAP Number 10958

Method: EPA 8260B
Modified for Tedlar Bag

Data File: V65900.D

Comments: ND denotes Non Detect
 PPBv = Parts per Billion volume
 ug / m3 - Microgram per cubic meter.

Signature: _____

Bruce Hoogesteger: Technical Director

Volatile Analysis Report for Air

Client: **Quantum Management Group**

Client Job Site: MPRS @ UCB
Jefferson Rd
Client Job Number: N/A
Field Location: MW-D8 Tedlar Bag
Field ID Number: N/A
Sample Type: Air

Lab Project Number: 09-1320
Lab Sample Number: 4581
Date Sampled: 04/13/2009
Date Received: 04/14/2009
Date Analyzed: 04/20/2009

MW-D8 Vapor Sample

Compound	Results in mg / m3
Acetone	ND< 10.0
Benzene	ND< 2.00
2-Butanone	ND< 5.00
Carbon disulfide	ND< 5.00
Chloroform	ND< 2.00
Chloromethane	ND< 2.00
cis-1,2-Dichloroethene	ND< 2.00
Methylene chloride	128
m,p-Xylene	ND< 2.00
o-Xylene	ND< 2.00

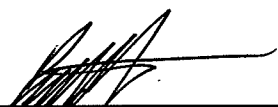
ELAP Number 10958

Method: EPA 8260B
Modified for Tedlar Bag

Data File: V65170.D

Comments: ND denotes Non Detect
ug / Kg = microgram per Kilogram

Signature: _____


Bruce Hoogesteger: Technical Director

Analytical Report

Work Order: RSF0858

Project Description
Sanofi-Aventis Sampling

For:

Alex Wirth

Kleinfelder, Inc.

6390 Fly Road 2nd Floor
East Syracuse, NY 13057



Richard Lafond

Project Manager

Richard.Lafond@testamericainc.com

Monday, July 6, 2009

The test results in this report meet all NELAP requirements for analytes for which accreditation is required or available. Any exception to NELAP requirements are noted in this report. Pursuant to NELAP, this report may not be reproduced, except in full, without the written approval of the laboratory. All questions regarding this test report should be directed to the TestAmerica Project manager who has signed this report.

TestAmerica Buffalo Current Certifications

As of 1/27/2009

STATE	Program	Cert # / Lab ID
Arkansas	CWA, RCRA, SOIL	88-0686
California*	NELAP CWA, RCRA	01169CA
Connecticut	SDWA, CWA, RCRA, SOIL	PH-0568
Florida*	NELAP CWA, RCRA	E87672
Georgia*	SDWA, NELAP CWA, RCRA	956
Illinois*	NELAP SDWA, CWA, RCRA	200003
Iowa	SW/CS	374
Kansas*	NELAP SDWA, CWA, RCRA	E-10187
Kentucky	SDWA	90029
Kentucky UST	UST	30
Louisiana*	NELAP CWA, RCRA	2031
Maine	SDWA, CWA	NY0044
Maryland	SDWA	294
Massachusetts	SDWA, CWA	M-NY044
Michigan	SDWA	9937
Minnesota	SDWA, CWA, RCRA	036-999-337
New Hampshire*	NELAP SDWA, CWA	233701
New Jersey*	NELAP, SDWA, CWA, RCRA,	NY455
New York*	NELAP, AIR, SDWA, CWA, RCRA, CLP	10026
Oklahoma	CWA, RCRA	9421
Pennsylvania*	NELAP CWA, RCRA	68-00281
Tennessee	SDWA	02970
Texas*	NELAP CWA, RCRA	T10470441208-TX
USDA	FOREIGN SOIL PERMIT	S-41579
USDOE	Department of Energy	DOECAP-STB
Virginia	SDWA	278
Washington*	NELAP CWA, RCRA	C1677
Wisconsin	CWA, RCRA	998310390
West Virginia	CWA, RCRA	252

*As required under the indicated accreditation, the test results in this report meet all NELAP requirements for parameters for which accreditation is required or available. Any exceptions to NELAP requirements are noted in this report.

Kleinfelder, Inc.
6390 Fly Road 2nd Floor
East Syracuse, NY 13057

Work Order: RSF0858
Project: Sanofi-Aventis Sampling
Project Number: NA

Received: 06/19/09
Reported: 07/06/09 14:43

Case Narrative

According to 40CFR Part 136.3, pH, Chlorine Residual, Dissolved Oxygen, Sulfite, and Temperature analyses are to be performed immediately after aqueous sample collection. When these parameters are not indicated as field (e.g. field-pH), they were not analyzed immediately, but as soon as possible after laboratory receipt.

A pertinent document is appended to this report, 1 page, is included and is an integral part of this report.

Reproduction of this analytical report is permitted only in its entirety. This report shall not be reproduced except in full without the written approval of the laboratory.

TestAmerica Laboratories, Inc. certifies that the analytical results contained herein apply only to the samples tested as received by our Laboratory.

Kleinfelder, Inc.
6390 Fly Road 2nd Floor
East Syracuse, NY 13057

Work Order: RSF0858
Project: Sanofi-Aventis Sampling
Project Number: NA

Received: 06/19/09
Reported: 07/06/09 14:43

DATA QUALIFIERS AND DEFINITIONS

- B** Analyte was detected in the associated Method Blank.
- D08** Dilution required due to high concentration of target analyte(s)
- J** Analyte detected at a level less than the Reporting Limit (RL) and greater than or equal to the Method Detection Limit (MDL). Concentrations within this range are estimated.
- NR** Any inclusion of NR indicates that the project specific requirements do not require reporting estimated values below the laboratory reporting limit.

Kleinfelder, Inc.
6390 Fly Road 2nd Floor
East Syracuse, NY 13057

Work Order: RSF0858
Project: Sanofi-Aventis Sampling
Project Number: NA

Received: 06/19/09
Reported: 07/06/09 14:43

Executive Summary - Detections

Analyte	Sample Result	Data Qualifiers	RL	MDL	Units	Dil Fac	Date Analyzed	Lab Tech	Batch	Method
Sample ID: RSF0858-01 (MW-18 - Water)					Sampled: 06/19/09 10:00			Recvd: 06/19/09 16:30		
<u>Volatile Organic Compounds</u>										
2-Butanone	12	J	25	3.6	ug/L	1.00	06/26/09 00:52	MF	9F25108	624
Methylene Chloride	5.7	B	5.0	0.81	ug/L	1.00	06/26/09 00:52	MF	9F25108	624
Sample ID: RSF0858-02 (MW-D7 - Water)					Sampled: 06/19/09 09:35			Recvd: 06/19/09 16:30		
<u>Volatile Organic Compounds</u>										
Methylene Chloride	1.8	J, B	5.0	0.81	ug/L	1.00	06/26/09 01:17	MF	9F25108	624
Sample ID: RSF0858-03 (MW-D8 - Water)					Sampled: 06/19/09 10:35			Recvd: 06/19/09 16:30		
<u>Volatile Organic Compounds</u>										
Methylene Chloride	29000	D08,B	2500	410	ug/L	500	07/02/09 13:46	TRB	9G02007	624
Sample ID: RSF0858-04 (MW-D12 - Water)					Sampled: 06/19/09 14:30			Recvd: 06/19/09 16:30		
<u>Volatile Organic Compounds</u>										
Methylene Chloride	0.85	J, B	5.0	0.81	ug/L	1.00	06/26/09 02:07	MF	9F25108	624
Sample ID: RSF0858-05 (MW-D13 - Water)					Sampled: 06/19/09 12:30			Recvd: 06/19/09 16:30		
<u>Volatile Organic Compounds</u>										
Methylene Chloride	1.2	J, B	5.0	0.81	ug/L	1.00	06/26/09 02:33	MF	9F25108	624
Sample ID: RSF0858-06 (RW-2 - Water)					Sampled: 06/19/09 11:10			Recvd: 06/19/09 16:30		
<u>Volatile Organic Compounds</u>										
Methylene Chloride	2.8	J, B	5.0	0.81	ug/L	1.00	06/26/09 02:57	MF	9F25108	624
Sample ID: RSF0858-07 (RW-4 - Water)					Sampled: 06/19/09 13:00			Recvd: 06/19/09 16:30		
<u>Volatile Organic Compounds</u>										
Methylene Chloride	78	D08,B	10	1.6	ug/L	2.00	07/02/09 14:11	TRB	9G02007	624
Sample ID: RSF0858-08 (RW-5(23) - Water)					Sampled: 06/19/09 15:30			Recvd: 06/19/09 16:30		
<u>Volatile Organic Compounds</u>										
Methylene Chloride	0.94	J, B	5.0	0.81	ug/L	1.00	07/02/09 14:37	TRB	9G02007	624
Sample ID: RSF0858-09 (RW-5 - Water)					Sampled: 06/19/09 16:05			Recvd: 06/19/09 16:30		
<u>Volatile Organic Compounds</u>										
Methylene Chloride	2.2	J, B	5.0	0.81	ug/L	1.00	07/02/09 15:02	TRB	9G02007	624

Kleinfelder, Inc.
6390 Fly Road 2nd Floor
East Syracuse, NY 13057

Work Order: RSF0858
Project: Sanofi-Aventis Sampling
Project Number: NA

Received: 06/19/09
Reported: 07/06/09 14:43

Sample Summary

Sample Identification	Lab Number	Client Matrix	Date/Time Sampled	Date/Time Received	Sample Qualifiers
MW-18	RSF0858-01	Water	06/19/09 10:00	06/19/09 16:30	
MW-D7	RSF0858-02	Water	06/19/09 09:35	06/19/09 16:30	
MW-D8	RSF0858-03	Water	06/19/09 10:35	06/19/09 16:30	
MW-D12	RSF0858-04	Water	06/19/09 14:30	06/19/09 16:30	
MW-D13	RSF0858-05	Water	06/19/09 12:30	06/19/09 16:30	
RW-2	RSF0858-06	Water	06/19/09 11:10	06/19/09 16:30	
RW-4	RSF0858-07	Water	06/19/09 13:00	06/19/09 16:30	
RW-5(23)	RSF0858-08	Water	06/19/09 15:30	06/19/09 16:30	
RW-5	RSF0858-09	Water	06/19/09 16:05	06/19/09 16:30	

Kleinfelder, Inc.
6390 Fly Road 2nd Floor
East Syracuse, NY 13057

Work Order: RSF0858
Project: Sanofi-Aventis Sampling
Project Number: NA

Received: 06/19/09
Reported: 07/06/09 14:43

Analytical Report

Analyte	Sample Result	Data Qualifiers	RL	MDL	Units	Dil Fac	Date Analyzed	Lab Tech	Batch	Method
Sample ID: RSF0858-01 (MW-18 - Water)						Sampled: 06/19/09 10:00		Recvd: 06/19/09 16:30		
<u>Volatile Organic Compounds</u>										
1,1-Dichloroethene	ND		5.0	0.85	ug/L	1.00	06/26/09 00:52	MF	9F25108	624
2-Butanone	12	J	25	3.6	ug/L	1.00	06/26/09 00:52	MF	9F25108	624
Acetone	ND		25	3.7	ug/L	1.00	06/26/09 00:52	MF	9F25108	624
Benzene	ND		5.0	0.60	ug/L	1.00	06/26/09 00:52	MF	9F25108	624
Carbon disulfide	ND		5.0	0.88	ug/L	1.00	06/26/09 00:52	MF	9F25108	624
Chloroform	ND		5.0	0.54	ug/L	1.00	06/26/09 00:52	MF	9F25108	624
Chloromethane	ND		5.0	0.64	ug/L	1.00	06/26/09 00:52	MF	9F25108	624
cis-1,2-Dichloroethene	ND		5.0	0.57	ug/L	1.00	06/26/09 00:52	MF	9F25108	624
Dichlorodifluoromethane	ND		5.0	0.28	ug/L	1.00	06/26/09 00:52	MF	9F25108	624
Ethyl Acetate	ND		5.0	0.53	ug/L	1.00	06/26/09 00:52	MF	9F25108	624
Isopropyl Acetate	ND		5.0	0.56	ug/L	1.00	06/26/09 00:52	MF	9F25108	624
Methylene Chloride	5.7	B	5.0	0.81	ug/L	1.00	06/26/09 00:52	MF	9F25108	624
n-Amyl Acetate	ND		5.0	0.36	ug/L	1.00	06/26/09 00:52	MF	9F25108	624
trans-1,2-Dichloroethene	ND		5.0	0.59	ug/L	1.00	06/26/09 00:52	MF	9F25108	624
Xylenes, total	ND		10	1.1	ug/L	1.00	06/26/09 00:52	MF	9F25108	624
1,2-Dichloroethane-d4	99 %		<i>Surr Limits: (88-132%)</i>				06/26/09 00:52	MF	9F25108	624
4-Bromofluorobenzene	86 %		<i>Surr Limits: (78-122%)</i>				06/26/09 00:52	MF	9F25108	624
Toluene-d8	100 %		<i>Surr Limits: (87-110%)</i>				06/26/09 00:52	MF	9F25108	624

Kleinfelder, Inc.
6390 Fly Road 2nd Floor
East Syracuse, NY 13057

Work Order: RSF0858
Project: Sanofi-Aventis Sampling
Project Number: NA

Received: 06/19/09
Reported: 07/06/09 14:43

Analytical Report

Analyte	Sample Result	Data Qualifiers	RL	MDL	Units	Dil Fac	Date Analyzed	Lab Tech	Batch	Method
Sample ID: RSF0858-02 (MW-D7 - Water)						Sampled: 06/19/09 09:35		Recvd: 06/19/09 16:30		
<u>Volatile Organic Compounds</u>										
1,1-Dichloroethene	ND		5.0	0.85	ug/L	1.00	06/26/09 01:17	MF	9F25108	624
2-Butanone	ND		25	3.6	ug/L	1.00	06/26/09 01:17	MF	9F25108	624
Acetone	ND		25	3.7	ug/L	1.00	06/26/09 01:17	MF	9F25108	624
Benzene	ND		5.0	0.60	ug/L	1.00	06/26/09 01:17	MF	9F25108	624
Carbon disulfide	ND		5.0	0.88	ug/L	1.00	06/26/09 01:17	MF	9F25108	624
Chloroform	ND		5.0	0.54	ug/L	1.00	06/26/09 01:17	MF	9F25108	624
Chloromethane	ND		5.0	0.64	ug/L	1.00	06/26/09 01:17	MF	9F25108	624
cis-1,2-Dichloroethene	ND		5.0	0.57	ug/L	1.00	06/26/09 01:17	MF	9F25108	624
Dichlorodifluoromethane	ND		5.0	0.28	ug/L	1.00	06/26/09 01:17	MF	9F25108	624
Ethyl Acetate	ND		5.0	0.53	ug/L	1.00	06/26/09 01:17	MF	9F25108	624
Isopropyl Acetate	ND		5.0	0.56	ug/L	1.00	06/26/09 01:17	MF	9F25108	624
Methylene Chloride	1.8	J, B	5.0	0.81	ug/L	1.00	06/26/09 01:17	MF	9F25108	624
n-Amyl Acetate	ND		5.0	0.36	ug/L	1.00	06/26/09 01:17	MF	9F25108	624
trans-1,2-Dichloroethene	ND		5.0	0.59	ug/L	1.00	06/26/09 01:17	MF	9F25108	624
Xylenes, total	ND		10	1.1	ug/L	1.00	06/26/09 01:17	MF	9F25108	624
1,2-Dichloroethane-d4	95 %		Surr Limits: (88-132%)				06/26/09 01:17	MF	9F25108	624
4-Bromofluorobenzene	92 %		Surr Limits: (78-122%)				06/26/09 01:17	MF	9F25108	624
Toluene-d8	105 %		Surr Limits: (87-110%)				06/26/09 01:17	MF	9F25108	624

Kleinfelder, Inc.
6390 Fly Road 2nd Floor
East Syracuse, NY 13057

Work Order: RSF0858
Project: Sanofi-Aventis Sampling
Project Number: NA

Received: 06/19/09
Reported: 07/06/09 14:43

Analytical Report

Analyte	Sample Result	Data Qualifiers	RL	MDL	Units	Dil Fac	Date Analyzed	Lab Tech	Batch	Method
Sample ID: RSF0858-03 (MW-D8 - Water)						Sampled: 06/19/09 10:35		Recvd: 06/19/09 16:30		
Volatile Organic Compounds										
1,1-Dichloroethene	ND	D08	2500	430	ug/L	500	07/02/09 13:46	TRB	9G02007	624
2-Butanone	ND	D08	12000	1800	ug/L	500	07/02/09 13:46	TRB	9G02007	624
Acetone	ND	D08	12000	1900	ug/L	500	07/02/09 13:46	TRB	9G02007	624
Benzene	ND	D08	2500	300	ug/L	500	07/02/09 13:46	TRB	9G02007	624
Carbon disulfide	ND	D08	2500	440	ug/L	500	07/02/09 13:46	TRB	9G02007	624
Chloroform	ND	D08	2500	270	ug/L	500	07/02/09 13:46	TRB	9G02007	624
Chloromethane	ND	D08	2500	320	ug/L	500	07/02/09 13:46	TRB	9G02007	624
cis-1,2-Dichloroethene	ND	D08	2500	290	ug/L	500	07/02/09 13:46	TRB	9G02007	624
Dichlorodifluoromethane	ND	D08	2500	140	ug/L	500	07/02/09 13:46	TRB	9G02007	624
Ethyl Acetate	ND	D08	2500	260	ug/L	500	07/02/09 13:46	TRB	9G02007	624
Isopropyl Acetate	ND	D08	2500	280	ug/L	500	07/02/09 13:46	TRB	9G02007	624
Methylene Chloride	29000	D08,B	2500	410	ug/L	500	07/02/09 13:46	TRB	9G02007	624
n-Amyl Acetate	ND	D08	2500	180	ug/L	500	07/02/09 13:46	TRB	9G02007	624
trans-1,2-Dichloroethene	ND	D08	2500	290	ug/L	500	07/02/09 13:46	TRB	9G02007	624
Xylenes, total	ND	D08	5000	540	ug/L	500	07/02/09 13:46	TRB	9G02007	624
1,2-Dichloroethane-d4	104 %	D08	Surr Limits: (88-132%)				07/02/09 13:46	TRB	9G02007	624
4-Bromofluorobenzene	96 %	D08	Surr Limits: (78-122%)				07/02/09 13:46	TRB	9G02007	624
Toluene-d8	103 %	D08	Surr Limits: (87-110%)				07/02/09 13:46	TRB	9G02007	624

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Analytical Report

Analyte	Sample Result	Data Qualifiers	RL	MDL	Units	Dil Fac	Date Analyzed	Lab Tech	Batch	Method
Sample ID: RSF0858-04 (MW-D12 - Water)						Sampled: 06/19/09 14:30		Recvd: 06/19/09 16:30		
<u>Volatile Organic Compounds</u>										
1,1-Dichloroethene	ND		5.0	0.85	ug/L	1.00	06/26/09 02:07	MF	9F25108	624
2-Butanone	ND		25	3.6	ug/L	1.00	06/26/09 02:07	MF	9F25108	624
Acetone	ND		25	3.7	ug/L	1.00	06/26/09 02:07	MF	9F25108	624
Benzene	ND		5.0	0.60	ug/L	1.00	06/26/09 02:07	MF	9F25108	624
Carbon disulfide	ND		5.0	0.88	ug/L	1.00	06/26/09 02:07	MF	9F25108	624
Chloroform	ND		5.0	0.54	ug/L	1.00	06/26/09 02:07	MF	9F25108	624
Chloromethane	ND		5.0	0.64	ug/L	1.00	06/26/09 02:07	MF	9F25108	624
cis-1,2-Dichloroethene	ND		5.0	0.57	ug/L	1.00	06/26/09 02:07	MF	9F25108	624
Dichlorodifluoromethane	ND		5.0	0.28	ug/L	1.00	06/26/09 02:07	MF	9F25108	624
Ethyl Acetate	ND		5.0	0.53	ug/L	1.00	06/26/09 02:07	MF	9F25108	624
Isopropyl Acetate	ND		5.0	0.56	ug/L	1.00	06/26/09 02:07	MF	9F25108	624
Methylene Chloride	0.85	J, B	5.0	0.81	ug/L	1.00	06/26/09 02:07	MF	9F25108	624
n-Amyl Acetate	ND		5.0	0.36	ug/L	1.00	06/26/09 02:07	MF	9F25108	624
trans-1,2-Dichloroethene	ND		5.0	0.59	ug/L	1.00	06/26/09 02:07	MF	9F25108	624
Xylenes, total	ND		10	1.1	ug/L	1.00	06/26/09 02:07	MF	9F25108	624
<i>1,2-Dichloroethane-d4</i>	<i>100 %</i>		<i>Surr Limits: (88-132%)</i>				<i>06/26/09 02:07</i>	<i>MF</i>	<i>9F25108</i>	<i>624</i>
<i>4-Bromofluorobenzene</i>	<i>99 %</i>		<i>Surr Limits: (78-122%)</i>				<i>06/26/09 02:07</i>	<i>MF</i>	<i>9F25108</i>	<i>624</i>
<i>Toluene-d8</i>	<i>104 %</i>		<i>Surr Limits: (87-110%)</i>				<i>06/26/09 02:07</i>	<i>MF</i>	<i>9F25108</i>	<i>624</i>

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Analytical Report

Analyte	Sample Result	Data Qualifiers	RL	MDL	Units	Dil Fac	Date Analyzed	Lab Tech	Batch	Method
Sample ID: RSF0858-05 (MW-D13 - Water)						Sampled: 06/19/09 12:30		Recvd: 06/19/09 16:30		
<u>Volatile Organic Compounds</u>										
1,1-Dichloroethene	ND		5.0	0.85	ug/L	1.00	06/26/09 02:33	MF	9F25108	624
2-Butanone	ND		25	3.6	ug/L	1.00	06/26/09 02:33	MF	9F25108	624
Acetone	ND		25	3.7	ug/L	1.00	06/26/09 02:33	MF	9F25108	624
Benzene	ND		5.0	0.60	ug/L	1.00	06/26/09 02:33	MF	9F25108	624
Carbon disulfide	ND		5.0	0.88	ug/L	1.00	06/26/09 02:33	MF	9F25108	624
Chloroform	ND		5.0	0.54	ug/L	1.00	06/26/09 02:33	MF	9F25108	624
Chloromethane	ND		5.0	0.64	ug/L	1.00	06/26/09 02:33	MF	9F25108	624
cis-1,2-Dichloroethene	ND		5.0	0.57	ug/L	1.00	06/26/09 02:33	MF	9F25108	624
Dichlorodifluoromethane	ND		5.0	0.28	ug/L	1.00	06/26/09 02:33	MF	9F25108	624
Ethyl Acetate	ND		5.0	0.53	ug/L	1.00	06/26/09 02:33	MF	9F25108	624
Isopropyl Acetate	ND		5.0	0.56	ug/L	1.00	06/26/09 02:33	MF	9F25108	624
Methylene Chloride	1.2	J, B	5.0	0.81	ug/L	1.00	06/26/09 02:33	MF	9F25108	624
n-Amyl Acetate	ND		5.0	0.36	ug/L	1.00	06/26/09 02:33	MF	9F25108	624
trans-1,2-Dichloroethene	ND		5.0	0.59	ug/L	1.00	06/26/09 02:33	MF	9F25108	624
Xylenes, total	ND		10	1.1	ug/L	1.00	06/26/09 02:33	MF	9F25108	624
1,2-Dichloroethane-d4	100 %		<i>Surr Limits: (88-132%)</i>				06/26/09 02:33	MF	9F25108	624
4-Bromofluorobenzene	86 %		<i>Surr Limits: (78-122%)</i>				06/26/09 02:33	MF	9F25108	624
Toluene-d8	100 %		<i>Surr Limits: (87-110%)</i>				06/26/09 02:33	MF	9F25108	624

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Analytical Report

Analyte	Sample Result	Data Qualifiers	RL	MDL	Units	Dil Fac	Date Analyzed	Lab Tech	Batch	Method
Sample ID: RSF0858-06 (RW-2 - Water)						Sampled: 06/19/09 11:10		Recvd: 06/19/09 16:30		
<u>Volatile Organic Compounds</u>										
1,1-Dichloroethene	ND		5.0	0.85	ug/L	1.00	06/26/09 02:57	MF	9F25108	624
2-Butanone	ND		25	3.6	ug/L	1.00	06/26/09 02:57	MF	9F25108	624
Acetone	ND		25	3.7	ug/L	1.00	06/26/09 02:57	MF	9F25108	624
Benzene	ND		5.0	0.60	ug/L	1.00	06/26/09 02:57	MF	9F25108	624
Carbon disulfide	ND		5.0	0.88	ug/L	1.00	06/26/09 02:57	MF	9F25108	624
Chloroform	ND		5.0	0.54	ug/L	1.00	06/26/09 02:57	MF	9F25108	624
Chloromethane	ND		5.0	0.64	ug/L	1.00	06/26/09 02:57	MF	9F25108	624
cis-1,2-Dichloroethene	ND		5.0	0.57	ug/L	1.00	06/26/09 02:57	MF	9F25108	624
Dichlorodifluoromethane	ND		5.0	0.28	ug/L	1.00	06/26/09 02:57	MF	9F25108	624
Ethyl Acetate	ND		5.0	0.53	ug/L	1.00	06/26/09 02:57	MF	9F25108	624
Isopropyl Acetate	ND		5.0	0.56	ug/L	1.00	06/26/09 02:57	MF	9F25108	624
Methylene Chloride	2.8	J, B	5.0	0.81	ug/L	1.00	06/26/09 02:57	MF	9F25108	624
n-Amyl Acetate	ND		5.0	0.36	ug/L	1.00	06/26/09 02:57	MF	9F25108	624
trans-1,2-Dichloroethene	ND		5.0	0.59	ug/L	1.00	06/26/09 02:57	MF	9F25108	624
Xylenes, total	ND		10	1.1	ug/L	1.00	06/26/09 02:57	MF	9F25108	624
1,2-Dichloroethane-d4	98 %		<i>Surr Limits: (88-132%)</i>				06/26/09 02:57	MF	9F25108	624
4-Bromofluorobenzene	92 %		<i>Surr Limits: (78-122%)</i>				06/26/09 02:57	MF	9F25108	624
Toluene-d8	103 %		<i>Surr Limits: (87-110%)</i>				06/26/09 02:57	MF	9F25108	624

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Analytical Report

Analyte	Sample Result	Data Qualifiers	RL	MDL	Units	Dil Fac	Date Analyzed	Lab Tech	Batch	Method
Sample ID: RSF0858-07 (RW-4 - Water)						Sampled: 06/19/09 13:00		Recvd: 06/19/09 16:30		
<u>Volatile Organic Compounds</u>										
1,1-Dichloroethene	ND	D08	10	1.7	ug/L	2.00	07/02/09 14:11	TRB	9G02007	624
2-Butanone	ND	D08	50	7.2	ug/L	2.00	07/02/09 14:11	TRB	9G02007	624
Acetone	ND	D08	50	7.4	ug/L	2.00	07/02/09 14:11	TRB	9G02007	624
Benzene	ND	D08	10	1.2	ug/L	2.00	07/02/09 14:11	TRB	9G02007	624
Carbon disulfide	ND	D08	10	1.8	ug/L	2.00	07/02/09 14:11	TRB	9G02007	624
Chloroform	ND	D08	10	1.1	ug/L	2.00	07/02/09 14:11	TRB	9G02007	624
Chloromethane	ND	D08	10	1.3	ug/L	2.00	07/02/09 14:11	TRB	9G02007	624
cis-1,2-Dichloroethene	ND	D08	10	1.1	ug/L	2.00	07/02/09 14:11	TRB	9G02007	624
Dichlorodifluoromethane	ND	D08	10	0.55	ug/L	2.00	07/02/09 14:11	TRB	9G02007	624
Ethyl Acetate	ND	D08	10	1.1	ug/L	2.00	07/02/09 14:11	TRB	9G02007	624
Isopropyl Acetate	ND	D08	10	1.1	ug/L	2.00	07/02/09 14:11	TRB	9G02007	624
Methylene Chloride	78	D08,B	10	1.6	ug/L	2.00	07/02/09 14:11	TRB	9G02007	624
n-Amyl Acetate	ND	D08	10	0.72	ug/L	2.00	07/02/09 14:11	TRB	9G02007	624
trans-1,2-Dichloroethene	ND	D08	10	1.2	ug/L	2.00	07/02/09 14:11	TRB	9G02007	624
Xylenes, total	ND	D08	20	2.2	ug/L	2.00	07/02/09 14:11	TRB	9G02007	624
1,2-Dichloroethane-d4	104 %	D08	Surr Limits: (88-132%)				07/02/09 14:11	TRB	9G02007	624
4-Bromofluorobenzene	92 %	D08	Surr Limits: (78-122%)				07/02/09 14:11	TRB	9G02007	624
Toluene-d8	102 %	D08	Surr Limits: (87-110%)				07/02/09 14:11	TRB	9G02007	624

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Analytical Report

Analyte	Sample Result	Data Qualifiers	RL	MDL	Units	Dil Fac	Date Analyzed	Lab Tech	Batch	Method
Sample ID: RSF0858-08 (RW-5(23) - Water)						Sampled: 06/19/09 15:30		Recvd: 06/19/09 16:30		
<u>Volatile Organic Compounds</u>										
1,1-Dichloroethene	ND		5.0	0.85	ug/L	1.00	07/02/09 14:37	TRB	9G02007	624
2-Butanone	ND		25	3.6	ug/L	1.00	07/02/09 14:37	TRB	9G02007	624
Acetone	ND		25	3.7	ug/L	1.00	07/02/09 14:37	TRB	9G02007	624
Benzene	ND		5.0	0.60	ug/L	1.00	07/02/09 14:37	TRB	9G02007	624
Carbon disulfide	ND		5.0	0.88	ug/L	1.00	07/02/09 14:37	TRB	9G02007	624
Chloroform	ND		5.0	0.54	ug/L	1.00	07/02/09 14:37	TRB	9G02007	624
Chloromethane	ND		5.0	0.64	ug/L	1.00	07/02/09 14:37	TRB	9G02007	624
cis-1,2-Dichloroethene	ND		5.0	0.57	ug/L	1.00	07/02/09 14:37	TRB	9G02007	624
Dichlorodifluoromethane	ND		5.0	0.28	ug/L	1.00	07/02/09 14:37	TRB	9G02007	624
Ethyl Acetate	ND		5.0	0.53	ug/L	1.00	07/02/09 14:37	TRB	9G02007	624
Isopropyl Acetate	ND		5.0	0.56	ug/L	1.00	07/02/09 14:37	TRB	9G02007	624
Methylene Chloride	0.94	J, B	5.0	0.81	ug/L	1.00	07/02/09 14:37	TRB	9G02007	624
n-Amyl Acetate	ND		5.0	0.36	ug/L	1.00	07/02/09 14:37	TRB	9G02007	624
trans-1,2-Dichloroethene	ND		5.0	0.59	ug/L	1.00	07/02/09 14:37	TRB	9G02007	624
Xylenes, total	ND		10	1.1	ug/L	1.00	07/02/09 14:37	TRB	9G02007	624
<i>1,2-Dichloroethane-d4</i>	<i>104 %</i>		<i>Surr Limits: (88-132%)</i>				<i>07/02/09 14:37</i>	<i>TRB</i>	<i>9G02007</i>	<i>624</i>
<i>4-Bromofluorobenzene</i>	<i>93 %</i>		<i>Surr Limits: (78-122%)</i>				<i>07/02/09 14:37</i>	<i>TRB</i>	<i>9G02007</i>	<i>624</i>
<i>Toluene-d8</i>	<i>104 %</i>		<i>Surr Limits: (87-110%)</i>				<i>07/02/09 14:37</i>	<i>TRB</i>	<i>9G02007</i>	<i>624</i>

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Analytical Report

Analyte	Sample Result	Data Qualifiers	RL	MDL	Units	Dil Fac	Date Analyzed	Lab Tech	Batch	Method
Sample ID: RSF0858-09 (RW-5 - Water)						Sampled: 06/19/09 16:05		Recvd: 06/19/09 16:30		
<u>Volatile Organic Compounds</u>										
1,1-Dichloroethene	ND		5.0	0.85	ug/L	1.00	07/02/09 15:02	TRB	9G02007	624
2-Butanone	ND		25	3.6	ug/L	1.00	07/02/09 15:02	TRB	9G02007	624
Acetone	ND		25	3.7	ug/L	1.00	07/02/09 15:02	TRB	9G02007	624
Benzene	ND		5.0	0.60	ug/L	1.00	07/02/09 15:02	TRB	9G02007	624
Carbon disulfide	ND		5.0	0.88	ug/L	1.00	07/02/09 15:02	TRB	9G02007	624
Chloroform	ND		5.0	0.54	ug/L	1.00	07/02/09 15:02	TRB	9G02007	624
Chloromethane	ND		5.0	0.64	ug/L	1.00	07/02/09 15:02	TRB	9G02007	624
cis-1,2-Dichloroethene	ND		5.0	0.57	ug/L	1.00	07/02/09 15:02	TRB	9G02007	624
Dichlorodifluoromethane	ND		5.0	0.28	ug/L	1.00	07/02/09 15:02	TRB	9G02007	624
Ethyl Acetate	ND		5.0	0.53	ug/L	1.00	07/02/09 15:02	TRB	9G02007	624
Isopropyl Acetate	ND		5.0	0.56	ug/L	1.00	07/02/09 15:02	TRB	9G02007	624
Methylene Chloride	2.2	J, B	5.0	0.81	ug/L	1.00	07/02/09 15:02	TRB	9G02007	624
n-Amyl Acetate	ND		5.0	0.36	ug/L	1.00	07/02/09 15:02	TRB	9G02007	624
trans-1,2-Dichloroethene	ND		5.0	0.59	ug/L	1.00	07/02/09 15:02	TRB	9G02007	624
Xylenes, total	ND		10	1.1	ug/L	1.00	07/02/09 15:02	TRB	9G02007	624
1,2-Dichloroethane-d4	104 %		<i>Surr Limits: (88-132%)</i>				07/02/09 15:02	TRB	9G02007	624
4-Bromofluorobenzene	95 %		<i>Surr Limits: (78-122%)</i>				07/02/09 15:02	TRB	9G02007	624
Toluene-d8	102 %		<i>Surr Limits: (87-110%)</i>				07/02/09 15:02	TRB	9G02007	624

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SAMPLE EXTRACTION DATA

Parameter	Batch	Lab Number	Wt/Vol Extracte	Units	Extract Volume	Units	Date Prepared	Lab Tech	Extraction Method
Volatile Organic Compounds									
624	9F25108	RSF0858-01	5.00	mL	5.00	mL	06/25/09 17:19	MAF	5030B MS
624	9F25108	RSF0858-02	5.00	mL	5.00	mL	06/25/09 17:19	MAF	5030B MS
624	9F25108	RSF0858-04	5.00	mL	5.00	mL	06/25/09 17:19	MAF	5030B MS
624	9F25108	RSF0858-05	5.00	mL	5.00	mL	06/25/09 17:19	MAF	5030B MS
624	9F25108	RSF0858-06	5.00	mL	5.00	mL	06/25/09 17:19	MAF	5030B MS
624	9G02007	RSF0858-03	5.00	mL	5.00	mL	07/02/09 08:40	TRB	5030B MS
624	9G02007	RSF0858-07	5.00	mL	5.00	mL	07/02/09 08:40	TRB	5030B MS
624	9G02007	RSF0858-08	5.00	mL	5.00	mL	07/02/09 08:40	TRB	5030B MS
624	9G02007	RSF0858-09	5.00	mL	5.00	mL	07/02/09 08:40	TRB	5030B MS

Kleinfelder, Inc.
6390 Fly Road 2nd Floor
East Syracuse, NY 13057

Work Order: RSF0858
Project: Sanofi-Aventis Sampling
Project Number: NA

Received: 06/19/09
Reported: 07/06/09 14:43

LABORATORY QC DATA

Analyte	Source Result	Spike Level	RL	MDL	Units	Result	% REC	% REC Limits	% RPD	RPD Limit	Data Qualifiers
<u>Volatile Organic Compounds</u>											
Blank Analyzed: 06/25/09 (Lab Number:9F25108-BLK1, Batch: 9F25108)											
1,1-Dichloroethene			5.0	0.85	ug/L	ND					
2-Butanone (MEK)			25	3.6	ug/L	ND					
Acetone			25	3.7	ug/L	ND					
Benzene			5.0	0.60	ug/L	ND					
Carbon disulfide			5.0	0.88	ug/L	ND					
Chloroform			5.0	0.54	ug/L	ND					
Chloromethane			5.0	0.64	ug/L	ND					
cis-1,2-Dichloroethene			5.0	0.57	ug/L	ND					
Dichlorodifluoromethane			5.0	0.28	ug/L	ND					
Ethyl Acetate			5.0	0.53	ug/L	ND					
Isopropyl Acetate			5.0	0.56	ug/L	ND					
Methylene Chloride			5.0	0.81	ug/L	0.81					J
n-Amyl Acetate			5.0	0.36	ug/L	ND					
trans-1,2-Dichloroethene			5.0	0.59	ug/L	ND					
Xylenes, total			10	1.1	ug/L	ND					

<i>Surrogate:</i>					ug/L		98	88-132			
<i>1,2-Dichloroethane-d4</i>					ug/L		96	78-122			
<i>Surrogate:</i>					ug/L						
<i>4-Bromofluorobenzene</i>					ug/L		103	87-110			
<i>Surrogate: Toluene-d8</i>					ug/L						

LCS Analyzed: 06/25/09 (Lab Number:9F25108-BS1, Batch: 9F25108)

1,1,1-Trichloroethane	20	5.0	0.73	ug/L	20.2	101	75-125				
1,1,2,2-Tetrachloroethane	20	5.0	1.2	ug/L	20.7	104	61-140				
1,1,2-Trichloroethane	20	5.0	0.48	ug/L	21.6	108	71-129				
1,1-Dichloroethane	20	5.0	0.59	ug/L	21.8	109	73-128				
1,1-Dichloroethene	20	5.0	0.85	ug/L	20.8	104	51-150				
1,2-Dichlorobenzene	20	5.0	0.44	ug/L	21.4	107	63-137				
1,2-Dichloroethane	20	5.0	0.60	ug/L	20.3	101	68-132				
1,2-Dichloropropane	20	5.0	0.61	ug/L	21.6	108	34-166				
1,3-Dichlorobenzene	20	5.0	0.54	ug/L	20.2	101	73-127				
1,4-Dichlorobenzene	20	5.0	0.51	ug/L	19.9	100	63-137				
2-Butanone (MEK)	100	25	3.6	ug/L	91.6	92	77-121				
2-Chloroethyl vinyl ether	100	25	3.7	ug/L	93.0	93	1-224				
2-Chlorotoluene	20	5.0	0.61	ug/L	20.2	101	55-145				
4-Chlorotoluene	20	5.0	0.64	ug/L	21.4	107	55-145				
Acetone	100	25	3.7	ug/L	95.0	95					
Acrolein	400	100	17	ug/L	720	180	62-141				
Acrylonitrile	100	100	4.0	ug/L	91.3	91	53-143				J

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LABORATORY QC DATA

Analyte	Source Result	Spike Level	RL	MDL	Units	Result	% REC	% REC Limits	% RPD	RPD Limit	Data Qualifiers
<u>Volatile Organic Compounds</u>											
LCS Analyzed: 06/25/09 (Lab Number:9F25108-BS1, Batch: 9F25108)											
Benzene		20	5.0	0.60	ug/L	22.7	113	64-136			
Bromodichloromethane		20	5.0	0.54	ug/L	21.9	110	66-135			
Bromoform		20	5.0	0.47	ug/L	20.0	100	73-129			
Bromomethane		20	5.0	1.2	ug/L	23.6	118	14-186			
Carbon Tetrachloride		20	5.0	0.51	ug/L	20.2	101	73-127			
Chlorobenzene		20	5.0	0.48	ug/L	22.1	110	66-134			
Chlorodibromomethane		20	5.0	0.41	ug/L	18.8	94	68-133			
Chloroethane		20	5.0	0.87	ug/L	22.6	113	38-162			
Chloroform		20	5.0	0.54	ug/L	21.6	108	68-133			
Chloromethane		20	5.0	0.64	ug/L	24.9	124	1-204			
Chloroprene			5.0	0.34	ug/L	ND					
cis-1,2-Dichloroethene		20	5.0	0.57	ug/L	22.1	110	74-124			
cis-1,3-Dichloropropene		20	5.0	0.57	ug/L	21.6	108	24-176			
Dichlorodifluoromethane		20	5.0	0.28	ug/L	27.4	137	55-123			
Ethylbenzene		20	5.0	0.46	ug/L	21.8	109	59-141			
Methylene Chloride		20	5.0	0.81	ug/L	20.5	102	61-140			B
Tetrachloroethene		20	5.0	0.34	ug/L	21.1	105	74-127			
Toluene		20	5.0	0.45	ug/L	22.3	111	75-126			
trans-1,2-Dichloroethene		20	5.0	0.59	ug/L	23.7	119	70-131			
trans-1,3-Dichloropropene		20	5.0	0.44	ug/L	20.4	102	50-150			
Trichloroethene		20	5.0	0.60	ug/L	21.4	107	67-134			
Trichlorofluoromethane		20	5.0	0.45	ug/L	24.1	121	48-152			
Vinyl chloride		20	5.0	0.75	ug/L	24.5	122	4-196			
<i>Surrogate:</i>					<i>ug/L</i>		95	88-132			
<i>1,2-Dichloroethane-d4</i>											
<i>Surrogate:</i>					<i>ug/L</i>		101	78-122			
<i>4-Bromofluorobenzene</i>											
<i>Surrogate: Toluene-d8</i>					<i>ug/L</i>		101	87-110			

Volatile Organic Compounds

Blank Analyzed: 07/02/09 (Lab Number:9G02007-BLK1, Batch: 9G02007)

1,1-Dichloroethene		5.0	0.85	ug/L	ND
2-Butanone (MEK)		25	3.6	ug/L	ND
Acetone		25	3.7	ug/L	ND
Benzene		5.0	0.60	ug/L	ND
Carbon disulfide		5.0	0.88	ug/L	ND
Chloroform		5.0	0.54	ug/L	ND
Chloromethane		5.0	0.64	ug/L	ND

TestAmerica Buffalo

10 Hazelwood Drive Amherst, NY 14228 tel 716-691-2600 fax 716-691-7991

www.testamericainc.com

Kleinfelder, Inc.
6390 Fly Road 2nd Floor
East Syracuse, NY 13057

Work Order: RSF0858
Project: Sanofi-Aventis Sampling
Project Number: NA

Received: 06/19/09
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LABORATORY QC DATA

Analyte	Source Result	Spike Level	RL	MDL	Units	Result	% REC	% REC Limits	% RPD	RPD Limit	Data Qualifiers
<u>Volatile Organic Compounds</u>											
Blank Analyzed: 07/02/09 (Lab Number:9G02007-BLK1, Batch: 9G02007)											
cis-1,2-Dichloroethene			5.0	0.57	ug/L	ND					
Dichlorodifluoromethane			5.0	0.28	ug/L	ND					
Ethyl Acetate			5.0	0.53	ug/L	ND					
Isopropyl Acetate			5.0	0.56	ug/L	ND					
Methylene Chloride			5.0	0.81	ug/L	0.89					J
n-Amyl Acetate			5.0	0.36	ug/L	ND					
trans-1,2-Dichloroethene			5.0	0.59	ug/L	ND					
Xylenes, total			10	1.1	ug/L	ND					
<i>Surrogate:</i>					ug/L		102	88-132			
<i>1,2-Dichloroethane-d4</i>											
<i>Surrogate:</i>					ug/L		94	78-122			
<i>4-Bromofluorobenzene</i>											
<i>Surrogate: Toluene-d8</i>					ug/L		101	87-110			
LCS Analyzed: 07/02/09 (Lab Number:9G02007-BS1, Batch: 9G02007)											
1,1,1-Trichloroethane		20	5.0	0.73	ug/L	21.0	105	75-125			
1,1,1,2-Tetrachloroethane		20	5.0	1.2	ug/L	21.5	107	61-140			
1,1,2-Trichloroethane		20	5.0	0.48	ug/L	22.0	110	71-129			
1,1-Dichloroethane		20	5.0	0.59	ug/L	22.2	111	73-128			
1,1-Dichloroethene		20	5.0	0.85	ug/L	20.2	101	51-150			
1,2-Dichlorobenzene		20	5.0	0.44	ug/L	20.6	103	63-137			
1,2-Dichloroethane		20	5.0	0.60	ug/L	22.8	114	68-132			
1,2-Dichloropropane		20	5.0	0.61	ug/L	22.8	114	34-166			
1,3-Dichlorobenzene		20	5.0	0.54	ug/L	21.2	106	73-127			
1,4-Dichlorobenzene		20	5.0	0.51	ug/L	20.8	104	63-137			
2-Butanone (MEK)		100	25	3.6	ug/L	93.1	93	77-121			
2-Chloroethyl vinyl ether		100	25	3.7	ug/L	99.4	99	1-224			
2-Chlorotoluene		20	5.0	0.61	ug/L	22.6	113	55-145			
4-Chlorotoluene		20	5.0	0.64	ug/L	21.9	109	55-145			
Acetone		100	25	3.7	ug/L	96.8	97				
Acrolein		400	100	17	ug/L	742	186	62-141			
Acrylonitrile		100	100	4.0	ug/L	98.4	98	53-143			J
Benzene		20	5.0	0.60	ug/L	22.6	113	64-136			
Bromodichloromethane		20	5.0	0.54	ug/L	22.2	111	66-135			
Bromoform		20	5.0	0.47	ug/L	20.6	103	73-129			
Bromomethane		20	5.0	1.2	ug/L	22.1	110	14-186			
Carbon Tetrachloride		20	5.0	0.51	ug/L	20.7	103	73-127			
Chlorobenzene		20	5.0	0.48	ug/L	22.8	114	66-134			
Chlorodibromomethane		20	5.0	0.41	ug/L	21.9	110	68-133			

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LABORATORY QC DATA

Analyte	Source Result	Spike Level	RL	MDL	Units	Result	% REC	% REC Limits	% RPD	RPD Limit	Data Qualifiers
<u>Volatile Organic Compounds</u>											
LCS Analyzed: 07/02/09 (Lab Number:9G02007-BS1, Batch: 9G02007)											
Chloroethane		20	5.0	0.87	ug/L	23.5	117	38-162			
Chloroform		20	5.0	0.54	ug/L	22.4	112	68-133			
Chloromethane		20	5.0	0.64	ug/L	28.1	141	1-204			
Chloroprene			5.0	0.34	ug/L	ND					
cis-1,2-Dichloroethene		20	5.0	0.57	ug/L	22.8	114	74-124			
cis-1,3-Dichloropropene		20	5.0	0.57	ug/L	21.8	109	24-176			
Dichlorodifluoromethane		20	5.0	0.28	ug/L	38.8	194	55-123			
Ethylbenzene		20	5.0	0.46	ug/L	22.6	113	59-141			
Methylene Chloride		20	5.0	0.81	ug/L	21.5	108	61-140			B
Tetrachloroethene		20	5.0	0.34	ug/L	21.8	109	74-127			
Toluene		20	5.0	0.45	ug/L	22.0	110	75-126			
trans-1,2-Dichloroethene		20	5.0	0.59	ug/L	22.4	112	70-131			
trans-1,3-Dichloropropene		20	5.0	0.44	ug/L	21.5	108	50-150			
Trichloroethene		20	5.0	0.60	ug/L	21.2	106	67-134			
Trichlorofluoromethane		20	5.0	0.45	ug/L	23.9	119	48-152			
Vinyl chloride		20	5.0	0.75	ug/L	27.0	135	4-196			
<i>Surrogate:</i>					<i>ug/L</i>		<i>101</i>	<i>88-132</i>			
<i>1,2-Dichloroethane-d4</i>											
<i>Surrogate:</i>					<i>ug/L</i>		<i>100</i>	<i>78-122</i>			
<i>4-Bromofluorobenzene</i>											
<i>Surrogate: Toluene-d8</i>					<i>ug/L</i>		<i>101</i>	<i>87-110</i>			



August 31, 2010

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: Second Quarter 2010 Environmental Effectiveness Monitoring Report
UCB Manufacturing Inc.
755 Jefferson Road Facility – Henrietta, New York
NYSDEC VCP Number: V00126-8

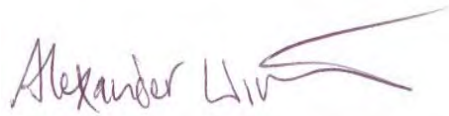
Dear Mr. MacLean:

On behalf of UCB Manufacturing Inc. (UCB), please find enclosed the Quarterly Environmental Effectiveness Monitoring Report for the above-referenced Site for the second quarter of 2010 covering the time period from April 1, 2010 through June 30, 2010. This report is being submitted in accordance with the requirements described in Section 6.2 of the draft Operation, Maintenance & Monitoring (OM&M) Plan.

On June 1, 2010, Kleinfelder East, Inc. (Kleinfelder) completed quarterly liquid gauging and groundwater sampling at the Site pursuant to Section 4.3 of the draft OM&M Plan. Groundwater quality analytical results are summarized on Table 1. Approval was granted by the NYSDEC to terminate system operation following the July operational period via email correspondence dated July 29, 2010.

If you require additional information or clarification, please contact the undersigned at (845) 567-6530 or Rick Bethel of Quantum Management Group, Inc. at (513) 314-7543.

Sincerely,
Kleinfelder East, Inc.



Alexander Wirth
Senior Project Geologist



Theodore Sikora
Project Geologist

Enclosure

Cc: Rick Bethel – Quantum Management Group, Inc.
John Lang – Quantum Management Group, Inc.
Michael Bogdan – Sanofi Aventis
Richard Ricci – Lowenstein Sandler PC
Jean McCreary – Nixon Peabody
Libby Ford – Nixon Peabody

755 Jefferson Road Site, Henrietta, NY
QUARTERLY ENVIRONMENTAL EFFECTIVENESS MONITORING REPORT

Site Address: Jefferson Road Facility	Regulatory Agency: NYSDEC – Region 8
755 Jefferson Road Henrietta, New York	Regulatory Contact: Gregory B. MacLean, P.E.
NYSDEC VCP No.: V00126-8	Consultant: Quantum Management Inc. (QMG), Kleinfelder East, Inc.
UCB Contact: Greg Light	Project Manager / Senior Project Geologist/Project Geologist: Rick Bethel (QMG), Alexander Wirth, Ted Sikora

Report Date: August 31, 2010.

Current Site Status: Active pharmaceutical manufacturing facility.

Monitoring Period: Second quarter 2010 (April 1 through June 30).

Work Performed: Quarterly environmental effectiveness monitoring pursuant to Section 4.3 of the draft Operation, Maintenance & Monitoring (OM&M) plan submitted to New York State Department of Environmental Conservation (NYSDEC) in May 2007 and the addendum to the OM&M Plan submitted in August 2007. Gauged 24 monitoring wells and collected groundwater samples from 8 monitoring wells on June 1, 2010. The Multi Phase Recovery System (MPRS) was off at the time of gauging and sampling.

Groundwater Monitoring:

Number of Wells:	24
Gauging Frequency:	Quarterly
Sampling Frequency:	Quarterly (8 wells ^{1st} , 2 nd & 4 th quarter / 16 wells 3 rd quarter)
Overburden Groundwater Depth:	1.57 feet to 40.22 feet

The MPRS was not operating during water level gauging and vacuum influence monitoring. All measurements were recorded and samples collected during non-operating conditions. Recovery had ceased on May 28th, 4 days before the level gauging and vacuum influence monitoring was done.

Shallow Groundwater Flow:	East
Intermediate Groundwater Flow:	East
Deep Groundwater Flow:	Variable

Shallow Groundwater Gradient:	0.03 feet per foot
Intermediate Groundwater Gradient:	0.06 feet per foot
Deep Groundwater Gradient:	0.41 feet per foot

Site Geology:

The top of bedrock is located approximately 55 feet below grade throughout the Site. Surficial deposits at the Site generally consist of reddish-brown silt and clay with lesser amounts of brown fine/coarse grained sand and gray rounded gravel. Coarser material (particularly sand) is more abundant at depths of 0 to 6 feet below grade compared to deeper intervals. The relative permeability of the unconsolidated deposits above bedrock at the Site is considered low.

MPRS Effectiveness:

The MPRS has continued to recover limited residual methylene chloride from areas of impacted soil and groundwater.

Since March 12, 2009 only three wells (MW-D8, RW-5 and RW-4) have been used as recovery wells as methylene chloride concentrations were highest in these wells based on previous sampling results.

Recovery wells RW-4 (intermediate depth), RW-5 (intermediate depth) and MW-D8 (intermediate depth) exhibited a decrease in methylene chloride concentrations compared to previous quarterly sampling results.

The dissolved phase concentrations have been reduced across the Site as depicted on Figures 7 through 20. The total volatile organic compound (VOC) vapor mass recovery rate steadily decreased since system start up to a steady state indicative of an asymptotic condition that was reached during the last quarter of 2008 and which continues today. During the investigation phase, the quantity of subsurface methylene chloride was estimated to be 171 pounds. As of June 30, 2010, an estimated total of 138.8 pounds of methylene chloride has been recovered since system startup. For the period from April 1, 2010 to June 30, 2010, the system recovered an estimated total of 0.3 pounds of methylene chloride. The system operated for a total of 509 hours during this quarter. The average calculated recovery rate of methylene chloride over this quarter is 0.0006 pounds per hour.

The VOC recovery rate of the MPRS has diminished to an asymptotic level. As discussed below, in accordance with NYSDEC approval, the MPRS system will no longer be operated.

Comments:

The wells were sampled in accordance with the ground water sampling procedures outlined in Section 4.3 of the Draft OM&M Plan and the addendum to the Draft OM&M Plan submitted in August 2007. Wells were sampled in order of the lowest historical methylene chloride concentration to the highest historical methylene chloride concentration. The pumps were decontaminated between wells in accordance with the addendum to Section 1.5 of the Site Specific Health and Safety Plan presented as Attachment A to the OM&M Plan contained within the Draft Final Engineering Report.

The groundwater contour maps in Figures 3 to 5 likely reflect the slow groundwater recovery rate in the silt and clay shallow, intermediate and deep unconsolidated deposits.

Recovery well RW-4 had a concentration of 17 µg/L this quarter as compared to 1.7J µg/L last quarter. Recovery well MW-D8 had a concentration of 4.1J µg/L this quarter as compared to 53 µg/L last quarter; this result is the lowest concentration to date, and below the established site clean-up level. Recovery well RW-5 had a concentration below the laboratory reporting limit (<5.0 µg/L) this quarter at both the 23' and 35' intervals as compared to 1.4J µg/L last quarter at the 23' interval and 1.5J µg/L at the 35' interval. Methylene chloride concentrations in groundwater collected from the other site-related monitoring wells are within or lower than historical levels.

Methylene chloride concentrations in groundwater are below NYSDEC standards in monitoring wells MW-18, MW-D7, MW-D12, MW-D13 and RW-2. These

wells showed no change in concentration and have remained below the NYSDEC standards.

Based on available data and consistently low recovery rates, asymptotic conditions have been reached. The existing remediation system is no longer exhibiting effective recovery of methylene chloride. A draft Methylene Chloride Area (MCA) closure plan which summarizes data and proposes a path towards closure of the MPRS has been submitted to NYSDEC. The document, as well as a companion draft petition for close out of the site-wide remedial project were discussed with the Department at a May 4, 2010 meeting. We are awaiting NYSDEC's formal comments on the closure-related documents submitted in May.

Approval was granted by the NYSDEC to terminate system operation following the July operational period via email correspondence dated July 29, 2010. Based on this approval, the MPRS system will no longer be operated.

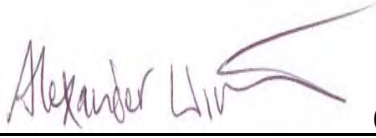
Attachments:

Table: Table 1 – Monitoring Well Gauging and Groundwater Analytical Data

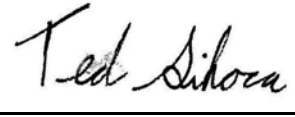
Figures: Figure 1 – Area Map
Figure 2 – Site Plan
Figure 3 – Groundwater Contour and Concentration Map – Shallow Wells
Figure 4 – Groundwater Contour and Concentration Map – Intermediate Wells
Figure 5 – Groundwater Contour and Concentration Map – Deep Wells
Figure 6 – Diagonal Well Potentiometric Conversion

Figures 7-20 – Dissolved Phase Concentration Trend Graphs (Concentrations less than the laboratory reporting levels are depicted as “0” µg/L.)

Appendices: Appendix A – Monthly Progress Reports – April, May, and June 2010



08/31/10
Alexander Wirth Date
Senior Project Geologist



08/31/10
Theodore Sikora Date
Project Geologist

TABLE

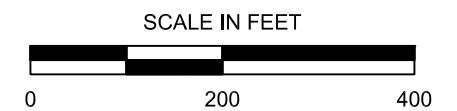
Table 1
MONITORING WELL GAUGING AND GROUNDWATER ANALYTICAL DATA

UCB Facility
755 Jefferson Road
Rochester, New York
June 18, 2007 through June 1, 2010

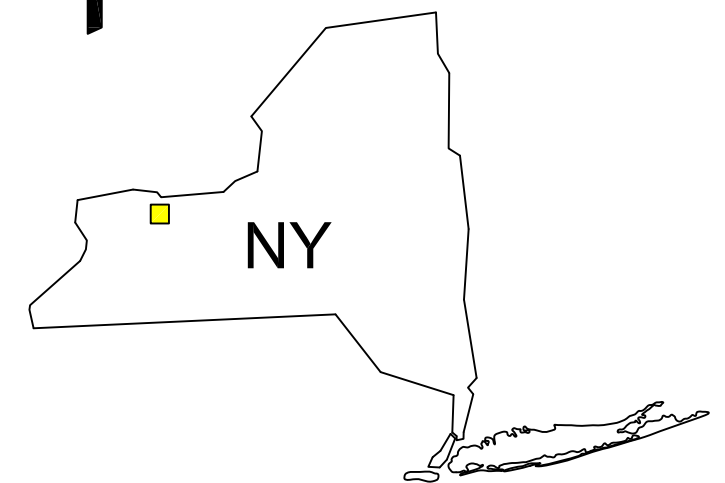
Sample ID	Date	TOC Elevation	Depth to Water	Corrected Water Table Elevation	Acetone	Methyl Ethyl Ketone	Dichloro- difluoromethane	cis-1,2- Dichloroethene	Ethyl acetate	Isopropyl acetate	n-Amyl Acetate	Total Xylenes	Benzene	Chloroform	Chloromethane	1,1- Dichloroethylene	trans-1,2- Dichloroethene	Carbon Disulfide	Methylene chloride
					50	50	5	5	-	-	5	1	7	5	5	5	50	5	
NYSDEC Standards																			
RW-5 (Recovery & sample)	8/26/2003	NG	NG	NG	8.1	2.4 J	BRL	0.88 J	NA	NA	NA	BRL	BRL	BRL	0.54 J	NA	NA	NA	120
	9/12/2005	NG	NG	NG	BRL	NA	NA	NA	NA	NA	NA	NA	BRL	NA	NA	NA	NA	NA	BRL
	2/23/2007	NG	NG	NG	BRL	BRL	NA	BRL	BRL	BRL	NA	BRL	BRL	BRL	BRL	NA	NA	NA	BRL
	6/20/2007	547.27	22.66	524.61	<25	<25	<5.0	<5.0	<5.0	<5.0	NA	<15	<5.0	<5.0	<5.0	3.3	<5.0	NA	45,000 D
	9/20/2007	547.27	28.97	518.30	<250	<250	NA	<50	<50	<50	NA	<150	<50	<50	<50	NA	NA	NA	1,000
	12/18/2007	547.27	3.05	544.22	<250	<250	<50	<50	<50	<50	<50	<150	<50	<50	<50	<50	<50	<50	770
	3/17/2008	547.27	14.13	537.28	360	<250	<50	<50	<50	<50	<50	<150	<50	<50	<50	<50	<50	<50	530
	6/4/2008	547.27	46.38	514.68	<250	<250	<50	<50	<50	<50	<50	<150	<50	<50	<50	<50	<50	<50	410
	9/10/2008	547.27	41.68	517.80	<12,000	<12,000	<2,500	<2,500	<2,500	<2,500	<2,500	<7,500	<2,500	<2,500	<2,500	<2,500	<2,500	<2,500	25,000
	12/17/2008	547.27	9.99	540.21	<2,500	<2,500	<500	<500	<500	<500	<500	<1,500	<500	<500	<500	<500	<500	<500	6,600
35	3/23/2009	547.27	45.36	515.20	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	22 B
	6/17/2009	547.27	42.89	516.94	<25	<25	<5.0	<5.0	<5.0	<5.0	<1.1	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	2.2 J.B
	9/17/2009	547.27	44.76	515.62	<120	<120	<25	<25	<25	<25	<25	<50	<25	<25	<25	<25	<25	<25	630
	12/17/2009	547.27	13.25	537.90	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	40
	3/10/2010	547.27	4.50	544.09	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	1.4 J
	6/1/2010	547.27	7.43	542.02	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
23	3/23/2009	547.27	45.36	515.20	<2500	<2500	<500	<500	<500	<500	<500	<1,000	<500	<500	<500	<500	<500	<500	8,900 D
	6/17/2009	547.27	42.89	516.94	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	0.94 J.B
	9/17/2009	547.27	44.76	515.62	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	12/17/2009	547.27	13.25	537.90	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	32
3/10/2010	547.27	4.50	544.09	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	1.5 J	
6/1/2010	547.27	7.43	542.02	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	
RW-6 (Recovery & sample)	8/26/2003	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	NA	NA	140,000
	9/9/2005	NG	NG	NG	5	NA	NA	NA	NA	NA	NA	NA	BRL	NA	NA	NA	NA	NA	3,300 D
	2/22/2007	NG	NG	NG	BRL	BRL	NA	BRL	BRL	BRL	NA	BRL	BRL	BRL	BRL	NA	NA	NA	BRL
	6/20/2007	547.89	12.71	535.18	<25	<25	<5.0	<5.0	<5.0	<5.0	NA	<15	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	NA
	9/20/2007	547.89	17.40	530.49	<25	<25	NA	<5.0	<5.0	<5.0	NA	<15	<5.0	<5.0	<5.0	NA	NA	NA	<5.0
	12/19/2007	547.89	1.62	544.71	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<15	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
	3/18/2008	547.89	4.58	543.81	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<15	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
	6/4/2008	547.89	36.86	514.96	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<15	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
	9/11/2008	547.89	37.58	514.41	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<15	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
	12/17/2008	547.89	38.38	512.80	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	3/23/2009	547.89	7.91	540.84	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	6/17/2009	547.89	33.77	517.90	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	9/17/2009	547.89	9.91	539.06	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
12/18/2009	547.89	11.76	537.41	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	
3/10/2010	547.89	4.41	543.97	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	
6/1/2010	547.89	6.70	541.92	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	

Notes:
 <1.0 - Not detected at or above the laboratory reporting limit shown.
 * - Sample results are from a pumping test.
 U - Units reported in µg/L - micrograms per liter (parts per billion)
 B - analyte found in the associated blank, as well as in the sample
Bolded - Detection above laboratory reporting limits
 BRL - Below laboratory reporting limits
 BTEX - benzene, toluene, ethylbenzene, and total xylenes.
 Corrected Water Table Elevation - Determined by trigonometry for wells MW-D9, MW-D11 to MW-D13, and RW-4 to RW-6
 D - Surrogate recovery unreportable due to dilution.
 DRY - Insufficient water to gauge or sample
 J - The reported concentration is estimated (the result is less than the sample quantitation limit but greater than zero)
 NA - not analyzed
 NG - not gauged/or data not available
 NS - not sampled
 NYSDDEC Standards and Guidance Values - New York State Department of Environmental Conservation Technical and Operational Guidance Series (TOGS) 1.1.1, Ambient Water Quality Standards and Guidance Values, June 1998 and Addendum April 2000
 Shading - Reported concentration detected above the applicable standard(s) or guidance value(s)

FIGURES



LATITUDE: 43° 05' 03" N
 LONGITUDE: 77° 37' 19" W



SITE LOCATION

NEWBURGH, NY

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REFERENCES:

1. AERIAL IMAGES "w_14041124_12_09000_col_20051.sid" AND "w_14041126_12_09000_col_20051.sid" © NYS CLEARING HOUSE.
2. KLEINFELDER FIELD RESEARCH.



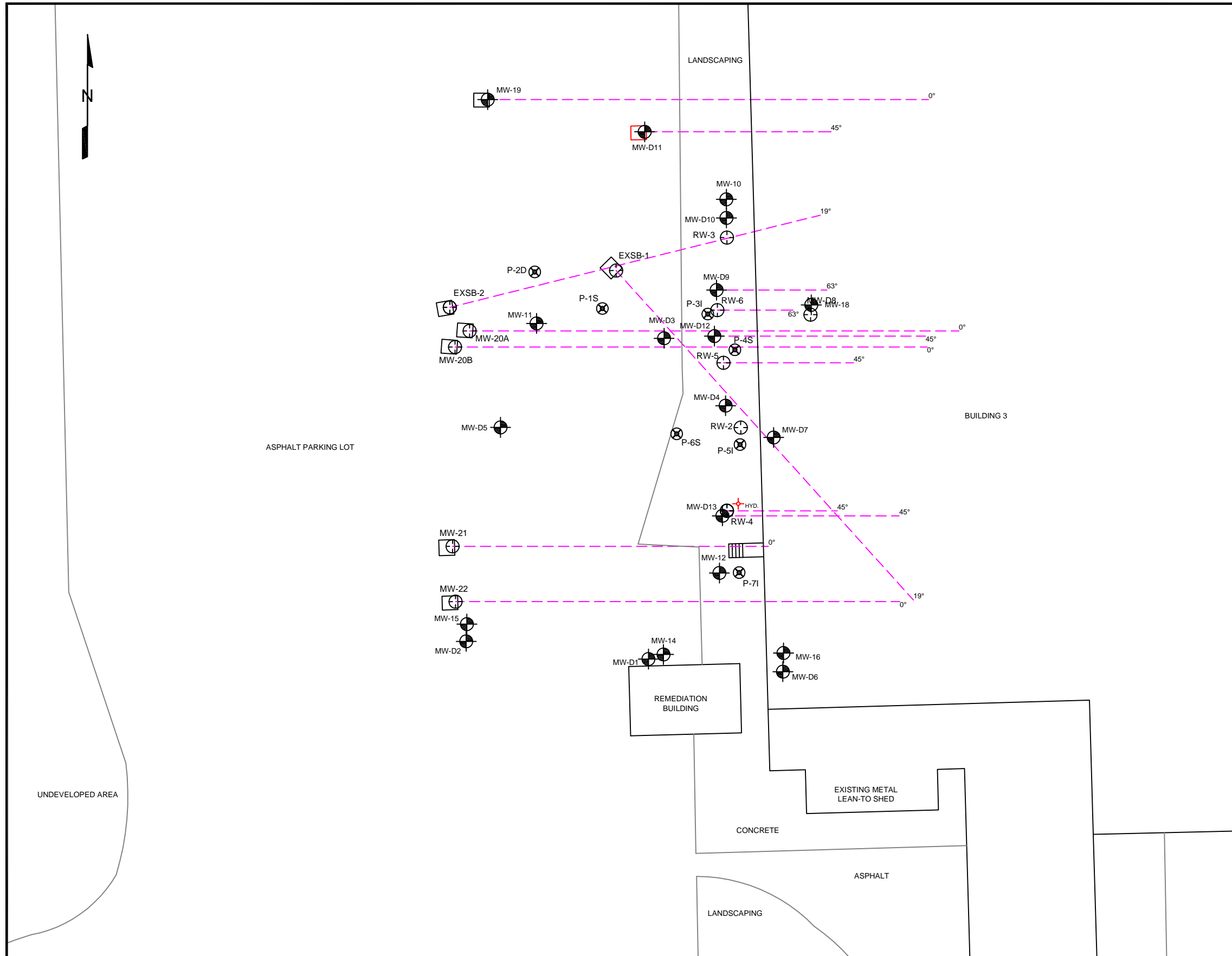
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DRAWN:	04/19/10
DRAWN BY:	CTH
CHECKED BY:	TS
FILE NAME:	SANOFISSURJAN10.dwg

AREA MAP

UCB FACILITY
 NYSDEC VCP# V00126-8
 755 JEFFERSON ROAD
 ROCHESTER
 MONROE COUNTY NEW YORK

FIGURE

1



LEGEND

- MONITORING WELL
- RECOVERY WELL
- PIEZOMETER
- VAULT
- FIRE HYDRANT
- ANGLED WELL (ANGLE MEASURED FROM GROUND SURFACE)



NEWBURGH, NY

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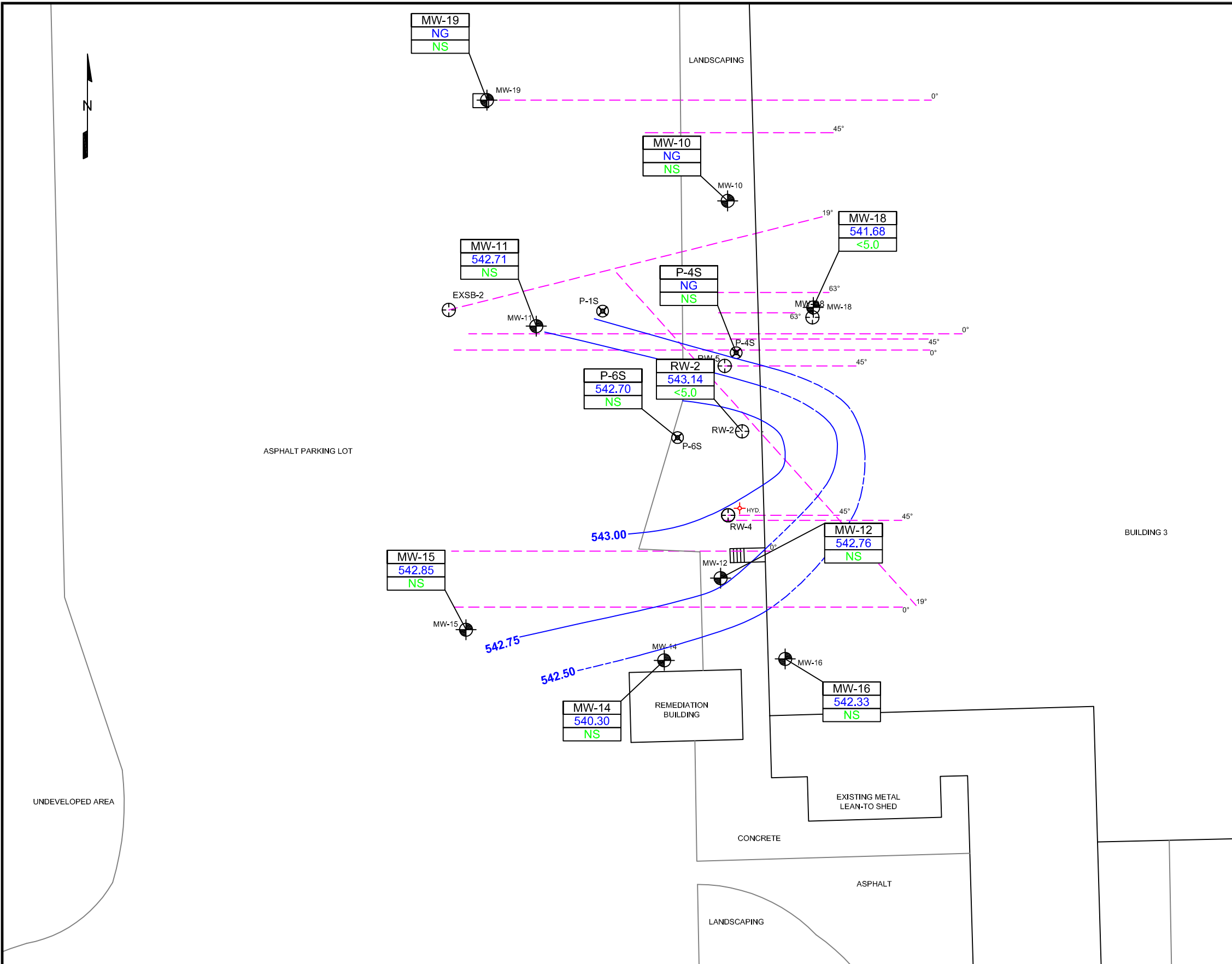
- REFERENCES:**
- "WELL LOCATION MAP" PREPARED BY ERM, DATED SEPTEMBER, 2006.
 - KLEINFELDER FIELD RESEARCH.

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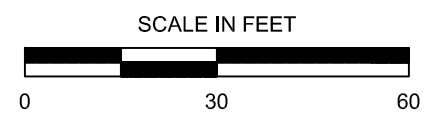
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DRAWN BY:	KAW
CHECKED BY:	TS
FILE NAME:	

SITE PLAN
UCB FACILITY NYSDEC VCP# V00126-8 755 JEFFERSON ROAD

FIGURE
2



LEGEND	
	MONITORING WELL
	RECOVERY WELL
	PIEZOMETER
	FIRE HYDRANT
	ANGLED WELL (ANGLE MEASURED FROM GROUND SURFACE)
	MONITORING WELL IDENTIFICATION GROUNDWATER ELEVATION (FEET) METHYLENE CHLORIDE (µg/L)
	WATER-TABLE CONTOUR (0.5 FOOT INTERVAL) (DASHED WHERE INFERRED)
µg/L	MICROGRAMS PER LITER
NG	NOT GAUGED
NS	NOT SAMPLED



NOTES:
 1. GROUNDWATER MONITORING WELLS WERE GAUGED AND SAMPLED ON JUNE 1, 2010.
 2. SYSTEM WAS NOT OPERATIONAL AT THE TIME OF GAUGING AND SAMPLING.

REFERENCES:
 1. "WELL LOCATION MAP" PREPARED BY ERM, DATED SEPTEMBER, 2006.
 2. KLEINFELDER FIELD RESEARCH.

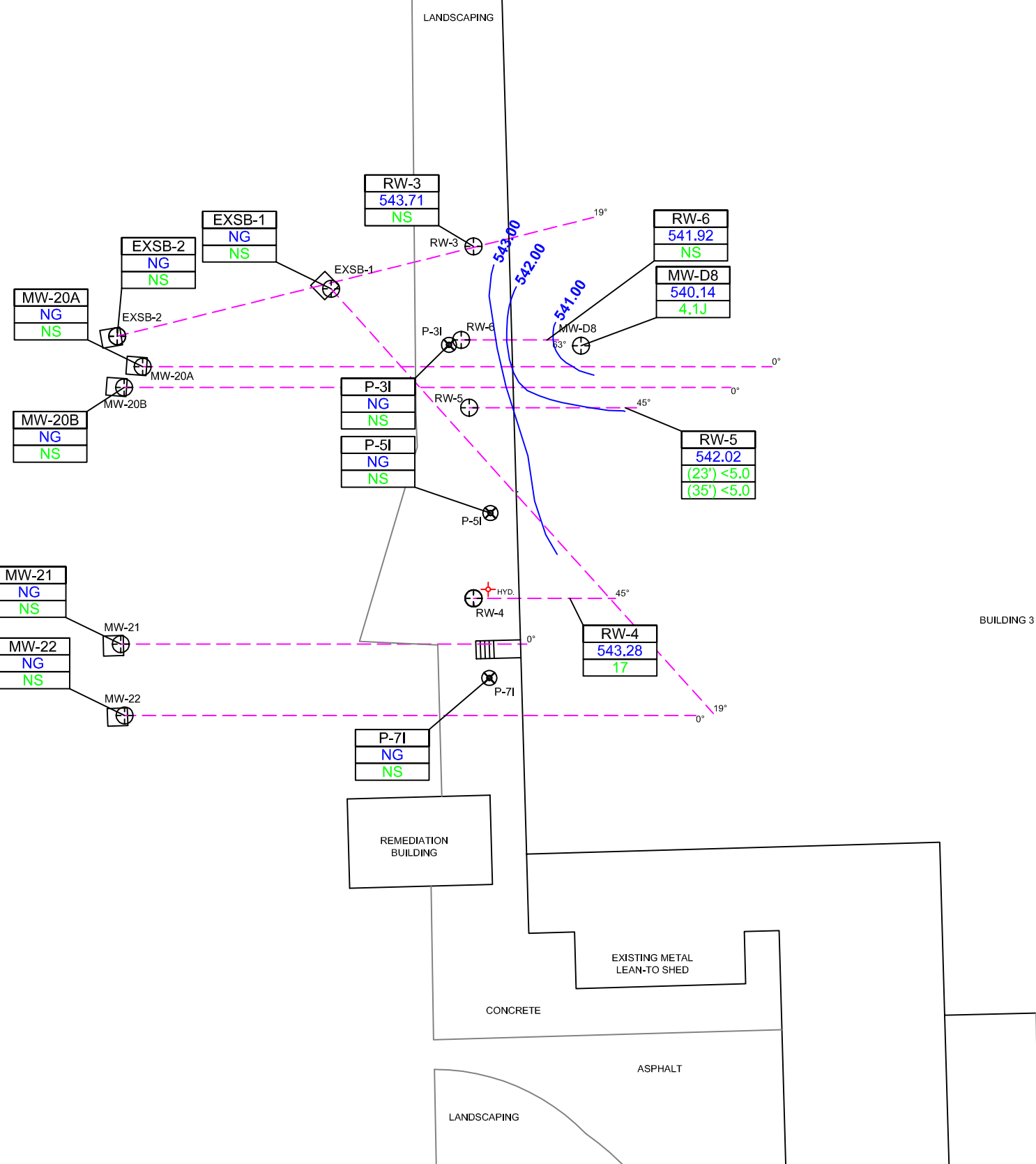


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DRAWN BY:	JDS
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FILE NAME:	





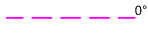
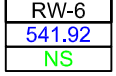




GROUNDWATER CONTOUR AND CONCENTRATION MAP SHALLOW WELLS	FIGURE 3

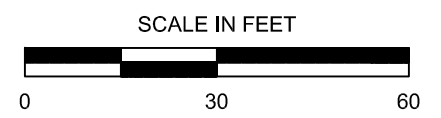
NEWBURGH, NY

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LEGEND

-  RECOVERY WELL
-  PIEZOMETER
-  VAULT
-  FIRE HYDRANT
-  ANGLD WELL (ANGLE MEASURED FROM GROUND SURFACE)
-  MONITORING WELL IDENTIFICATION
GROUNDWATER ELEVATION (FEET)
METHYLENE CHLORIDE (µg/L)
-  WATER-TABLE CONTOUR (1 FEET INTERVAL)
(DASHED WHERE INFERRED)
-  µg/L
-  NG NOT GAUGED
-  NS NOT SAMPLED



- NOTES:**
- GROUNDWATER MONITORING WELLS WERE GAUGED AND SAMPLED ON JUNE 1, 2010.
 - SYSTEM WAS NOT OPERATIONAL AT THE TIME OF GAUGING AND SAMPLING.
- REFERENCES:**
- "WELL LOCATION MAP" PREPARED BY ERM, DATED SEPTEMBER, 2006.
 - KLEINFELDER FIELD RESEARCH.



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DRAWN:	06/16/10
DRAWN BY:	JDS
CHECKED BY:	TS
FILE NAME:	SANOFISSURJUNE10.dwg

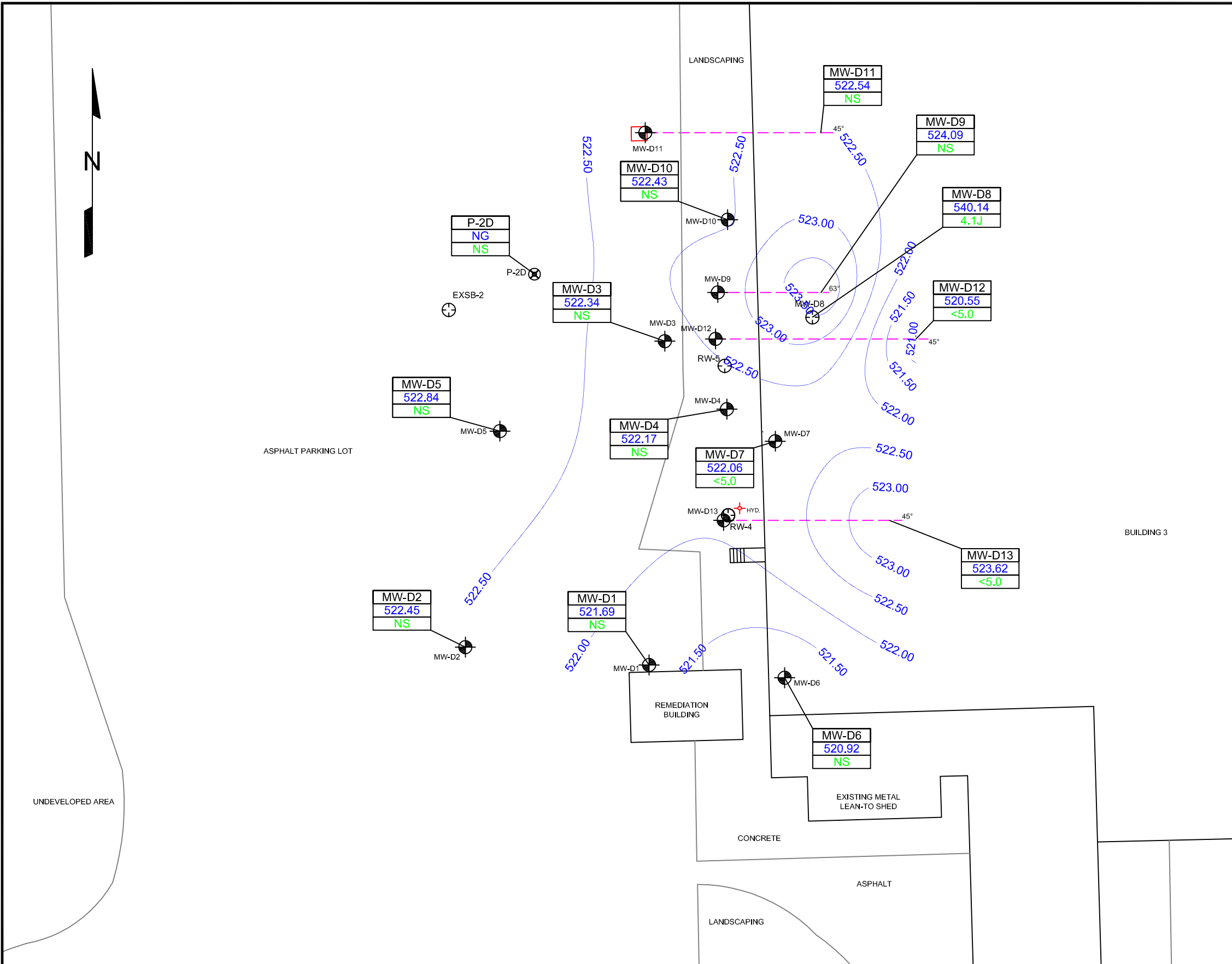
GROUNDWATER CONTOUR AND CONCENTRATION MAP INTERMEDIATE WELLS

UCB FACILITY
NYSDEC VCP# V00126-8
755 JEFFERSON ROAD

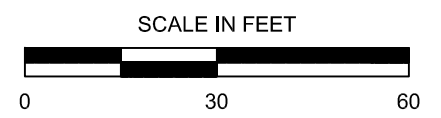
FIGURE
4

NEWBURGH, NY

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LEGEND	
	MONITORING WELL
	RECOVERY WELL
	PIEZOMETER
	FIRE HYDRANT
	ANGLED WELL (ANGLE MEASURED FROM GROUND SURFACE)
	MONITORING WELL IDENTIFICATION GROUNDWATER ELEVATION (FEET) METHYLENE CHLORIDE (µg/L)
	WATER-TABLE CONTOUR (0.5 FOOT INTERVAL) (DASHED WHERE INFERRED)
µg/L	MICROGRAMS PER LITER
NG	NOT GAUGED
NS	NOT SAMPLED



NOTES:
 1. GROUNDWATER MONITORING WELLS WERE GAUGED AND SAMPLED ON JUNE 1, 2010.
 2. SYSTEM WAS NOT OPERATIONAL AT THE TIME OF GAUGING AND SAMPLING.

REFERENCES:
 1. "WELL LOCATION MAP" PREPARED BY ERM, DATED SEPTEMBER, 2006.
 2. KLEINFELDER FIELD RESEARCH.



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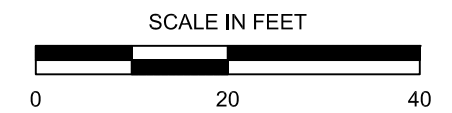
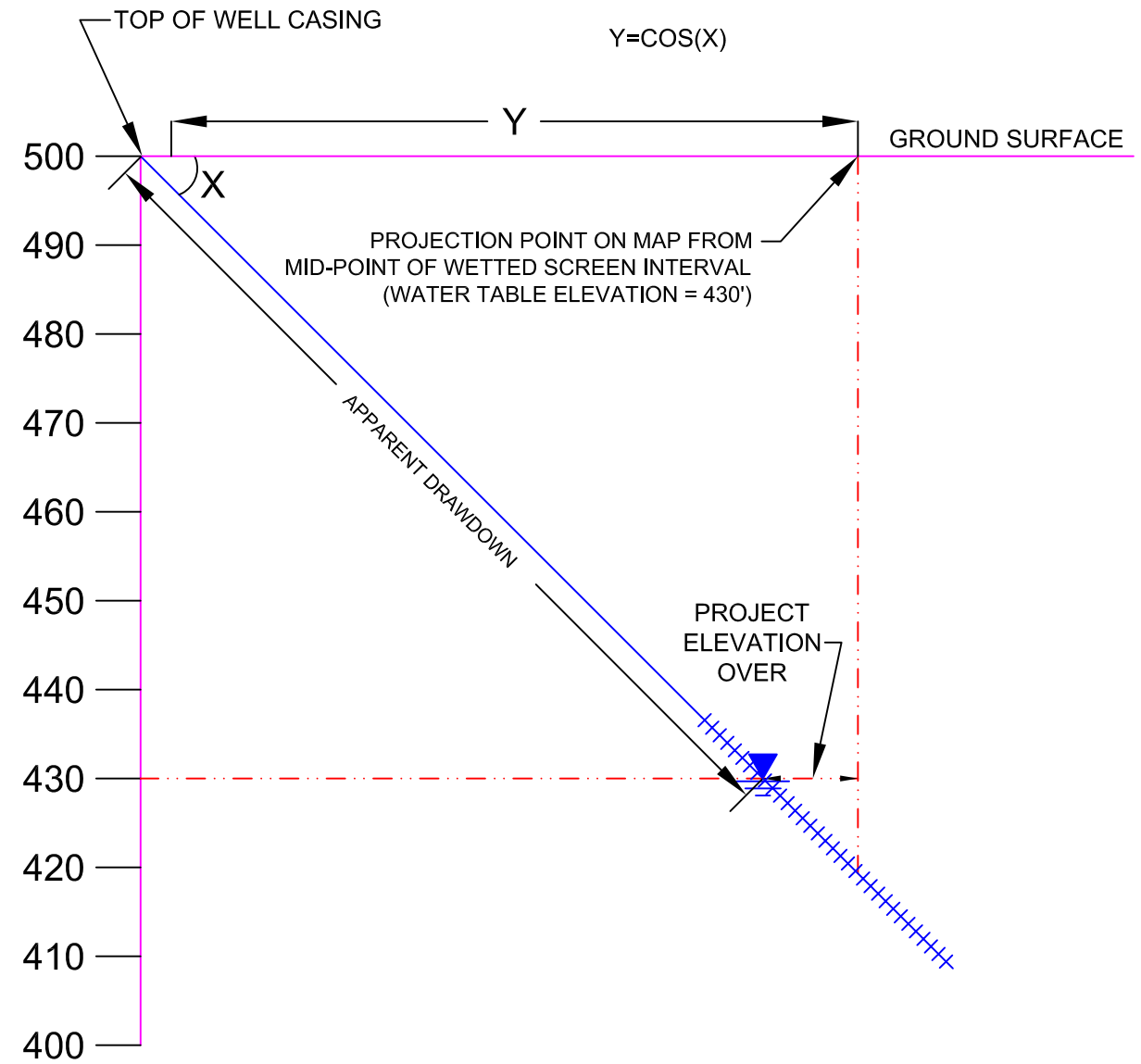
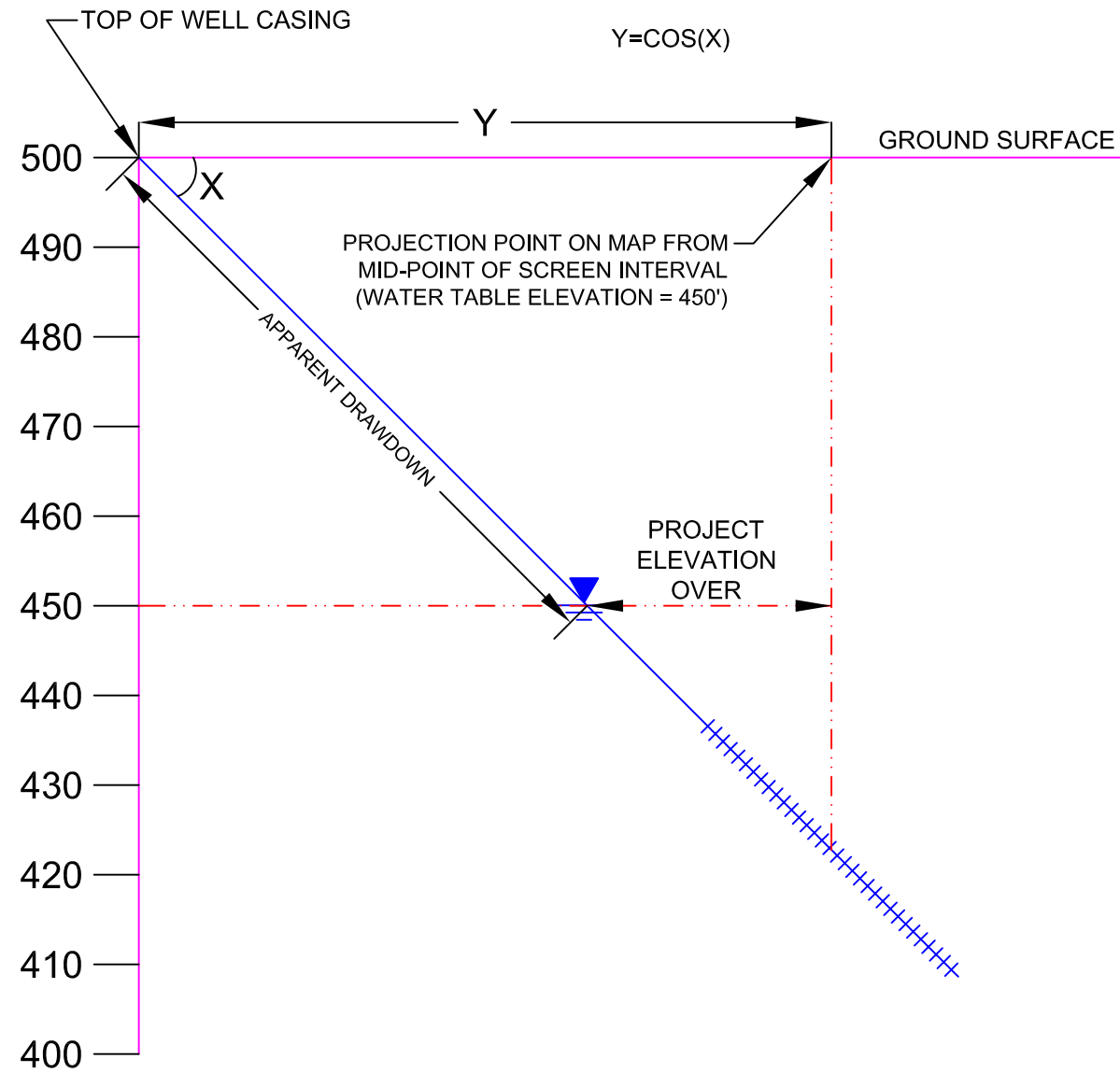
GROUNDWATER CONTOUR AND CONCENTRATION MAP DEEP WELLS

UCB FACILITY
 NYSDEC VCP# V00126-8
 755 JEFFERSON ROAD

FIGURE
5

NEWBURGH, NY

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REFERENCES:

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2. KLEINFELDER FIELD RESEARCH.



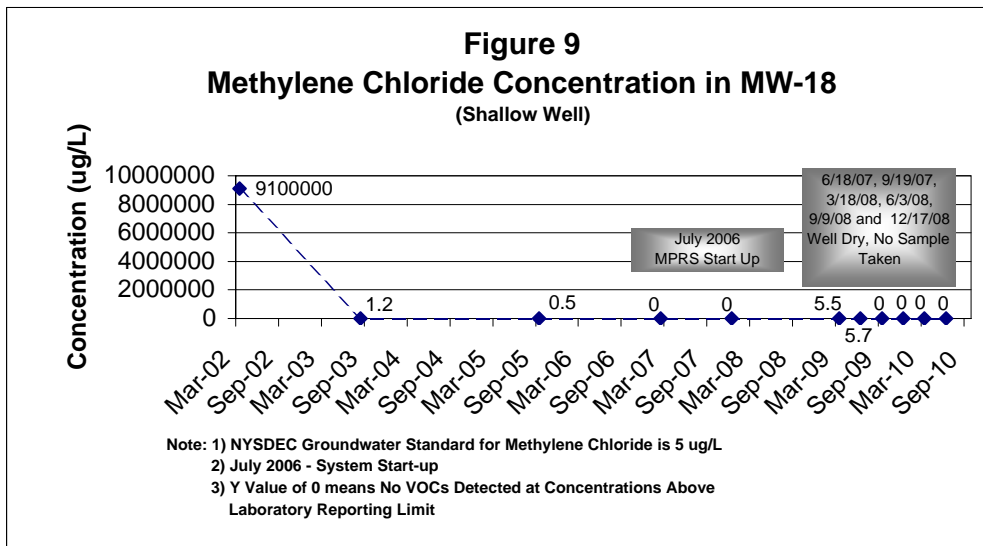
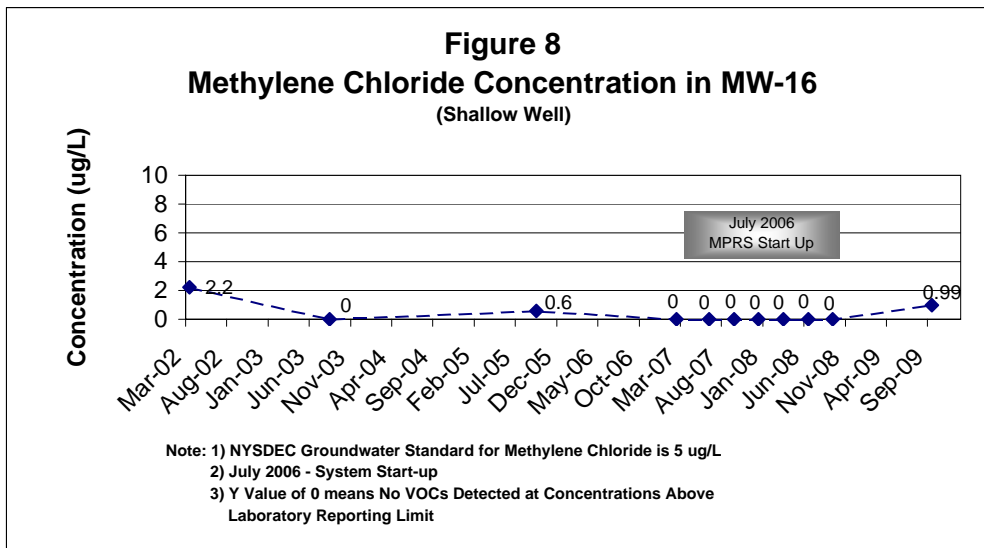
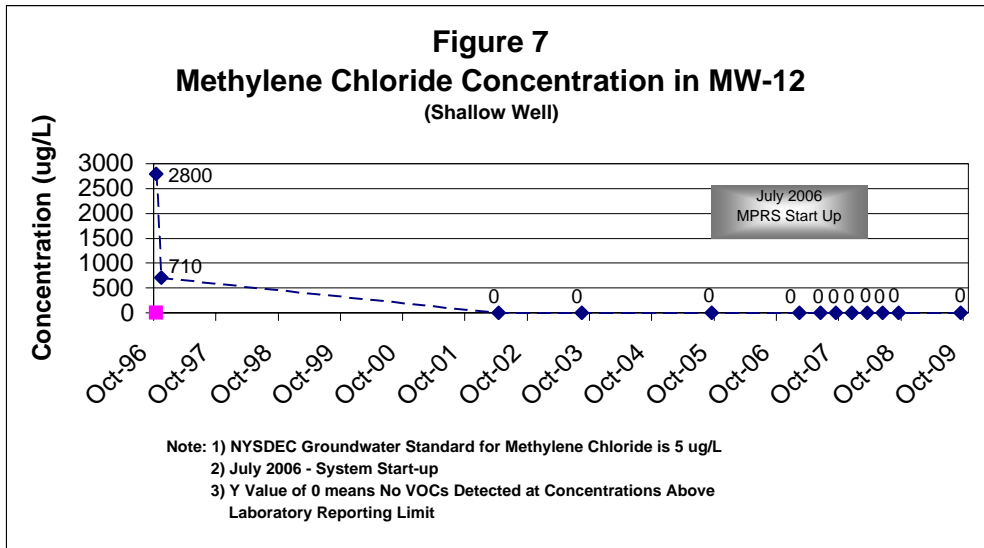
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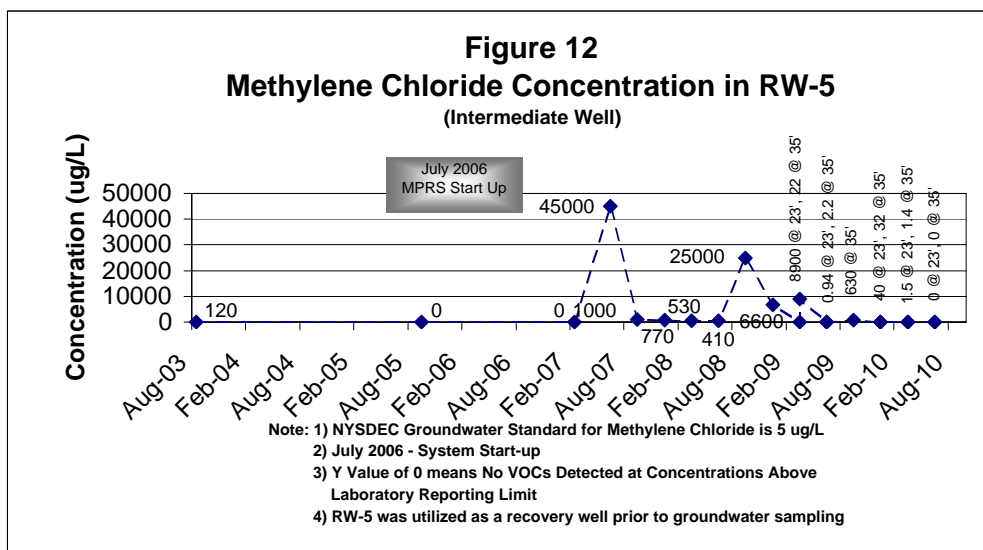
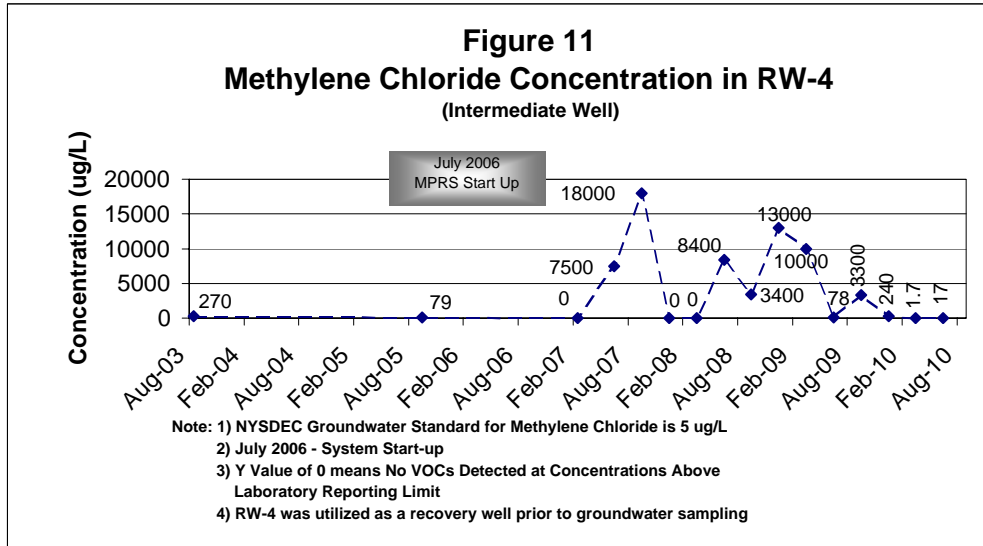
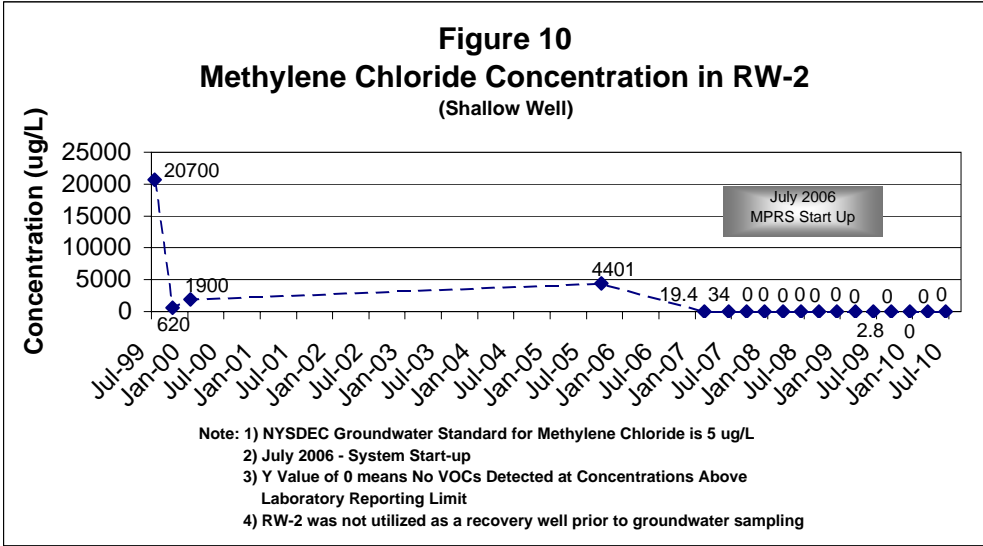
**DIAGONAL WELL
POTENTIOMETRIC CONVERSION**

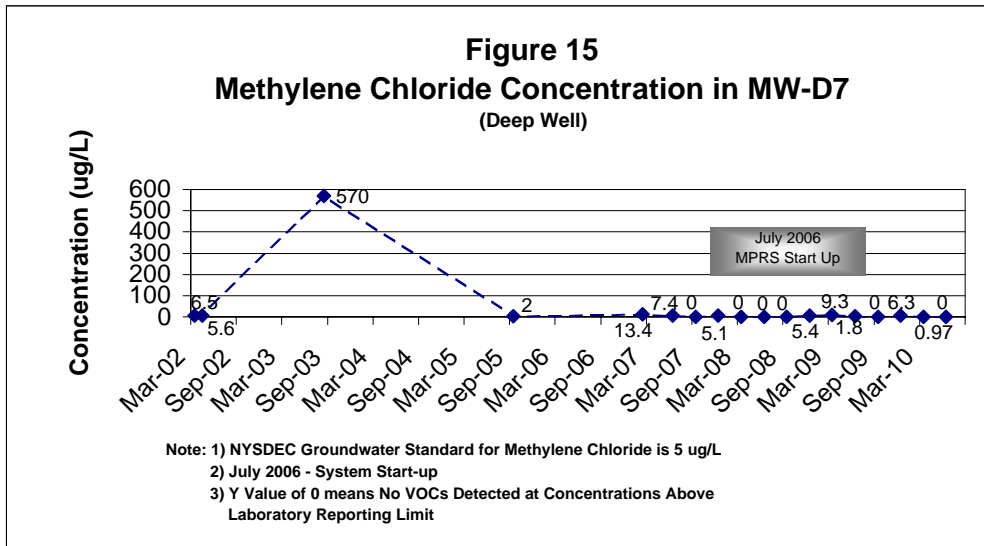
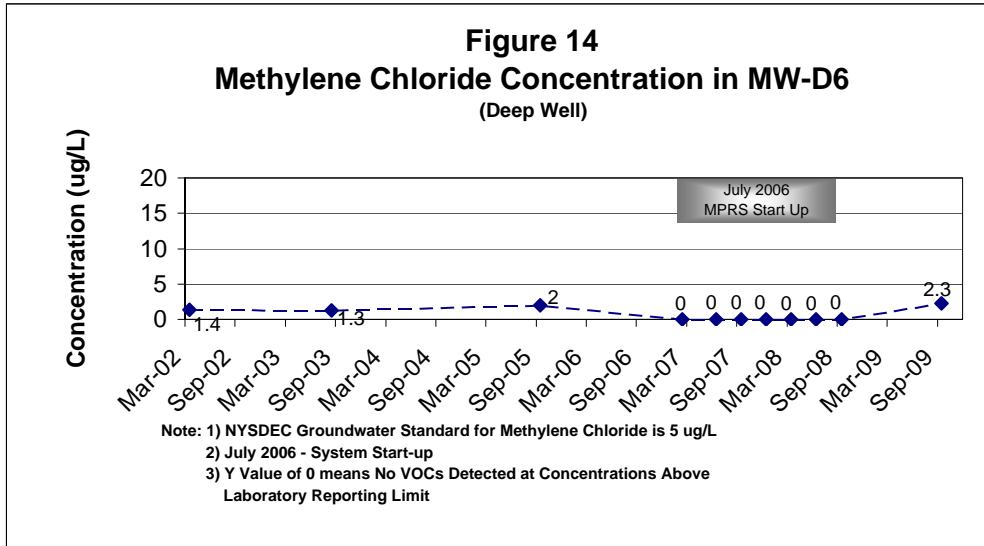
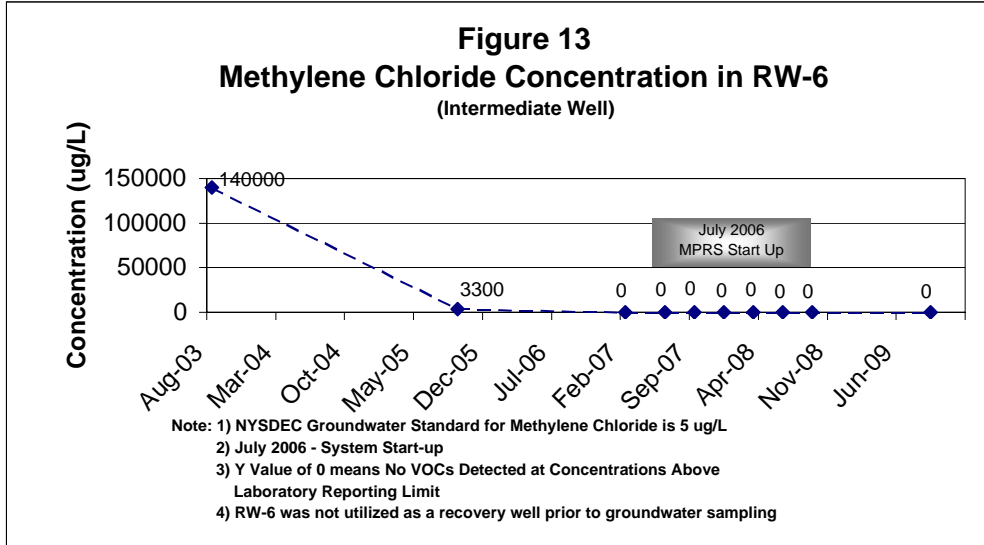
UCB FACILITY
 NYSDEC VCP# V00126-8
 755 JEFFERSON ROAD
 ROCHESTER
 MONROE COUNTY NEW YORK

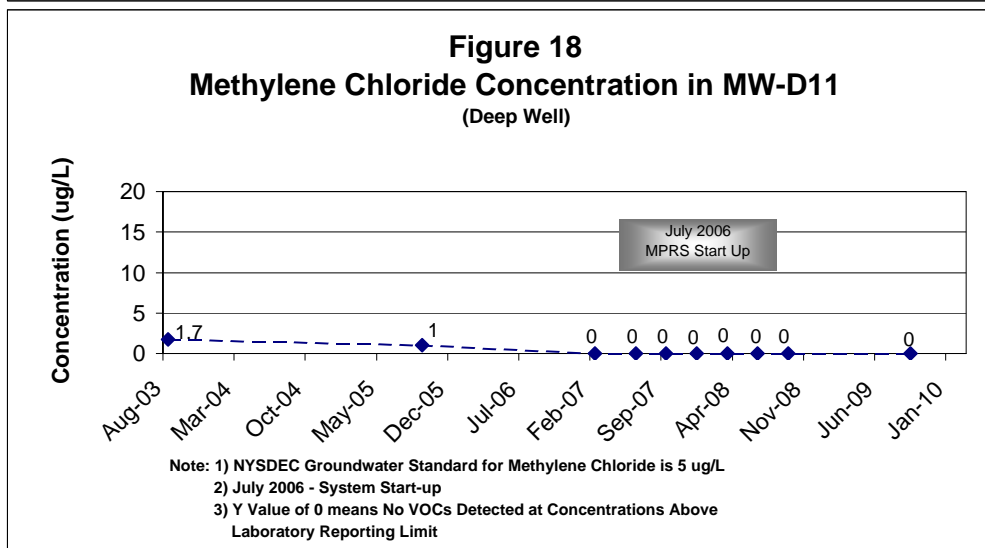
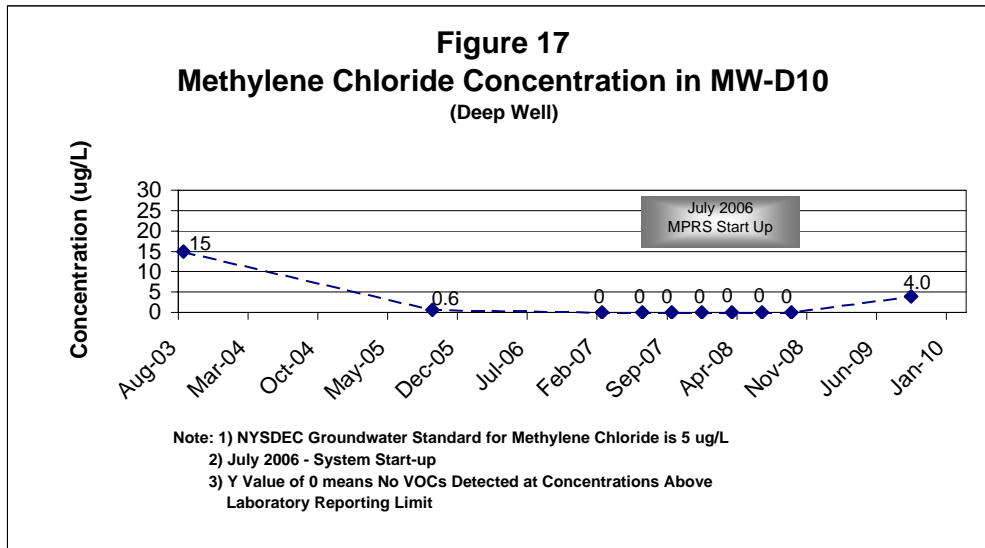
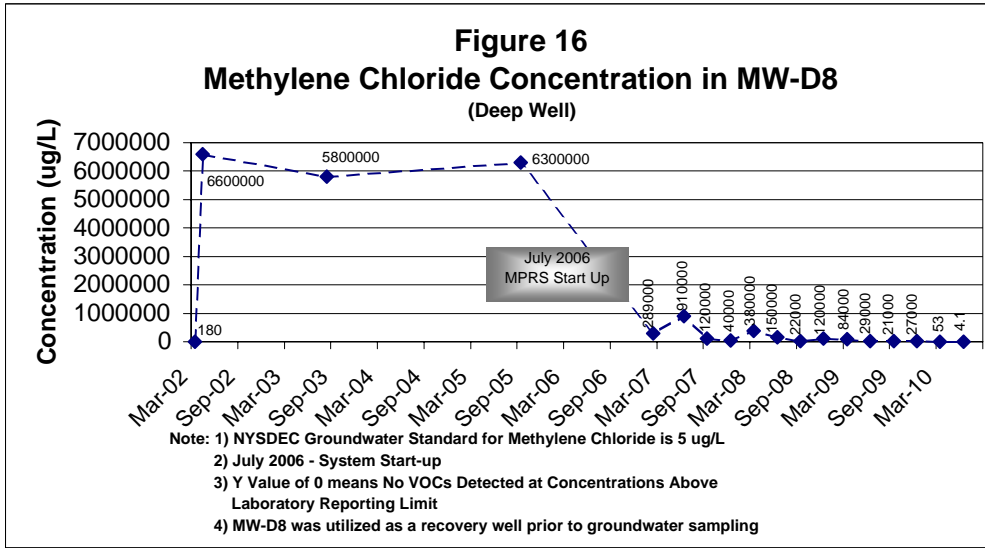
FIGURE

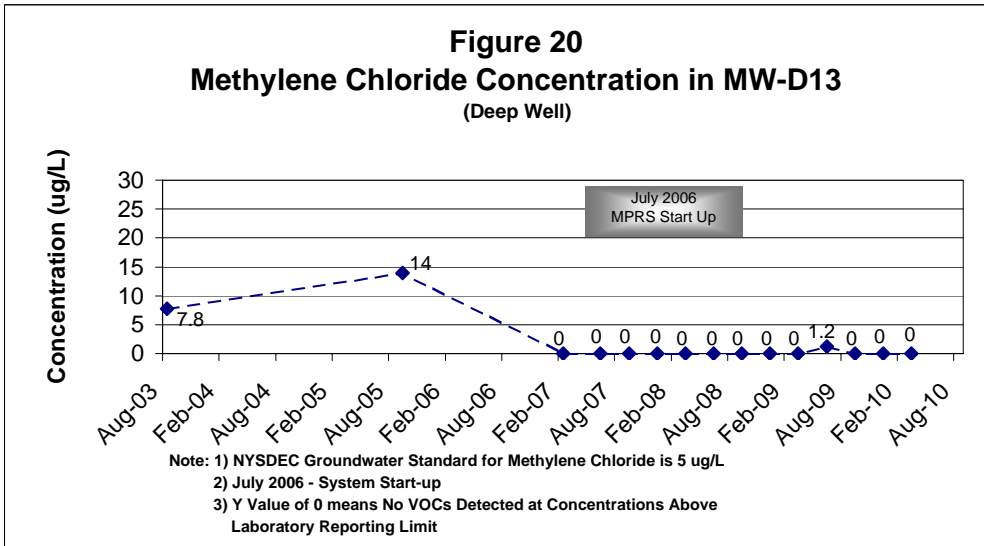
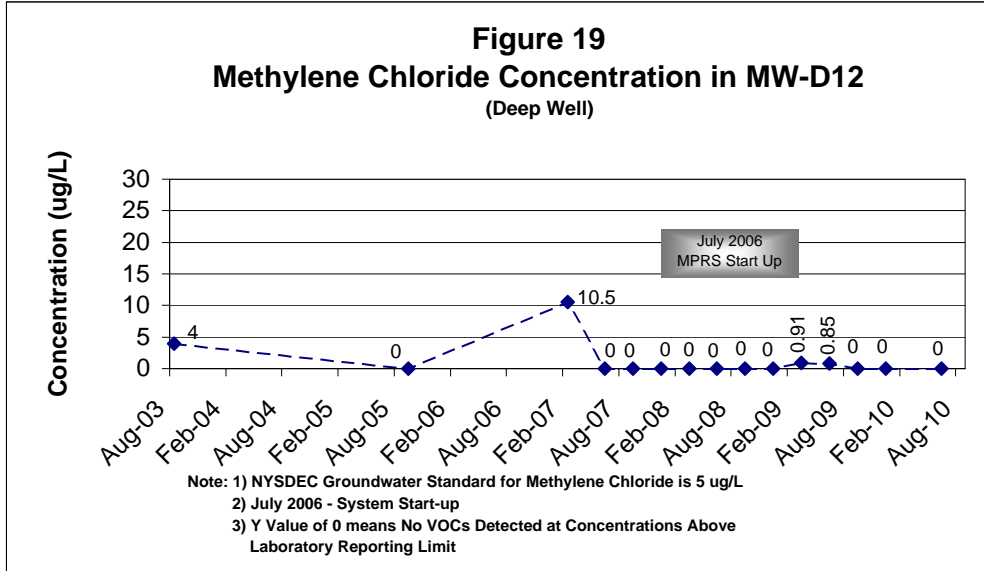
6











Appendix A
Monthly Progress Reports – April, May, and June 2010



May 10, 2010

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: Monthly Progress Report –April 2010
755 Jefferson Road Facility – Henrietta, New York
NYSDEC VCP Number V00126-8

***Key Actions
This Period:***

- **April 1 – April 30, 2010.** The system was intermittently operational in accordance with the NYSDEC approved pulsing plan.

Operations Metrics (April 6 – May 3)

- Operational Time: 170 out of a scheduled 170 hours of operation.
- Uptime Efficiency: 100%
- Volume of Groundwater Treated: 3,824 gallons.
 - Discharged to: The sanitary sewer system.
- Total estimated VOC mass recovered to date: 138.7 lbs.
- Total estimated VOC mass recovered during April: 0.18 lbs.
- Mean estimated VOC mass removal rate for April 2010 versus March 2010: 0.0011 versus 0.0007 lbs/hr.
- General weather conditions: Average precipitation and average temperatures as compared to historical data.

Tables, Figures and Graphs

- Table 1: April Treated Waste Water Flow/Vapor Monitoring Data.
- Table 2: April Recovery Well Rotation Data.
- Figures 1-9: Remedial Effectiveness and Efficiency Platform (REEP) graphs
- Figures 2A and 3A: Selected Remedial Effectiveness and Efficiency Platform (REEP) graphs showing results from April 2009 to present.

***Problems/
Resolutions:***

- None

***Analytical Data
Received:***

- The April 2010 MPRS liquid influent analytical data.
- The April 2010 MPRS vapor influent analytical data.

***Documents
Submitted:***

- Monthly Progress Report for March 2010 dated April 9, 2010.
- Draft revised Site Management Plan (April 2010).
- Draft MCA OM&M FER (April 2010).

- Draft Site-Wide Petition for Remedial Closeout (April 2010).

**Anticipated
Actions –
May
2010:**

- Continue NYSDEC approved pulsing program until permission is granted to terminate system operation.
- Meeting with NYSDEC to discuss recently submitted reports and steps to achieve closure.

Comments:

- The attached REEP information is to be utilized as a subjective representation of the overall effectiveness/performance of the system as we are using discontinuous data and PID measurements for the removal calculations. We do not intend this tool as a definitive summary of recovered mass.
- MPRS operation and efficiency, inclusive of the replacement LRP pump and associated upgrades and maintenance, will continue to be monitored.
- Submittal of the Draft MCA OM&M FER, Site Wide Petition for Remedial Closeout and revised Site Management Plan has been completed. Submittal of the final MCA OM&M FER, Site Wide Petition for Remedial Closeout and revised Site Management Plan is tentatively scheduled for late May or early June, if final comments from the NYSDEC are received by the end of May.

**NYSDEC-
Approved Field
Decisions:**

- Continuation of pulsing of MPRS system in accordance with the procedure presented to NYSDEC. Based upon discussions with NYSDEC, it is anticipated that the system will be pulsed during the month of May and then, if approval by the Department is given, shut down permanently.

If you have any questions regarding this monthly report or progress on the project, please don't hesitate to contact me at 513-314-7543 or rbethel@qmg-inc.com.

Sincerely,
QUANTUM MANAGEMENT GROUP, INC.



Rick Bethel
Senior Associate

Attachments

cc:

Mr. Jeffrey M. Kosmala, P.E. (MCDOH)
Mr. Michael Bogdan (Sanofi-Aventis)
Mr. Richard Ricci (Lowenstein Sandler PC)
Mr. Mark Byrne, P.E. (Town of Henrietta)
Ms. Libby Ford, (Nixon Peabody)
Mr. Greg Light (UCB)
Mr. George Hollerbach, P.E. (Quantum)

Ms. Melissa Menetti (NYSDOH)
Mr. David Panipinto (UCB)
Mr. Bart Putzig, P.E. (NYSDEC)
Mr. Sean Keenan (MCDES)
Mr. John Lang, P.E. (Quantum)

**TABLE 1 - TREATED WASTE WATER FLOW/VAPOR MONITORING DATA
MCA REMEDIATION SYSTEM
755 JEFFERSON ROAD, HENRIETTA, NEW YORK
NYSDEC VCP NUMBER V00126-8
April 2010**

Date	Time¹	Cumulative Hours²	Total Flow³ Gallons	Flow Rate⁴ Gal/Min	Cumulative Gallons^{5,6}	Influent PID (ppm)	Effluent PID (ppm)
3/29/2010	11:22	40100.6	170	1.4	331,018	0.1	0.0
4/26/2010	9:48	40100.8	37	2.3	331,055	1.5	0.4
4/26/2010	11:42	40102.7	196	1.7	331,251	0.8	0.0
4/28/2010	9:44	40148.8	1,557	0.6	332,808	1.7	0.0
4/28/2010	11:43	40150.7	184	1.6	332,992	0.4	0.0
4/30/2010	9:15	40196.3	646	0.2	333,638	1.5	0.2
4/30/2010	11:18	40198.3	181	1.5	333,819	0.2	0.0
5/3/2010	9:40	40268.7	838	0.2	334,657	0.5	0.0
5/3/2010	11:17	40270.3	185	2.0	334,842	0.2	0.0

¹Time of day (in military time) data was collected.

²Cumulative Hours represents the number of run-hours since MCA remediation system start-up on 12 July 2006.

³Total Flow in Gallons represents the flow that occurred since the time the last measurement was collected, as indicated in the previous row of the table.

⁴Flow Rate in Gallons/Minute represents the average flow rate since the time the last measurement was collected, as indicated in the previous row of the

⁵Cumulative Gallons represents the number of gallons of water treated by the MCA remediation system since start-up on 12 July 2006.

⁶Totalizer Flow readings collected from newly installed totalizer beginning October 2, 2007.

TABLE 2 - RECOVERY WELL ROTATION DATA
MCA REMEDIATION SYSTEM
755 JEFFERSON ROAD, HENRIETTA, NEW YORK
NYSDEC VCP NUMBER V00126-8
April 2010

Date	Well Rotation Clusters								
	EXSB-2	MW-D8	MW -21	MW-22	MW-20A	MW-20B	RW-6	RW-5	RW-4
April 1-25	System shut down as part of NYSDEC approved pulsing program								
April 26-May 3		X						X	X

Figure 1
MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
April 2010

Total VOC Mass Removed (Vapor and Ground Water Combined)

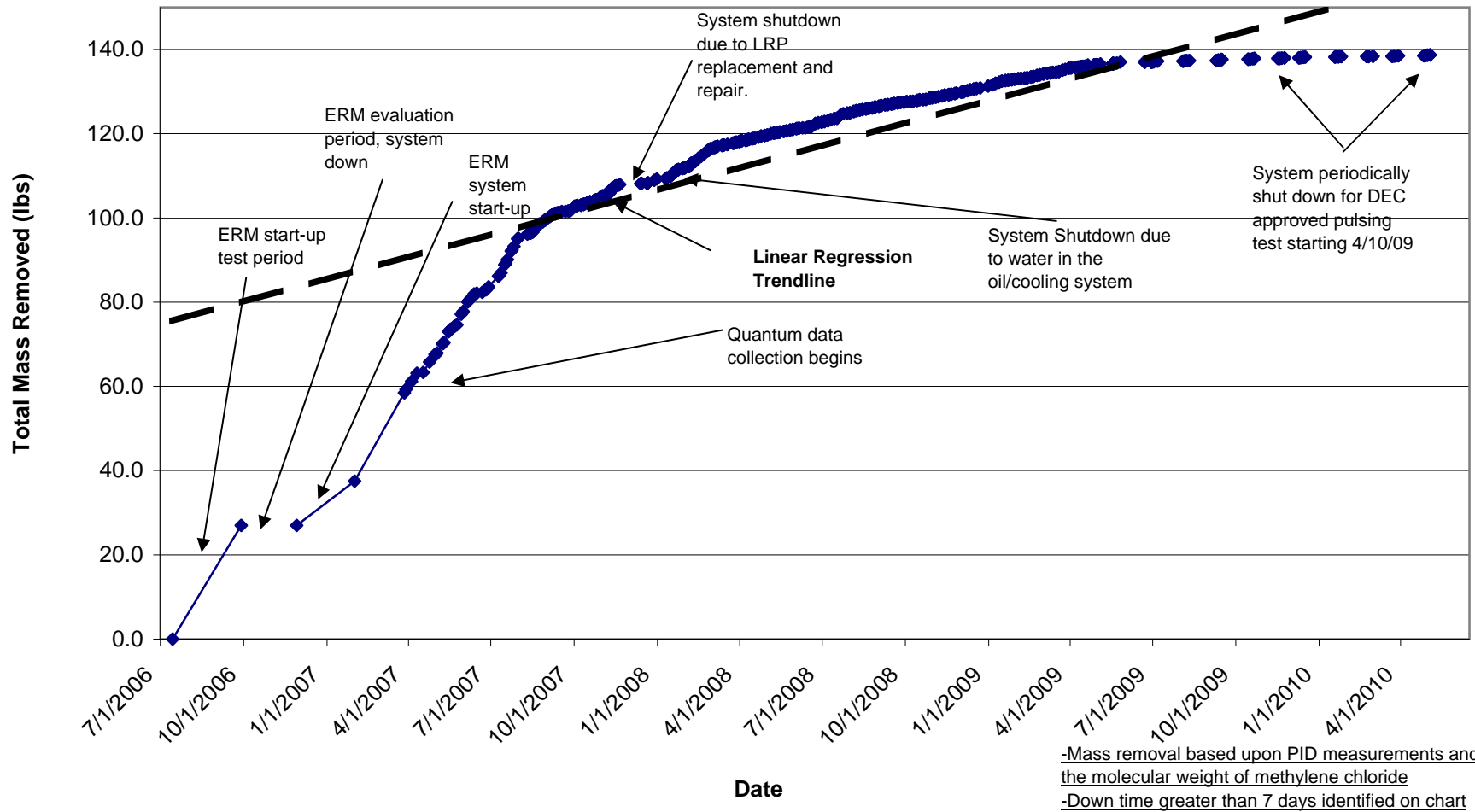


Figure 2
MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
April 2010

Total VOC Mass Removal Rate (Vapor & Ground Water Combined)

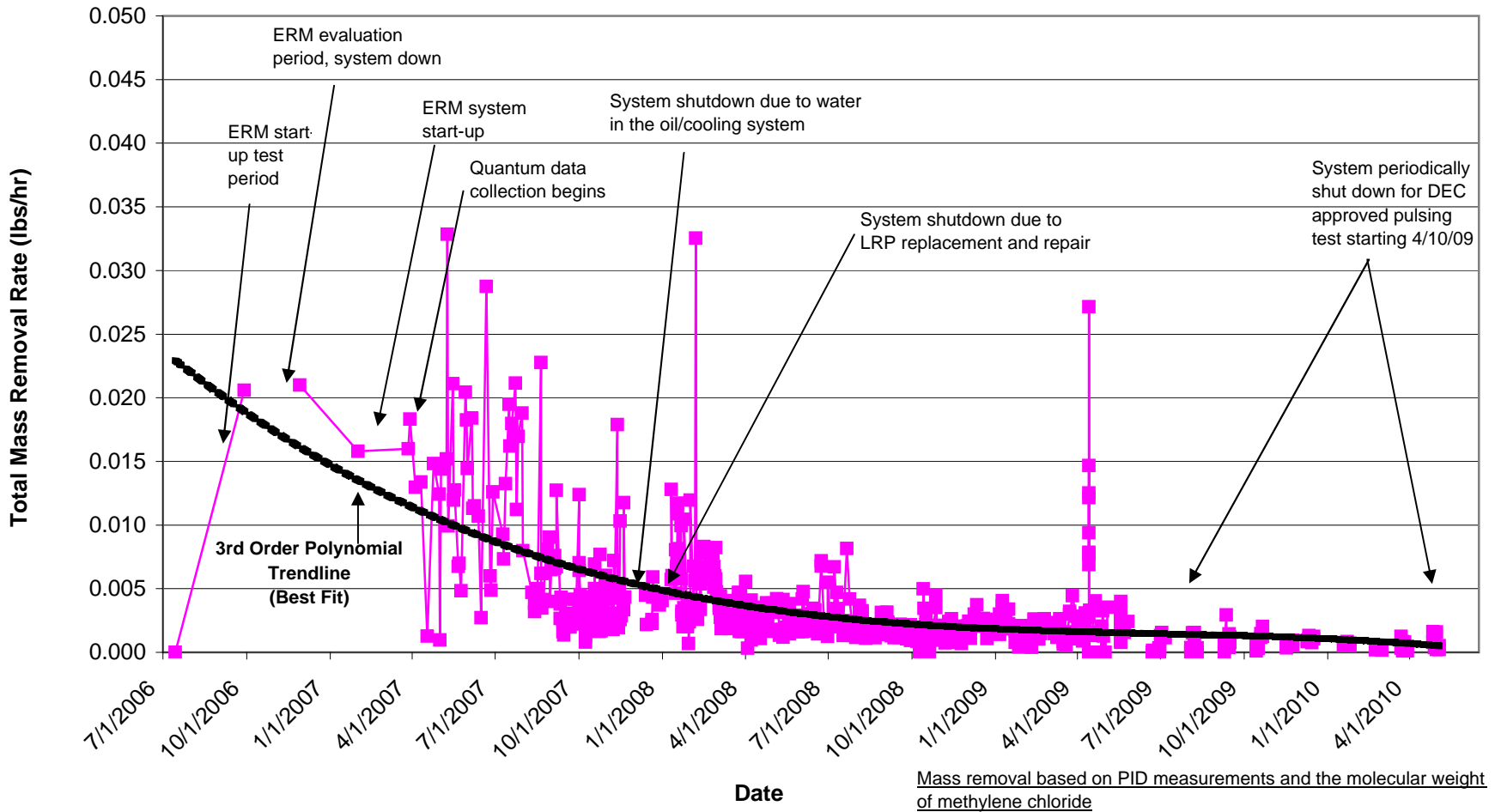
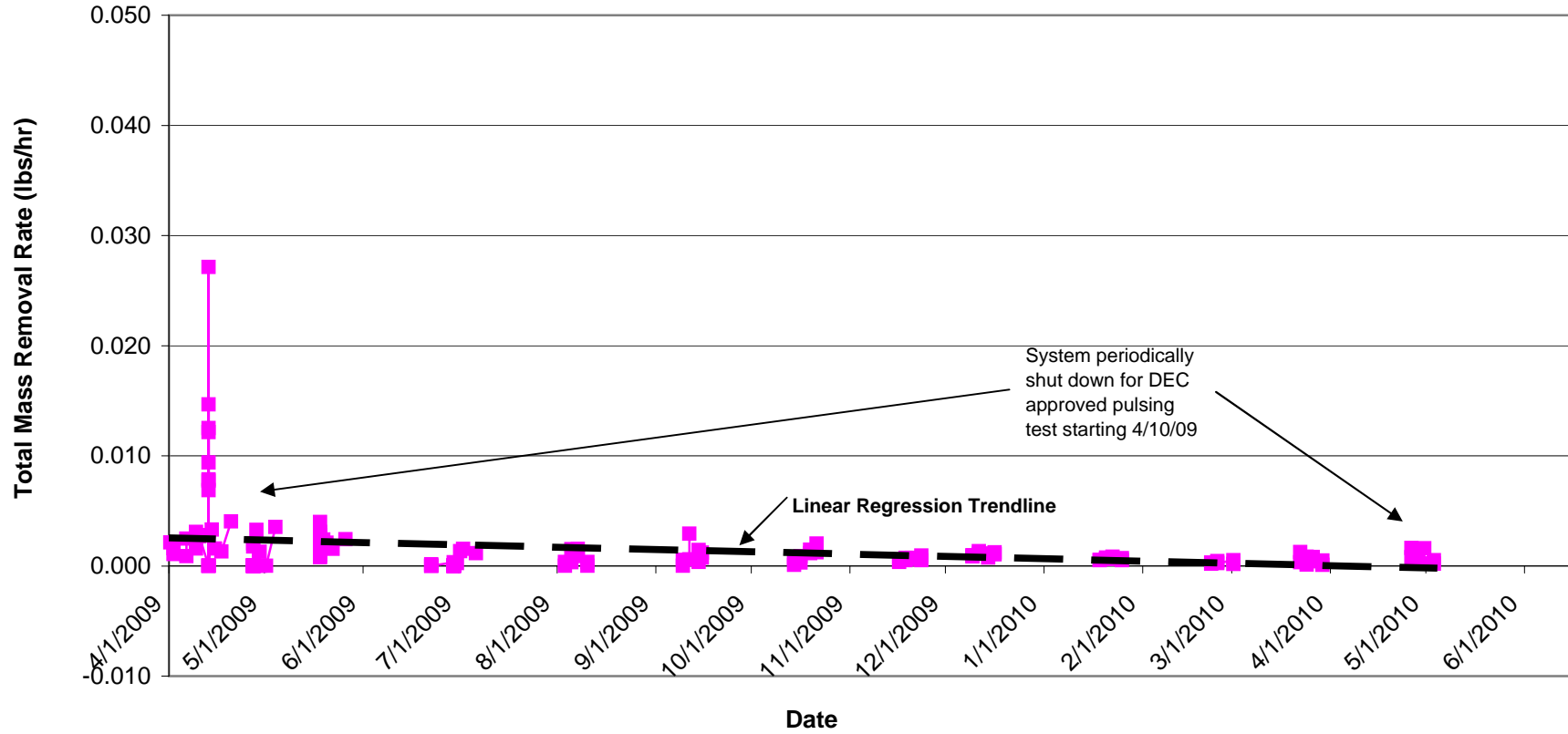


Figure 2A

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
April 2010

Total VOC Mass Removal Rate (Vapor & Ground Water Combined) Since April 2009



Mass removal based upon PID measurements and the molecular weight of methylene chloride

Figure 3

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
April 2010

Vapor Mass Removal Rate

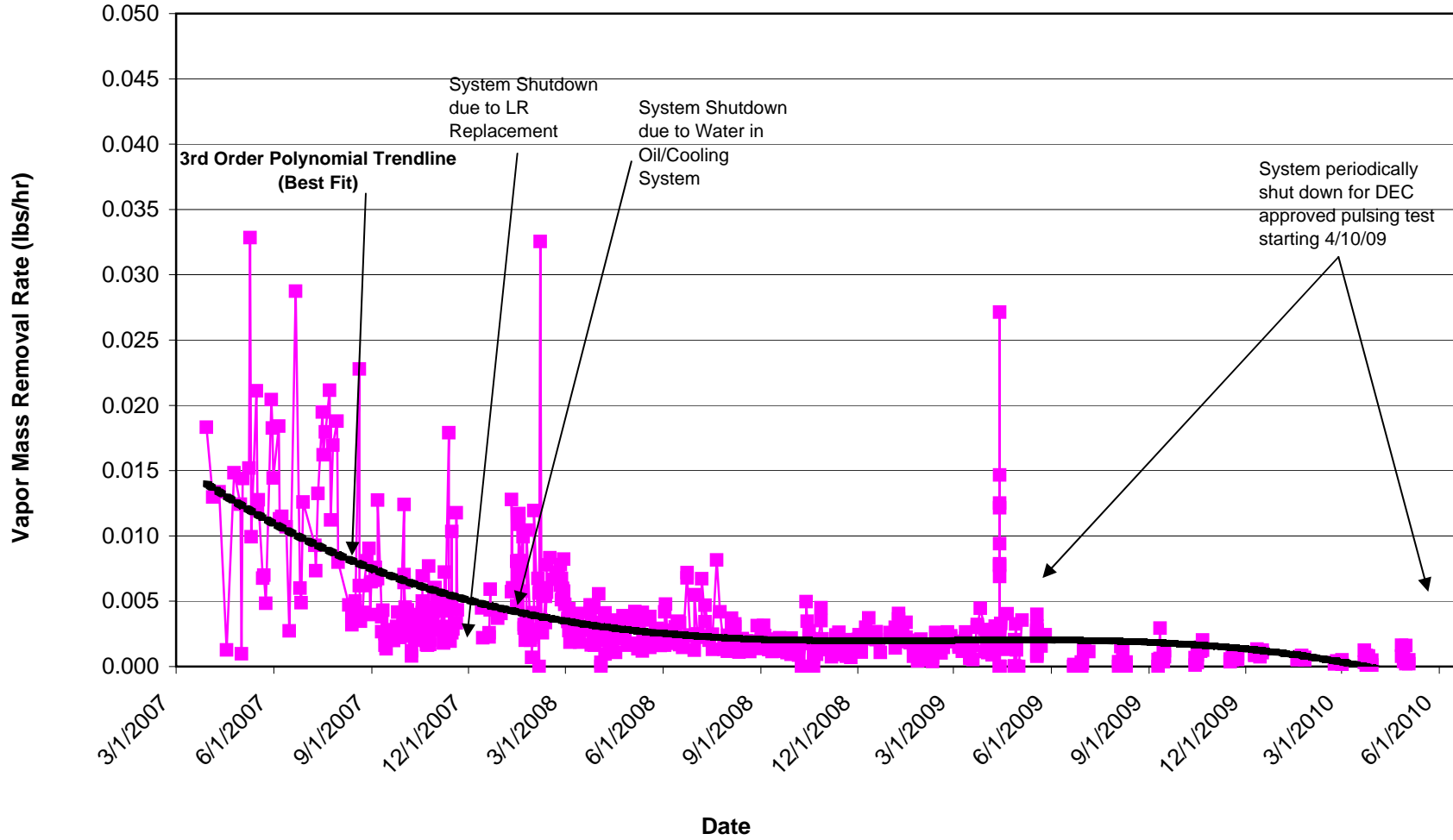


Figure 3A

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
April 2010

Vapor Mass Removal Rate Since April 2009

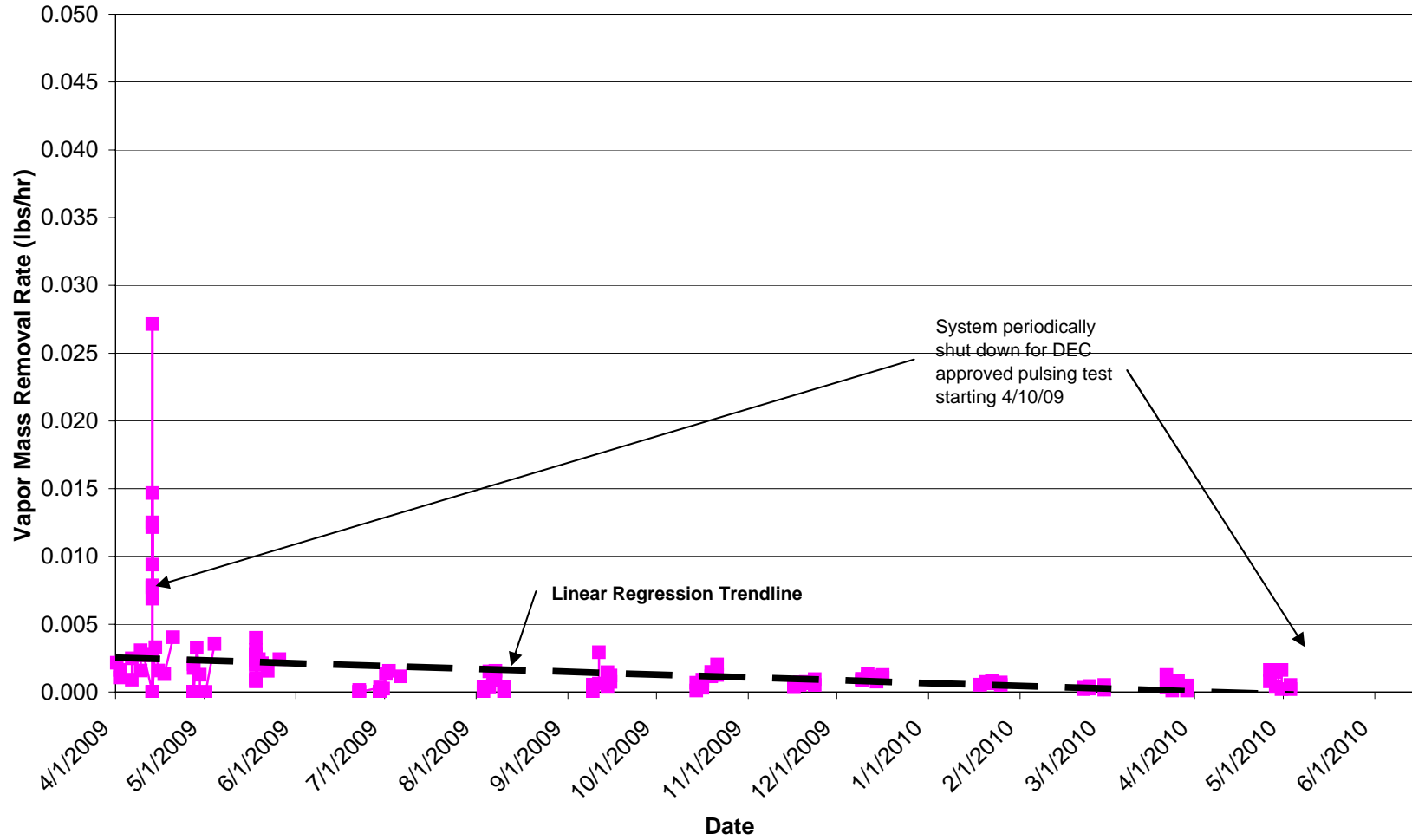
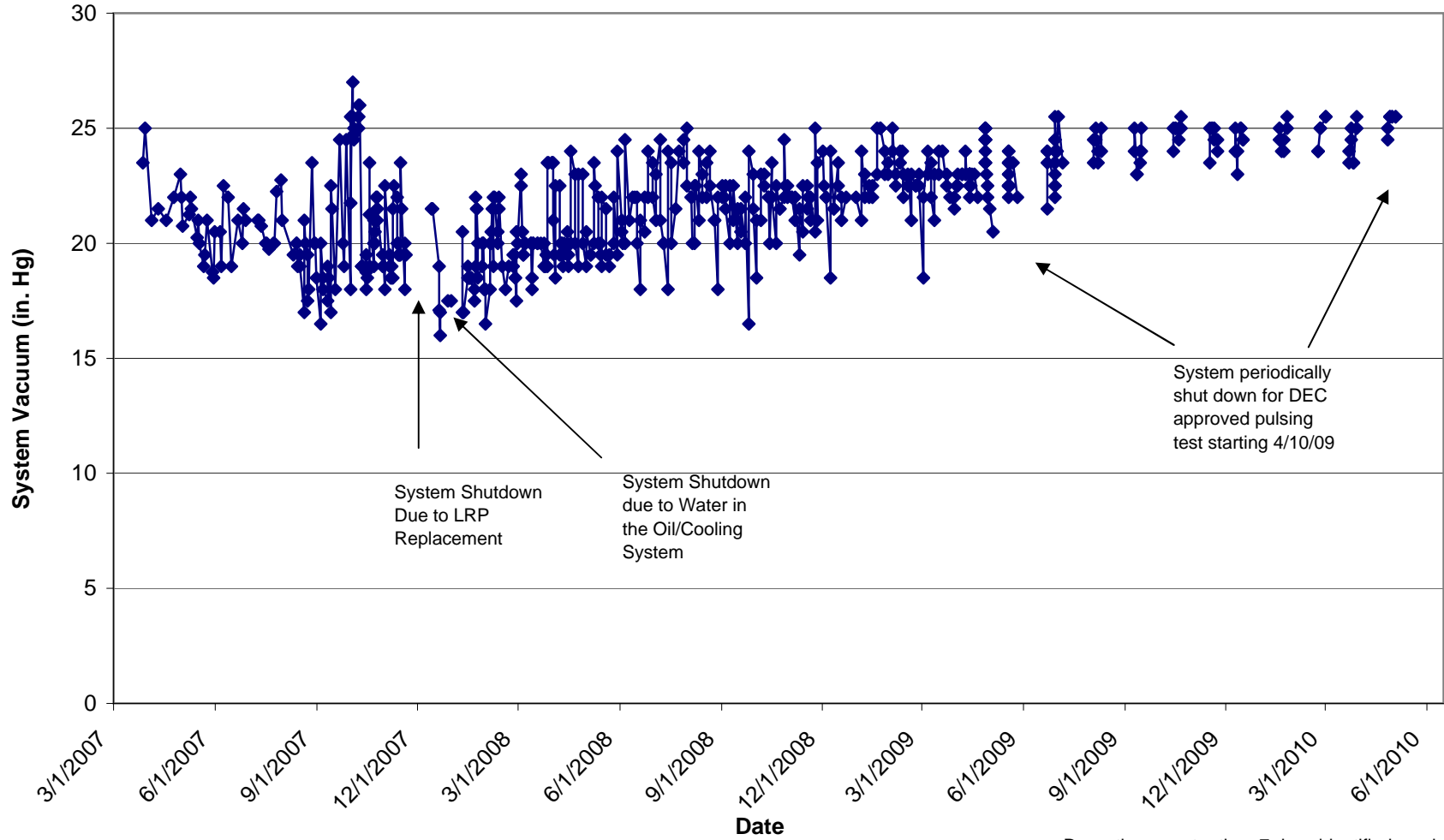


Figure 4

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
April 2010

System Vacuum



-Down time greater than 7 days identified on chart

Figure 5

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
April 2010

System Vapor Flow Rate

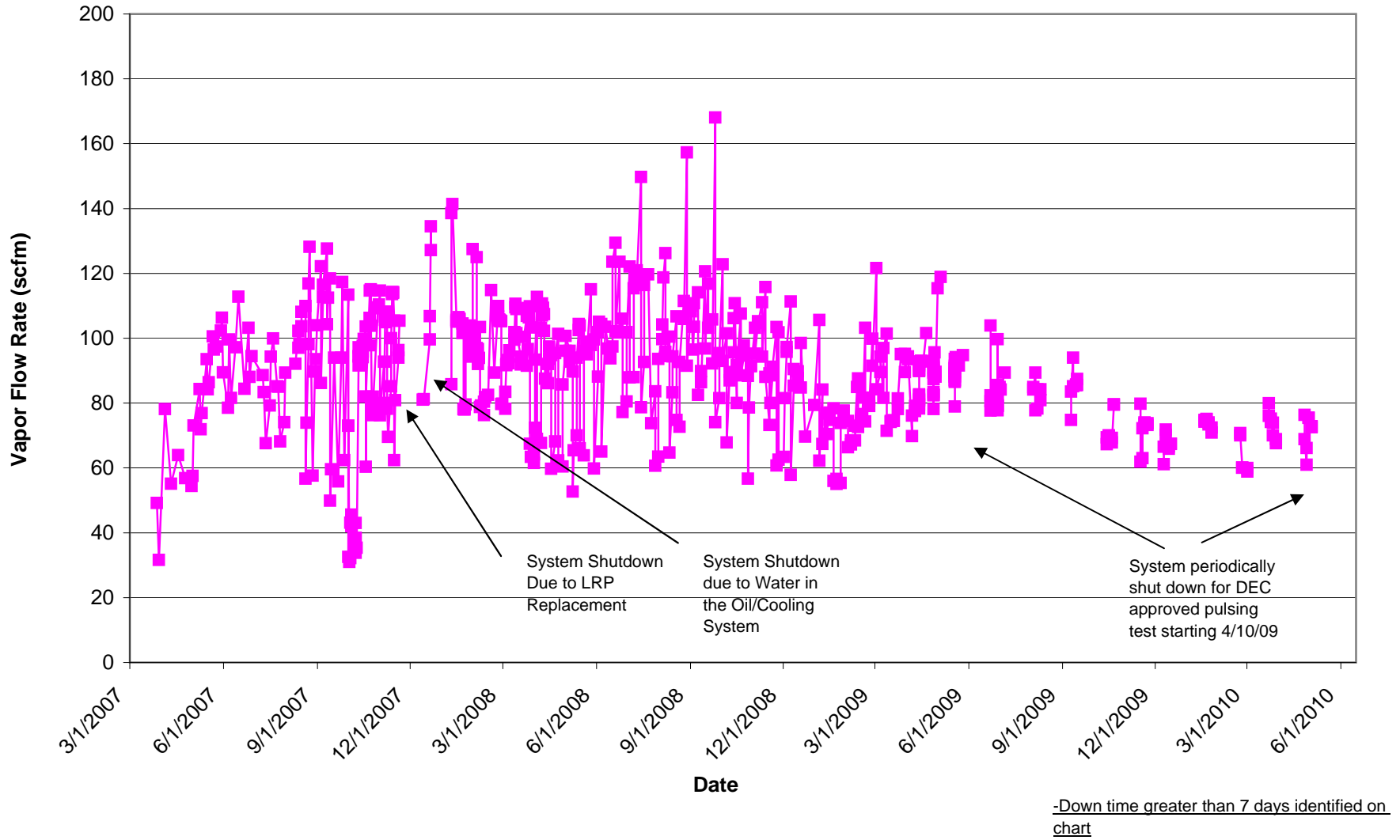


Figure 6

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
April 2010

Total MeCl Mass Removed (Ground Water)

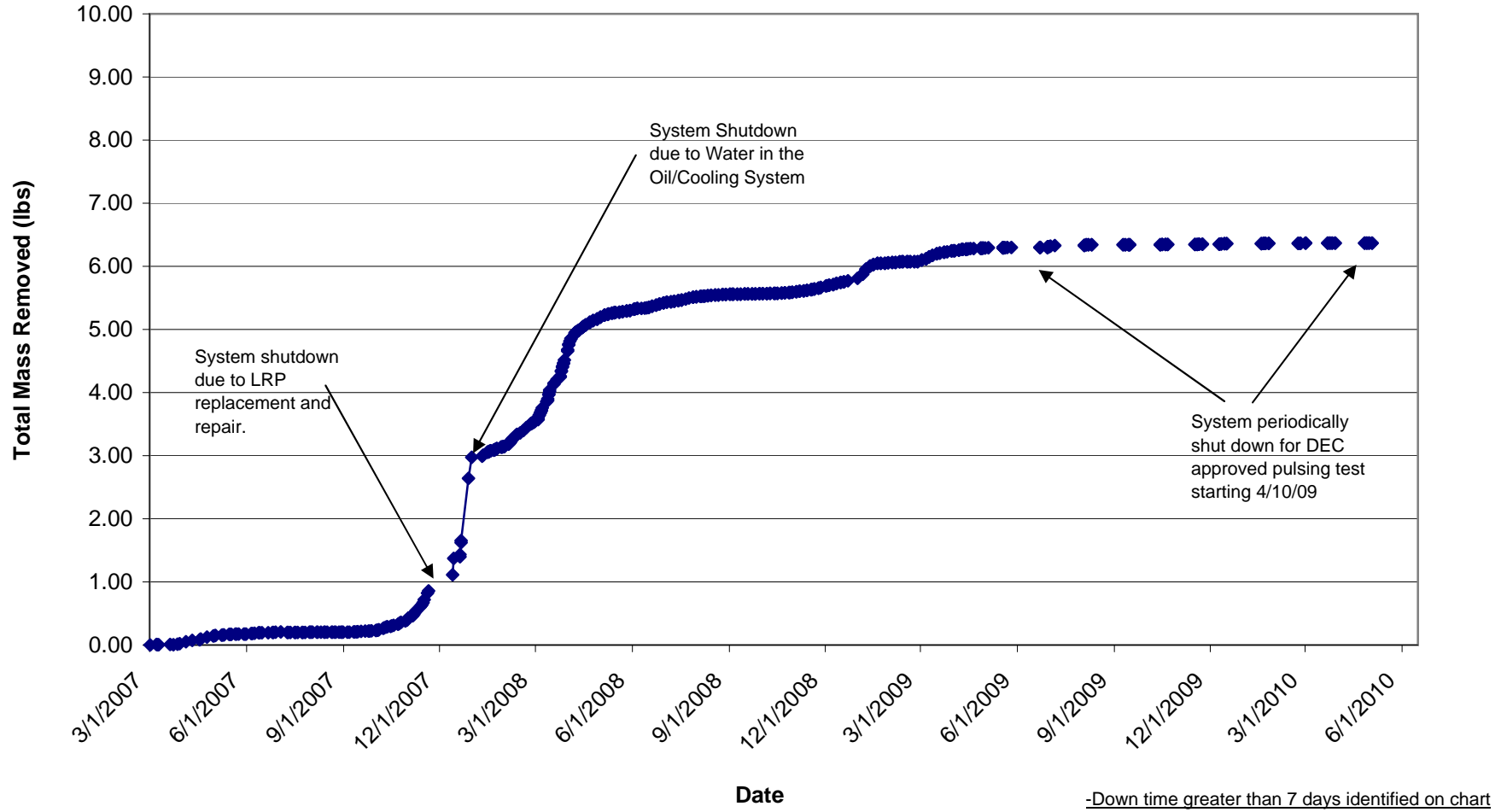


Figure 7

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
April 2010

MeCl Mass Removal Rate (Ground Water)

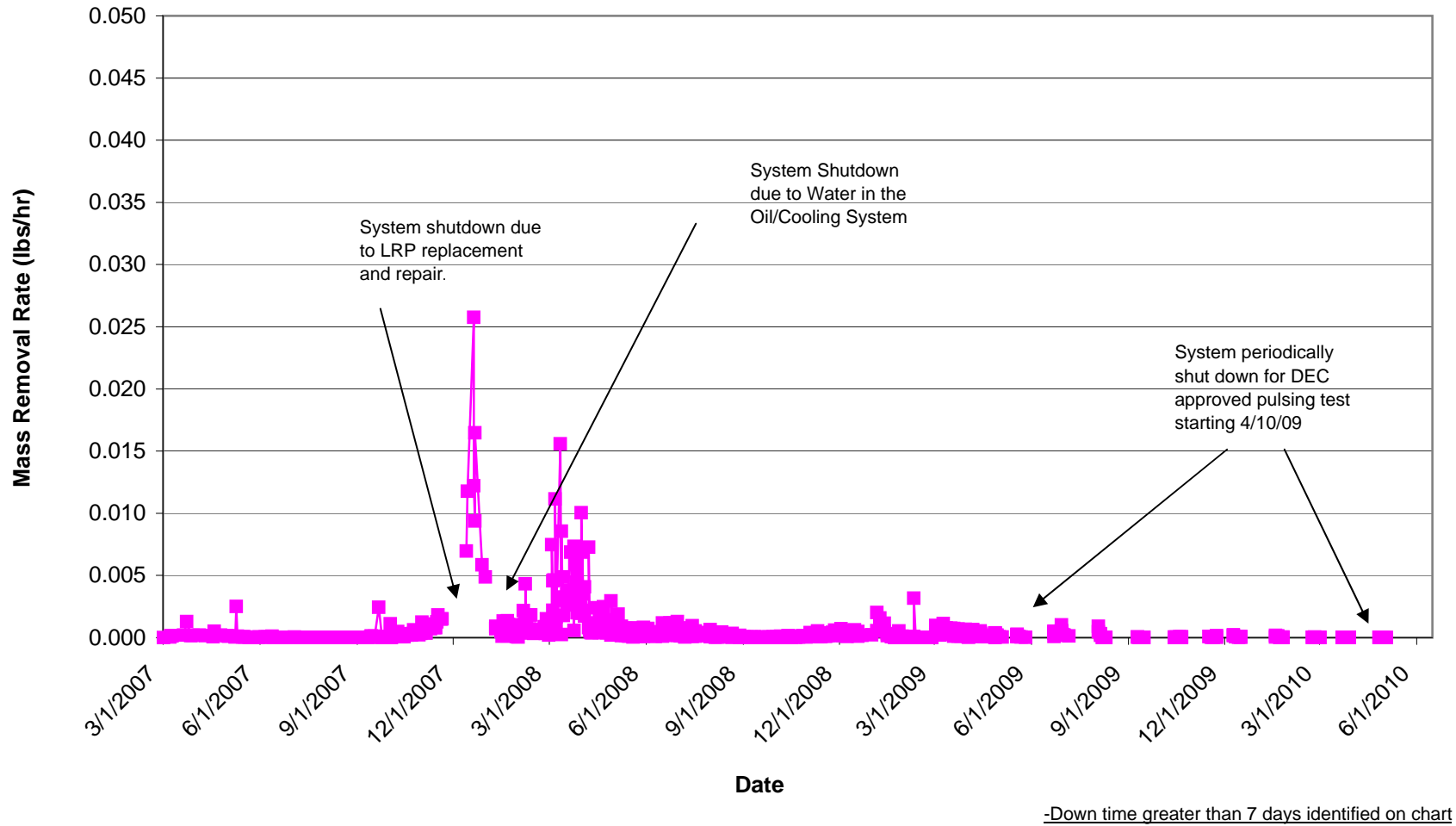


Figure 8

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
April 2010

Cumulative Ground Water Flow

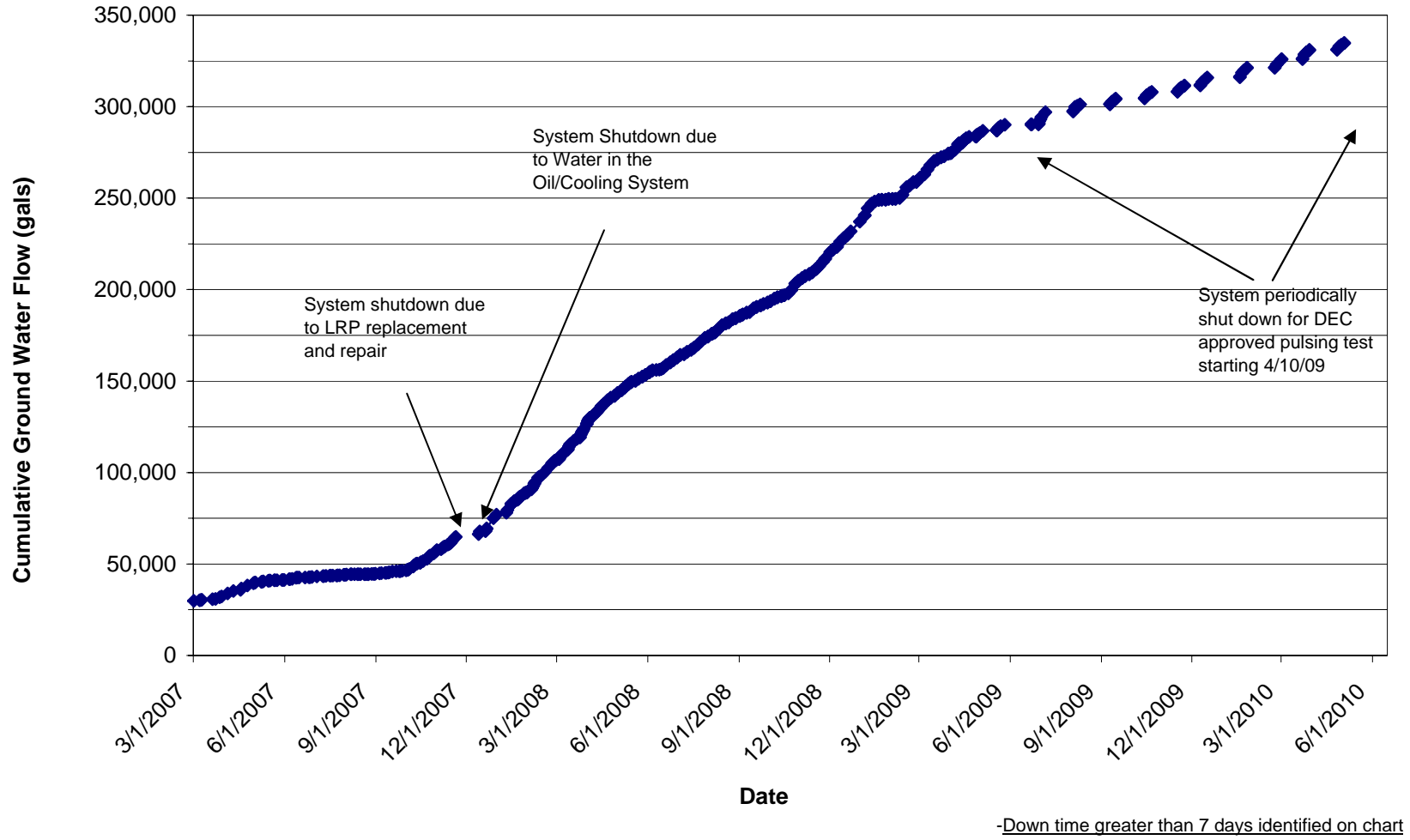
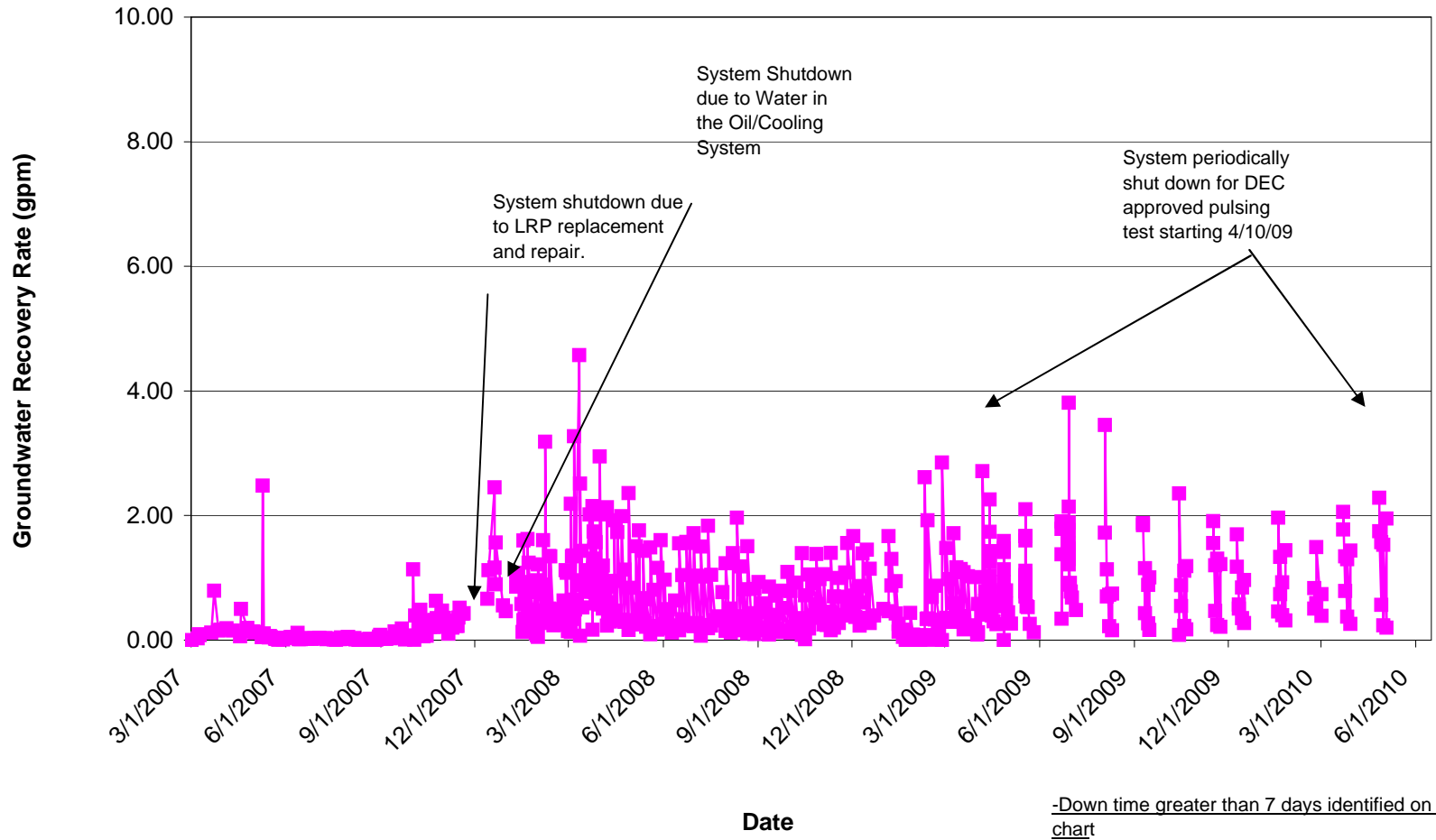


Figure 9

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
April 2010

Ground Water Recovery Rate



Volatile Analysis Report for Water

Client: Quantum Management Group

Client Job Site:	MPRS @ UCB Jefferson Rd.	Lab Project Number:	10-1692
Client Job Number:	N/A	Lab Sample Number:	6077
Field Location:	PreBT / Inf. 1,2,3 Comp	Date Sampled:	04/28/2010
Field ID Number:	N/A	Date Received:	04/28/2010
Sample Type:	Water	Date Analyzed:	04/29/2010

Liquid Influent

Compounds	Results in ug / L
Acetone	ND< 10.0
Amyl Acetate	ND< 25.0
Benzene	ND< 0.700
2-Butanone	ND< 10.0
Carbon disulfide	ND< 5.00
Chloroform	ND< 2.00
Chloromethane	ND< 2.00
cis-1,2-Dichloroethene	ND< 2.00
Ethyl acetate	ND< 25.0
Isopropyl acetate	ND< 25.0
Methylene chloride	10.9
m,p-Xylene	ND< 2.00
o-Xylene	ND< 2.00

ELAP Number 10958

Method: EPA 624

Data File: V74898.D

Comments: ND denotes Non Detect
ug / L = microgram per Liter

Signature: _____


Bruce Hoogesteger, Technical Director

Volatile Analysis Report for AirClient: **Quantum Management Group**

Client Job Site:	MPRS @ UCB Jefferson Rd.	Lab Project Number:	10-1692
Client Job Number:	N/A	Lab Sample Number:	6078
Field Location:	SP-102 Tedlar Bag	Date Sampled:	04/28/2010
Field ID Number:	N/A	Date Received:	04/28/2010
Sample Type:	Air	Date Analyzed:	04/30/2010

Vapor Influent

Compound	Results in PPBv	Results in ug / m3
Acetone	ND< 4,220	ND< 10,000
Benzene	ND< 627	ND< 2,000
2-Butanone	ND< 3,400	ND< 10,000
Carbon disulfide	ND< 643	ND< 2,000
Chloroform	ND< 414	ND< 2,000
Chloromethane	ND< 978	ND< 2,000
cis-1,2-Dichloroethene	ND< 509	ND< 2,000
Methylene chloride	ND< 1,460	ND< 5,000
m,p-Xylene	ND< 461	ND< 2,000
o-Xylene	ND< 461	ND< 2,000

ELAP Number 10958

Method: EPA 8260B
Modified for Tedlar Bag

Data File: V74933.D

Comments: ND denotes Non Detect
PPBv = Parts per Billion volume
ug / m3 - Microgram per cubic meter.

Signature: _____

Bruce Hoogesteger, Technical Director



June 9, 2010

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: Monthly Progress Report – May 2010
755 Jefferson Road Facility – Henrietta, New York
NYSDEC VCP Number V00126-8

***Key Actions
This Period:***

- **May 1 – May 31, 2010.** The system was intermittently operational in accordance with the NYSDEC approved pulsing plan.

Operations Metrics (May 19 – May 26)

- Operational Time: 170 out of a scheduled 170 hours of operation.
- Uptime Efficiency: 100%
- Volume of Groundwater Treated: 3,547 gallons.
 - Discharged to: The sanitary sewer system.
- Total estimated VOC mass recovered to date: 138.8 lbs.
- Total estimated VOC mass recovered during May: 0.052 lbs.
- Mean estimated VOC mass removal rate for May 2010 versus April 2010: 0.0003 versus 0.0011 lbs/hr.
- General weather conditions: Average precipitation and average temperatures as compared to historical data.

Tables, Figures and Graphs

- Table 1: May Treated Waste Water Flow/Vapor Monitoring Data.
- Table 2: May Recovery Well Rotation Data.
- Figures 1-9: Remedial Effectiveness and Efficiency Platform (REEP) graphs
- Figures 2A and 3A: Selected Remedial Effectiveness and Efficiency Platform (REEP) graphs showing results from April 2009 to present.

***Problems/
Resolutions:***

- None

***Analytical Data
Received:***

- The May 2010 MPRS liquid influent analytical data.
- The May 2010 MPRS vapor influent analytical data.

***Documents
Submitted:***

- Monthly Progress Report for April 2010 dated May 10, 2010.

**Anticipated
Actions –
June
2010:**

- Continue NYSDEC approved pulsing program until permission is granted to terminate system operation.
- Consistent with the draft closure request entitled Methylene Chloride Area Operation Maintenance and Monitoring Final Engineering Report and Petition for Remedial Closeout (Draft) submitted in April 2010 and as discussed at our meeting on May 4th, 2010, we request approval to terminate the pulsing program and terminate operation of the MPRS with the June week-long pulsing event being the last operation of the system.

Comments:

- The attached REEP information is to be utilized as a subjective representation of the overall effectiveness/performance of the system as we are using discontinuous data and PID measurements for the removal calculations. We do not intend this tool as a definitive summary of recovered mass.
- MPRS operation and efficiency, inclusive of the replacement LRP pump and associated upgrades and maintenance, will continue to be monitored until shutdown of the system is approved by NYSDEC.
- Submittal of the Draft MCA OM&M FER, Site Wide Petition for Remedial Closeout and revised Site Management Plan has been completed. Submittal of the final MCA OM&M FER, Site Wide Petition for Remedial Closeout and revised Site Management Plan is tentatively scheduled for late June, if final comments from the NYSDEC are received by June 11th..

**NYSDEC-
Approved Field
Decisions:**

- Continuation of pulsing of MPRS system in accordance with the procedure presented to NYSDEC. Based upon discussions with NYSDEC, it is anticipated that the system will be pulsed during the month of May and then, if approval by the Department is given, shut down permanently.

If you have any questions regarding this monthly report or progress on the project, please don't hesitate to contact me at 513-314-7543 or rbethel@qmg-inc.com.

Sincerely,
QUANTUM MANAGEMENT GROUP, INC.



Rick Bethel
Senior Associate

Attachments

cc:

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TABLE 1 - TREATED WASTE WATER FLOW/VAPOR MONITORING DATA
MCA REMEDIATION SYSTEM
755 JEFFERSON ROAD, HENRIETTA, NEW YORK
NYSDEC VCP NUMBER V00126-8
May 2010

Date	Time ¹	Cumulative Hours ²	Total Flow ³ Gallons	Flow Rate ⁴ Gal/Min	Cumulative Gallons ^{5,6}	Influent PID (ppm)	Effluent PID (ppm)
5/3/2010	11:17	40270.3	185	2.0	334,842	0.2	0.0
5/19/2010	9:38	40270.7	56	2.7	334,898	0.1	0.0
5/19/2010	11:35	40272.6	272	2.4	335,170	0.1	0.0
5/21/2010	9:15	40318.3	1,466	0.5	336,636	0.4	0.0
5/21/2010	11:20	40320.3	206	1.7	336,842	0.2	0.0
5/24/2010	9:15	40390.3	1,087	0.3	337,929	0.3	0.0
5/24/2010	11:25	40392.5	177	1.4	338,106	0.1	0.0
5/26/2010	9:15	40438.3	156	0.1	338,262	0.2	0.0
5/26/2010	11:00	40440.0	127	1.2	338,389	0.1	0.0

¹Time of day (in military time) data was collected.

² Cumulative Hours represents the number of run-hours since MCA remediation system start-up on 12 July 2006.

³ Total Flow in Gallons represents the flow that occurred since the time the last measurement was collected, as indicated in the previous row of the table.

⁴ Flow Rate in Gallons/Minute represents the average flow rate since the time the last measurement was collected, as indicated in the previous row of the

⁵ Cumulative Gallons represents the number of gallons of water treated by the MCA remediation system since start-up on 12 July 2006.

⁶ Totalizer Flow readings collected from newly installed totalizer beginning October 2, 2007.

TABLE 2 - RECOVERY WELL ROTATION DATA
MCA REMEDIATION SYSTEM
755 JEFFERSON ROAD, HENRIETTA, NEW YORK
NYSDEC VCP NUMBER V00126-8
May 2010

Date	Well Rotation Clusters								
	EXSB-2	MW-D8	MW -21	MW-22	MW-20A	MW-20B	RW-6	RW-5	RW-4
May 1-18	System shut down as part of NYSDEC approved pulsing program								
May 19-May 26		X						X	X
May 27-31	System shut down as part of NYSDEC approved pulsing program								

Figure 1
MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
May 2010

Total VOC Mass Removed (Vapor and Ground Water Combined)

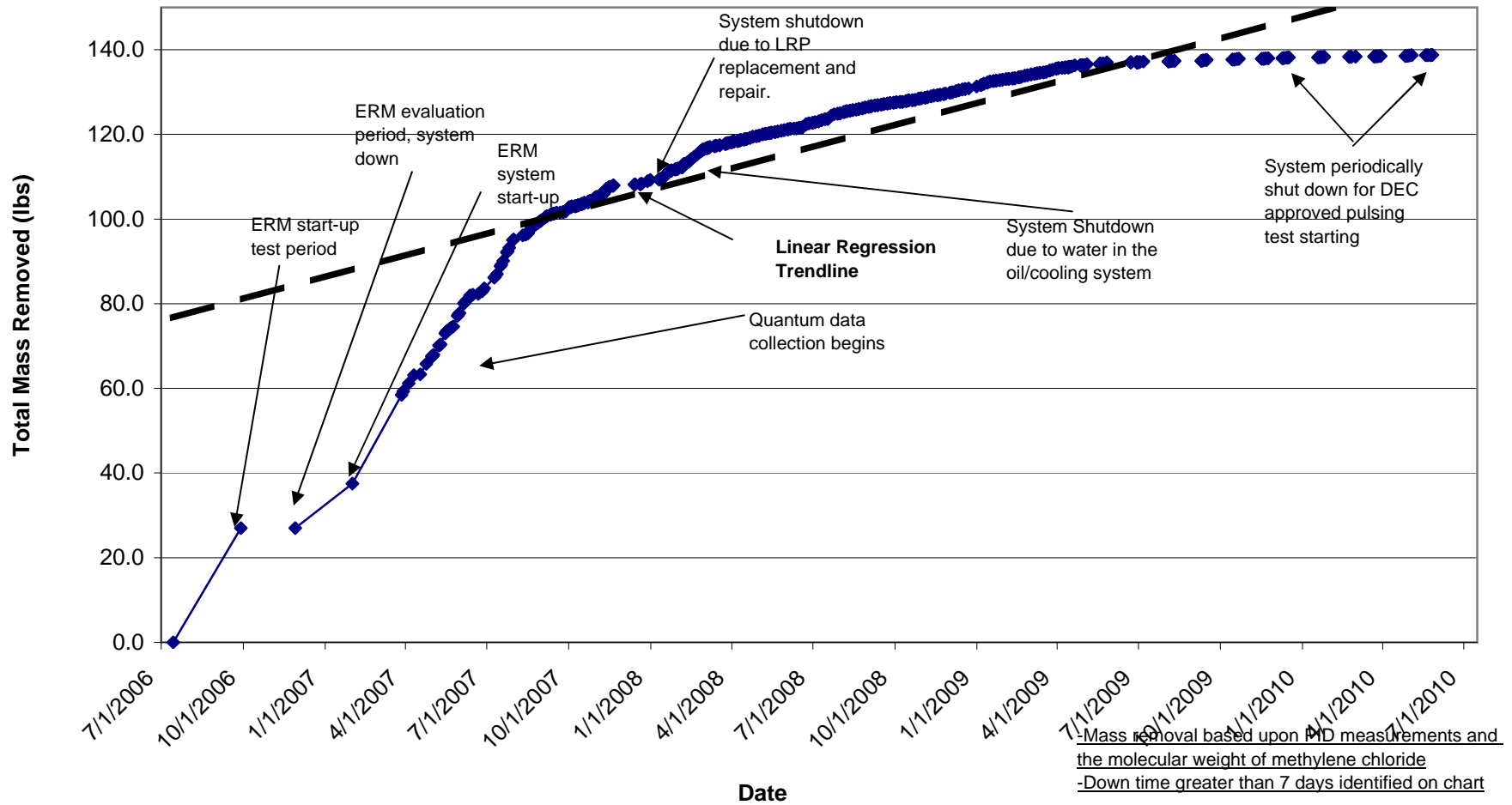


Figure 2
MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
May 2010

Total VOC Mass Removal Rate (Vapor & Ground Water Combined)

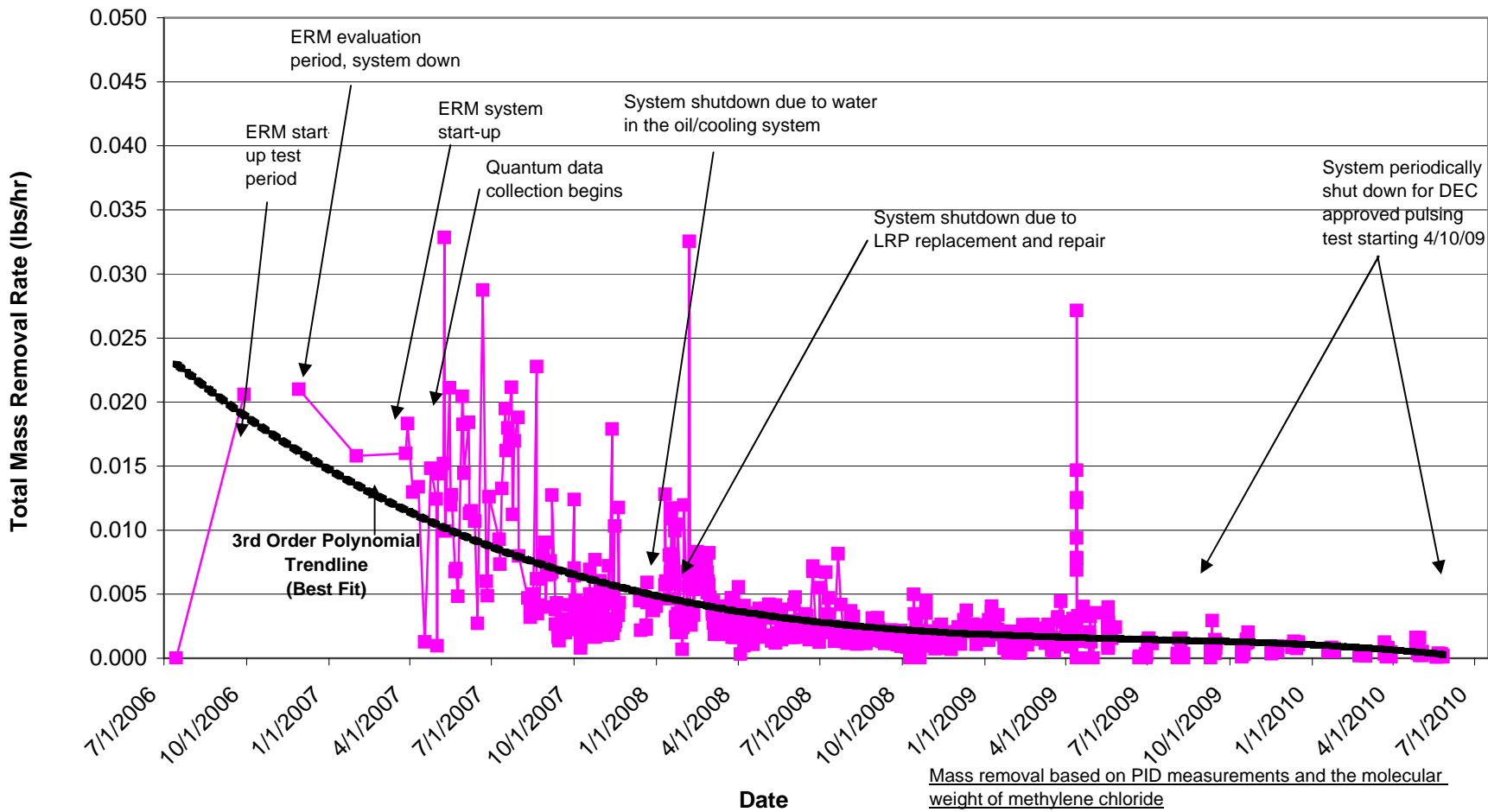


Figure 2A

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
May 2010

Total VOC Mass Removal Rate (Vapor & Ground Water Combined) Since April 2009

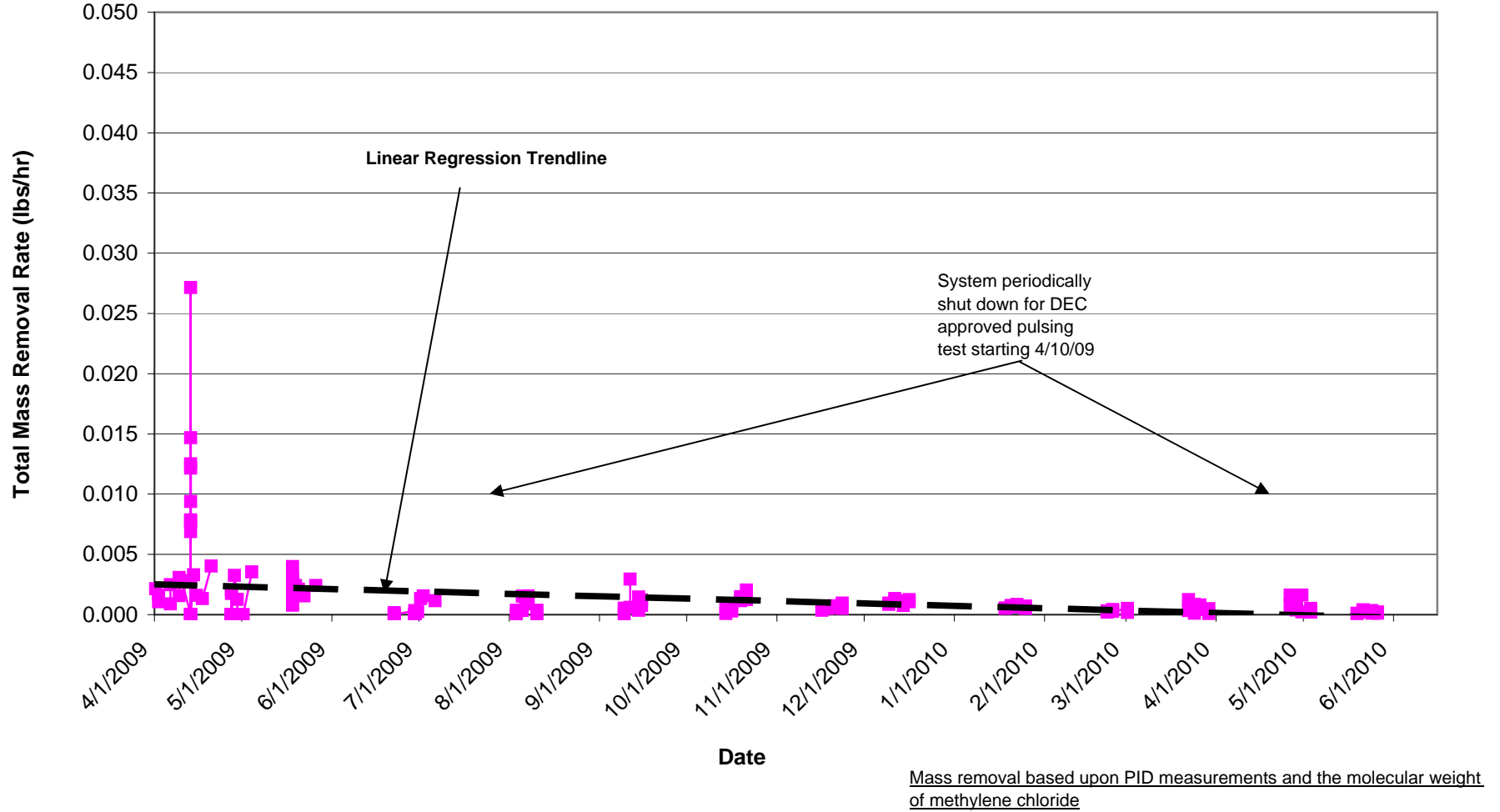


Figure 3

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
May 2010

Vapor Mass Removal Rate

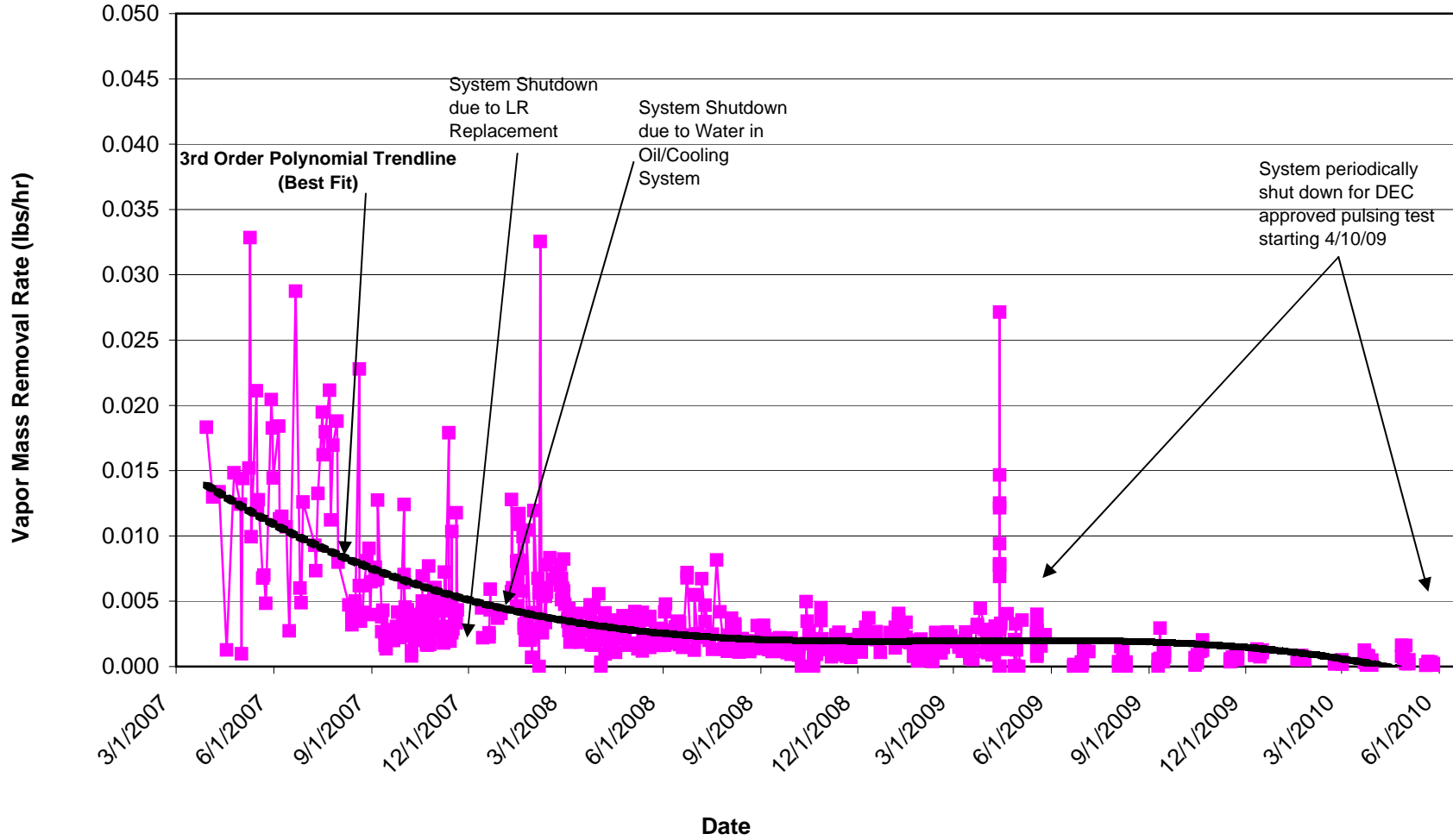


Figure 3A

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
May 2010

Vapor Mass Removal Rate Since April 2009

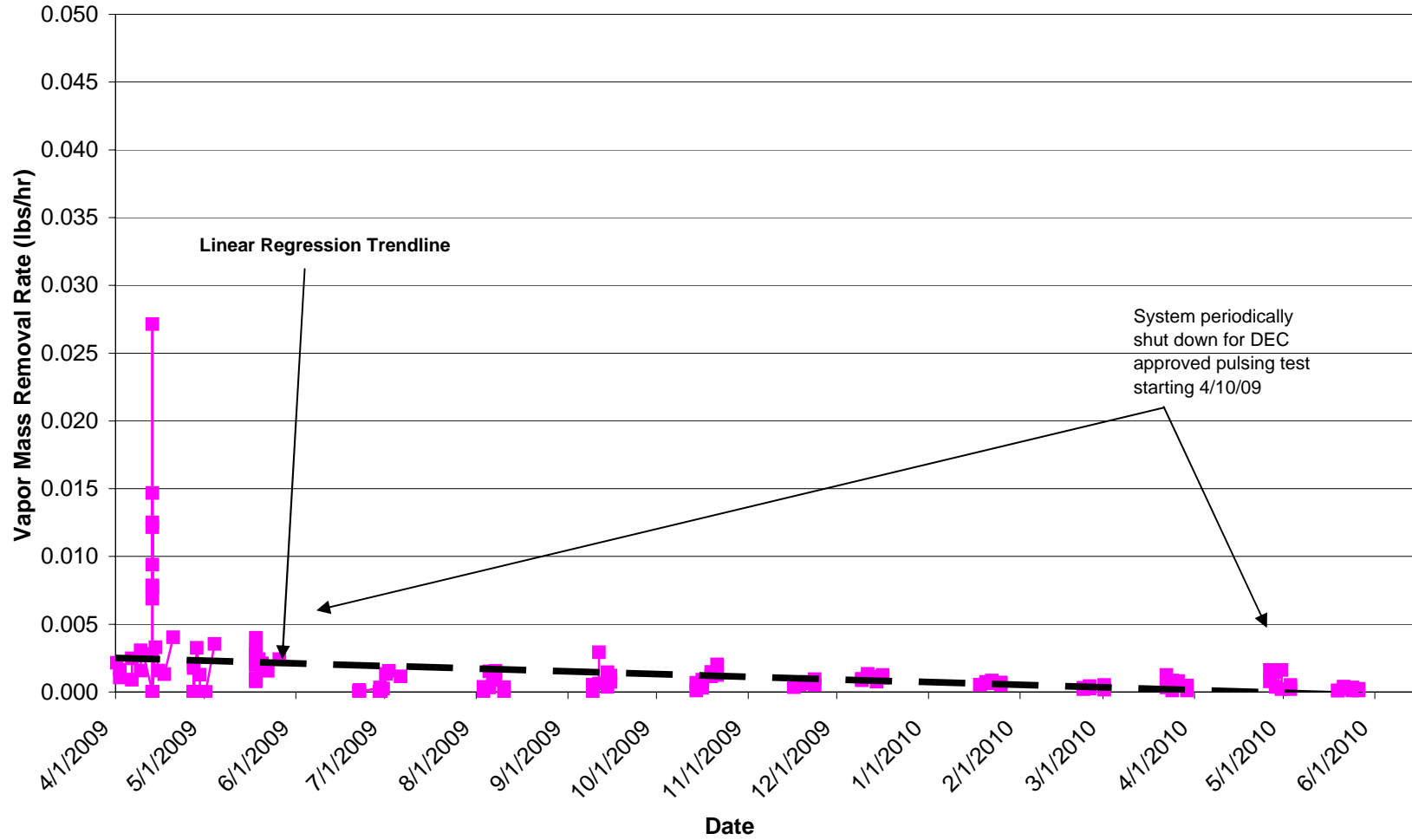


Figure 4

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
May 2010

System Vacuum

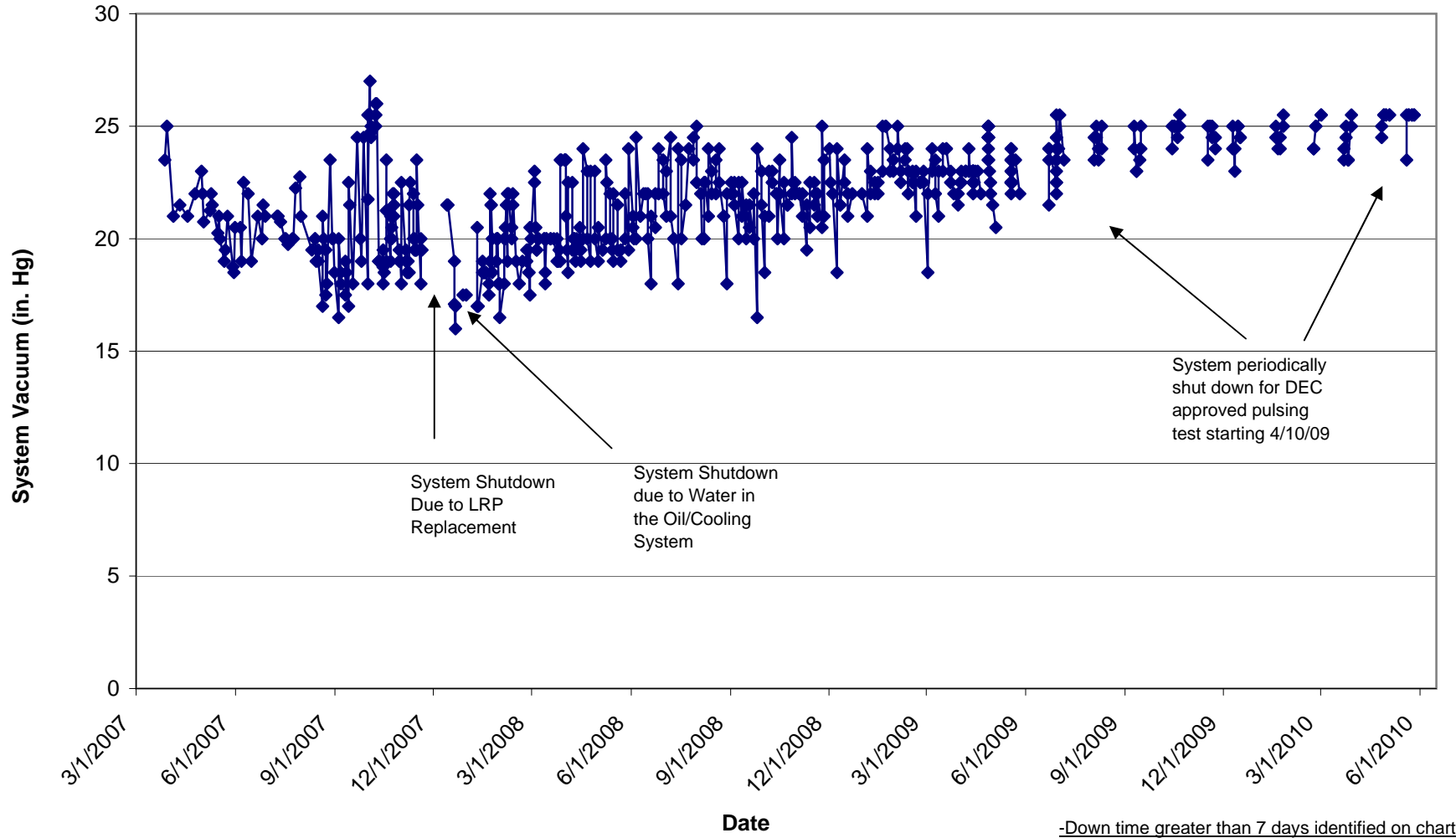


Figure 5

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
May 2010

System Vapor Flow Rate

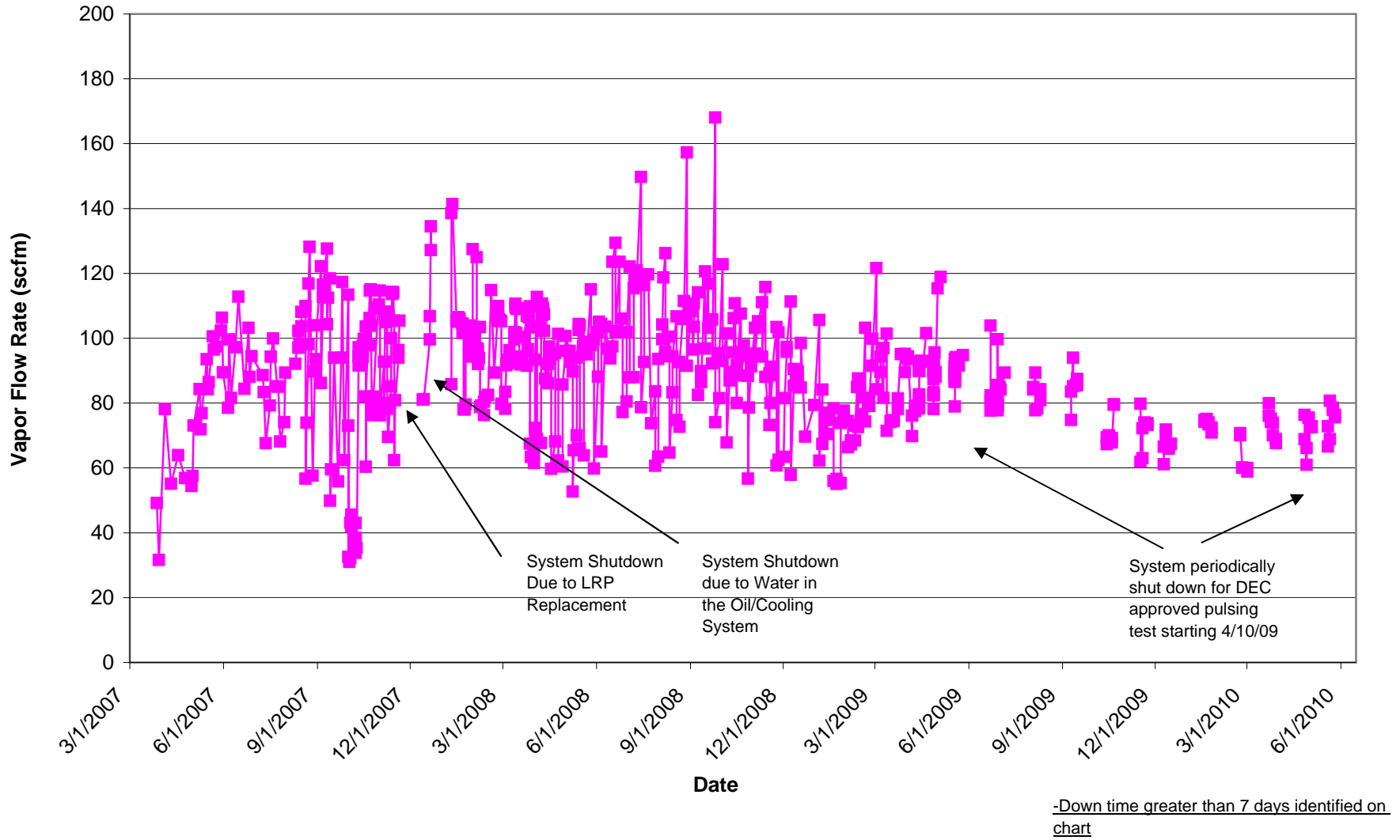


Figure 6

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
May 2010

Total MeCl Mass Removed (Ground Water)

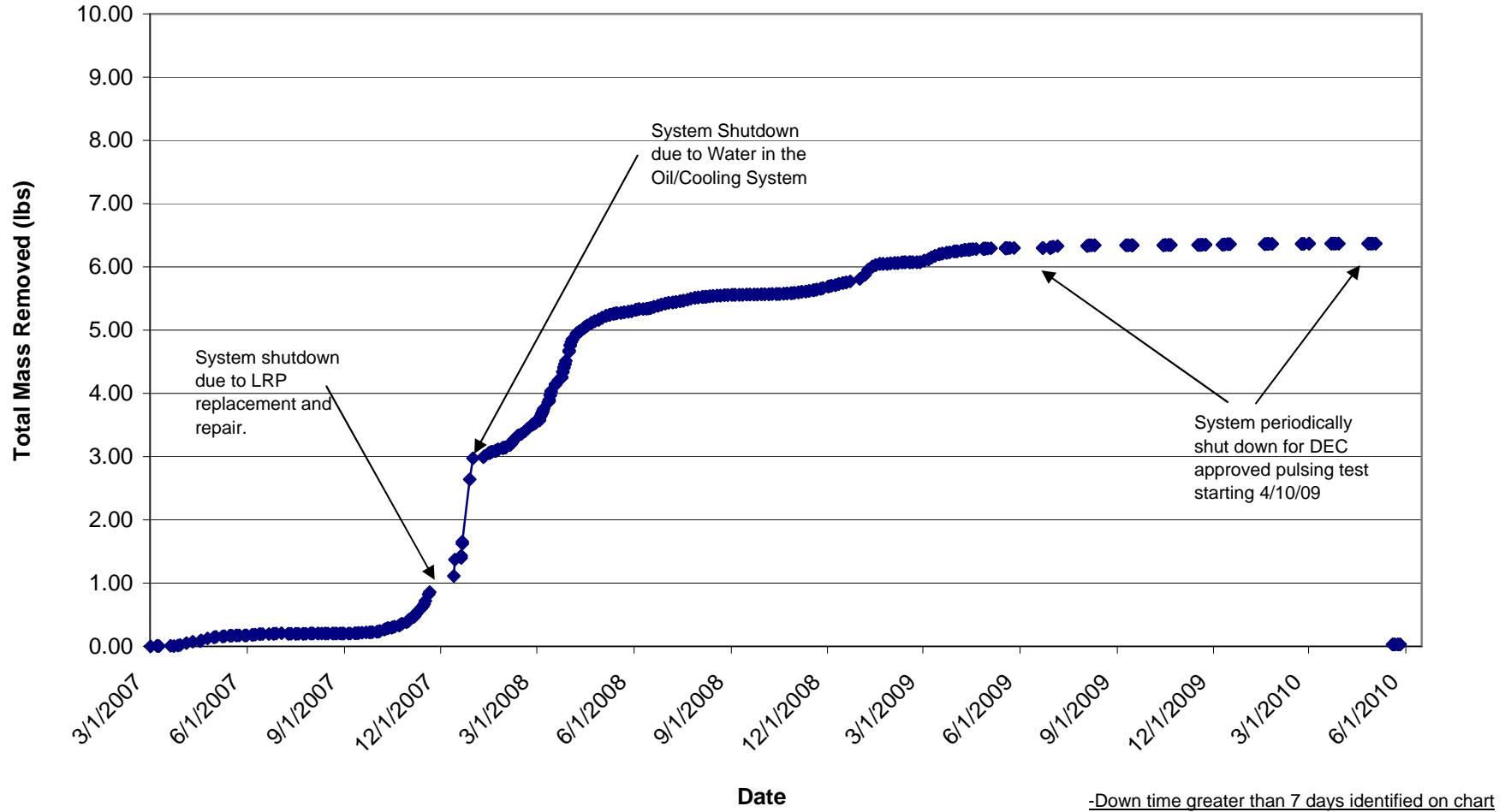


Figure 7

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
May 2010

MeCl Mass Removal Rate (Ground Water)

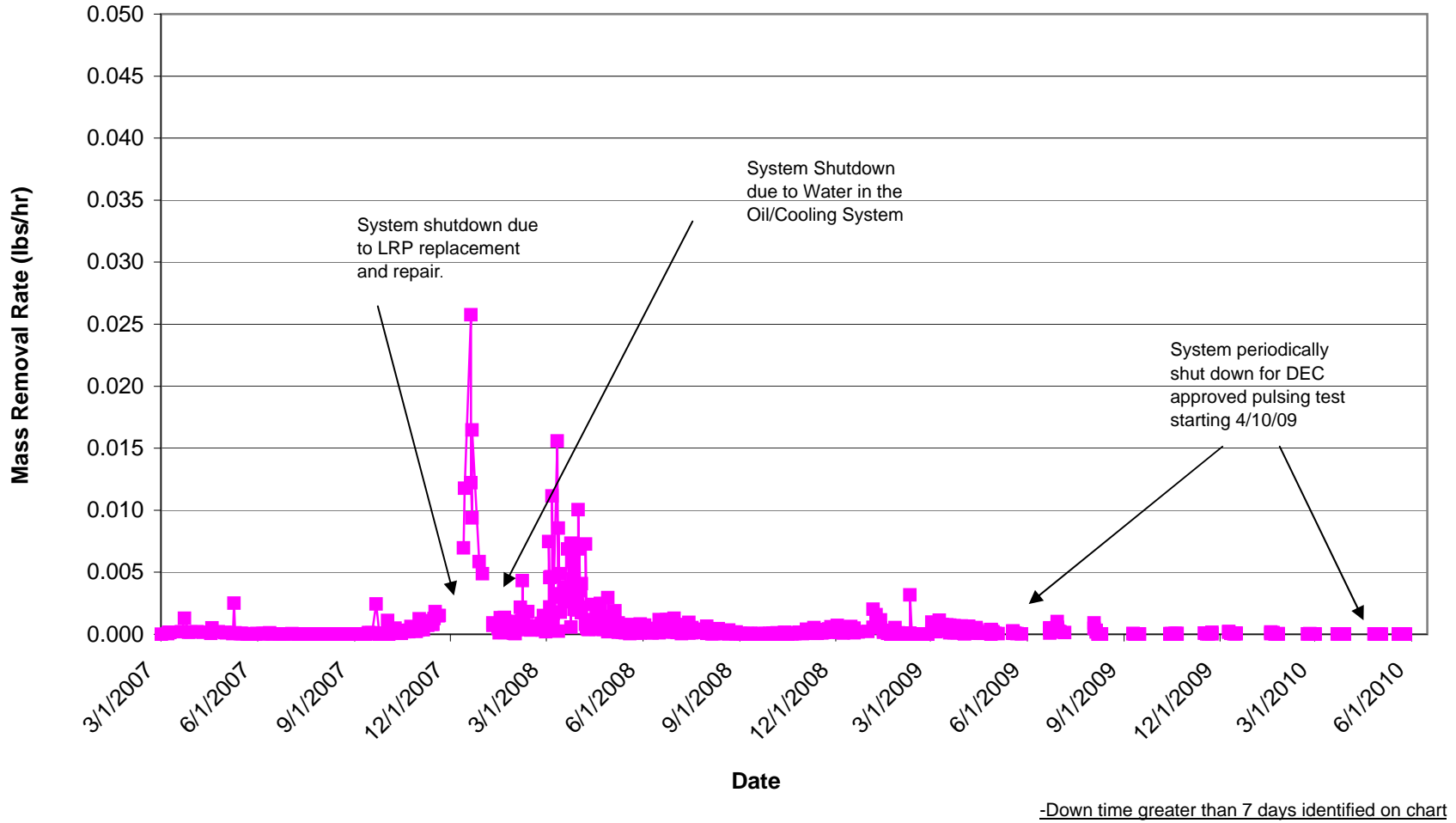


Figure 8

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
May 2010

Cumulative Ground Water Flow

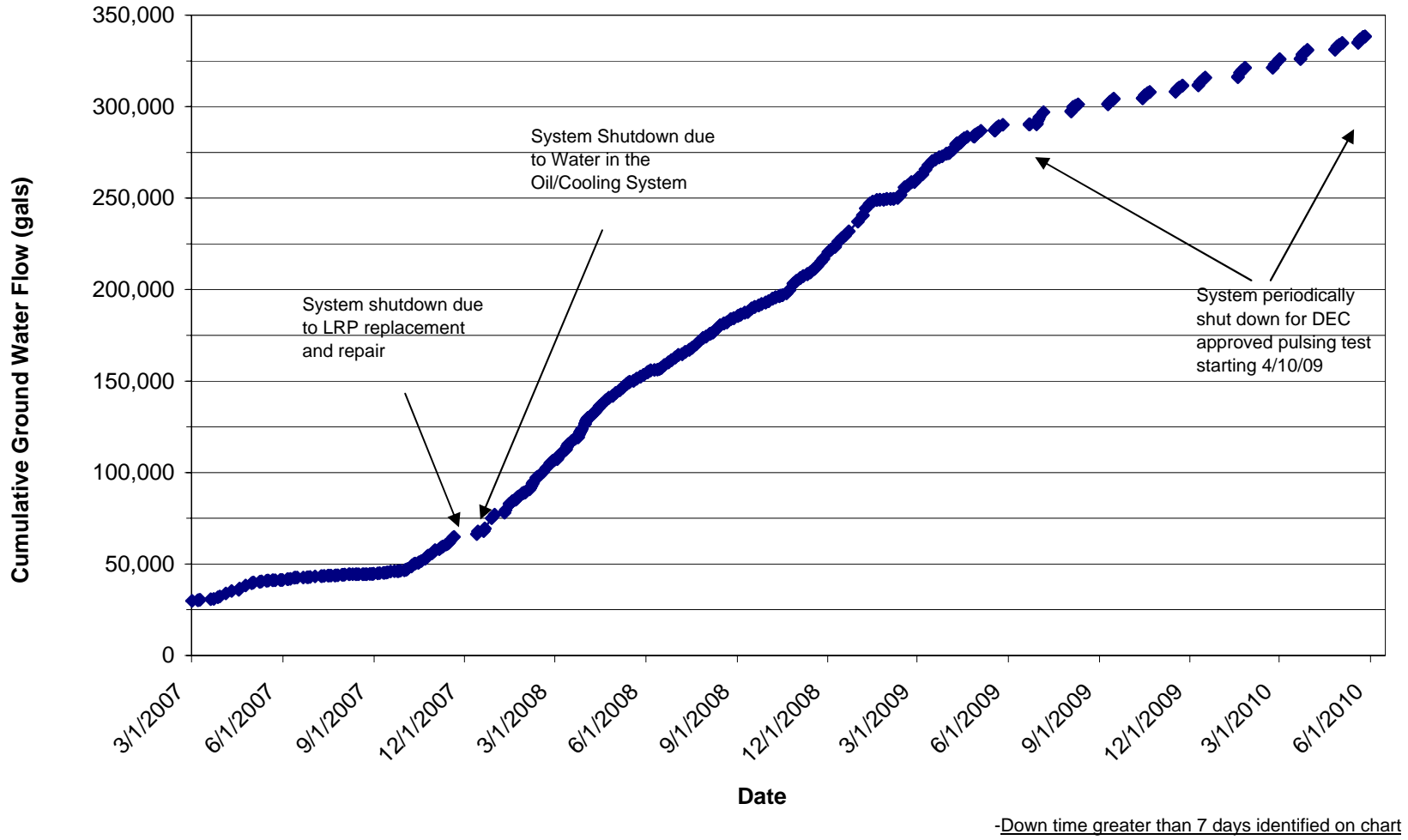
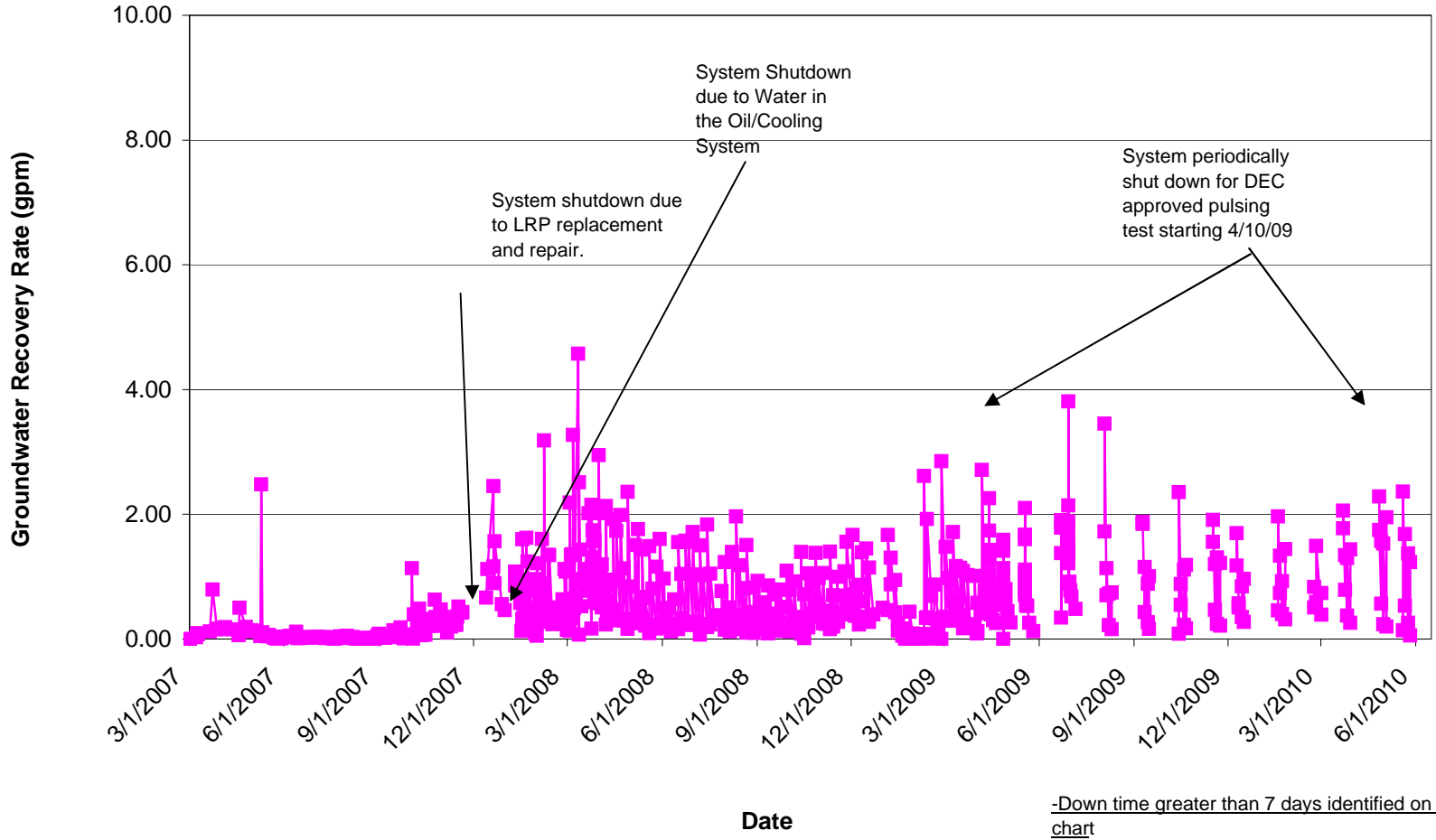


Figure 9

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
May 2010

Ground Water Recovery Rate



Volatile Analysis Report for Water

Client: Quantum Management Group

Client Job Site:	MPRS @ UCB Jefferson Rd.	Lab Project Number:	10-2087
		Lab Sample Number:	7184
Client Job Number:	N/A	Date Sampled:	05/21/2010
Field Location:	PreBT / Inf. 1,2,3 Comp	Date Received:	05/21/2010
Field ID Number:	N/A	Date Analyzed:	05/25/2010
Sample Type:	Water		

Liquid Influent

Compounds	Results in ug / L
Acetone	ND< 10.0
Amyl Acetate	ND< 25.0
Benzene	ND< 0.700
2-Butanone	ND< 10.0
Carbon disulfide	ND< 5.00
Chloroform	ND< 2.00
Chloromethane	ND< 2.00
cis-1,2-Dichloroethene	ND< 2.00
Ethyl acetate	ND< 25.0
Isopropyl acetate	ND< 25.0
Methylene chloride	14.8
m,p-Xylene	ND< 2.00
o-Xylene	ND< 2.00

ELAP Number 10958

Method: EPA 624

Data File: V75557.D

Comments: ND denotes Non Detect
ug / L = microgram per Liter
Surrogate outliers indicate probable matrix interference

Signature:


Bruce Hoogesteger: Technical Director

Volatile Analysis Report for Air

Client: Quantum Management Group

Client Job Site: MPRS @ UCB Jefferson Rd.	Lab Project Number: 10-2087
	Lab Sample Number: 7185
Client Job Number: N/A	
Field Location: SP-102 Tedlar Bag	Date Sampled: 05/21/2010
Field ID Number: N/A	Date Received: 05/21/2010
Sample Type: Air	Date Analyzed: 05/26/2010

Vapor Influent

Compound	Results in PPBv	Results in ug / m3
Acetone	ND< 4,220	ND< 10,000
Benzene	ND< 627	ND< 2,000
2-Butanone	ND< 3,400	ND< 10,000
Carbon disulfide	ND< 643	ND< 2,000
Chloroform	ND< 414	ND< 2,000
Chloromethane	ND< 978	ND< 2,000
cis-1,2-Dichloroethene	ND< 509	ND< 2,000
Methylene chloride	ND< 1,460	ND< 5,000
m,p-Xylene	ND< 461	ND< 2,000
o-Xylene	ND< 461	ND< 2,000

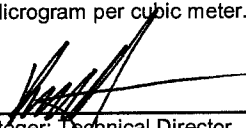
ELAP Number 10958

 Method: EPA 8260B
 Modified for Tedlar Bag

Data File: V75577.D

Comments: ND denotes Non Detect
 PPBv = Parts per Billion volume
 ug / m3 - Microgram per cubic meter.

Signature:



 Bruce Hoogesteger, Technical Director



July 9, 2010

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: Monthly Progress Report – June 2010
755 Jefferson Road Facility – Henrietta, New York
NYSDEC VCP Number V00126-8

***Key Actions
This Period:***

- **June 1 – June 30, 2010.** The system was intermittently operational in accordance with the NYSDEC approved pulsing plan.

Operations Metrics (June 14 – June 21)

- Operational Time: 170 out of a scheduled 170 hours of operation.
- Uptime Efficiency: 100%
- Volume of Groundwater Treated: 3,929 gallons.
 - Discharged to: The sanitary sewer system.
- Total estimated VOC mass recovered to date: 138.8 lbs.
- Total estimated VOC mass recovered during June: 0.036 lbs.
- Mean estimated VOC mass removal rate for June 2010 versus May 2010: 0.0002 versus 0.0003 lbs/hr.
- General weather conditions: Average precipitation and average temperatures as compared to historical data.

Tables, Figures and Graphs

- Table 1: June Treated Waste Water Flow/Vapor Monitoring Data.
- Table 2: June Recovery Well Rotation Data.
- Figures 1-9: Remedial Effectiveness and Efficiency Platform (REEP) graphs
- Figures 2A and 3A: Selected Remedial Effectiveness and Efficiency Platform (REEP) graphs showing results from April 2009 to present.

***Problems/
Resolutions:***

- None

***Analytical Data
Received:***

- The June 2010 MPRS liquid influent analytical data.
- The June 2010 MPRS liquid effluent analytical data. Analytical results are within MCPW permit requirements.
- The June 2010 MPRS vapor influent analytical data.

***Documents
Submitted:***

- Monthly Progress Report for May 2010 dated June 9, 2010.

**Anticipated
Actions –
July
2010:**

- Consistent with the draft closure request entitled Methylene Chloride Area Operation Maintenance and Monitoring Final Engineering Report and Petition for Remedial Closeout (Draft) submitted in April 2010 and as discussed at our meeting on May 4th, 2010, we request approval to terminate the pulsing program and terminate operation of the MPRS with the June week-long pulsing event being the last operation of the system.
- Email correspondence was sent to the Department on June 22, 2010 regarding upcoming well abandonment/paving activities at the site. If the Department is in agreement with our approach we would hope to begin the abandonment process as soon as possible in order to not interfere with the upcoming paving activities at the site.

Comments:

- The attached REEP information is to be utilized as a subjective representation of the overall effectiveness/performance of the system as we are using discontinuous data and PID measurements for the removal calculations. We do not intend this tool as a definitive summary of recovered mass.
- MPRS operation and efficiency, inclusive of the replacement LRP pump and associated upgrades and maintenance, will continue to be monitored.
- Submittal of the Draft MCA OM&M FER, Site Wide Petition for Remedial Closeout and revised Site Management Plan has been completed. Submittal of the final MCA OM&M FER, Site Wide Petition for Remedial Closeout and revised Site Management Plan is contingent upon final comments from the NYSDEC.

**NYSDEC-
Approved Field
Decisions:**

- Continuation of pulsing of MPRS system in accordance with the procedure presented to NYSDEC. Based upon discussions with NYSDEC, it is anticipated that the system will be pulsed during the month of June and then, if approval by the Department is given, shut down permanently.

If you have any questions regarding this monthly report or progress on the project, please don't hesitate to contact me at 513-314-7543 or rbethel@qmg-inc.com.

Sincerely,
QUANTUM MANAGEMENT GROUP, INC.



Rick Bethel
Senior Associate

Attachments

cc:

Mr. Jeffrey M. Kosmala, P.E. (MCDOH)
Mr. Michael Bogdan (Sanofi-Aventis)
Mr. Richard Ricci (Lowenstein Sandler PC)
Mr. Mark Byrne, P.E. (Town of Henrietta)
Ms. Libby Ford, (Nixon Peabody)
Mr. Greg Light (UCB)
Mr. George Hollerbach, P.E. (Quantum)

Ms. Melissa Menetti (NYSDOH)
Mr. David Panipinto (UCB)
Mr. Bart Putzig, P.E. (NYSDEC)
Mr. Sean Keenan (MCDES)
Mr. John Lang, P.E. (Quantum)

**TABLE 1 - TREATED WASTE WATER FLOW/VAPOR MONITORING DATA
MCA REMEDIATION SYSTEM
755 JEFFERSON ROAD, HENRIETTA, NEW YORK
NYSDEC VCP NUMBER V00126-8
June 2010**

Date	Time¹	Cumulative Hours²	Total Flow³ Gallons	Flow Rate⁴ Gal/Min	Cumulative Gallons^{5,6}	Influent PID (ppm)	Effluent PID (ppm)
5/26/2010	11:00	40440.0	127	1.2	338,389	0.1	0.0
6/14/2010	9:35	40440.5	11	0.4	338,400	0.4	0.1
6/14/2010	11:33	40442.4	293	2.6	338,693	0.2	0.0
6/16/2010	9:44	40488.6	1,663	0.6	340,356	0.4	0.0
6/16/2010	11:42	40490.5	185	1.6	340,541	0.1	0.0
6/18/2010	9:12	40536.0	767	0.3	341,308	0.2	0.0
6/21/2010	9:15	40608.1	792	0.2	342,100	0.1	0.0
6/21/2010	11:08	40609.9	218	2.0	342,318	0.1	0.0

¹Time of day (in military time) data was collected.

² Cumulative Hours represents the number of run-hours since MCA remediation system start-up on 12 July 2006.

³ Total Flow in Gallons represents the flow that occurred since the time the last measurement was collected, as indicated in the previous row of the table.

⁴ Flow Rate in Gallons/Minute represents the average flow rate since the time the last measurement was collected, as indicated in the previous row of the

⁵ Cumulative Gallons represents the number of gallons of water treated by the MCA remediation system since start-up on 12 July 2006.

⁶ Totalizer Flow readings collected from newly installed totalizer beginning October 2, 2007.

TABLE 2 - RECOVERY WELL ROTATION DATA
MCA REMEDIATION SYSTEM
755 JEFFERSON ROAD, HENRIETTA, NEW YORK
NYSDEC VCP NUMBER V00126-8
June 2010

Date	Well Rotation Clusters								
	EXSB-2	MW-D8	MW -21	MW-22	MW-20A	MW-20B	RW-6	RW-5	RW-4
June 1-13	System shut down as part of NYSDEC approved pulsing program								
June 14-June 21		X						X	X
June 22-30	System shut down as part of NYSDEC approved pulsing program								

Figure 1
MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
June 2010

Total VOC Mass Removed (Vapor and Ground Water Combined)

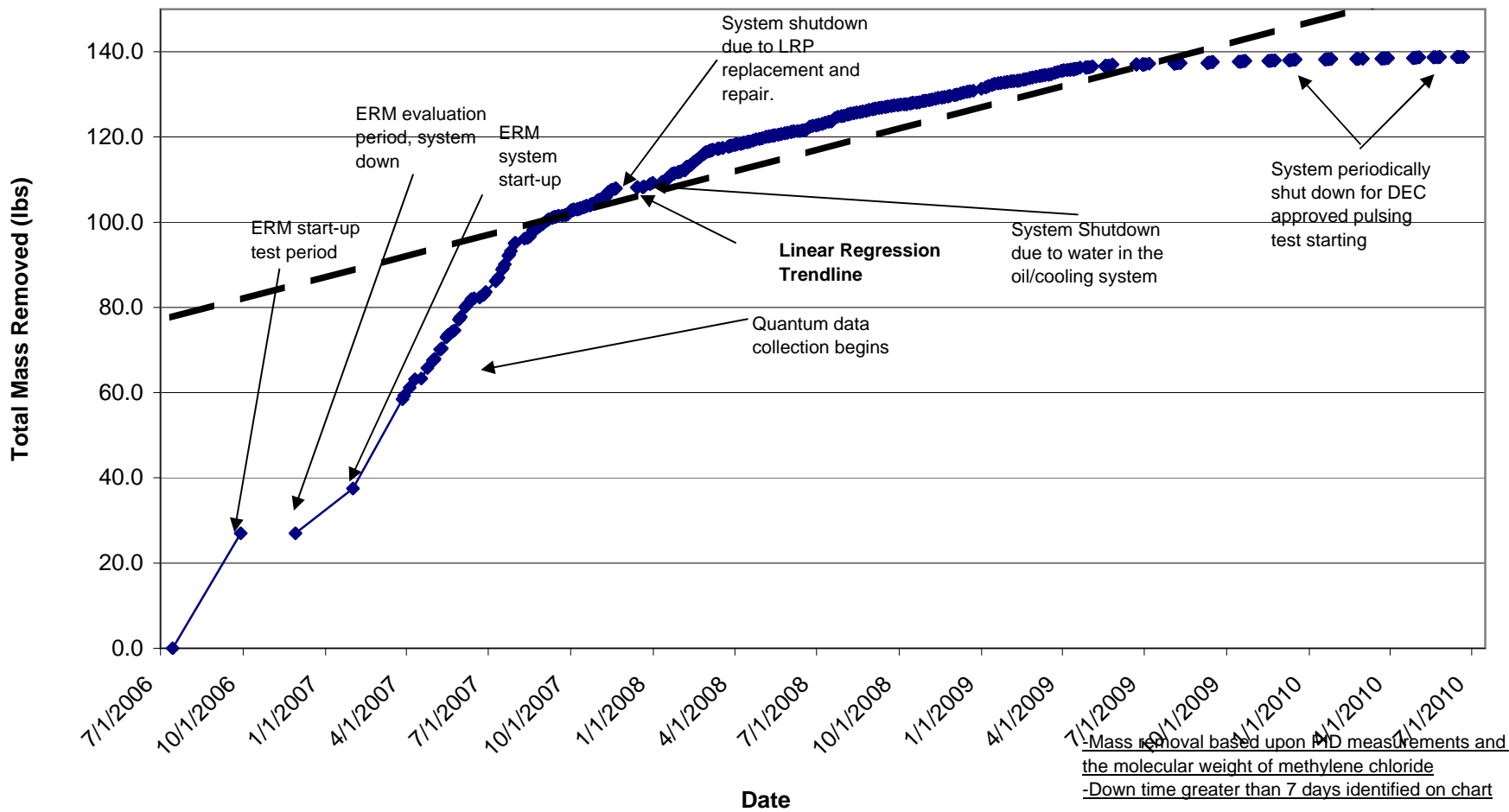


Figure 2
MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
June 2010

Total VOC Mass Removal Rate (Vapor & Ground Water Combined)

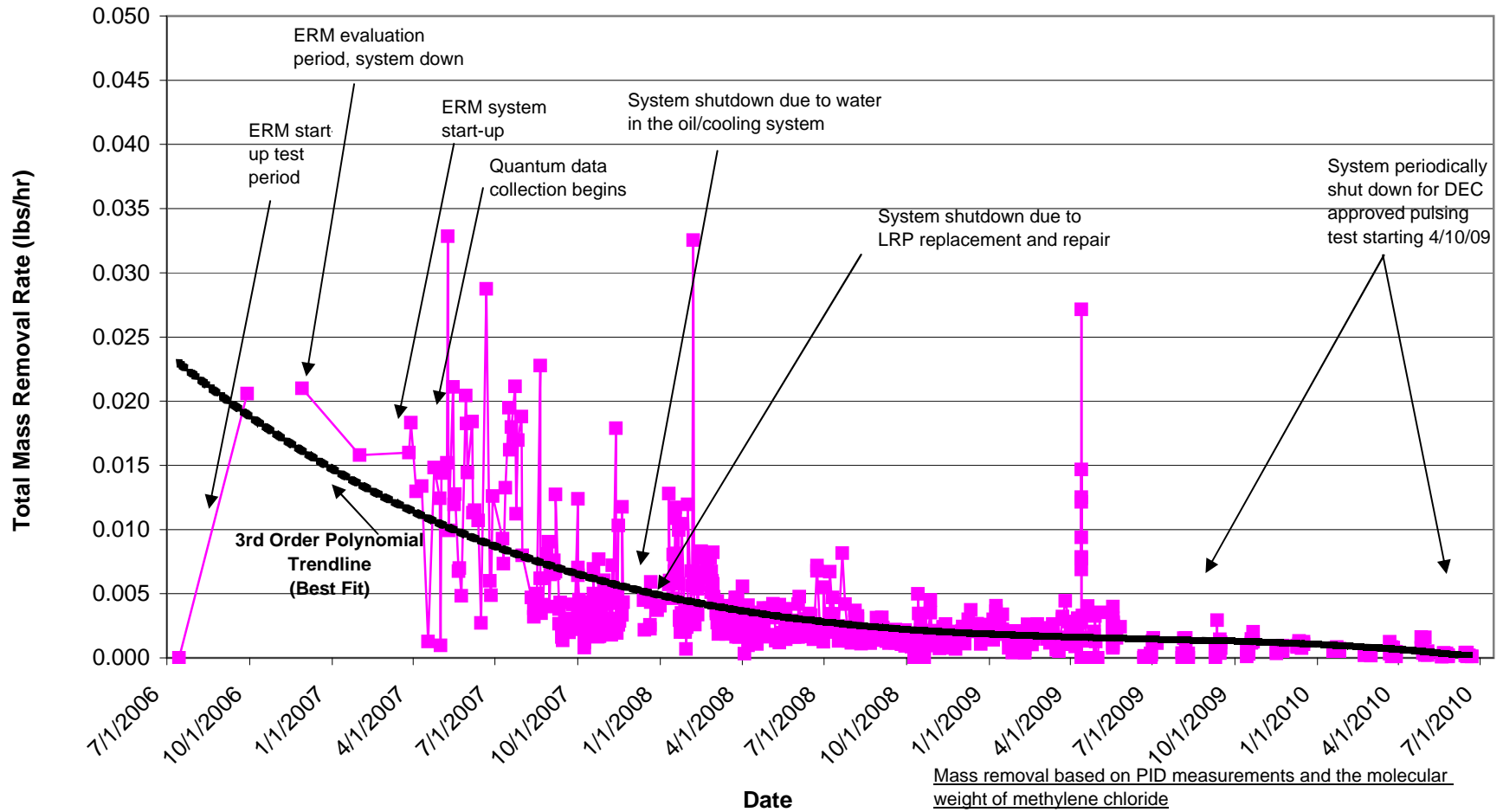


Figure 2A

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
June 2010

Total VOC Mass Removal Rate (Vapor & Ground Water Combined) Since April 2009

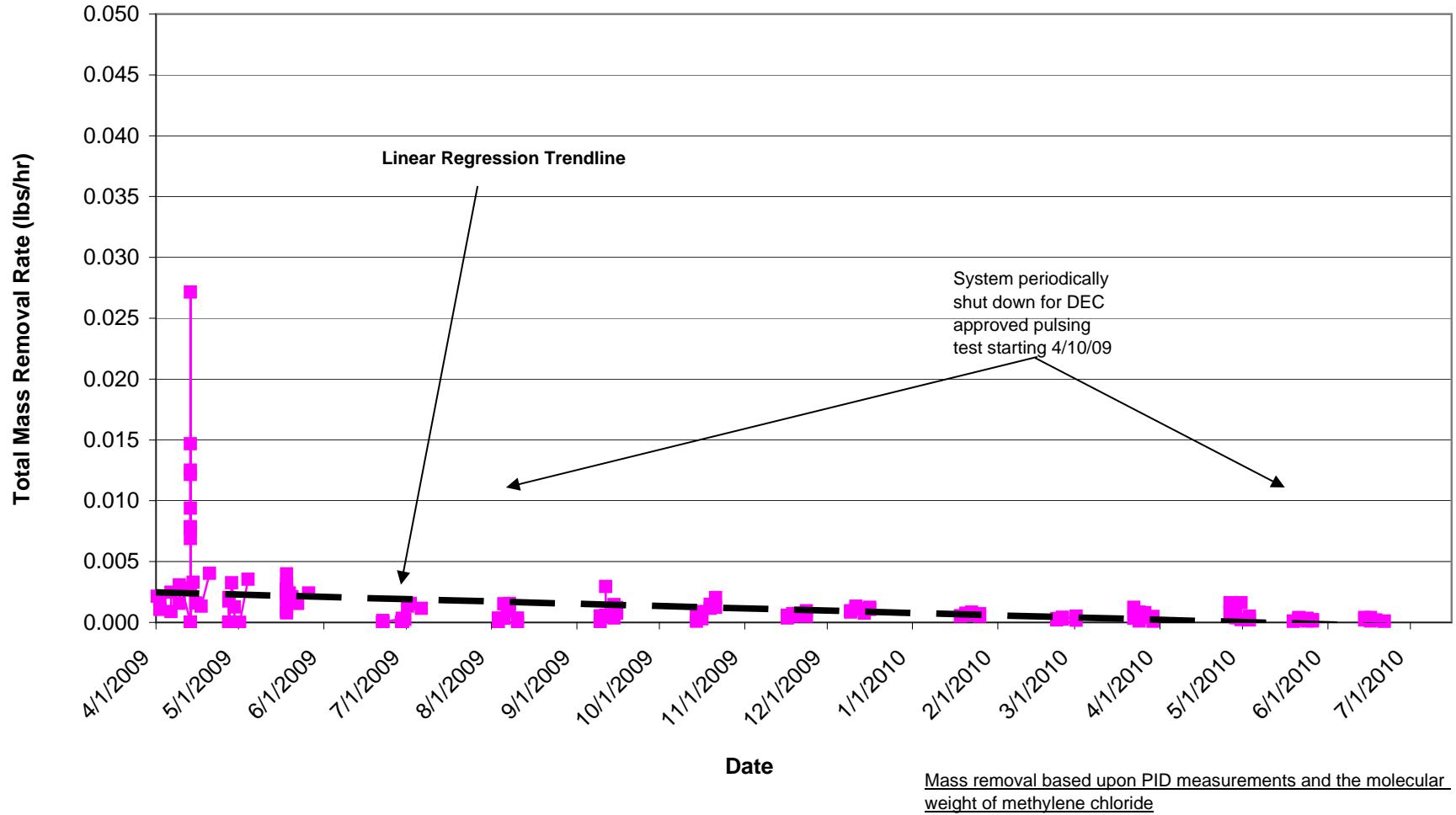


Figure 3

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
June 2010

Vapor Mass Removal Rate

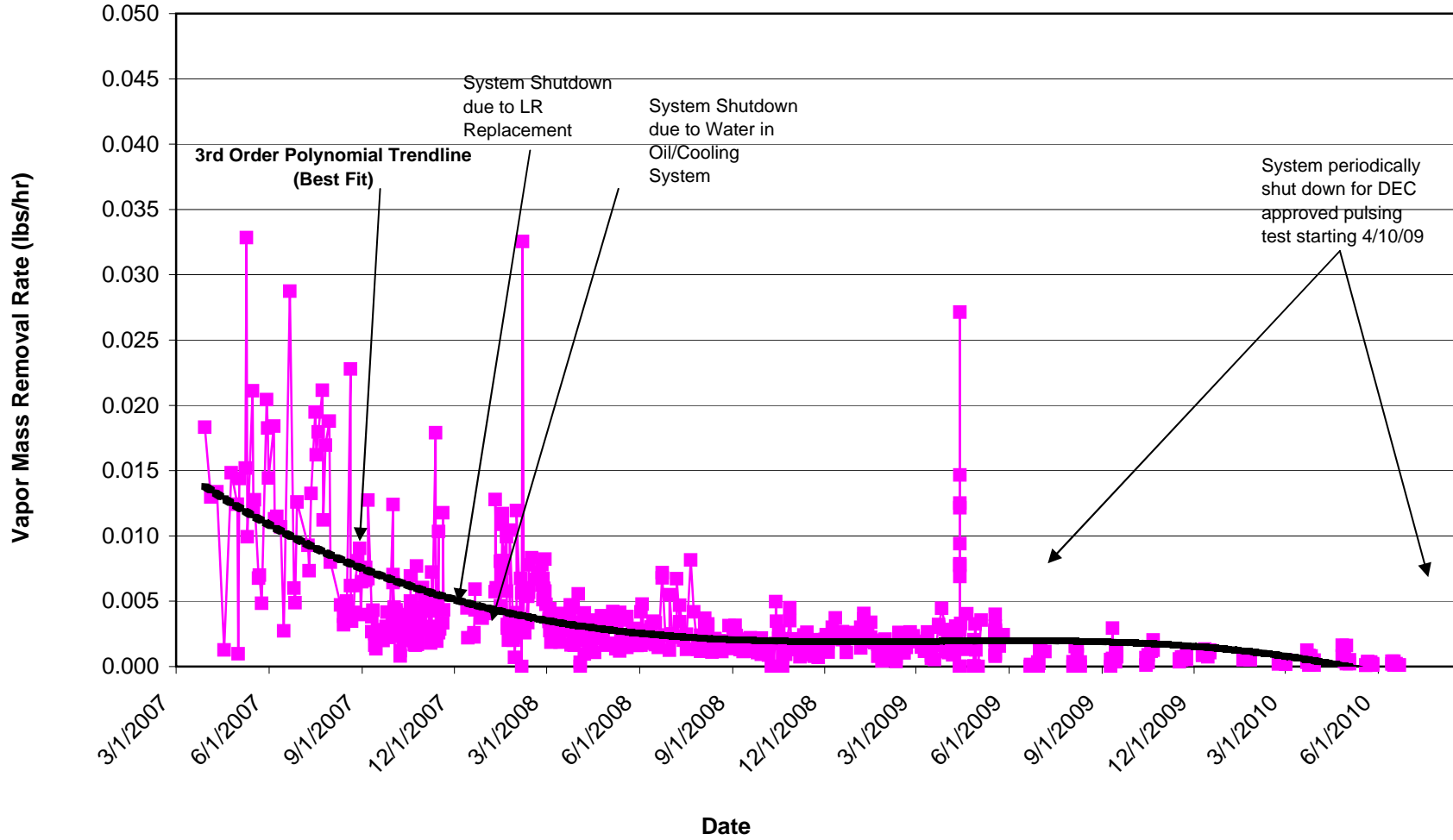


Figure 3A

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
June 2010

Vapor Mass Removal Rate Since April 2009

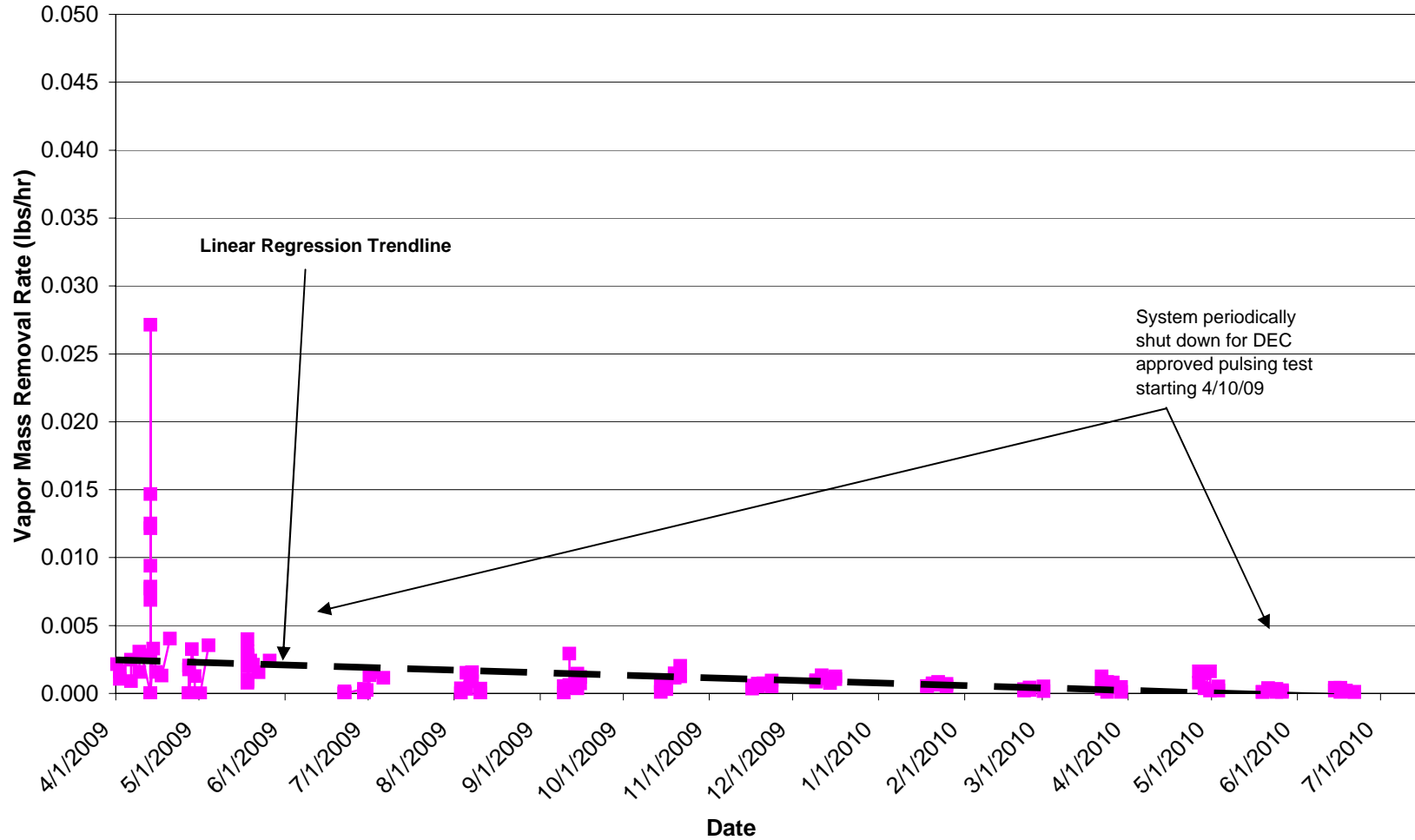


Figure 4

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
June 2010

System Vacuum

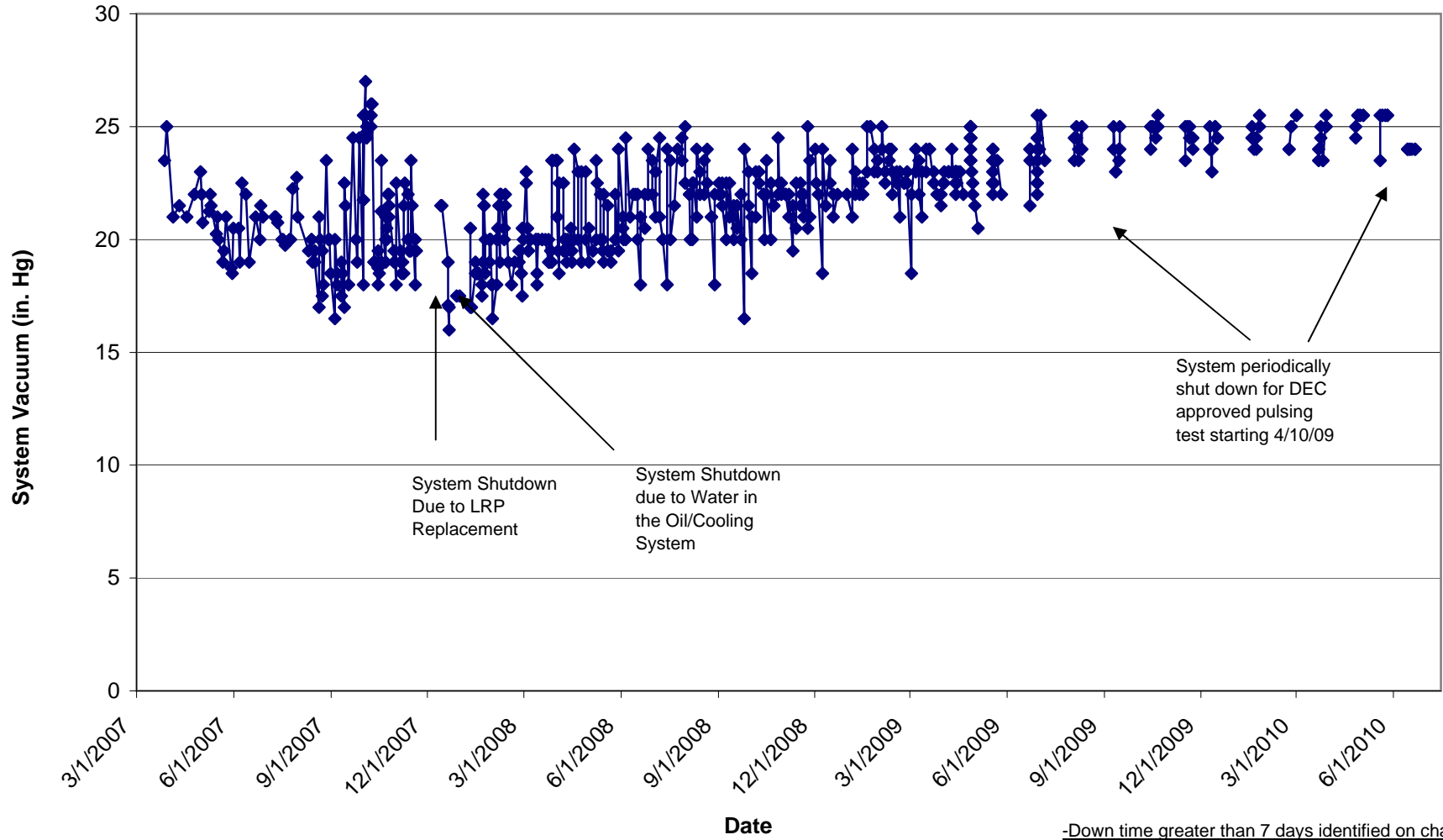
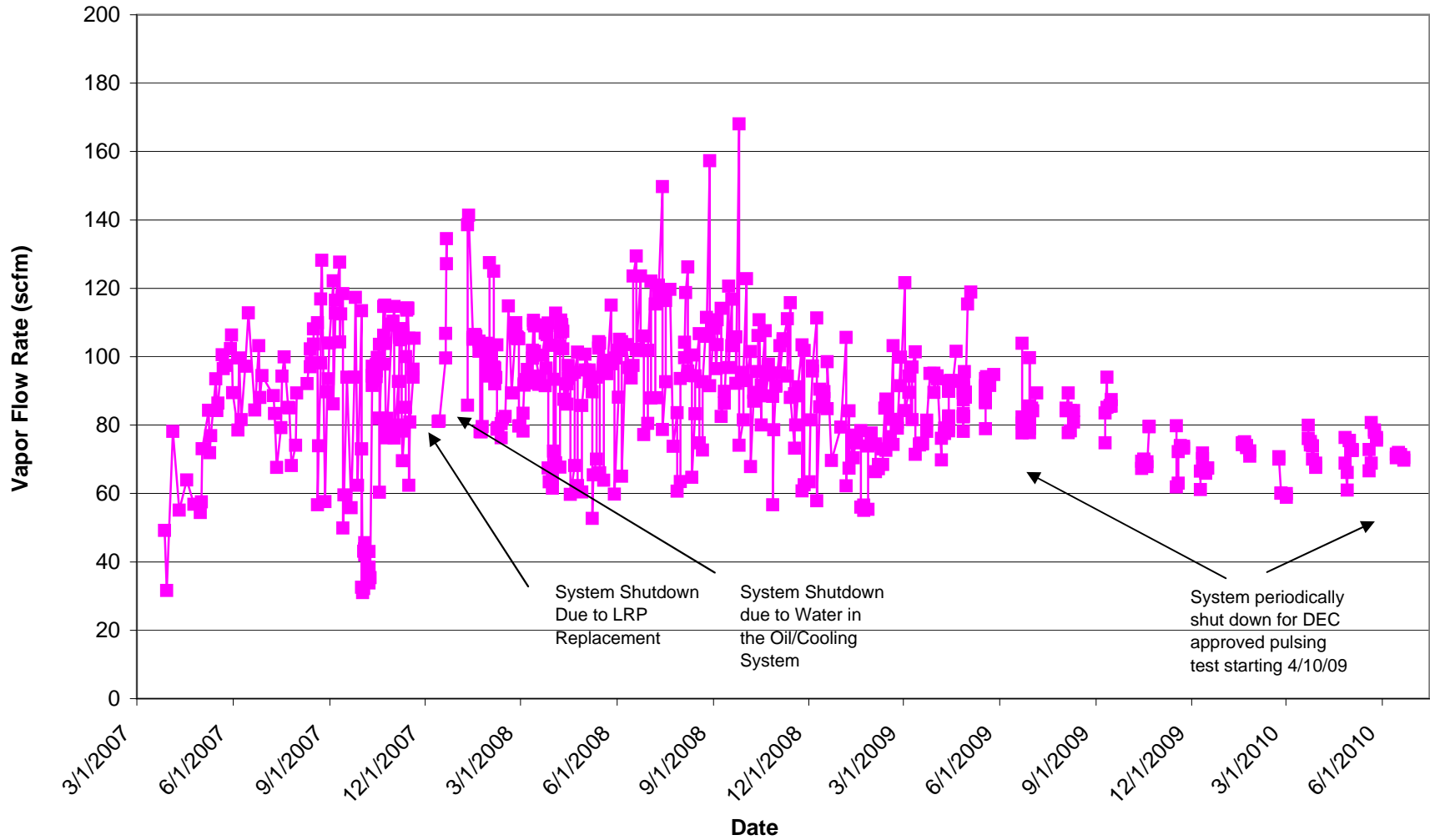


Figure 5

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
June 2010

System Vapor Flow Rate



-Down time greater than 7 days identified on chart

Figure 6

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
June 2010

Total MeCl Mass Removed (Ground Water)

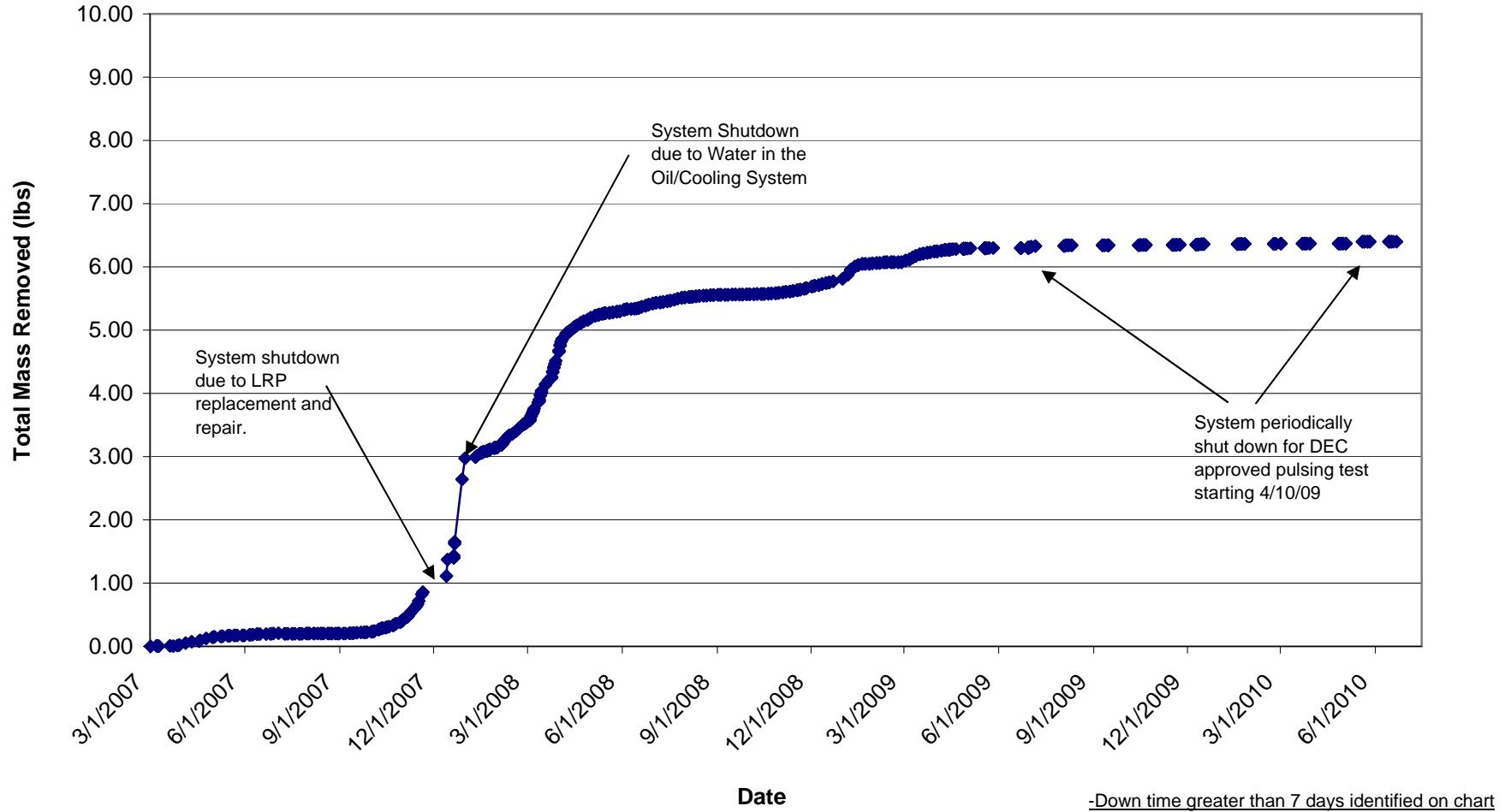


Figure 7

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
June 2010

MeCl Mass Removal Rate (Ground Water)

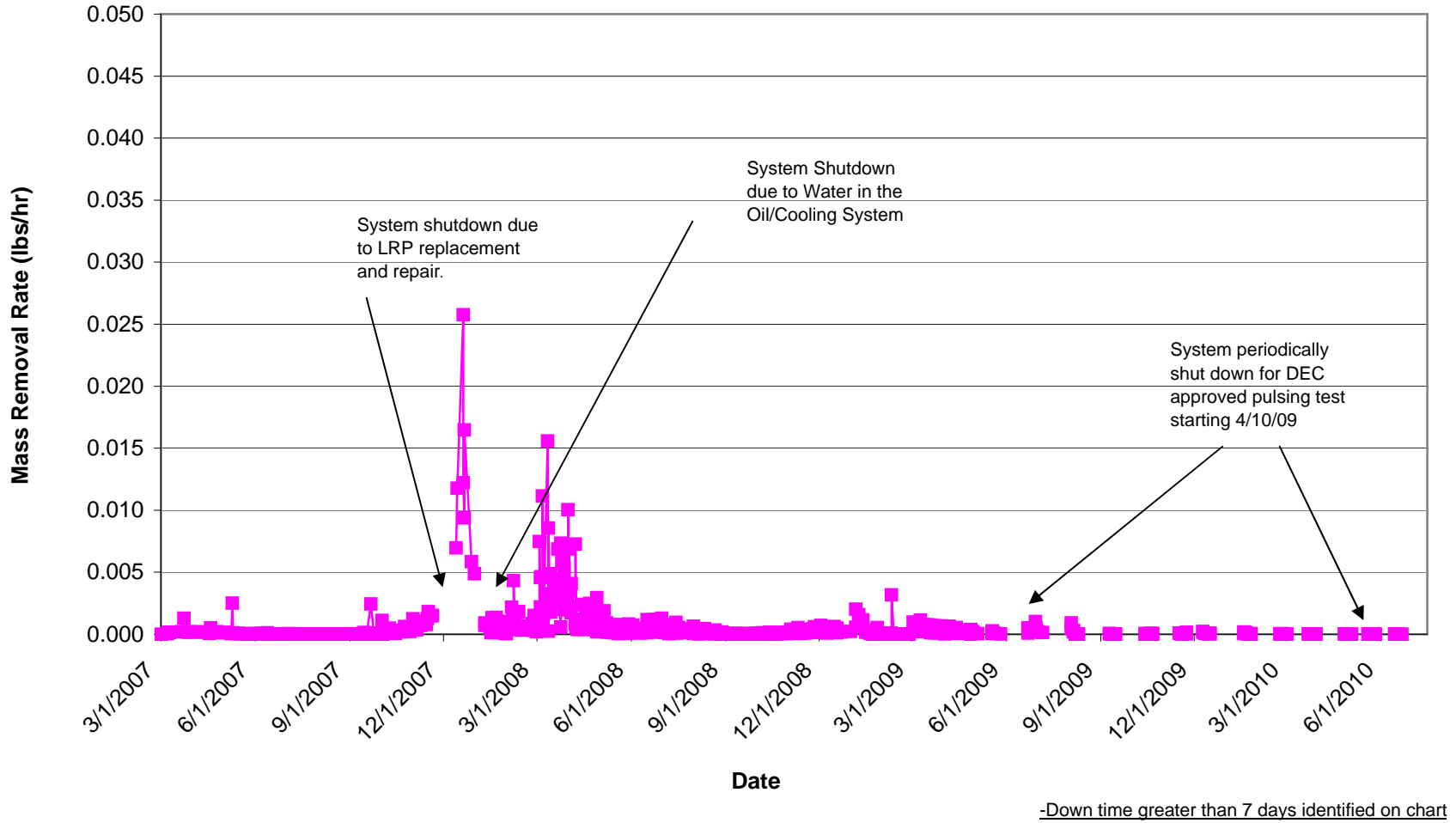
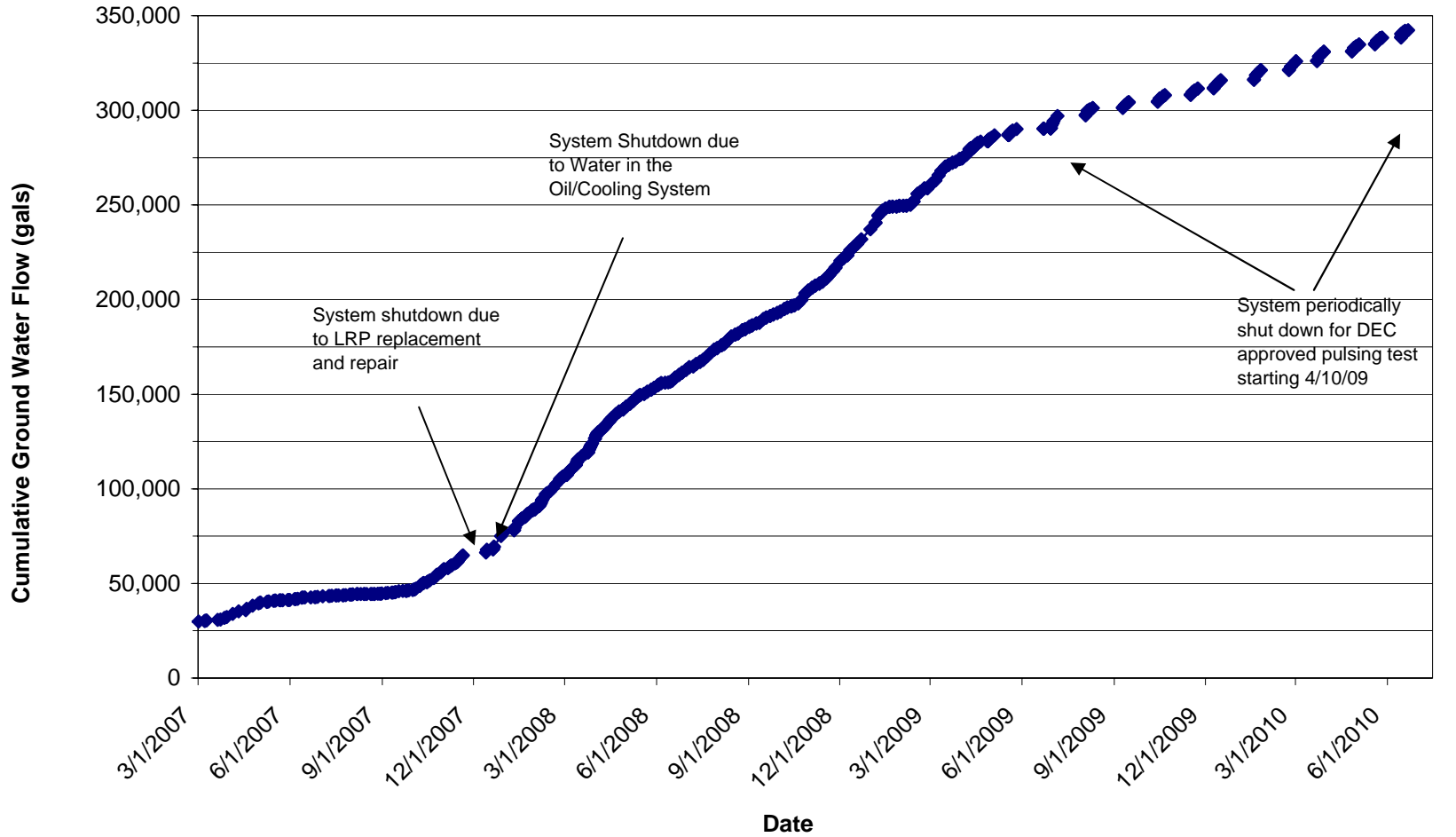


Figure 8

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
June 2010

Cumulative Ground Water Flow

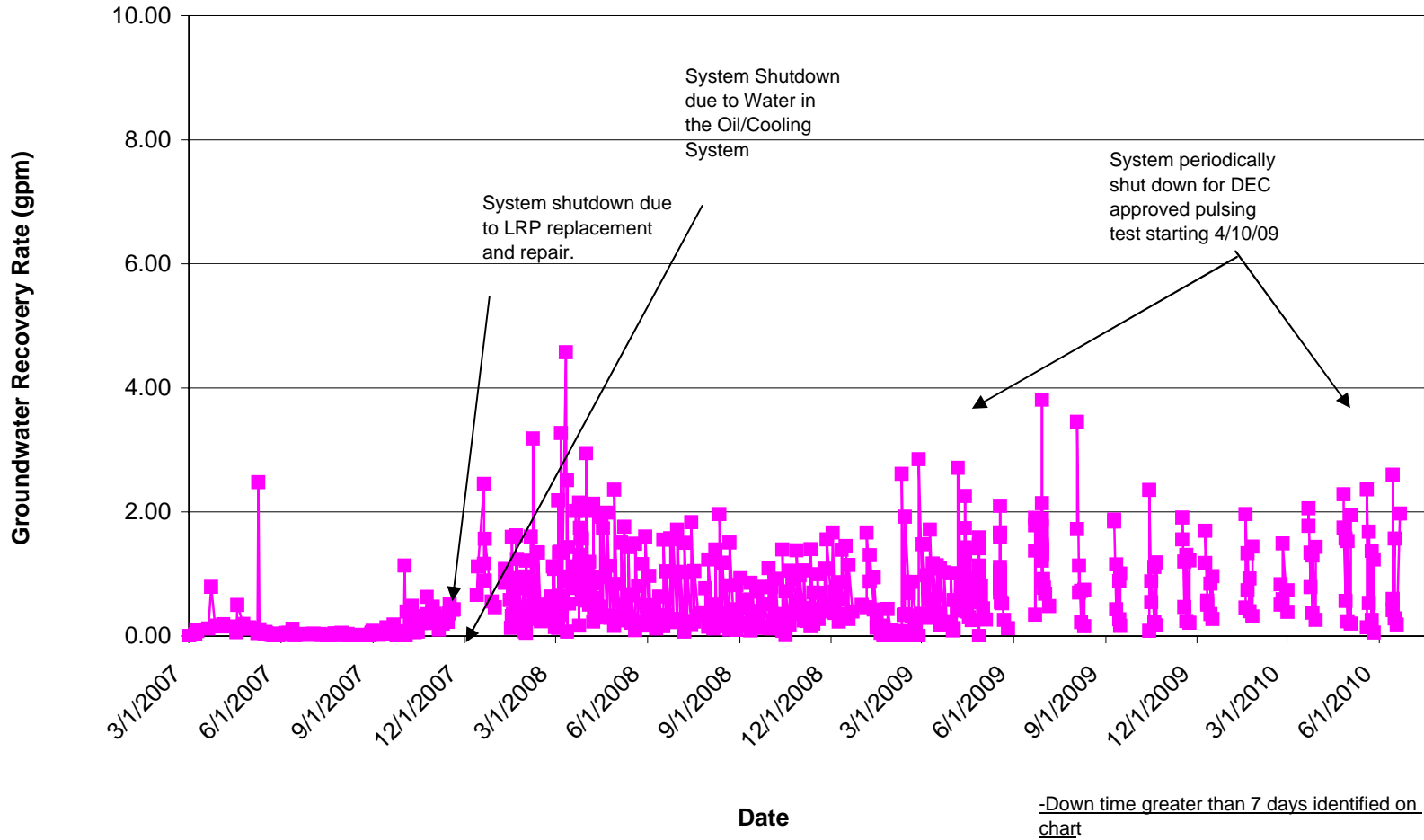


-Down time greater than 7 days identified on chart

Figure 9

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
June 2010

Ground Water Recovery Rate



Volatile Analysis Report for Water

Client: Quantum Management Group

Client Job Site: MPRS @ UCB
Jefferson Rd.
Client Job Number: N/A
Field Location: PreBT / Inf. 1,2,3 Comp.
Field ID Number: N/A
Sample Type: Water

Lab Project Number: 10-2403
Lab Sample Number: 8086
Date Sampled: 06/14/2010
Date Received: 06/14/2010
Date Analyzed: 06/18/2010

Liquid Influent

Compounds	Results in ug / L
Acetone	ND< 10.0
Amyl Acetate	ND< 25.0
Benzene	ND< 0.700
2-Butanone	ND< 10.0
Carbon disulfide	ND< 5.00
Chloroform	ND< 2.00
Chloromethane	ND< 2.00
cis-1,2-Dichloroethene	ND< 2.00
Ethyl acetate	ND< 25.0
Isopropyl acetate	ND< 25.0
Methylene chloride	ND< 5.00
m,p-Xylene	ND< 2.00
o-Xylene	ND< 2.00

ELAP Number 10958

Method: EPA 624

Data File: V76056.D

Comments: ND denotes Non Detect
ug / L = microgram per Liter

Signature: _____

Bruce Hoogesteger: Technical Director

Volatile Analysis Report for Water

Client: Quantum Management Group

Client Job Site: MPRS @ UCB
Jefferson Rd.
Client Job Number: N/A
Field Location: SP-302 / Eff. 1,2,3 Comp.
Field ID Number: N/A
Sample Type: Water

Lab Project Number: 10-2403
Lab Sample Number: 8087
Date Sampled: 06/14/2010
Date Received: 06/14/2010
Date Analyzed: 06/18/2010

Liquid Effluent

Compounds	Results in ug / L
Acetone	ND< 10.0
Amyl Acetate	ND< 25.0
Benzene	ND< 0.700
2-Butanone	ND< 10.0
Carbon disulfide	ND< 5.00
Chloroform	ND< 2.00
Chloromethane	ND< 2.00
cis-1,2-Dichloroethene	ND< 2.00
Ethyl acetate	ND< 25.0
Isopropyl acetate	ND< 25.0
Methylene chloride	ND< 5.00
m,p-Xylene	ND< 2.00
o-Xylene	ND< 2.00

ELAP Number 10958

Method: EPA 624

Data File: V76057.D

Comments: ND denotes Non Detect
ug / L = microgram per Liter

Signature: _____

Bruce Hoogesteger, Technical Director

Volatile Analysis Report for Air

Client: Quantum Management Group

Client Job Site: MPRS @ UCB Jefferson Rd **Lab Project Number:** 10-2403
Client Job Number: N/A **Lab Sample Number:** 8088
Field Location: SP-102 Tedlar Bag **Date Sampled:** 06/14/2010
Field ID Number: N/A **Date Received:** 06/14/2010
Sample Type: Air **Date Analyzed:** 06/21/2010

Vapor Influent

Compound	Results in PPBv	Results in ug / m3
Acetone	ND< 4,220	ND< 10,000
Benzene	ND< 627	ND< 2,000
2-Butanone	ND< 3,400	ND< 10,000
Carbon disulfide	ND< 643	ND< 2,000
Chloroform	ND< 414	ND< 2,000
Chloromethane	ND< 978	ND< 2,000
cis-1,2-Dichloroethene	ND< 509	ND< 2,000
Methylene chloride	ND< 1,460	ND< 5,000
m,p-Xylene	ND< 461	ND< 2,000
o-Xylene	ND< 461	ND< 2,000

ELAP Number 10958

Method: EPA 8260B
Modified for Tedlar Bag

Data File: V76085.D

Comments: ND denotes Non Detect
PPBv = Parts per Billion volume
ug / m3 - Microgram per cubic meter.

Signature: _____

Bruce Hoogesteger: Technical Director



May 25, 2010

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: First Quarter 2010 Environmental Effectiveness Monitoring Report
UCB Manufacturing Inc.
755 Jefferson Road Facility – Henrietta, New York
NYSDEC VCP Number: V00126-8

Dear Mr. MacLean:

On behalf of UCB Manufacturing Inc. (UCB), please find enclosed the Quarterly Environmental Effectiveness Monitoring Report for the above-referenced Site for the first quarter of 2010 covering the time period from January 1, 2010 through March 31, 2010. This report is being submitted in accordance with the requirements described in Section 6.2 of the Draft Operation, Maintenance & Monitoring (OM&M) Plan.

Between March 10 and 11, 2010, Kleinfelder East, Inc. completed quarterly liquid gauging and ground water sampling at the Site pursuant to Section 4.3 of the Draft Operations, Maintenance & Monitoring Plan (OM&M) Plan. Groundwater quality analytical results are summarized on Table 1. The Multi-Phase Remedial System (MPRS) continues to operate on a pulsed schedule of one week of operation every month.

If you require additional information or clarification, please contact the undersigned at (845) 567-6530 or Rick Bethel of Quantum Management Group, Inc. at (513) 314-7543.

Sincerely,
Kleinfelder East, Inc.

Alexander Wirth
Senior Project Geologist

Theodore Sikora
Project Geologist

Enclosure

Cc: Rick Bethel – Quantum Management Group, Inc.
John Lang – Quantum Management Group, Inc.
Michael Bogdan – Sanofi Aventis
Richard Ricci – Lowenstein Sandler PC
Jean McCreary – Nixon Peabody
Libby Ford – Nixon Peabody

755 Jefferson Road Site, Henrietta, NY
QUARTERLY ENVIRONMENTAL EFFECTIVENESS MONITORING REPORT

Site Address: Jefferson Road Facility	Regulatory Agency: NYSDEC – Region 8
755 Jefferson Road Henrietta, New York	Regulatory Contact: Gregory B. MacLean, P.E.
NYSDEC VCP No.: V00126-8	Consultant: Quantum Management Inc. (QMG), Kleinfelder East, Inc.
UCB Contact: Greg Light	Project Managers / Project Geologists: Rick Bethel (QMG), Alexander Wirth

Report Date: May 25, 2010.

Current Site Status: Active pharmaceutical manufacturing facility.

Monitoring Period: First quarter 2010 (January 1 through March 31).

Work Performed: Quarterly environmental effectiveness monitoring pursuant to Section 4.3 of the Draft OM&M plan submitted to New York State Department of Environmental Conservation (NYSDEC) in May 2007 and the addendum to the Draft Operations, Maintenance & Monitoring Plan (OM&M) Plan submitted in August 2007. Gauged 24 monitoring wells on March 10, 2010 and collected groundwater samples from 8 monitoring wells on March 10-11, 2010. The Multi Phase Recovery System (MPRS) was off at the time of gauging and sampling.

Groundwater Monitoring:

Number of Wells:	24
Gauging Frequency:	Quarterly
Sampling Frequency:	Quarterly (9 wells 1 st , 2 nd & 4 th quarter / 16 wells 3 rd quarter)
Overburden Groundwater Depth:	1.45 feet to 39.94 feet

The Multi Phase Remedial System (MPRS) was not operating during water level gauging and vacuum influence monitoring. All measurements were recorded and samples collected during non-operating conditions.

Shallow Groundwater Flow:	Variable
Intermediate Groundwater Flow:	Northeast
Deep Groundwater Flow:	Variable
Shallow Groundwater Gradient:	0.04 feet per foot
Intermediate Groundwater Gradient:	0.07 feet per foot
Deep Groundwater Gradient:	0.13 feet per foot

Site Geology:

The top of bedrock is located approximately 55 feet below grade throughout the Site. Surficial deposits at the Site generally consist of reddish-brown silt and clay with lesser amounts of brown fine/coarse grained sand and gray rounded gravel. Coarser material (particularly sand) is more abundant at depths of 0 to 6 feet below grade compared to deeper intervals. The relative permeability of the unconsolidated deposits above bedrock at the Site is considered low.

MPRS Effectiveness:

The MPRS continues to recover limited residual methylene chloride from areas of impacted soil and groundwater.

Since March 12, 2009 only three wells (MW-D8, RW-5 and RW-4) have been used as recovery wells as methylene chloride concentrations were highest in these wells based on previous sampling results. Recovery wells RW-4 (intermediate depth), RW-5 (intermediate depth) and MW-D8 (intermediate depth) exhibited a significant decrease in methylene chloride concentrations compared to previous quarterly sampling results. These results are comparable to other onsite wells. RW-4, RW-5 and MW-D8 will continue to be used as recovery wells during the continued pulsing operation throughout the second quarter of 2010 or until remedial closure is approved by NYSDEC.

The dissolved phase concentration has been reduced across the Site as depicted on Figures 7 through 20. The total volatile organic compound (VOC) vapor mass recovery rate steadily decreased since system start up to a steady state indicative of an asymptotic

condition that was reached during the last quarter of 2008 and which continues today. During the investigation phase, the quantity of subsurface methylene chloride was estimated to be 171 pounds. As of March 31, 2010, an estimated total of 138.5 pounds of methylene chloride has been recovered since system startup. For the period from January 1, 2010 to March 31, 2010, the system recovered an estimated total of 0.3 pounds of methylene chloride. The system operated for a total of 518 hours during this quarter. The average calculated recovery rate of methylene chloride over this quarter is 0.0006 pounds per hour. Overall mass recovery will continue to be monitored as a part of the effort to evaluate remedial effectiveness.

The VOC recovery rate of the MPRS has significantly diminished to an asymptotic level.

Comments:

The wells were sampled in accordance with the ground water sampling procedures outlined in Section 4.3 of the Draft OM&M Plan and the addendum to the Draft OM&M Plan submitted in August 2007. Wells were sampled in order of the lowest historical methylene chloride concentration to the highest historical methylene chloride concentration. The pumps were decontaminated between wells in accordance with the addendum to Section 1.5 of the Site Specific Health and Safety Plan presented as Attachment A to the OM&M Plan contained within the Draft Final Engineering Report.

Methylene chloride concentrations in groundwater collected from other site-related monitoring wells are within historical levels. Recovery well RW-4 had a concentration of 1.7J µg/L this quarter as compared to 240 µg/L last quarter. Recovery well MW-D8 had a concentration of 53 µg/L this quarter as compared to 27,000 µg/L last quarter. Recovery well RW-5 had a concentration of 1.4J this quarter as compared to 40 µg/L last quarter at the 23' interval, and 1.5J this quarter as compared to 32 at the 35' interval. It is important to note the significant drop in concentration for recovery wells RW-4, MW-D8, and RW-5. In previous quarterly sampling events, MW-D8 consistently had the highest concentrations of all the

wells onsite, while RW-4 and RW-5 also had concentrations above NYSDEC Standards.

Methylene chloride concentrations in groundwater showed slight to no variations in the other five wells. MW-D7, showed a decrease in concentration from 6.3 µg/L last quarter to 0.97J µg/L. The other four wells (MW-18, MW-D12, MW-D13 & RW-2) showed no change in concentration and stayed below detection limits.

Based on available data and consistently low recovery rates, asymptotic conditions have been reached. The existing remediation system is no longer exhibiting effective recovery of methylene chloride. A draft Methylene Chloride Area (MCA) closure plan which summarizes data and proposes a path towards closure of the MPRS has been submitted to NYSDEC. The document, as well as a companion draft petition for close out of the site-wide remedial project were discussed with the Department at a May 4, 2010 meeting. We are awaiting NYSDEC's formal comments on the recently submitted closure-related documents.

The NYSDEC-approved pulsing program continues on the cycle of operation of the MPRS one week of each month. The initial testing of the pulsing program was conducted from April 13 to July 6, 2009; a summary report was submitted on August 11, 2009. The system will continue to be pulsed on the above cycle until closure is granted by NYSDEC.

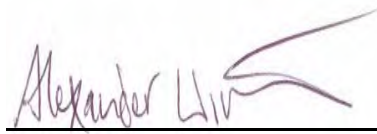
Attachments:

Table: Table 1 – Monitoring Well Gauging and Groundwater Analytical Data

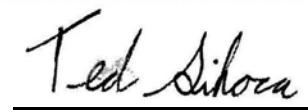
Figures: Figure 1 – Area Map
Figure 2 – Site Plan
Figure 3 – Groundwater Contour and Concentration Map – Shallow Wells
Figure 4 – Groundwater Contour and Concentration Map – Intermediate Wells
Figure 5 – Groundwater Contour and Concentration Map – Deep Wells

Figure 6 – Diagonal Well Potentiometric Conversion
Figures 7-20 – Dissolved Phase Concentration Trend Graphs

Appendices: Appendix A – Monthly Progress Reports – January, February and March 2010



Alexander Wirth 05/25/10
Senior Project Geologist Date



Theodore Sikora 05/25/10
Project Geologist Date

TABLE

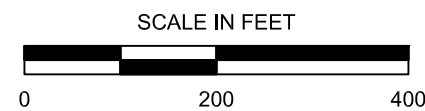
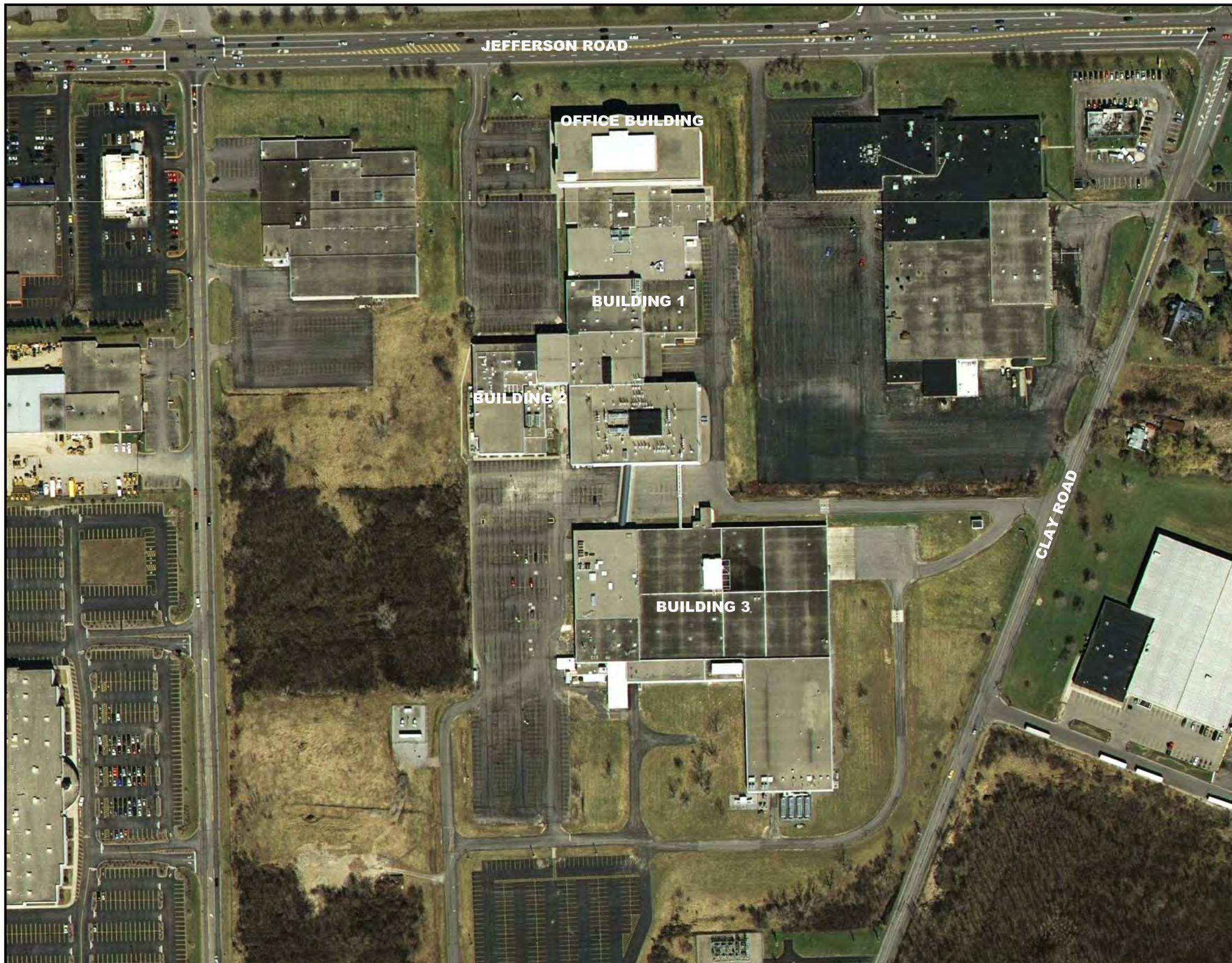
**Table 1
MONITORING WELL GAUGING AND GROUNDWATER ANALYTICAL DATA**

UCB Facility
755 Jefferson Road
Rochester, New York
June 18, 2007 through March 11, 2010

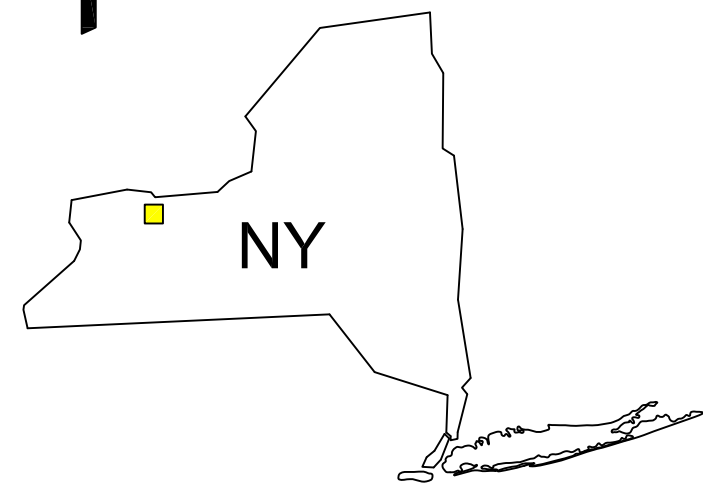
Sample ID	Date	TOC Elevation	Depth to Water	Corrected Water Table Elevation	Acetone		Methyl Ethyl Ketone	Dichloro- difluoromethane	cis-1,2- Dichloroethene	Ethyl acetate	Isopropyl acetate	n-Amyl Acetate	Total Xylenes	Benzene	Chloroform	Chloromethane	1,1- Dichloroethylene	trans-1,2- Dichloroethene	Carbon Disulfide	Methylene chloride
					\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$
NYSDEC Standards																				
					50	50	2.4 J	5	0.88 J	-	-	-	5	1	7	5	5	50	50	5
RW-5 (Recovery well, gauge & sample)	8/26/2003	NG	NG	NG	BRL	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	0.54 J	BRL	NA	120
	9/12/2005	NG	NG	NG	BRL	NA	NA	NA	NA	NA	NA	NA	BRL	NA	NA	NA	NA	NA	NA	BRL
	2/23/2007	NG	NG	NG	BRL	NA	NA	NA	BRL	BRL	BRL	NA	BRL	BRL	BRL	BRL	NA	NA	NA	BRL
	6/20/2007	547.27	22.66	524.61	<25	<25	<5.0	<5.0	<5.0	<5.0	NA	<15	<5.0	<5.0	8.3	<5.0	<5.0	NA	45,000 D	
	9/20/2007	547.27	28.97	518.30	<250	<250	NA	<50	<50	<50	NA	<150	<50	<50	<50	NA	NA	NA	1,000	
	12/18/2007	547.27	3.05	544.22	<250	<250	<50	<50	<50	<50	<50	<150	<50	<50	<50	<50	<50	<50	<50	770
	3/17/2008	547.27	14.13	533.28	380	<250	<50	<50	<50	<50	<50	<150	<50	<50	<50	<50	<50	<50	<50	530
	6/4/2008	547.27	46.08	514.69	<250	<250	<50	<50	<50	<50	<50	<150	<50	<50	<50	<50	<50	<50	<50	410
	9/10/2008	547.27	41.88	517.80	<12,000	<2,500	<2,500	<2,500	<2,500	<2,500	<2,500	<1,500	<2,500	<2,500	<2,500	<2,500	<2,500	<2,500	<2,500	25,000
	12/17/2008	547.27	9.99	540.21	<2,500	<2,500	<500	<500	<500	<500	<500	<1,500	<500	<500	<500	<500	<500	<500	<500	6,500
35	3/23/2009	547.27	46.36	515.20	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<1.1	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	2.2 J.B
	6/17/2009	547.27	42.89	516.94	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<1.1	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	2.2 J.B
	9/17/2009	547.27	44.76	515.62	<120	<120	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	630
	12/17/2009	547.27	13.25	537.90	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	40
	3/10/2010	547.27	4.50	544.09	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	1.4 J
27	3/23/2009	547.27	45.36	515.20	<2500	<2500	<500	<500	<500	<500	<500	<1,000	<500	<500	<500	<500	<500	<500	<500	8,900 D
	6/17/2009	547.27	42.89	516.94	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	0.94 J.B
	9/17/2009	547.27	44.76	515.62	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	12/17/2009	547.27	13.25	537.90	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	32
	3/10/2010	547.27	4.50	544.09	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	1.5 J
RW-6 (Recovery well, gauge & sample)	8/26/2003	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	140,000
	9/9/2005	NG	NG	NG	BRL	NA	NA	NA	NA	NA	NA	NA	NA	BRL	NA	NA	NA	NA	NA	3,300 D
	2/22/2007	NG	NG	NG	BRL	BRL	BRL	BRL	BRL	BRL	BRL	NA	BRL	BRL	BRL	BRL	NA	NA	NA	BRL
	6/20/2007	547.89	12.71	535.18	<25	<25	<5.0	<5.0	<5.0	<5.0	NA	<15	<5.0	<5.0	<5.0	<5.0	<5.0	NA	<5.0	
	9/20/2007	547.89	17.40	530.49	<25	<25	NA	<5.0	<5.0	<5.0	NA	<15	<5.0	<5.0	<5.0	<5.0	NA	NA	NA	<5.0
	12/19/2007	547.89	1.62	544.71	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<15	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
	3/18/2008	547.89	4.58	543.81	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<15	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
	6/4/2008	547.89	36.96	514.96	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<15	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
	9/11/2008	547.89	37.58	514.41	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<15	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
	12/17/2008	547.89	36.38	512.80	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
RW-6 (Recovery well, gauge & sample)	6/17/2009	547.89	7.91	540.84	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	9/17/2009	547.89	33.77	517.80	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	12/17/2009	547.89	9.91	538.06	<25	<25	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
	3/23/2009	547.89	11.76	537.41	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	3/10/2010	547.89	4.51	543.87	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS

Notes:
 <1.0 - Not detected at or above the laboratory reporting limit shown.
 * - Sample results are from a pumping test.
 All units reported in µg/L - micrograms per liter (parts per billion).
 All wells gauged on September 17, 2005.
 B - analyte found in the associated blank, as well as in the sample.
Bolded - Detection above laboratory reporting limits.
 BRL - Below laboratory reporting limits.
 BTEX - benzene, toluene, ethylbenzene, and total xylenes.
 Corrected Water Table Elevation - Determined by trigonometry for wells MW-D9, MW-D11 to MW-D13, and RW-4 to RW-6.
 D - Surrogate recovery unresponsive due to dilution.
 DRY - Insufficient water to gauge or sample.
 J - The reported concentration is estimated (the result is less than the sample quantitation limit but greater than zero).
 NA - not analyzed.
 NG - not gauged/or data not available.
 NS - not sampled.
 NYSDEC Standards and Guidance Values - New York State Department of Environmental Conservation Technical and Operational Guidance Series (TOGS) 1.1.1, Ambient Water Quality Standards and Guidance Values, June 1998 and Addendum April 2000.
 Shading - Reported concentration detected above the applicable standard(s) or guidance value(s).

FIGURES



LATITUDE: 43° 05' 03" N
 LONGITUDE: 77° 37' 19" W



SITE LOCATION

NEWBURGH, NY

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REFERENCES:

1. AERIAL IMAGES "w_14041124_12_09000_col_20051.sid" AND "w_14041126_12_09000_col_20051.sid" © NYS CLEARING HOUSE.
2. KLEINFELDER FIELD RESEARCH.

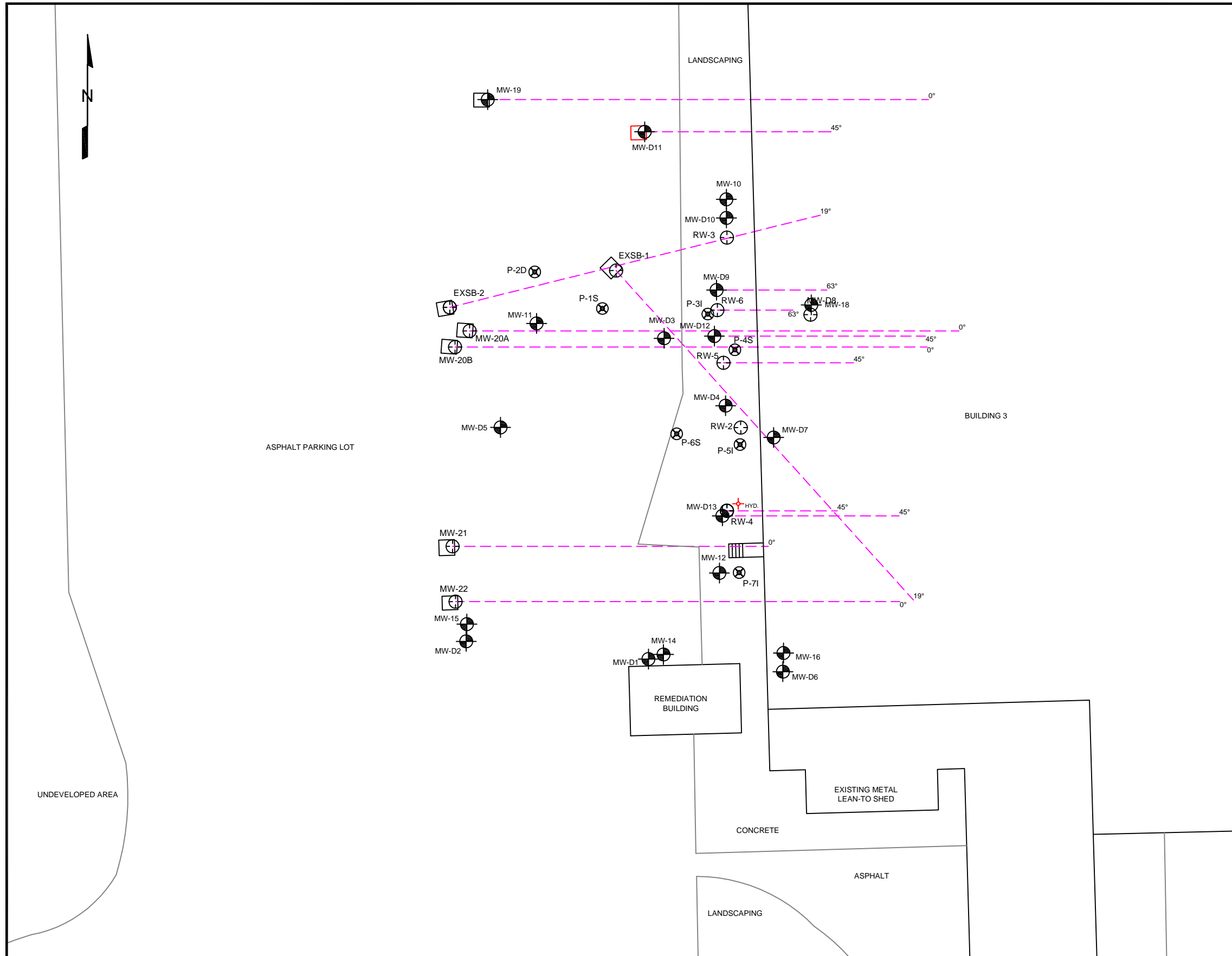


PROJECT NO.	109794
DRAWN:	04/19/10
DRAWN BY:	CTH
CHECKED BY:	TS
FILE NAME:	SANOFISSURJAN10.dwg

AREA MAP	
UCB FACILITY NYSDEC VCP# V00126-8 755 JEFFERSON ROAD ROCHESTER	
MONROE COUNTY	NEW YORK

FIGURE

1



LEGEND

- MONITORING WELL
- RECOVERY WELL
- PIEZOMETER
- VAULT
- FIRE HYDRANT
- ANGLED WELL (ANGLE MEASURED FROM GROUND SURFACE)



NEWBURGH, NY

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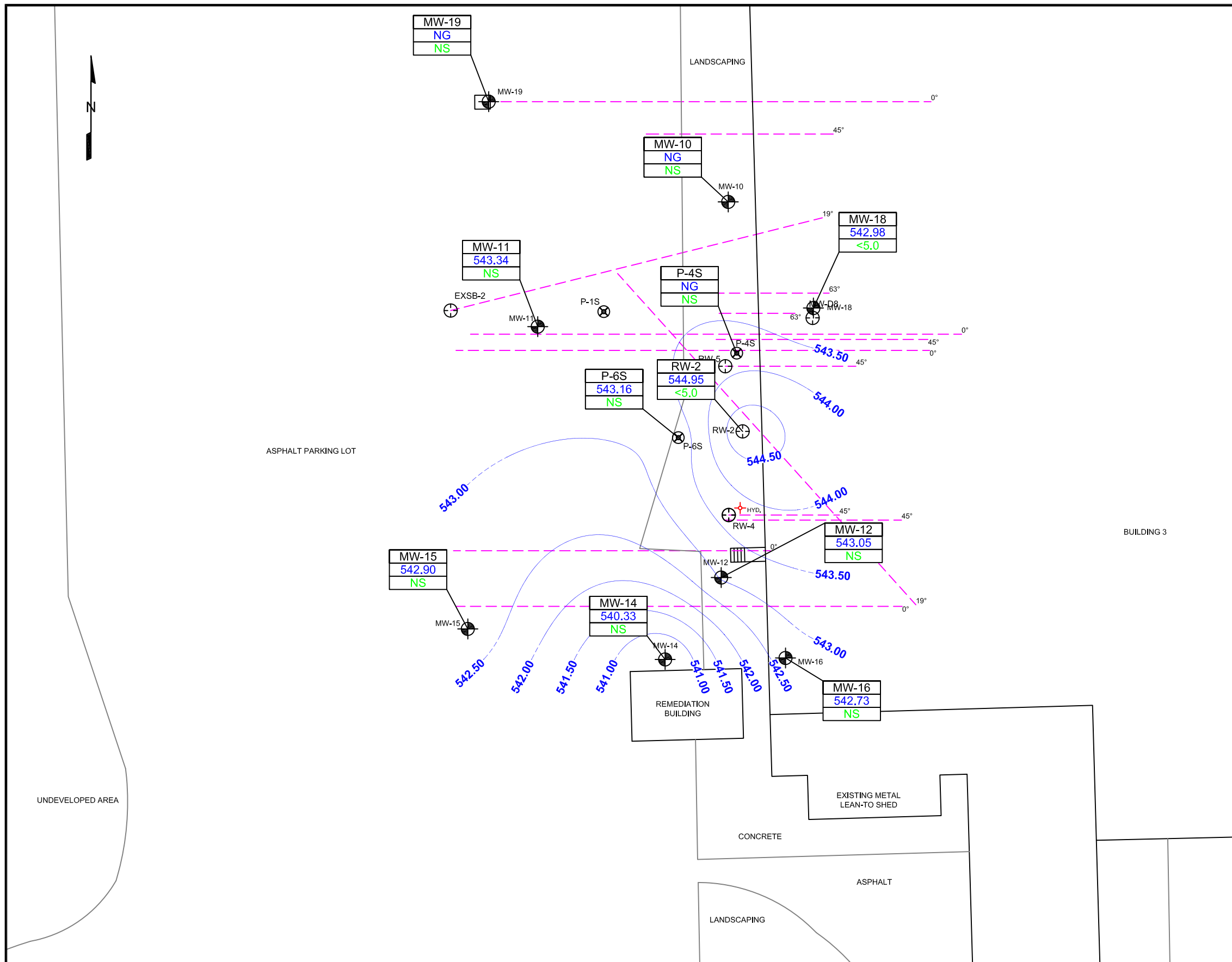
- REFERENCES:**
- "WELL LOCATION MAP" PREPARED BY ERM, DATED SEPTEMBER, 2006.
 - KLEINFELDER FIELD RESEARCH.



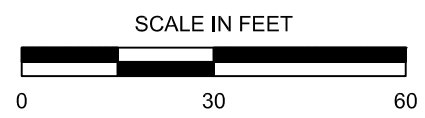
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DRAWN:	05/06/10
DRAWN BY:	KAW
CHECKED BY:	TS
FILE NAME:	

SITE PLAN
UCB FACILITY NYSDEC VCP# V00126-8 755 JEFFERSON ROAD

FIGURE
2



LEGEND	
	MONITORING WELL
	RECOVERY WELL
	PIEZOMETER
	FIRE HYDRANT
	ANGLED WELL (ANGLE MEASURED FROM GROUND SURFACE)
	MONITORING WELL IDENTIFICATION GROUNDWATER ELEVATION (FEET) METHYLENE CHLORIDE (µg/L)
	WATER-TABLE CONTOUR (0.5 FOOT INTERVAL) (DASHED WHERE INFERRED)
µg/L	MICROGRAMS PER LITER
NG	NOT GAUGED
NS	NOT SAMPLED



NOTES:
 1. GROUNDWATER MONITORING WELLS WERE GAUGED AND SAMPLED ON MARCH 10-11, 2010.
 2. SYSTEM WAS NOT OPERATIONAL AT THE TIME OF GAUGING AND SAMPLING.

REFERENCES:
 1. "WELL LOCATION MAP" PREPARED BY ERM, DATED SEPTEMBER, 2006.
 2. KLEINFELDER FIELD RESEARCH.



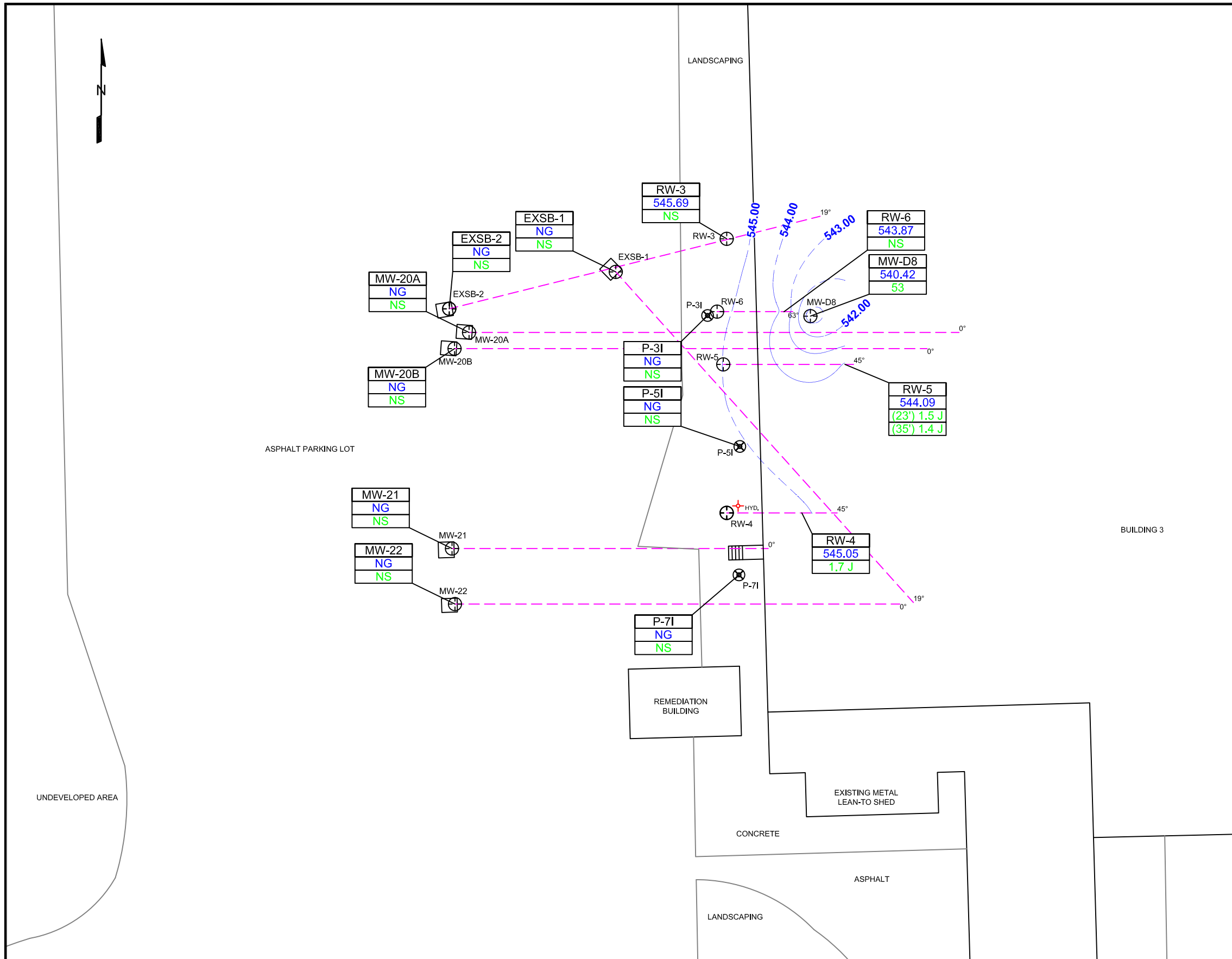
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DRAWN:	05/12/10
DRAWN BY:	KAW
CHECKED BY:	TS
FILE NAME:	

GROUNDWATER CONTOUR AND CONCENTRATION MAP SHALLOW WELLS

UCB FACILITY
 NYSDEC VCP# V00126-8
 755 JEFFERSON ROAD

FIGURE
3

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LEGEND

- RECOVERY WELL
- PIEZOMETER
- VAULT
- FIRE HYDRANT
- ANGLED WELL (ANGLE MEASURED FROM GROUND SURFACE)
- | | | |
|------|--------|----|
| RW-6 | 543.87 | NS |
|------|--------|----|

 MONITORING WELL IDENTIFICATION
GROUNDWATER ELEVATION (FEET)
METHYLENE CHLORIDE (µg/L)
- WATER-TABLE CONTOUR (1 FEET INTERVAL)
(DASHED WHERE INFERRED)
- µg/L MICROGRAMS PER LITER
- NG NOT GAUGED
- NS NOT SAMPLED

SCALE IN FEET

- NOTES:
- GROUNDWATER MONITORING WELLS WERE GAUGED AND SAMPLED ON MARCH 10-11, 2010.
 - SYSTEM WAS NOT OPERATIONAL AT THE TIME OF GAUGING AND SAMPLING.

- REFERENCES:
- "WELL LOCATION MAP" PREPARED BY ERM, DATED SEPTEMBER, 2006.
 - KLEINFELDER FIELD RESEARCH.

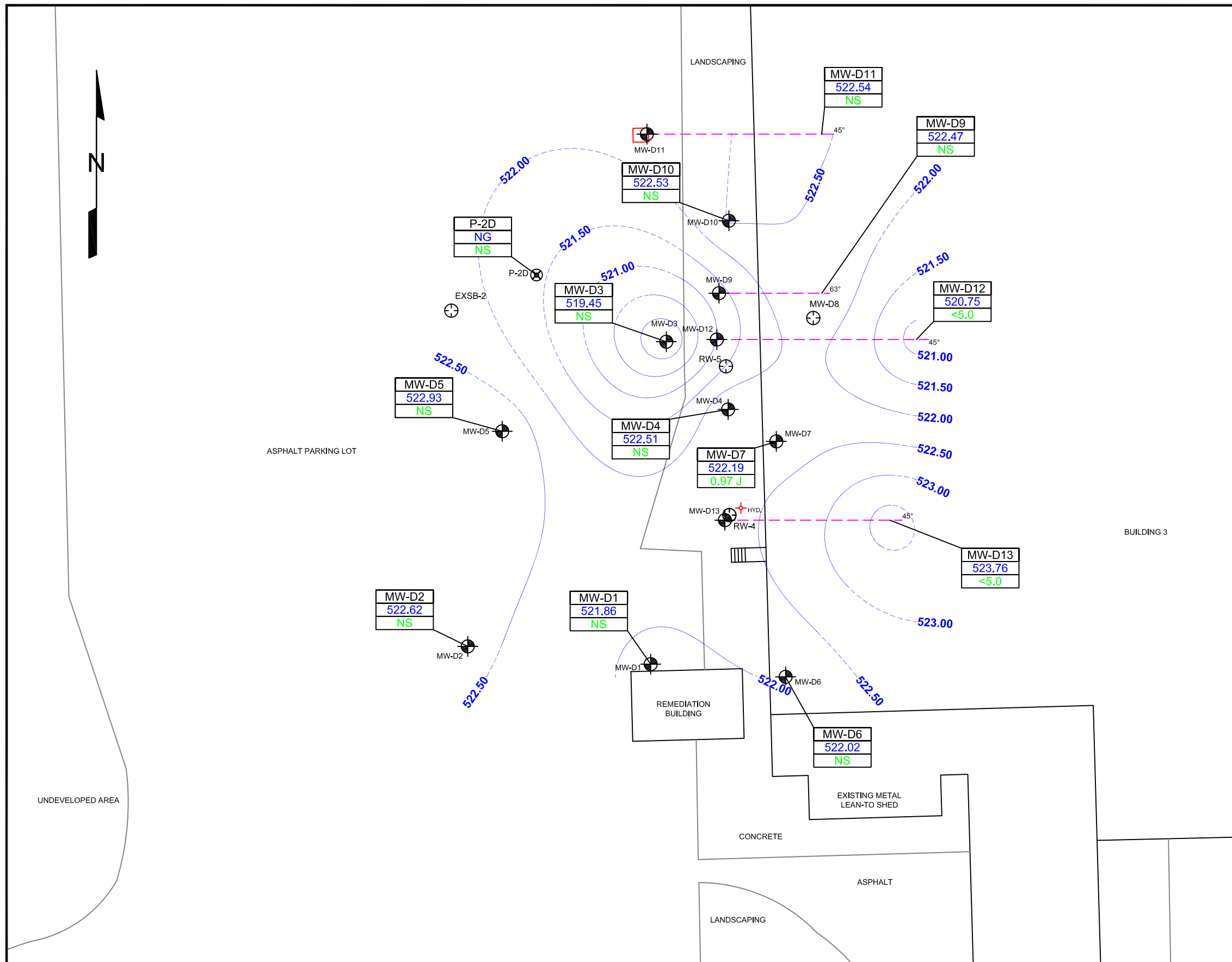
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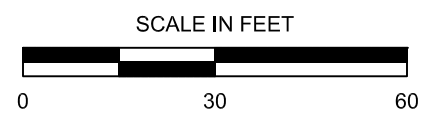
PROJECT NO.	109794
DRAWN:	05/11/10
DRAWN BY:	KAW
CHECKED BY:	TS
FILE NAME:	

GROUNDWATER CONTOUR AND CONCENTRATION MAP INTERMEDIATE WELLS

UCB FACILITY
NYSDEC VCP# V00126-8
755 JEFFERSON ROAD



LEGEND				
	MONITORING WELL			
	RECOVERY WELL			
	PIEZOMETER			
	FIRE HYDRANT			
	ANGLED WELL (ANGLE MEASURED FROM GROUND SURFACE)			
<table border="1"><tr><td>MW-D4</td></tr><tr><td>522.51</td></tr><tr><td>NS</td></tr></table>	MW-D4	522.51	NS	MONITORING WELL IDENTIFICATION GROUNDWATER ELEVATION (FEET) METHYLENE CHLORIDE (µg/L)
MW-D4				
522.51				
NS				
	WATER-TABLE CONTOUR (0.5 FOOT INTERVAL) (DASHED WHERE INFERRED)			
µg/L	MICROGRAMS PER LITER			
NG	NOT GAUGED			
NS	NOT SAMPLED			



- NOTES:
- GROUNDWATER MONITORING WELLS WERE GAUGED AND SAMPLED ON MARCH 10-11, 2010.
 - SYSTEM WAS NOT OPERATIONAL AT THE TIME OF GAUGING AND SAMPLING.
- REFERENCES:
- "WELL LOCATION MAP" PREPARED BY ERM, DATED SEPTEMBER, 2006.
 - KLEINFELDER FIELD RESEARCH.



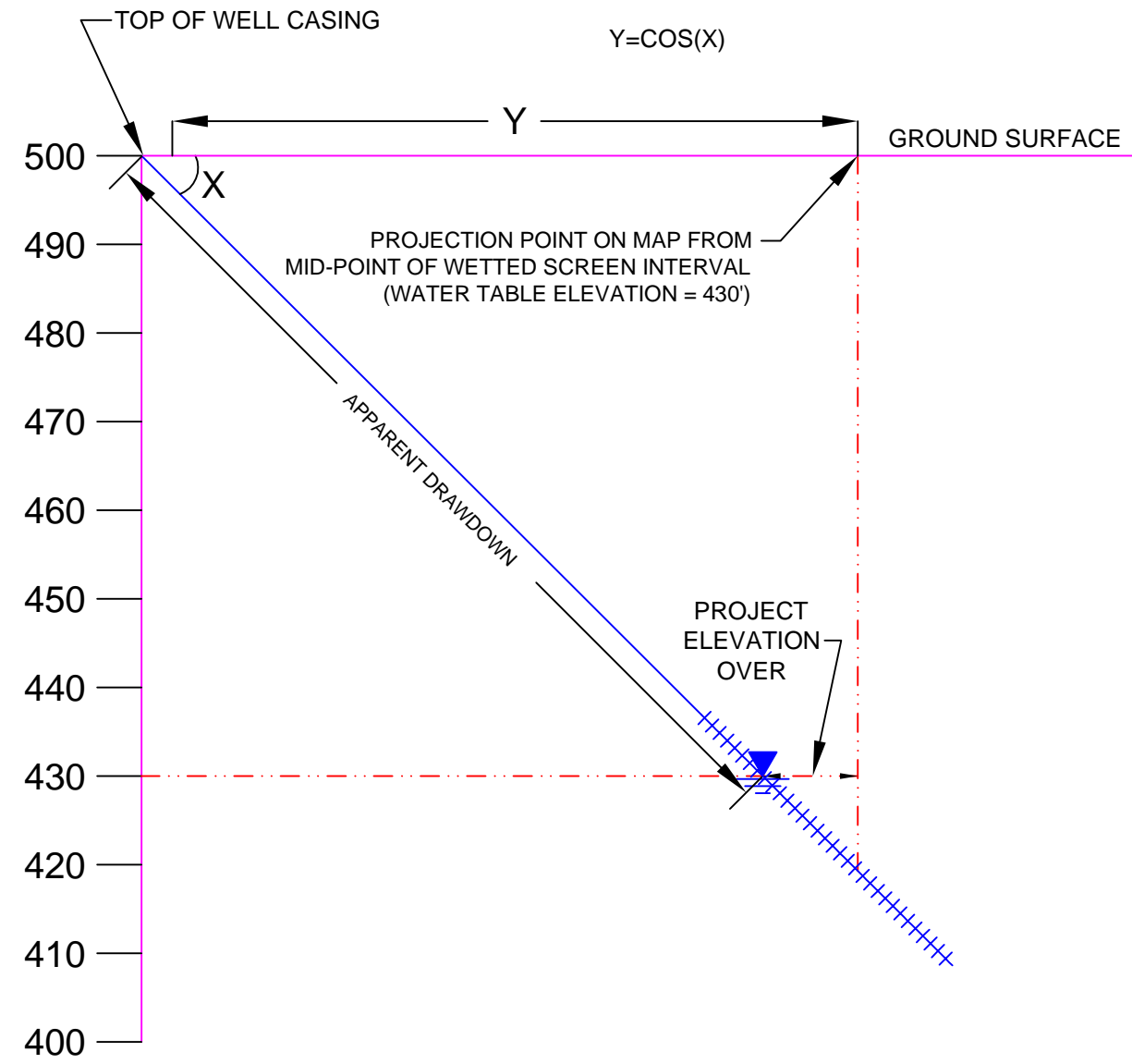
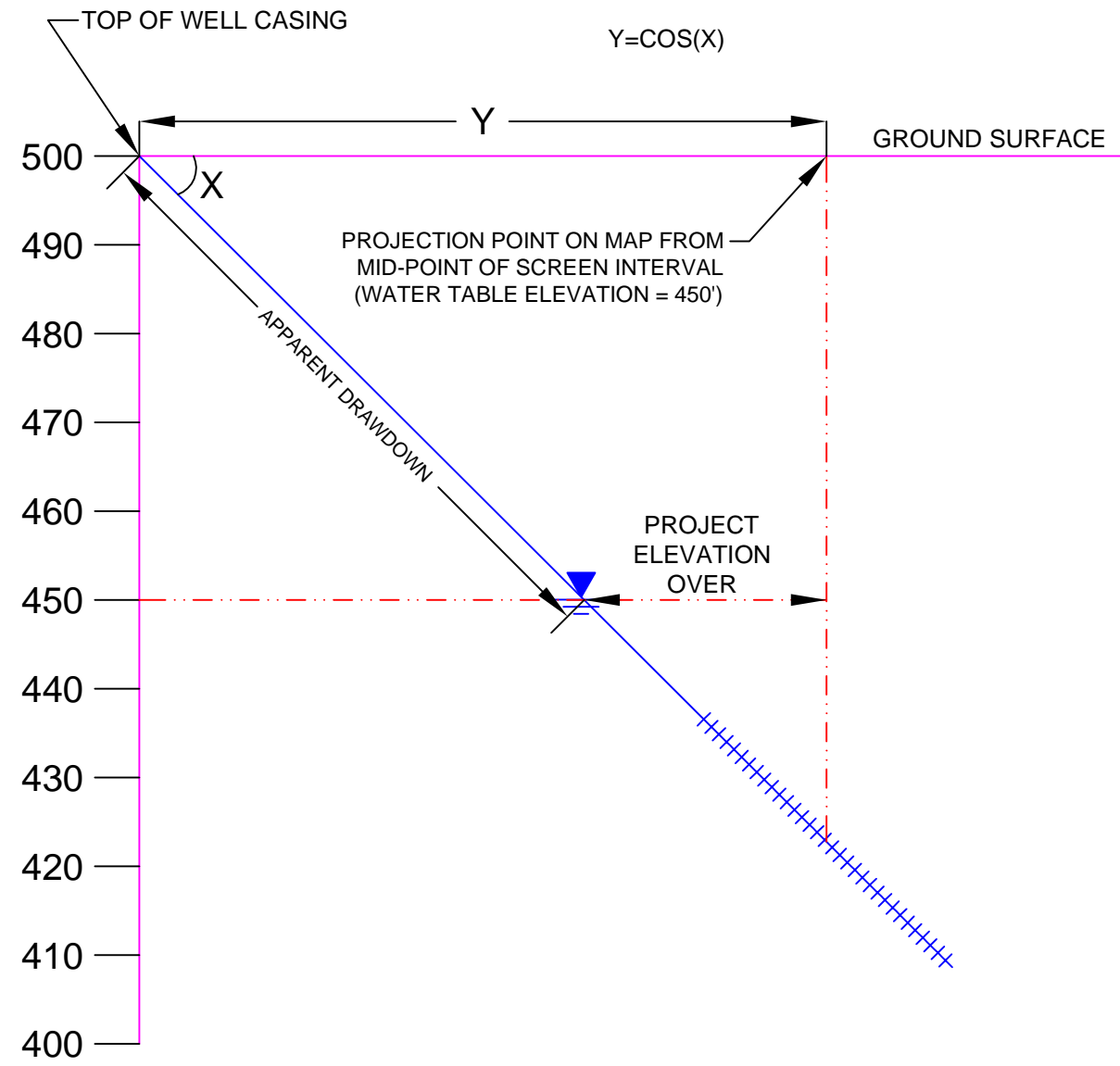
PROJECT NO.	109794
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DRAWN BY:	KAW
CHECKED BY:	TS
FILE NAME:	

GROUNDWATER CONTOUR AND CONCENTRATION MAP DEEP WELLS

UCB FACILITY
NYSDEC VCP# V00126-8
755 JEFFERSON ROAD

FIGURE
5

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- REFERENCES:
- "WELL LOCATION MAP" PREPARED BY ERM, DATED SEPTEMBER, 2006.
 - KLEINFELDER FIELD RESEARCH.

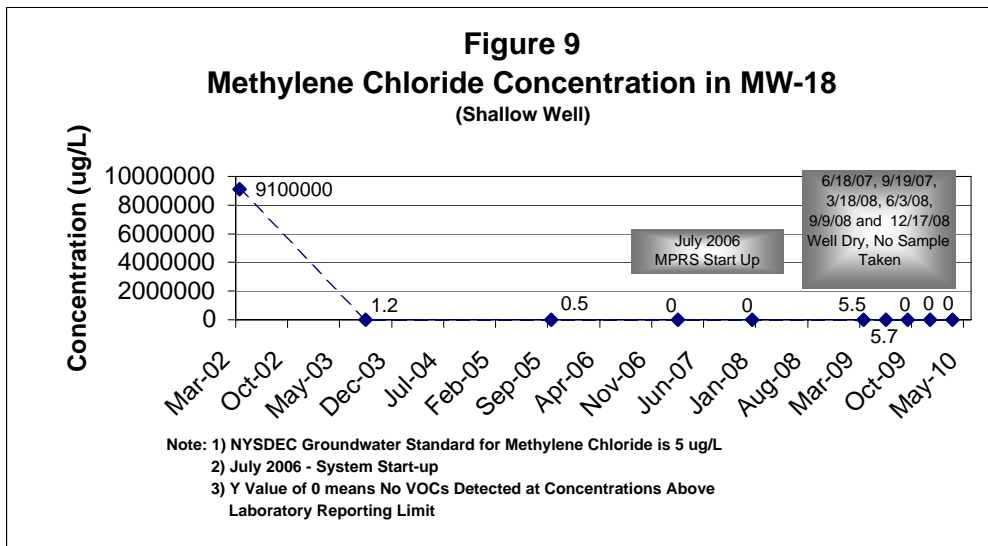
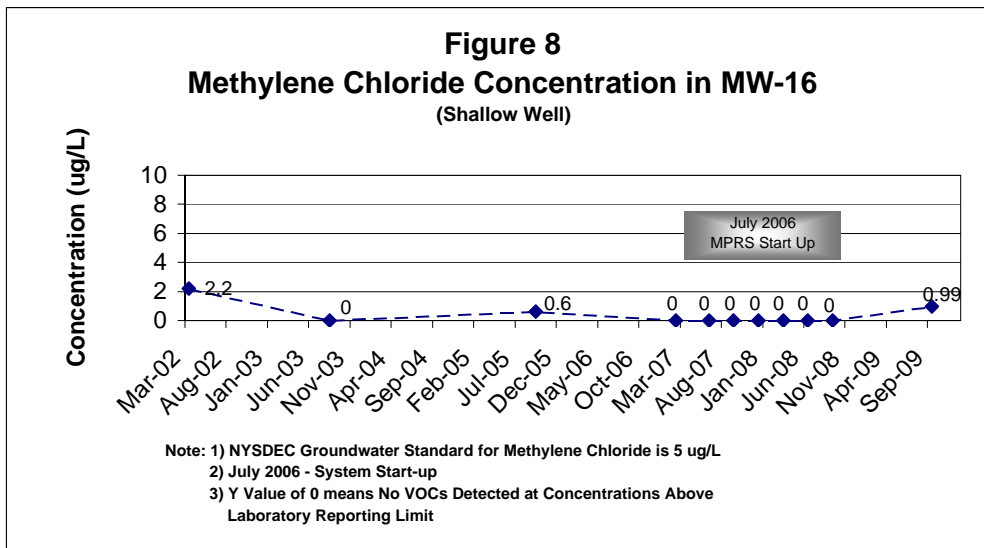
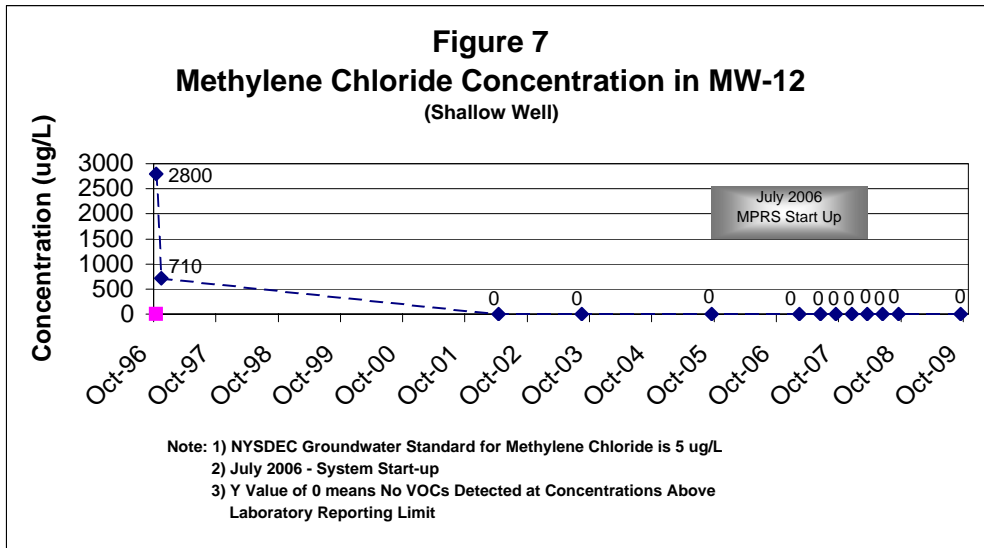


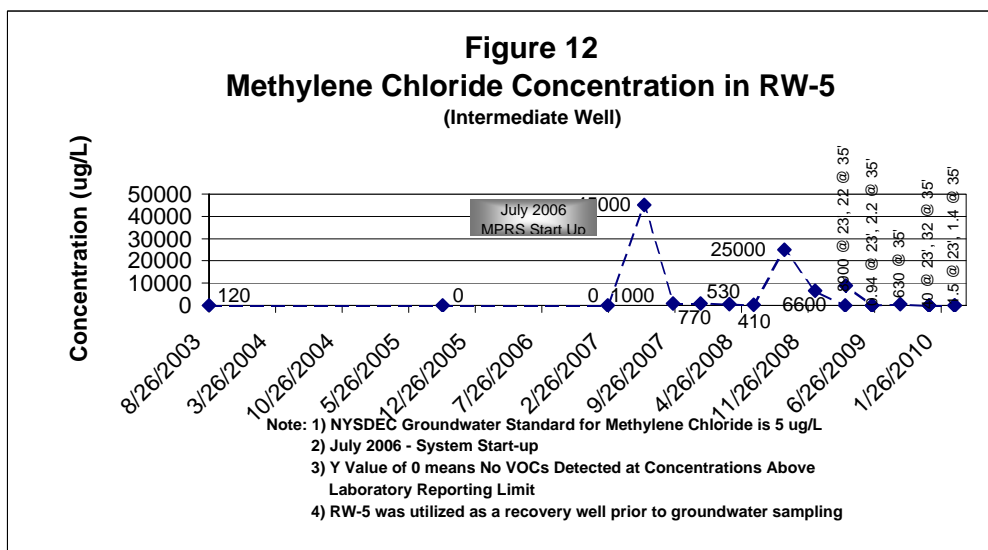
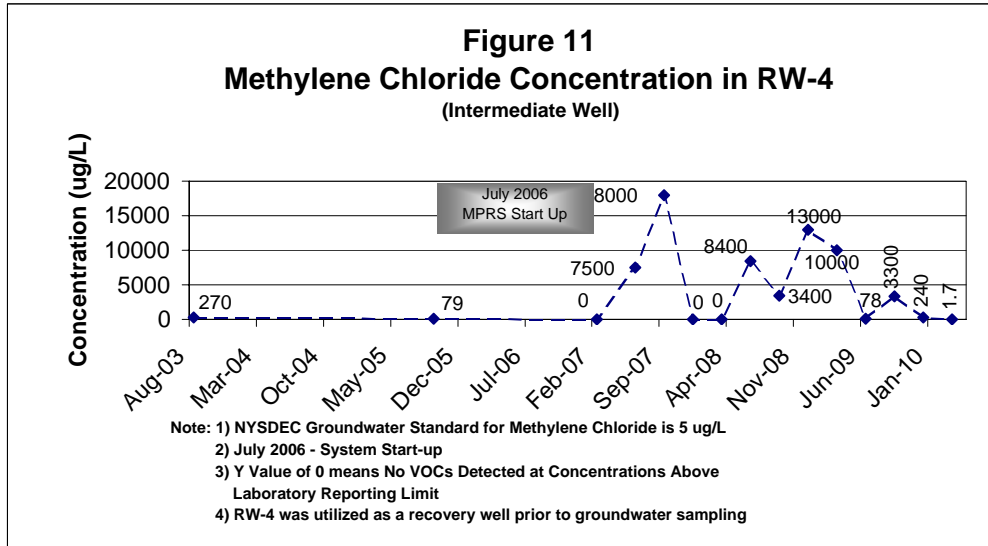
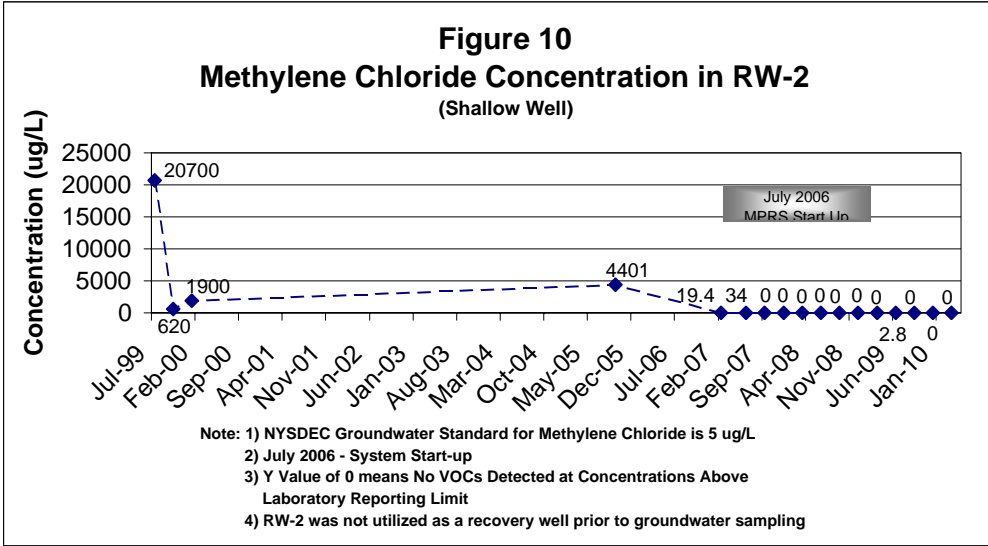
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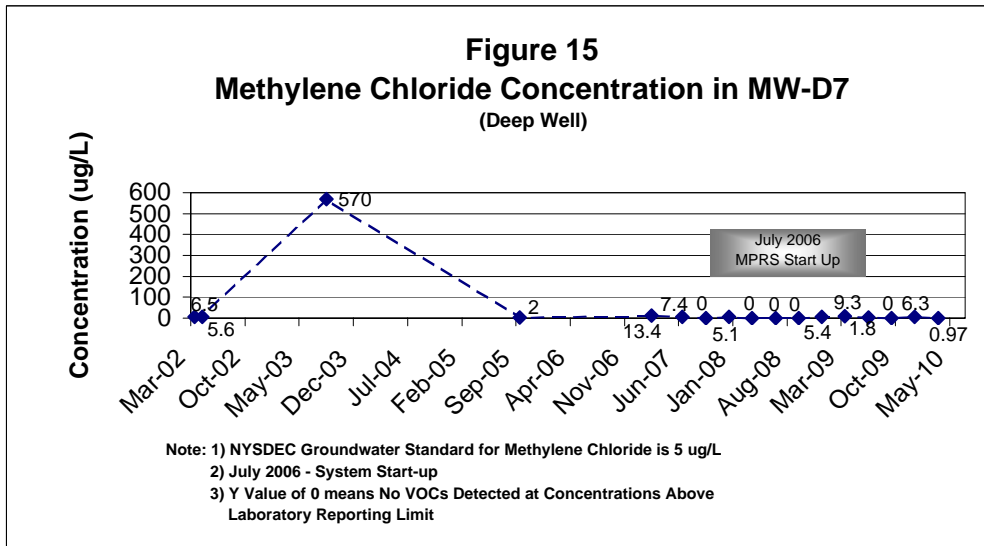
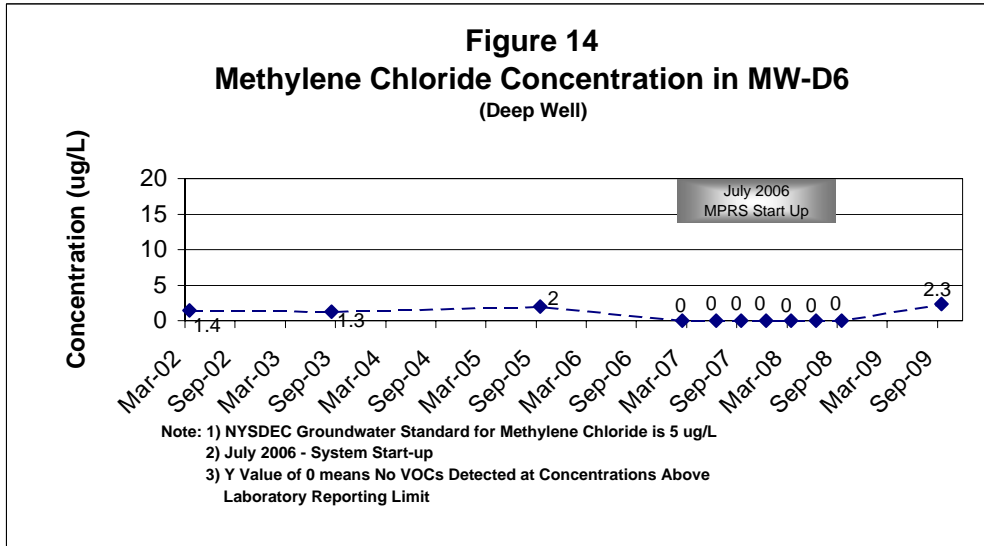
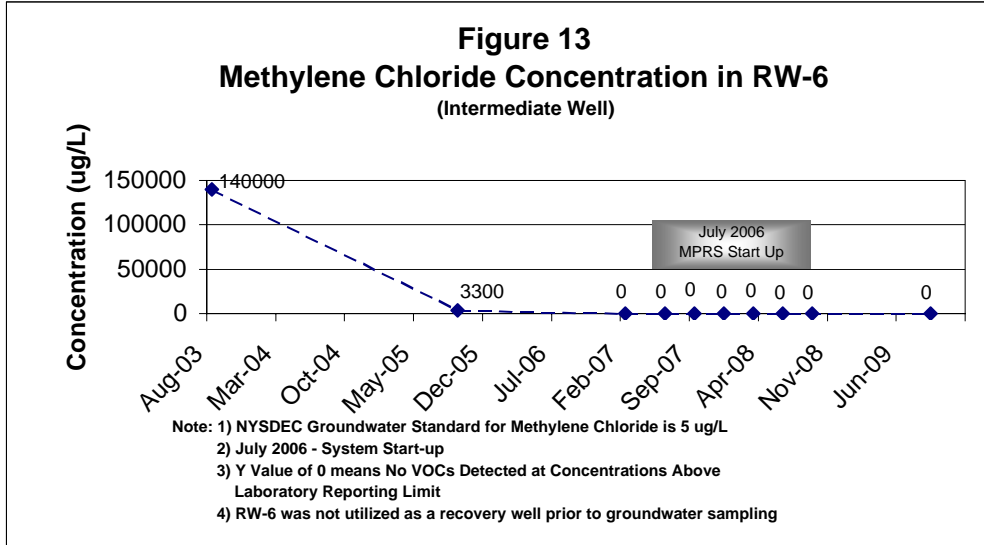
**DIAGONAL WELL
POTENTIOMETRIC CONVERSION**

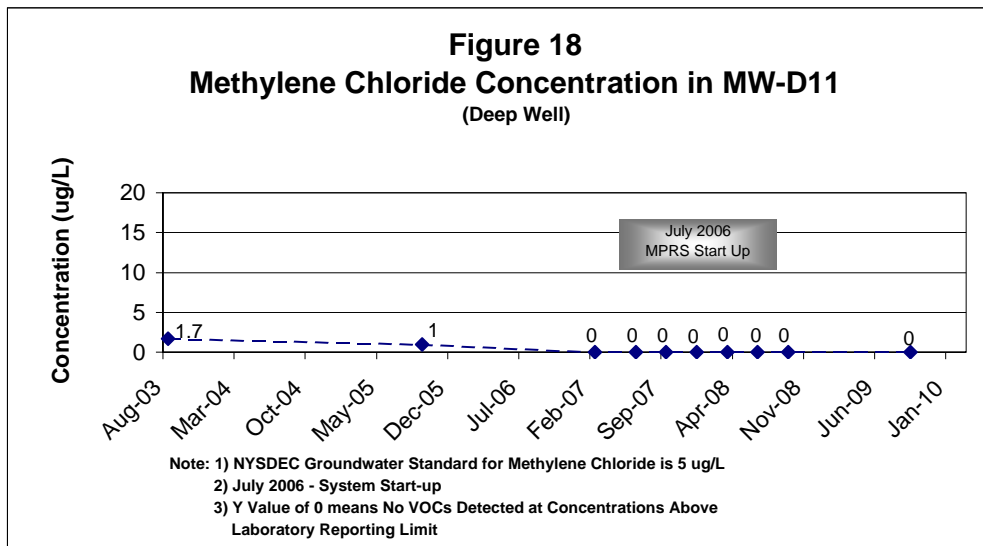
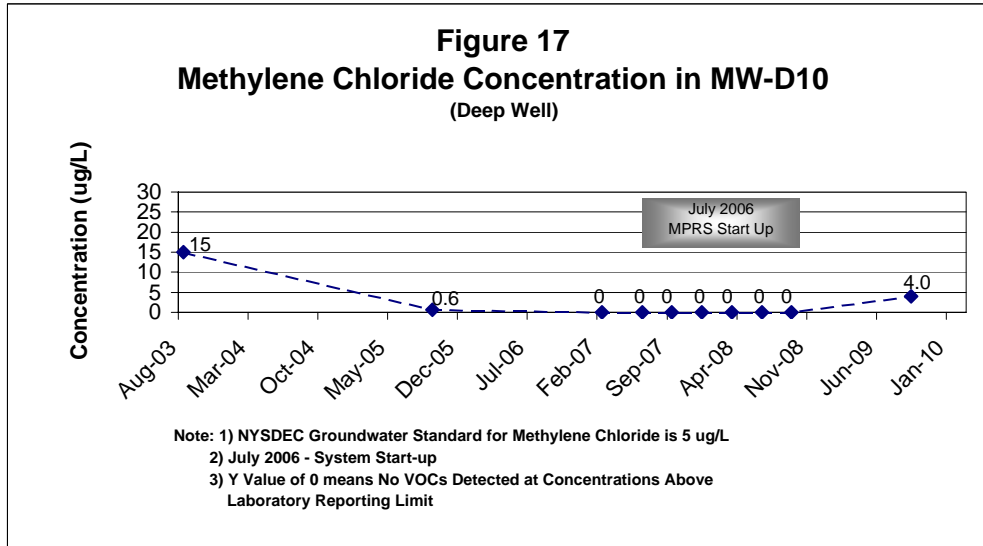
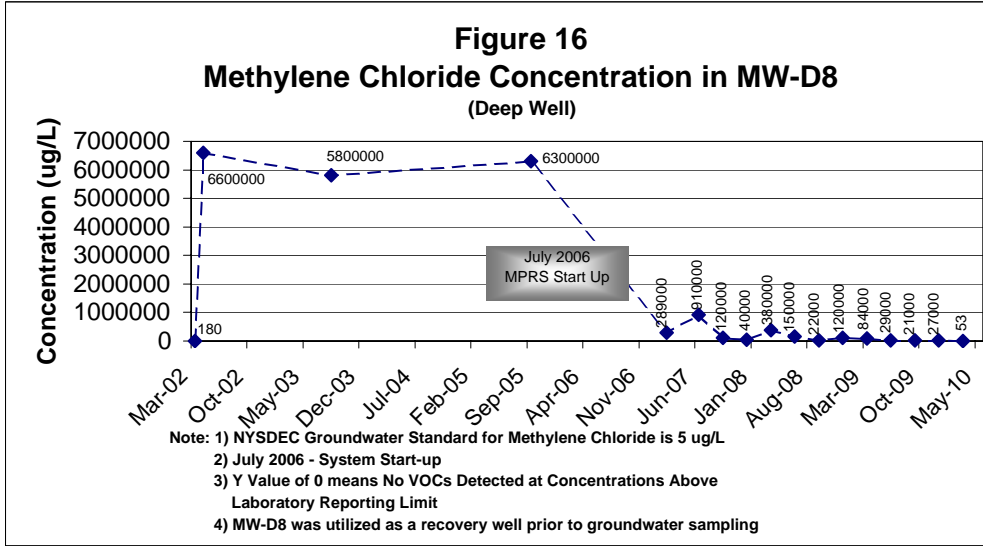
UCB FACILITY
NYSDEC VCP# V00126-8
755 JEFFERSON ROAD

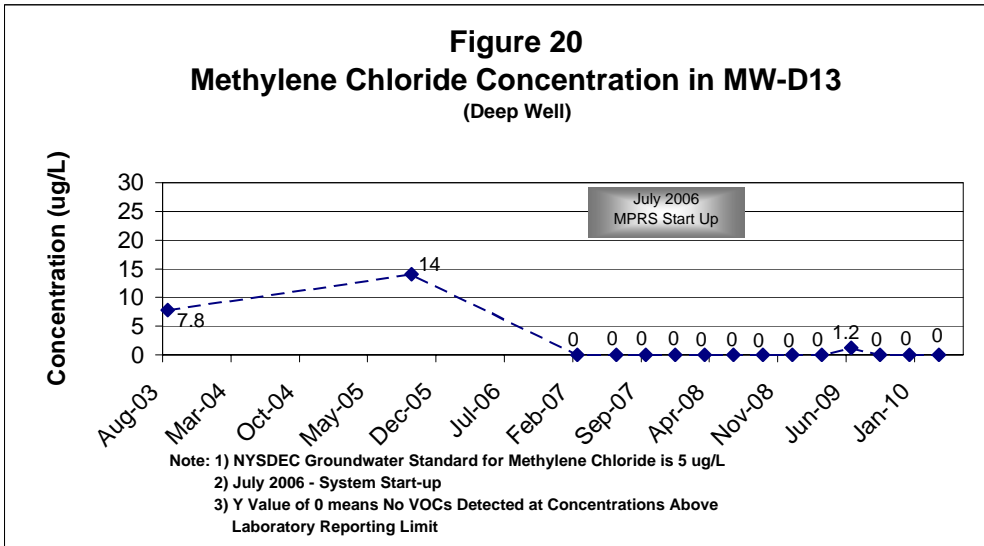
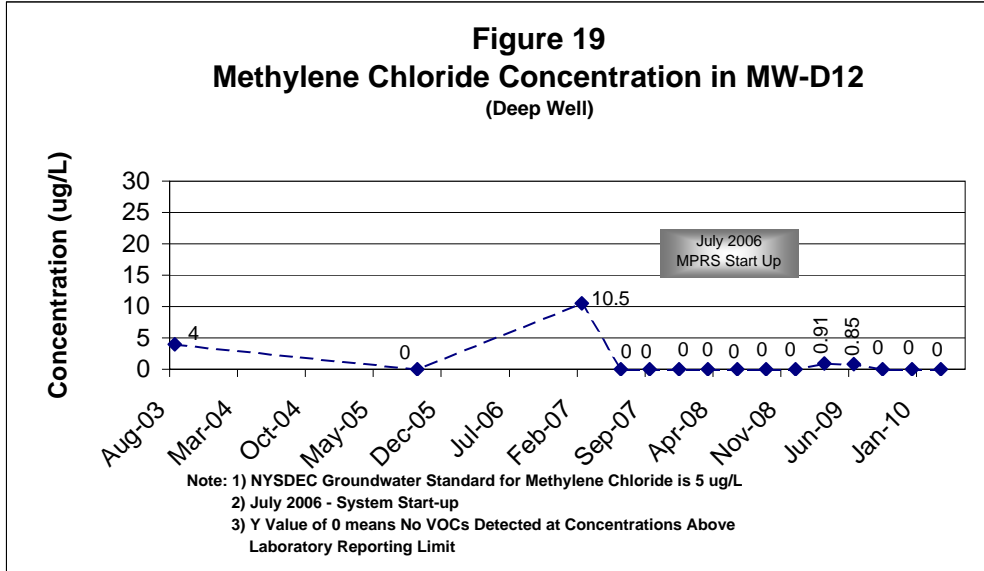
FIGURE
6











Appendix A
Monthly Progress Reports – January, February and March 2010



February 5, 2010

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: Monthly Progress Report – January 2010
755 Jefferson Road Facility – Henrietta, New York
NYSDEC VCP Number V00126-8

***Key Actions
This Period:***

- **January 1 – January 31, 2010.** The system was intermittently operational in accordance with the NYSDEC approved pulsing plan.

Operations Metrics (January 18 – January 25)

- Operational Time: 178 out of a scheduled 178 hours of operation.
- Uptime Efficiency: 100%
- Volume of Groundwater Treated: 5,380 gallons.
 - Discharged to: The sanitary sewer system.
- Total estimated VOC mass recovered to date: 138.3 lbs.
- Total estimated VOC mass recovered during January: 0.13 lbs.
- Mean estimated VOC mass removal rate for January 2010 versus December 2009: 0.0007 versus 0.0012 lbs/hr.
- General weather conditions: Average precipitation and average temperatures as compared to historical data.

Tables, Figures and Graphs

- Table 1: November Treated Waste Water Flow/Vapor Monitoring Data.
- Table 2: November Recovery Well Rotation Data.
- Figures 1-9: Remedial Effectiveness and Efficiency Platform (REEP) graphs
- Figures 2A and 3A: Selected Remedial Effectiveness and Efficiency Platform (REEP) graphs showing results from January 2009 to present.

***Problems/
Resolutions:***

- None

***Analytical Data
Received:***

- The January 2010 MPRS liquid influent analytical data.
- The January 2010 MPRS vapor influent analytical data.

***Documents
Submitted:***

- Monthly Progress Report for December 2010 dated January 10, 2010.

**Anticipated
Actions –
February
2010:**

- Continue NYSDEC approved pulsing program until permission is granted to terminate system operation.

Comments:

- The attached REEP information is to be utilized as a subjective representation of the overall effectiveness/performance of the system as we are using discontinuous data and PID measurements for the removal calculations. We do not intend this tool as a definitive summary of recovered mass.
- MPRS operation and efficiency, inclusive of the replacement LRP pump and associated upgrades and maintenance, will continue to be monitored.
- Submittal of the Post Remedial Construction OM&M FER, Closure Request and Certification and revised Site Management Plan is anticipated in February 2010.

**NYSDEC-
Approved Field
Decisions:**

- Continuation of pulsing of MPRS system in accordance with the procedure presented to NYSDEC.

If you have any questions regarding this monthly report or progress on the project, please don't hesitate to contact me at 513-314-7543 or rbethel@qmg-inc.com.

Sincerely,
QUANTUM MANAGEMENT GROUP, INC.



Rick Bethel
Senior Associate

Attachments

cc:

Mr. Jeffrey M. Kosmala, P.E. (MCDOH)
Mr. Michael Bogdan (Sanofi-Aventis)
Mr. Richard Ricci (Lowenstein Sandler PC)
Mr. Mark Byrne, P.E. (Town of Henrietta)
Ms. Libby Ford, (Nixon Peabody)
Mr. Greg Light (UCB)
Mr. George Hollerbach, P.E. (Quantum)

Ms. Melissa Menetti (NYSDOH)
Mr. David Panipinto (UCB)
Mr. Bart Putzig, P.E. (NYSDEC)
Mr. Sean Keenan (MCDES)
Mr. John Lang, P.E. (Quantum)

**TABLE 1 - TREATED WASTE WATER FLOW/VAPOR MONITORING DATA
MCA REMEDIATION SYSTEM
755 JEFFERSON ROAD, HENRIETTA, NEW YORK
NYSDEC VCP NUMBER V00126-8
January 2010**

Date	Time¹	Cumulative Hours²	Total Flow³ Gallons	Flow Rate⁴ Gal/Min	Cumulative Gallons^{5,6}	Influent PID (ppm)	Effluent PID (ppm)
12/16/2009	11:02	39582.9	103	1.0	315,898	1.1	0.1
1/18/2010	7:32	39589.1	171	0.5	316,069	0.5	0.1
1/18/2010	9:40	39591.2	251	2.0	316,320	0.5	0.1
1/20/2010	9:11	39638.7	2,100	0.7	318,420	0.7	0.0
1/20/2010	10:59	39640.5	145	1.3	318,565	0.6	0.0
1/22/2010	9:14	39686.8	1,108	0.4	319,673	0.8	0.2
1/22/2010	11:23	39688.9	117	0.9	319,790	0.6	0.0
1/25/2010	9:31	39759.1	1,328	0.3	321,118	0.7	0.0
1/25/2010	11:22	39760.9	160	1.4	321,278	0.5	0.0

¹Time of day (in military time) data was collected.

²Cumulative Hours represents the number of run-hours since MCA remediation system start-up on 12 July 2006.

³Total Flow in Gallons represents the flow that occurred since the time the last measurement was collected, as indicated in the previous row of the table.

⁴Flow Rate in Gallons/Minute represents the average flow rate since the time the last measurement was collected, as indicated in the previous row of the

⁵Cumulative Gallons represents the number of gallons of water treated by the MCA remediation system since start-up on 12 July 2006.

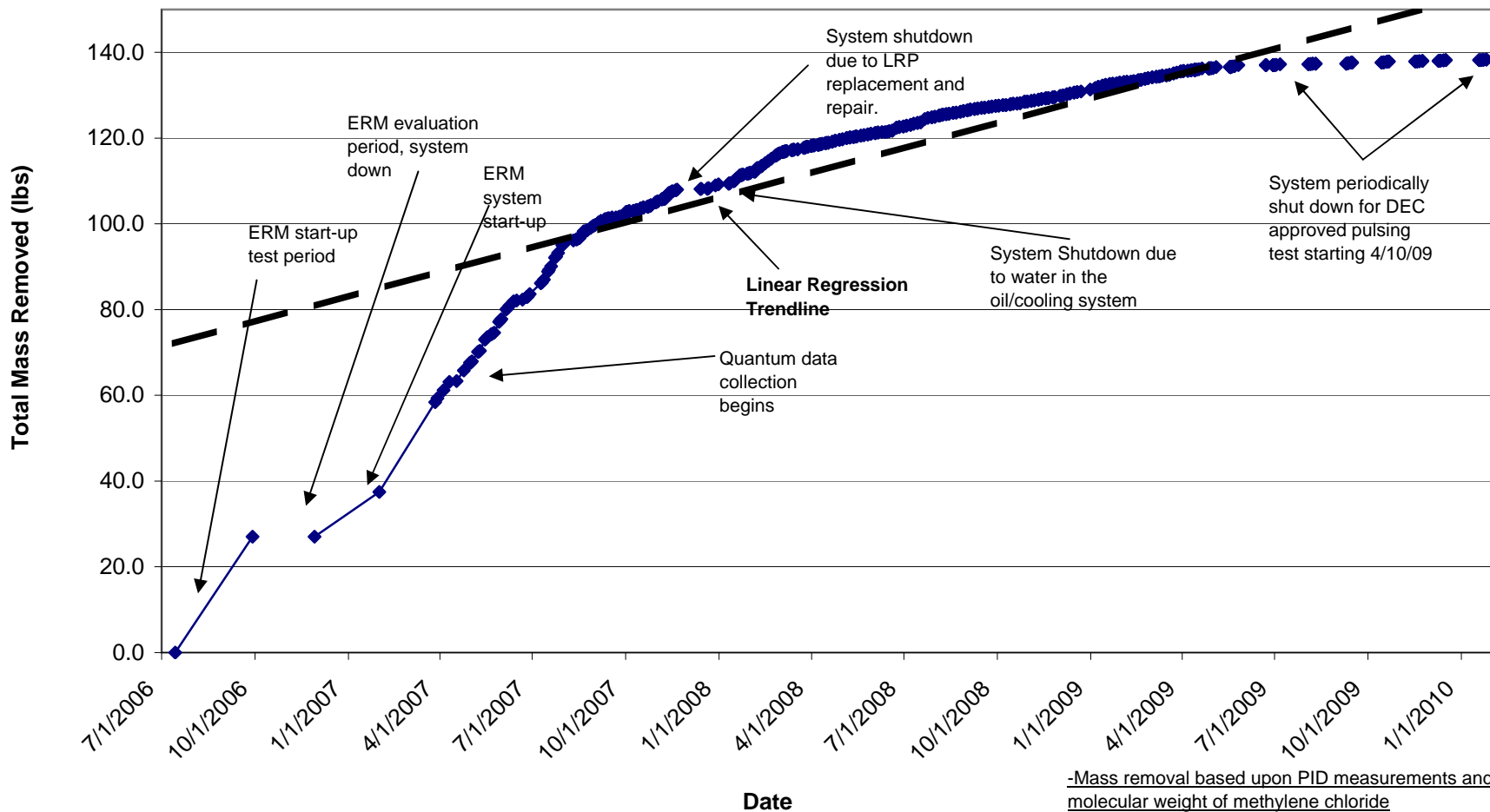
⁶Totalizer Flow readings collected from newly installed totalizer beginning October 2, 2007.

TABLE 2 - RECOVERY WELL ROTATION DATA
MCA REMEDIATION SYSTEM
755 JEFFERSON ROAD, HENRIETTA, NEW YORK
NYSDEC VCP NUMBER V00126-8
January 2010

Date	Well Rotation Clusters								
	EXSB-2	MW-D8	MW -21	MW-22	MW-20A	MW-20B	RW-6	RW-5	RW-4
January 1-17	System shut down as part of NYSDEC approved pulsing program								
January 18-25		X						X	X
January 26-31	System shut down as part of NYSDEC approved pulsing program								

Figure 1
MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
January 2010

Total VOC Mass Removed (Vapor and Ground Water Combined)



-Mass removal based upon PID measurements and the molecular weight of methylene chloride
-Down time greater than 7 days identified on chart

Figure 2

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
January 2010

Total VOC Mass Removal Rate (Vapor & Ground Water Combined)

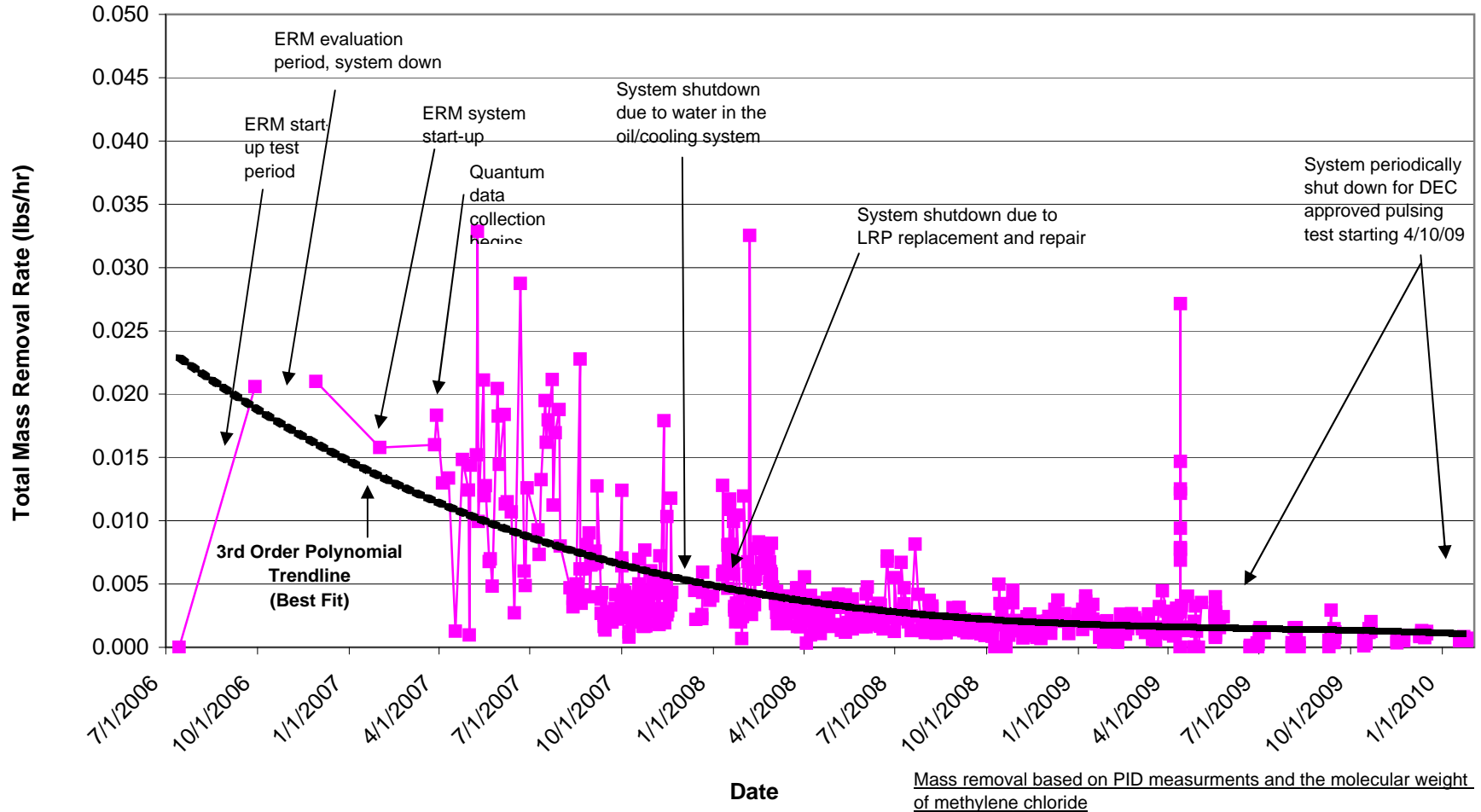


Figure 2A

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
January 2010

Total VOC Mass Removal Rate (Vapor & Ground Water Combined) Since January 2009

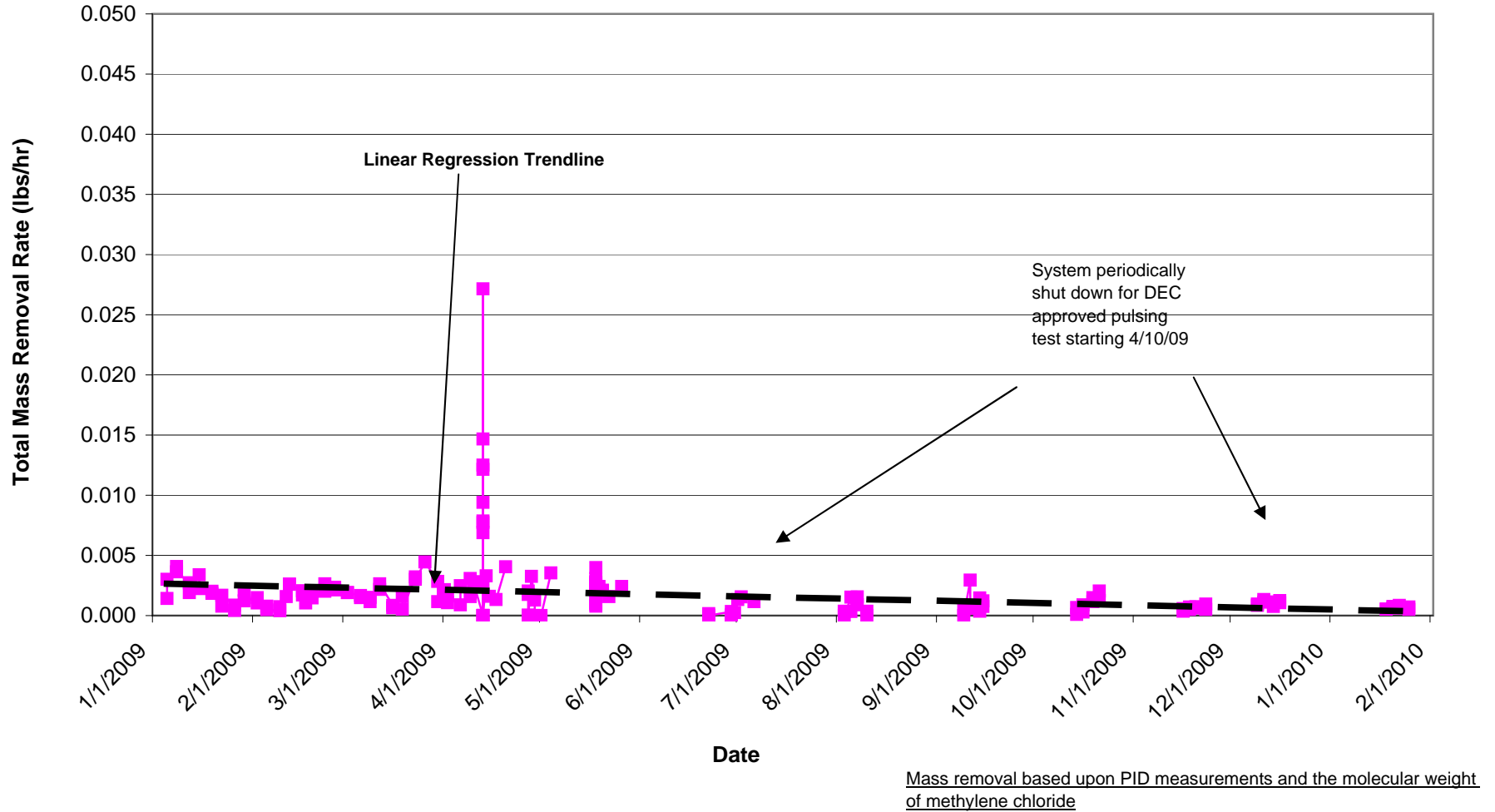


Figure 3

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
January 2010

Vapor Mass Removal Rate

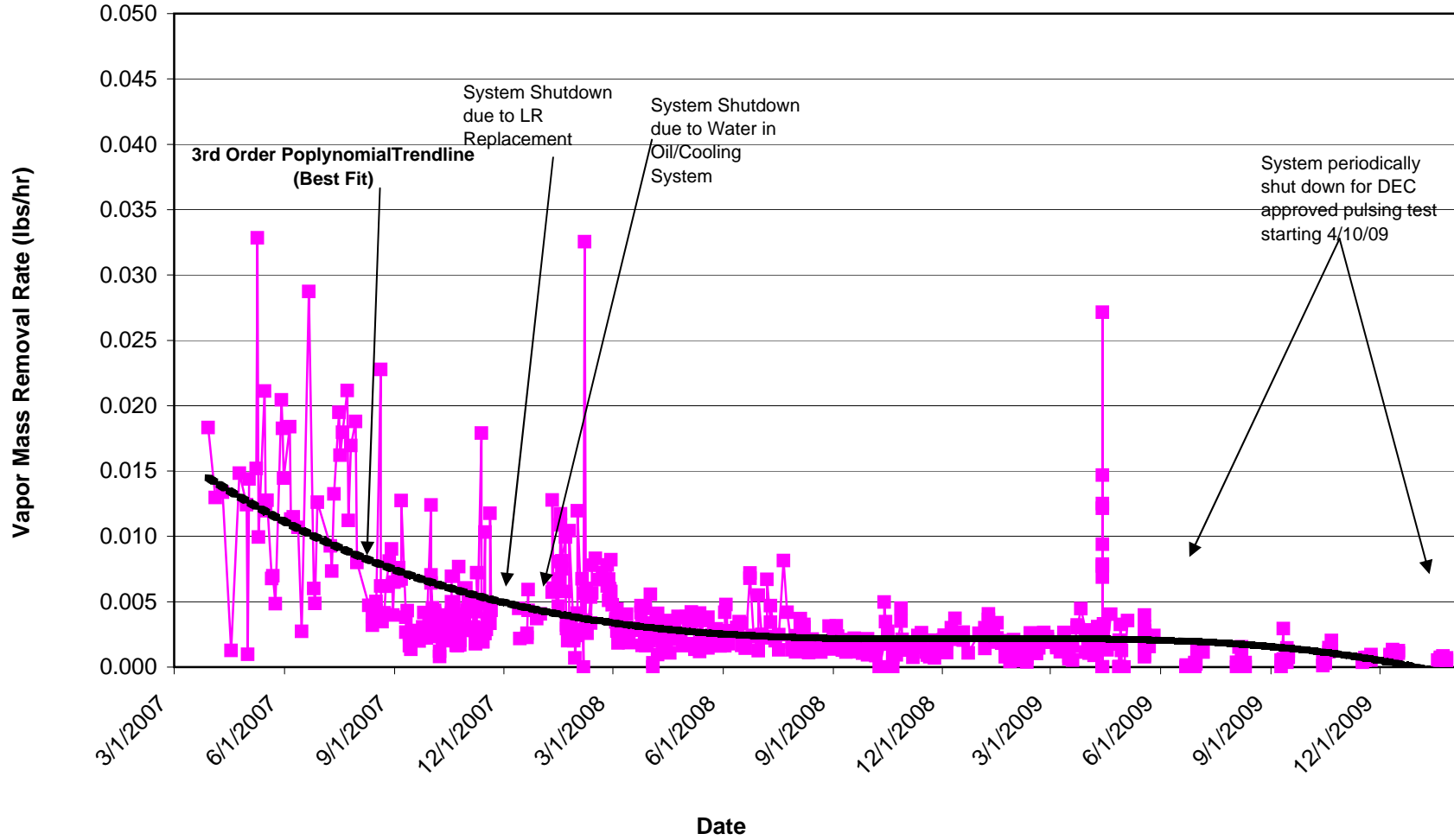


Figure 3A

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
January 2010

Vapor Mass Removal Rate Since January 2009

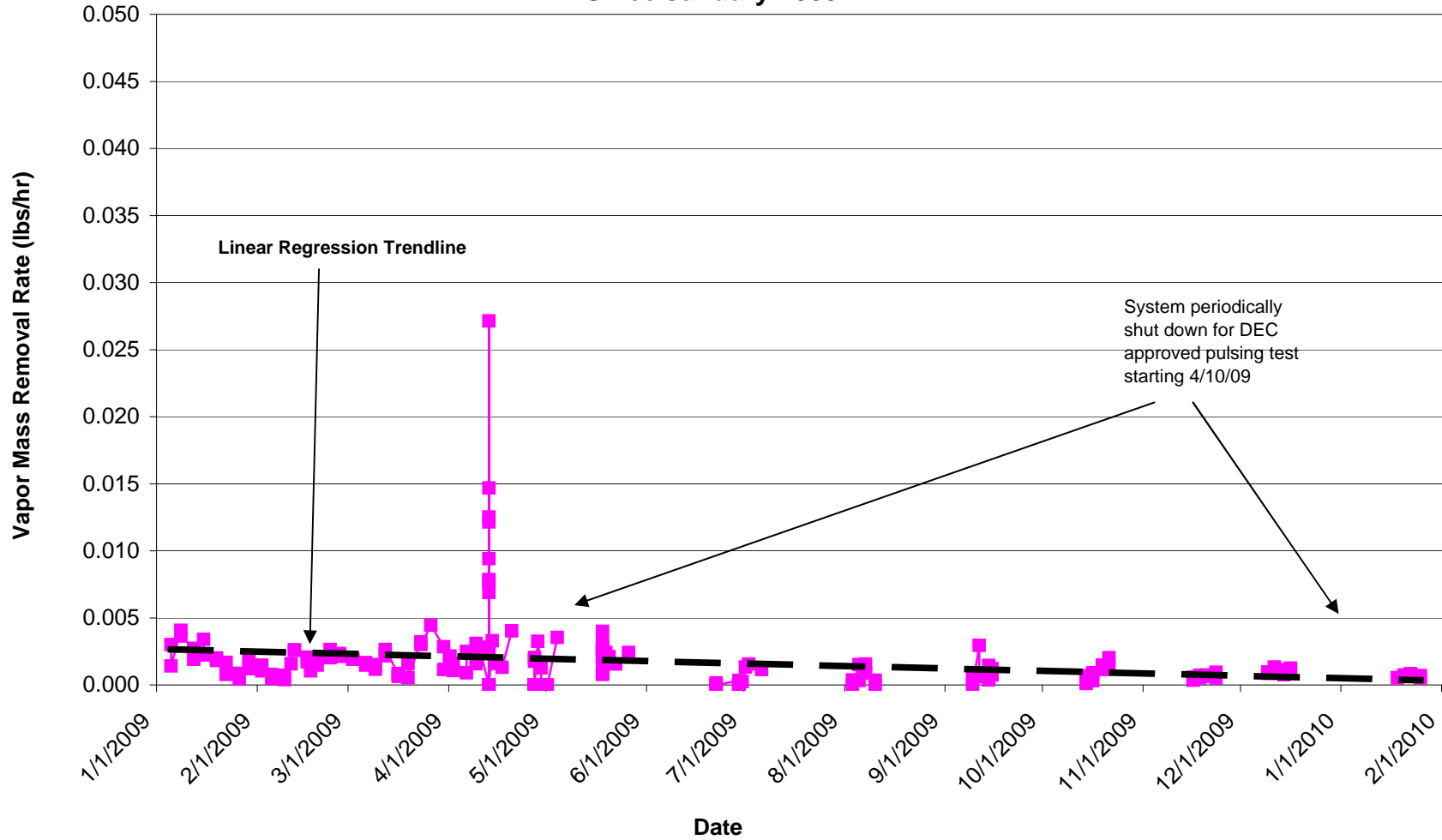
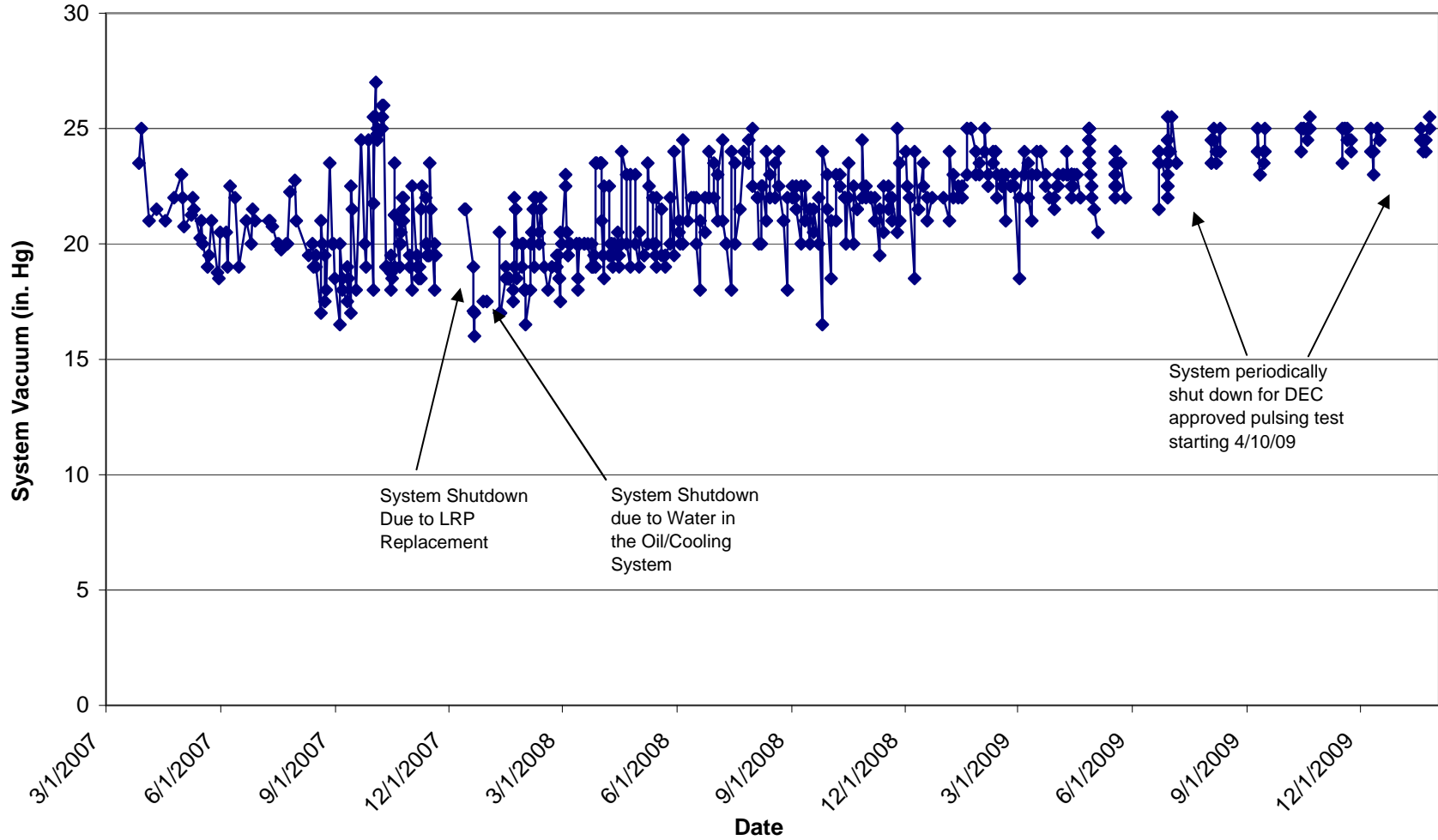


Figure 4

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
January 2010

System Vacuum



-Down time greater than 7 days identified on chart

Figure 5

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
January 2010

System Vapor Flow Rate

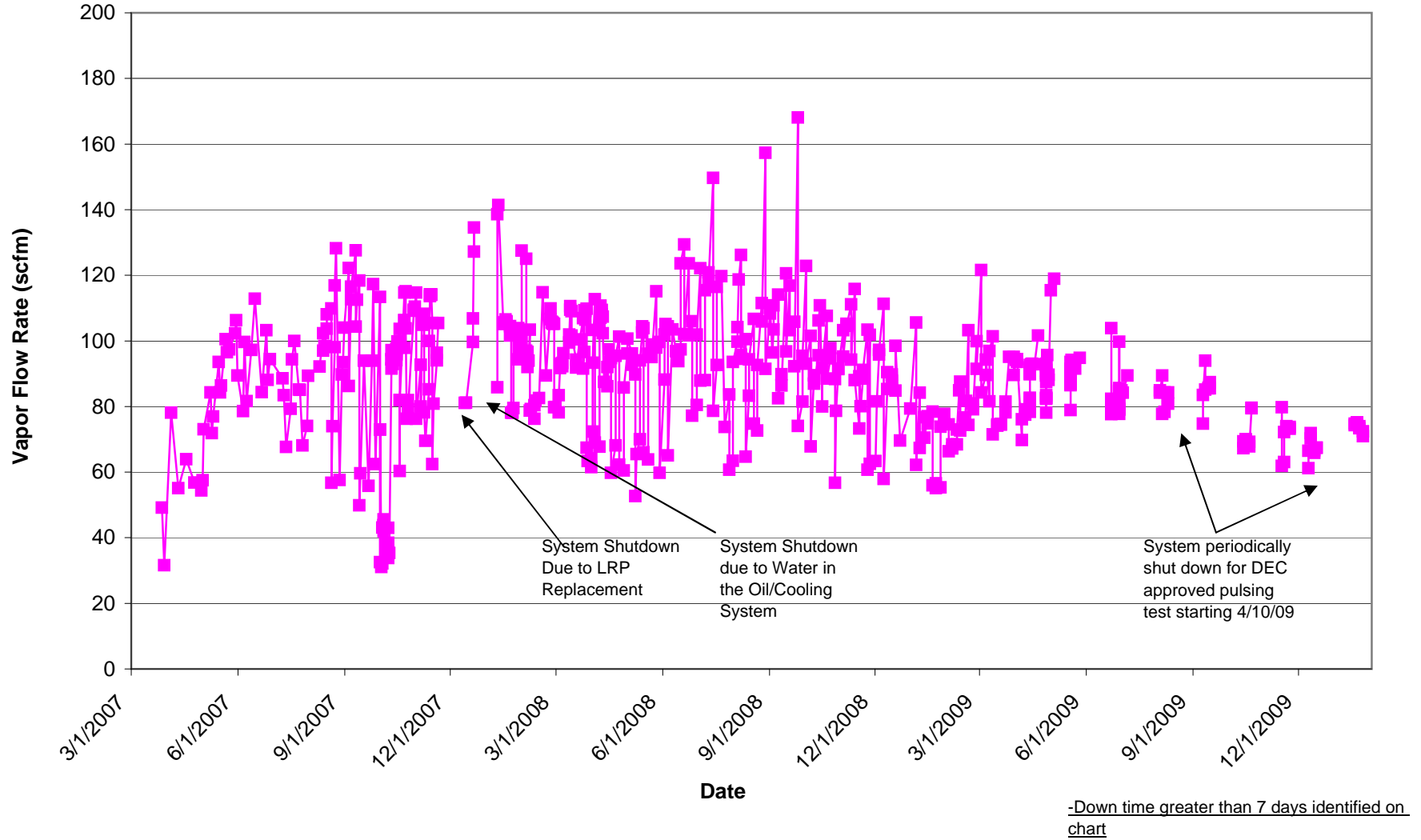
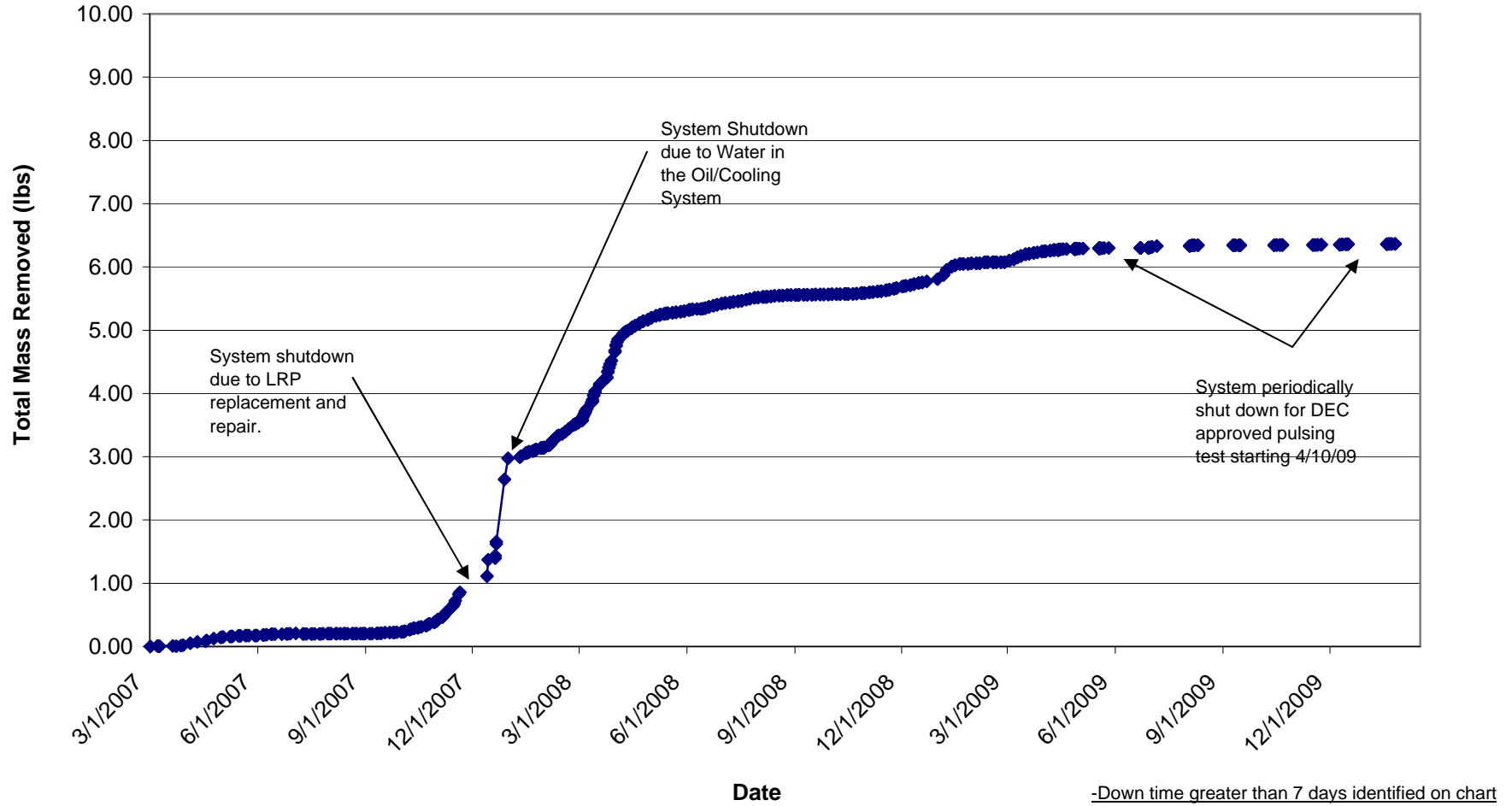


Figure 6

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
January 2010

Total MeCl Mass Removed (Ground Water)

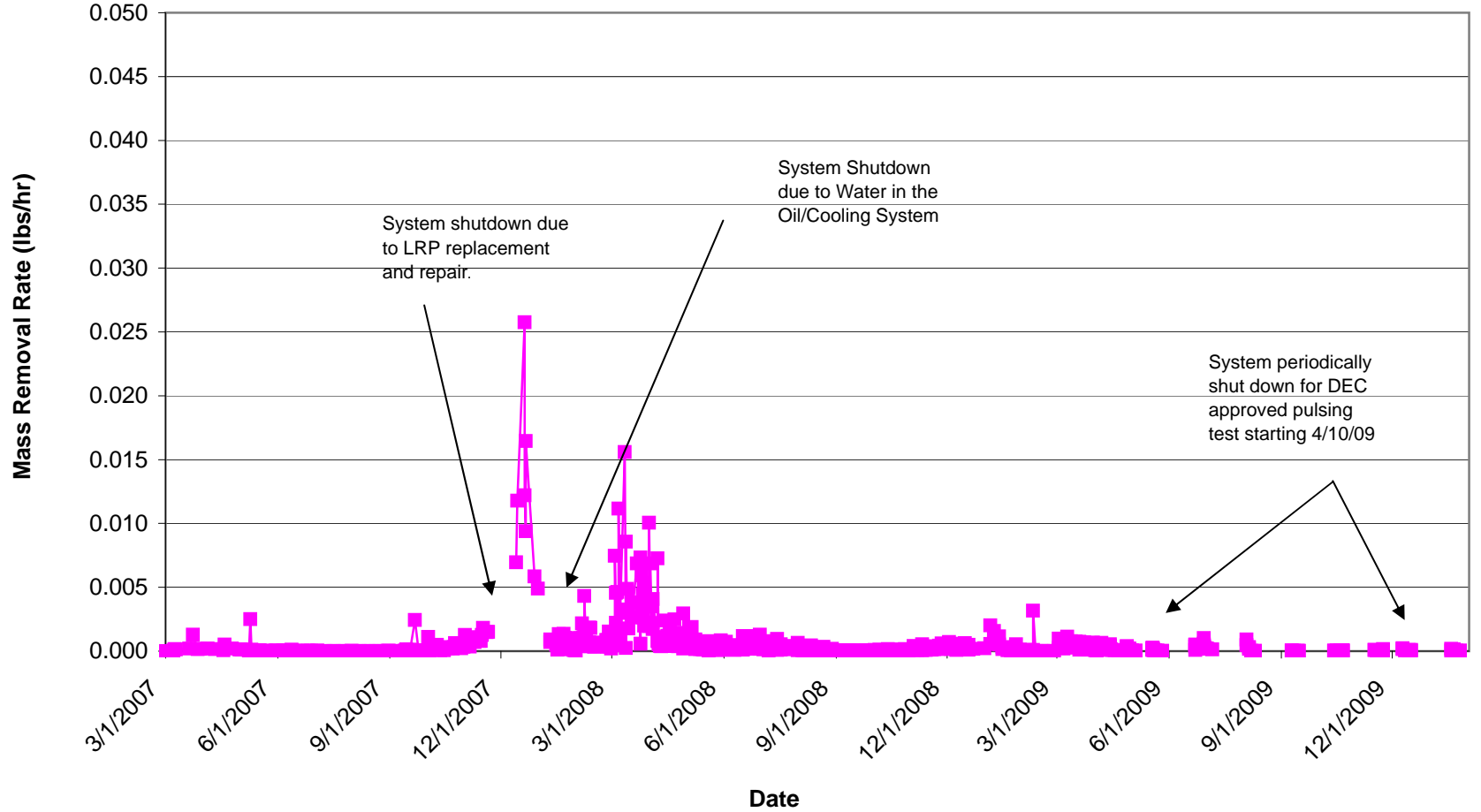


-Down time greater than 7 days identified on chart

Figure 7

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
January 2010

MeCl Mass Removal Rate (Ground Water)



-Down time greater than 7 days identified on chart

Figure 8

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
January 2010

Cumulative Ground Water Flow

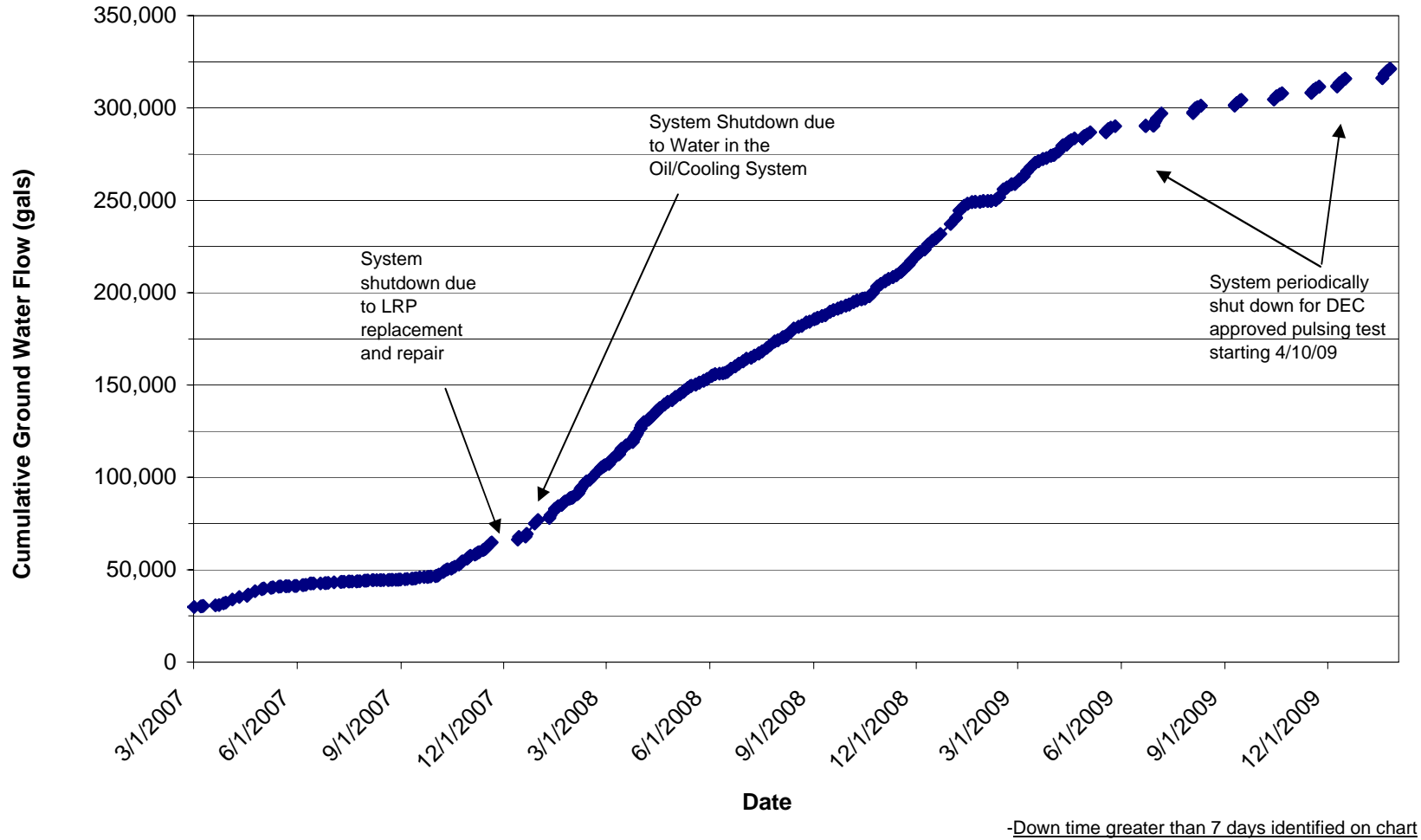
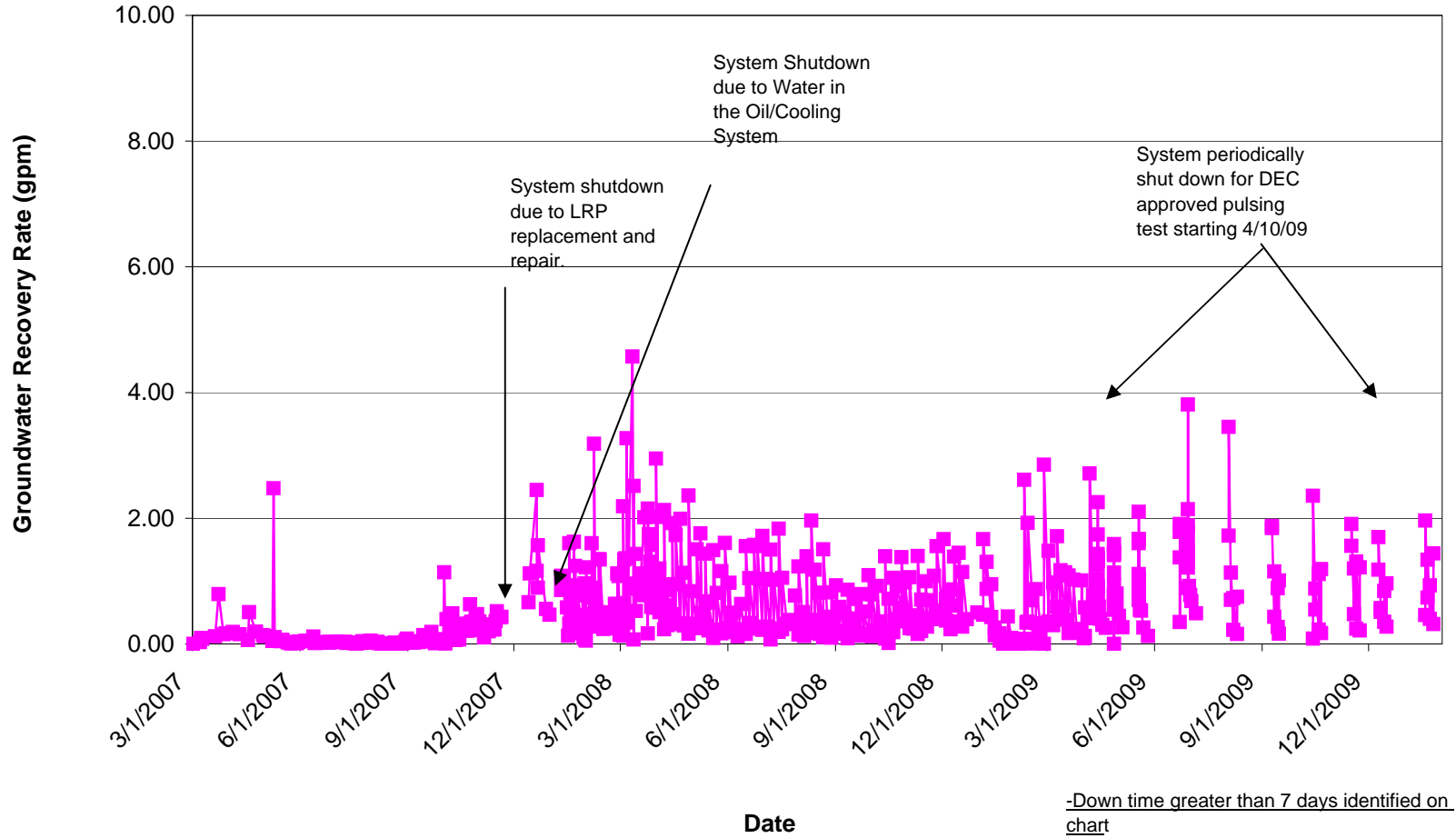


Figure 9

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
January 2010

Ground Water Recovery Rate





PARADIGM
ENVIRONMENTAL SERVICES, INC.

Analytical Report Cover Page

Quantum Management Group

For Lab Project # 10-0367

Issued January 29, 2010

This report contains a total of 4 pages

The reported results relate only to the samples as they have been received by the laboratory.

Any noncompliant QC parameters having impact on the data are flagged or documented on the final report.

All soil/sludge samples have been reported on a dry weight basis, unless qualified "reported as received". Other solids are reported as received.

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The Chain of Custody provides additional information, including compliance with sample condition requirements upon receipt. Sample condition requirements are defined under the 2003 NELAC Standard, sections 5.5.8.3.1 and 5.5.8.3.2.

NYSDOH ELAP does not certify for all parameters. Paradigm Environmental Services or the indicated subcontracted laboratory does hold certification for all analytes where certification is offered by ELAP unless otherwise specified.

Data qualifiers are used, when necessary, to provide additional information about the data. This information may be communicated as a flag or as text at the bottom of the report. Please refer to the following list of frequently used data flags and their meaning:

"ND" = analyzed for but not detected.

"E" = Result has been estimated, calibration limit exceeded.

"D" = Duplicate results outside QC limits. May indicate a non-homogenous matrix.

"M" = Matrix spike recoveries outside QC limits. Matrix bias indicated.

"B" = Method blank contained trace levels of analyte. Refer to included method blank report.

Volatile Analysis Report for Water

Client: **Quantum Management Group**

Client Job Site:	MPRS @ UCB Jefferson Rd	Lab Project Number:	10-0367
Client Job Number:	N/A	Lab Sample Number:	1961
Field Location:	PreBT / Inf 1,2,3 Comp	Date Sampled:	01/22/2010
Field ID Number:	N/A	Date Received:	01/22/2010
Sample Type:	Water	Date Analyzed:	01/28/2010

Liquid Influent

Compounds	Results in ug / L
Acetone	ND< 10.0
Amyl Acetate	ND< 25.0
Benzene	ND< 0.700
2-Butanone	ND< 10.0
Carbon disulfide	ND< 5.00
Chloroform	ND< 2.00
Chloromethane	ND< 2.00
cis-1,2-Dichloroethene	ND< 2.00
Ethyl acetate	ND< 25.0
Isopropyl acetate	ND< 25.0
Methylene chloride	60.5
m,p-Xylene	ND< 2.00
o-Xylene	ND< 2.00

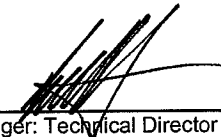
ELAP Number 10958

Method: EPA 624

Data File: V72477.D

Comments: ND denotes Non Detect
ug / L = microgram per Liter

Signature: _____


Bruce Hoogesteger: Technical Director

Volatile Analysis Report for Air

Client: Quantum Management Group

Client Job Site: MPRS @ UCB Jefferson Rd	Lab Project Number: 10-0367	Lab Sample Number: 1962
Client Job Number: N/A	Date Sampled: 01/22/2010	Date Received: 01/22/2010
Field Location: SP-102	Date Analyzed: 01/29/2010	
Field ID Number: N/A		
Sample Type: Air		

Vapor Influent

Compound	Results in PPBv	Results in ug / m3
Acetone	ND< 4,220	ND< 10,000
Benzene	ND< 627	ND< 2,000
2-Butanone	ND< 3,400	ND< 10,000
Carbon disulfide	ND< 643	ND< 2,000
Chloroform	ND< 414	ND< 2,000
Chloromethane	ND< 978	ND< 2,000
cis-1,2-Dichloroethene	ND< 509	ND< 2,000
Methylene chloride	ND< 1,460	ND< 5,000
m,p-Xylene	ND< 461	ND< 2,000
o-Xylene	ND< 461	ND< 2,000

ELAP Number 10958

Method: EPA 8260B
Modified for Tedlar Bag

Data File: V72507.D

Comments: ND denotes Non Detect
PPBv = Parts per Billion volume
ug / m3 - Microgram per cubic meter.

Signature: _____

Bruce Hoogesteger: Technical Director



March 9, 2010

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: Monthly Progress Report – February 2010
755 Jefferson Road Facility – Henrietta, New York
NYSDEC VCP Number V00126-8

***Key Actions
This Period:***

- **February 1 – February 28, 2010.** The system was intermittently operational in accordance with the NYSDEC approved pulsing plan.

Operations Metrics (February 22 – March 1)

- Operational Time: 169 out of a scheduled 169 hours of operation.
- Uptime Efficiency: 100%
- Volume of Groundwater Treated: 4,689 gallons.
 - Discharged to: The sanitary sewer system.
- Total estimated VOC mass recovered to date: 138.4 lbs.
- Total estimated VOC mass recovered during February: 0.08 lbs.
- Mean estimated VOC mass removal rate for February 2010 versus January 2010: 0.0005 versus 0.0007 lbs/hr.
- General weather conditions: Above average precipitation and average temperatures as compared to historical data.

Tables, Figures and Graphs

- Table 1: November Treated Waste Water Flow/Vapor Monitoring Data.
- Table 2: November Recovery Well Rotation Data.
- Figures 1-9: Remedial Effectiveness and Efficiency Platform (REEP) graphs
- Figures 2A and 3A: Selected Remedial Effectiveness and Efficiency Platform (REEP) graphs showing results from February 2009 to present.

***Problems/
Resolutions:***

- None

***Analytical Data
Received:***

- The February 2010 MPRS liquid influent analytical data.
- The February 2010 MPRS vapor influent analytical data.

***Documents
Submitted:***

- Monthly Progress Report for January 2010 dated February 5, 2010.

**Anticipated
Actions –
March
2010:**

- Continue NYSDEC approved pulsing program until permission is granted to terminate system operation.

Comments:

- The attached REEP information is to be utilized as a subjective representation of the overall effectiveness/performance of the system as we are using discontinuous data and PID measurements for the removal calculations. We do not intend this tool as a definitive summary of recovered mass.
- MPRS operation and efficiency, inclusive of the replacement LRP pump and associated upgrades and maintenance, will continue to be monitored.
- Submittal of the Post Remedial Construction OM&M FER, Closure Request and Certification and revised Site Management Plan is anticipated in April 2010.

**NYSDEC-
Approved Field
Decisions:**

- Continuation of pulsing of MPRS system in accordance with the procedure presented to NYSDEC.

If you have any questions regarding this monthly report or progress on the project, please don't hesitate to contact me at 513-314-7543 or rbethel@qmg-inc.com.

Sincerely,
QUANTUM MANAGEMENT GROUP, INC.



Rick Bethel
Senior Associate

Attachments

cc:

Mr. Jeffrey M. Kosmala, P.E. (MCDOH)
Mr. Michael Bogdan (Sanofi-Aventis)
Mr. Richard Ricci (Lowenstein Sandler PC)
Mr. Mark Byrne, P.E. (Town of Henrietta)
Ms. Libby Ford, (Nixon Peabody)
Mr. Greg Light (UCB)
Mr. George Hollerbach, P.E. (Quantum)

Ms. Melissa Menetti (NYSDOH)
Mr. David Panipinto (UCB)
Mr. Bart Putzig, P.E. (NYSDEC)
Mr. Sean Keenan (MCDES)
Mr. John Lang, P.E. (Quantum)

**TABLE 1 - TREATED WASTE WATER FLOW/VAPOR MONITORING DATA
MCA REMEDIATION SYSTEM
755 JEFFERSON ROAD, HENRIETTA, NEW YORK
NYSDEC VCP NUMBER V00126-8
February 2010**

Date	Time¹	Cumulative Hours²	Total Flow³ Gallons	Flow Rate⁴ Gal/Min	Cumulative Gallons^{5,6}	Influent PID (ppm)	Effluent PID (ppm)
1/25/2010	11:22	39760.9	160	1.4	321,278	0.5	0.0
2/22/2010	10:15	39761.3	18	0.8	321,296	0.3	0.0
2/22/2010	12:31	39763.6	71	0.5	321,367	0.2	0.0
2/24/2010	9:18	39808.4	1,589	0.6	322,956	0.5	0.0
2/24/2010	11:18	39810.4	178	1.5	323,134	0.3	0.0
3/1/2010	9:15	39928.3	2,743	0.4	325,877	0.6	0.0
3/1/2010	11:19	39930.4	90	0.7	325,967	0.2	0.0

¹Time of day (in military time) data was collected.

²Cumulative Hours represents the number of run-hours since MCA remediation system start-up on 12 July 2006.

³Total Flow in Gallons represents the flow that occurred since the time the last measurement was collected, as indicated in the previous row of the table.

⁴Flow Rate in Gallons/Minute represents the average flow rate since the time the last measurement was collected, as indicated in the previous row of the table.

⁵Cumulative Gallons represents the number of gallons of water treated by the MCA remediation system since start-up on 12 July 2006.

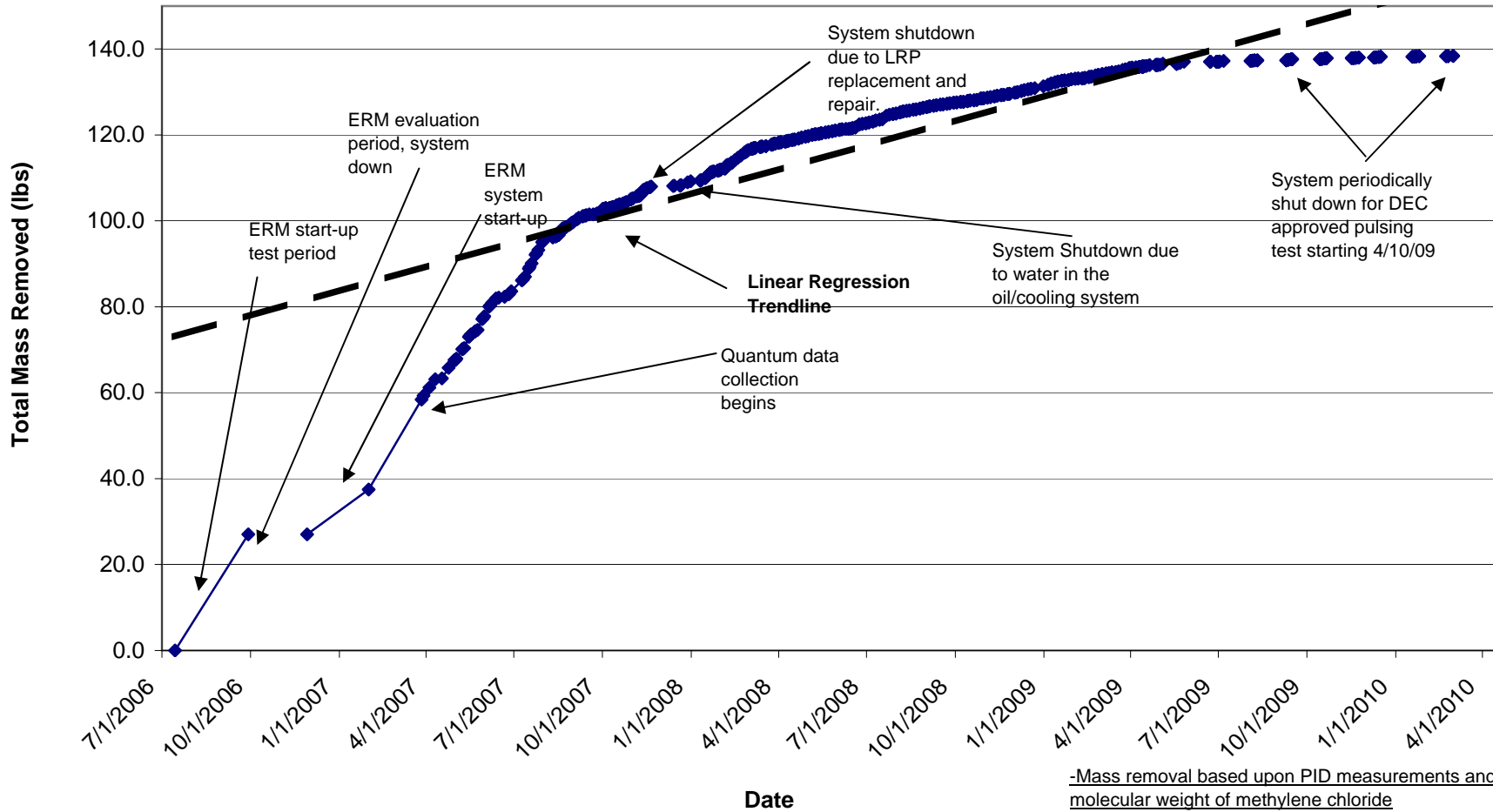
⁶Totalizer Flow readings collected from newly installed totalizer beginning October 2, 2007.

TABLE 2 - RECOVERY WELL ROTATION DATA
MCA REMEDIATION SYSTEM
755 JEFFERSON ROAD, HENRIETTA, NEW YORK
NYSDEC VCP NUMBER V00126-8
February 2010

Date	Well Rotation Clusters								
	EXSB-2	MW-D8	MW -21	MW-22	MW-20A	MW-20B	RW-6	RW-5	RW-4
February 1-21	System shut down as part of NYSDEC approved pulsing program								
February 22-March 1		X						X	X

Figure 1
MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
February 2010

Total VOC Mass Removed (Vapor and Ground Water Combined)



-Mass removal based upon PID measurements and the molecular weight of methylene chloride
-Down time greater than 7 days identified on chart

Figure 2
MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
February 2010

Total VOC Mass Removal Rate (Vapor & Ground Water Combined)

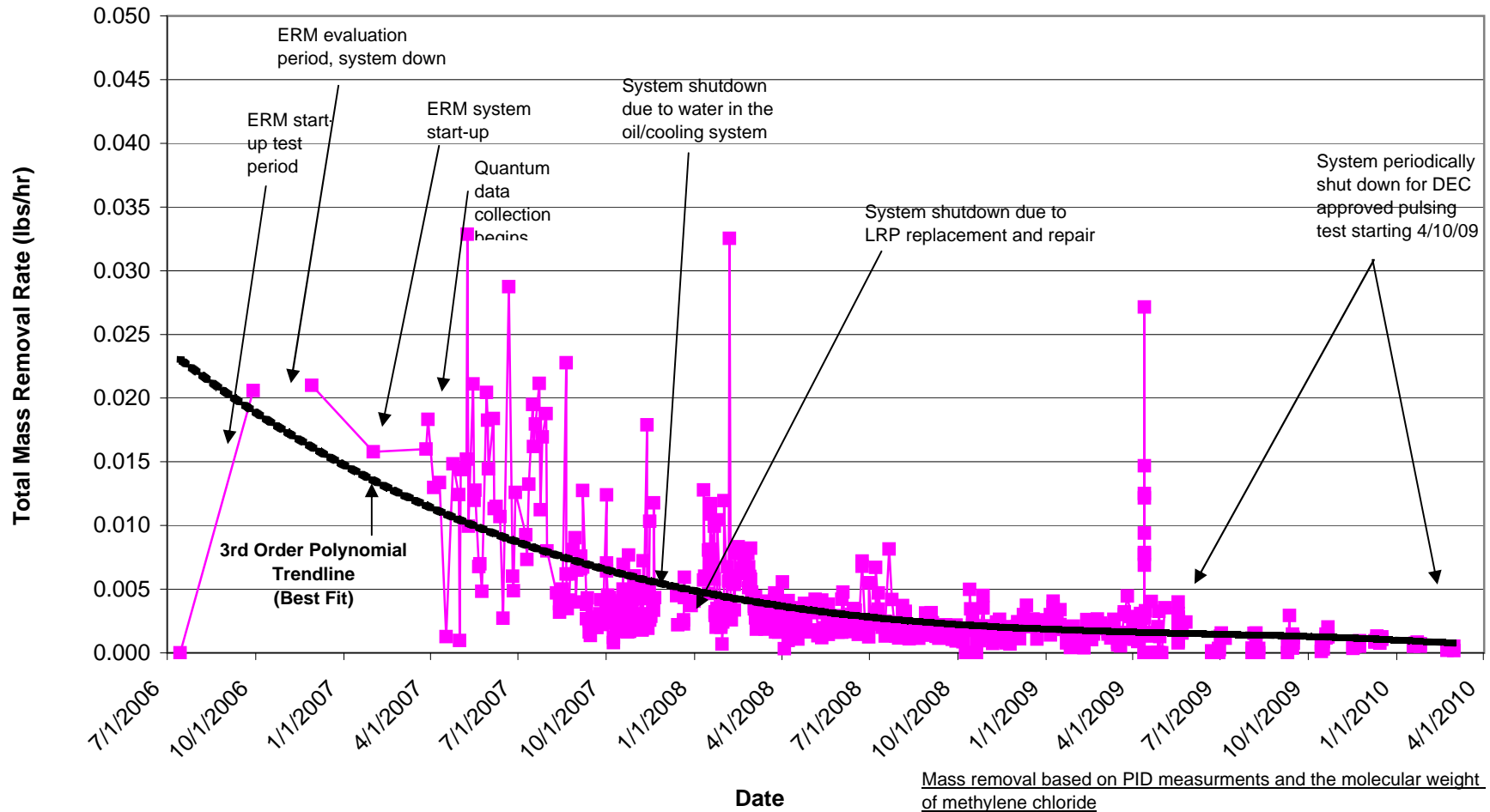


Figure 2A

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
February 2010

Total VOC Mass Removal Rate (Vapor & Ground Water Combined) Since February 2009

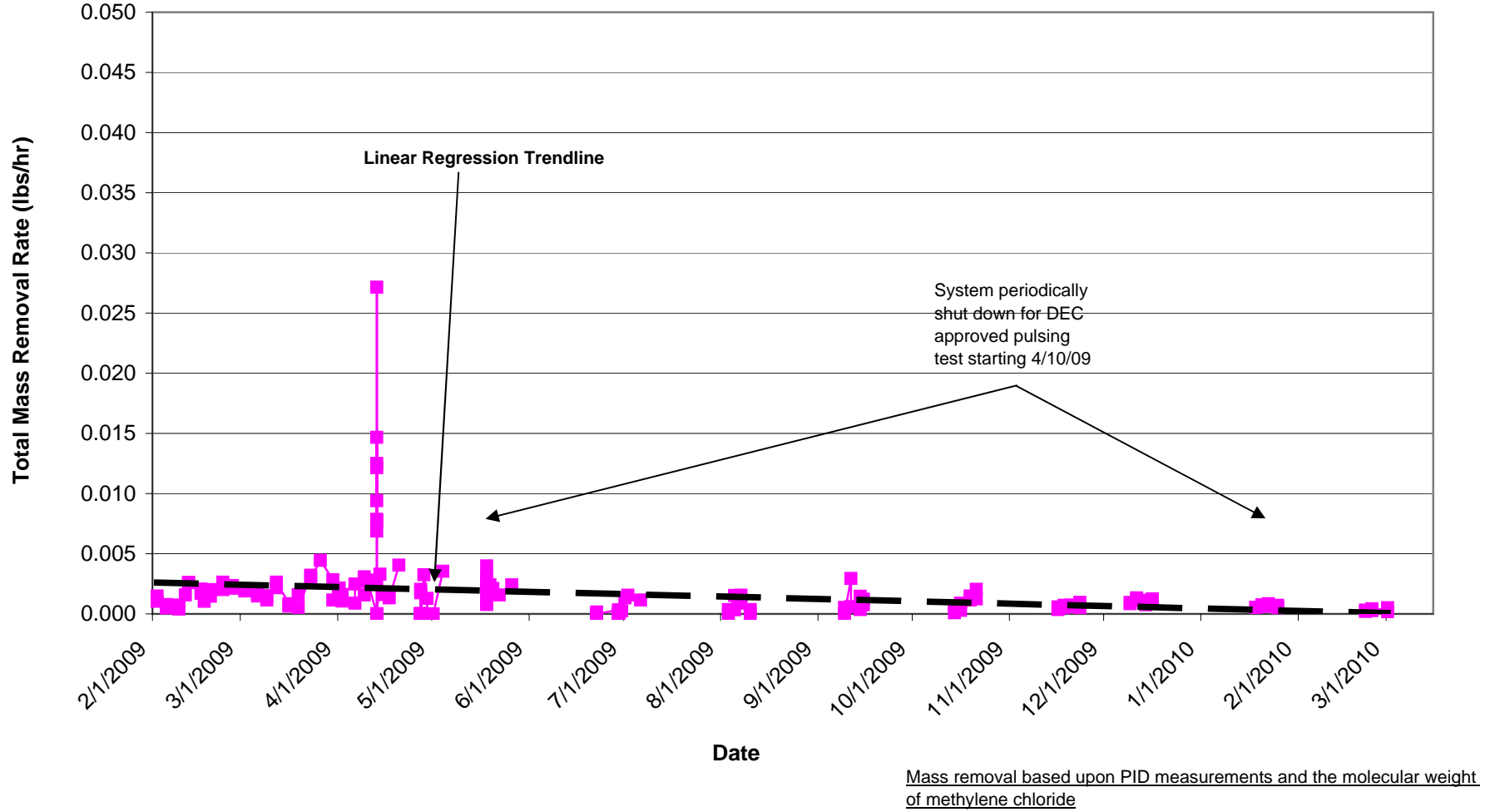


Figure 3

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
February 2010

Vapor Mass Removal Rate

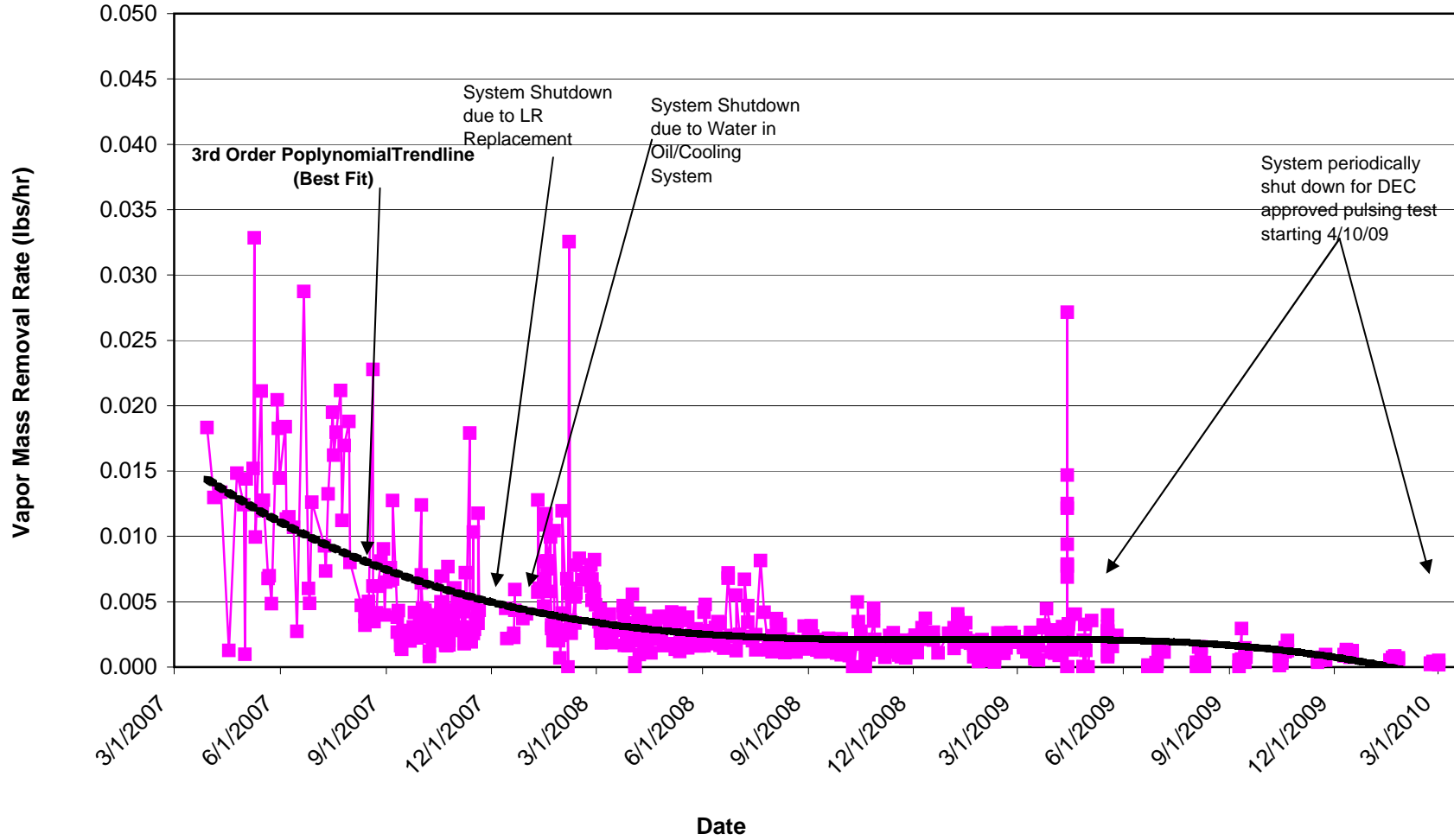


Figure 3A

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
February 2010

Vapor Mass Removal Rate Since February 2009

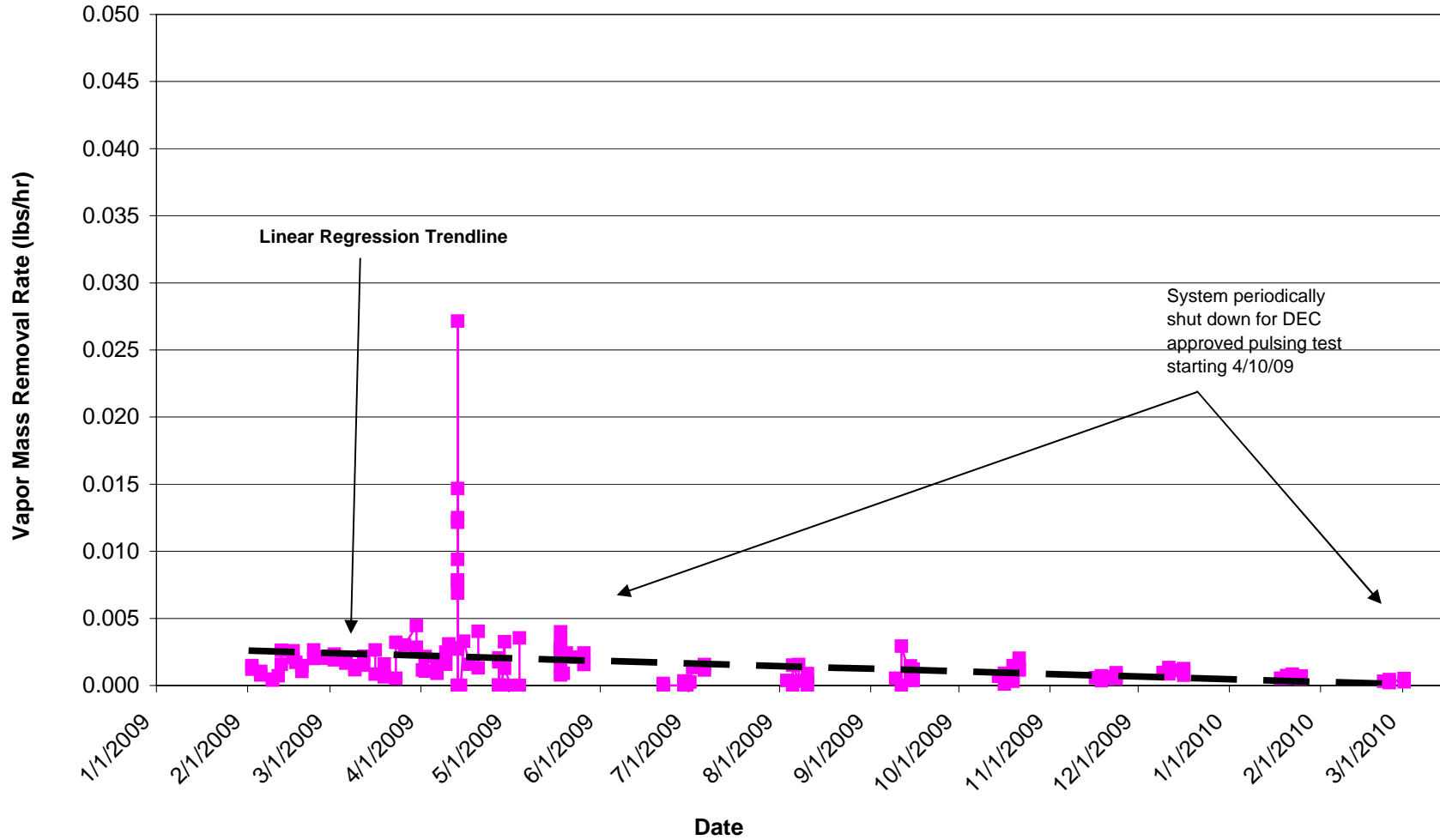
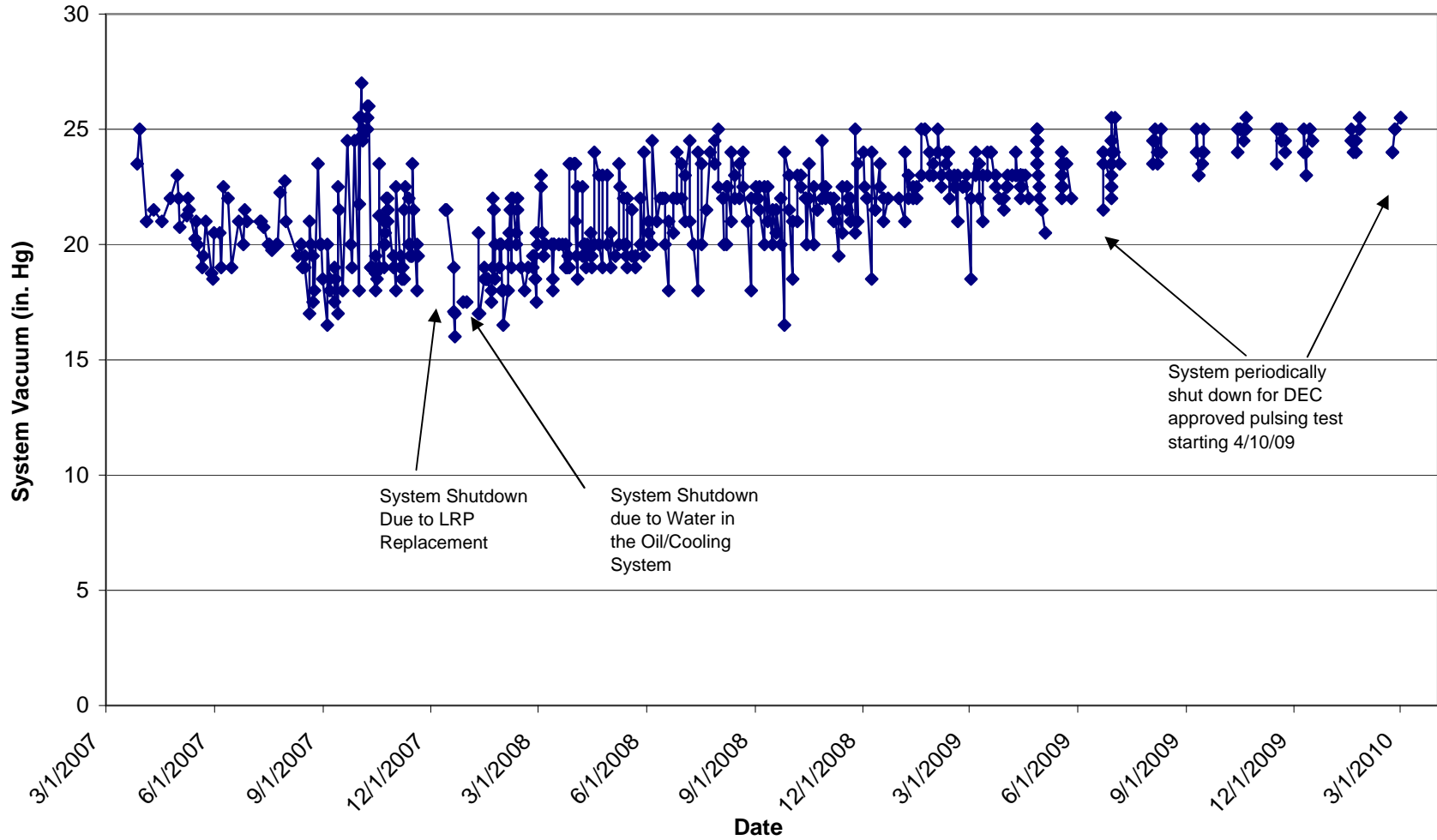


Figure 4

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
February 2010

System Vacuum



-Down time greater than 7 days identified on chart

Figure 5

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
February 2010

System Vapor Flow Rate

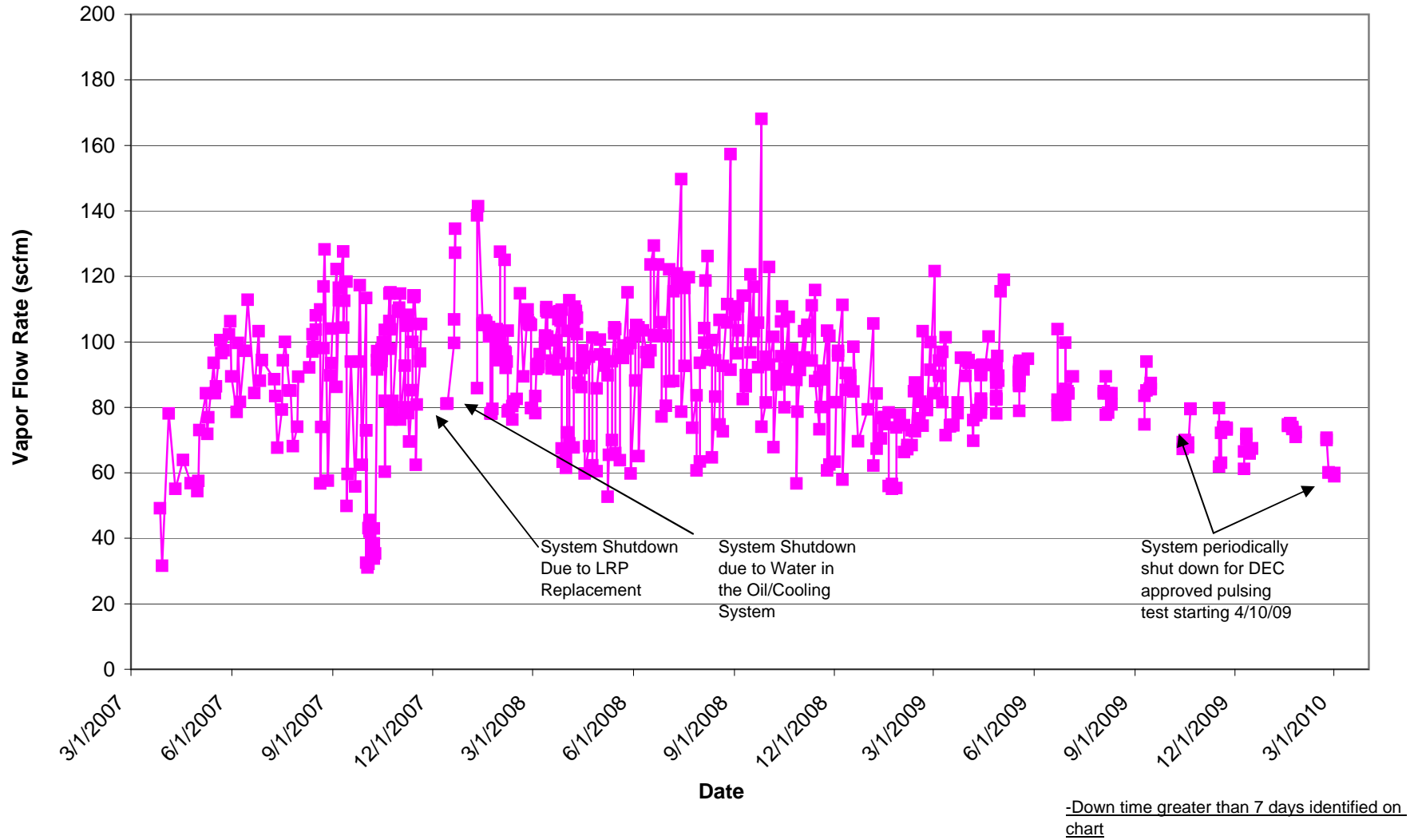


Figure 6

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
February 2010

Total MeCl Mass Removed (Ground Water)

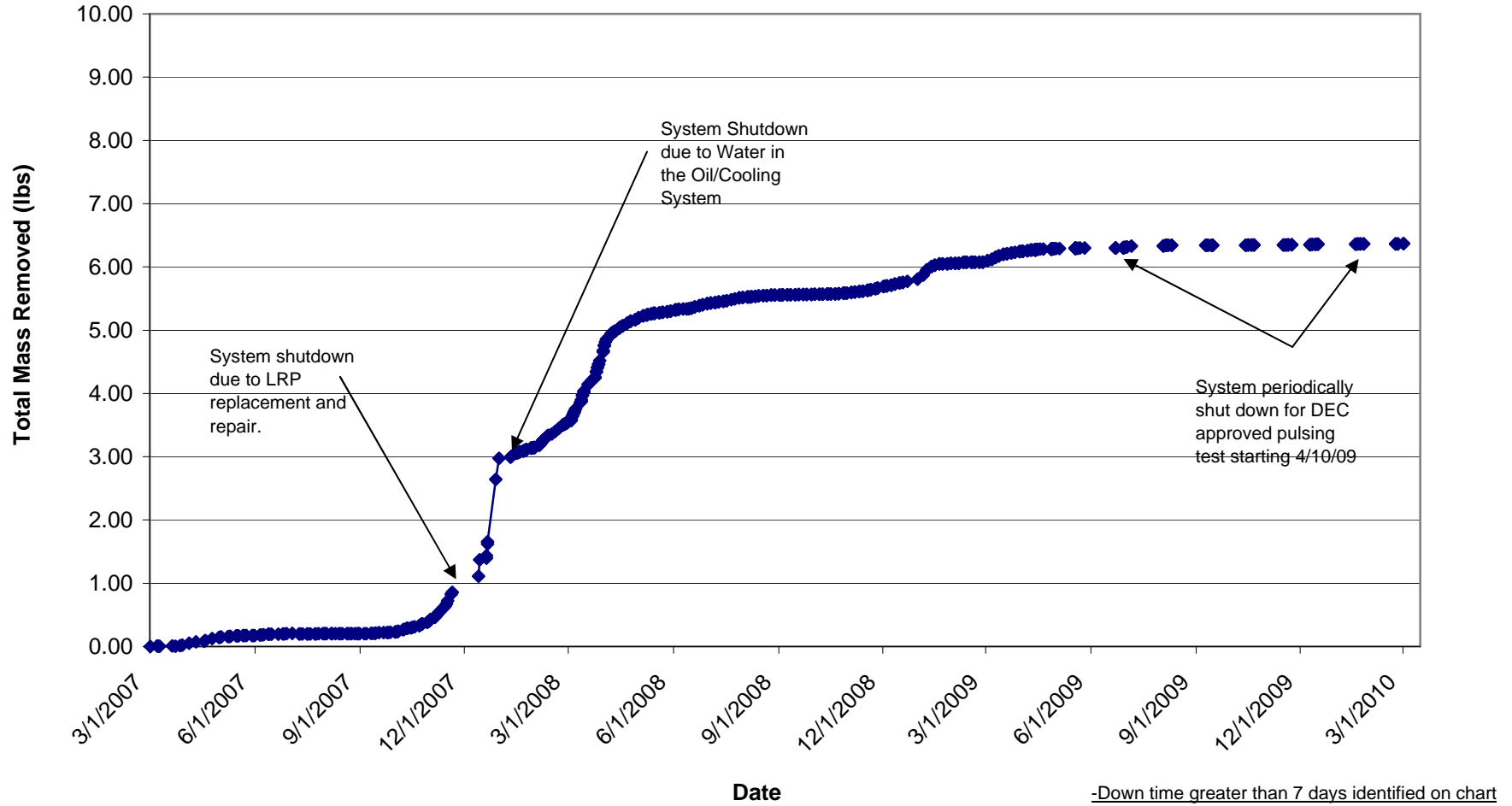
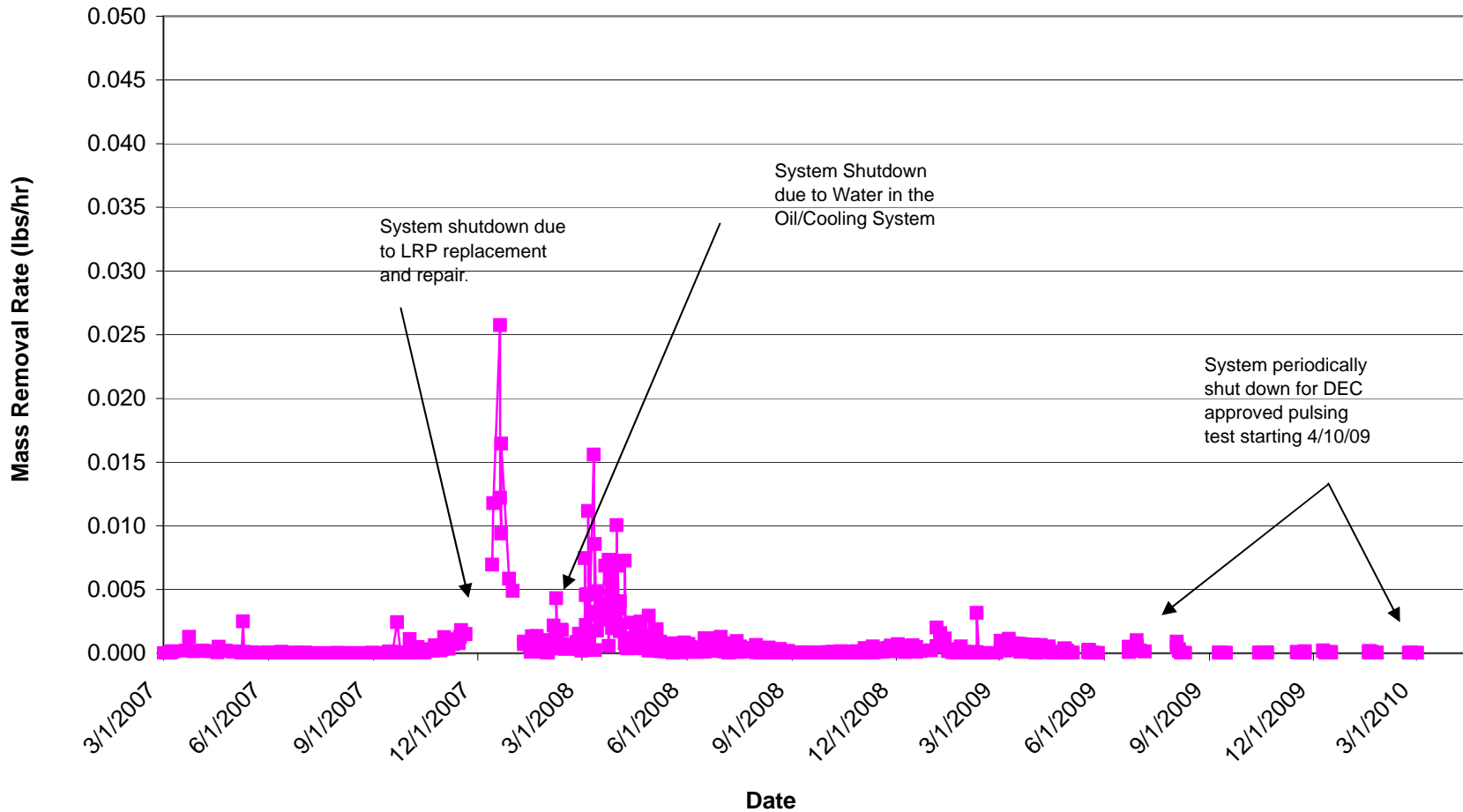


Figure 7
MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
February 2010

MeCl Mass Removal Rate (Ground Water)



-Down time greater than 7 days identified on chart

Figure 8

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
February 2010

Cumulative Ground Water Flow

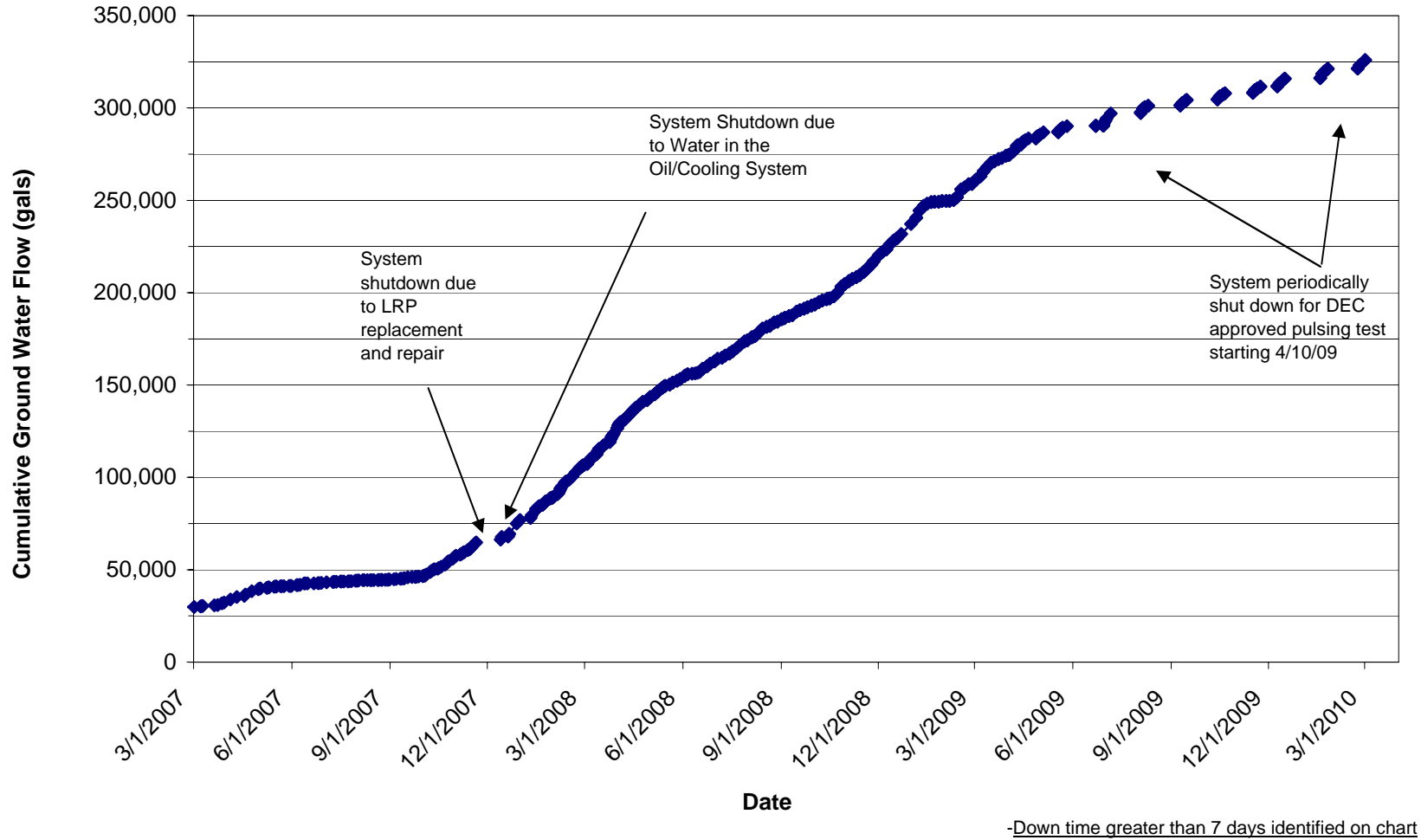
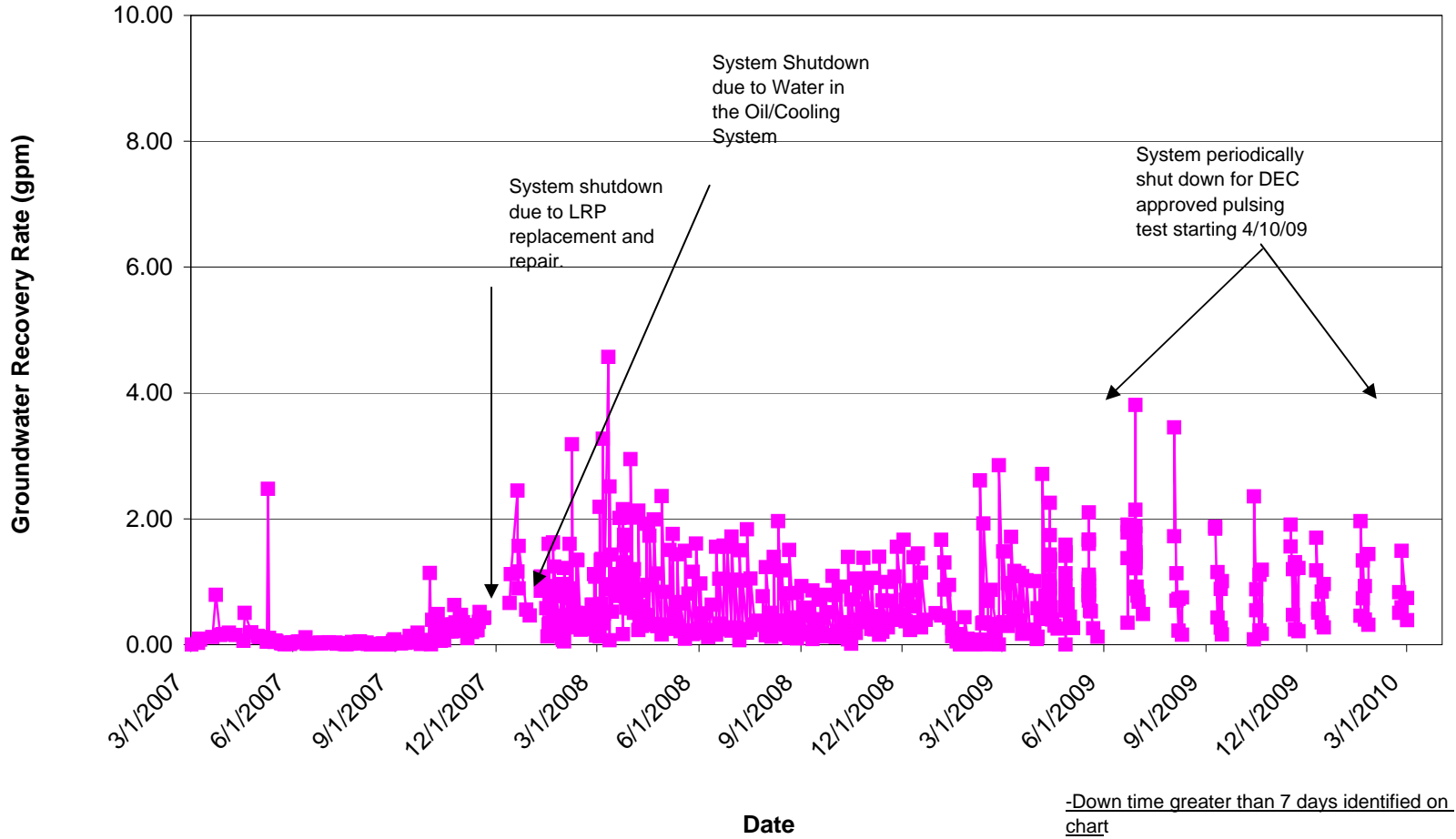


Figure 9

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
February 2010

Ground Water Recovery Rate



Volatile Analysis Report for Water

Client: Quantum Management Group

Client Job Site:	MPRS @ UCB Jefferson Rd.	Lab Project Number:	10-0828
Client Job Number:	N/A	Lab Sample Number:	3414
Field Location:	PreBT / Inf 1,2,3 Comp	Date Sampled:	03/01/2010
Field ID Number:	N/A	Date Received:	03/01/2010
Sample Type:	Water	Date Analyzed:	03/04/2010

Liquid Influent

Compounds	Results in ug / L
Acetone	ND< 25.0
Amyl Acetate	ND< 62.5
Benzene	ND< 1.75
2-Butanone	ND< 25.0
Carbon disulfide	ND< 12.5
Chloroform	ND< 5.00
Chloromethane	ND< 5.00
cis-1,2-Dichloroethene	ND< 5.00
Ethyl acetate	ND< 62.5
Isopropyl acetate	ND< 62.5
Methylene chloride	21.9
m,p-Xylene	ND< 5.00
o-Xylene	ND< 5.00

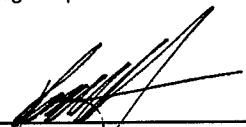
ELAP Number 10958

Method: EPA 624

Data File: V73373.D

Comments: ND denotes Non Detect
ug / L = microgram per Liter

Signature: _____


Bruce Hoogesteger: Technical Director

Volatile Analysis Report for Air

Client: Quantum Management Group

Client Job Site: MPRS @ UCB Jefferson Rd.	Lab Project Number: 10-0828	Lab Sample Number: 3415
Client Job Number: N/A	Date Sampled: 03/01/2010	Date Received: 03/01/2010
Field Location: SP-102 Tedlar Bag	Date Analyzed: 03/08/2010	
Field ID Number: N/A		
Sample Type: Air		

Influent Vapor

Compound	Results in PPBv	Results in ug / m3
Acetone	ND< 4,220	ND< 10,000
Benzene	ND< 627	ND< 2,000
2-Butanone	ND< 3,400	ND< 10,000
Carbon disulfide	ND< 643	ND< 2,000
Chloroform	ND< 414	ND< 2,000
Chloromethane	ND< 978	ND< 2,000
cis-1,2-Dichloroethene	ND< 509	ND< 2,000
Methylene chloride	ND< 1,460	ND< 5,000
m,p-Xylene	ND< 461	ND< 2,000
o-Xylene	ND< 461	ND< 2,000

ELAP Number 10958

 Method: EPA 8260B
 Modified for Tedlar Bag

Data File: V73434.D

Comments: ND denotes Non Detect
 PPBv = Parts per Billion volume
 ug / m3 - Microgram per cubic meter.

Signature: _____

Bruce Hoogesteger: Technical Director



April 9, 2010

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: Monthly Progress Report – March 2010
755 Jefferson Road Facility – Henrietta, New York
NYSDEC VCP Number V00126-8

***Key Actions
This Period:***

- **March 1 – March 31, 2010.** The system was intermittently operational in accordance with the NYSDEC approved pulsing plan.

Operations Metrics (March 22 – March 29)

- Operational Time: 170 out of a scheduled 170 hours of operation.
- Uptime Efficiency: 100%
- Volume of Groundwater Treated: 5,051 gallons.
 - Discharged to: The sanitary sewer system.
- Total estimated VOC mass recovered to date: 138.5 lbs.
- Total estimated VOC mass recovered during March: 0.11 lbs.
- Mean estimated VOC mass removal rate for March 2010 versus February 2010: 0.0007 versus 0.0005 lbs/hr.
- General weather conditions: Below average precipitation and average temperatures as compared to historical data.

Tables, Figures and Graphs

- Table 1: March Treated Waste Water Flow/Vapor Monitoring Data.
- Table 2: March Recovery Well Rotation Data.
- Figures 1-9: Remedial Effectiveness and Efficiency Platform (REEP) graphs
- Figures 2A and 3A: Selected Remedial Effectiveness and Efficiency Platform (REEP) graphs showing results from March 2009 to present.

***Problems/
Resolutions:***

- None

***Analytical Data
Received:***

- The March 2010 MPRS liquid influent analytical data.
- The March 2010 MPRS liquid effluent analytical data.
- The March 2010 MPRS vapor influent analytical data.

***Documents
Submitted:***

- Monthly Progress Report for February 2010 dated March 9, 2010.

**Anticipated
Actions –
April
2010:**

- Continue NYSDEC approved pulsing program until permission is granted to terminate system operation.

Comments:

- The attached REEP information is to be utilized as a subjective representation of the overall effectiveness/performance of the system as we are using discontinuous data and PID measurements for the removal calculations. We do not intend this tool as a definitive summary of recovered mass.
- MPRS operation and efficiency, inclusive of the replacement LRP pump and associated upgrades and maintenance, will continue to be monitored.
- Submittal of the Post Remedial Construction OM&M FER, Closure Request and Certification and revised Site Management Plan is anticipated in April 2010.

**NYSDEC-
Approved Field
Decisions:**

- Continuation of pulsing of MPRS system in accordance with the procedure presented to NYSDEC.

If you have any questions regarding this monthly report or progress on the project, please don't hesitate to contact me at 513-314-7543 or rbethel@qmg-inc.com.

Sincerely,
QUANTUM MANAGEMENT GROUP, INC.



Rick Bethel
Senior Associate

Attachments

cc:

Mr. Jeffrey M. Kosmala, P.E. (MCDOH)
Mr. Michael Bogdan (Sanofi-Aventis)
Mr. Richard Ricci (Lowenstein Sandler PC)
Mr. Mark Byrne, P.E. (Town of Henrietta)
Ms. Libby Ford, (Nixon Peabody)
Mr. Greg Light (UCB)
Mr. George Hollerbach, P.E. (Quantum)

Ms. Melissa Menetti (NYSDOH)
Mr. David Panipinto (UCB)
Mr. Bart Putzig, P.E. (NYSDEC)
Mr. Sean Keenan (MCDES)
Mr. John Lang, P.E. (Quantum)

TABLE 1 - TREATED WASTE WATER FLOW/VAPOR MONITORING DATA
MCA REMEDIATION SYSTEM
755 JEFFERSON ROAD, HENRIETTA, NEW YORK
NYSDEC VCP NUMBER V00126-8
March 2010

Date	Time¹	Cumulative Hours²	Total Flow³ Gallons	Flow Rate⁴ Gal/Min	Cumulative Gallons^{5,6}	Influent PID (ppm)	Effluent PID (ppm)
3/1/2010	11:19	39930.4	90	0.7	325,967	0.2	0.0
3/22/2010	9:35	39930.8	49	1.8	326,016	1.1	0.3
3/22/2010	11:23	39932.6	221	2.1	326,237	0.3	0.0
3/24/2010	9:27	39978.7	2,172	0.8	328,409	0.8	0.0
3/24/2010	11:25	39980.7	159	1.3	328,568	0.1	0.0
3/26/2010	9:18	40026.5	1,033	0.4	329,601	0.8	0.0
3/26/2010	11:21	40028.7	164	1.3	329,765	0.4	0.0
3/29/2010	9:23	40098.6	1,083	0.3	330,848	0.5	0.0
3/29/2010	11:22	40100.6	170	1.4	331,018	0.1	0.0

¹Time of day (in military time) data was collected.

²Cumulative Hours represents the number of run-hours since MCA remediation system start-up on 12 July 2006.

³Total Flow in Gallons represents the flow that occurred since the time the last measurement was collected, as indicated in the previous row of the table.

⁴Flow Rate in Gallons/Minute represents the average flow rate since the time the last measurement was collected, as indicated in the previous row of the

⁵Cumulative Gallons represents the number of gallons of water treated by the MCA remediation system since start-up on 12 July 2006.

⁶Totalizer Flow readings collected from newly installed totalizer beginning October 2, 2007.

TABLE 2 - RECOVERY WELL ROTATION DATA
MCA REMEDIATION SYSTEM
755 JEFFERSON ROAD, HENRIETTA, NEW YORK
NYSDEC VCP NUMBER V00126-8
March 2010

Date	Well Rotation Clusters								
	EXSB-2	MW-D8	MW -21	MW-22	MW-20A	MW-20B	RW-6	RW-5	RW-4
March 1-21	System shut down as part of NYSDEC approved pulsing program								
March 22-March 29		X						X	X

Figure 1
MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
March 2010

Total VOC Mass Removed (Vapor and Ground Water Combined)

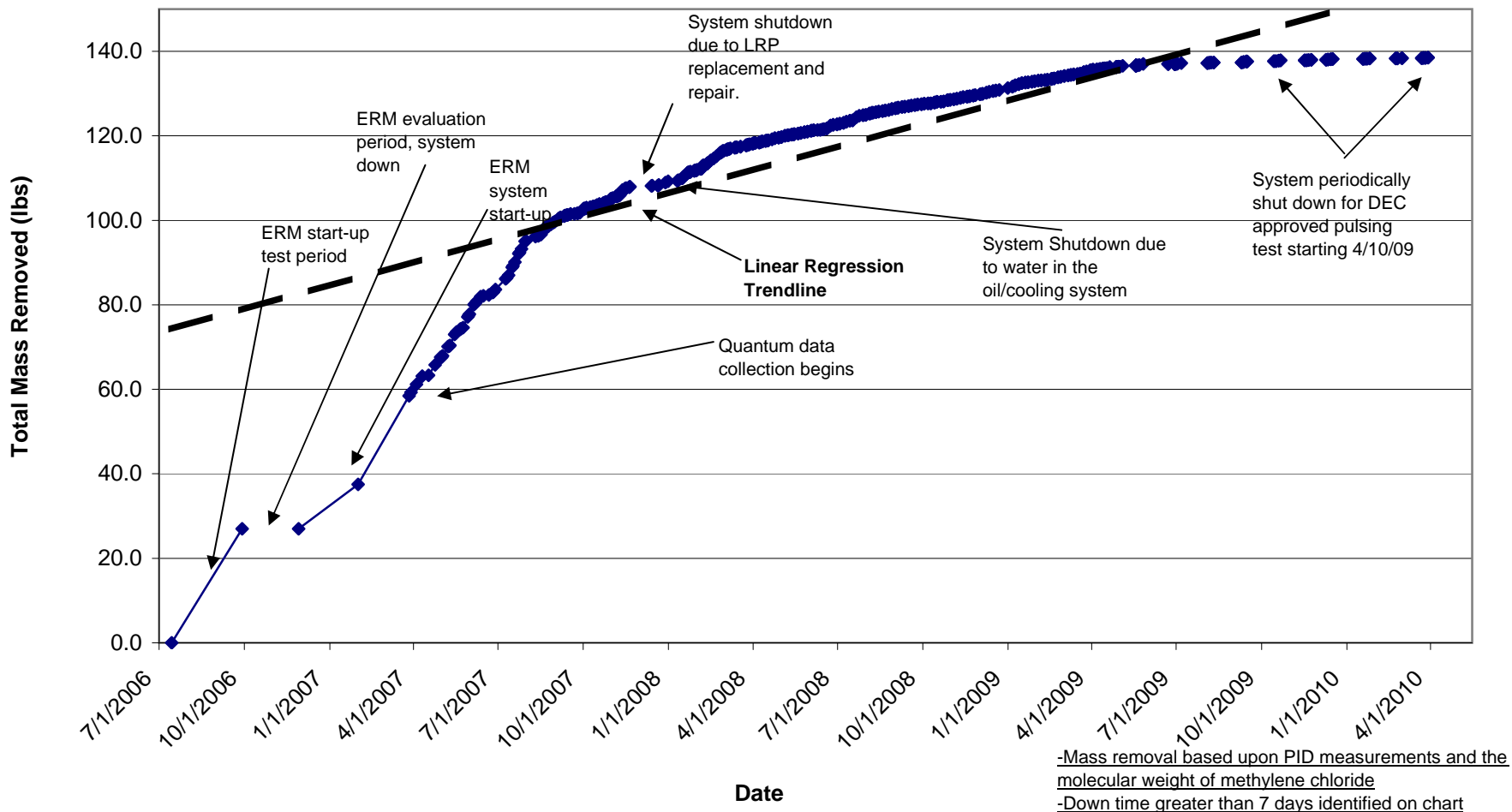


Figure 2
MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
March 2010

Total VOC Mass Removal Rate (Vapor & Ground Water Combined)

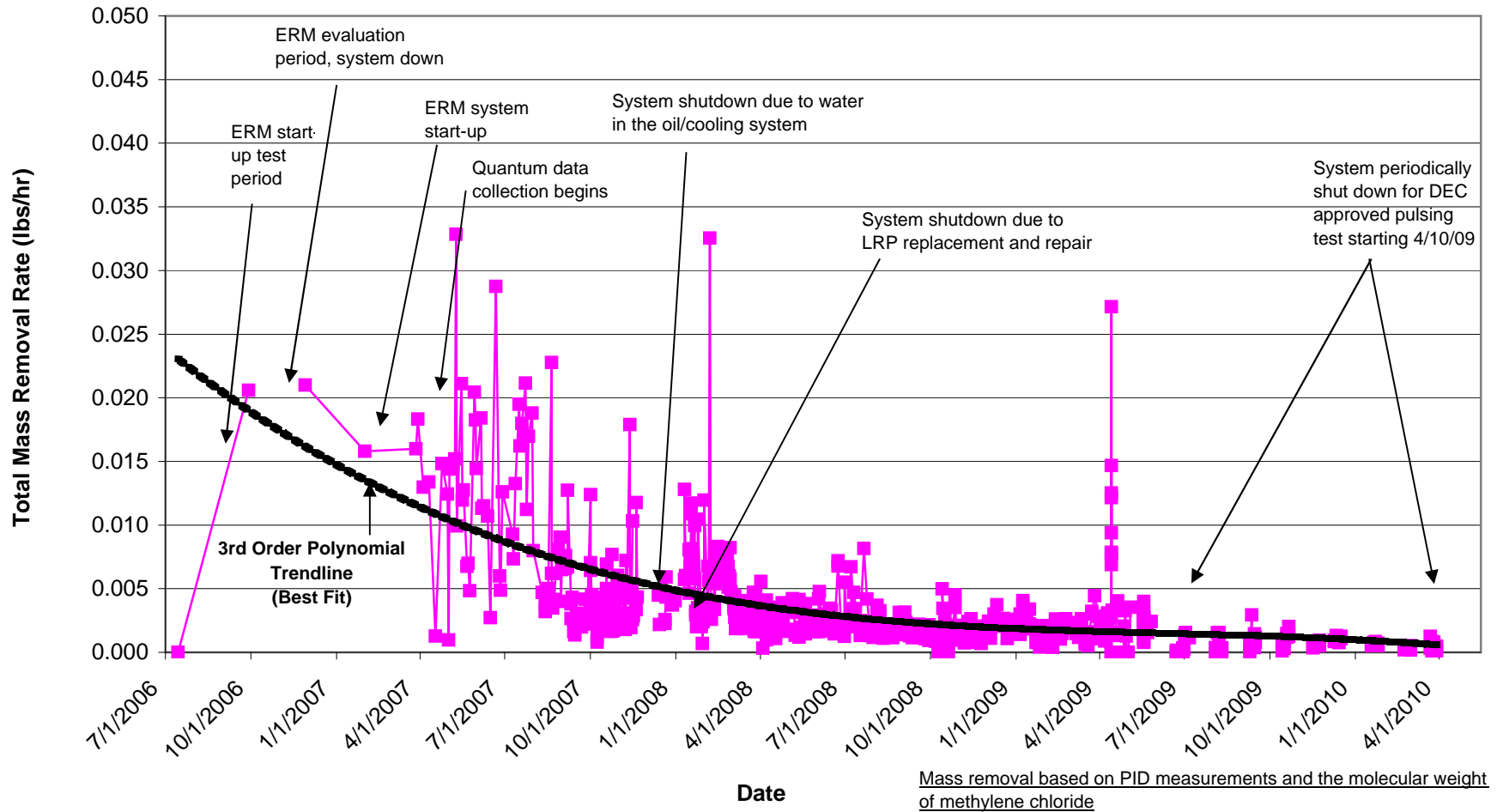


Figure 2A

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
March 2010

Total VOC Mass Removal Rate (Vapor & Ground Water Combined) Since March 2009

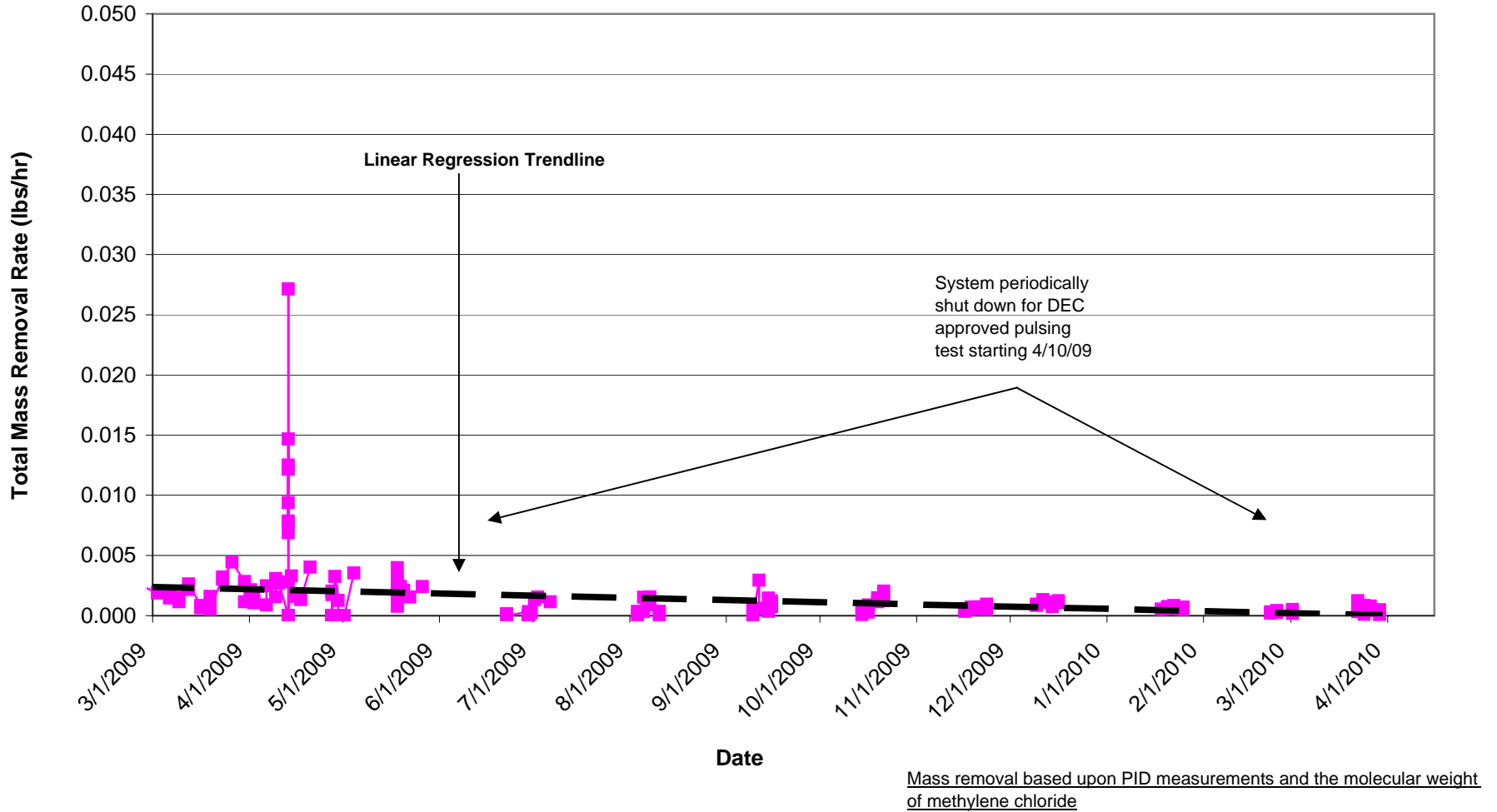


Figure 3

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
March 2010

Vapor Mass Removal Rate

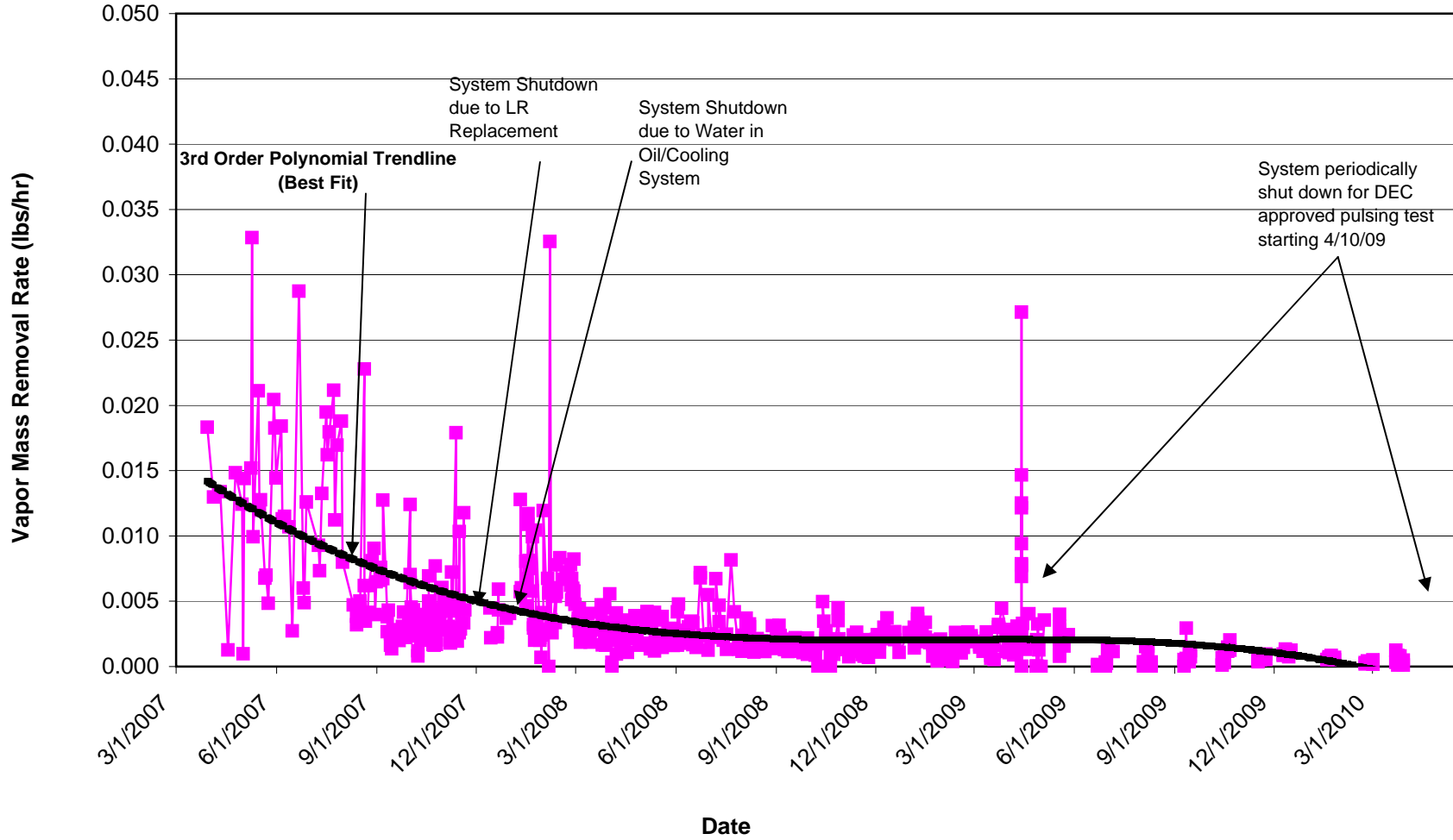


Figure 3A

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
March 2010

Vapor Mass Removal Rate Since March 2009

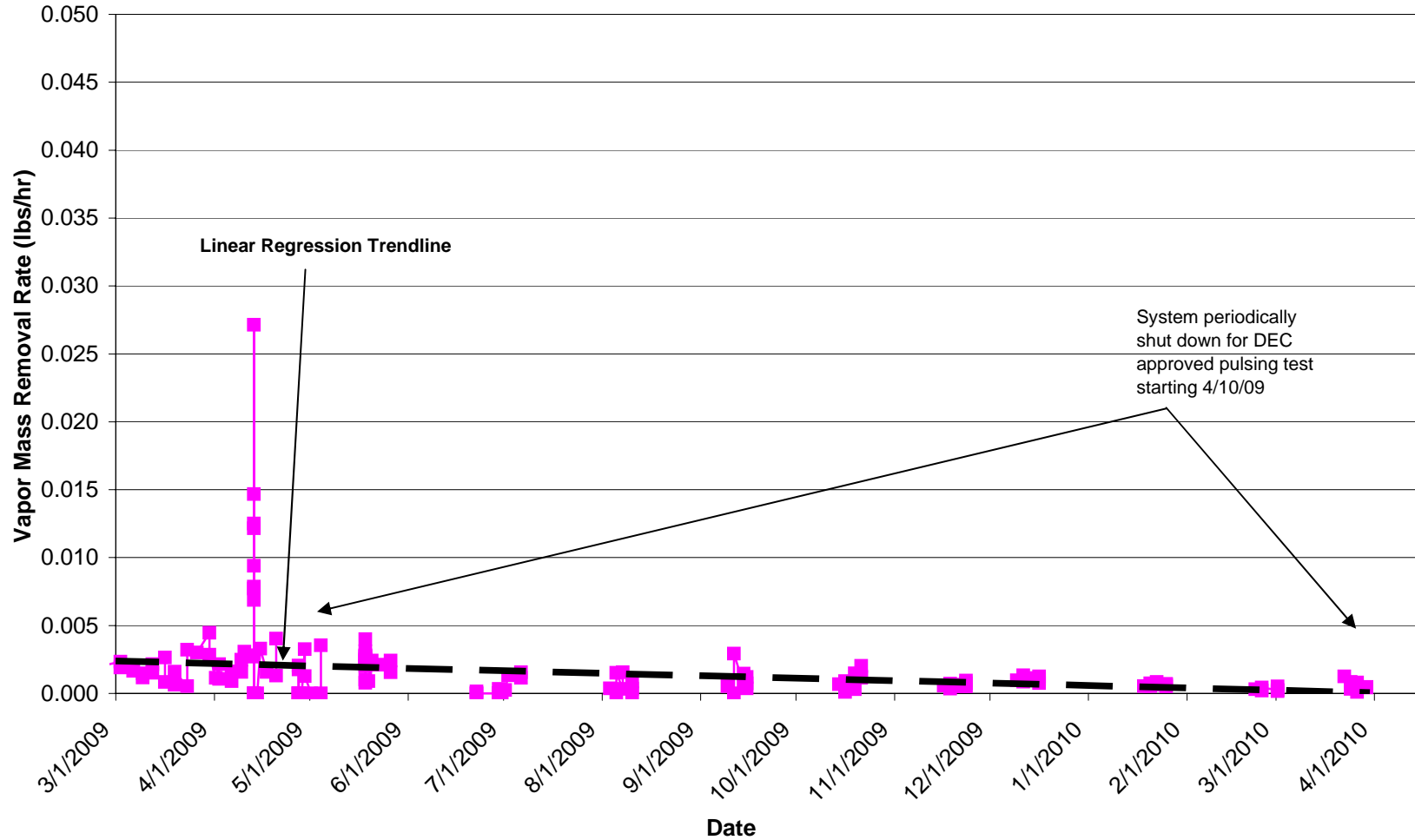


Figure 4

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
March 2010

System Vacuum

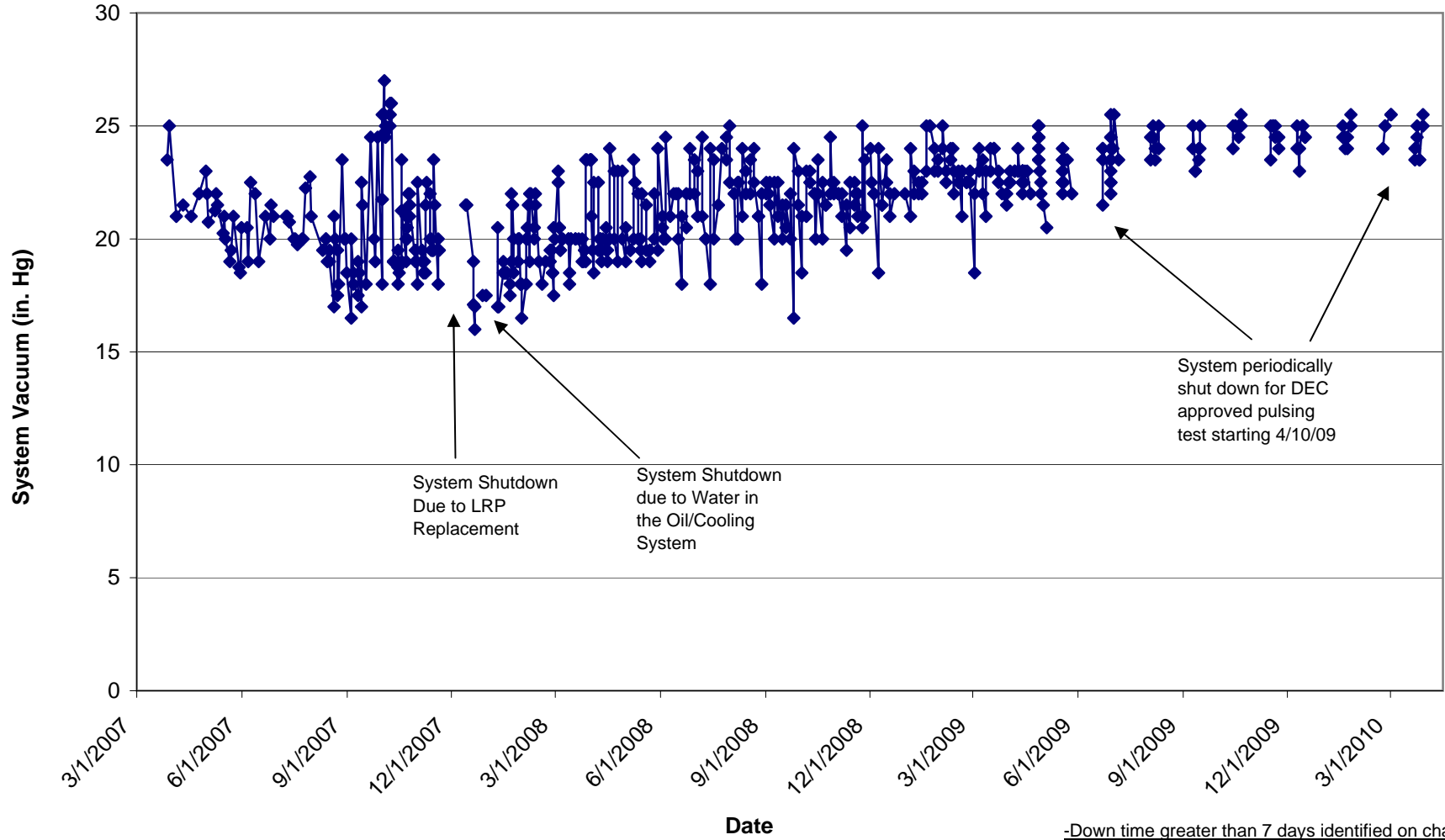
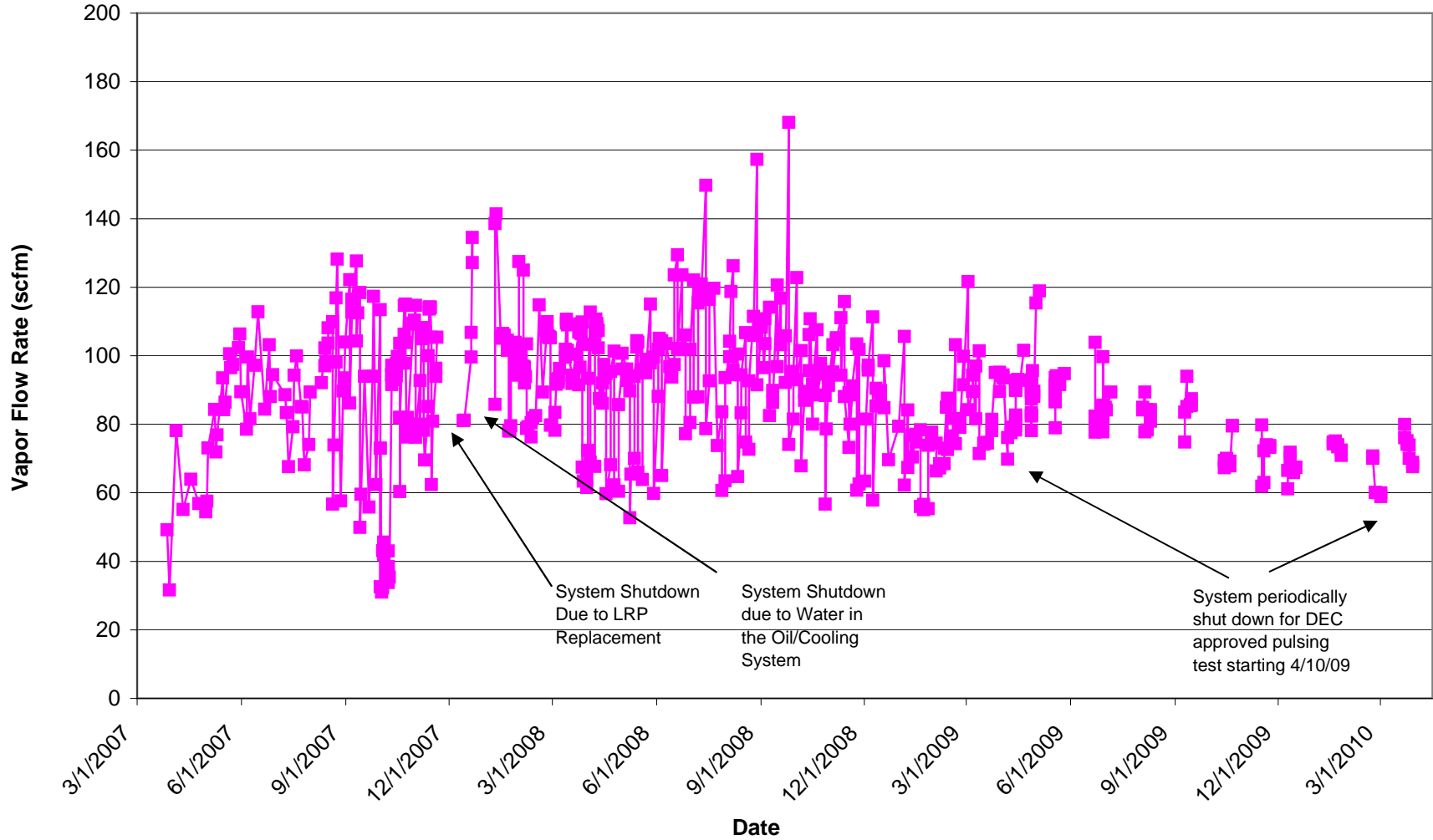


Figure 5

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
March 2010

System Vapor Flow Rate



System Shutdown
Due to LRP
Replacement

System Shutdown
due to Water in
the Oil/Cooling
System

System periodically
shut down for DEC
approved pulsing
test starting 4/10/09

-Down time greater than 7 days identified on
chart

Figure 6

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
March 2010

Total MeCl Mass Removed (Ground Water)

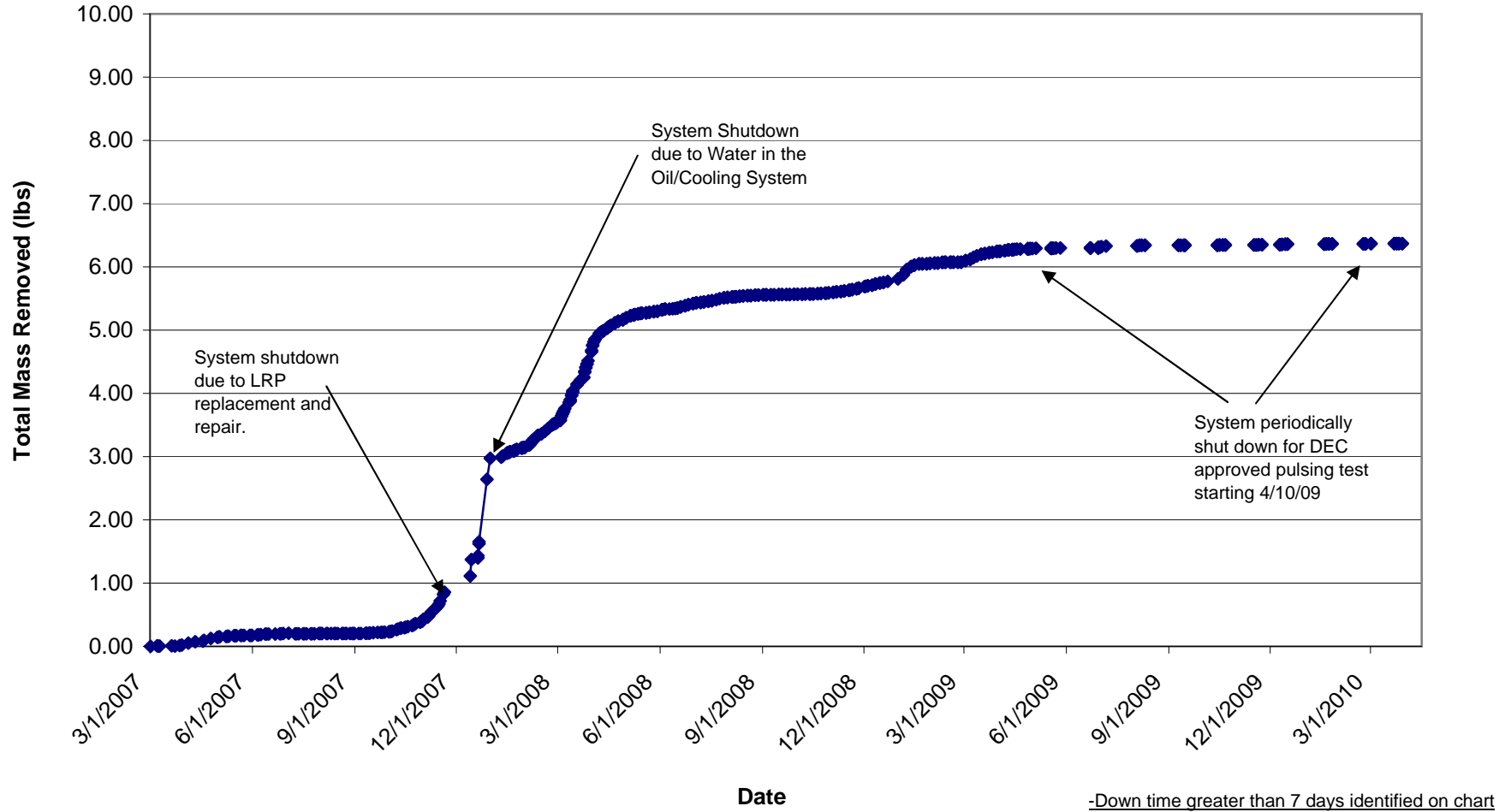


Figure 7

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
March 2010

MeCl Mass Removal Rate (Ground Water)

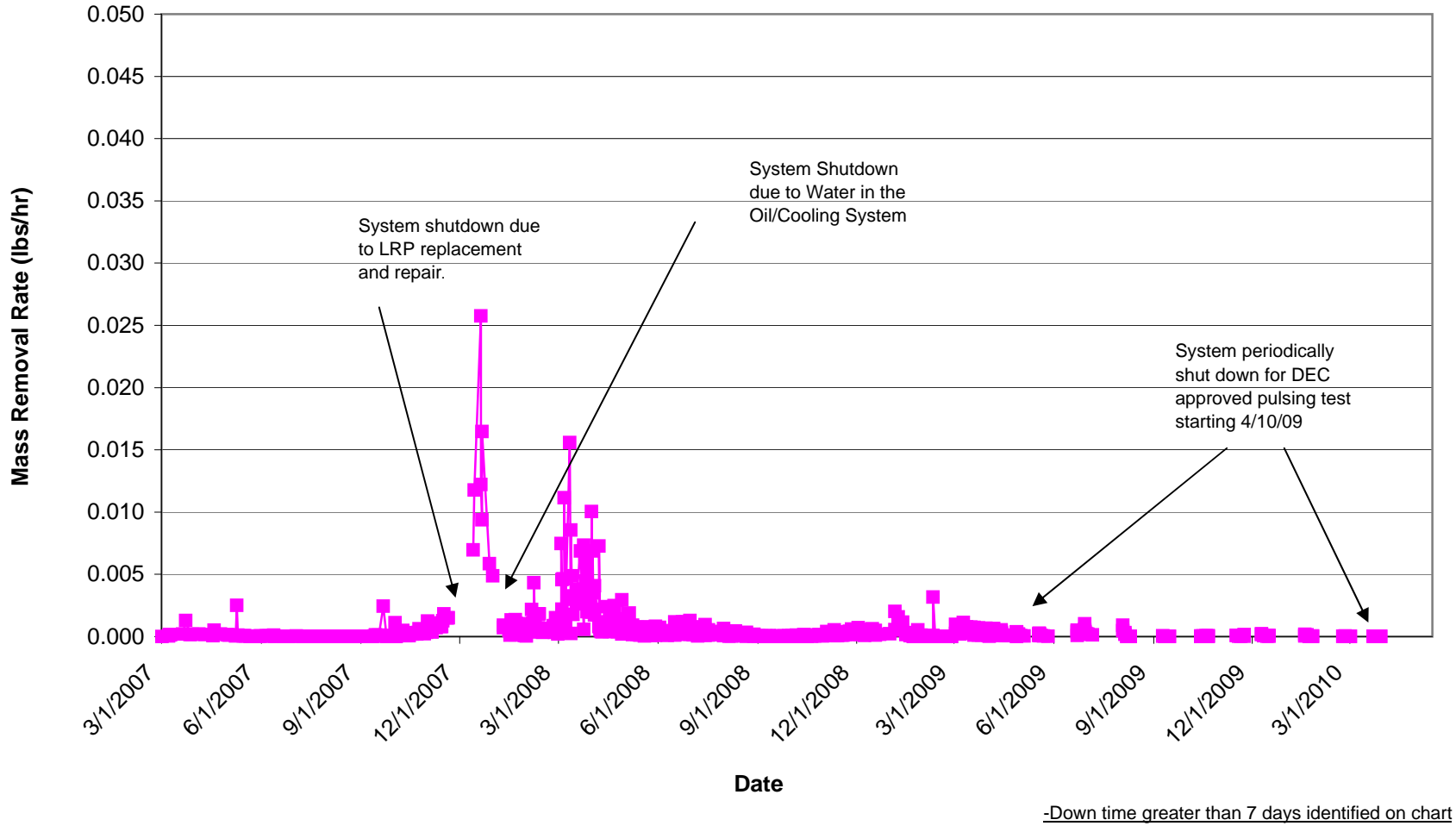
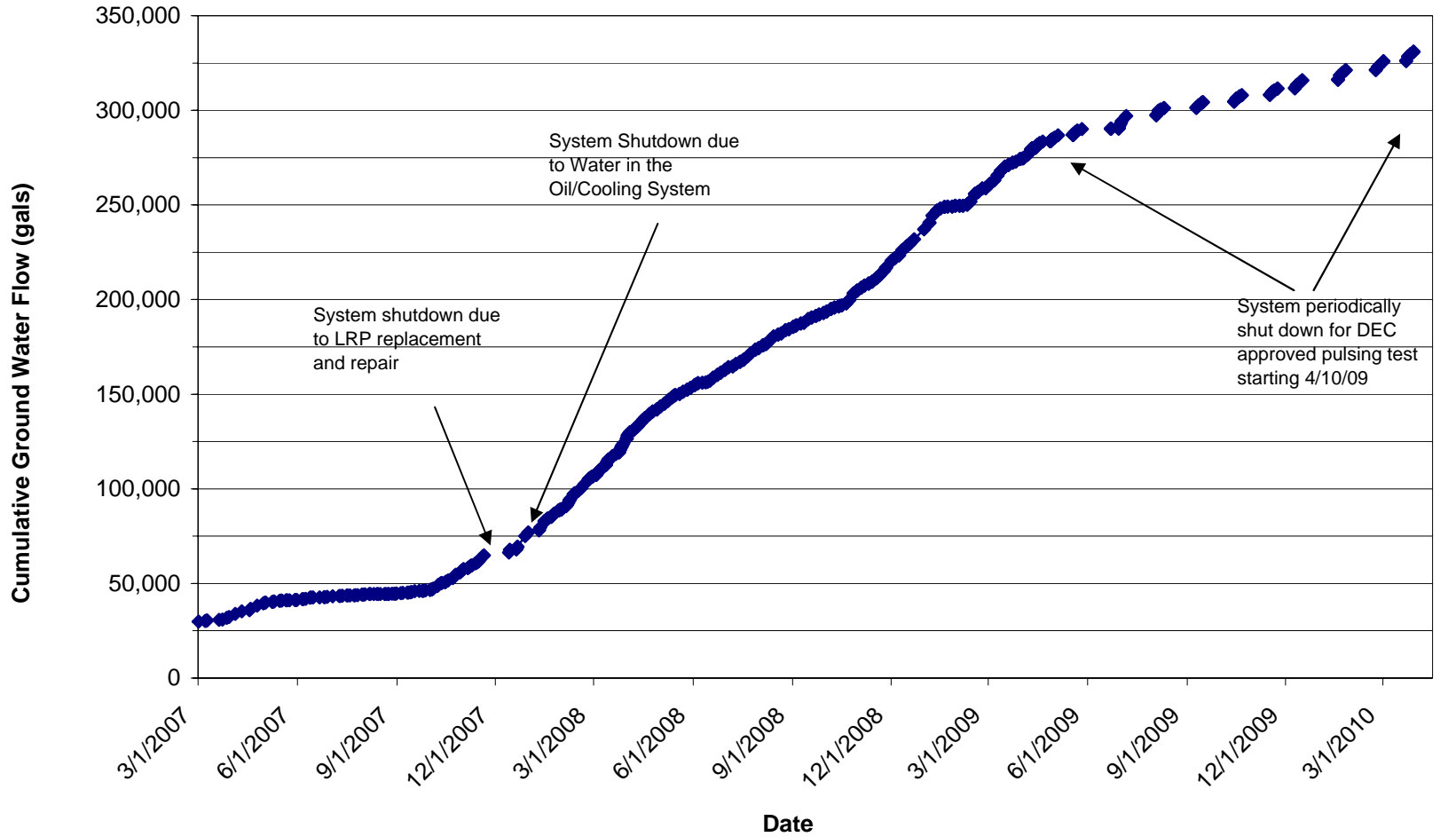


Figure 8

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
March 2010

Cumulative Ground Water Flow

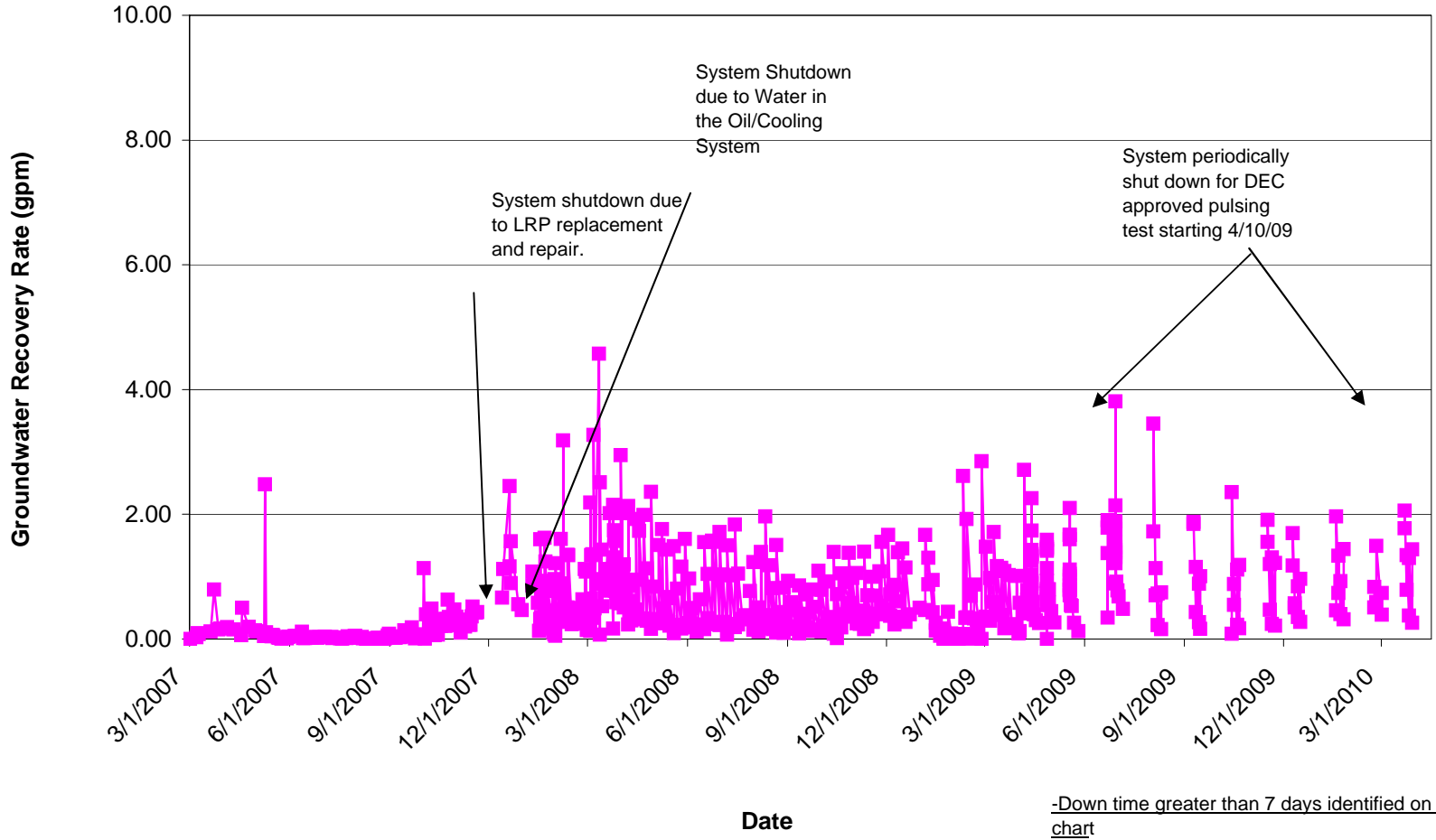


-Down time greater than 7 days identified on chart

Figure 9

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
March 2010

Ground Water Recovery Rate



Volatile Analysis Report for Water

Client: Quantum Management Group

Client Job Site:	MPRS @ UCB Jefferson Rd.	Lab Project Number:	10-1150
		Lab Sample Number:	4391
Client Job Number:	N/A	Date Sampled:	03/24/2010
Field Location:	PreBT / Inf 1,2,3 Comp	Date Received:	03/24/2010
Field ID Number:	N/A	Date Analyzed:	03/30/2010
Sample Type:	Water		

Liquid Influent

Compounds	Results in ug / L
Acetone	ND< 25.0
Amyl Acetate	ND< 62.5
Benzene	ND< 1.75
2-Butanone	ND< 25.0
Carbon disulfide	ND< 12.5
Chloroform	ND< 5.00
Chloromethane	ND< 5.00
cis-1,2-Dichloroethene	ND< 5.00
Ethyl acetate	ND< 62.5
Isopropyl acetate	ND< 62.5
Methylene chloride	16.8
m,p-Xylene	ND< 5.00
o-Xylene	ND< 5.00

ELAP Number 10958

Method: EPA 624

Data File: V73929.D

Comments: ND denotes Non Detect
ug / L = microgram per Liter

Signature: _____

Bruce Hoogestege, Technical Director

Volatile Analysis Report for Water

Client: Quantum Management Group

Client Job Site:	MPRS @ UCB Jefferson Rd.	Lab Project Number:	10-1150
		Lab Sample Number:	4392
Client Job Number:	N/A	Date Sampled:	03/24/2010
Field Location:	SP-302 / Eff 1,2,3 Comp	Date Received:	03/24/2010
Field ID Number:	N/A	Date Analyzed:	03/30/2010
Sample Type:	Water		

Liquid Effluent

Compounds	Results in ug / L
Acetone	ND< 10.0
Amyl Acetate	ND< 25.0
Benzene	ND< 0.700
2-Butanone	ND< 10.0
Carbon disulfide	ND< 5.00
Chloroform	ND< 2.00
Chloromethane	ND< 2.00
cis-1,2-Dichloroethene	ND< 2.00
Ethyl acetate	ND< 25.0
Isopropyl acetate	ND< 25.0
Methylene chloride	ND< 5.00
m,p-Xylene	ND< 2.00
o-Xylene	ND< 2.00

ELAP Number 10958

Method: EPA 624

Data File: V73930.D

Comments: ND denotes Non Detect
ug / L = microgram per Liter

Signature: _____

Bruce Hoogesteger, Technical Director



Volatile Analysis Report for Air

Client: Quantum Management Group

Client Job Site:	MPRS @ UCB Jefferson Rd.	Lab Project Number:	10-1150
		Lab Sample Number:	4393
Client Job Number:	N/A	Date Sampled:	03/24/2010
Field Location:	SP-102 Tedlar Bag	Date Received:	03/24/2010
Field ID Number:	N/A	Date Analyzed:	03/31/2010
Sample Type:	Air		

Vapor Influent

Compound	Results in PPBv	Results in ug / m3
Acetone	ND< 4,220	ND< 10,000
Benzene	ND< 627	ND< 2,000
2-Butanone	ND< 3,400	ND< 10,000
Carbon disulfide	ND< 643	ND< 2,000
Chloroform	ND< 414	ND< 2,000
Chloromethane	ND< 978	ND< 2,000
cis-1,2-Dichloroethene	ND< 509	ND< 2,000
Methylene chloride	ND< 1,460	ND< 5,000
m,p-Xylene	ND< 461	ND< 2,000
o-Xylene	ND< 461	ND< 2,000

ELAP Number 10958

Method: EPA 8260B
Modified for Tedlar Bag

Data File: V73961.D

Comments: ND denotes Non Detect
PPBv = Parts per Billion volume
ug / m3 - Microgram per cubic meter.

Signature:


Bruce Hoogesteger: Technical Director



March 9, 2010

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: Fourth Quarter 2009 Environmental Effectiveness Monitoring Report
UCB Manufacturing Inc.
755 Jefferson Road Facility – Henrietta, New York
NYSDEC VCP Number: V00126-8


Dear Mr. MacLean:

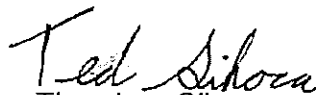
On behalf of UCB Manufacturing Inc. (UCB), please find enclosed the Quarterly Environmental Effectiveness Monitoring Report for the above-referenced Site for the Fourth Quarter of 2009 covering the time period from October 1, 2009 through December 31, 2009. This report is being submitted in accordance with the requirements described in Section 6.2 of the Draft Operation, Maintenance & Monitoring (OM&M) Plan.

Between December 16 and 18, 2009, Kleinfelder East, Inc. completed quarterly liquid gauging and ground water sampling at the Site pursuant to Section 4.3 of the Draft OM&M Plan. Groundwater quality analytical results are summarized on Table 1. The Multi-Phase Remedial System (MPRS) continues to operate on a pulsed schedule of one week of operation and four weeks of shut down time.

If you require additional information or clarification, please contact the undersigned at (845) 567-6530 or Rick Bethel of Quantum Management Group, Inc. at (513) 314-7543.

Sincerely,
Kleinfelder East, Inc.


Alexander Wirth
Senior Project Geologist


Theodore Sikora
Project Geologist

Enclosure

Cc: Rick Bethel – Quantum Management Group, Inc.
John Lang – Quantum Management Group, Inc.
Michael Bogdan – Sanofi Aventis
Richard Ricci – Lowenstein Sandler PC
Jean McCreary – Nixon Peabody
Libby Ford – Nixon Peabody

755 Jefferson Road Site, Henrietta, NY
QUARTERLY ENVIRONMENTAL EFFECTIVENESS MONITORING REPORT

Site Address: Jefferson Road Facility	Regulatory Agency: NYSDEC – Region 8
755 Jefferson Road	Regulatory Contact: Gregory B. MacLean, P.E.
Rochester, New York	Consultant: Quantum Management Inc. (QMG), Kleinfelder East, Inc. (Kleinfelder)
NYSDEC VCP No.: V00126-8	Project Managers / Project Geologists: Rick Bethel (QMG), Alexander Wirth
UCB Contact: Greg Light	

Report Date: March 9, 2010.

Current Site Status: Active pharmaceutical manufacturing facility.

Monitoring Period: Fourth quarter 2009
(October 1 through December 31).

Work Performed: Quarterly environmental effectiveness monitoring pursuant to Section 4.3 of the Draft OM&M plan submitted to New York State Department of Environmental Conservation (NYSDEC) in May 2007 and the addendum to the Draft OM&M Plan submitted in August 2007. Gauged 24 monitoring wells on December 16, 2009 and collected groundwater samples from 8 monitoring wells on December 17 and 18, 2009. The Multi Phase Recovery System (MPRS) was on at the time of gauging and sampling.

Groundwater Monitoring: Number of Wells: 24
Gauging Frequency: Quarterly
Sampling Frequency: Quarterly (9 wells 1st, 2nd & 4th quarter / 16 wells 3rd quarter)
Overburden Groundwater Depth: 1.61 feet to 41.06 feet

The Multi Phase Remedial System (MPRS) was operating during water level gauging and vacuum influence monitoring. All measurements were recorded and samples collected during operating conditions.

Shallow Groundwater Flow:	Variable
Intermediate Groundwater Flow:	Northeast
Deep Groundwater Flow:	Variable
Shallow Groundwater Gradient:	0.05 feet per foot
Intermediate Groundwater Gradient:	0.30 feet per foot
Deep Groundwater Gradient:	0.01 feet per foot

Site Geology:

The top of bedrock is located approximately 55 feet below grade throughout the Site. Surficial deposits at the Site generally consist of reddish-brown silt and clay with lesser amounts of brown fine/coarse grained sand and gray rounded gravel. Coarser material (particularly sand) is more abundant at depths of 0 to 6 feet below grade compared to deeper intervals. The relative permeability of the unconsolidated deposits above bedrock at the Site is considered low.

MPRS Effectiveness:

The MPRS continues to recover limited residual methylene chloride from areas of impacted soil and groundwater.

Since March 12, 2009 only three wells (MW-D8, RW-5 and RW-4) have been used as recovery wells as methylene chloride concentrations were highest in these wells based on previous quarterly sampling results. Recovery wells RW-4 (intermediate depth), RW-5 (intermediate depth) and MW-D8 (intermediate depth) continue to exhibit elevated methylene chloride concentrations compared to other wells across the site. RW-4, RW-5 and MW-D8 will continue to be used as recovery wells during the continued pulsing operation throughout the first quarter of 2010 or until closure of the site is approved by NYSDEC.

The dissolved phase concentration has been reduced across the Site as depicted on Figures 7 through 20. The total VOC vapor mass recovery rate steadily decreased since system start up to a steady state indicative of asymptotic condition that was reached in approximately January 1, 2009 and which continues today. During the investigation phase, the quantity of

subsurface methylene chloride was estimated to be 171 pounds. As of December 31, 2009, an estimated total of 138.2 pounds of methylene chloride has been recovered since system startup. For the period from October 1, 2009 to December 31, 2009, the system recovered an estimated total of 0.6 pounds of methylene chloride. The system operated for a total of 530 hours during this quarter. The average calculated recovery rate of methylene chloride over this quarter is 0.0011 pounds per hour. Overall mass recovery will continue to be monitored as a part of the effort to evaluate remedial effectiveness.

The VOC recovery rate of the MPRS has significantly diminished to an asymptotic level.

Comments:

The wells were sampled in accordance with the ground water sampling procedures outlined in Section 4.3 of the Draft OM&M Plan and the addendum to the Draft OM&M Plan submitted in August 2007. Wells were sampled in order of the lowest historical methylene chloride concentration to the highest historical methylene chloride concentration. The pumps were decontaminated between wells in accordance with the addendum to Section 1.5 of the Site Specific Health and Safety Plan presented as Attachment A to the OM&M Plan contained within the Draft Final Engineering Report.

Methylene chloride concentrations in groundwater collected from other site-related monitoring wells are within historical levels. Recovery well RW-4 had a concentration of 240 µg/L this quarter as compared to 3,300 µg/L last quarter. Recovery well MW-D8 had a concentration of 27,000 µg/L this quarter as compared to 21,000 µg/L last quarter. Recovery well RW-5 (35') had a concentration of 40 µg/L this quarter as compared to 630 µg/L last quarter.

Methylene chloride concentrations in groundwater showed slight to no variations in the other five wells. MW-D7, showed an increase in concentration from below detection limits last quarter to 6.3 µg/L. The other four wells (MW-18, MW-D12, MW-D13 & RW-2) showed no change in concentration and stayed below detection limits.

Based on available data and consistently low recovery rates, asymptotic conditions have been reached. The existing remediation system is no longer exhibiting effective recovery of methylene chloride. Kleinfelder, on behalf of UCB/Sanofi Aventis, is currently drafting a site closure plan to summarize data and propose a path towards closure.

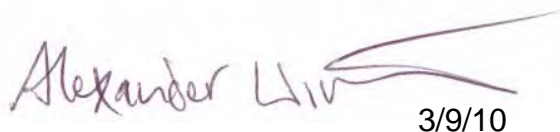
The NYSDEC-approved pulsing program continues by the ongoing cycle of one week of operation followed by three weeks of shut down of the MPRS. The initial testing of the pulsing program was conducted from April 13 to July 6, 2009; a summary report was submitted on August 11, 2009. The system will continue to be pulsed on a repeated cycle defined as operating for one week followed by not operating for three weeks until closure is granted by NYSDEC.

Attachments:

Table: Table 1 – Monitoring Well Gauging and Groundwater Analytical Data

Figures: Figure 1 – Area Map
Figure 2 – Site Plan
Figure 3 – Groundwater Contour and Concentration Map – Shallow Wells
Figure 4 – Groundwater Contour and Concentration Map – Intermediate Wells
Figure 5 – Groundwater Contour and Concentration Map – Deep Wells
Figure 6 – Diagonal Well Potentiometric Conversion
Figure 6a – Vacuum Readings
Figures 7-20 – Dissolved Phase Concentration Trend Graphs

Appendices: Appendix A – Monthly Progress Reports – October, November and December 2009



Alexander Wirth
Senior Project Geologist

3/9/10
Date



Theodore Sikora
Project Geologist

3/9/10
Date

TABLE

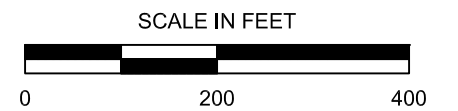
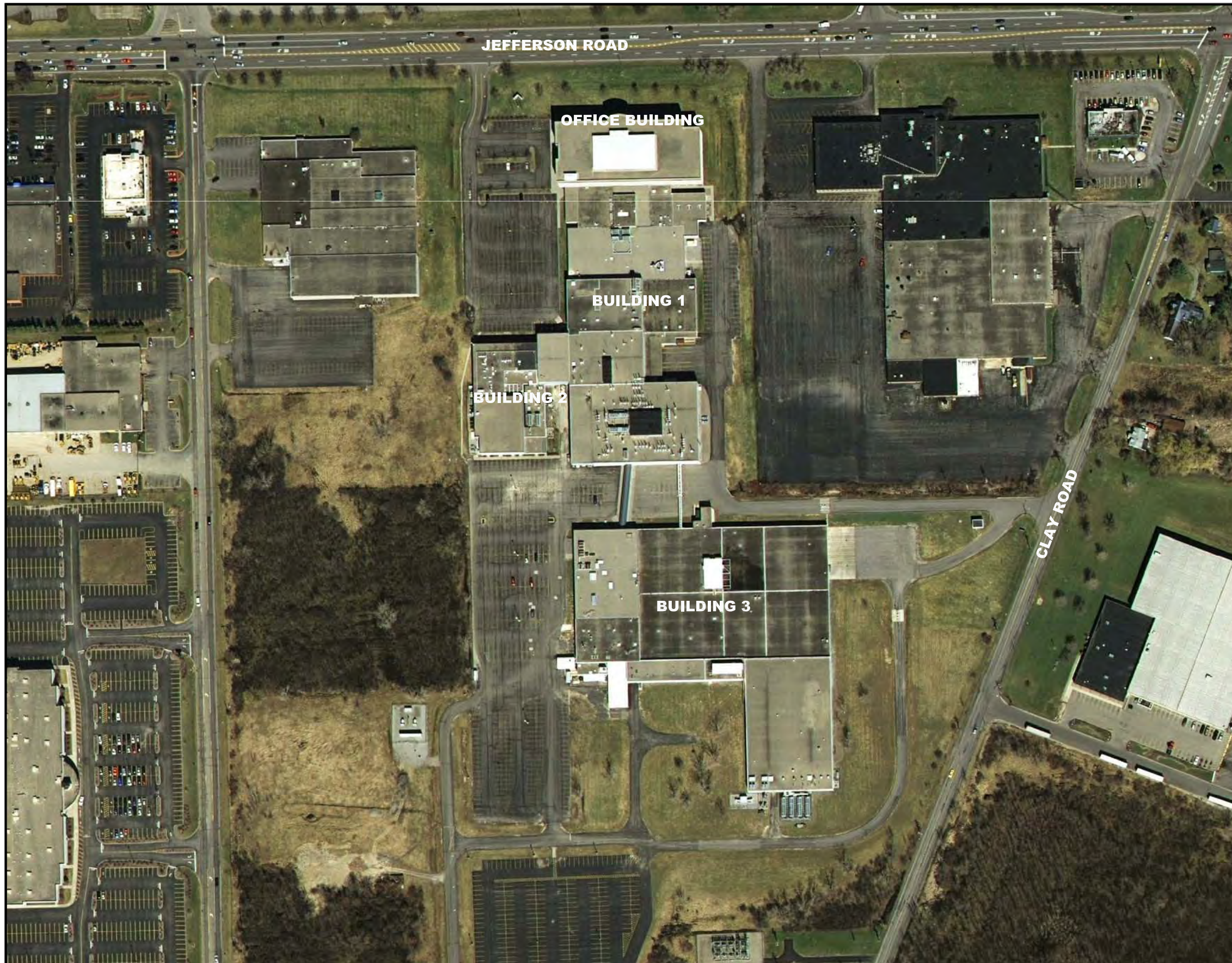
Table 1
MONITORING WELL GAUGING AND GROUNDWATER ANALYTICAL DATA

UCB Facility
755 Jefferson Road
Rochester, New York
June 18, 2007 through December 17, 2009

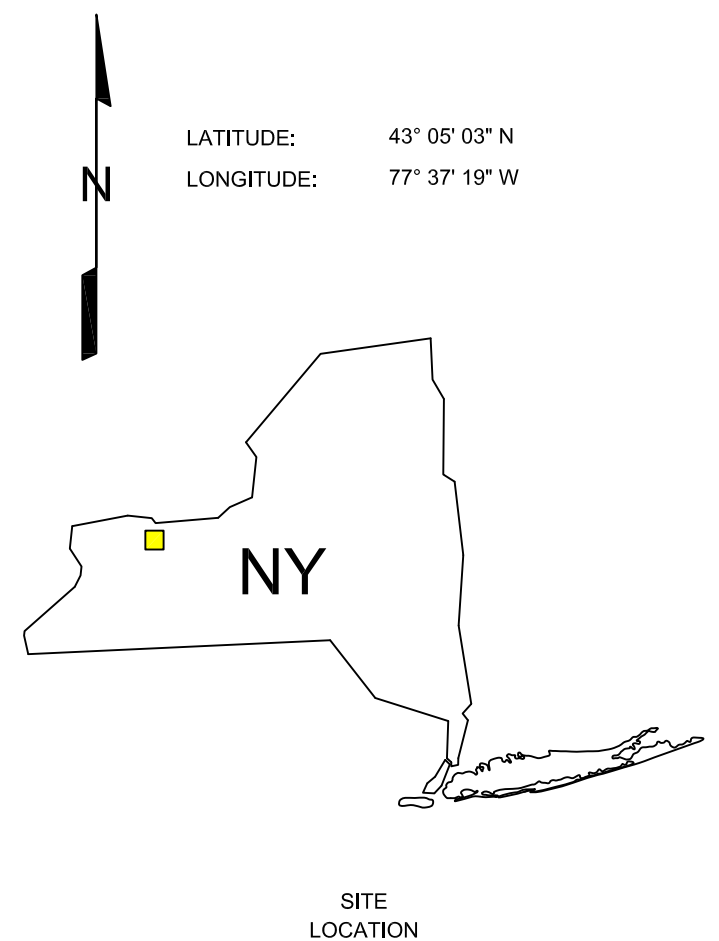
Sample ID	Date	TOC Elevation	Depth to Water	Corrected Water Table Elevation	Acetone	Methyl Ethyl Ketone	Dichloro- difluoromethane	cis-1,2- Dichloroethene	Ethyl acetate	Isopropyl acetate	n-Amyl Acetate	Total Xylenes	Benzene	Chloroform	Chloromethane	1,1- Dichloroethylene	trans-1,2- Dichloroethene	Carbon Disulfide	Methylene chloride	
NYSDEC Standards					50	50	5	5	-	-	-	5	1	7	5	5	5	50	5	
RW-5 (Recovery well, gauge & sample)	8/26/2003	NG	NG	NG	BRL	2.4 J	BRL	0.88 J	NA	NA	NA	BRL	BRL	BRL	0.54 J	NA	BRL	NA	NA	120
	9/2/2005	NG	NG	NG	BRL	NA	NA	NA	NA	NA	NA	NA	BRL	NA	NA	NA	NA	NA	NA	BRL
	2/23/2007	NG	NG	NG	BRL	BRL	NA	NA	BRL	BRL	NA	BRL	BRL	BRL	BRL	NA	NA	NA	NA	BRL
	6/20/2007	547.27	22.66	524.61	<25	<25	<5.0	<5.0	<5.0	<5.0	NA	<15	<5.0	<5.0	5.3	<5.0	<5.0	NA	NA	45,000 D
	9/20/2007	547.27	28.97	518.30	<250	<250	NA	<50	<50	<50	NA	<150	<50	<50	<50	NA	NA	NA	NA	1,000
	12/16/2007	547.27	3.05	544.22	<250	<250	<50	<50	<50	<50	<50	<150	<50	<50	<50	<50	<50	<50	<50	770
	3/17/2008	547.27	14.13	537.28	<250	<250	<50	<50	<50	<50	<50	<150	<50	<50	<50	<50	<50	<50	<50	530
	6/4/2008	547.27	46.08	514.69	<250	<250	<50	<50	<50	<50	<50	<150	<50	<50	<50	<50	<50	<50	<50	410
	9/10/2008	547.27	41.88	517.80	<12,000	<12,000	<2,500	<2,500	<2,500	<2,500	<2,500	<2,500	<2,500	<2,500	<2,500	<2,500	<2,500	<2,500	<2,500	25,000
	12/17/2008	547.27	9.89	540.21	<2,500	<2,500	<500	<500	<500	<500	<1,500	<500	<500	<500	<500	<500	<500	<500	<500	6,500
35	3/23/2009	547.27	45.36	515.20	<25	<25	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	22 B
	6/17/2009	547.27	42.89	516.94	<25	<25	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	2.2, 1B
	9/17/2009	547.27	44.76	515.62	<120	<25	<25	<25	<25	<25	<25	<50	<25	<25	<25	<25	<25	<25	<25	630
	12/17/2009	547.27	13.25	537.90	<25	<25	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	40
23	3/23/2009	547.27	45.36	515.20	<2500	<2500	<500	<500	<500	<500	<1,000	<500	<500	<500	<500	<500	<500	<500	<500	8,900 D
	6/17/2009	547.27	42.89	516.94	<25	<25	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	0.94, 1B
	9/17/2009	547.27	44.76	515.62	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	12/17/2009	547.27	13.25	537.90	<25	<25	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	32
RW-6 (Recovery well, gauge & sample)	8/26/2003	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	NA	140,000
	9/9/2005	NG	NG	NG	5	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	3,300 D
	2/22/2007	NG	NG	NG	BRL	BRL	NA	BRL	BRL	BRL	NA	BRL	BRL	BRL	BRL	NA	NA	NA	NA	BRL
	6/20/2007	547.89	12.71	535.18	<25	<25	<5.0	<5.0	<5.0	<5.0	NA	<15	<5.0	<5.0	<5.0	<5.0	<5.0	NA	NA	<5.0
	9/20/2007	547.89	17.40	530.49	<25	<25	NA	<5.0	<5.0	<5.0	NA	<15	<5.0	<5.0	<5.0	NA	NA	NA	NA	<5.0
	12/19/2007	547.89	1.62	544.71	<25	<25	<5.0	<5.0	<5.0	<5.0	<15	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
	3/18/2008	547.89	4.58	543.81	<25	<25	<5.0	<5.0	<5.0	<5.0	<15	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
	6/4/2008	547.89	36.96	514.96	<25	<25	<5.0	<5.0	<5.0	<5.0	<15	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
	9/11/2008	547.89	37.58	514.41	<25	<25	<5.0	<5.0	<5.0	<5.0	<15	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
	12/17/2008	547.89	38.38	512.80	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	3/23/2009	547.89	7.91	540.84	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	6/17/2009	547.89	33.77	517.80	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
9/17/2009	547.89	9.91	539.06	<25	<25	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	
12/16/2009	547.89	11.78	537.41	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS

Notes:
 <1.0 - Not detected at or above the laboratory reporting limit shown.
 * - Sample results are from a pumping test
 All units reported in µg/L - micrograms per liter (parts per billion)
 All wells gauged on September 17, 2009
 B - analyte found in the associated blank, as well as in the sample
 Bolded - Detection above laboratory reporting limits
 BRL - Below laboratory reporting limits
 BTEX - benzene, toluene, ethylbenzene, and total xylenes
 Corrected Water Table Elevation - Determined by trigonometry for wells MW-D9, MW-D11 to MW-D13, and RW-4 to RW-6
 D - Sun-gate recovery unreportable due to dilution
 DRY* - Insufficient water to gauge or sample
 J - The reported concentration is estimated (the result is less than the sample quantitation limit but greater than zero
 NA - not analyzed
 NG - not gauged/for data not available
 NS - not sampled
 NYSDEC Standards and Guidance Values - New York State Department of Environmental Conservation Technical and Operational Guidance Series (TOGS) 1.1.1, Ambient Water Quality Standards and Guidance Values, June 1998 and Addendum April 2000
 Shading - Reported concentration detected above the applicable standard(s) or guidance value(s)

FIGURES



LATITUDE: 43° 05' 03" N
 LONGITUDE: 77° 37' 19" W



NEWBURGH, NY

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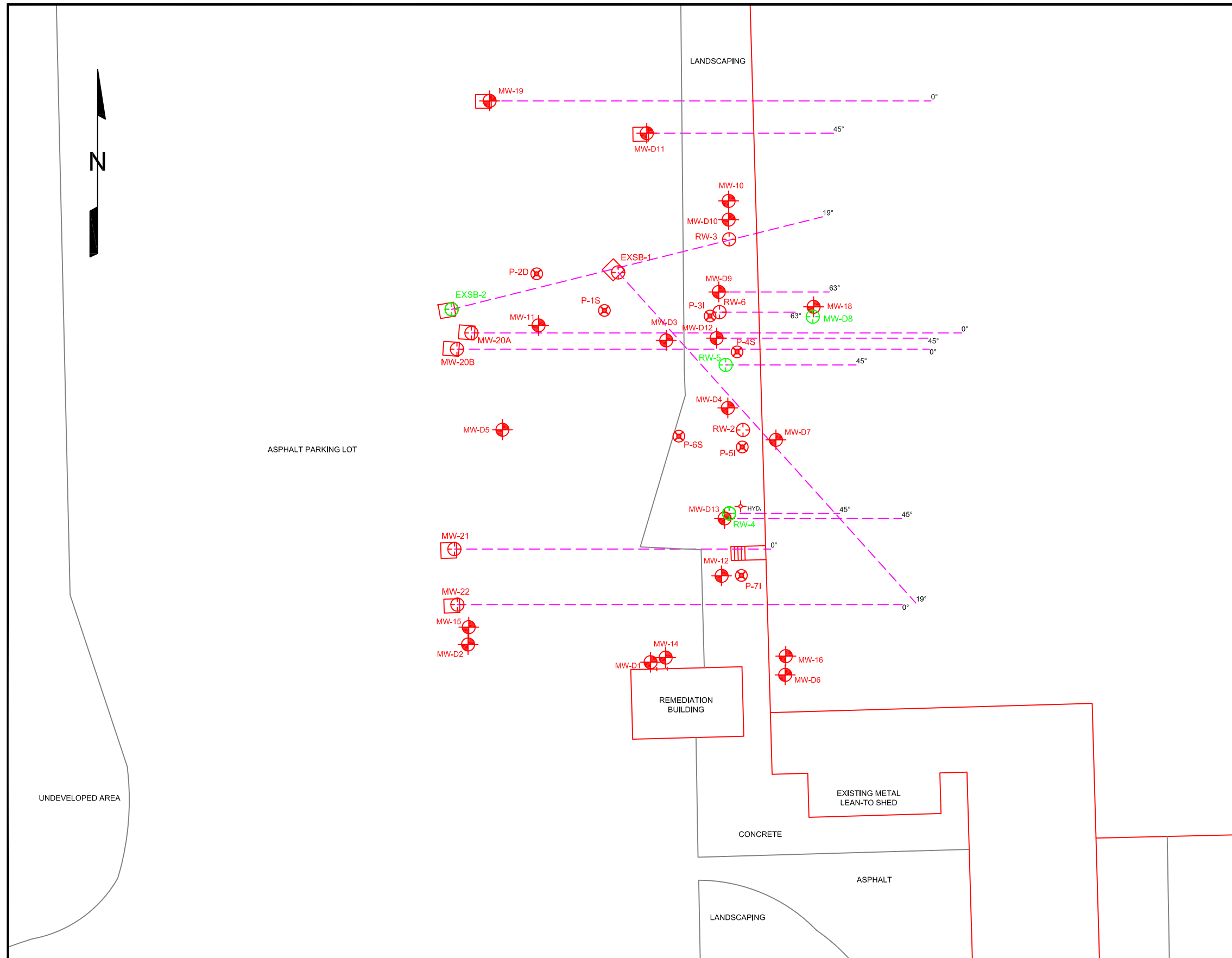
REFERENCES:

1. AERIAL IMAGES "w_14041124_12_09000_col_20051.sid" AND "w_14041126_12_09000_col_20051.sid" © NYS CLEARING HOUSE.
2. KLEINFELDER FIELD RESEARCH.

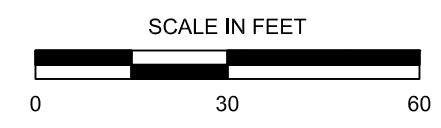


PROJECT NO.	105651
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DRAWN BY:	KAW
CHECKED BY:	TS
FILE NAME:	SANOFISSURJAN10.dwg

AREA MAP		FIGURE 1
UCB FACILITY NYSDEC VCP# V00126-8 755 JEFFERSON ROAD ROCHESTER MONROE COUNTY NEW YORK		



LEGEND	
	MONITORING WELL
	RECOVERY WELL
	PIEZOMETER
	VAULT
	FIRE HYDRANT
	ANGLED WELL (ANGLE MEASURED FROM GROUND SURFACE)



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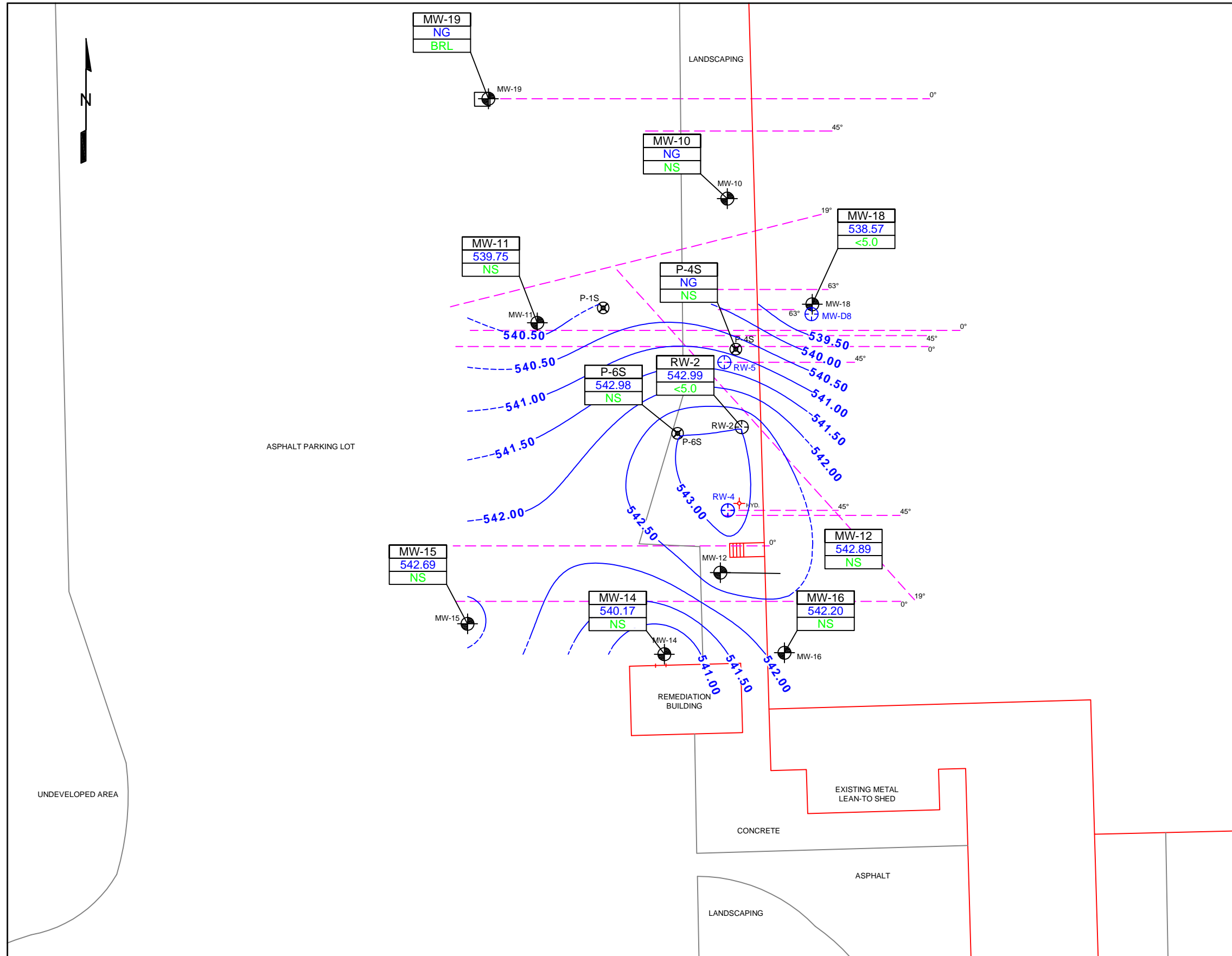
- REFERENCES:
- "WELL LOCATION MAP" PREPARED BY ERM, DATED SEPTEMBER, 2006.
 - KLEINFELDER FIELD RESEARCH.



PROJECT NO.	105651
DRAWN:	01/19/10
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FILE NAME:	SANOFISSURJAN10.dwg

SITE PLAN	
UCB FACILITY NYSDEC VCP# V00126-8 755 JEFFERSON ROAD ROCHESTER	
MONROE COUNTY	NEW YORK

FIGURE
2



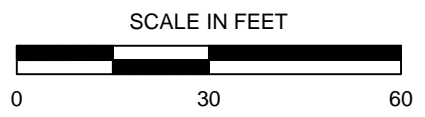
LEGEND

- MONITORING WELL
- RECOVERY WELL
- ACTIVE RECOVERY WELL
- PIEZOMETER
- VAULT
- FIRE HYDRANT
- ANGLD WELL (ANGLE MEASURED FROM GROUND SURFACE)

MW-15	542.69	NS
-------	--------	----

MONITORING WELL IDENTIFICATION
GROUNDWATER ELEVATION (FEET)
METHYLENE CHLORIDE (µg/L)

- WATER-TABLE CONTOUR (0.5 FOOT INTERVAL) (DASHED WHERE INFERRD)
- µg/L MICROGRAMS PER LITER
- NG NOT GAUGED
- NS NOT SAMPLED



NOTES:

- GROUNDWATER MONITORING WELLS WERE GAUGED AND SAMPLED ON DECEMBER 16-18, 2009.
- SYSTEM WAS OPERATIONAL AT THE TIME OF GAUGING AND SAMPLING.

REFERENCES:

- "WELL LOCATION MAP" PREPARED BY ERM, DATED SEPTEMBER, 2006.
- KLEINFELDER FIELD RESEARCH.

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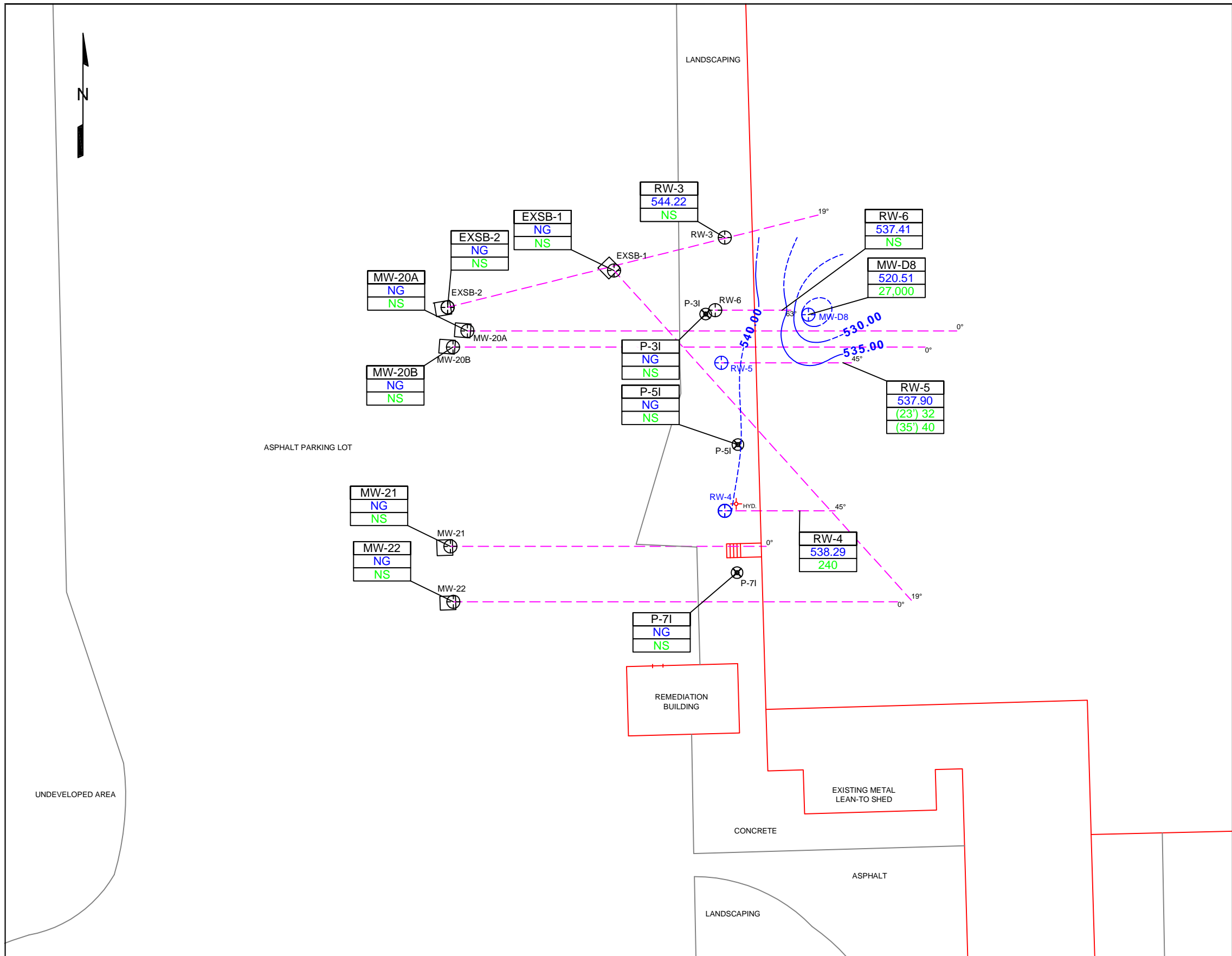
PROJECT NO.	105651
DRAWN:	02/12/10
DRAWN BY:	KAW
CHECKED BY:	AW
FILE NAME:	SANOIQQEEMRFEB10F3

GROUNDWATER CONTOUR AND CONCENTRATION MAP SHALLOW WELLS

UCB FACILITY
NYSDEC VCP# V00126-8
755 JEFFERSON ROAD
ROCHESTER

MONROE COUNTY NEW YORK

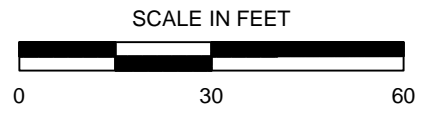
FIGURE
3



LEGEND

- RECOVERY WELL
- ACTIVE RECOVERY WELL
- PIEZOMETER
- VAULT
- FIRE HYDRANT
- ANGLD WELL (ANGLE MEASURED FROM GROUND SURFACE)
- | |
|--------|
| RW-6 |
| 537.41 |
| NS |

 MONITORING WELL IDENTIFICATION
GROUNDWATER ELEVATION (FEET)
METHYLENE CHLORIDE (µg/L)
- WATER-TABLE CONTOUR (5 FEET INTERVAL)
(DASHED WHERE INFERRED)
- µg/L MICROGRAMS PER LITER
- NG NOT GAUGED
- NS NOT SAMPLED



- NOTES:**
- GROUNDWATER MONITORING WELLS WERE GAUGED AND SAMPLED ON DECEMBER 16-18, 2009.
 - SYSTEM WAS OPERATIONAL AT THE TIME OF GAUGING AND SAMPLING.

- REFERENCES:**
- "WELL LOCATION MAP" PREPARED BY ERM, DATED SEPTEMBER, 2006.
 - KLEINFELDER FIELD RESEARCH.

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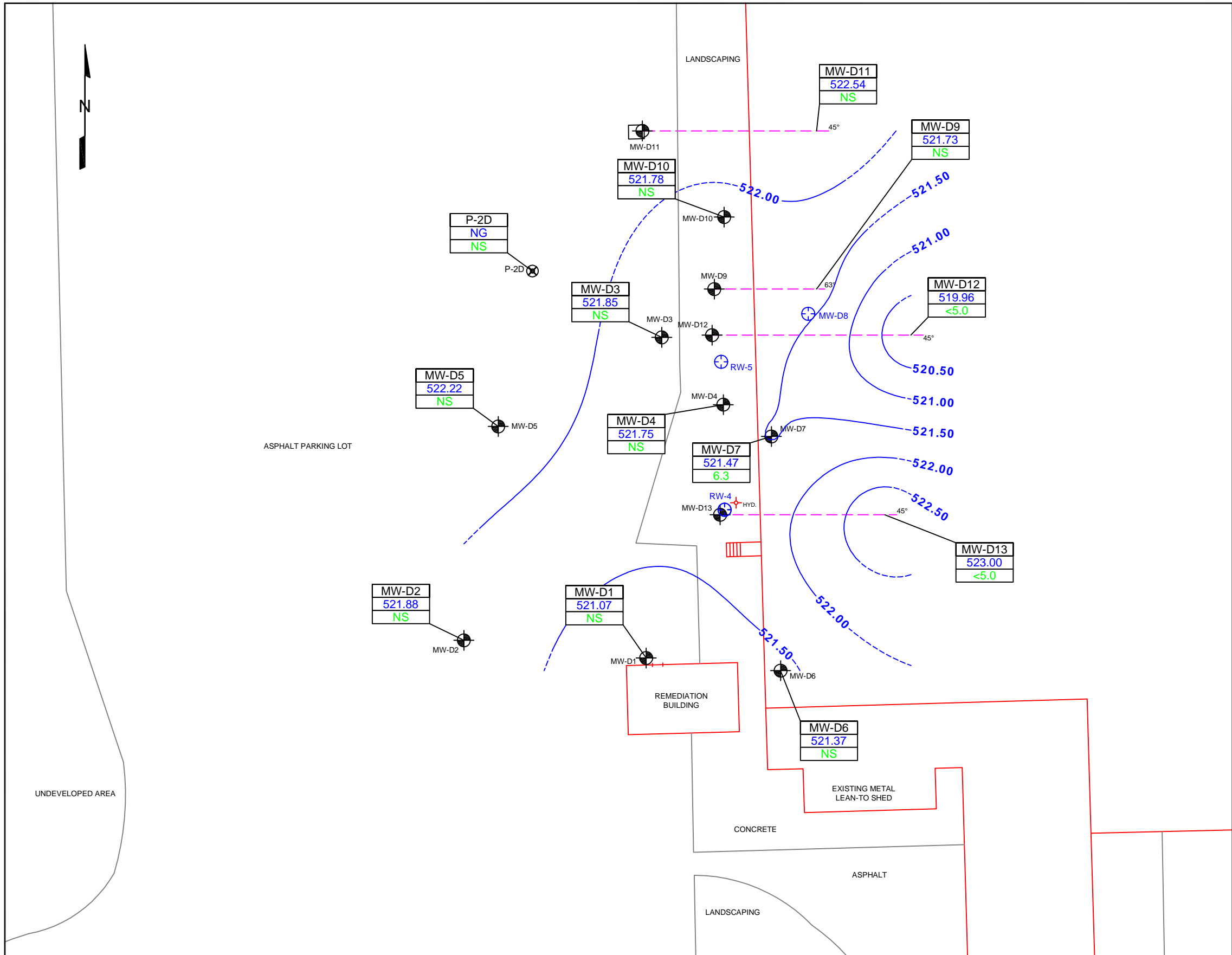


PROJECT NO.	105651
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GROUNDWATER CONTOUR AND CONCENTRATION MAP INTERMEDIATE WELLS

UCB FACILITY
NYSDEC VCP# V00126-8
755 JEFFERSON ROAD
ROCHESTER
MONROE COUNTY NEW YORK

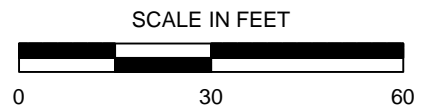
FIGURE
4



LEGEND

- MONITORING WELL
- ACTIVE RECOVERY WELL
- PIEZOMETER
- VAULT
- FIRE HYDRANT
- ANGLED WELL (ANGLE MEASURED FROM GROUND SURFACE)
- | | | |
|-------|--------|----|
| MW-D4 | 521.75 | NS |
|-------|--------|----|

 MONITORING WELL IDENTIFICATION
GROUNDWATER ELEVATION (FEET)
METHYLENE CHLORIDE (µg/L)
- WATER-TABLE CONTOUR (0.5 FOOT INTERVAL)
(DASHED WHERE INFERRED)
- µg/L MICROGRAMS PER LITER
- NG NOT GAUGED
- NS NOT SAMPLED



- NOTES:**
- GROUNDWATER MONITORING WELLS WERE GAUGED AND SAMPLED ON DECEMBER 16-18, 2009.
 - SYSTEM WAS OPERATIONAL AT THE TIME OF GAUGING AND SAMPLING.

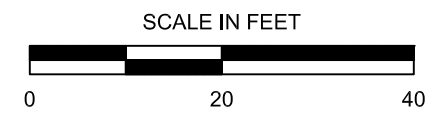
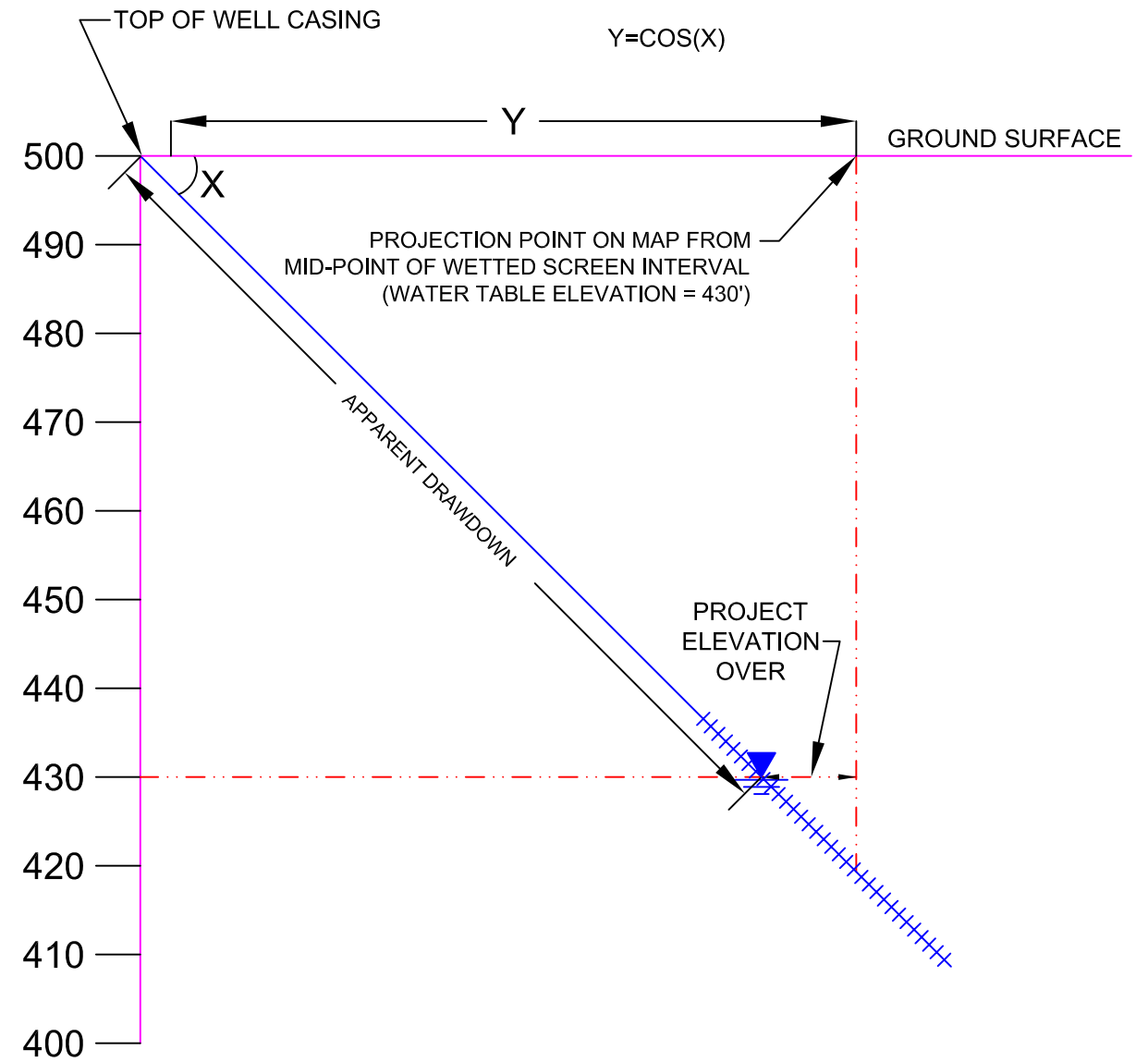
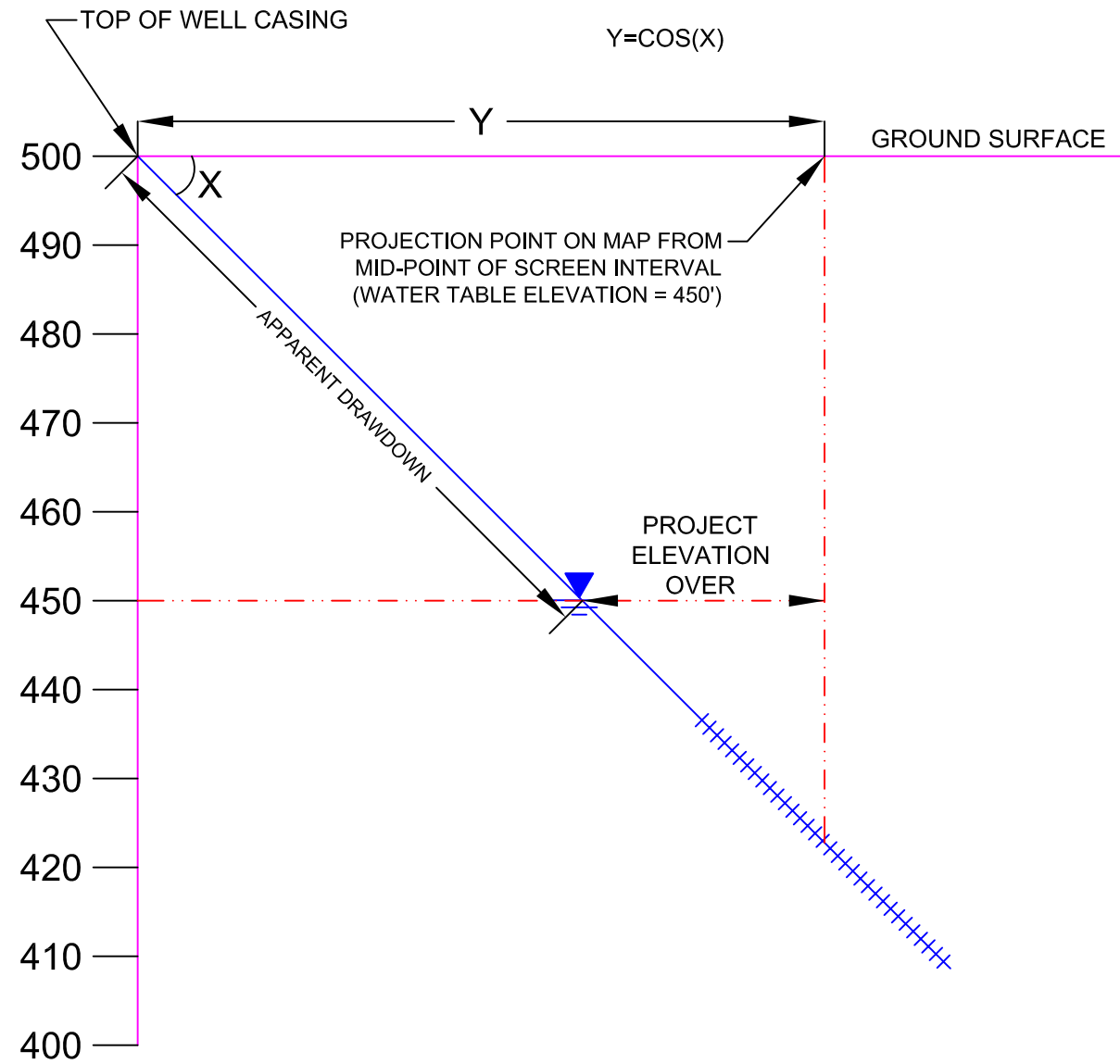
- REFERENCES:**
- "WELL LOCATION MAP" PREPARED BY ERM, DATED SEPTEMBER, 2006.
 - KLEINFELDER FIELD RESEARCH.

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FILE NAME:	SANOFIQEEMRFEB10F5

GROUNDWATER CONTOUR AND CONCENTRATION MAP DEEP WELLS

UCB FACILITY
NYSDEC VCP# V00126-8
755 JEFFERSON ROAD
ROCHESTER
MONROE COUNTY NEW YORK



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- REFERENCES:
1. "WELL LOCATION MAP" PREPARED BY ERM, DATED SEPTEMBER, 2006.
 2. KLEINFELDER FIELD RESEARCH.

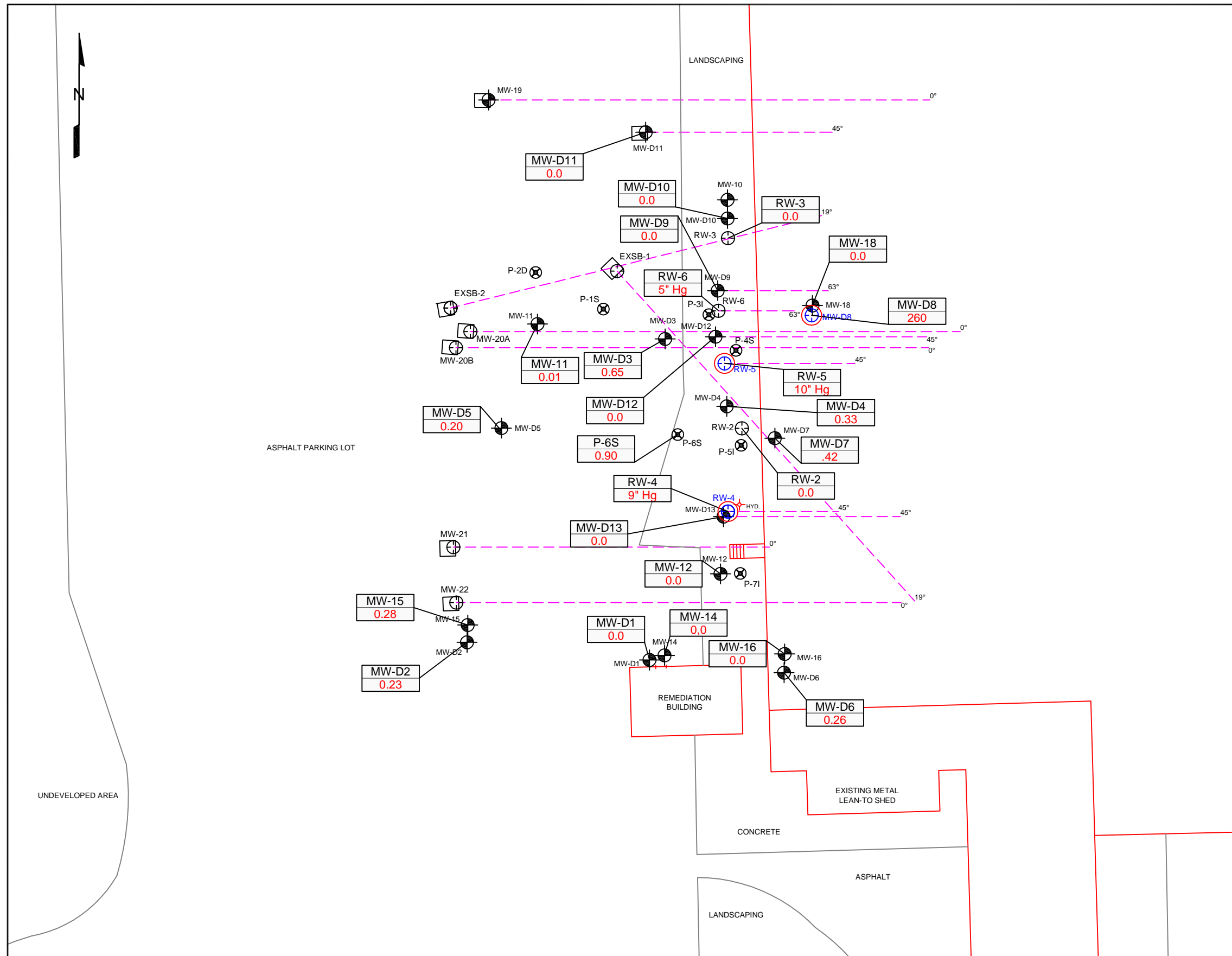


PROJECT NO.	105651
DRAWN:	01/21/10
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**DIAGONAL WELL
POTENTIOMETRIC CONVERSION**

UCB FACILITY
NYSDEC VCP# V00126-8
755 JEFFERSON ROAD
ROCHESTER
MONROE COUNTY NEW YORK

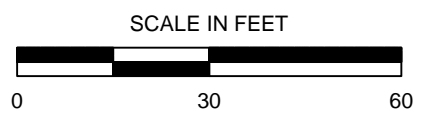
FIGURE
6



LEGEND

- MONITORING WELL
- RECOVERY WELL
- ACTIVE RECOVERY WELL
- PIEZOMETER
- WELL IN OPERATION IMMEDIATELY PRIOR TO DATA/SAMPLE COLLECTION
- VAULT
- FIRE HYDRANT
- 45° ANGLED WELL (ANGLE MEASURED FROM GROUND SURFACE)

MONITORING WELL IDENTIFICATION VACUUM INFLUENCE (MEASUREMENTS DEPICTED IN INCHES OF H₂O COLUMN, RELATIVE TO ATMOSPHERE)



NOTES:
1. VACCUM READINGS WERE RECORDED ON DECEMBER 16, 2009.

REFERENCES:
1. "WELL LOCATION MAP" PREPARED BY ERM, DATED SEPTEMBER, 2006.
2. KLEINFELDER FIELD RESEARCH.

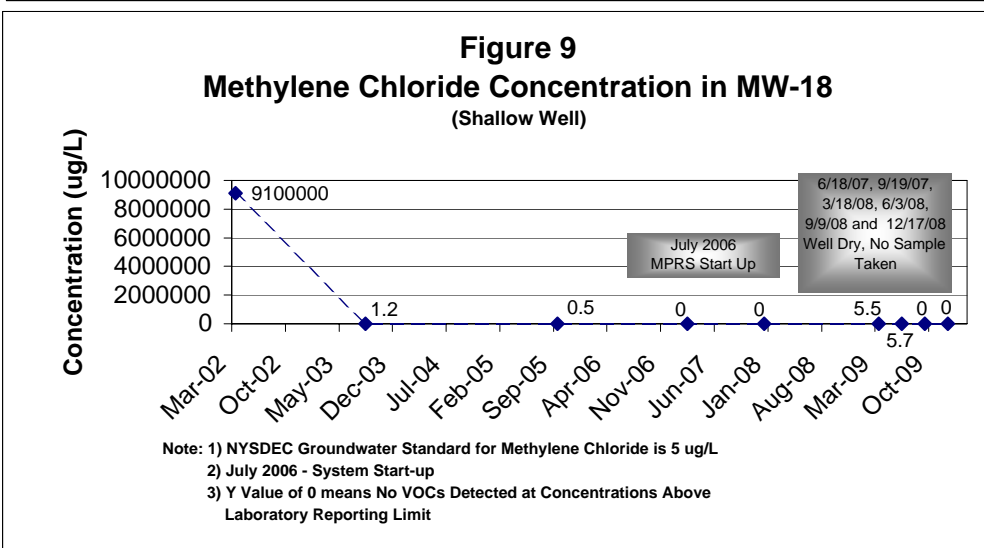
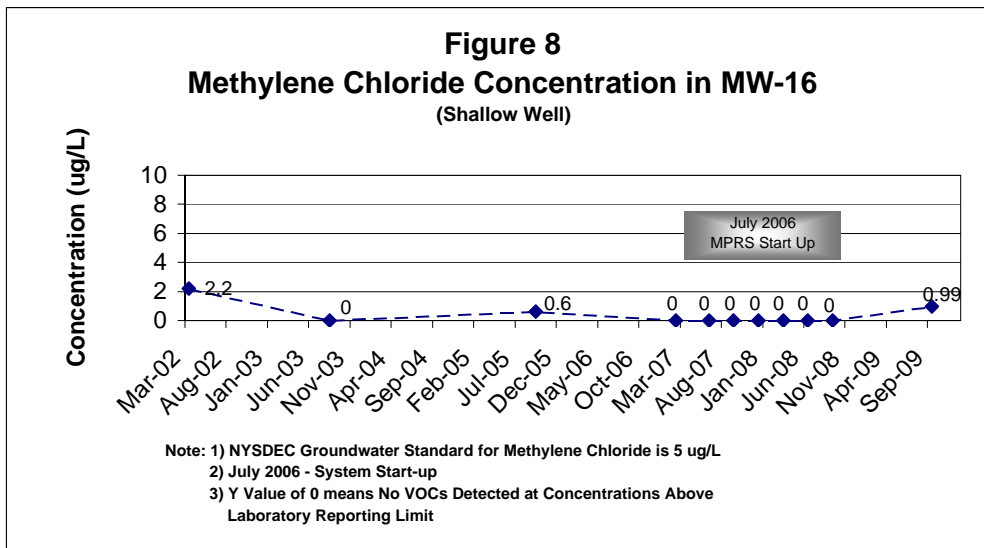
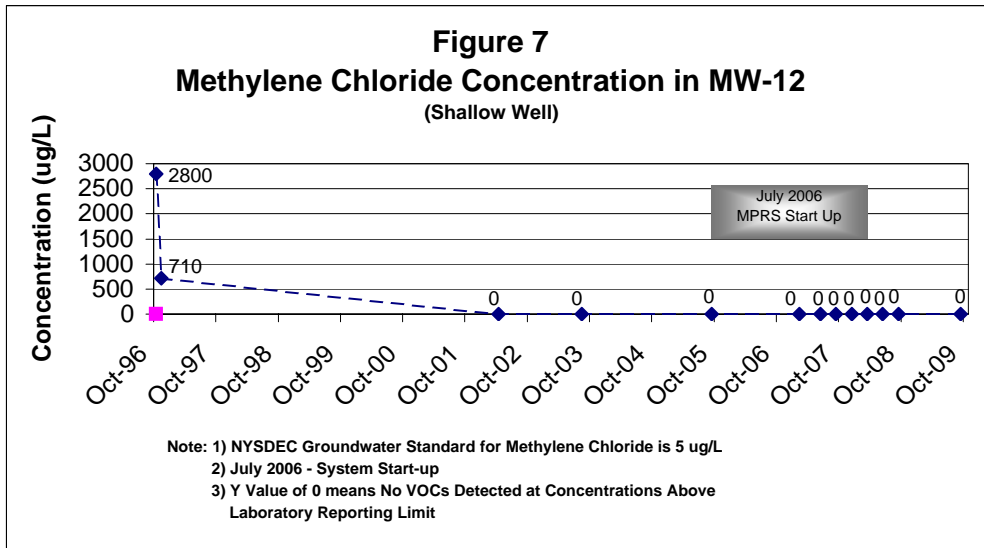
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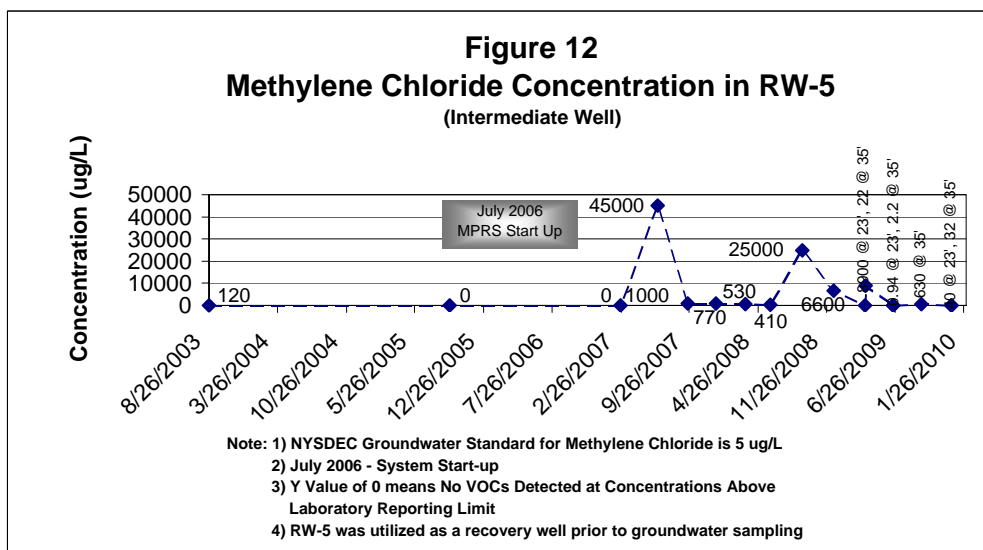
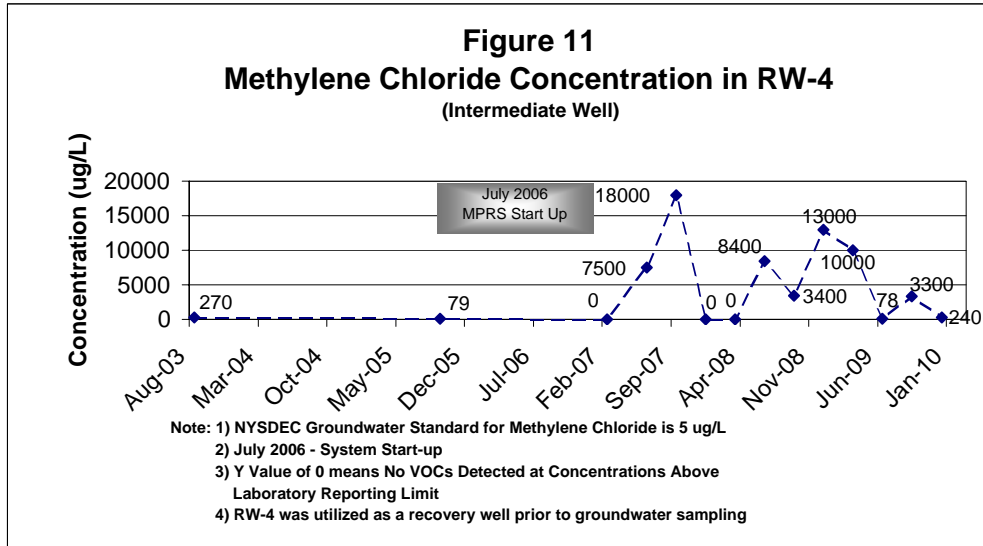
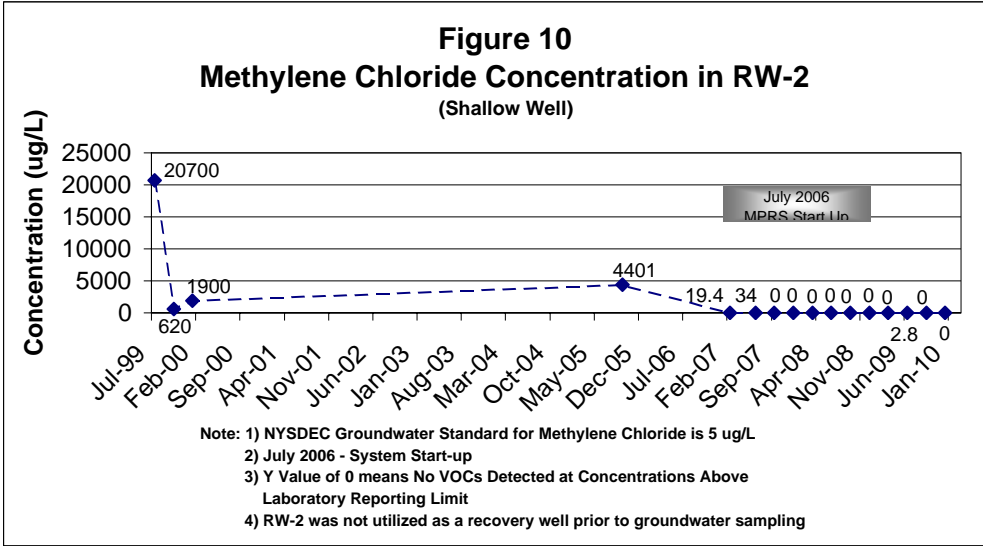
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DRAWN BY:	KAW
CHECKED BY:	AW
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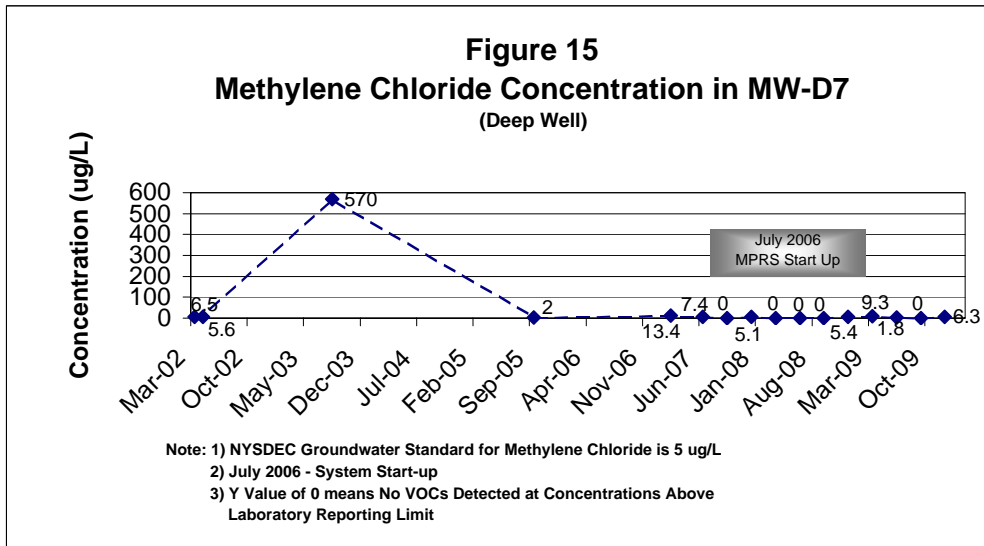
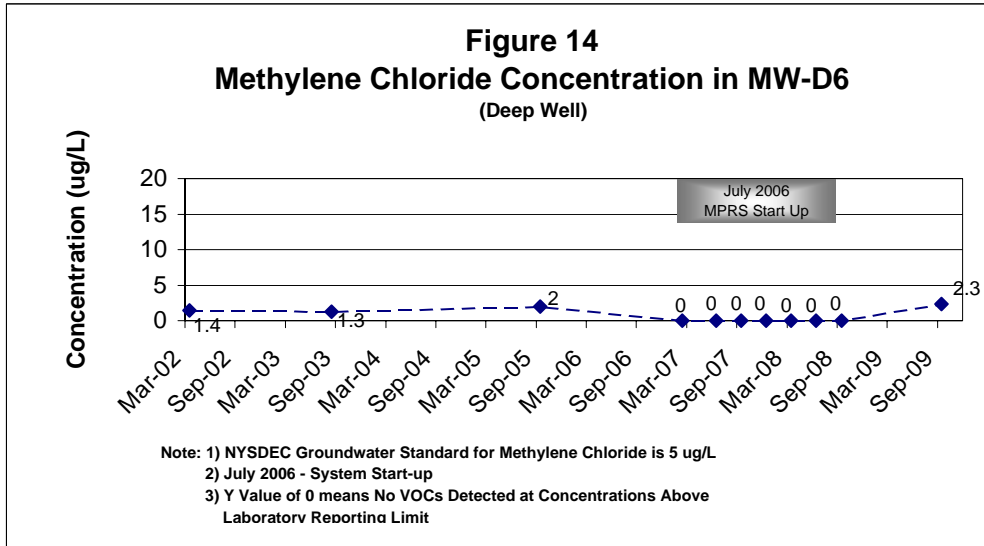
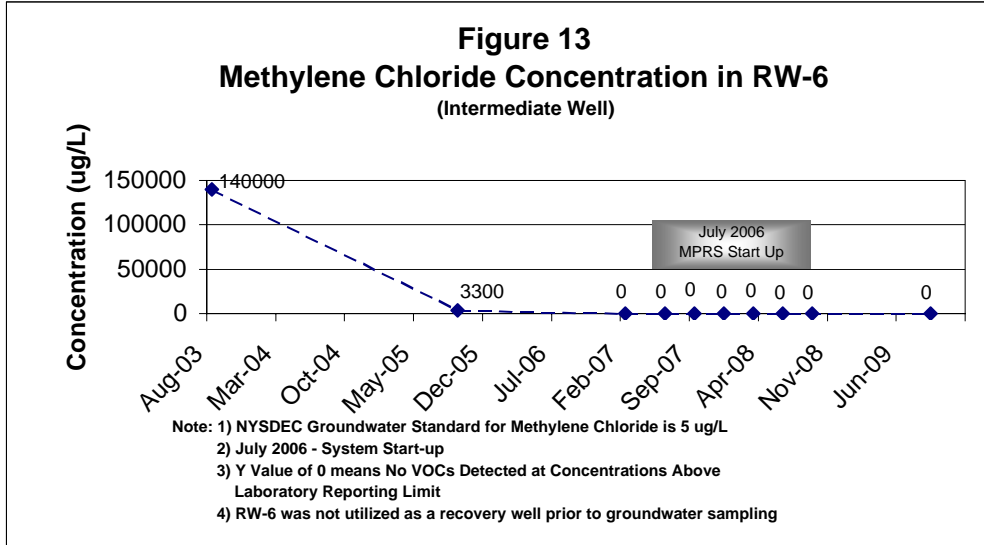
VACUUM READINGS

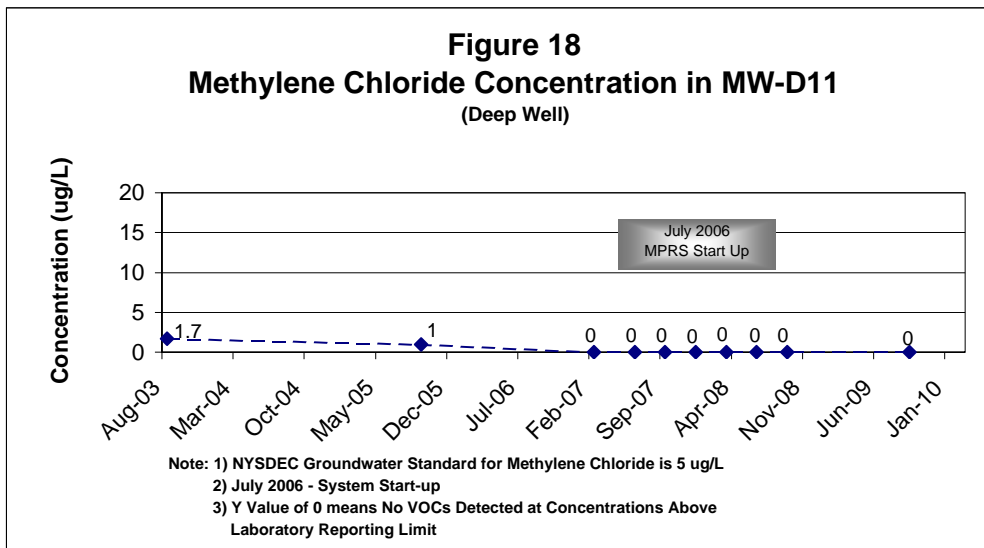
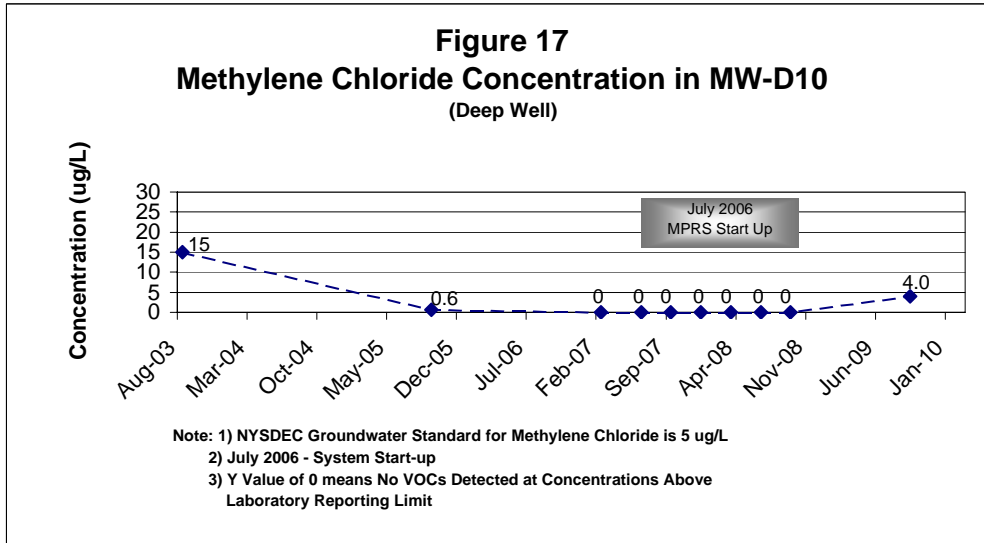
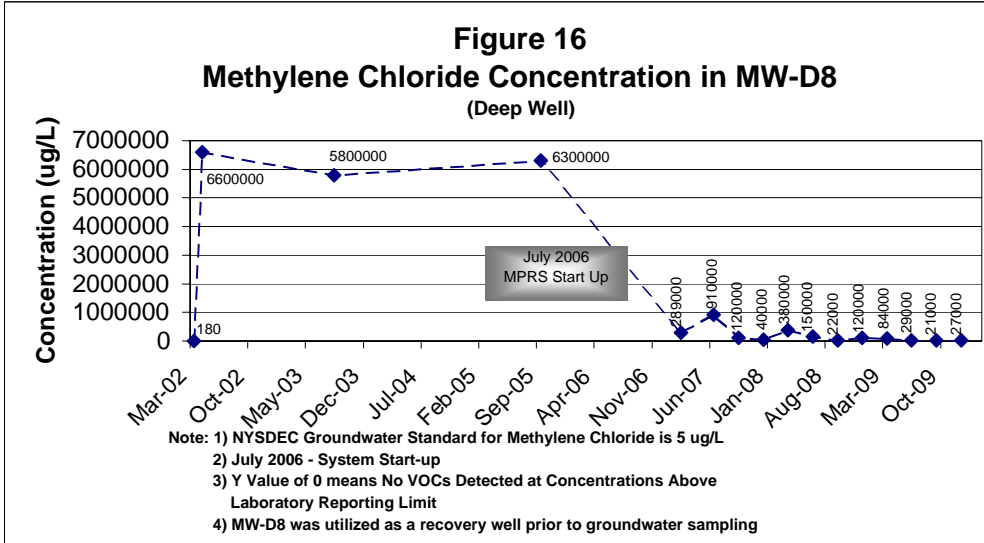
UCB FACILITY
NYSDEC VCP# V00126-8
755 JEFFERSON ROAD
ROCHESTER
MONROE COUNTY NEW YORK

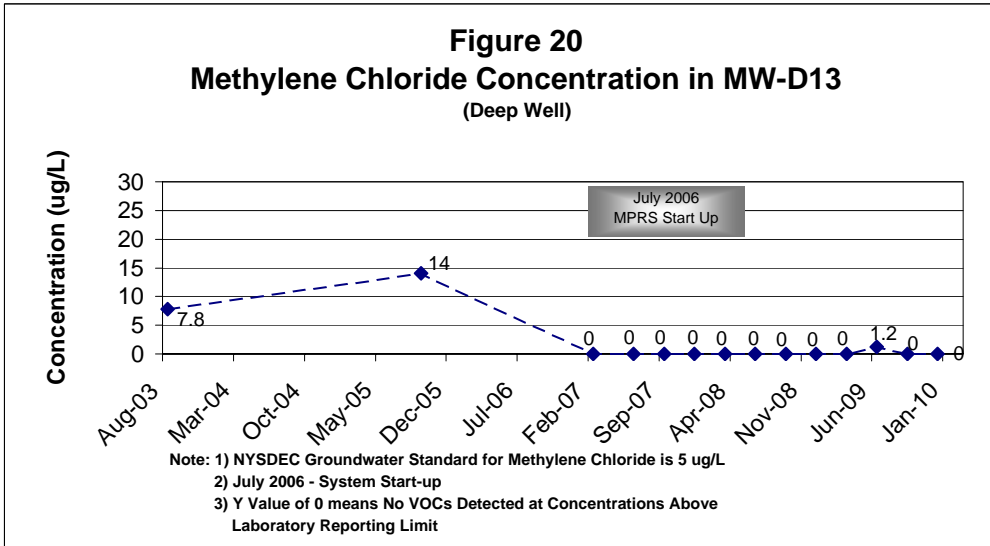
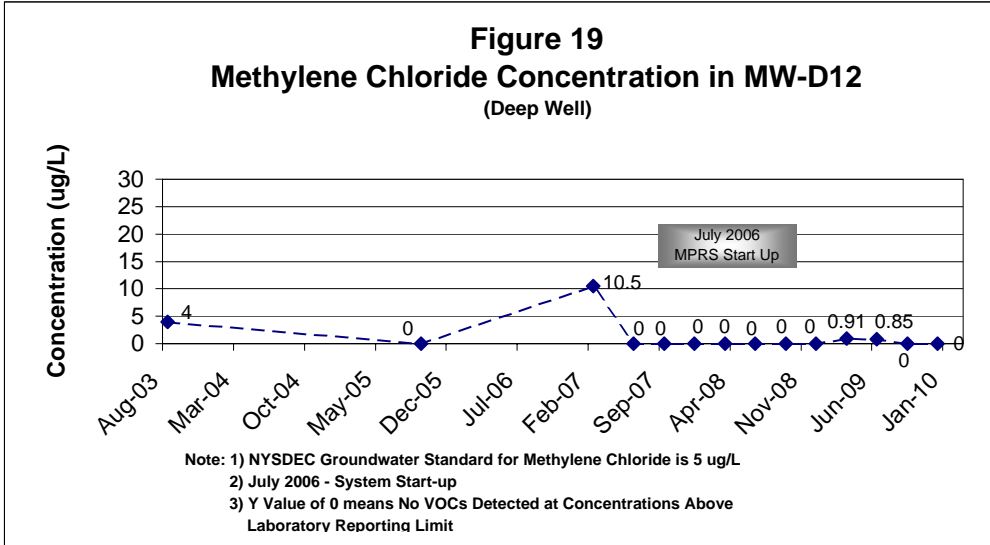
FIGURE
6A











Appendix A
Monthly Progress Reports – October, November and December 2009



November 10, 2009

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: Monthly Progress Report – October 2009
755 Jefferson Road Facility – Henrietta, New York
NYSDEC VCP Number V00126-8

***Key Actions
This Period:***

- **October 1 – October 31, 2009.** The system was intermittently operational in accordance with the NYSDEC approved pulsing plan.

Operations Metrics (October 14 – October 21)

- Operational Time: 170 out of a scheduled 170 hours of operation.
- Uptime Efficiency: 100%
- Volume of Groundwater Treated: 3,688 gallons.
 - Discharged to: The sanitary sewer system.
- Total estimated VOC mass recovered to date: 137.9 lbs.
- Total estimated VOC mass recovered during October: 0.22 lbs.
- Mean estimated VOC mass removal rate for October 2009 versus September 2009: 0.0012 versus 0.0018 lbs/hr.
- General weather conditions: Average precipitation and cool temperatures as compared to historical data.

Tables, Figures and Graphs

- Table 1: October Treated Waste Water Flow/Vapor Monitoring Data.
- Table 2: October Recovery Well Rotation Data.
- Figures 1-9: Remedial Effectiveness and Efficiency Platform (REEP) graphs
- Figures 2A and 3A: Selected Remedial Effectiveness and Efficiency Platform (REEP) graphs showing results from March 1, 2008 to present.

***Problems/
Resolutions:***

- None

***Analytical Data
Received:***

- The October 2009 influent vapor sample and the MPRS influent and effluent samples.

***Documents
Submitted:***

- Monthly Progress Report for September 2009 dated October 9, 2009.

**Anticipated
Actions –
November
2009:**

- Continue NYSDEC approved pulsing program until permission is granted to terminate system operation.
- Submittal of the Post Remedial Construction OM&M FER, Closure Request and Certification and revised Site Management Plan.

Comments:

- The attached REEP information is to be utilized as a subjective representation of the overall effectiveness/performance of the system as we are using discontinuous data and PID measurements for the removal calculations. We do not intend this tool as a definitive summary of recovered mass.
- MPRS operation and efficiency, inclusive of the replacement LRP pump and associated upgrades and maintenance, will continue to be monitored.

**NYSDEC-
Approved Field
Decisions:**

- Continuation of pulsing of MPRS system in accordance with the procedure presented to NYSDEC.

If you have any questions regarding this monthly report or progress on the project, please don't hesitate to contact me at 513-314-7543 or rbethel@qmg-inc.com.

Sincerely,
QUANTUM MANAGEMENT GROUP, INC.



Rick Bethel
Senior Associate

Attachments

cc:

Mr. Jeffrey M. Kosmala, P.E. (MCDOH)
Mr. Michael Bogdan (Sanofi-Aventis)
Mr. Kevin Bruno (RFBC Law)
Mr. Mark Byrne, P.E. (Town of Henrietta)
Ms. Libby Ford, (Nixon Peabody)
Mr. Joseph Hausbeck, Esq. (NYSDEC)
Mr. George Hollerbach, P.E. (Quantum)

Ms. Melissa Menetti (NYSDOH)
Mr. David Panipinto (UCB)
Mr. Bart Putzig, P.E. (NYSDEC)
Mr. Sean Keenan (MCDES)
Mr. John Lang, P.E. (Quantum)
Mr. Greg Light (UCB)

**TABLE 1 - TREATED WASTE WATER FLOW/VAPOR MONITORING DATA
MCA REMEDIATION SYSTEM
755 JEFFERSON ROAD, HENRIETTA, NEW YORK
NYSDEC VCP NUMBER V00126-8
October 2009**

Date	Time ¹	Cumulative Hours ²	Total Flow ³ Gallons	Flow Rate ⁴ Gal/Min	Cumulative Gallons ^{5,6}	Influent PID (ppm)	Effluent PID (ppm)
9/16/2009	9:45	39073.9	n/a ⁷	n/a ⁷	n/a ⁷	n/a ⁷	n/a ⁷
10/14/2009	9:40	39074.82	115	2.0	304,477	0.7	0.2
10/14/2009	11:31	39076.64	257	2.4	304,734	0.1	0.0
10/16/2009	9:16	39122.39	1,504	0.5	306,238	0.9	0.3
10/16/2009	11:35	39124.68	121	0.9	306,359	0.3	0.0
10/19/2009	9:12	39194.33	948	0.2	307,307	1.5	0.3
10/19/2009	11:11	39196.31	132	1.1	307,439	1.2	0.0
10/21/2009	9:11	39242.34	477	0.2	307,916	1.1	0.2
10/21/2009	11:06	39244.22	134	1.2	308,050	1.8	0.0

¹Time of day (in military time) data was collected.

²Cumulative Hours represents the number of run-hours since MCA remediation system start-up on 12 July 2006.

³Total Flow in Gallons represents the flow that occurred since the time the last measurement was collected, as indicated in the previous row of the table.

⁴Flow Rate in Gallons/Minute represents the average flow rate since the time the last measurement was collected, as indicated in the previous row of the table.

⁵Cumulative Gallons represents the number of gallons of water treated by the MCA remediation system since start-up on 12 July 2006.

⁶Totalizer Flow readings collected from newly installed totalizer beginning October 2, 2007.

⁷n/a: data not available, Kleinfelder personnel on site was present for GWS only and was not trained to safely operate the system/collect data.

TABLE 2 - RECOVERY WELL ROTATION DATA
MCA REMEDIATION SYSTEM
755 JEFFERSON ROAD, HENRIETTA, NEW YORK
NYSDEC VCP NUMBER V00126-8
October 2009

Date	Well Rotation Clusters								
	EXSB-2	MW-D8	MW -21	MW-22	MW-20A	MW-20B	RW-6	RW-5	RW-4
October 1-13	System shut down as part of NYSDEC approved pulsing program								
October 14-21		X						X	X
October 22-31	System shut down as part of NYSDEC approved pulsing program								

Figure 1
MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
October 2009

Total VOC Mass Removed (Vapor and Ground Water Combined)

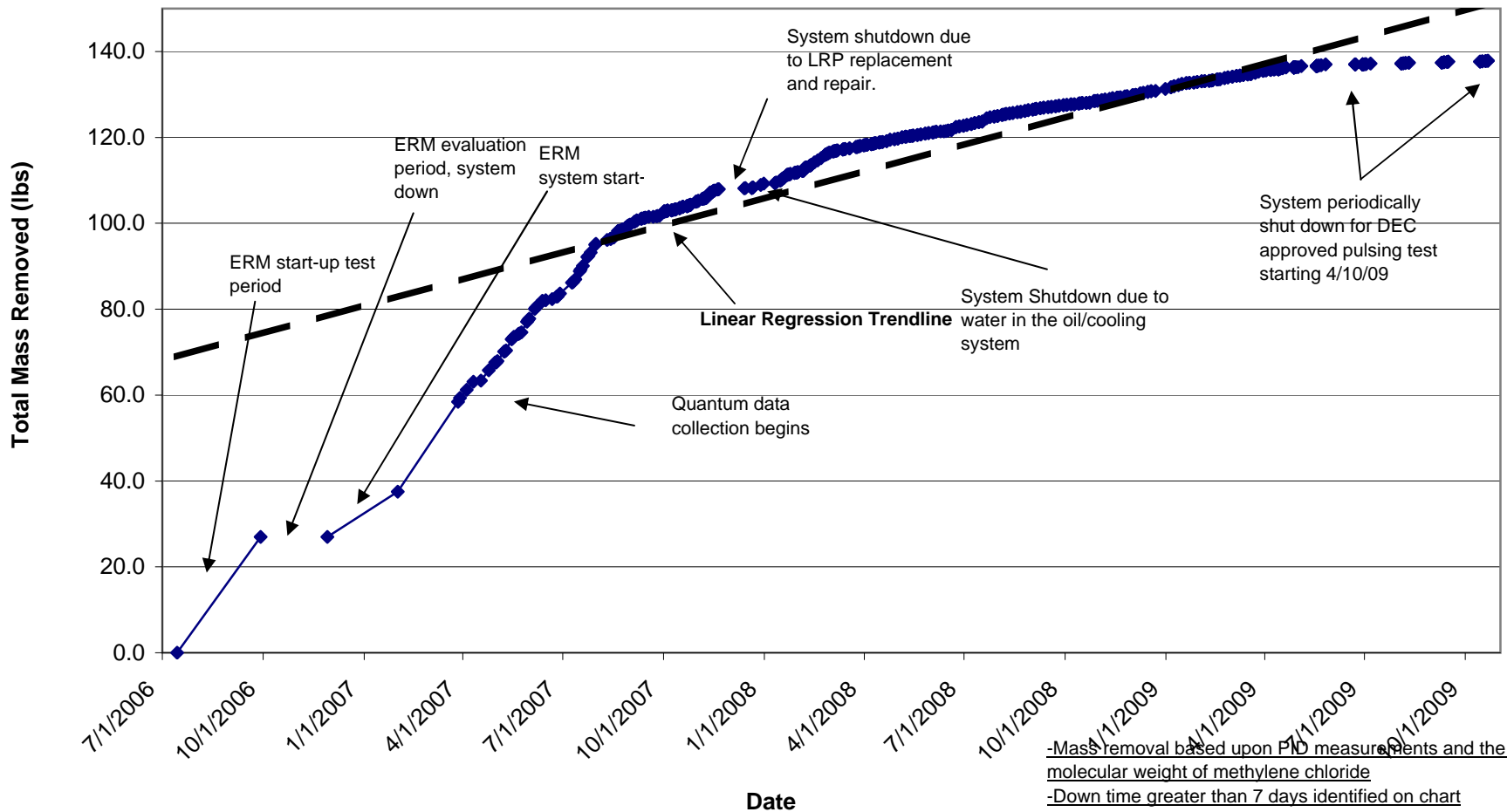


Figure 2

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
October 2009

Total VOC Mass Removal Rate (Vapor & Ground Water Combined)

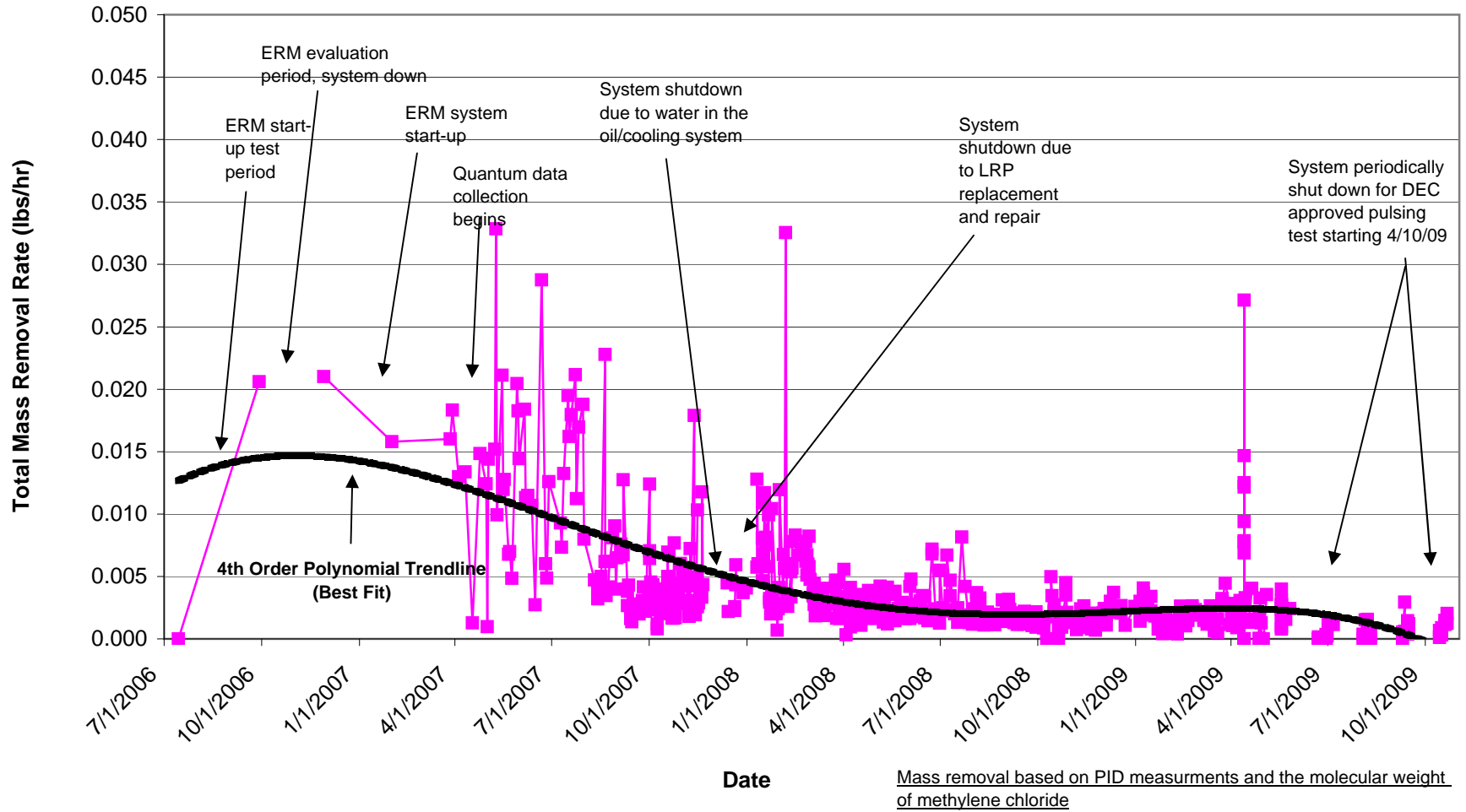


Figure 2A

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
October 2009

Total VOC Mass Removal Rate (Vapor & Ground Water Combined) Since October 2008

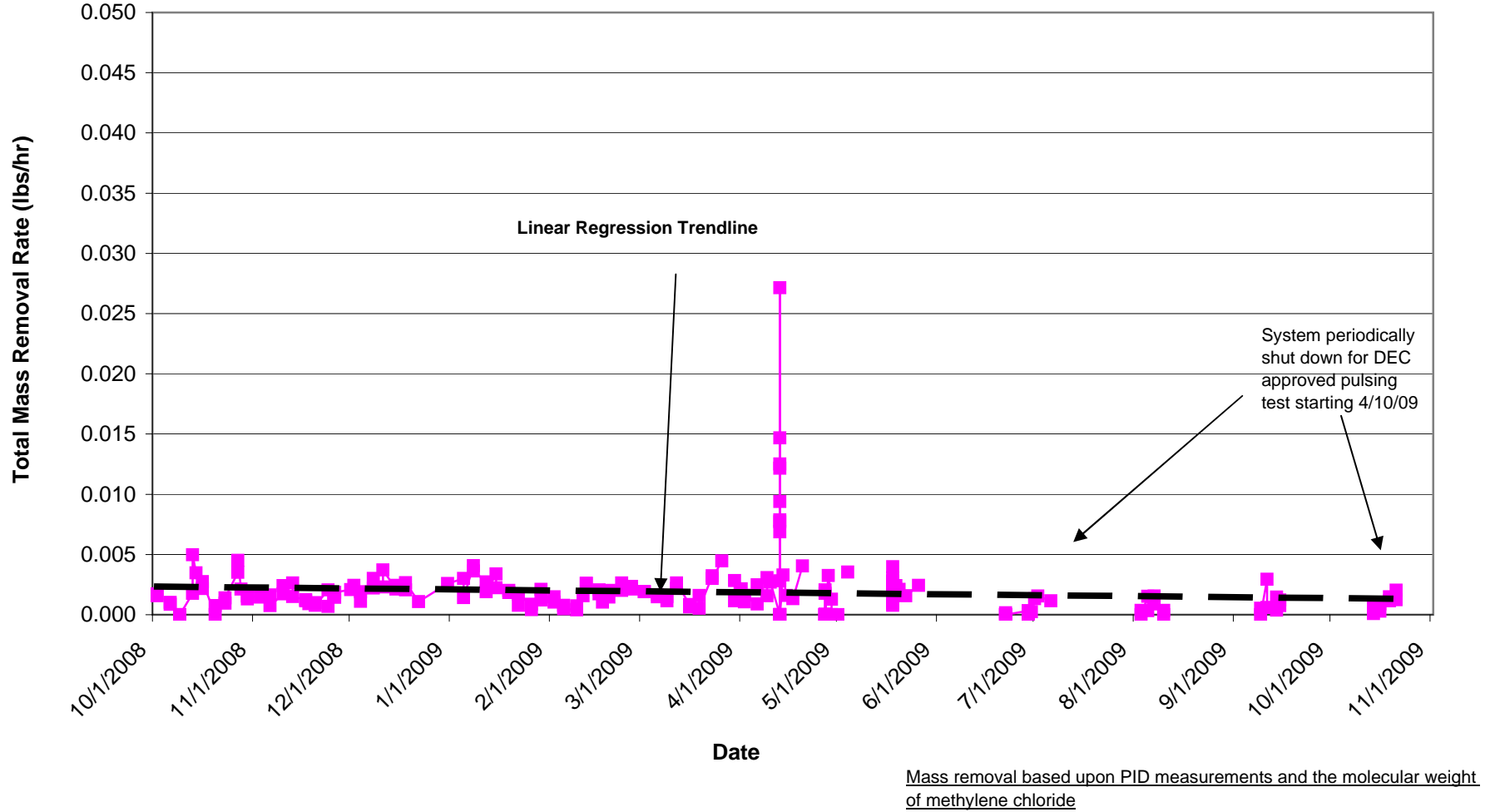


Figure 3
MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
October 2009

Vapor Mass Removal Rate

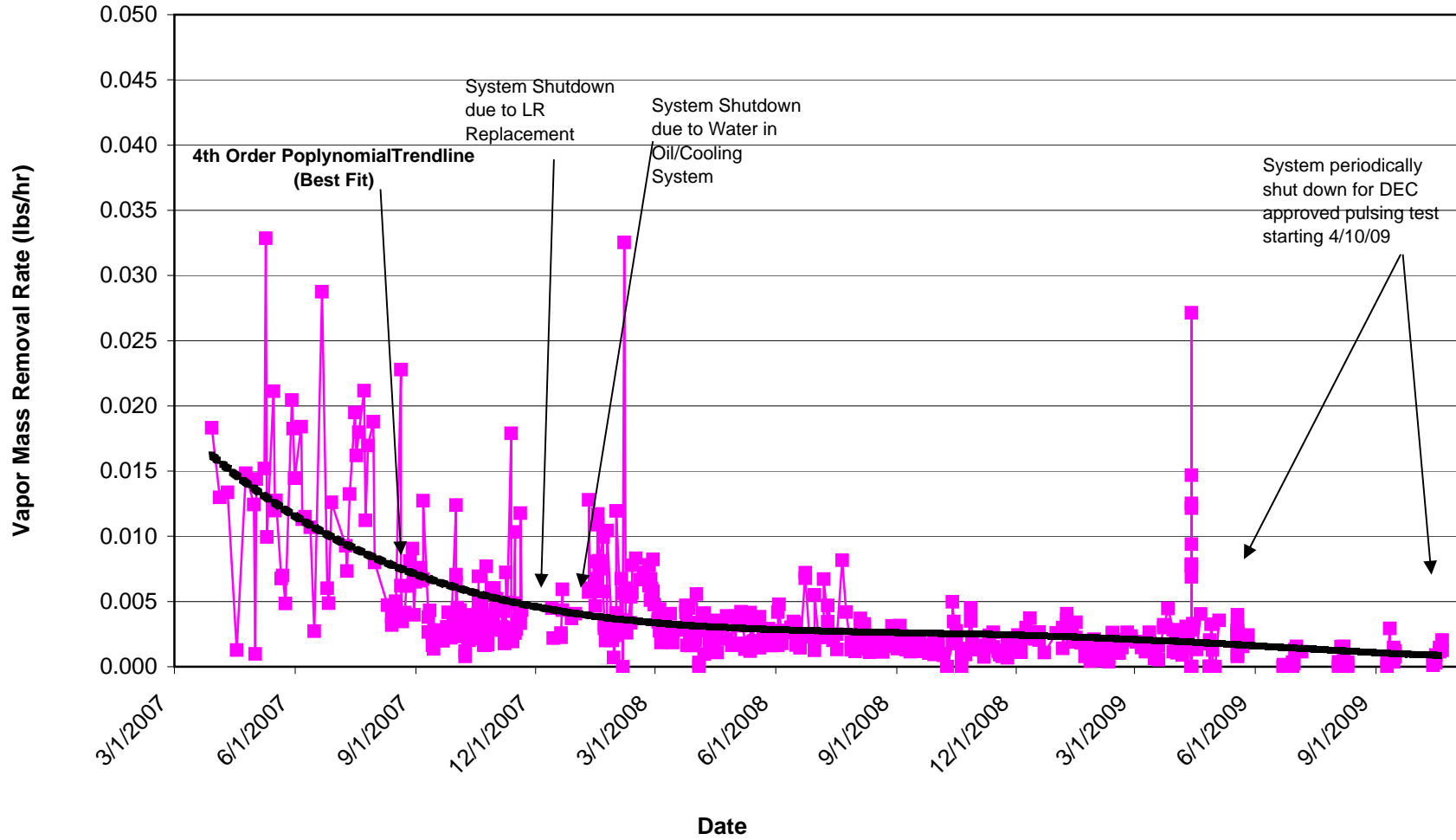


Figure 3A

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
October 2009

Vapor Mass Removal Rate Since October 2008

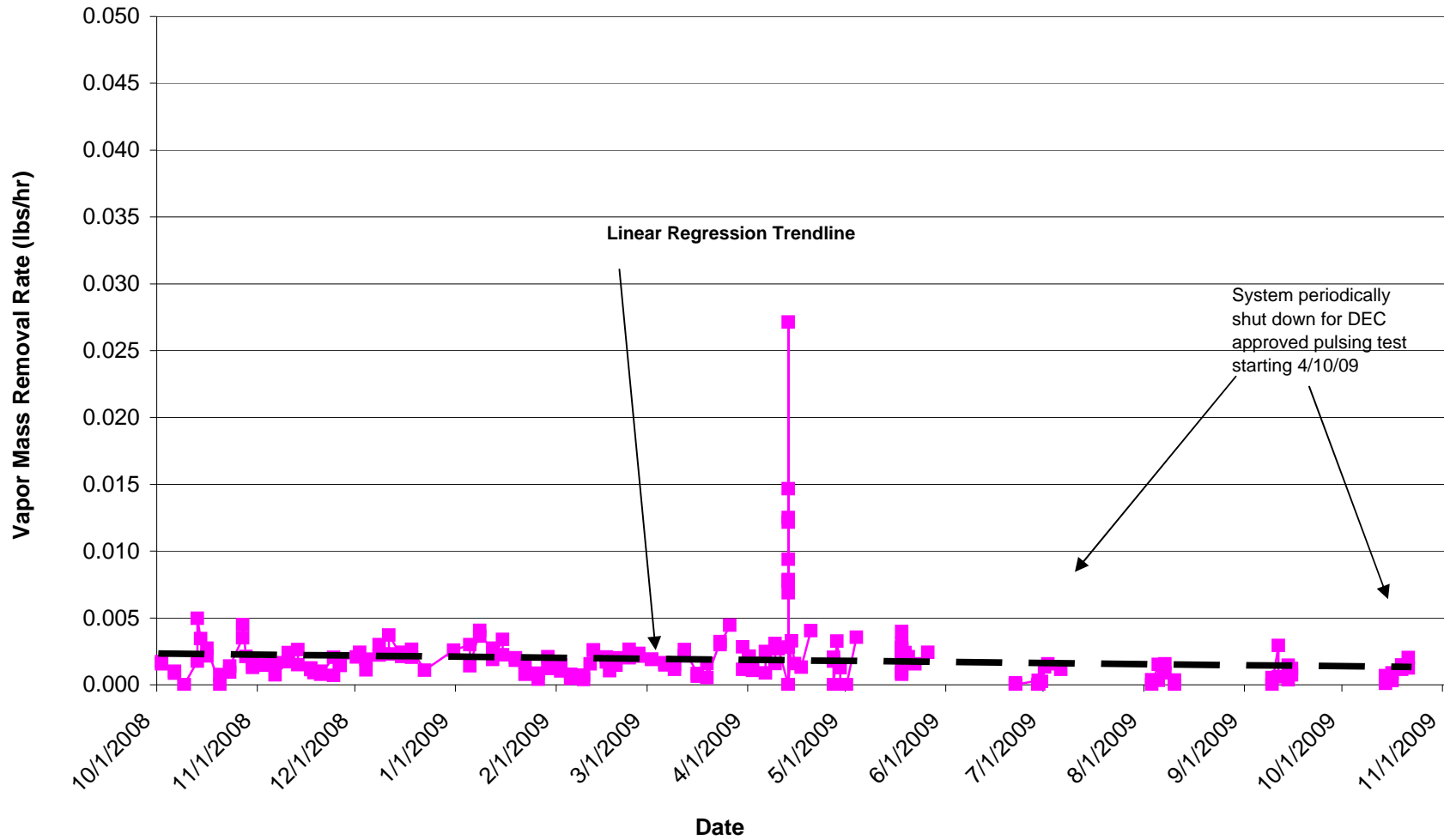
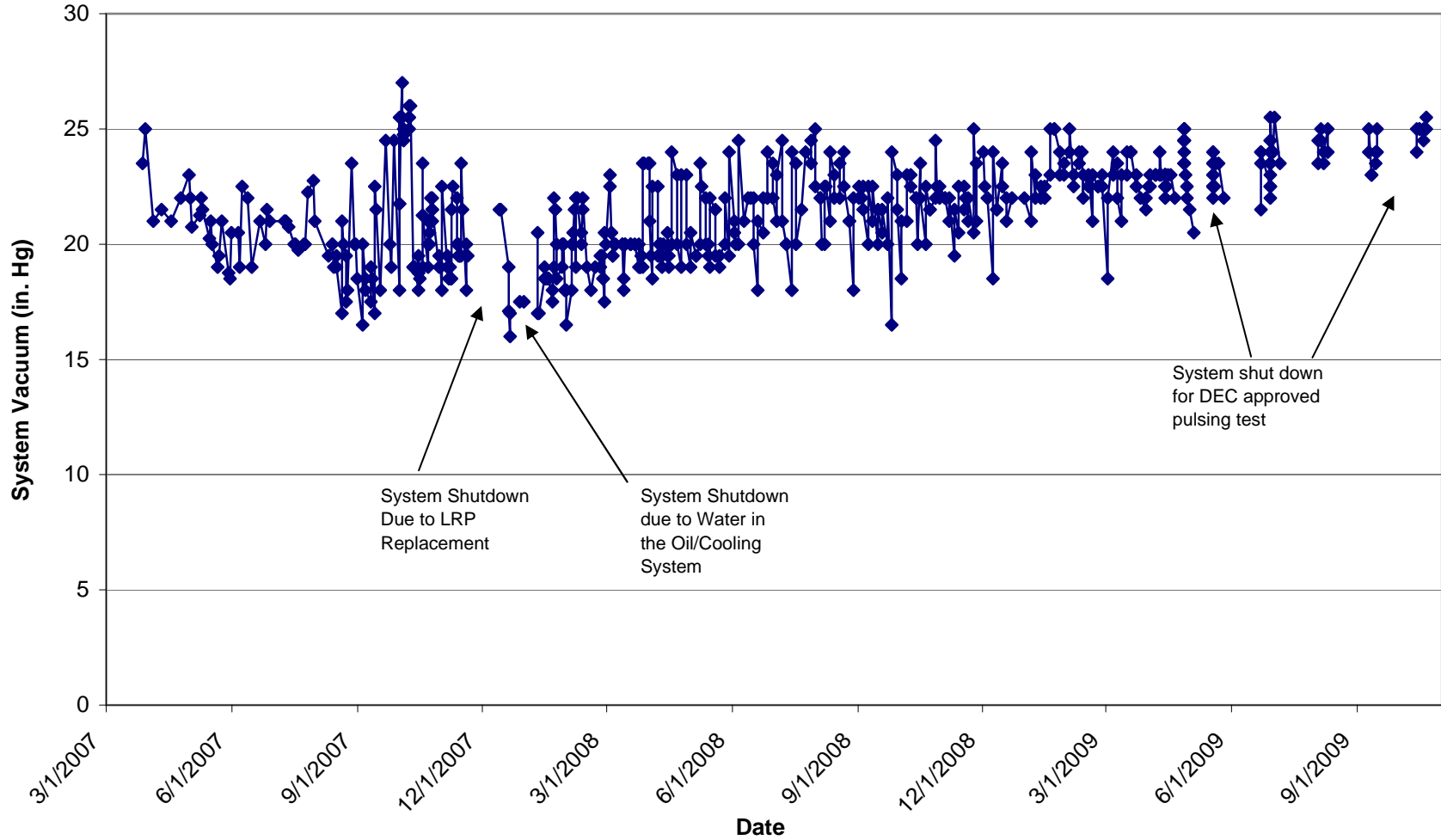


Figure 4

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
October 2009

System Vacuum



-Down time greater than 7 days identified on chart

Figure 5

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
October 2009

System Vapor Flow Rate

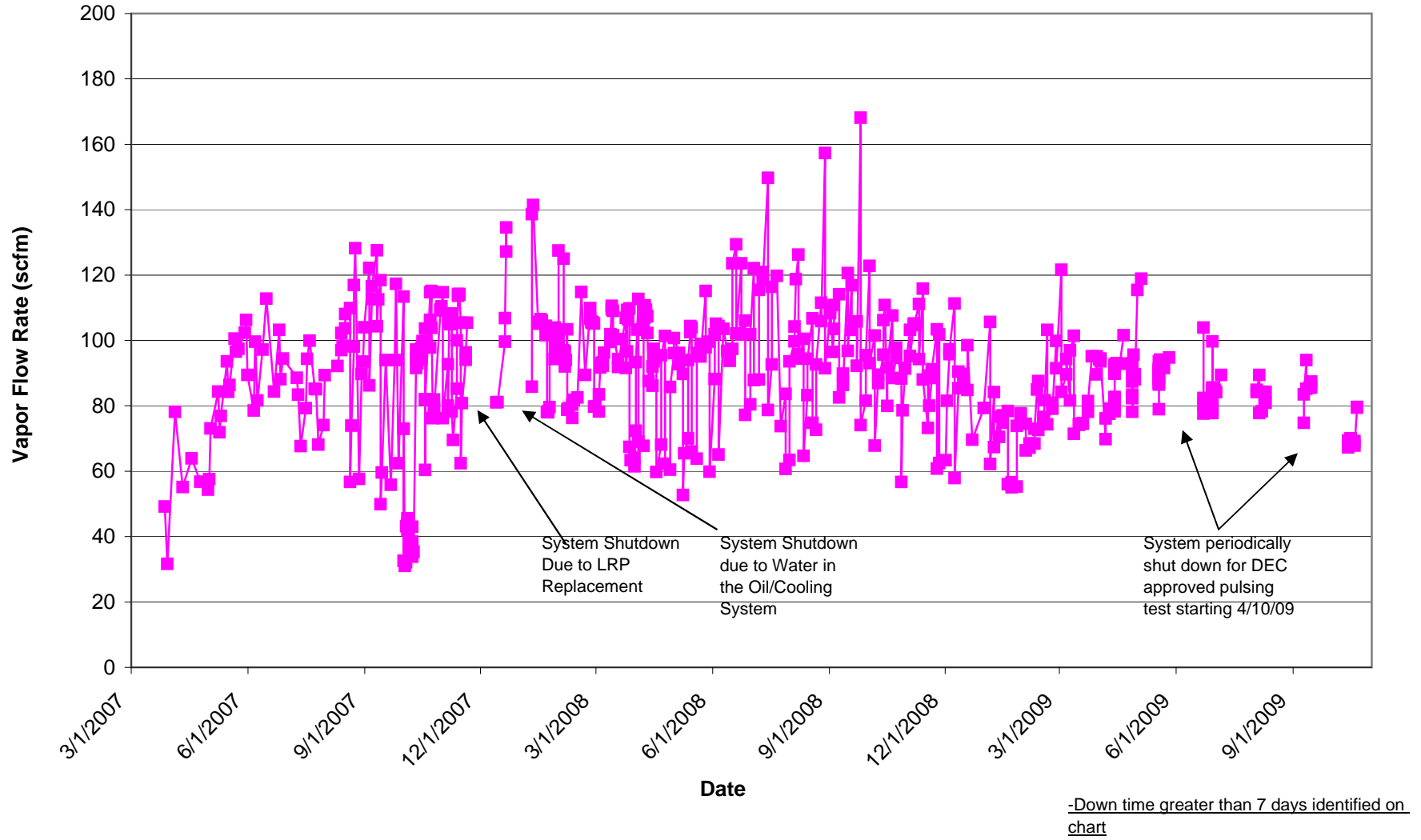


Figure 6

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
October 2009

Total MeCl Mass Removed (Ground Water)

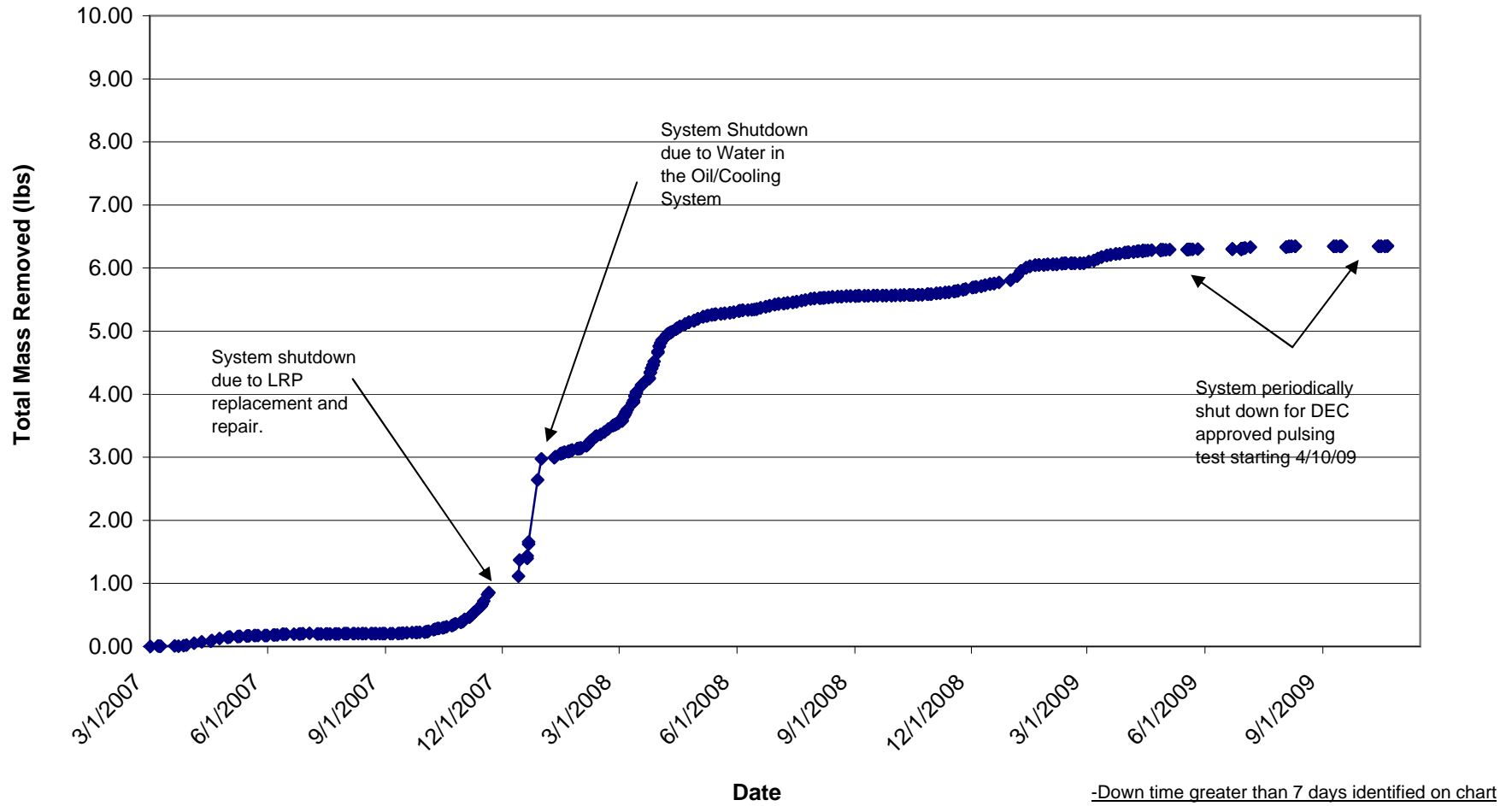
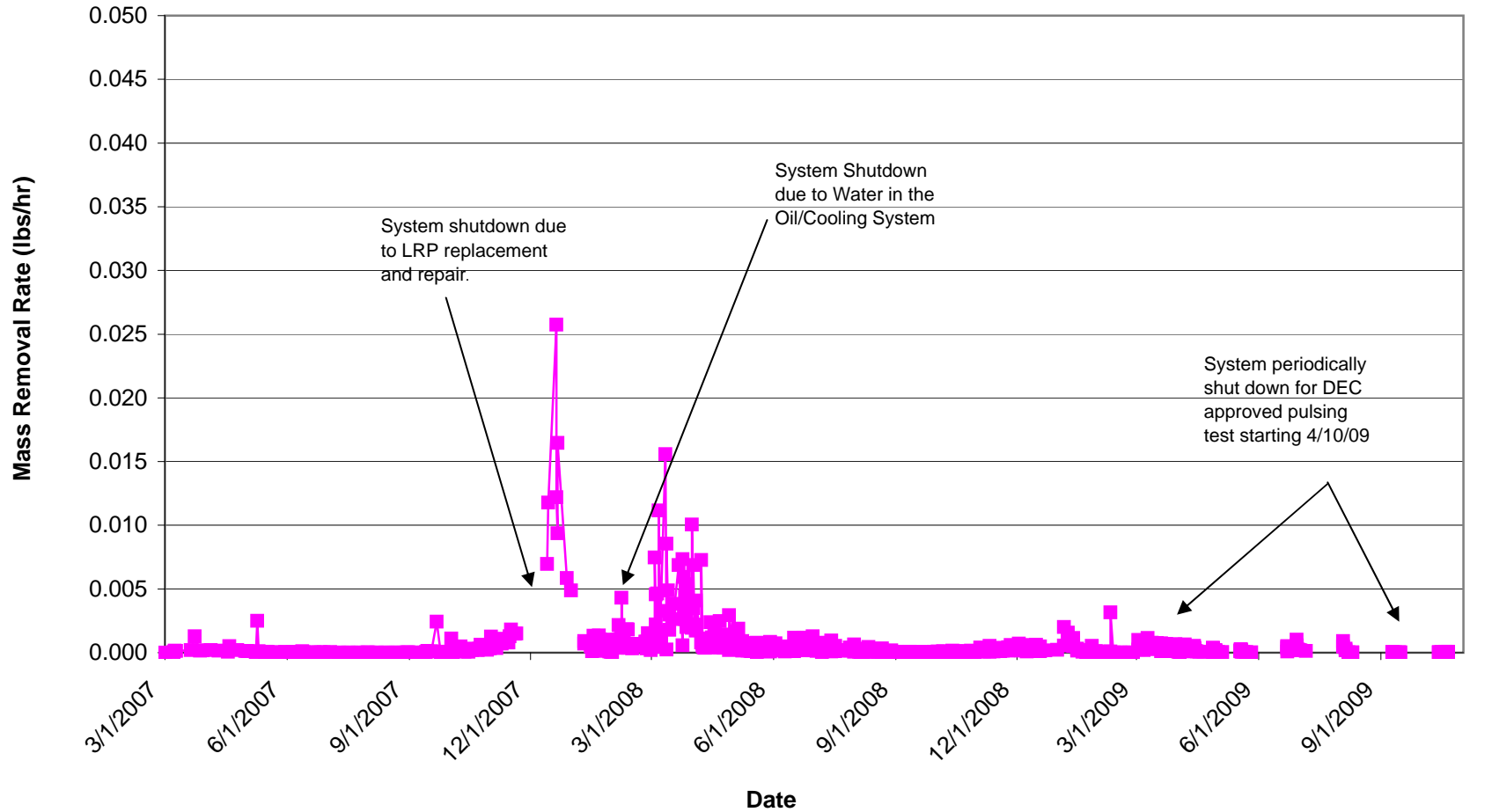


Figure 7

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
October 2009

MeCl Mass Removal Rate (Ground Water)



-Down time greater than 7 days identified on chart

Figure 8

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
October 2009

Cumulative Ground Water Flow

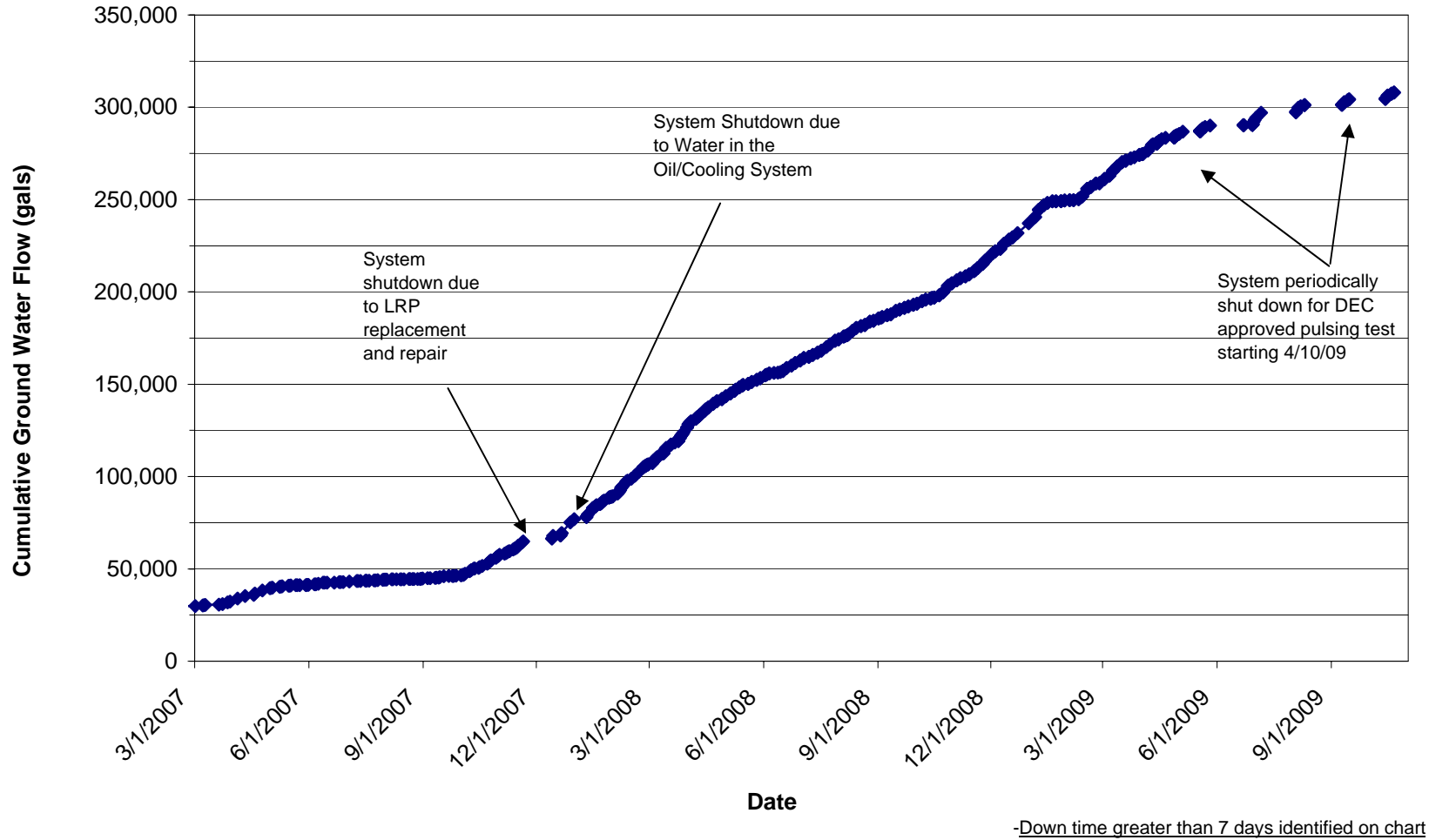
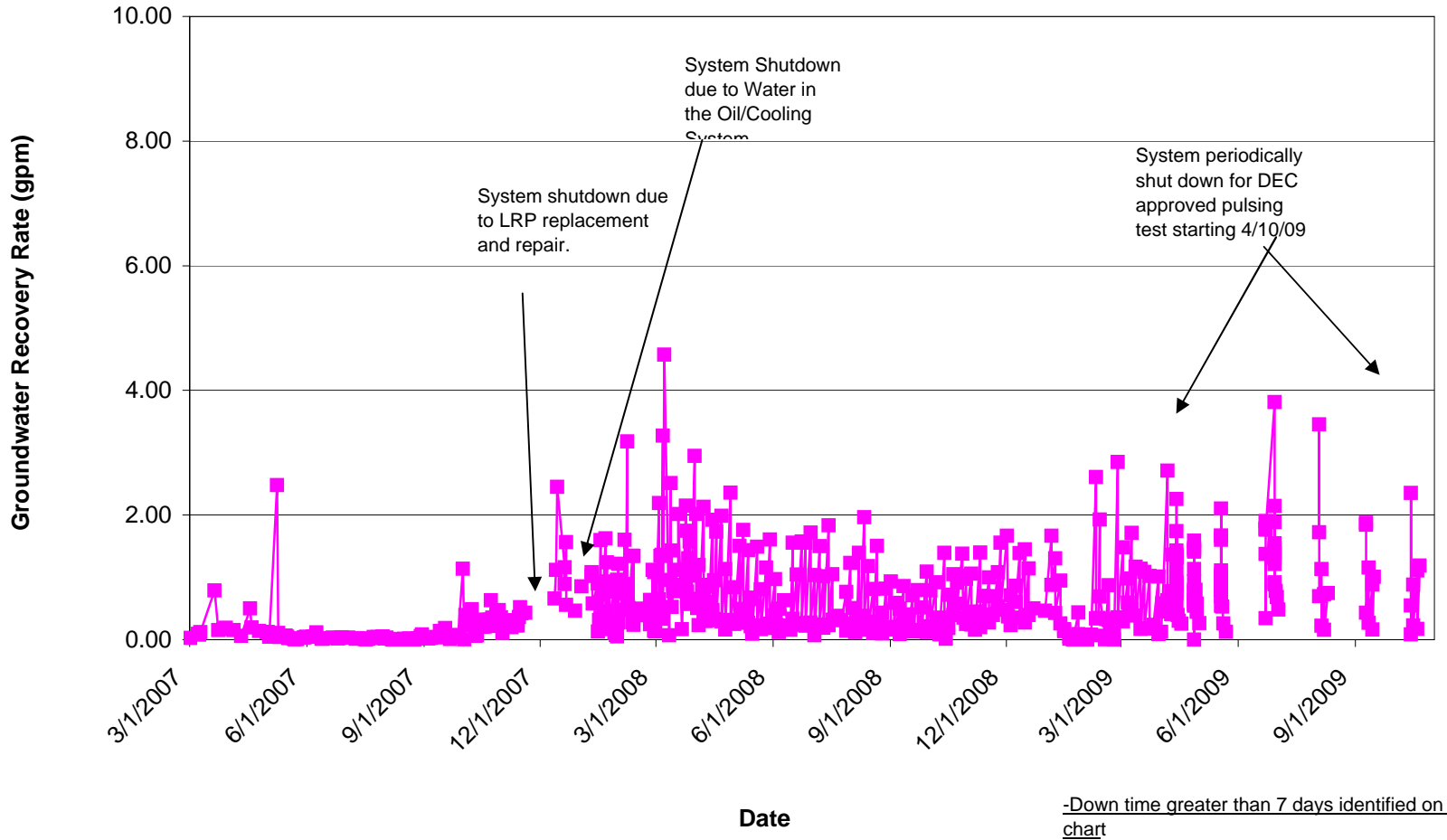


Figure 9

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
October 2009

Ground Water Recovery Rate



Volatile Analysis Report for Water

Client: Quantum Management Group

Client Job Site:	MPRS @ UCB Jefferson Rd.	Lab Project Number:	09-3820
Client Job Number:	N/A	Lab Sample Number:	11707
Field Location:	PreBT / Inf 1,2,3 Comp	Date Sampled:	10/16/2009
Field ID Number:	N/A	Date Received:	10/16/2009
Sample Type:	Water	Date Analyzed:	10/19/2009

Liquid Influent

Compounds	Results in ug / L
Acetone	ND< 25.0
Amyl Acetate	ND< 62.5
Benzene	ND< 1.75
2-Butanone	ND< 25.0
Carbon disulfide	ND< 12.5
Chloroform	ND< 5.00
Chloromethane	ND< 5.00
cis-1,2-Dichloroethene	ND< 5.00
Ethyl acetate	ND< 62.5
Isopropyl acetate	ND< 62.5
Methylene chloride	104
m,p-Xylene	ND< 5.00
o-Xylene	ND< 5.00


ELAP Number 10958

Method: EPA 624

Data File: V69534.D

Comments: ND denotes Non Detect
ug / L = microgram per Liter

Signature: _____


Bruce Hoogesteger: Technical Director

Volatile Analysis Report for Air

Client: Quantum Management Group

Client Job Site:	MPRS @ UCB Jefferson Rd	Lab Project Number:	09-3820
Client Job Number:	N/A	Lab Sample Number:	11708
Field Location:	SP-102 Tedlar Bag	Date Sampled:	10/16/2009
Field ID Number:	N/A	Date Received:	10/16/2009
Sample Type:	Air	Date Analyzed:	10/23/2009

Vapor Influent

Compound	Results in PPBv	Results in ug / m3
Acetone	ND< 4,220	ND< 10,000
Benzene	ND< 627	ND< 2,000
2-Butanone	ND< 3,400	ND< 10,000
Carbon disulfide	ND< 643	ND< 2,000
Chloroform	ND< 414	ND< 2,000
Chloromethane	ND< 978	ND< 2,000
cis-1,2-Dichloroethene	ND< 509	ND< 2,000
Methylene chloride	ND< 1,460	ND< 5,000
m,p-Xylene	ND< 461	ND< 2,000
o-Xylene	ND< 461	ND< 2,000

ELAP Number 10958

Method: EPA 8260B
Modified for Tedlar Bag

Data File: V69653.D

Comments: ND denotes Non Detect
PPBv = Parts per Billion volume
ug / m3 - Microgram per cubic meter.

Signature: _____

Bruce Hoogesteger: Technical Director



December 10, 2009

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: Monthly Progress Report – November 2009
755 Jefferson Road Facility – Henrietta, New York
NYSDEC VCP Number V00126-8

***Key Actions
This Period:***

- **November 1 – November 30, 2009.** The system was intermittently operational in accordance with the NYSDEC approved pulsing plan.

Operations Metrics (November 16 – November 23)

- Operational Time: 169 out of a scheduled 169 hours of operation.
- Uptime Efficiency: 100%
- Volume of Groundwater Treated: 3,543 gallons.
 - Discharged to: The sanitary sewer system.
- Total estimated VOC mass recovered to date: 138.0 lbs.
- Total estimated VOC mass recovered during November: 0.13 lbs.
- Mean estimated VOC mass removal rate for November 2009 versus October 2009: 0.0008 versus 0.0012 lbs/hr.
- General weather conditions: Average precipitation and warmer temperatures as compared to historical data.

Tables, Figures and Graphs

- Table 1: November Treated Waste Water Flow/Vapor Monitoring Data.
- Table 2: November Recovery Well Rotation Data.
- Figures 1-9: Remedial Effectiveness and Efficiency Platform (REEP) graphs
- Figures 2A and 3A: Selected Remedial Effectiveness and Efficiency Platform (REEP) graphs showing results from March 1, 2008 to present.

***Problems/
Resolutions:***

- None

***Analytical Data
Received:***

- The November 2009 influent vapor sample and the MPRS influent and effluent samples.

***Documents
Submitted:***

- Monthly Progress Report for October 2009 dated November 10, 2009.

**Anticipated
Actions –
December
2009:**

- Continue NYSDEC approved pulsing program until permission is granted to terminate system operation.

Comments:

- The attached REEP information is to be utilized as a subjective representation of the overall effectiveness/performance of the system as we are using discontinuous data and PID measurements for the removal calculations. We do not intend this tool as a definitive summary of recovered mass.
- MPRS operation and efficiency, inclusive of the replacement LRP pump and associated upgrades and maintenance, will continue to be monitored.
- Submittal of the Post Remedial Construction OM&M FER, Closure Request and Certification and revised Site Management Plan is anticipated in January 2009.

**NYSDEC-
Approved Field
Decisions:**

- Continuation of pulsing of MPRS system in accordance with the procedure presented to NYSDEC.

If you have any questions regarding this monthly report or progress on the project, please don't hesitate to contact me at 513-314-7543 or rbethel@qmg-inc.com.

Sincerely,
QUANTUM MANAGEMENT GROUP, INC.



Rick Bethel
Senior Associate

Attachments

cc:

Mr. Jeffrey M. Kosmala, P.E. (MCDOH)
Mr. Michael Bogdan (Sanofi-Aventis)
Mr. Kevin Bruno (RFBC Law)
Mr. Mark Byrne, P.E. (Town of Henrietta)
Ms. Libby Ford, (Nixon Peabody)
Mr. Greg Light (UCB)
Mr. George Hollerbach, P.E. (Quantum)

Ms. Melissa Menetti (NYSDOH)
Mr. David Panipinto (UCB)
Mr. Bart Putzig, P.E. (NYSDEC)
Mr. Sean Keenan (MCDES)
Mr. John Lang, P.E. (Quantum)

**TABLE 1 - TREATED WASTE WATER FLOW/VAPOR MONITORING DATA
MCA REMEDIATION SYSTEM
755 JEFFERSON ROAD, HENRIETTA, NEW YORK
NYSDEC VCP NUMBER V00126-8
November 2009**

Date	Time ¹	Cumulative Hours ²	Total Flow ³ Gallons	Flow Rate ⁴ Gal/Min	Cumulative Gallons ^{5,6}	Influent PID (ppm)	Effluent PID (ppm)
10/21/2009	11:06	39244.22	134	1.2	308,050	1.8	0.0
11/16/2009	10:37	39244.53	29	1.6	308,079	0.5	0.0
11/16/2009	12:31	39246.46	221	1.9	308,300	0.4	0.0
11/18/2009	9:10	39291.08	1,259	0.5	309,559	0.8	0.0
11/18/2009	11:30	39293.44	170	1.2	309,729	0.5	0.0
11/20/2009	9:33	39339.47	663	0.2	310,392	0.6	0.0
11/20/2009	11:43	39341.61	168	1.3	310,560	0.7	0.0
11/23/2009	9:18	39411.21	886	0.2	311,446	0.9	0.0
11/23/2009	11:17	39413.22	147	1.2	311,593	0.5	0.0

¹Time of day (in military time) data was collected.

²Cumulative Hours represents the number of run-hours since MCA remediation system start-up on 12 July 2006.

³Total Flow in Gallons represents the flow that occurred since the time the last measurement was collected, as indicated in the previous row of the table.

⁴Flow Rate in Gallons/Minute represents the average flow rate since the time the last measurement was collected, as indicated in the previous row of the table.

⁵Cumulative Gallons represents the number of gallons of water treated by the MCA remediation system since start-up on 12 July 2006.

⁶Totalizer Flow readings collected from newly installed totalizer beginning October 2, 2007.

⁷n/a: data not available, Kleinfelder personnel on site was present for GWS only and was not trained to safely operate the system/collect data.

TABLE 2 - RECOVERY WELL ROTATION DATA
MCA REMEDIATION SYSTEM
755 JEFFERSON ROAD, HENRIETTA, NEW YORK
NYSDEC VCP NUMBER V00126-8
November 2009

Date	Well Rotation Clusters								
	EXSB-2	MW-D8	MW -21	MW-22	MW-20A	MW-20B	RW-6	RW-5	RW-4
November 1-15	System shut down as part of NYSDEC approved pulsing program								
November 16-23		X						X	X
November 24-30	System shut down as part of NYSDEC approved pulsing program								

Figure 1
MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
November 2009

Total VOC Mass Removed (Vapor and Ground Water Combined)

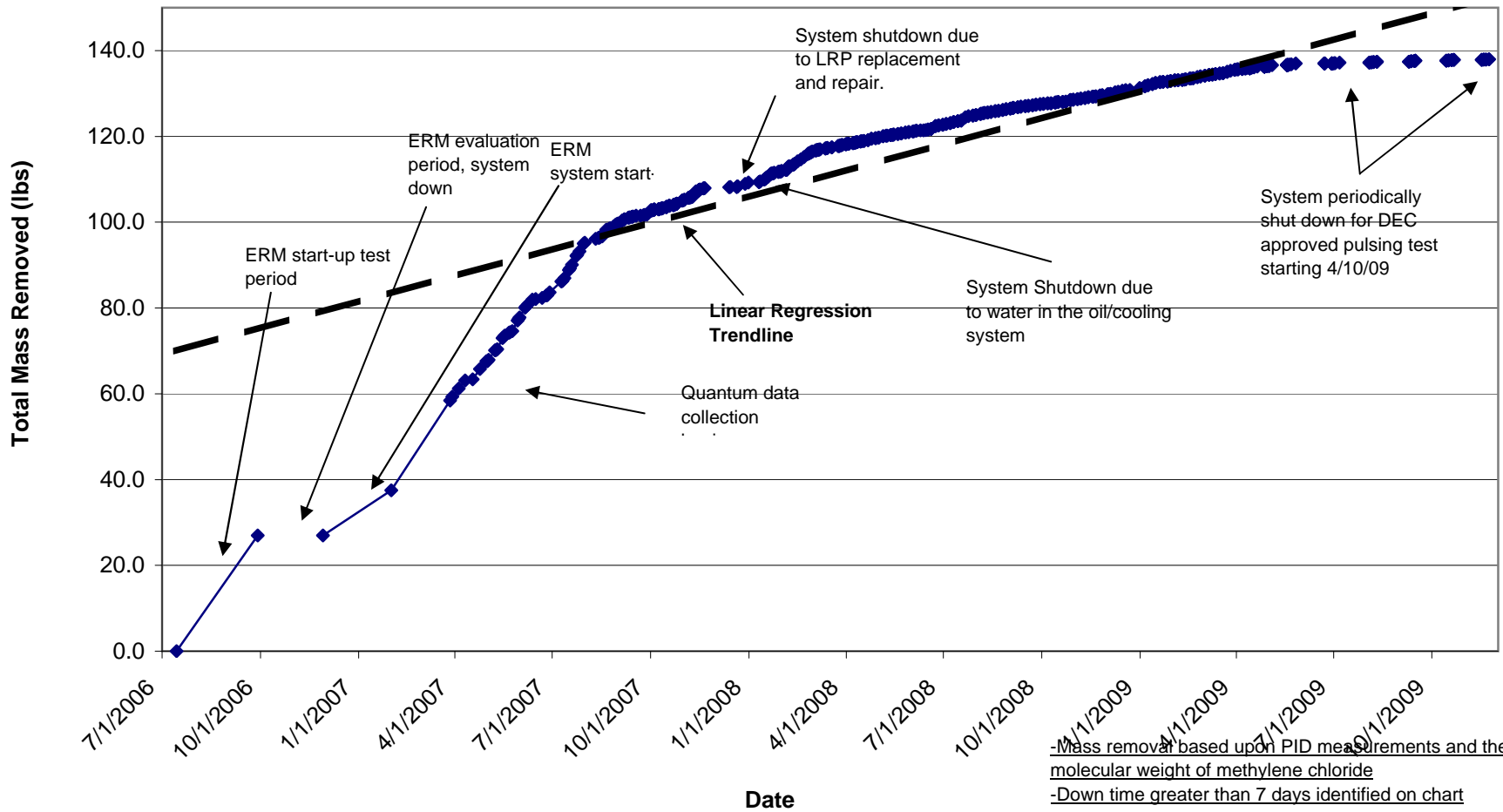


Figure 2
MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
November 2009

Total VOC Mass Removal Rate (Vapor & Ground Water Combined)

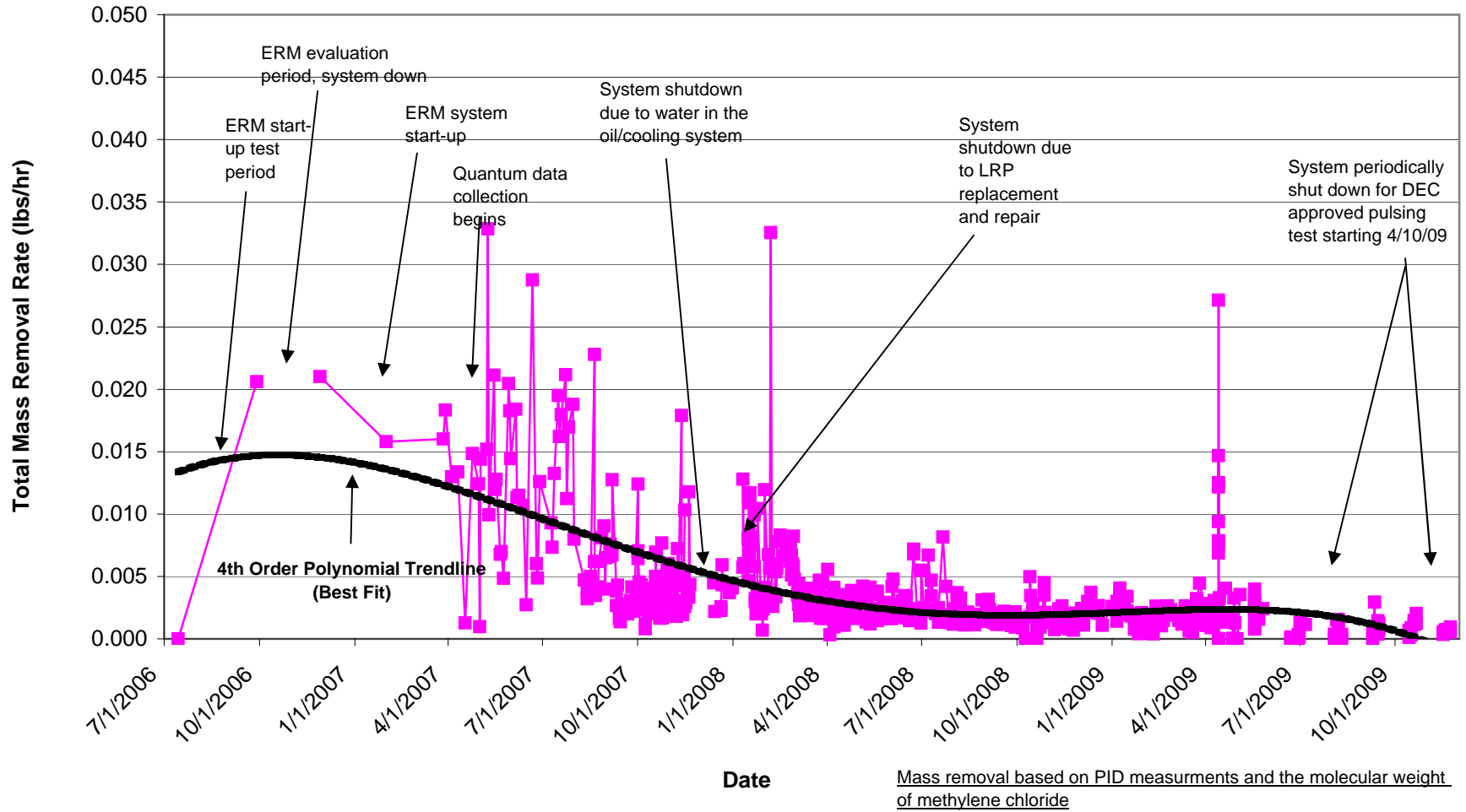


Figure 2A

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
November 2009

Total VOC Mass Removal Rate (Vapor & Ground Water Combined) Since November 2008

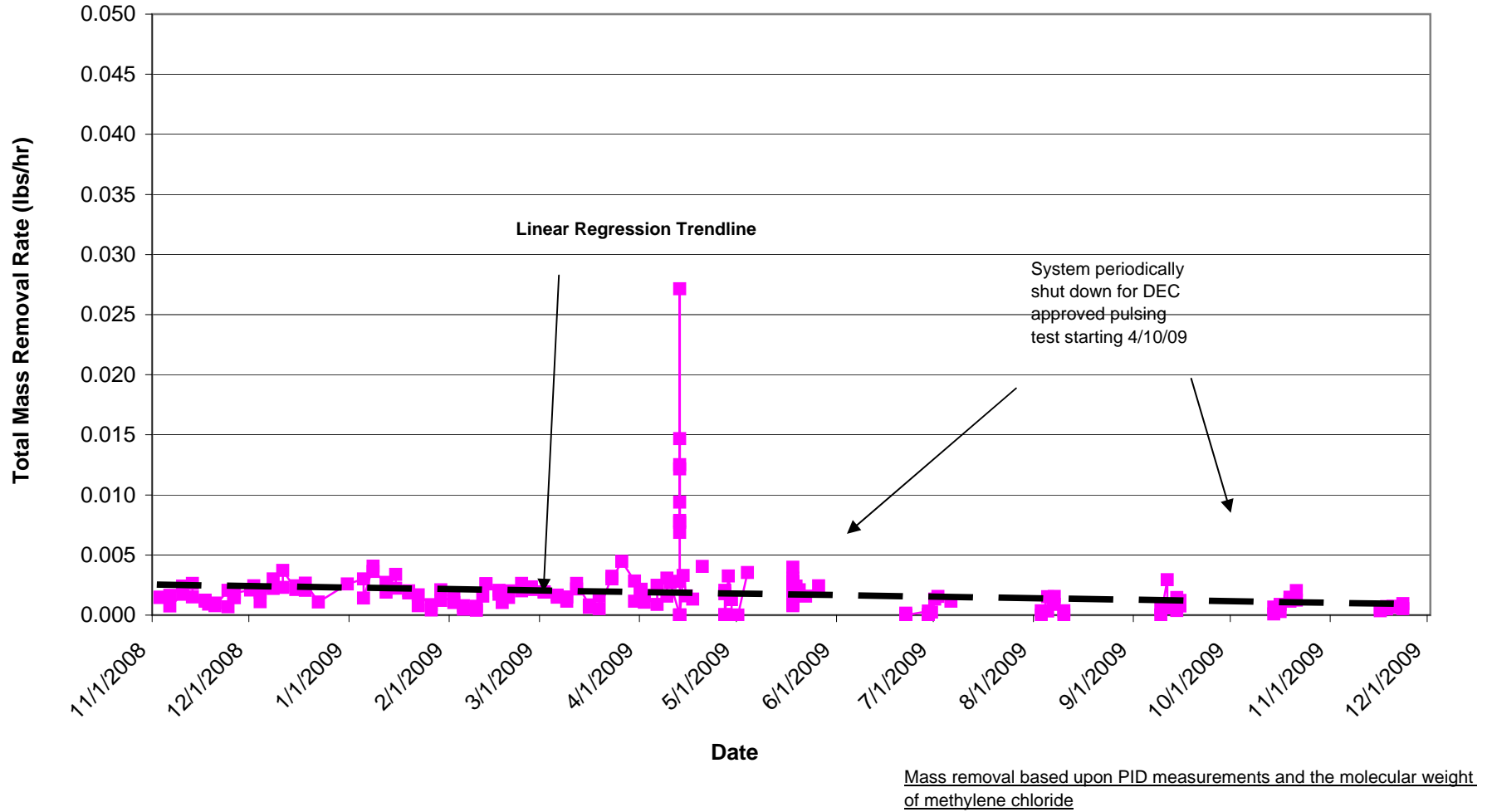


Figure 3
MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
November 2009

Vapor Mass Removal Rate

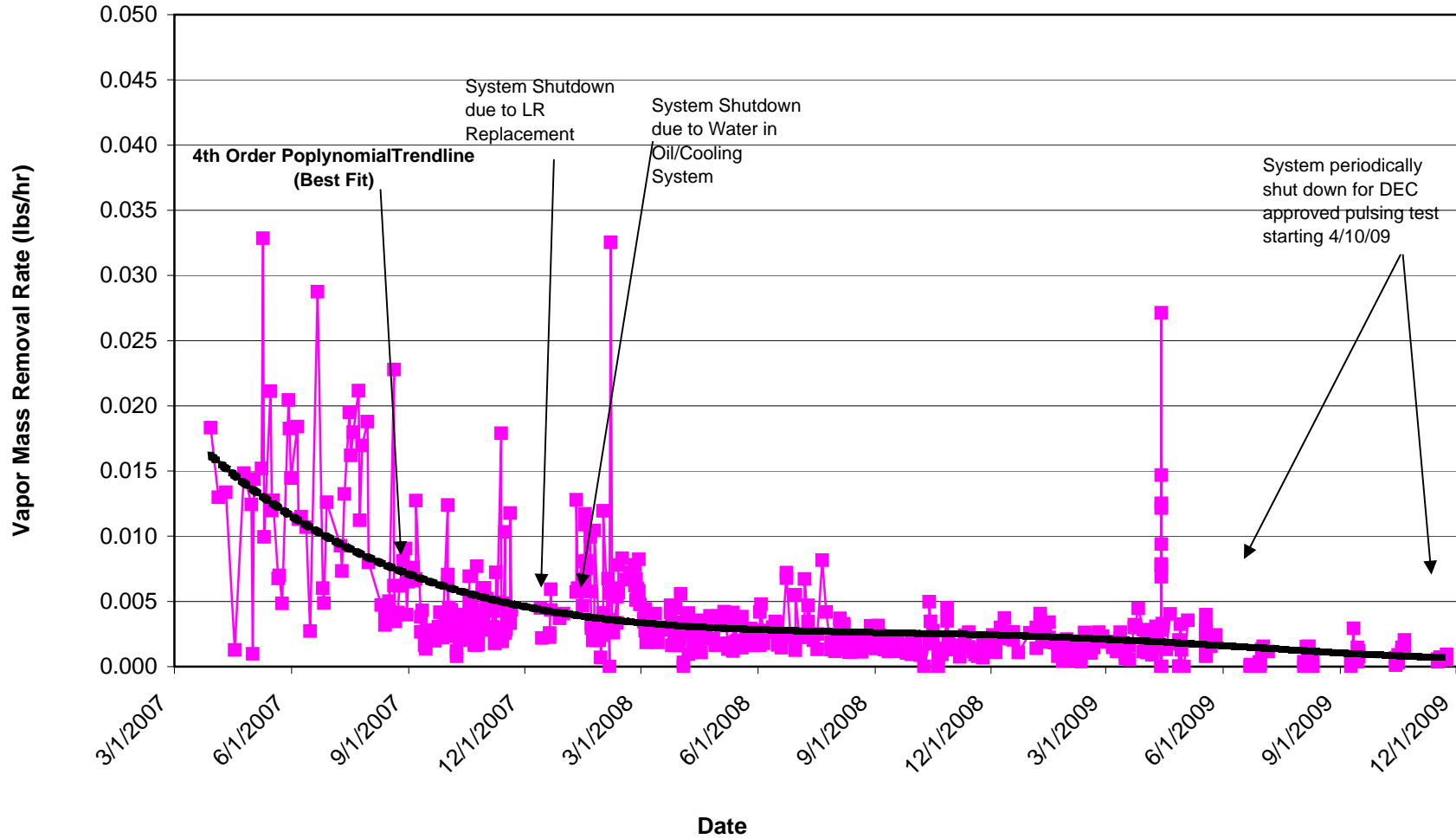


Figure 3A

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
November 2009

Vapor Mass Removal Rate Since November 2008

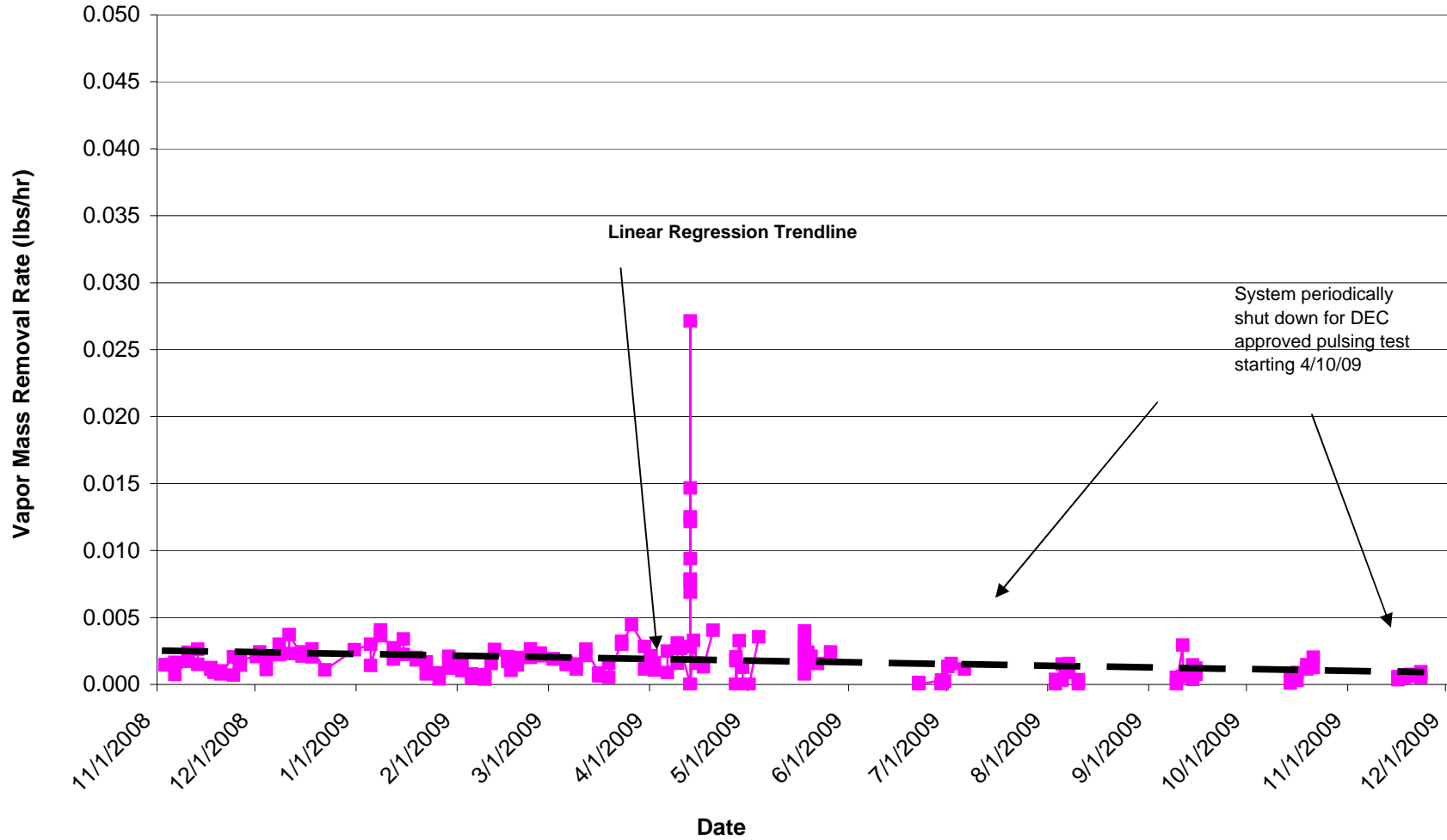
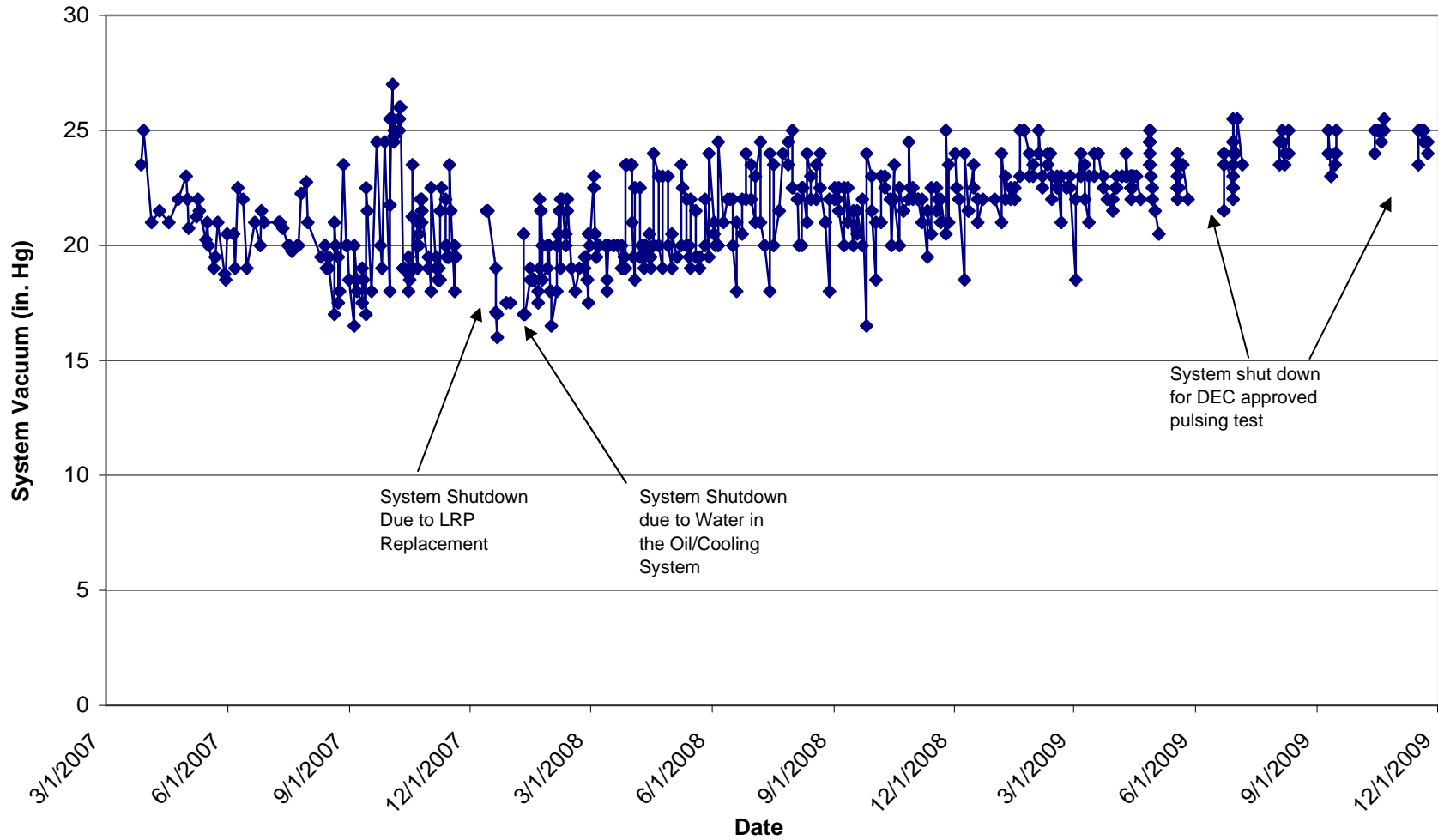


Figure 4

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
November 2009

System Vacuum



-Down time greater than 7 days identified on chart

Figure 5

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
November 2009

System Vapor Flow Rate

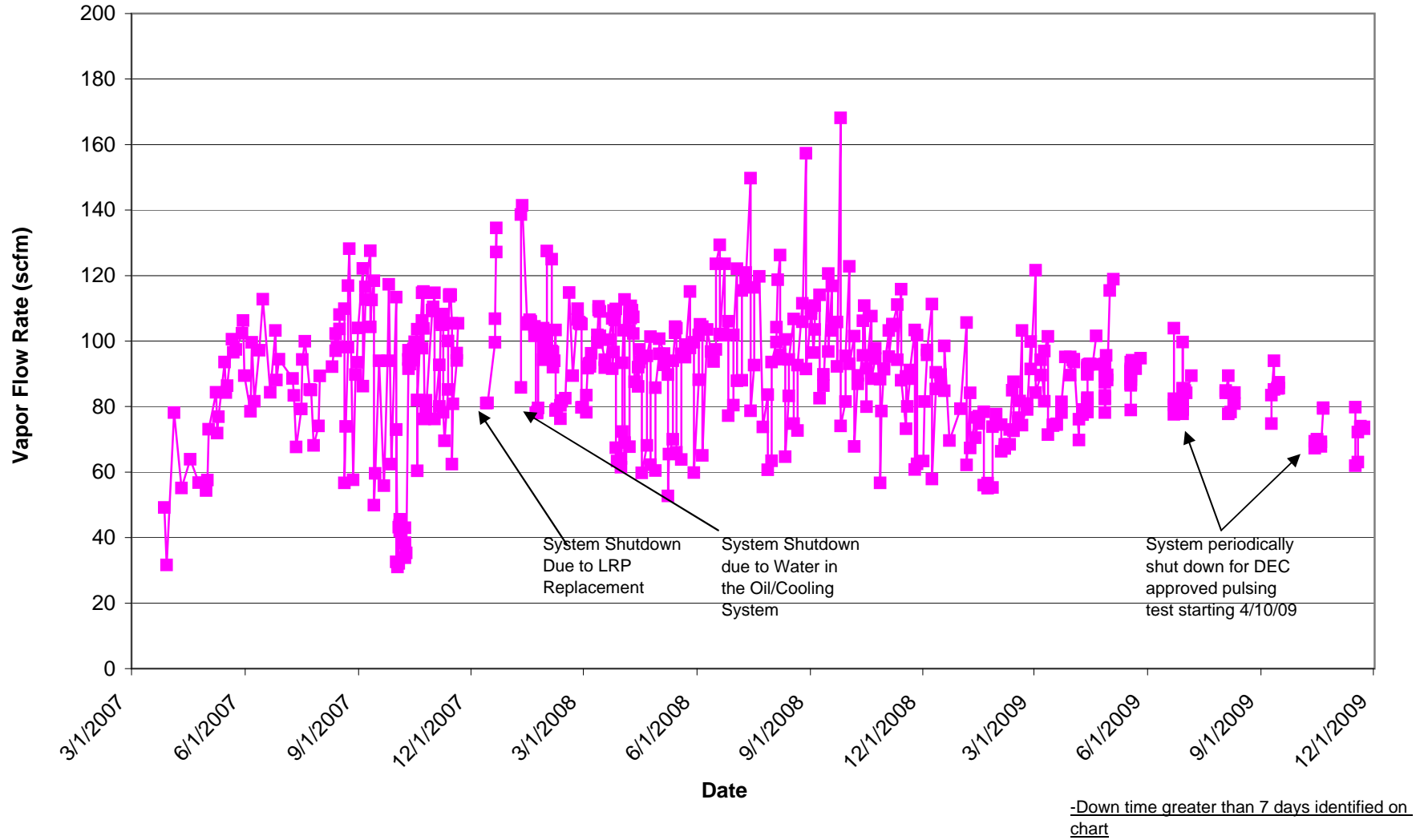


Figure 6

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
November 2009

Total MeCl Mass Removed (Ground Water)

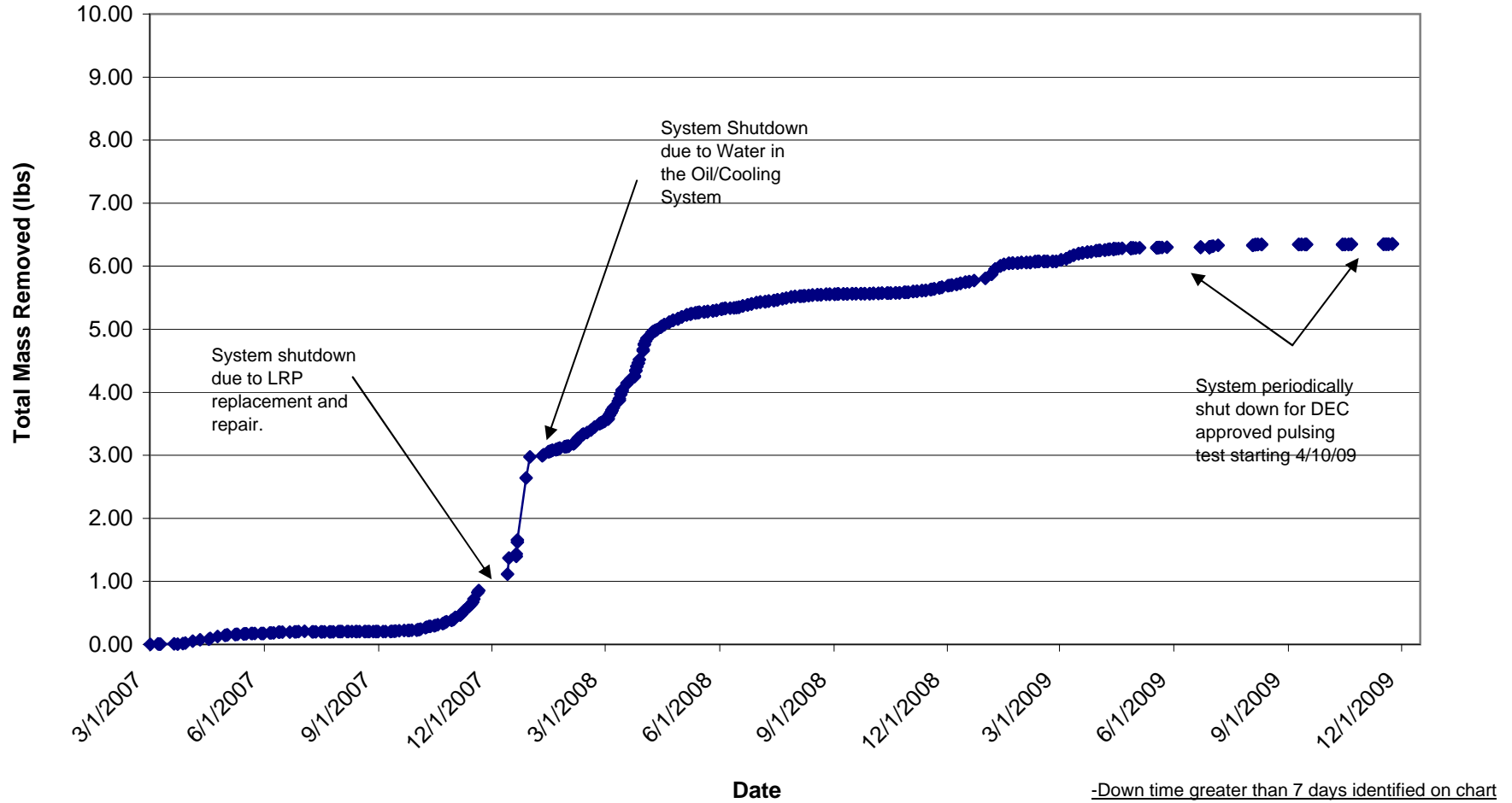
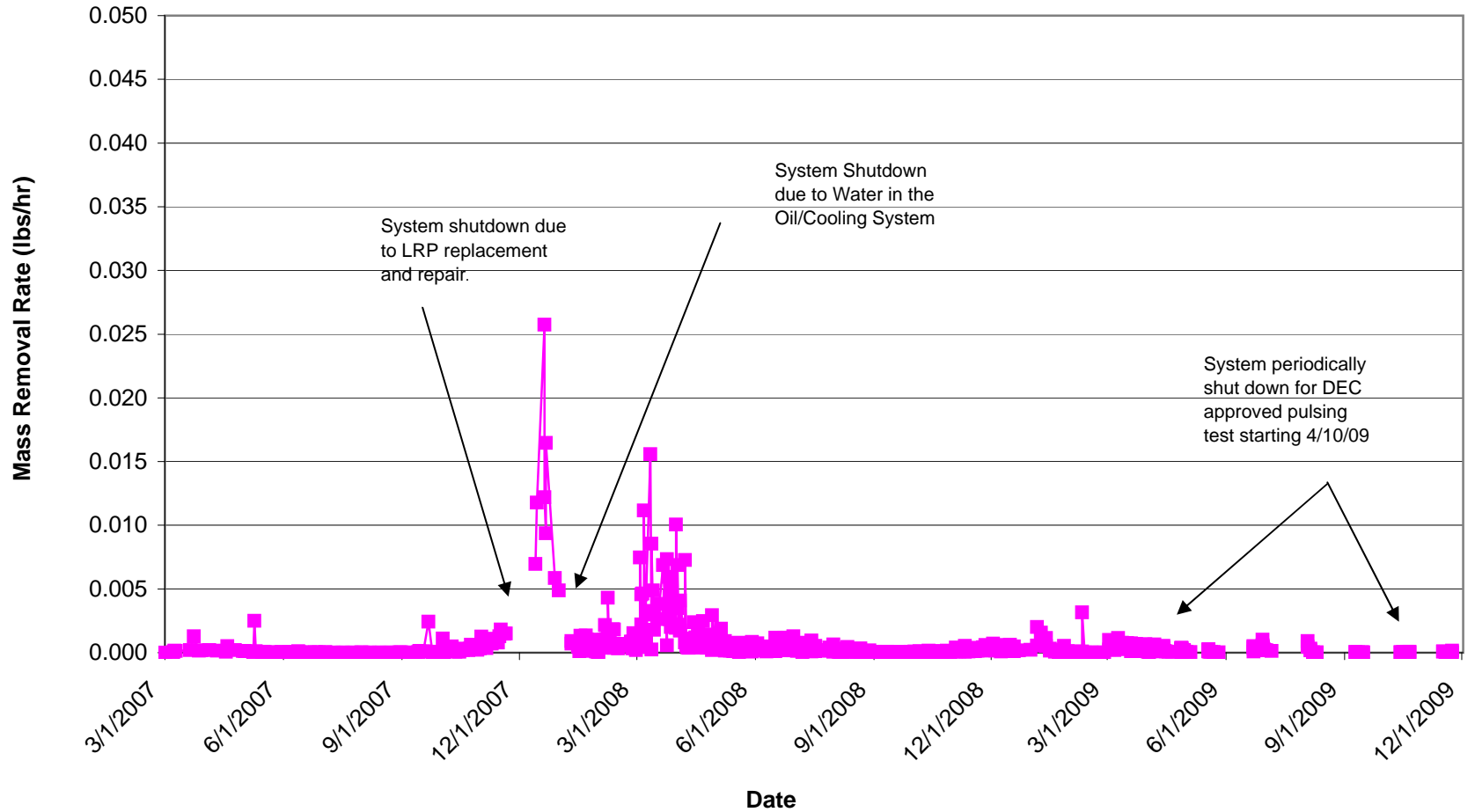


Figure 7

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
November 2009

MeCl Mass Removal Rate (Ground Water)



-Down time greater than 7 days identified on chart

Figure 8

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
November 2009

Cumulative Ground Water Flow

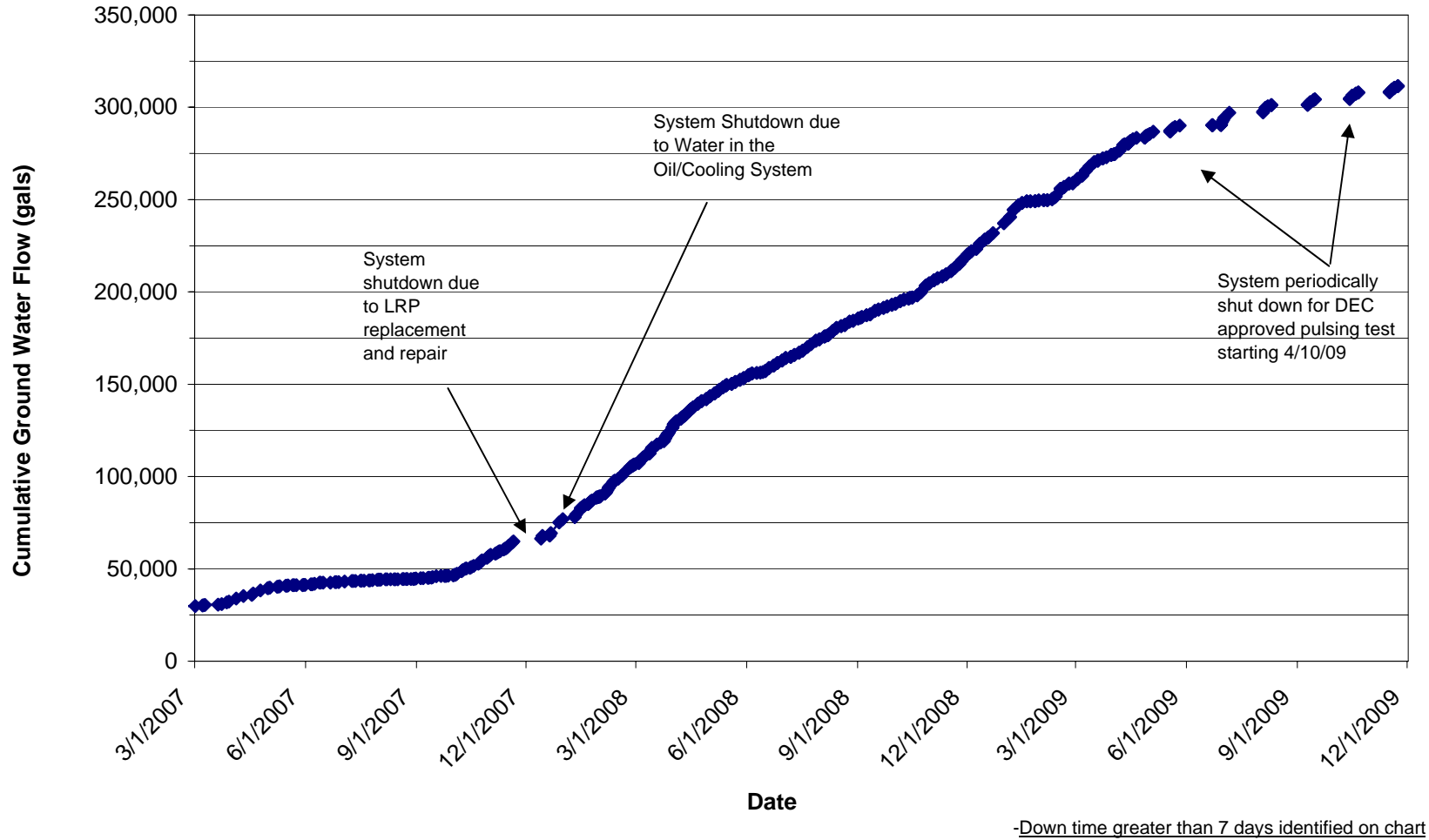
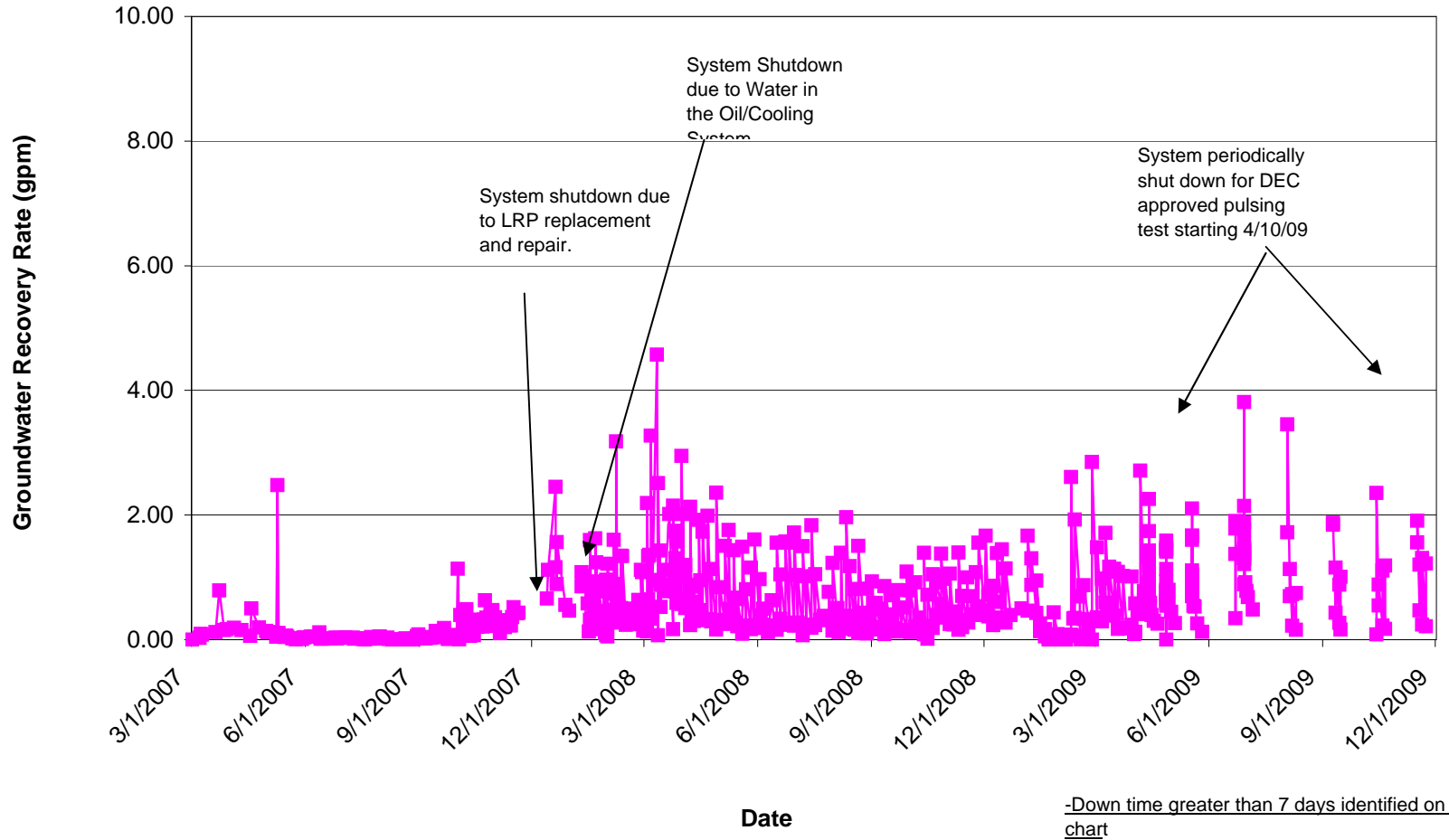


Figure 9

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
November 2009

Ground Water Recovery Rate





PARADIGM
ENVIRONMENTAL SERVICES, INC.

Analytical Report Cover Page

Quantum Management Group

For Lab Project # 09-4382

Issued December 3, 2009

This report contains a total of 4 pages

The reported results relate only to the samples as they have been received by the laboratory.

Any noncompliant QC parameters having impact on the data are flagged or documented on the final report.

All soil/sludge samples have been reported on a dry weight basis, unless qualified "reported as received". Other solids are reported as received.

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The Chain of Custody provides additional information, including compliance with sample condition requirements upon receipt. Sample condition requirements are defined under the 2003 NELAC Standard, sections 5.5.8.3.1 and 5.5.8.3.2.

NYSDOH ELAP does not certify for all parameters. Paradigm Environmental Services or the indicated subcontracted laboratory does hold certification for all analytes where certification is offered by ELAP unless otherwise specified.

Data qualifiers are used, when necessary, to provide additional information about the data. This information may be communicated as a flag or as text at the bottom of the report. Please refer to the following list of frequently used data flags and their meaning:

"ND" = analyzed for but not detected.

"E" = Result has been estimated, calibration limit exceeded.

"D" = Duplicate results outside QC limits. May indicate a non-homogenous matrix.

"M" = Matrix spike recoveries outside QC limits. Matrix bias indicated.

"B" = Method blank contained trace levels of analyte. Refer to included method blank report.

Volatile Analysis Report for Water

Client: Quantum Management Group

Client Job Site:	MPRS @ UCB Jefferson Rd.	Lab Project Number:	09-4382
Client Job Number:	N/A	Lab Sample Number:	13295
Field Location:	PreBt / Inf. 1,2,3 Comp	Date Sampled:	11/23/2009
Field ID Number:	N/A	Date Received:	11/23/2009
Sample Type:	Water	Date Analyzed:	12/02/2009

Liquid Influent

Compounds	Results in ug / L
Acetone	ND< 10.0
Amyl Acetate	ND< 25.0
Benzene	ND< 0.700
2-Butanone	ND< 10.0
Carbon disulfide	ND< 5.00
Chloroform	ND< 2.00
Chloromethane	ND< 2.00
cis-1,2-Dichloroethene	ND< 2.00
Ethyl acetate	ND< 25.0
Isopropyl acetate	ND< 25.0
Methylene chloride	254
m,p-Xylene	ND< 2.00
o-Xylene	ND< 2.00

ELAP Number 10958

Method: EPA 624

Data File: V70714.D

Comments: ND denotes Non Detect
ug / L = microgram per Liter

Signature: _____


Bruce Hoogesteger: Technical Director

**Volatile Analysis Report for Air**Client: **Quantum Management Group**

Client Job Site: MPRS @ UCB
 Jefferson Rd.
 Client Job Number: N/A
 Field Location: SP-102 Tedlar Bag
 Field ID Number: N/A
 Sample Type: Air

Lab Project Number: 09-4382
 Lab Sample Number: 13296
 Date Sampled: 11/23/2009
 Date Received: 11/23/2009
 Date Analyzed: 12/03/2009

Vapor Influent

Compound	Results in PPBv	Results in ug / m3
Acetone	ND< 4,220	ND< 10,000
Benzene	ND< 627	ND< 2,000
2-Butanone	ND< 3,400	ND< 10,000
Carbon disulfide	ND< 643	ND< 2,000
Chloroform	ND< 414	ND< 2,000
Chloromethane	ND< 978	ND< 2,000
cis-1,2-Dichloroethene	ND< 509	ND< 2,000
Methylene chloride	ND< 1,460	ND< 5,000
m,p-Xylene	ND< 461	ND< 2,000
o-Xylene	ND< 461	ND< 2,000

ELAP Number 10958

Method: EPA 8260B
Modified for Tedlar Bag

Data File: V70769.D

Comments: ND denotes Non Detect
 PPBv = Parts per Billion volume
 ug / m3 - Microgram per cubic meter.

Signature: _____

Bruce Hoogesteger, Technical Director



January 11, 2010

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: Monthly Progress Report – December 2009
755 Jefferson Road Facility – Henrietta, New York
NYSDEC VCP Number V00126-8

***Key Actions
This Period:***

- **December 1 – December 31, 2009.** The system was intermittently operational in accordance with the NYSDEC approved pulsing plan.

Operations Metrics (December 9 – December 16)

- Operational Time: 170 out of a scheduled 170 hours of operation.
- Uptime Efficiency: 100%
- Volume of Groundwater Treated: 4,305 gallons.
 - Discharged to: The sanitary sewer system.
- Total estimated VOC mass recovered to date: 138.2 lbs.
- Total estimated VOC mass recovered during December: 0.20 lbs.
- Mean estimated VOC mass removal rate for December 2009 versus November 2009: 0.0012 versus 0.0008 lbs/hr.
- General weather conditions: Average precipitation and average temperatures as compared to historical data.

Tables, Figures and Graphs

- Table 1: November Treated Waste Water Flow/Vapor Monitoring Data.
- Table 2: November Recovery Well Rotation Data.
- Figures 1-9: Remedial Effectiveness and Efficiency Platform (REEP) graphs
- Figures 2A and 3A: Selected Remedial Effectiveness and Efficiency Platform (REEP) graphs showing results from March 1, 2008 to present.

***Problems/
Resolutions:***

- None

***Analytical Data
Received:***

- The December 2009 MPRS liquid influent analytical data.
- The December 2009 MPRS liquid effluent analytical data.
- The December 2009 MPRS vapor influent analytical data.

***Documents
Submitted:***

- Monthly Progress Report for November 2009 dated December 11, 2009.

**Anticipated
Actions –
January
2009:**

- Continue NYSDEC approved pulsing program until permission is granted to terminate system operation.

Comments:

- The attached REEP information is to be utilized as a subjective representation of the overall effectiveness/performance of the system as we are using discontinuous data and PID measurements for the removal calculations. We do not intend this tool as a definitive summary of recovered mass.
- MPRS operation and efficiency, inclusive of the replacement LRP pump and associated upgrades and maintenance, will continue to be monitored.
- Submittal of the Post Remedial Construction OM&M FER, Closure Request and Certification and revised Site Management Plan is anticipated in first quarter of 2010.

**NYSDEC-
Approved Field
Decisions:**

- Continuation of pulsing of MPRS system in accordance with the procedure presented to NYSDEC.

If you have any questions regarding this monthly report or progress on the project, please don't hesitate to contact me at 513-314-7543 or rbethel@qmg-inc.com.

Sincerely,
QUANTUM MANAGEMENT GROUP, INC.



Rick Bethel
Senior Associate

Attachments

cc:

Mr. Jeffrey M. Kosmala, P.E. (MCDOH)
Mr. Michael Bogdan (Sanofi-Aventis)
Mr. Kevin Bruno (RFBC Law)
Mr. Mark Byrne, P.E. (Town of Henrietta)
Ms. Libby Ford, (Nixon Peabody)
Mr. Greg Light (UCB)
Mr. George Hollerbach, P.E. (Quantum)

Ms. Melissa Menetti (NYSDOH)
Mr. David Panipinto (UCB)
Mr. Bart Putzig, P.E. (NYSDEC)
Mr. Sean Keenan (MCDES)
Mr. John Lang, P.E. (Quantum)

TABLE 1 - TREATED WASTE WATER FLOW/VAPOR MONITORING DATA
MCA REMEDIATION SYSTEM
755 JEFFERSON ROAD, HENRIETTA, NEW YORK
NYSDEC VCP NUMBER V00126-8
December 2009

Date	Time¹	Cumulative Hours²	Total Flow³ Gallons	Flow Rate⁴ Gal/Min	Cumulative Gallons^{5,6}	Influent PID (ppm)	Effluent PID (ppm)
11/23/2009	11:17	39413.2	147	1.2	311,593	0.5	0.0
12/9/2009	9:48	39413.6	29	1.2	311,622	1.1	0.2
12/9/2009	11:53	39415.8	216	1.7	311,838	0.9	0.0
12/11/2009	9:20	39461.2	1,549	0.6	313,387	1.3	0.1
12/11/2009	11:30	39463.3	66	0.5	313,453	1.1	0.0
12/14/2009	9:27	39533.3	1,475	0.4	314,928	1.2	0.4
12/14/2009	11:48	39535.7	120	0.8	315,048	0.8	0.0
12/16/2009	9:14	39581.1	747	0.3	315,795	1.3	0.3
12/16/2009	11:02	39582.9	103	1.0	315,898	1.1	0.1

¹Time of day (in military time) data was collected.

² Cumulative Hours represents the number of run-hours since MCA remediation system start-up on 12 July 2006.

³ Total Flow in Gallons represents the flow that occurred since the time the last measurement was collected, as indicated in the previous row of the table.

⁴ Flow Rate in Gallons/Minute represents the average flow rate since the time the last measurement was collected, as indicated in the previous row of the table.

⁵ Cumulative Gallons represents the number of gallons of water treated by the MCA remediation system since start-up on 12 July 2006.

⁶ Totalizer Flow readings collected from newly installed totalizer beginning October 2, 2007.

TABLE 2 - RECOVERY WELL ROTATION DATA
MCA REMEDIATION SYSTEM
755 JEFFERSON ROAD, HENRIETTA, NEW YORK
NYSDEC VCP NUMBER V00126-8
December 2009

Date	Well Rotation Clusters								
	EXSB-2	MW-D8	MW -21	MW-22	MW-20A	MW-20B	RW-6	RW-5	RW-4
December 1-8	System shut down as part of NYSDEC approved pulsing program								
December 9-16		X						X	X
December 17-31	System shut down as part of NYSDEC approved pulsing program								

Figure 1
MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
December 2009

Total VOC Mass Removed (Vapor and Ground Water Combined)

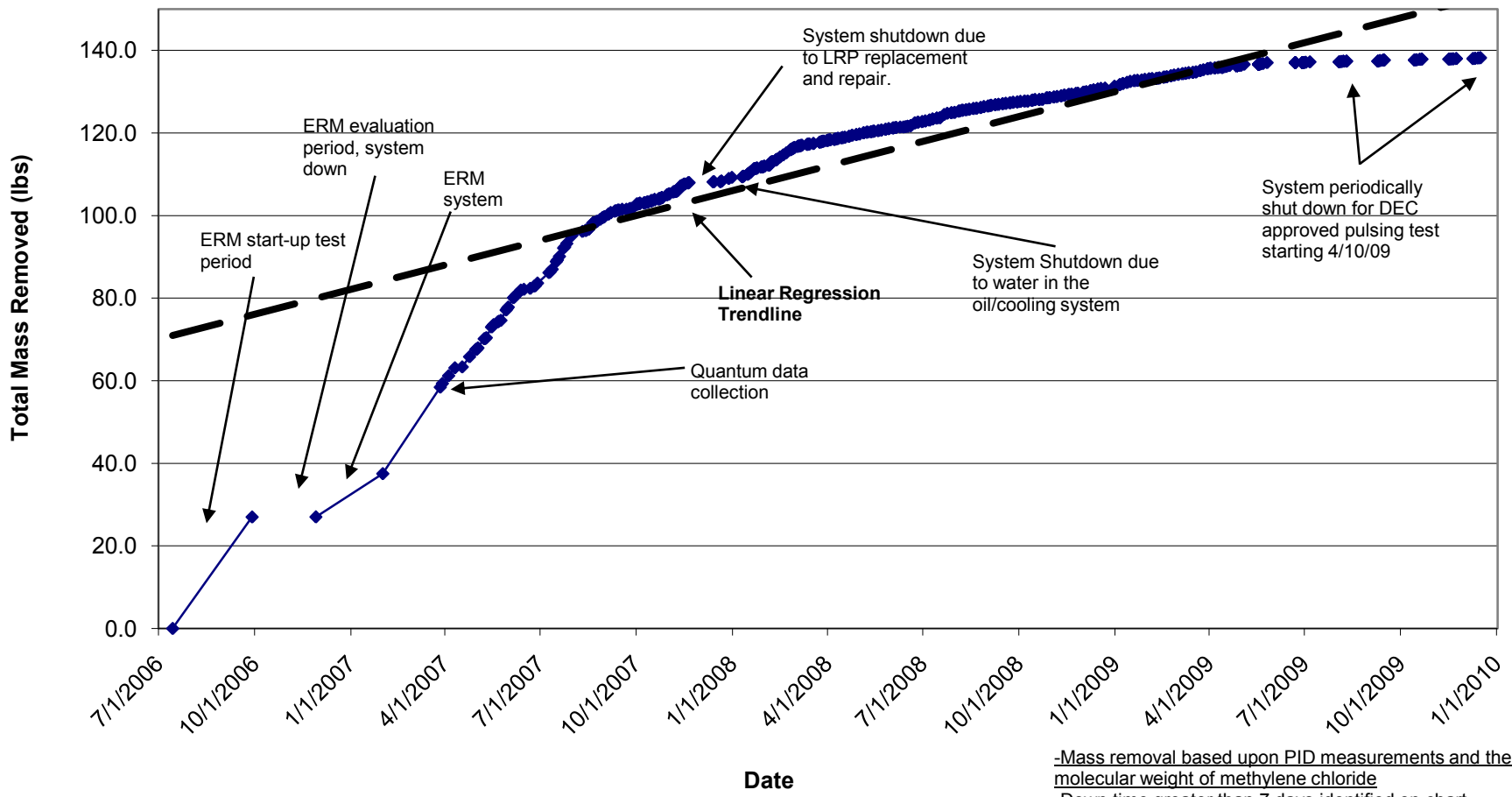


Figure 2

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
December 2009

Total VOC Mass Removal Rate (Vapor & Ground Water Combined)

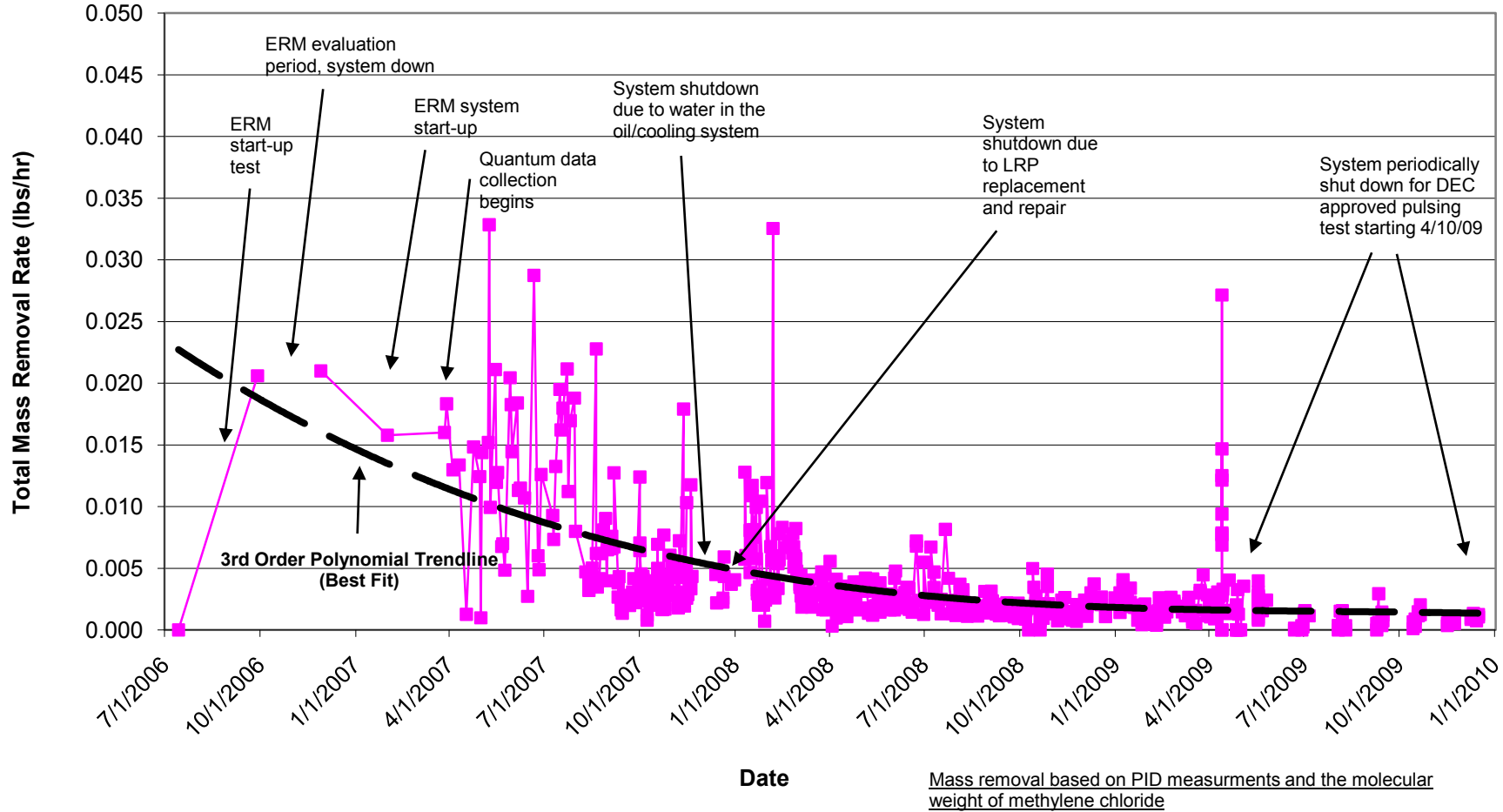


Figure 2A

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
December 2009

Total VOC Mass Removal Rate (Vapor & Ground Water Combined) Since December 2008

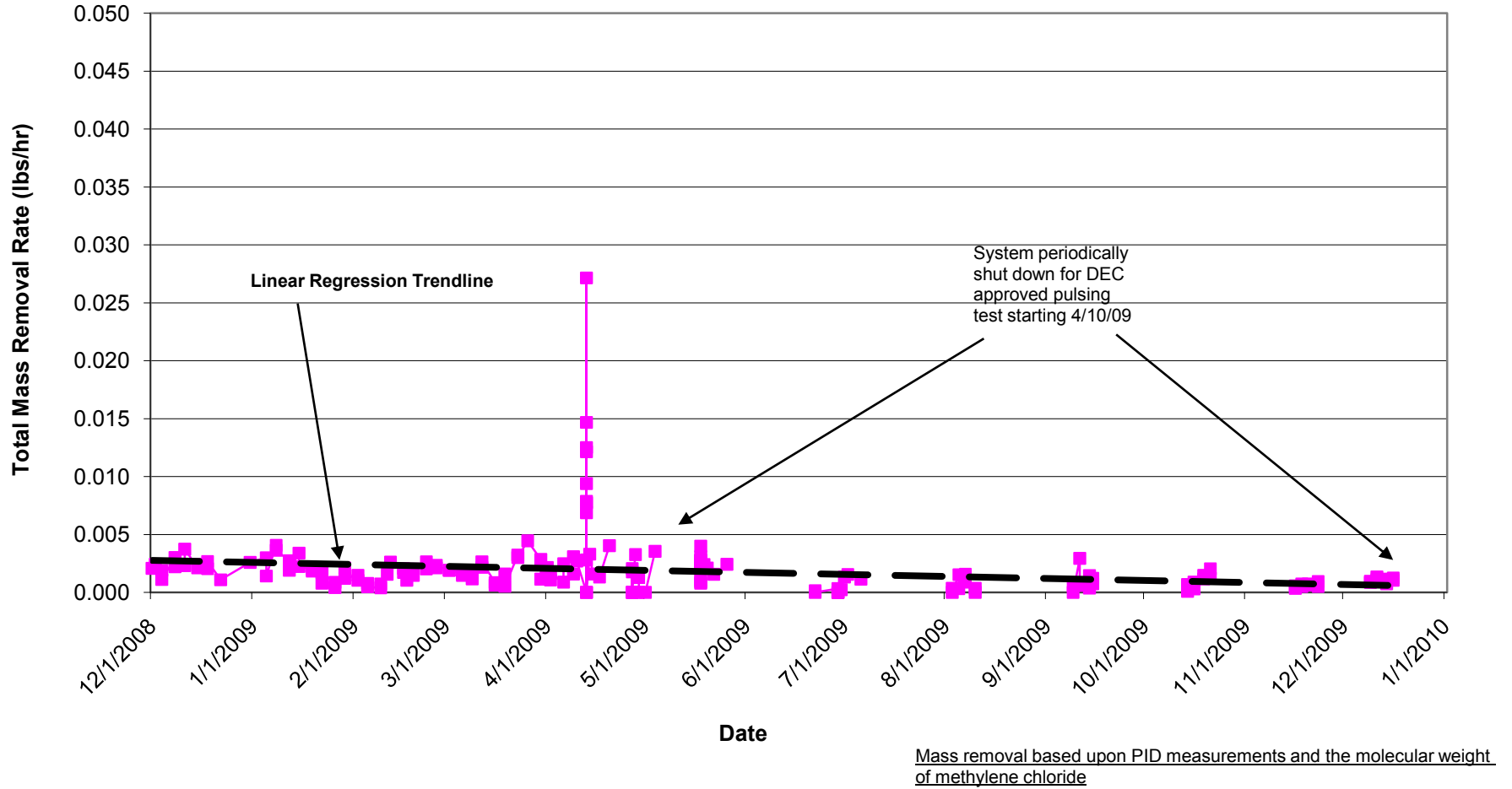


Figure 3

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
December 2009

Vapor Mass Removal Rate

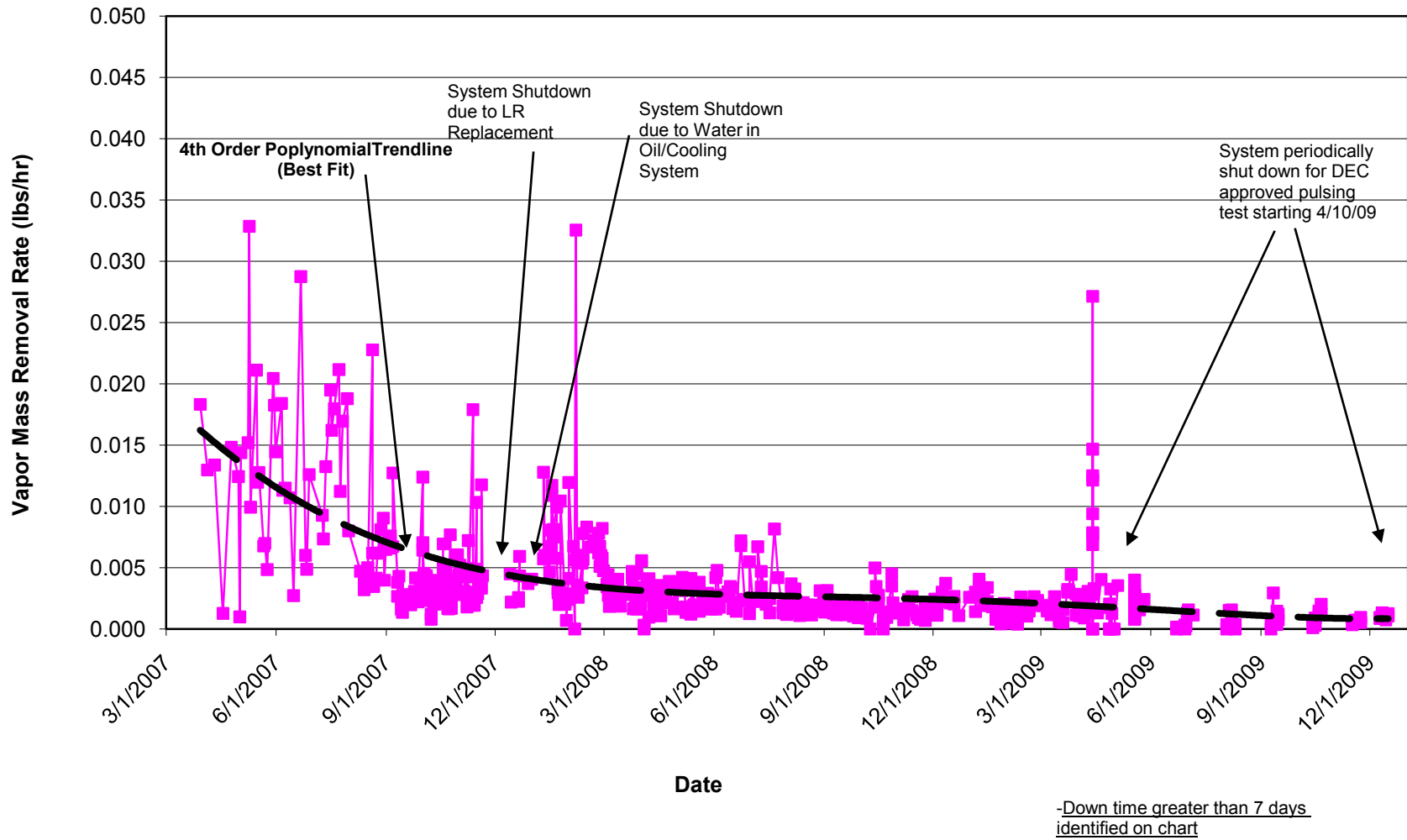


Figure 3A
MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
December 2009
**Vapor Mass Removal Rate
Since December 2008**

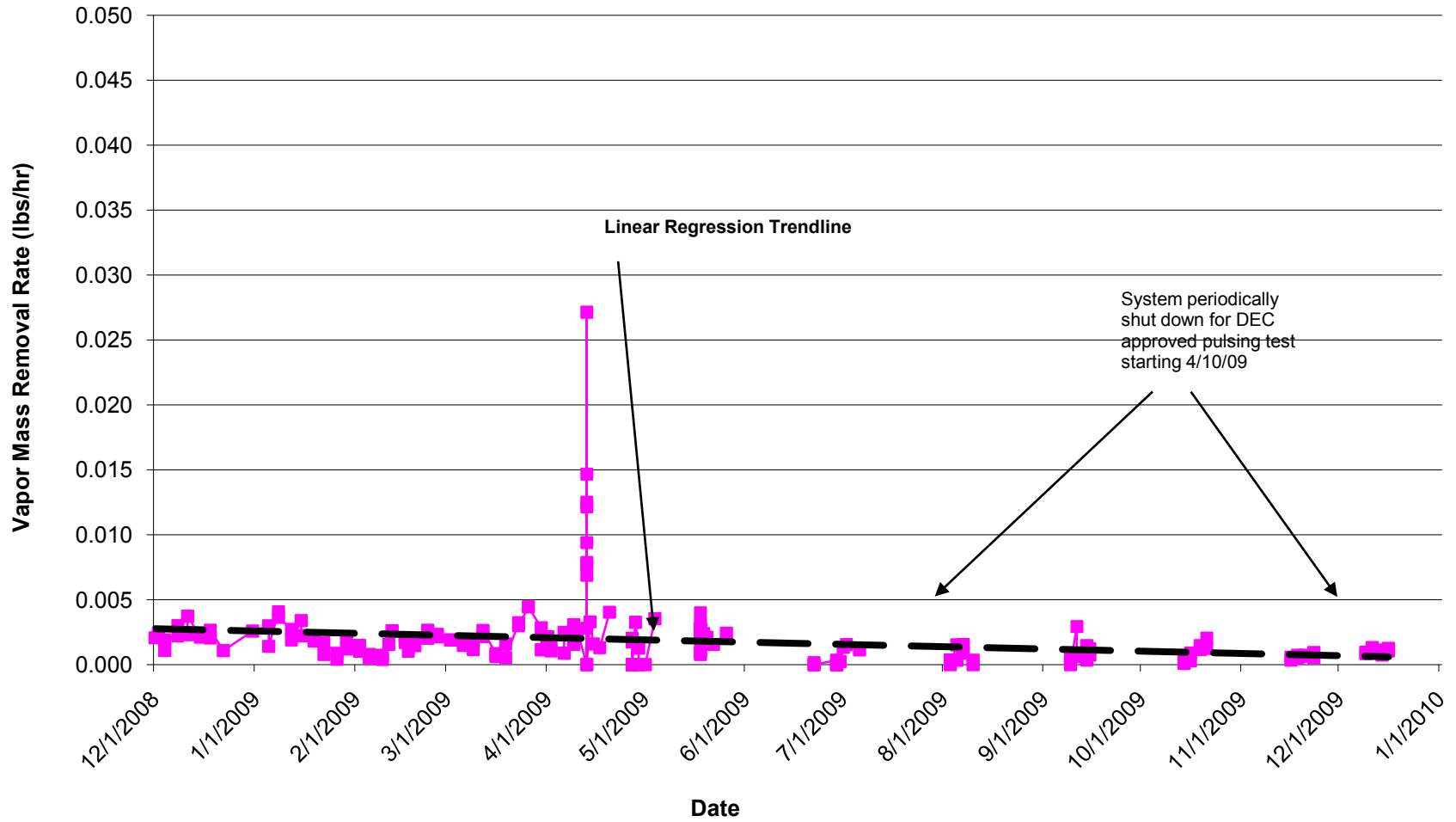
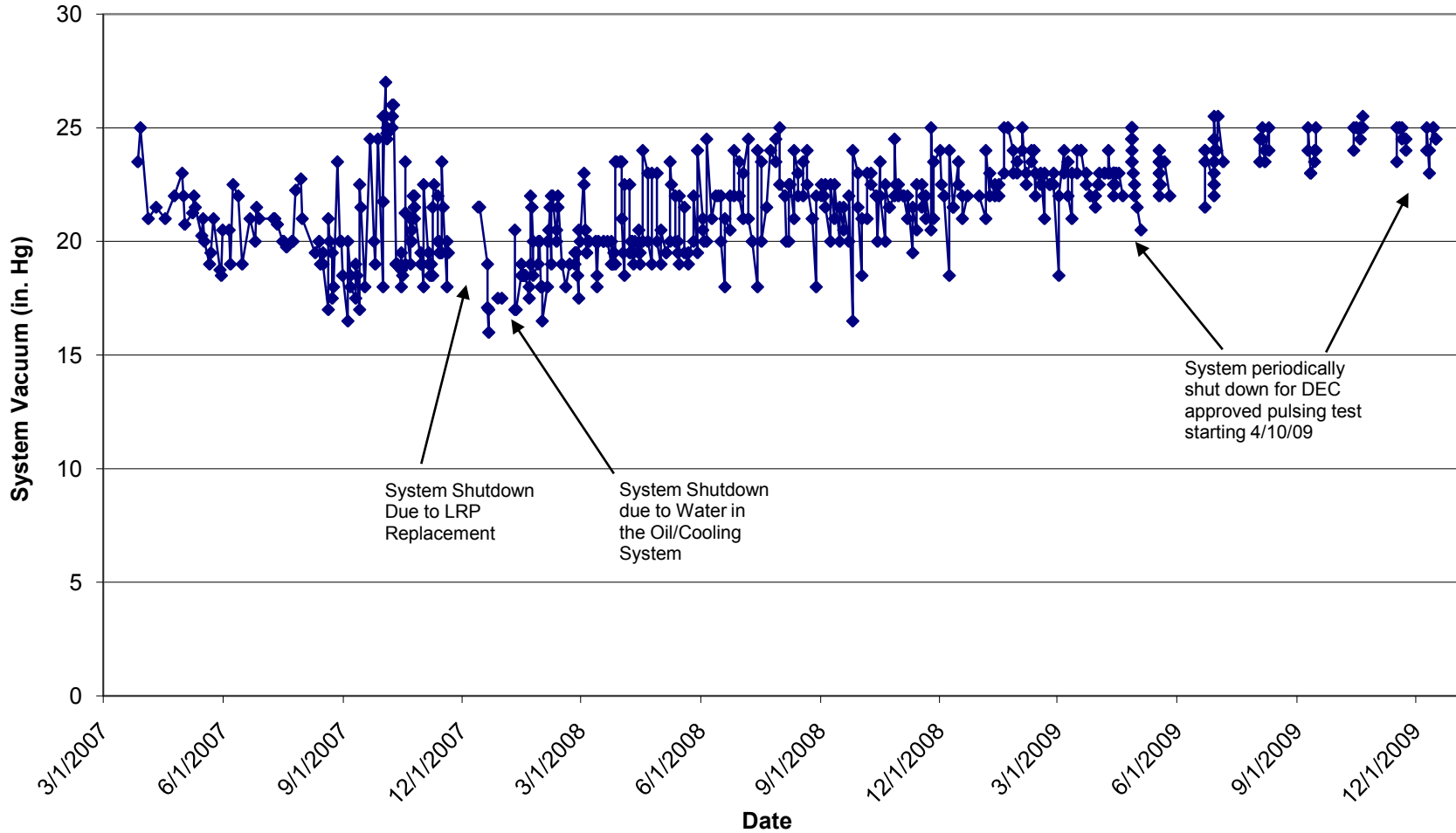


Figure 4

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
December 2009

System Vacuum



-Down time greater than 7 days identified on chart

Figure 5
MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
December 2009
System Vapor Flow Rate

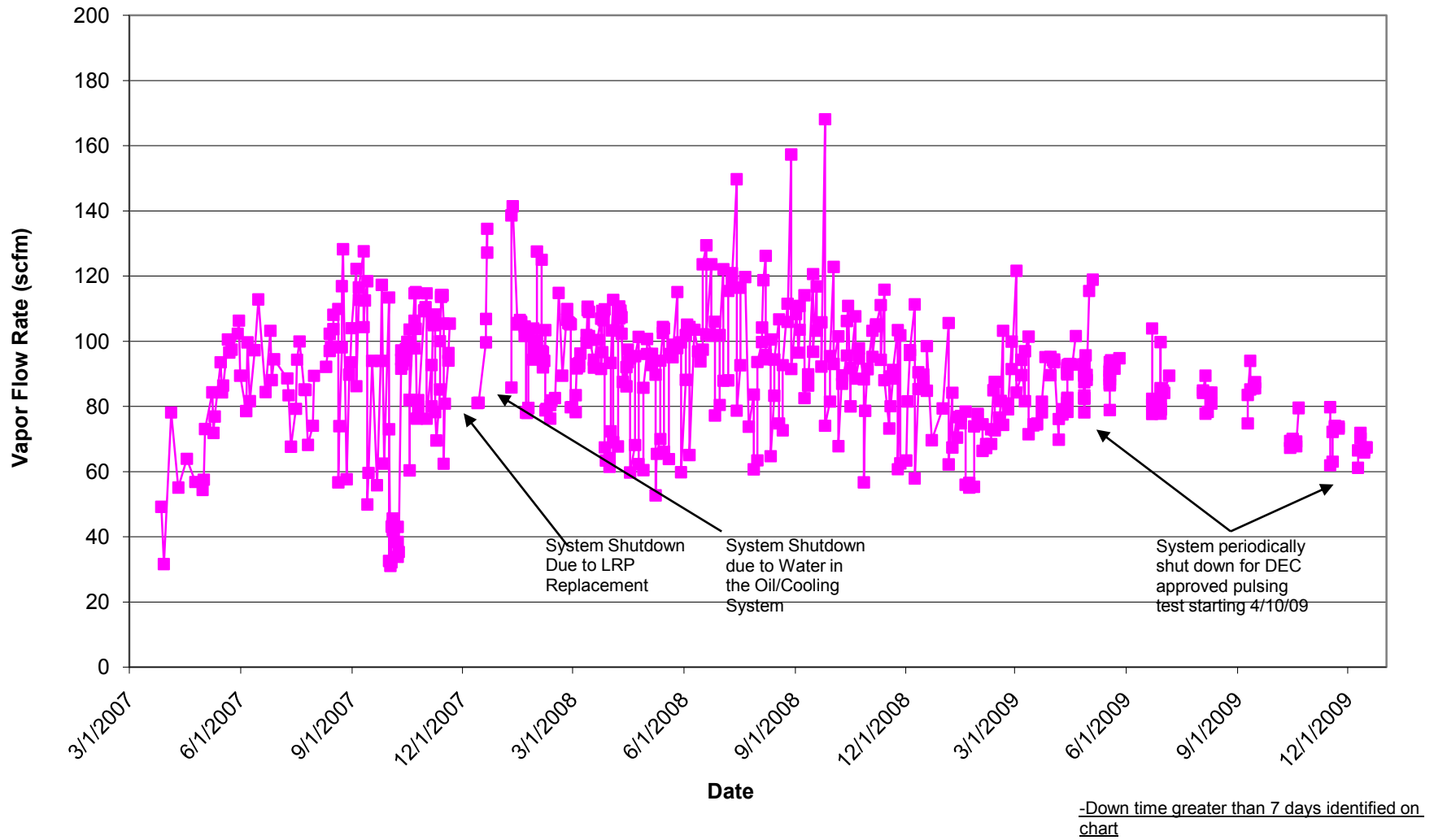


Figure 6

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
December 2009

Total MeCl Mass Removed (Ground Water)

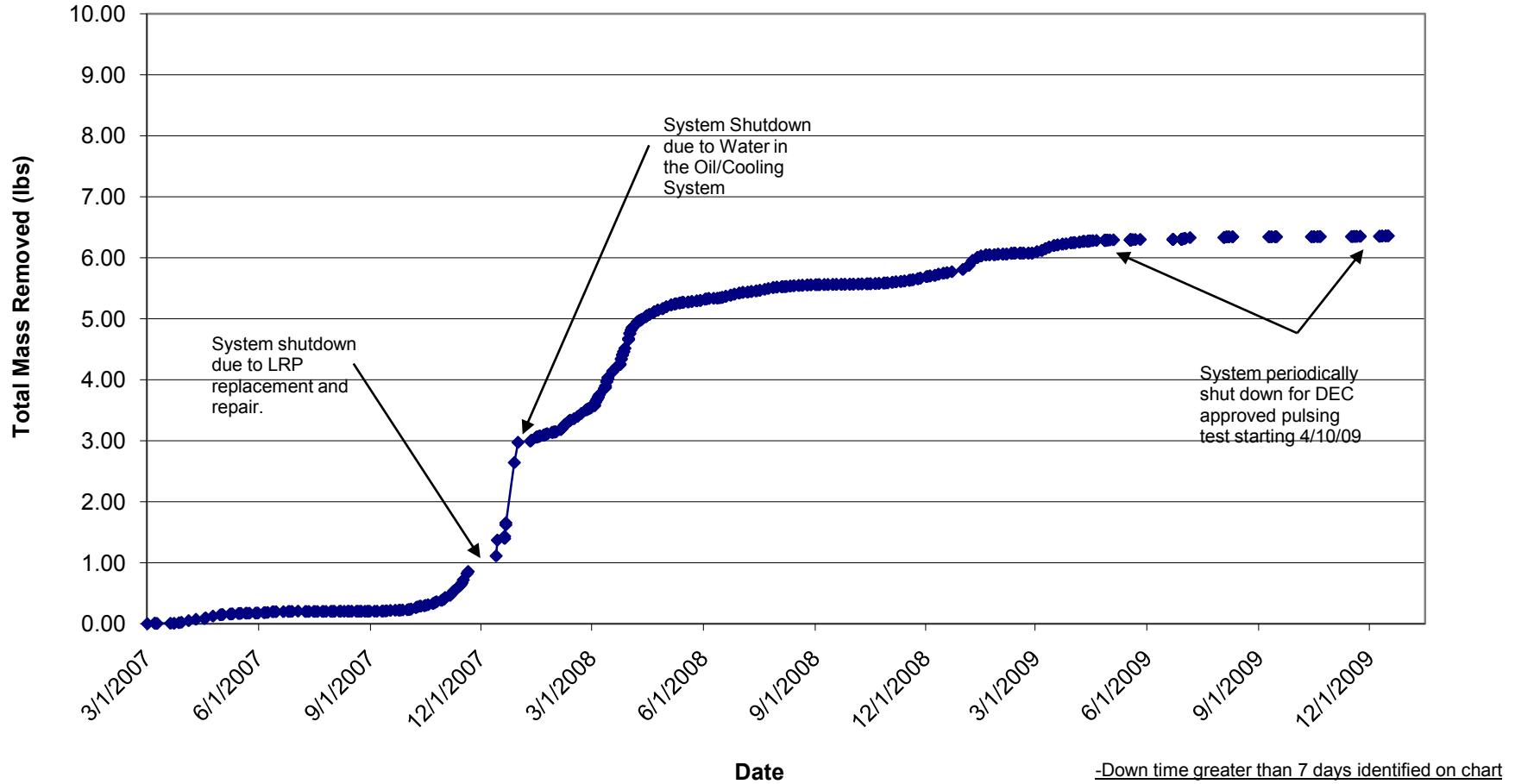
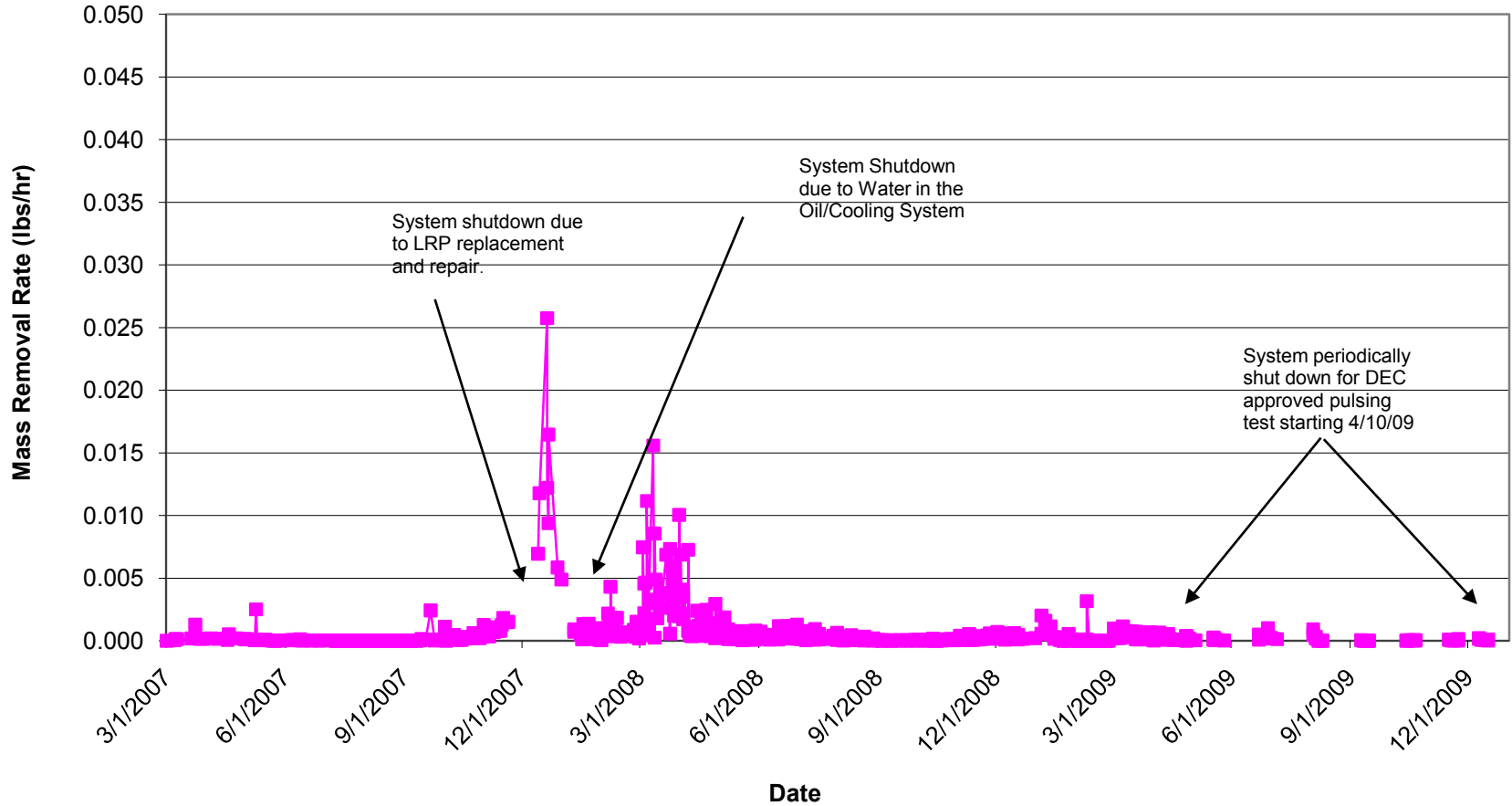


Figure 7

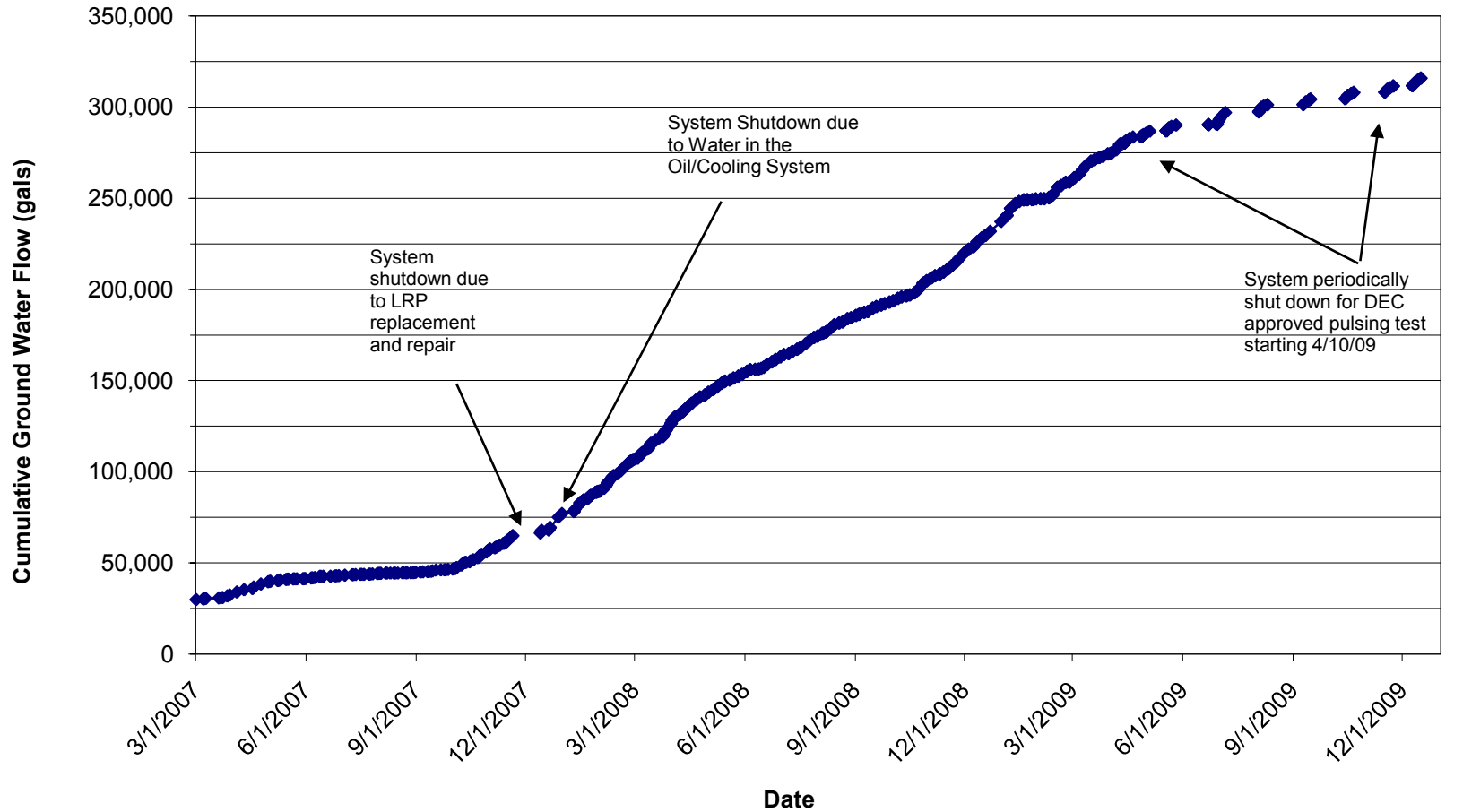
MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
December 2009

MeCl Mass Removal Rate (Ground Water)



-Down time greater than 7 days identified on chart

Figure 8
MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
December 2009
Cumulative Ground Water Flow

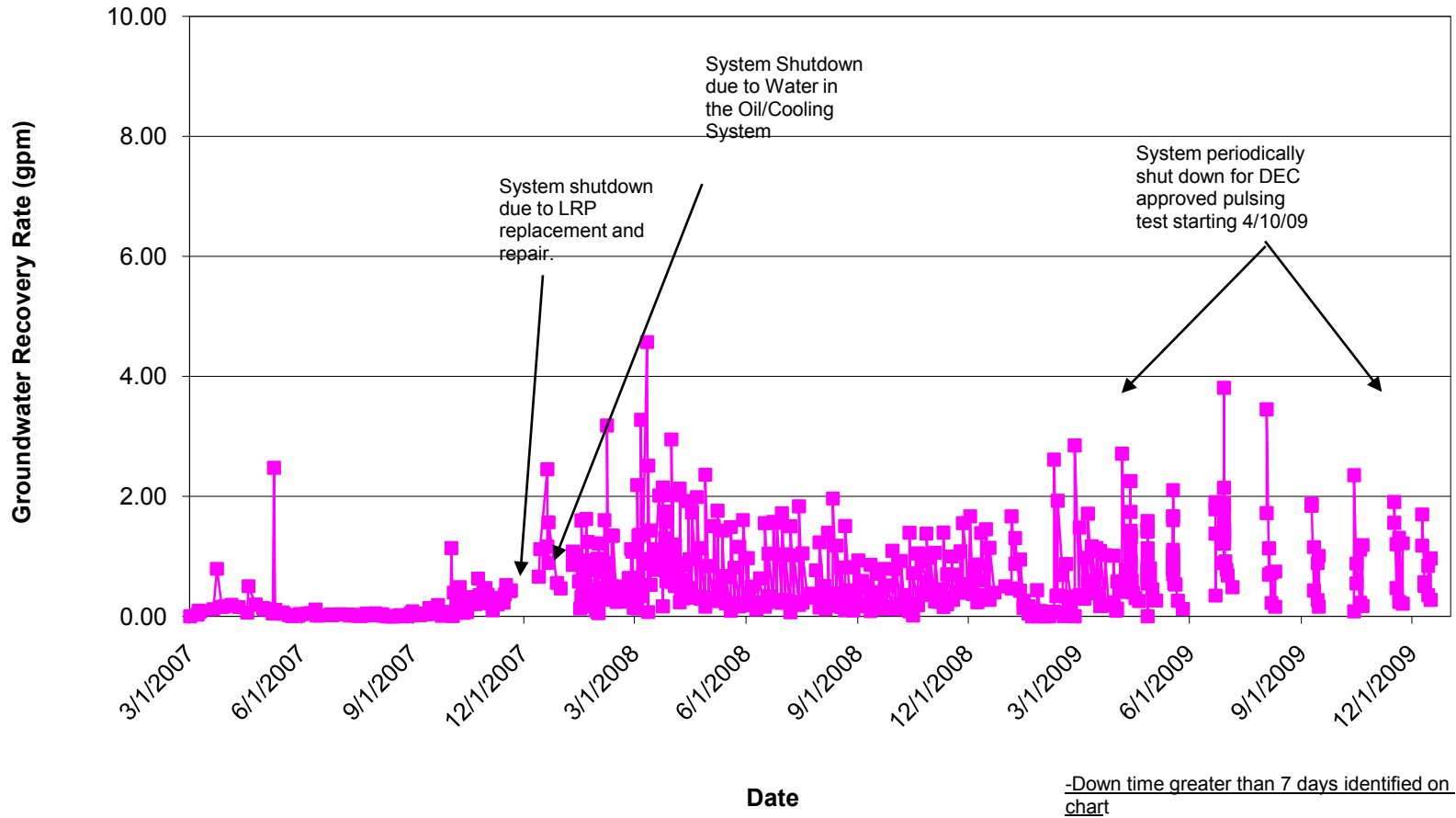


-Down time greater than 7 days identified on chart

Figure 9

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
December 2009

Ground Water Recovery Rate





PARADIGM
ENVIRONMENTAL SERVICES, INC.

Analytical Report Cover Page

Quantum Management Group

For Lab Project # 09-4640
Issued December 21, 2009
This report contains a total of 5 pages

The reported results relate only to the samples as they have been received by the laboratory.

Any noncompliant QC parameters having impact on the data are flagged or documented on the final report.

All soil/sludge samples have been reported on a dry weight basis, unless qualified "reported as received". Other solids are reported as received.

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The Chain of Custody provides additional information, including compliance with sample condition requirements upon receipt. Sample condition requirements are defined under the 2003 NELAC Standard, sections 5.5.8.3.1 and 5.5.8.3.2.

NYSDOH ELAP does not certify for all parameters. Paradigm Environmental Services or the indicated subcontracted laboratory does hold certification for all analytes where certification is offered by ELAP unless otherwise specified.

Data qualifiers are used, when necessary, to provide additional information about the data. This information may be communicated as a flag or as text at the bottom of the report. Please refer to the following list of frequently used data flags and their meaning:

"ND" = analyzed for but not detected.

"E" = Result has been estimated, calibration limit exceeded.

"D" = Duplicate results outside QC limits. May indicate a non-homogenous matrix.

"M" = Matrix spike recoveries outside QC limits. Matrix bias indicated.

"B" = Method blank contained trace levels of analyte. Refer to included method blank report.

Volatile Analysis Report for Water

Client: Quantum Management Group

Client Job Site:	MPRS @ UCB Jefferson Rd.	Lab Project Number:	09-4640
Client Job Number:	N/A	Lab Sample Number:	14043
Field Location:	PreBt/inf 1,2&3 Comp	Date Sampled:	12/14/2009
Field ID Number:	N/A	Date Received:	12/14/2009
Sample Type:	Water	Date Analyzed:	12/17/2009

Liquid Influent

Compounds	Results in ug / L
Acetone	ND< 25.0
Amyl Acetate	ND< 62.5
Benzene	ND< 1.75
2-Butanone	ND< 25.0
Carbon disulfide	ND< 12.5
Chloroform	ND< 5.00
Chloromethane	ND< 5.00
cis-1,2-Dichloroethene	ND< 5.00
Ethyl acetate	ND< 62.5
Isopropyl acetate	ND< 62.5
Methylene chloride	189
m,p-Xylene	ND< 5.00
o-Xylene	ND< 5.00

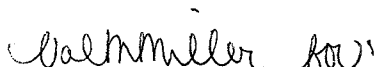
ELAP Number 10958

Method: EPA 624

Data File: V71190.D

Comments: ND denotes Non Detect
ug / L = microgram per Liter

Signature:


Bruce Hoogesteger: Technical Director

Volatile Analysis Report for Water

Client: **Quantum Management Group**

Client Job Site:	MPRS @ UCB Jefferson Rd.	Lab Project Number:	09-4640
Client Job Number:	N/A	Lab Sample Number:	14044
Field Location:	SP-302/eff 1,2&3 Comp	Date Sampled:	12/14/2009
Field ID Number:	N/A	Date Received:	12/14/2009
Sample Type:	Water	Date Analyzed:	12/17/2009

Liquid Effluent

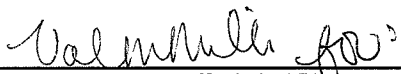
Compounds	Results in ug / L
Acetone	ND< 10.0
Amyl Acetate	ND< 25.0
Benzene	ND< 0.700
2-Butanone	ND< 10.0
Carbon disulfide	ND< 5.00
Chloroform	ND< 2.00
Chloromethane	ND< 2.00
cis-1,2-Dichloroethene	ND< 2.00
Ethyl acetate	ND< 25.0
Isopropyl acetate	ND< 25.0
Methylene chloride	ND< 5.00
m,p-Xylene	ND< 2.00
o-Xylene	ND< 2.00

ELAP Number 10958

Method: EPA 624

Data File: V71191.D

Comments: ND denotes Non Detect
ug / L = microgram per Liter

Signature: 
Bruce Hoogesteger: Technical Director

Volatile Analysis Report for Air

Client: Quantum Management Group

Client Job Site: MPRS @ UCB Jefferson Rd	Lab Project Number: 09-4640
	Lab Sample Number: 14045
Client Job Number: N/A	
Field Location: SP-102 Tedlar Bag	Date Sampled: 12/14/2009
Field ID Number: N/A	Date Received: 12/14/2009
Sample Type: Air	Date Analyzed: 12/21/2009

Vapor Influent

Compound	Results in PPBv	Results in ug / m3
Acetone	ND< 4,220	ND< 10,000
Benzene	ND< 627	ND< 2,000
2-Butanone	ND< 3,400	ND< 10,000
Carbon disulfide	ND< 643	ND< 2,000
Chloroform	ND< 414	ND< 2,000
Chloromethane	ND< 978	ND< 2,000
cis-1,2-Dichloroethene	ND< 509	ND< 2,000
Methylene chloride	ND< 1,460	ND< 5,000
m,p-Xylene	ND< 461	ND< 2,000
o-Xylene	ND< 461	ND< 2,000

ELAP Number 10958

 Method: EPA 8260B
 Modified for Tedlar Bag

Data File: V71269.D

Comments: ND denotes Non Detect
 PPBv = Parts per Billion volume
 ug / m3 - Microgram per cubic meter.

Signature:



 Bruce Hoogesteger: Technical Director

PARADIGM

ENVIRONMENTAL SERVICES, INC.

179 Lake Avenue
Rochester, NY 14608
(585) 647-2530 • (800) 724-1997

CHAIN OF CUSTODY

REPORT TO:		INVOICE TO:	
COMPANY: Quantum Management Group	ADDRESS: 21 Shelly Lane	COMPANY: Quantum Management Group	ADDRESS: 1187 Main Ave, Main Mall Plaza, Suite 2B
CITY: Spencerport	STATE: NY ZIP: 14559	CITY: Clifton	STATE: NJ ZIP: 07011
PHONE: 729-7387	FAX:	PHONE: 973-340-8808	FAX: 973-340-8818
ATTN: Holley Stewart		ATTN:	
COMMENTS: * Email report to hstewart@qmg-inc.com		REQUESTED ANALYSIS	
LAB PROJECT #	CLIENT PROJECT #	LAB PROJECT #	CLIENT PROJECT #
094640		094640	
TURNAROUND TIME: (WORKING DAYS)		TURNAROUND TIME: (WORKING DAYS)	
1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input checked="" type="checkbox"/> 5 <input type="checkbox"/>		1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input checked="" type="checkbox"/> 5 <input type="checkbox"/>	
Quotation #		Quotation #	
STD <input type="checkbox"/>		OTHER <input type="checkbox"/>	

DATE	TIME	COMPOSITE	GRADES	SAMPLE LOCATION/FIELD ID	MATERIAL	CONTAMINANTS	Site Specific VOC's by 624	REMARKS	PARADIGM LAB SAMPLE NUMBER
12/14/09	9:36	✓	PreB/Int:1		W	Z1			
	10:24	✓	PreB/Int:2		W	Z1	X	* Composite grabs to 1 sample	14043
	11:11	✓	PreB/Int:3		W	Z1			
	9:36	✓	SP-302/eff.1		W	1	X		
	10:24	✓	SP-302/eff.2		W	1			14044
	11:11	✓	SP-302/eff.3		W	1			
	9:34	✓	SP-102 Tedlar bag		V	1		EPA Method 8260B modified for Tedlar bag	14045

LAB USE ONLY BELOW THIS LINE

Sample Condition: Per NELAC/ELAP 210/241/242/243/244

Receipt Parameter: NELAC Compliance

Container Type: Y N

Comments: Preservation: Y N

Comments: Residual: Y N

Holding Time: Y N

Temperature: Y N

Comments: 15°C

Sampled By: Holley Stewart Date/Time: 12-14-09/12:05

Relinquished By: Holley Stewart Date/Time: 12-14-09/12:05

Received By: [Signature] Date/Time: 12/14/09 12:05

Received @ Lab By: Elizabeth A. Homck Date/Time: 12/14/09 1435

Total Cost:

P.L.F.



December 22, 2009

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: Third Quarter 2009 Environmental Effectiveness Monitoring Report
755 Jefferson Road Facility – Henrietta, New York
NYSDEC VCP Number: V00126-8**

Dear Mr. MacLean:

On behalf of UCB Manufacturing Inc. (UCB), please find enclosed the Quarterly Environmental Effectiveness Monitoring Report for the above-referenced Site for the Third Quarter of 2009 for the time period from July 1, 2009 through September 30, 2009. This report is being submitted in accordance with the requirements described in Section 6.2 of the Draft Operation, Maintenance & Monitoring (OM&M) Plan.

Between September 15 and 18, 2009, Kleinfelder East, Inc. completed quarterly liquid gauging and ground water sampling at the Site pursuant to Section 4.3 of the Draft OM&M Plan. Groundwater quality analytical results are summarized on Table 1. The Multi Phase Remedial System (MPRS) continues to operate on a pulsed schedule of one week of operation and four weeks of shut down time.

If you require additional information or clarification, please contact the undersigned at (585) 777-4110 or Rick Bethel of Quantum Management Group, Inc. at (513) 314-7543.

Sincerely,
Kleinfelder East, Inc.

Rose M. Weissman
Senior Project Manager

Alexander Wirth
Senior Project Geologist

Enclosure

Cc: Rick Bethel – Quantum Management Group, Inc.
John Lang – Quantum Management Group, Inc.
Michael Bogdan – Sanofi Aventis
Jean McCreary – Nixon Peabody
Kevin Bruno – Robertson, Freilich, Bruno & Cohen
Libby Ford – Nixon Peabody

**755 Jefferson Road Site, Henrietta, NY
QUARTERLY ENVIRONMENTAL EFFECTIVENESS MONITORING REPORT**

Site Address: Jefferson Road Facility	Regulatory Agency: NYSDEC – Region 8
755 Jefferson Road	Regulatory Contact: Gregory B. MacLean, P.E.
Rochester, New York	Consultant: Quantum Management Inc. (QMG), Kleinfelder East, Inc. (Kleinfelder)
NYSDEC VCP No.: V00126-8	Project Managers / Project Geologist: Rick Bethel (QMG), Rose Weissman (Kleinfelder) / Alexander Wirth (Kleinfelder)
UCB Contact: Greg Light	

Report Date: December 22, 2009.

Current Site Status: Active pharmaceutical manufacturing facility.

Monitoring Period: Third Quarter 2009 (July 1 through September 30).

Work Performed: Quarterly environmental effectiveness monitoring pursuant to Section 4.3 of the Draft OM&M plan submitted to New York State Department of Environmental Conservation in May 2007 and the addendum to the Draft OM&M Plan submitted in August 2007. Gauged 25 monitoring wells on September 15, 2009 and collected groundwater samples from 16 monitoring wells on September 16, 17 and 18, 2009. The Multi Phase Recovery System (MPRS) was on at the time of gauging and sampling.

Groundwater Monitoring:

Number of Wells:	25
Gauging Frequency:	Quarterly
Sampling Frequency:	Quarterly (9 wells 1 st , 2 nd & 4 th quarter / 16 wells 3 rd quarter)
Overburden Groundwater Depth:	2.55 feet to 44.76 feet

The MPRS was operating during water level gauging, vacuum influence monitoring was not conducted this quarter due to equipment failure. All measurements were recorded and samples collected during operating conditions.

Shallow Groundwater Flow: Variable

Intermediate Groundwater Flow:	Southeast
Deep Groundwater Flow:	Variable
Shallow Groundwater Gradient:	0.09 feet per foot
Intermediate Groundwater Gradient:	0.37 feet per foot
Deep Groundwater Gradient:	0.63 feet per foot

Site Geology:

The top of bedrock is located approximately 55-feet below grade throughout the Site. Surficial deposits at the Site generally consist of reddish-brown silt and clay with lesser amounts of brown fine/coarse grained sand and gray rounded gravel. Coarser material (particularly sand) was more abundant at depths of 0 to 6-feet below grade compared to deeper intervals. The relative permeability of the unconsolidated deposits above bedrock at the Site is considered low.

MPRS Effectiveness:

The MPRS continues to recover limited residual methylene chloride from areas of impacted soil and groundwater.

Since March 12, 2009 only three wells (MW-D8, RW-5 and RW-4) have been used as recovery wells as methylene chloride concentrations were highest in these wells based on previous quarterly sampling results. Recovery wells RW-4 (intermediate depth), RW-5 (intermediate depth) and MW-D8 (intermediate depth) continue to exhibit higher methylene chloride concentrations than other wells across the site. RW-4, RW-5 and MW-D8 will continue to be used as recovery wells during the continued pulsing operation throughout the fourth quarter of 2009 or until closure of the site is approved by NYSDEC.

The dissolved phase concentration has been reduced across the Site as depicted on Figures 7 through 20. The total VOC vapor mass recovery rate has been steadily decreasing since system start up. During the investigation Phase, the spill quantity was estimated to be 171 pounds. As of September 30, 2009, the system has recovered an estimated total of 137.6 pounds of methylene chloride since startup. For the period from July 1, 2009 to September 30, 2009, the

system recovered an estimated total of 0.6 pounds of methylene chloride. The system operated for a total of 440 hours during this quarter. The average calculated recovery rate of methylene chloride over this quarter is 0.0014 pounds per hour. Overall mass recovery will continue to be monitored as a part of the effort to evaluate remedial effectiveness.

The VOC recovery rate of the MPRS has significantly diminished to an apparent asymptotic level.

Comments:

The wells were sampled in accordance with the ground water sampling procedures outlined in Section 4.3 of the Draft Operations, Maintenance, and Monitoring (OM&M) Plan and the addendum to the Draft OM&M Plan submitted in August 2007. Wells were sampled in order of the lowest historical methylene chloride concentration to the highest historical methylene chloride concentration. The pumps were decontaminated between wells in accordance with the addendum to Section 1.5 of the Site Specific Health and Safety Plan presented as Attachment A to the OM&M Plan contained within the Draft Final Engineering Report.

RW-5 was sampled at the 35 foot below ground surface (BGS) interval only during the third quarter sampling event due to a field error. Both the 23' and 35' intervals in well RW-5 will be sampled and evaluated as part of the 4th quarter 2009 monitoring event.

Methylene chloride concentrations in groundwater collected from other site-related monitoring wells are within historical levels. Recovery well RW-4 had a concentration of 3,300 µg/L this quarter as compared to 78 µg/L last quarter. Recovery well MW-D8 had a concentration of 21,000 µg/L this quarter as compared to 29,000 µg/L last quarter. Recovery well RW-5 (35') had a concentration of 630 µg/L this quarter as compared to 2.2 µg/L last quarter.

Methylene chloride concentrations in groundwater showed slight variations in eight other wells. Five wells (MW-18, MW-D7, MW-D12, MW-D13 & RW-2) showed a decrease in concentration to below

detection limits from concentrations last quarter that ranged from 0.85 to 5.7 µg/L. Three wells (MW-16, MW-D6 & MW-D10) showed a slight increase in concentration from below detection limits to concentrations ranging from 0.99 to 4.0 µg/L. These slight variations of concentrations ranging from below detection limits to around 5 µg/L seem to be noise in the data rather than an indication of dynamic conditions of the distribution of the residual Methylene chloride concentrations remaining in the soil and groundwater.

Based on available data and consistently low recovery rates, asymptotic conditions have been reached. The existing remediation system is no longer exhibiting effective recovery of methylene chloride. Kleinfelder, on behalf of UCB/Sanofi Aventis, is currently drafting a site closure plan to summarize data and propose a path towards closure.

The NYSDEC-approved pulsing program continues by the ongoing cycle of one week of operation followed by four weeks of shut down of the MPRS. The initial testing of the pulsing program was conducted from April 13 to July 6, 2009; a summary report was submitted on August 11, 2009. The system will continue to be pulsed on a repeated cycle defined as operating for one week followed by not operating for four weeks until closure is granted by NYSDEC.

Limitations:

This work was performed in a manner consistent with that level of care and skill ordinarily exercised by other members of Kleinfelder's profession practicing in the same locality, under similar conditions and at the date the services are provided. Our conclusions, opinions and recommendations are based on a limited number of observations and data. It is possible that conditions could vary between or beyond the data evaluated. Kleinfelder makes no other representation, guarantee or warranty, express or implied, regarding the services, communication (oral or written), report, opinion, or instrument of service provided.

This report may be used only by the Client and the registered design professional in responsible charge and only for the purposes stated for this specific engagement within

a reasonable time from its issuance, but in no event later than two (2) years from the date of the report.

Kleinfelder offers various levels of investigative and engineering services to suit the varying needs of different clients. It should be recognized that definition and evaluation of geologic and environmental conditions are a difficult and inexact science. Judgments leading to conclusions and recommendations are generally made with incomplete knowledge of the subsurface conditions present due to the limitations of data from field studies. Although risk can never be eliminated, more-detailed and extensive studies yield more information, which may help understand and manage the level of risk.

Attachments:	Table:	Table 1 – Monitoring Well Gauging and Groundwater Analytical Data
	Figures:	Figure 1 – Area Map Figure 2 – Site Plan Figure 3 – Groundwater Contour and Concentration Map – Shallow Wells Figure 4 – Groundwater Contour and Concentration Map – Intermediate Wells Figure 5 – Groundwater Contour and Concentration Map – Deep Wells Figure 6 – Diagonal Well Potentiometric Conversion Figures 7-20 – Dissolved Phase Concentration Trend Graphs
	Appendices:	Appendix A – Monthly Progress Reports – July, August and September 2009

TABLE

Table 1
MONITORING WELL GAUGING AND GROUNDWATER ANALYTICAL DATA

UCB Facility
755 Jefferson Road
Rochester, New York
June 18, 2007 through
June 19, 2009

Sample ID	Date	TOC Elevation	Depth to Water	Corrected Water Table Elevation	Acetone	Methyl Ethyl Ketone	Dichloro-difluoromethane	cis-1,2-Dichloroethene	Ethyl acetate	Isopropyl acetate	n-Amyl Acetate	Total Xylenes	Benzene	Chloroform	Chloromethane	1,1-Dichloroethene	trans-1,2-Dichloroethene	Carbon Disulfide	Methylene chloride	
NYSDEC Standards					50	50	5	5	-	-	-	5	1	7	5	5	5	50	5	
MW-11 (Gauge only)	10/14/1996	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL	
	11/15/1996	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL	
	2/1/1999	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL	
	4/29/1999	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL	
	7/30/1999	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL	
	10/18/1999	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL	
	1/28/2000	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL	
	8/21/2003	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL	
	6/18/2007	545.81	7.88	537.93	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	9/19/2007	545.81	6.95	538.86	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	12/17/2007	545.81	4.57	541.24	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	3/14/2008	545.81	6.27	539.54	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	6/3/2008	545.81	6.38	539.43	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	9/9/2008	545.81	6.49	539.32	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	12/17/2008	545.81	5.35	540.46	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
3/23/2009	545.81	6.07	539.74	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	
6/17/2009	545.81	3.54	542.27	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	
9/15/2009	545.81	6.20	539.61	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	
MW-12 (Gauge & sample)	10/14/1996	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	2,800	
	11/15/1996	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	1.3	BRL	NA	BRL	NA	710	
	4/10/2002	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL	
	8/22/2003	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL	
	9/13/2005	NG	NG	NG	2 J	NA	NA	NA	NA	NA	NA	BRL	BRL	NA	NA	NA	NA	NA	BRL	
	2/21/2007	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	
	6/19/2007	544.50	3.37	541.13	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<15	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	
	9/19/2007	544.50	4.16	540.34	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<15	<5.0	<5.0	<5.0	NA	NA	NA	<5.0	
	12/19/2007	544.50	1.50	543.00	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<15	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	
	3/17/2008	544.50	1.61	542.89	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<15	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	
	6/3/2008	544.50	3.30	541.20	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<15	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	
	9/9/2008	544.50	3.68	540.82	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<15	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	
	12/17/2008	544.50	1.91	542.59	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	
	3/23/2009	544.50	2.48	542.02	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	
	6/17/2009	544.50	1.39	543.11	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	
9/16/2009	544.50	2.55	541.95	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0		
MW-14 (Gauge only)	5/12/1998	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL	
	2/1/1999	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL	
	4/29/1999	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL	
	7/30/1999	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL	
	10/18/1999	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL	
	1/28/2000	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL	
	8/20/2003	NG	NG	NG	BRL	9.4	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL
	6/18/2007	544.42	2.76	541.66	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	
	9/19/2007	544.42	3.32	541.10	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	
	12/17/2007	544.42	1.83	542.59	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	
	3/14/2008	544.42	4.38	540.04	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	
	6/3/2008	544.42	3.75	540.67	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	
	9/9/2008	544.42	2.39	542.03	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	
	12/17/2008	544.42	2.35	542.07	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	
	3/23/2009	544.42	2.14	542.28	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	
6/17/2009	544.42	1.77	542.65	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS		
9/15/2009	544.42	2.36	542.06	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	

Table 1
MONITORING WELL GAUGING AND GROUNDWATER ANALYTICAL DATA

UCB Facility
755 Jefferson Road
Rochester, New York
June 18, 2007 through
June 19, 2009

Sample ID	Date	TOC Elevation	Depth to Water	Corrected Water Table Elevation	Acetone	Methyl Ethyl Ketone	Dichloro-difluoromethane	cis-1,2-Dichloroethene	Ethyl acetate	Isopropyl acetate	n-Amyl Acetate	Total Xylenes	Benzene	Chloroform	Chloromethane	1,1-Dichloroethene	trans-1,2-Dichloroethene	Carbon Disulfide	Methylene chloride
NYSDEC Standards					50	50	5	5	-	-	-	5	1	7	5	5	5	50	5
MW-16 (Gauge & sample)	3/6/2002	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	2.2 J
	8/27/2003	NG	NG	NG	BRL	BRL	BRL	NA	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL
	9/15/2005	NG	NG	NG	BRL	NA	NA	NA	NA	NA	NA	NA	BRL	NA	NA	NA	NA	NA	0.6 J
	2/23/2007	NG	NG	NG	BRL	BRL	NA	BRL	BRL	BRL	NA	BRL	BRL	BRL	BRL	NA	NA	NA	BRL
	6/19/2007	548.41	6.83	541.58	<25	<25	<5.0	<5.0	<5.0	<5.0	NA	<15	<5.0	<5.0	<5.0	<5.0	<5.0	NA	<5.0
	9/20/2007	548.41	7.54	540.87	<25	<25	NA	<5.0	<5.0	<5.0	NA	<15	<5.0	<5.0	<5.0	NA	NA	NA	<5.0
	12/19/2007	548.41	5.75	542.66	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<15	<5.0	<5.0	<5.0	<5.0	<5.0	NA	<5.0
	3/17/2008	548.41	6.01	542.40	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<15	<5.0	<5.0	<5.0	<5.0	<5.0	NA	<5.0
	6/3/2008	548.41	7.00	541.41	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<15	<5.0	<5.0	<5.0	<5.0	<5.0	NA	<5.0
	9/9/2008	548.41	7.26	541.15	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<15	<5.0	<5.0	<5.0	<5.0	<5.0	NA	<5.0
	12/17/2008	548.41	6.69	541.72	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	3/23/2009	548.41	6.64	541.77	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	6/17/2009	548.41	5.09	543.32	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	9/16/2009	548.41	6.64	541.77	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	0.99 J
MW-18 (Gauge & sample)	3/6/2002	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	9,100,000
	8/28/2003	NG	NG	NG	BRL	BRL	BRL	1.8	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	1.2
	9/14/2005	NG	NG	NG	BRL	NA	NA	NA	NA	NA	NA	BRL	NA	NA	NA	NA	NA	NA	0.5 J
	2/23/2007	NG	NG	NG	BRL	BRL	NA	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL
	6/18/2007	547.98	DRY	DRY	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NA	NS
	9/19/2007	547.98	DRY	DRY	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NA	NS
	12/19/2007	547.98	9.70	538.28	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<15	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
	3/14/2008	547.98	14.30	533.68	DRY	DRY	DRY	DRY	DRY	DRY	DRY	DRY	DRY	DRY	DRY	DRY	DRY	DRY	DRY
	6/3/2008	547.98	DRY	DRY	DRY	DRY	DRY	DRY	DRY	DRY	DRY	DRY	DRY	DRY	DRY	DRY	DRY	DRY	DRY
	9/9/2008	547.98	DRY	DRY	DRY	DRY	DRY	DRY	DRY	DRY	DRY	DRY	DRY	DRY	DRY	DRY	DRY	DRY	DRY
	12/17/2008	547.98	DRY	DRY	DRY	DRY	DRY	DRY	DRY	DRY	DRY	DRY	DRY	DRY	DRY	DRY	DRY	DRY	DRY
	3/23/2009	547.98	12.53	535.45	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.1	<5.0	<5.0	<5.0	<5.0	5.5 B
	6/17/2009	547.98	6.10	541.88	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.1	<5.0	<5.0	<5.0	<5.0	5.7 B
	9/16/2009	547.98	9.15	538.83	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
MW-19	8/21/2003	NG	NG	NG	2.3 J	1.6 J	BRL	3.1	NA	NA	NA	BRL	0.69 J	BRL	BRL	NA	0.85 J	NA	BRL
	9/14/2005	NG	NG	NG	BRL	NA	NA	NA	NA	NA	NA	NA	BRL	NA	NA	NA	NA	NA	BRL
MW-20A	8/13/2003	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	1,200,000
	9/20/2005	NG	NG	NG	38	NA	NA	NA	NA	NA	NA	NA	1 J	NA	NA	NA	NA	NA	150,000 D
MW-20B	8/13/2003	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	100,000
MW-21	8/12/2003	NG	NG	NG	BRL	BRL	BRL	NA	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	12
	9/8/2005	NG	NG	NG	BRL	NA	NA	NA	NA	NA	NA	NA	BRL	NA	NA	NA	NA	NA	BRL
MW-22	8/12/2003	NG	NG	NG	74	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	37
	9/15/2005	NG	NG	NG	BRL	NA	NA	NA	NA	NA	NA	NA	BRL	NA	NA	NA	NA	NA	BRL
MW-22E	9/4/2003	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	24
	8/14/2003	NG	NG	NG	BRL	BRL	BRL	1.9	NA	NA	NA	BRL	BRL	BRL	BRL	NA	1.3	NA	11
EXSB-1	9/23/2005	NG	NG	NG	15 BJ	NA	NA	NA	NA	NA	NA	NA	BRL	NA	NA	NA	NA	NA	590 D
EXSB-1E	9/6/2003	NG	NG	NG	BRL	BRL	BRL	1.9	NA	NA	NA	BRL	BRL	BRL	BRL	NA	1.4	NA	4.6
	8/13/2003	NG	NG	NG	BRL	BRL	BRL	NA	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	1,900
EXSB-2	9/14/2005	NG	NG	NG	BRL	NA	NA	NA	NA	NA	NA	NA	0.4 J	NA	NA	NA	NA	NA	BRL
	9/5/2003	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	6,600
EXSB-2E	5/12/1998	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL
	2/1/1999	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL
	4/29/1999	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL
	7/30/1999	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL
	11/0/1999	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL
	1/28/2000	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL
	8/18/2003	NG	NG	NG	BRL	14	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	BRL
	6/18/2007	544.32	22.55	521.77	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NA	NS
	9/19/2007	544.32	25.08	519.24	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NA	NS
	12/17/2007	544.32	23.40	520.92	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NA	NS
	3/14/2008	544.32	21.91	522.41	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NA	NS
	6/3/2008	544.32	22.64	521.68	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NA	NS
	9/9/2008	544.32	24.20	520.12	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NA	NS
	12/17/2008	544.32	23.60	520.72	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NA	NS
	3/23/2009	544.32	21.90	522.42	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NA	NS
	6/17/2009	544.32	22.88	521.44	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NA	NS
	9/15/2009	544.32	23.48	520.84	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NA	NS

Table 1
MONITORING WELL GAUGING AND GROUNDWATER ANALYTICAL DATA

UCB Facility
755 Jefferson Road
Rochester, New York
June 18, 2007 through
June 19, 2009

Sample ID	Date	TOC Elevation	Depth to Water	Corrected Water Table Elevation	Acetone	Methyl Ethyl Ketone	Dichloro-difluoromethane	cis-1,2-Dichloroethene	Ethyl acetate	Isopropyl acetate	n-Amyl Acetate	Total Xylenes	Benzene	Chloroform	Chloromethane	1,1-Dichloroethylene	trans-1,2-Dichloroethene	Carbon Disulfide	Methylene chloride
NYSDEC Standards				50	50	5	5	-	-	-	-	5	1	7	5	5	5	50	5
RW-5 (Recovery well, gauge & sample)	8/26/2003	NG	NG	NG	8.1	2.4 J	BRL	0.88 J	NA	NA	NA	BRL	BRL	BRL	0.54 J	NA	BRL	NA	120
	9/12/2005	NG	NG	NG	BRL	NA	NA	NA	NA	NA	NA	BRL	NA	NA	NA	NA	NA	NA	BRL
	2/23/2007	NG	NG	NG	BRL	NA	NA	NA	BRL	BRL	NA	BRL	BRL	BRL	BRL	NA	NA	NA	BRL
	6/20/2007	547.27	22.66	524.61	<25	<25	<5.0	<5.0	<5.0	NA	NA	<15	<5.0	<5.0	5.3	<5.0	<5.0	NA	45,000 D
	9/20/2007	547.27	28.97	518.30	<250	<250	NA	<50	<50	NA	NA	<150	<50	<50	<50	NA	NA	NA	1,000
	12/18/2007	547.27	3.05	544.22	<250	<250	<50	<50	<50	<50	<50	<150	<50	<50	<50	<50	<50	<50	770
	3/17/2008	547.27	14.13	537.28	320	<250	<50	<50	<50	<50	<50	<150	<50	<50	<50	<50	<50	<50	530
	6/4/2008	547.27	46.08	514.69	<250	<250	<50	<50	<50	<50	<50	<150	<50	<50	<50	<50	<50	<50	410
	9/10/2008	547.27	41.68	517.80	<12,000	<12,000	<2,500	<2,500	<2,500	<2,500	<2,500	<1,500	<2,500	<2,500	<2,500	<2,500	<2,500	<2,500	25,000
	12/17/2008	547.27	9.99	540.21	<2,500	<2,500	<500	<500	<500	<500	<500	<1,500	<500	<500	<500	<500	<500	<500	6,600
35	3/23/2009	547.27	45.36	515.20	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	22 B
	6/17/2009	547.27	42.89	516.94	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<1.1	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	2.2 J,B
	9/17/2009	NA	NA	NA	<120	<120	<25	<25	<25	<25	<25	<50	<25	<25	<25	<25	<25	<25	630
23	3/23/2009	547.27	45.36	515.20	<2500	<2500	<500	<500	<500	<500	<500	<1,000	<500	<500	<500	<500	<500	<500	8,900 D
	6/17/2009	547.27	42.89	516.94	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	0.94 J,B
	9/17/2009	547.27	44.76	515.62	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
RW-6 (Recovery well, gauge & sample)	8/26/2003	NG	NG	NG	BRL	BRL	BRL	BRL	NA	NA	NA	BRL	BRL	BRL	BRL	NA	BRL	NA	140,000
	9/9/2005	NG	NG	NG	5	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	3,300 D
	2/22/2007	NG	NG	NG	BRL	BRL	NA	BRL	BRL	NA	BRL	BRL	BRL	BRL	BRL	NA	NA	NA	BRL
	6/20/2007	547.89	12.71	535.18	<25	<25	<5.0	<5.0	<5.0	NA	NA	<15	<5.0	<5.0	<5.0	<5.0	<5.0	NA	<5.0
	9/20/2007	547.89	17.40	530.49	<25	<25	NA	<5.0	<5.0	NA	NA	<15	<5.0	<5.0	<5.0	NA	NA	NA	<5.0
	12/19/2007	547.89	1.62	544.71	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<15	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
	3/18/2008	547.89	4.58	543.81	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<15	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
	6/4/2008	547.89	36.96	514.96	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<15	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
	9/11/2008	547.89	37.58	514.41	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<15	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
	12/17/2008	547.89	38.38	512.80	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
3/23/2009	547.89	7.91	540.84	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	
6/17/2009	547.89	33.77	517.80	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	
9/17/2009	547.89	9.91	539.06	<25	<25	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	

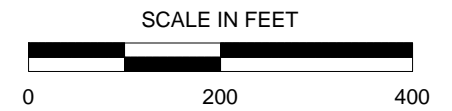
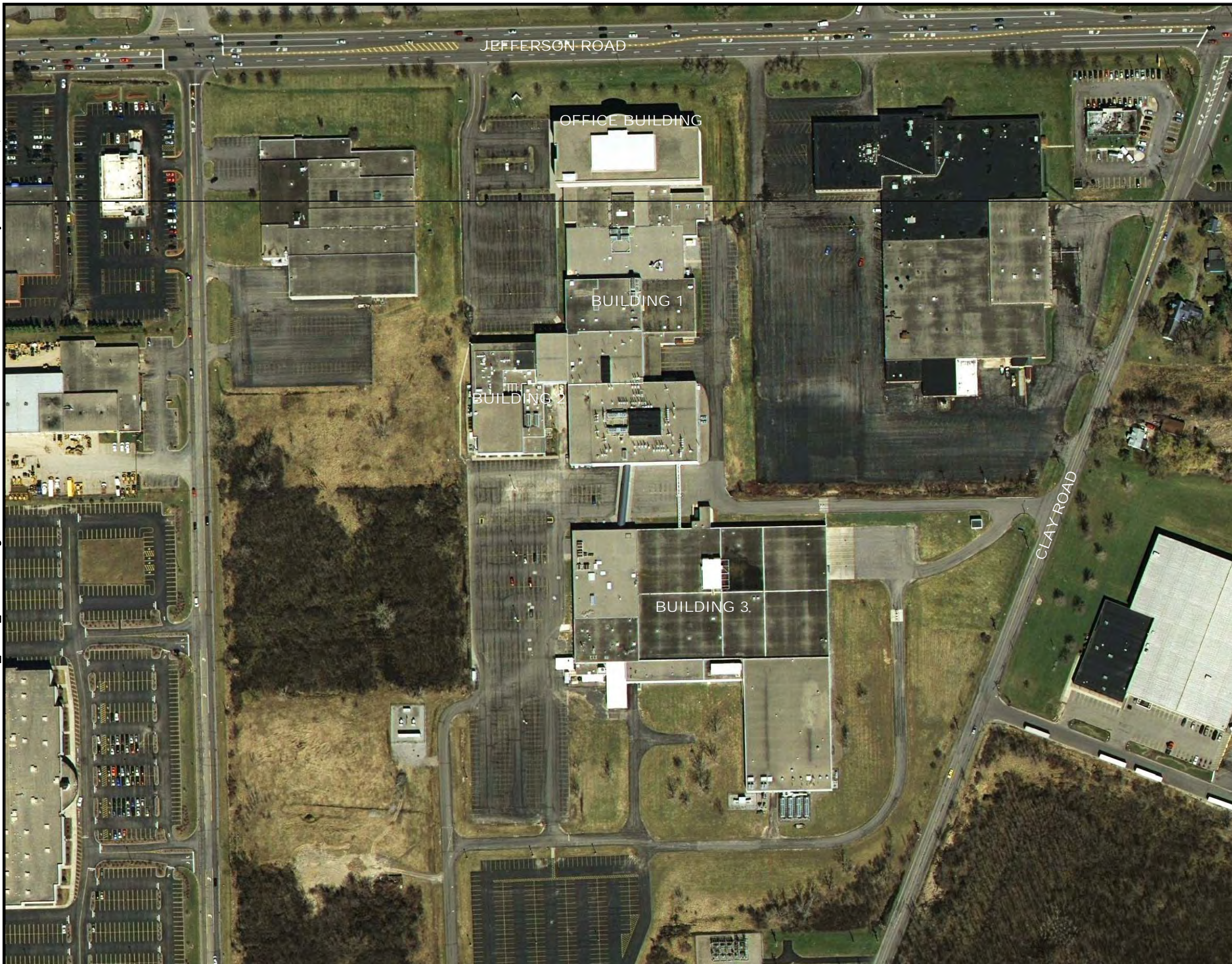
Notes:
<1.0 - Not detected at or above the laboratory reporting limit shown.
Corrected Water Table Elevation - Determined by trigonometry for wells MW-D9, MW-D11 to MW-D13, and RW-4 to RW-6
All units reported in µg/L - micrograms per liter (parts per billion)
BRL - Below laboratory reporting limits
NA - Not analyzed
BTEX - benzene, toluene, ethylbenzene, and total xylenes.
B - analyte found in the associated blank, as well as in the sample
D - Sample recovery unreproducible due to dilution.
DRY - Insufficient water to gauge or sample
J - The reported concentration is estimated (the result is less than the sample quantitation limit but greater than zero)
* - Sample results are from a pumping test
NA - not analyzed
NG - not gauged/or data not available
NS - not sampled
NYSDEC Standards and Guidance Values - New York State Department of Environmental Conservation Technical and Operational Guidance Series (TOGS) 1.1.1, Ambient Water Quality Standards and Guidance Values, June 1998 and Addendum April 2000

FIGURES

PLOTTED: 15 May 2009, 10:17am, J.Lubbers

CAD FILE: G:\CAD\Sanofi\JEFFERSON_ROAD_FACILITY.dwg LAYOUT: FIG-1

NEWBURGH, NY



LATITUDE: 43° 05' 03" N
 LONGITUDE: 77° 37' 19" W



SITE LOCATION

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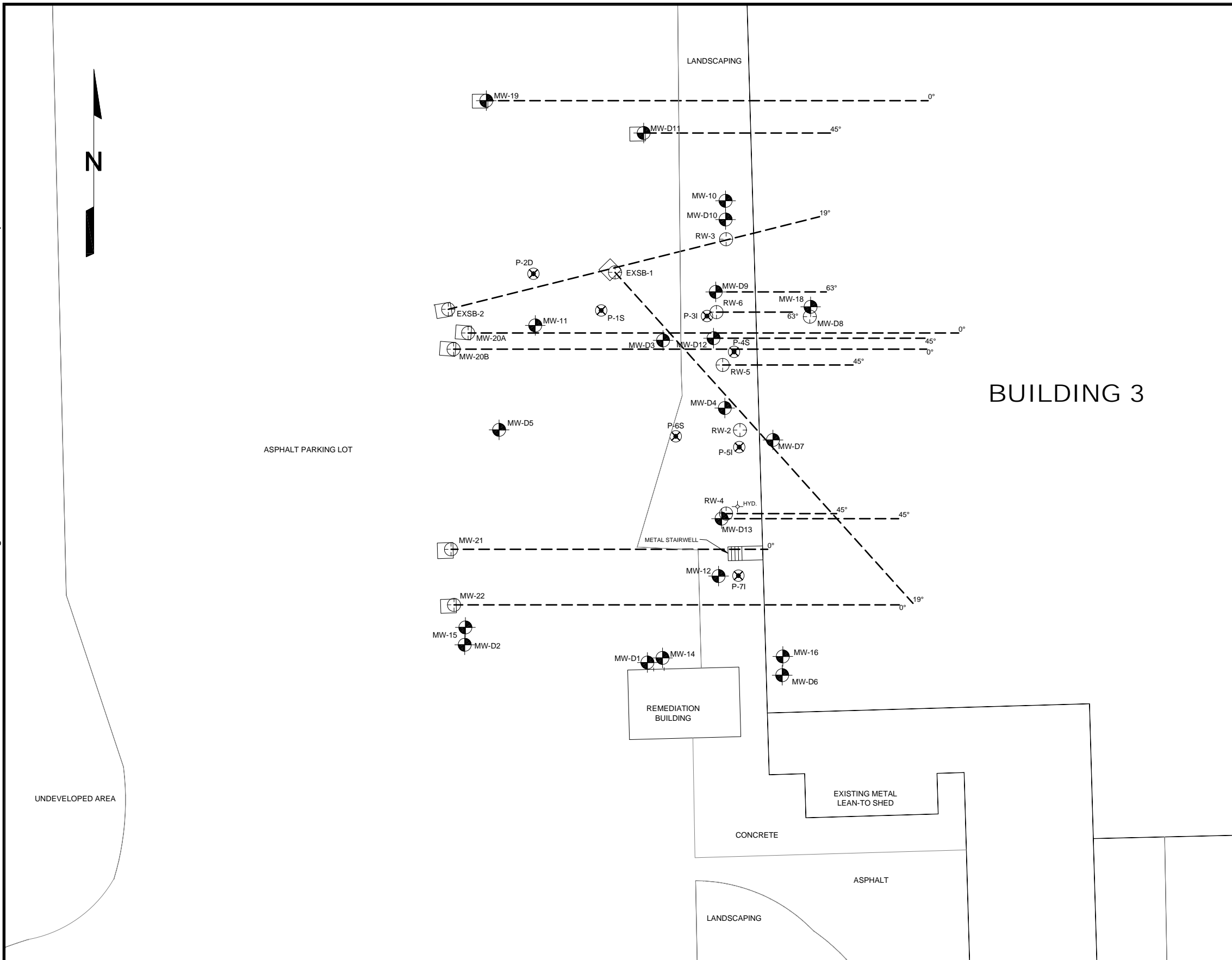
REFERENCES:

1. AERIAL IMAGES "w_14041124_12_09000_col_20051.sid" AND "w_14041126_12_09000_col_20051.sid" © NYS CLEARING HOUSE.
2. KLEINFELDER FIELD RESEARCH.



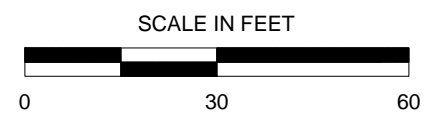
PROJECT NO.	84774
DRAWN:	05/13/2009
DRAWN BY:	JL
CHECKED BY:	AW
FILE NAME:	SANOFI_SITEPLAN.dwg

AREA MAP		FIGURE
UCB FACILITY NYSDEC VCP# V00126-8 755 JEFFERSON ROAD ROCHESTER		1
MONROE COUNTY	NEW YORK	



LEGEND

- MONITORING WELL
- RECOVERY WELL
- PIEZOMETER
- VAULT
- FIRE HYDRANT
- ANGLD WELL (ANGLE MEASURED FROM GROUND SURFACE)



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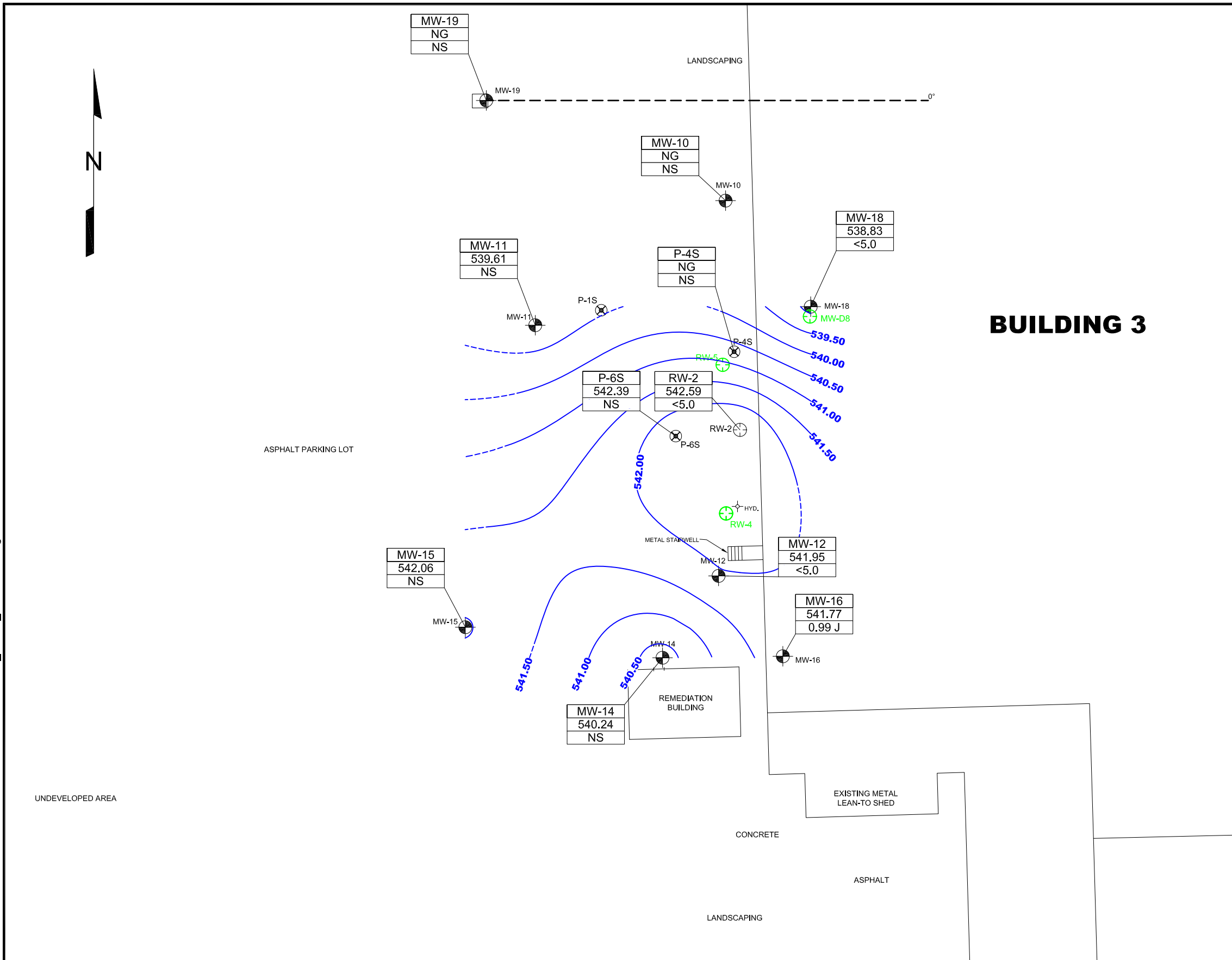
- REFERENCES:
- "WELL LOCATION MAP" PREPARED BY ERM, DATED SEPTEMBER, 2006.
 - KLEINFELDER FIELD RESEARCH.



PROJECT NO.	84774
DRAWN:	05/13/2009
DRAWN BY:	JL
CHECKED BY:	AW
FILE NAME:	SANOFI_SITEPLAN.dwg

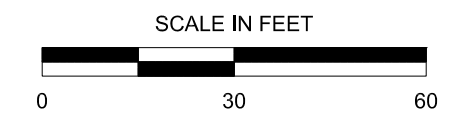
SITE PLAN	
UCB FACILITY NYSDEC VCP# V00126-8 755 JEFFERSON ROAD ROCHESTER	
MONROE COUNTY	NEW YORK

FIGURE
2



LEGEND

	MONITORING WELL			
	RECOVERY WELL			
	PIEZOMETER			
	VAULT			
	FIRE HYDRANT			
	ANGLED WELL (ANGLE MEASURED FROM GROUND SURFACE)			
<table border="1" style="display: inline-table; vertical-align: middle;"><tr><td>MW-18</td></tr><tr><td>538.83</td></tr><tr><td><5.0</td></tr></table>	MW-18	538.83	<5.0	MONITORING WELL IDENTIFICATION GROUNDWATER ELEVATION (FEET) METHYLENE CHLORIDE (µg/L)
MW-18				
538.83				
<5.0				
	WATER-TABLE CONTOUR (0.25 FOOT INTERVAL) (DASHED WHERE INFERRED)			
µg/L	MICROGRAMS PER LITER			
NG	NOT GAUGED			
NS	NOT SAMPLED			
J	THE REPORTED CONCENTRATION IS ESTIMATED			



NOTES:

- GROUNDWATER MONITORING WELLS WERE GAUGED AND SAMPLED ON SEPTEMBER 15-18, 2009.
- SYSTEM WAS NOT OPERATIONAL AT THE TIME OF GAUGING AND SAMPLING.

REFERENCES:

- "WELL LOCATION MAP" PREPARED BY ERM, DATED SEPTEMBER, 2006.
- KLEINFELDER FIELD RESEARCH.

PROJECT NO.	105651
DRAWN:	11/19/2009
DRAWN BY:	JL
CHECKED BY:	AW
FILE NAME:	SANOFI_QEEMR.dwg

GROUNDWATER CONTOUR AND CONCENTRATION MAP SHALLOW WELLS

UCB FACILITY
NYSDEC VCP# V00126-8
755 JEFFERSON ROAD
ROCHESTER

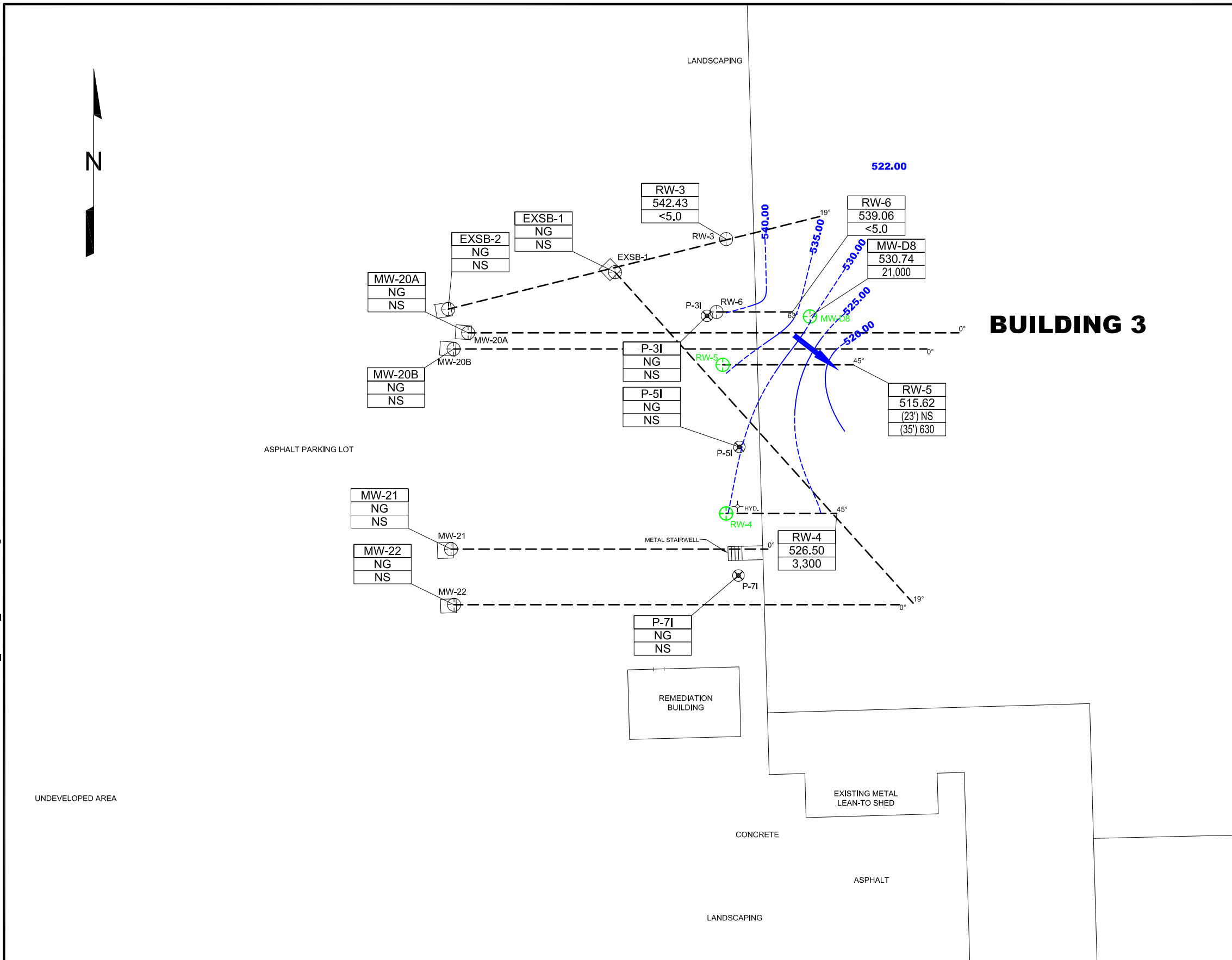
MONROE COUNTY NEW YORK

FIGURE
3

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CAD FILE: G:\CAD\Sanofi\JEFFERSON_ROAD_FACILITY\dwg\QEEMR\ LAYOUT: FIG-4

NEWBURGH, NY



LEGEND

RECOVERY WELL
 PIEZOMETER
 VAULT
 FIRE HYDRANT
 ANGLD WELL (ANGLE MEASURED FROM GROUND SURFACE)

RW-6
539.06
<5.0

 MONITORING WELL IDENTIFICATION
GROUNDWATER ELEVATION (FEET)
METHYLENE CHLORIDE (µg/L)
 WATER-TABLE CONTOUR (5.00 FOOT INTERVAL)
(DASHED WHERE INFERRED)
µg/L MICROGRAMS PER LITER
NG NOT GAUGED
NS NOT SAMPLED

SCALE IN FEET

0 30 60

NOTES:

- GROUNDWATER MONITORING WELLS WERE GAUGED AND SAMPLED ON SEPTEMBER 15-18, 2009.
- SYSTEM WAS NOT OPERATIONAL AT THE TIME OF GAUGING AND SAMPLING.

REFERENCES:

- "WELL LOCATION MAP" PREPARED BY ERM, DATED SEPTEMBER, 2006.
- KLEINFELDER FIELD RESEARCH.

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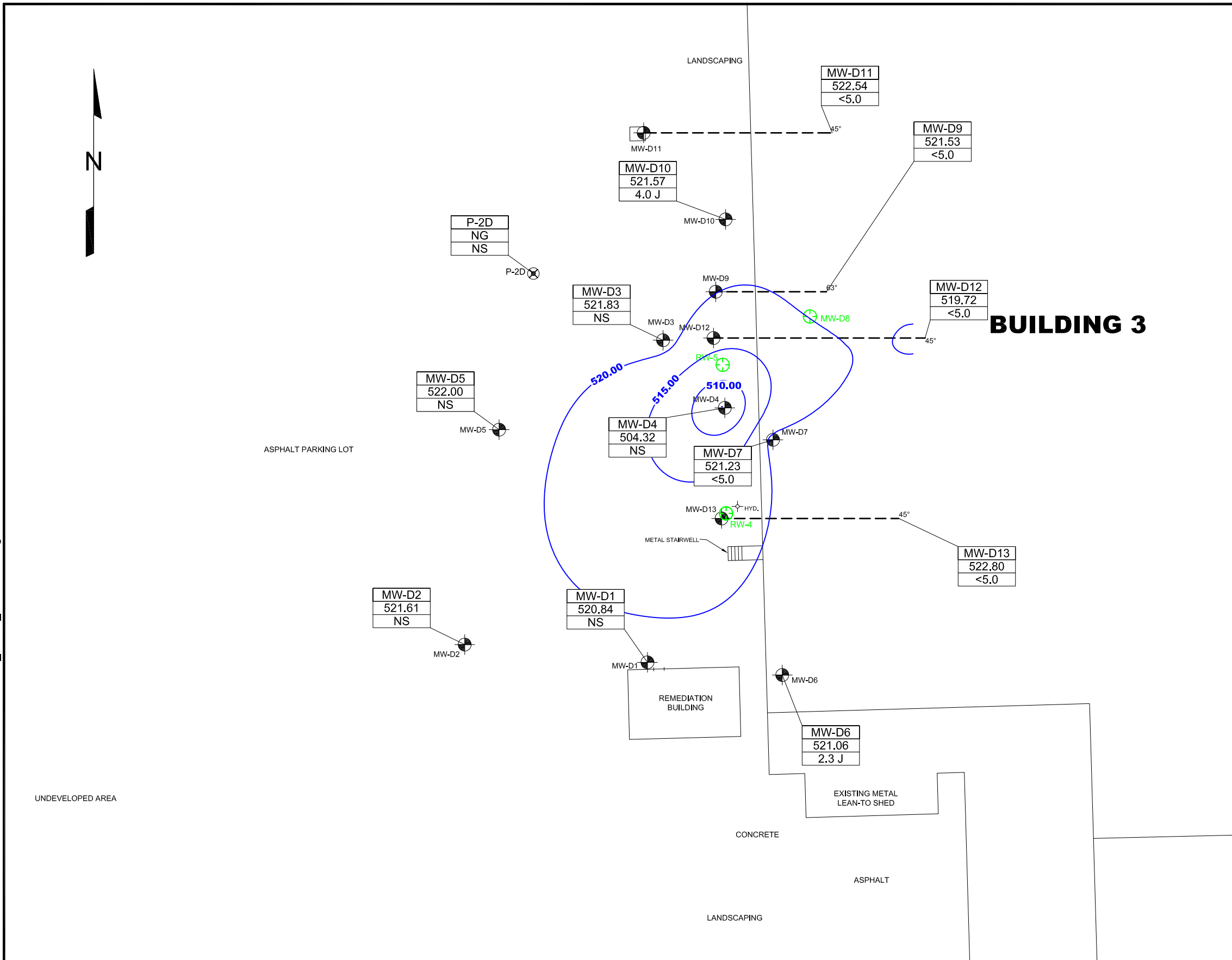
PROJECT NO.	105651
DRAWN:	11/19/2009
DRAWN BY:	JL
CHECKED BY:	AW
FILE NAME:	SANOI_QEEMR.dwg

GROUNDWATER CONTOUR AND CONCENTRATION MAP INTERMEDIATE WELLS

UCB FACILITY
 NYSDEC VCP# V00126-8
 755 JEFFERSON ROAD
 MONROE COUNTY ROCHESTER NEW YORK

FIGURE
4

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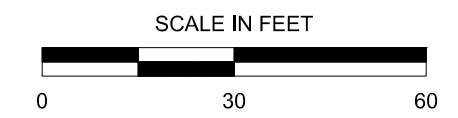
LEGEND

- MONITORING WELL
- RECOVERY WELL
- PIEZOMETER
- VAULT
- FIRE HYDRANT
- ANGLED WELL (ANGLE MEASURED FROM GROUND SURFACE)

MW-D4	522.07	NS
-------	--------	----

WATER-TABLE CONTOUR (5.00 FOOT INTERVAL) (DASHED WHERE INFERRED)

µg/L MICROGRAMS PER LITER
 NG NOT GAUGED
 NS NOT SAMPLED
 J THE REPORTED CONCENTRATION IS ESTIMATED



NOTES:

- GROUNDWATER MONITORING WELLS WERE GAUGED AND SAMPLED ON SEPTEMBER 15-18, 2009.
- SYSTEM WAS NOT OPERATIONAL AT THE TIME OF GAUGING AND SAMPLING.

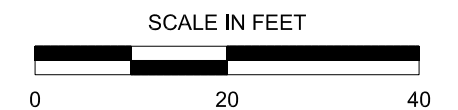
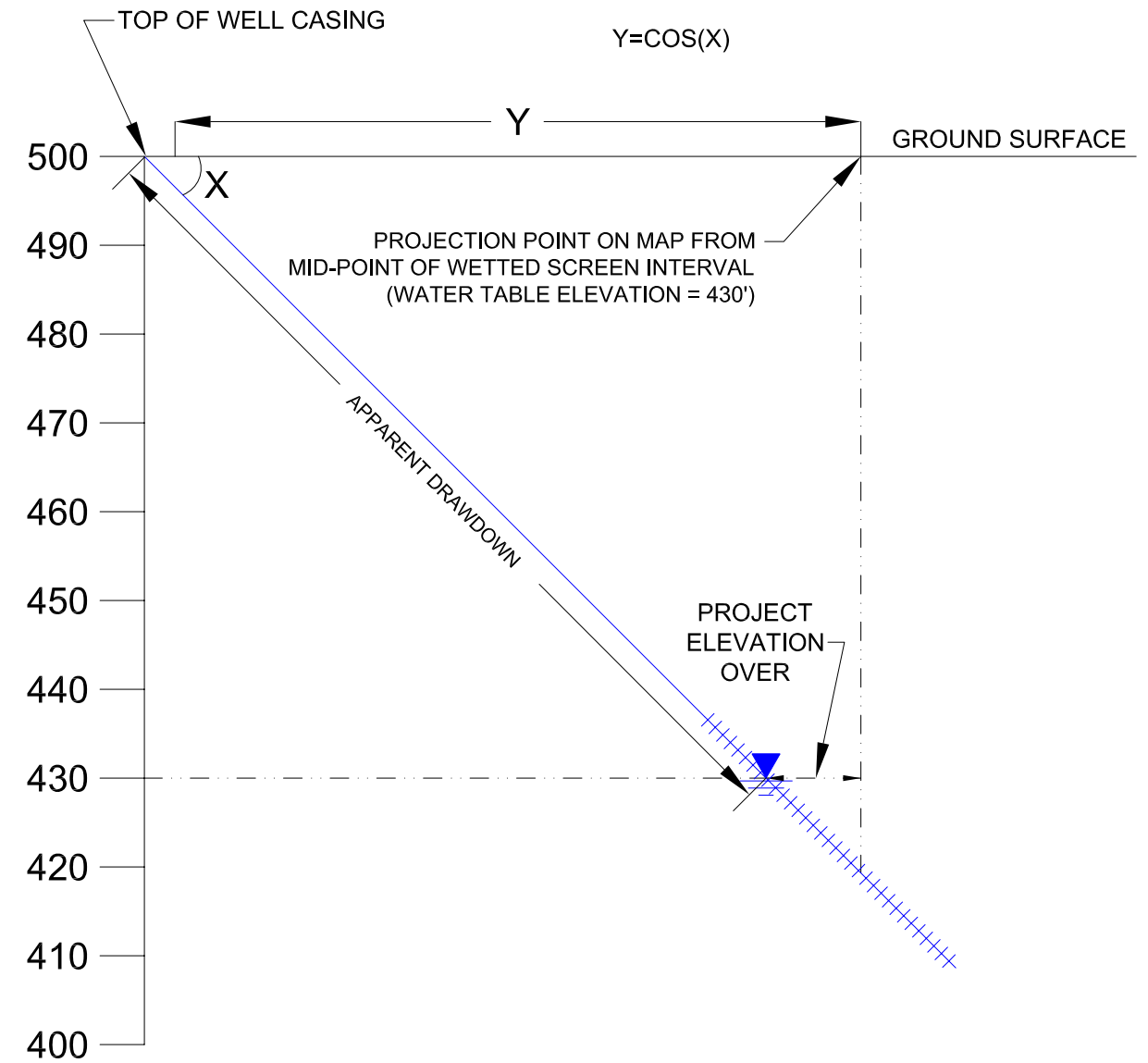
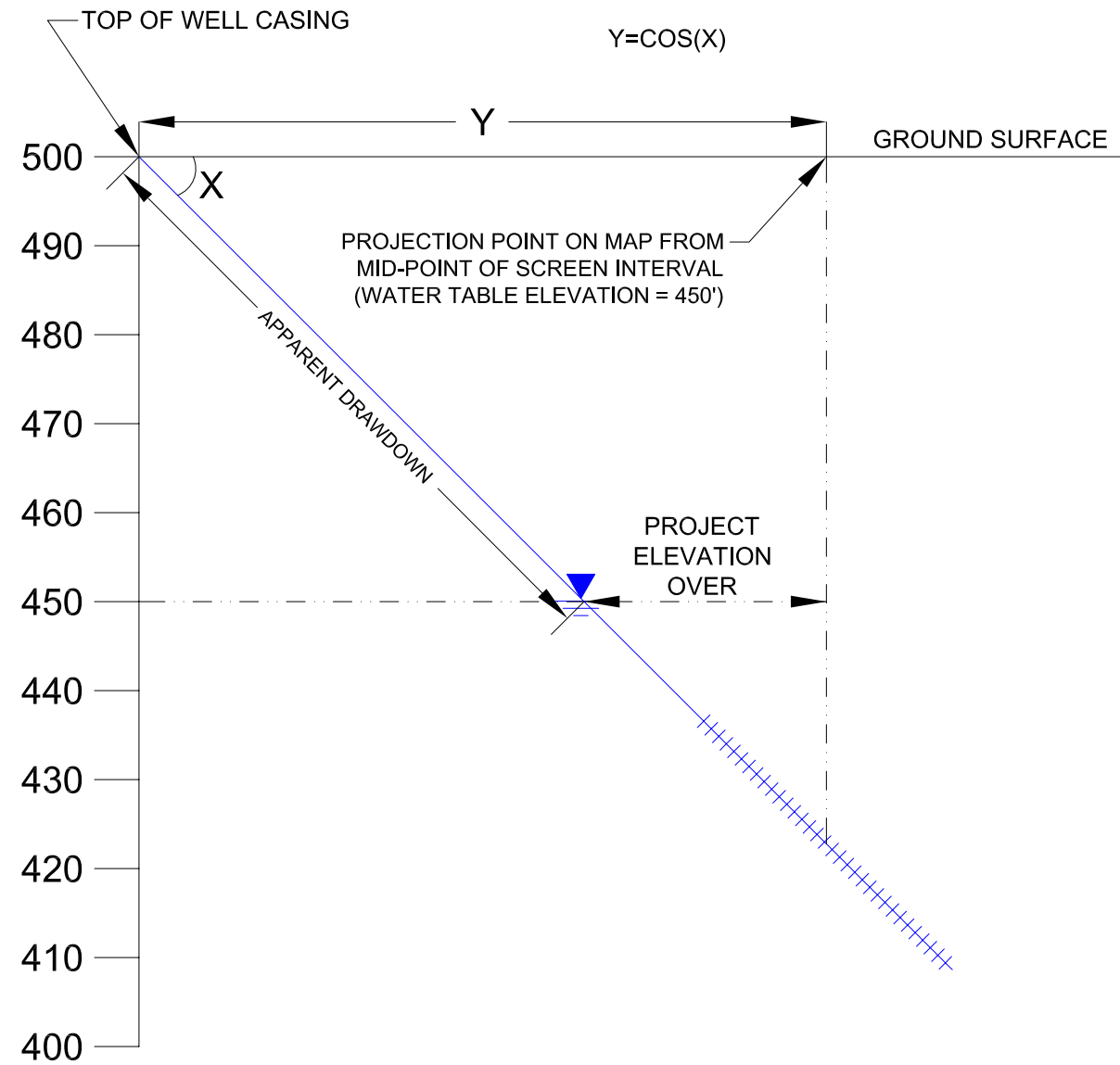
REFERENCES:

- "WELL LOCATION MAP" PREPARED BY ERM, DATED SEPTEMBER, 2006.
- KLEINFELDER FIELD RESEARCH.

PROJECT NO.	105651
DRAWN:	11/19/2009
DRAWN BY:	JL
CHECKED BY:	AW
FILE NAME:	SANOFI_QEEMR.dwg

GROUNDWATER CONTOUR AND CONCENTRATION MAP DEEP WELLS		FIGURE 5
UCB FACILITY NYSDEC VCP# V00126-8 755 JEFFERSON ROAD MONROE COUNTY ROCHESTER NEW YORK		

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NEWBURGH, NY

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- REFERENCES:
1. "WELL LOCATION MAP" PREPARED BY ERM, DATED SEPTEMBER, 2006.
 2. KLEINFELDER FIELD RESEARCH.



PROJECT NO.	84774
DRAWN:	8/12/2009
DRAWN BY:	CTH
CHECKED BY:	AW
FILE NAME:	SANOI_QEEMR.dwg

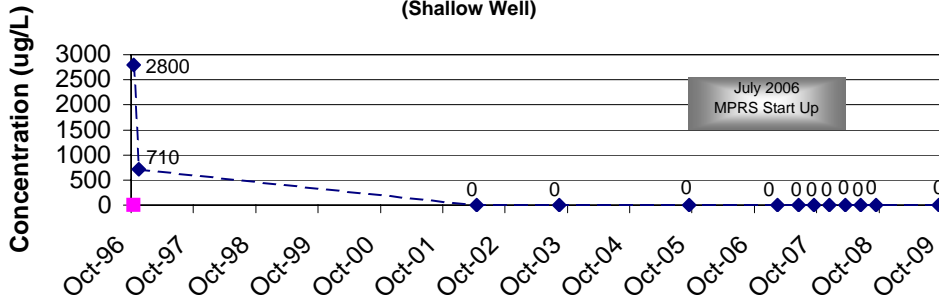
**DIAGONAL WELL
POTENTIOMETRIC CONVERSION**

UCB FACILITY
NYSDEC VCP# V00126-8
755 JEFFERSON ROAD
ROCHESTER
MONROE COUNTY NEW YORK

FIGURE

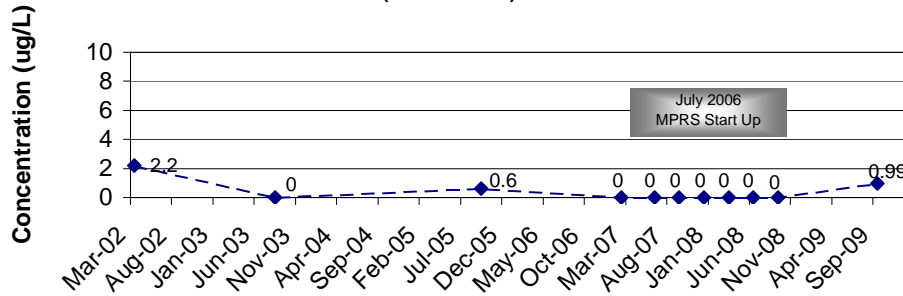
6

Figure 7
Methylene Chloride Concentration in MW-12
 (Shallow Well)



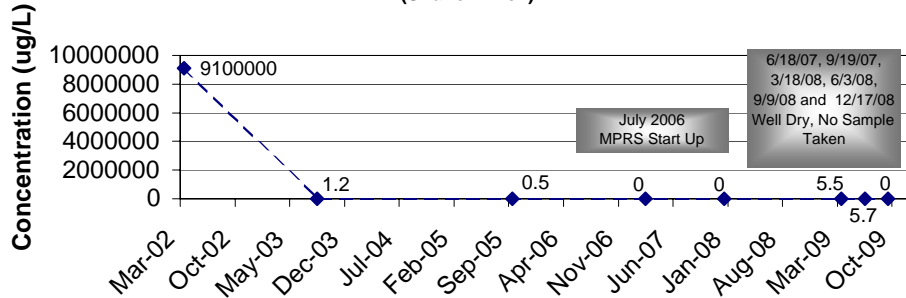
Note: 1) NYSDEC Groundwater Standard for Methylene Chloride is 5 ug/L
 2) July 2006 - System Start-up
 3) Y Value of 0 means No VOCs Detected at Concentrations Above Laboratory Reporting Limit

Figure 8
Methylene Chloride Concentration in MW-16
 (Shallow Well)



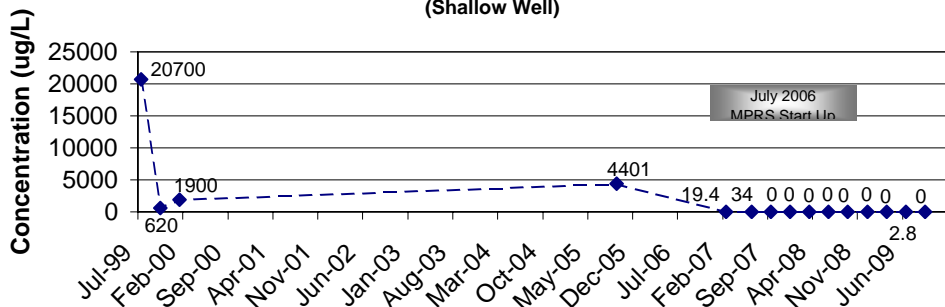
Note: 1) NYSDEC Groundwater Standard for Methylene Chloride is 5 ug/L
 2) July 2006 - System Start-up
 3) Y Value of 0 means No VOCs Detected at Concentrations Above Laboratory Reporting Limit

Figure 9
Methylene Chloride Concentration in MW-18
 (Shallow Well)



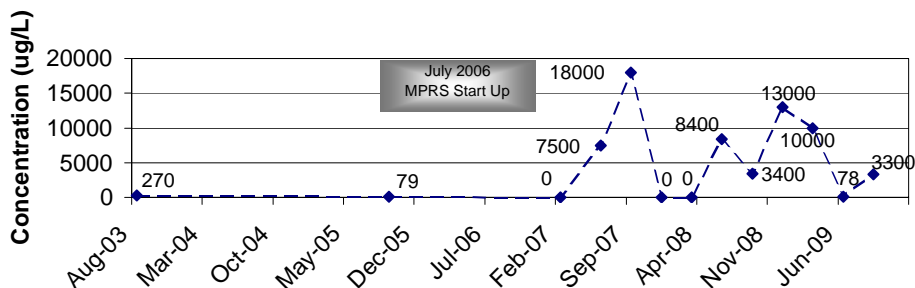
Note: 1) NYSDEC Groundwater Standard for Methylene Chloride is 5 ug/L
 2) July 2006 - System Start-up
 3) Y Value of 0 means No VOCs Detected at Concentrations Above Laboratory Reporting Limit

Figure 10
Methylene Chloride Concentration in RW-2
 (Shallow Well)



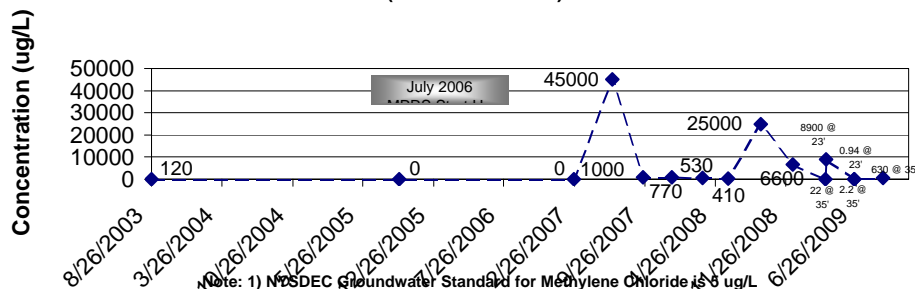
Note: 1) NYSDEC Groundwater Standard for Methylene Chloride is 5 ug/L
 2) July 2006 - System Start-up
 3) Y Value of 0 means No VOCs Detected at Concentrations Above Laboratory Reporting Limit
 4) RW-2 was not utilized as a recovery well prior to groundwater sampling

Figure 11
Methylene Chloride Concentration in RW-4
 (Intermediate Well)



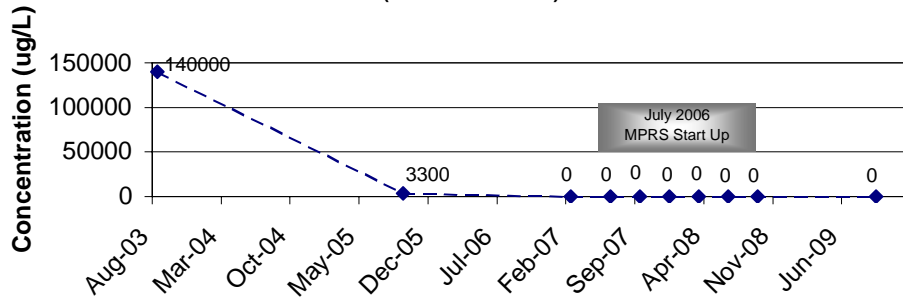
Note: 1) NYSDEC Groundwater Standard for Methylene Chloride is 5 ug/L
 2) July 2006 - System Start-up
 3) Y Value of 0 means No VOCs Detected at Concentrations Above Laboratory Reporting Limit
 4) RW-4 was utilized as a recovery well prior to groundwater sampling

Figure 12
Methylene Chloride Concentration in RW-5
 (Intermediate Well)



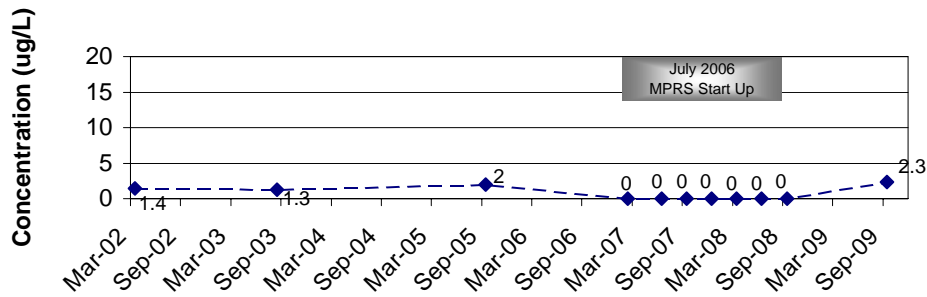
Note: 1) NYSDEC Groundwater Standard for Methylene Chloride is 5 ug/L
 2) July 2006 - System Start-up
 3) Y Value of 0 means No VOCs Detected at Concentrations Above Laboratory Reporting Limit
 4) RW-5 was utilized as a recovery well prior to groundwater sampling

Figure 13
Methylene Chloride Concentration in RW-6
 (Intermediate Well)



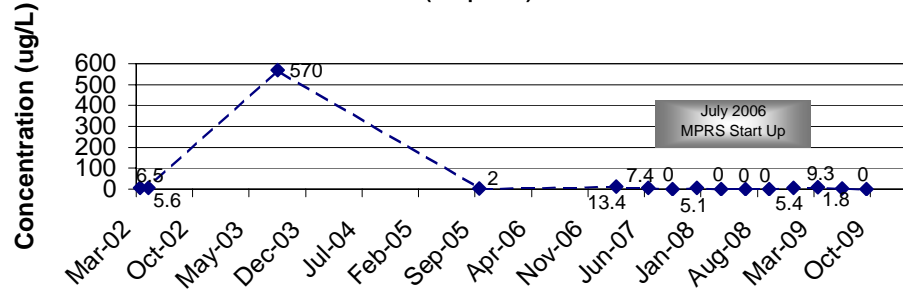
Note: 1) NYSDEC Groundwater Standard for Methylene Chloride is 5 ug/L
 2) July 2006 - System Start-up
 3) Y Value of 0 means No VOCs Detected at Concentrations Above Laboratory Reporting Limit
 4) RW-6 was not utilized as a recovery well prior to groundwater sampling

Figure 14
Methylene Chloride Concentration in MW-D6
 (Deep Well)



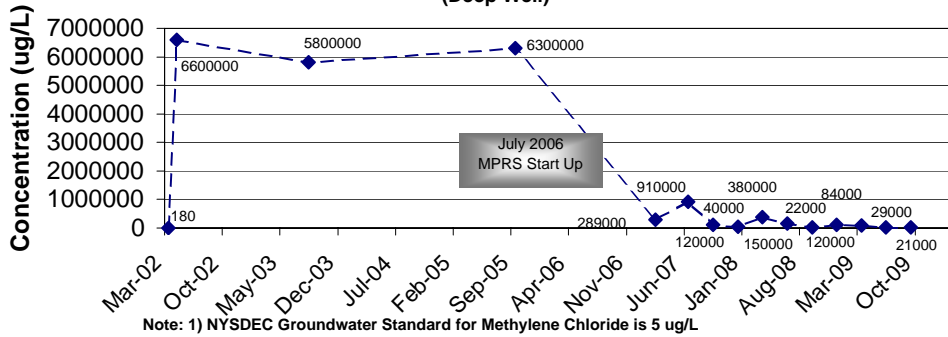
Note: 1) NYSDEC Groundwater Standard for Methylene Chloride is 5 ug/L
 2) July 2006 - System Start-up
 3) Y Value of 0 means No VOCs Detected at Concentrations Above Laboratory Reporting Limit

Figure 15
Methylene Chloride Concentration in MW-D7
 (Deep Well)



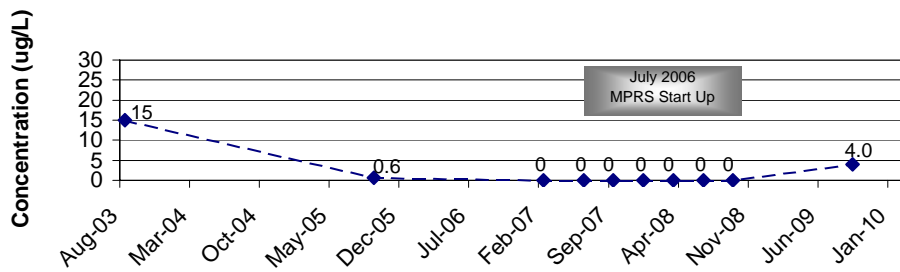
Note: 1) NYSDEC Groundwater Standard for Methylene Chloride is 5 ug/L
 2) July 2006 - System Start-up
 3) Y Value of 0 means No VOCs Detected at Concentrations Above Laboratory Reporting Limit

Figure 16
Methylene Chloride Concentration in MW-D8
 (Deep Well)



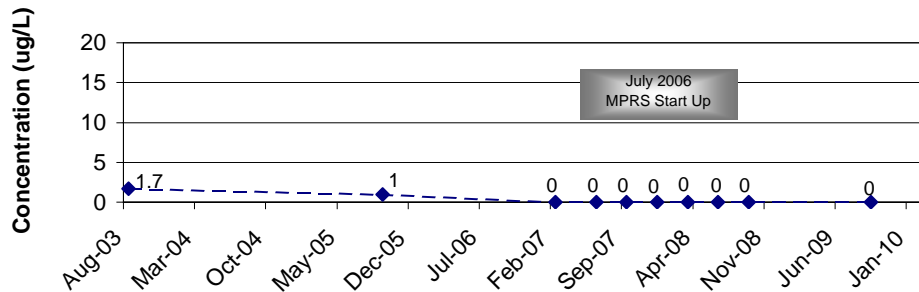
Note: 1) NYSDEC Groundwater Standard for Methylene Chloride is 5 ug/L
 2) July 2006 - System Start-up
 3) Y Value of 0 means No VOCs Detected at Concentrations Above Laboratory Reporting Limit
 4) MW-D8 was utilized as a recovery well prior to groundwater sampling

Figure 17
Methylene Chloride Concentration in MW-D10
 (Deep Well)



Note: 1) NYSDEC Groundwater Standard for Methylene Chloride is 5 ug/L
 2) July 2006 - System Start-up
 3) Y Value of 0 means No VOCs Detected at Concentrations Above Laboratory Reporting Limit

Figure 18
Methylene Chloride Concentration in MW-D11
 (Deep Well)



Note: 1) NYSDEC Groundwater Standard for Methylene Chloride is 5 ug/L
 2) July 2006 - System Start-up
 3) Y Value of 0 means No VOCs Detected at Concentrations Above Laboratory Reporting Limit

Figure 19
Methylene Chloride Concentration in MW-D12
 (Deep Well)

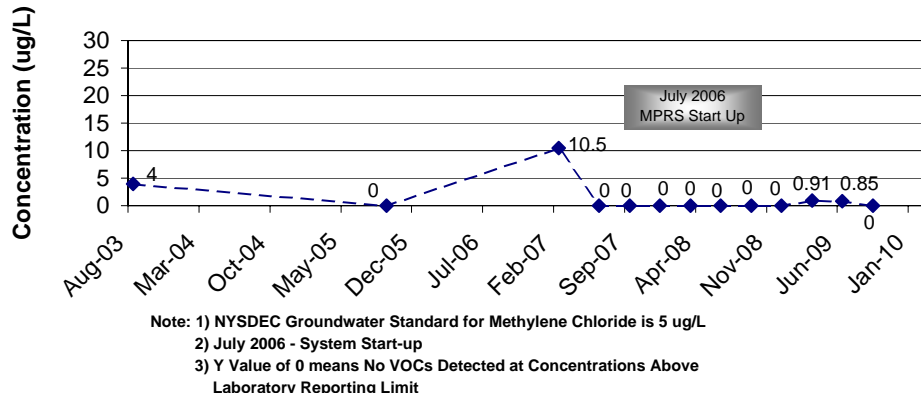
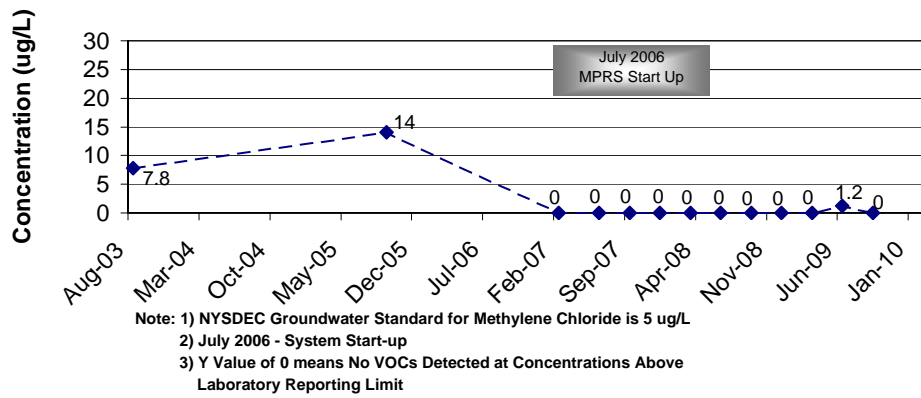


Figure 20
Methylene Chloride Concentration in MW-D13
 (Deep Well)



Appendix A
Monthly Progress Reports – July, August and September 2009



August 11, 2009

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: Monthly Progress Report – July 2009
755 Jefferson Road Facility – Henrietta, New York
NYSDEC VCP Number V00126-8

**Key Actions
This Period:**

- **July 1 – July 31, 2009.** The system was intermittently operational due to the planned NYSDEC approved pulsing activities.

Operations Metrics (July 1 – July 31)

- Operational Time: 144 out of a scheduled 144 hours of operation.
- Uptime Efficiency: 100%
- Volume of Groundwater Treated: 4,937 gallons.
 - Discharged to: The sanitary sewer system.
- Total estimated VOC mass recovered to date: 137.2 lbs.
- Total estimated VOC mass recovered during July: 0.15 lbs.
- Mean estimated VOC mass removal rate for July 2009 versus June 2009: 0.001 versus 0.0002 lbs/hr.
- General weather conditions: Above normal precipitation and cool temperatures as compared to historical data.

Tables, Figures and Graphs

- Table 1: May Treated Waste Water Flow/Vapor Monitoring Data.
- Table 2: May Recovery Well Rotation Data.
- Figures 1-9: Remedial Effectiveness and Efficiency Platform (REEP) graphs
- Figures 2A and 3A: Selected Remedial Effectiveness and Efficiency Platform (REEP) graphs showing results from March 1, 2008 to present.

**Problems/
Resolutions:**

- None

**Analytical Data
Received:**

- The June 2009 MW-D8 vapor sample associated with the Pulsing Test.

**Documents
Submitted:**

- Monthly Progress Report for June 2009 dated July 10, 2009.

**Anticipated
Actions –
August
2009:**

- Continue NYSDEC approved pulsing program until permission is granted to terminate system operation.
- Continue drafting the Post Remedial Construction OM&M, FER, Closure Request and Certification.

Comments:

- The attached REEP information is to be utilized as a subjective representation of the overall effectiveness/performance of the system as we are using discontinuous data and PID measurements for the removal calculations. We do not intend this tool as a definitive summary of recovered mass.
- MPRS operation and efficiency, inclusive of the replacement LRP pump and associated upgrades and maintenance, will continue to be monitored.

**NYSDEC-
Approved Field
Decisions:**

- Continuation of pulsing of MPRS system in accordance with the procedure presented to NYSDEC.

If you have any questions regarding this monthly report or progress on the project, please don't hesitate to contact me at 513-314-7543 or rbethel@qmg-inc.com. Deleted: -----Page Break-----

Sincerely,
QUANTUM MANAGEMENT GROUP, INC.



Rick Bethel
Senior Associate

Attachments

cc:
Mr. Jeffrey M. Kosmala, P.E. (MCDOH)
Mr. Michael Bogdan (Sanofi-Aventis)
Mr. Kevin Bruno (RFBC Law)
Mr. Mark Byrne, P.E. (Town of Henrietta)
Ms. Libby Ford, (Nixon Peabody)
Mr. Joseph Hausbeck, Esq. (NYSDEC)
Mr. George Hollerbach, P.E. (Quantum)

Ms. Melissa Menetti (NYSDOH)
Mr. David Panipinto (UCB)
Mr. Bart Putzig, P.E. (NYSDEC)
Mr. Sean Keenan (MCDES)
Mr. John Lang, P.E. (Quantum)
Mr. Greg Light (UCB)

Tables

TABLE 1 - TREATED WASTE WATER FLOW/VAPOR MONITORING DATA
MCA REMEDIATION SYSTEM
755 JEFFERSON ROAD, HENRIETTA, NEW YORK
NYSDEC VCP NUMBER V00126-8
July 2009

Date	Time ¹	Cumulative Hours ²	Total Flow ³ Gallons	Flow Rate ⁴ Gal/Min	Cumulative Gallons ^{5,6}	Influent PID (ppm)	Effluent PID (ppm)
6/30/2009	9:01	38588.5	1,066	0.9	292,064	0.2	0.0
7/1/2009	8:58	38612.5	1,117	0.8	293,181	1.1	0.0
7/2/2009	12:52	38640.4	1,140	0.7	294,321	1.3	0.0
7/6/2009	9:06	38732.6	2,680	0.5	297,001	0.9	0.0

² Cumulative Hours represents the number of run-hours since MCA remediation system start-up on 12 July 2006.

Gallons represents

Gallons/Minute

Gallons represents

readings collected

⁷ n/a: data not

available

TABLE 2 - RECOVERY WELL ROTATION DATA
MCA REMEDIATION SYSTEM
755 JEFFERSON ROAD, HENRIETTA, NEW YORK
NYSDEC VCP NUMBER V00126-8
July 2009

Date	Well Rotation Clusters								
	EXSB-2	MW-D8	MW -21	MW-22	MW-20A	MW-20B	RW-6	RW-5	RW-4
July 1-6		X						X	X
July 7-31	System shut down as part of NYSDEC approved pulsing program								

Figures

Figure 1

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
July 2009

Total VOC Mass Removed (Vapor and Ground Water Combined)

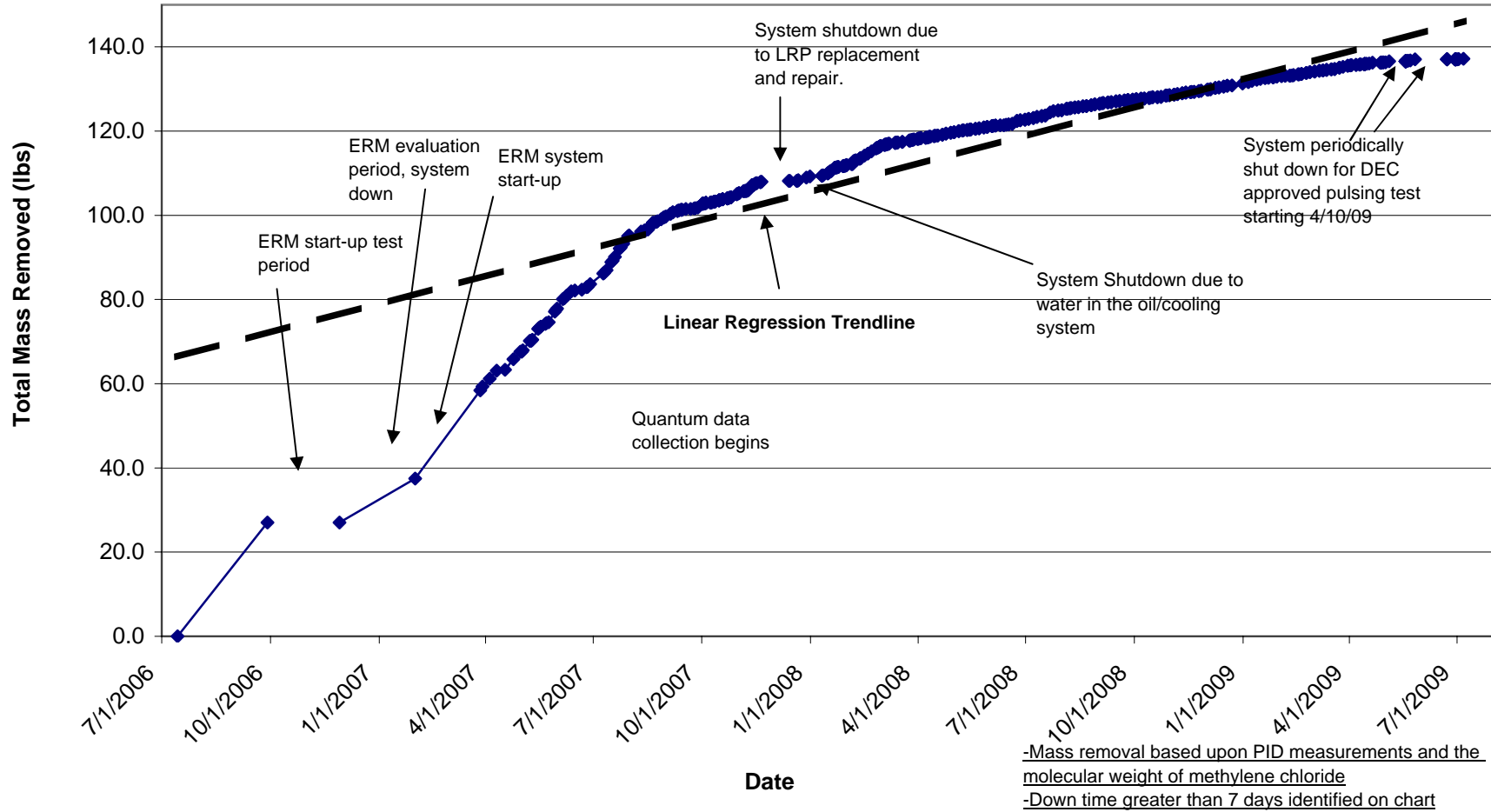


Figure 2

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
July 2009

Total VOC Mass Removal Rate (Vapor & Ground Water Combined)

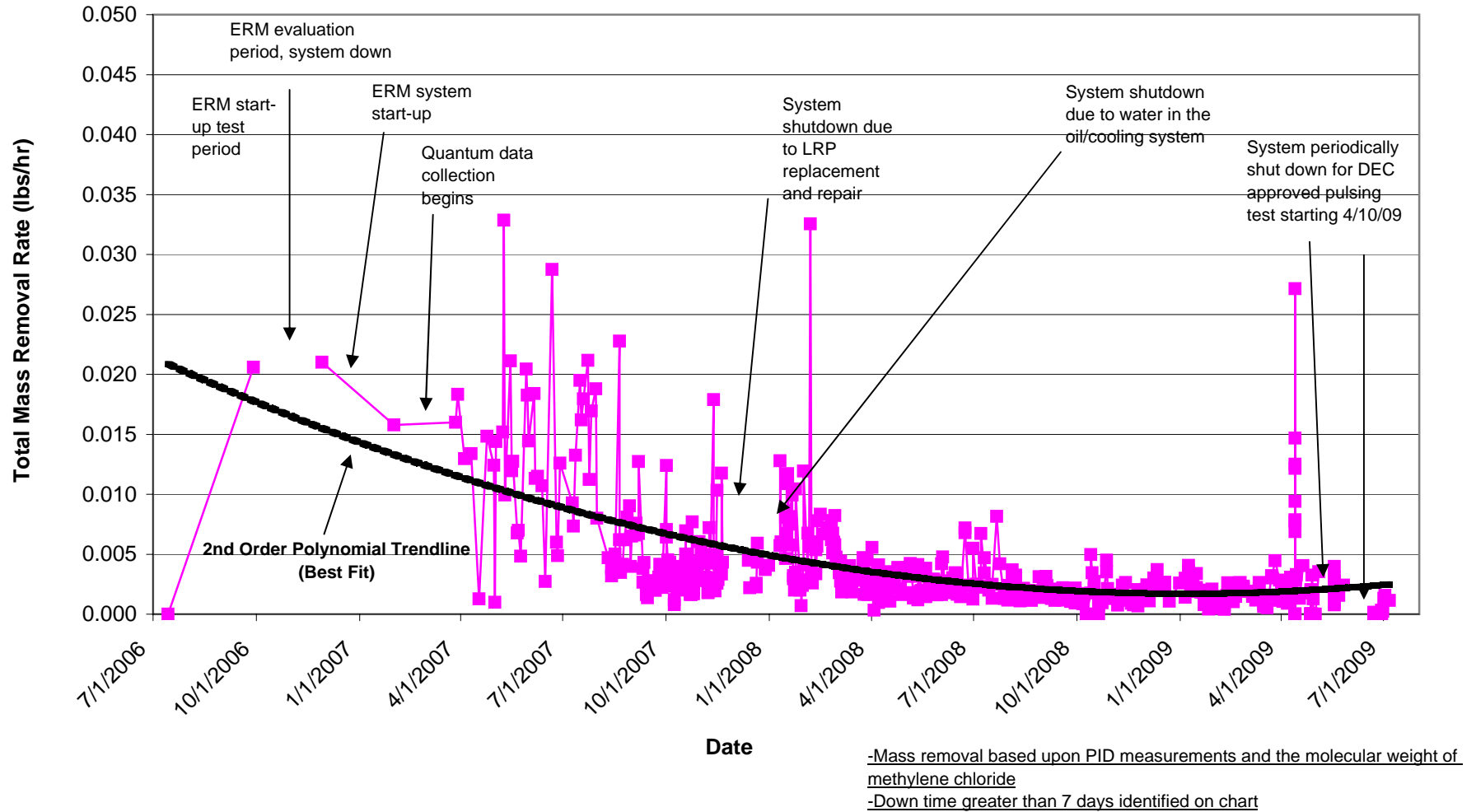
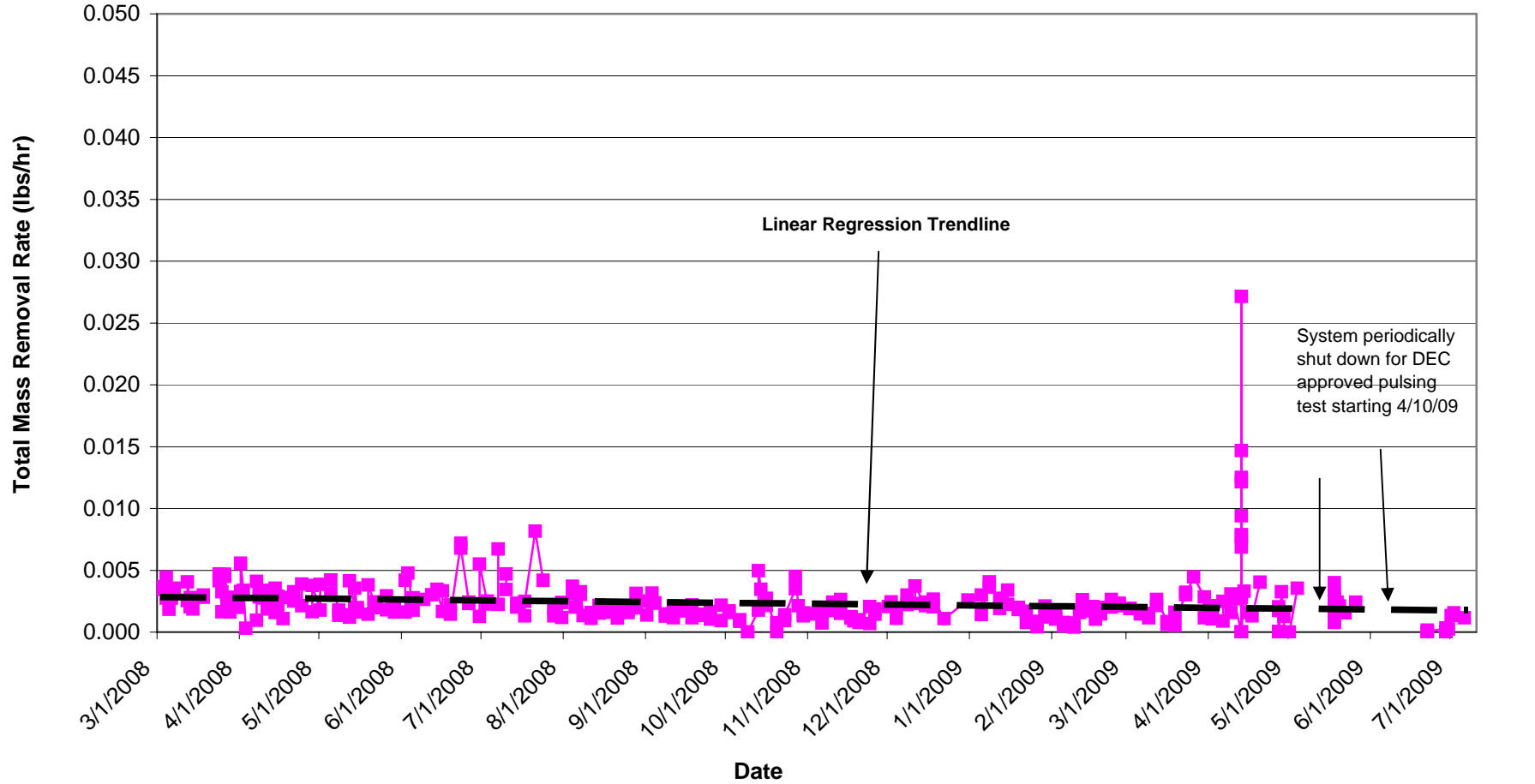


Figure 2A

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
July 2009

Total VOC Mass Removal Rate (Vapor & Ground Water Combined) Since March 2008



Mass removal based upon PID measurements and the molecular weight of methylene chloride

Figure 3

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
July 2009

Vapor Mass Removal Rate

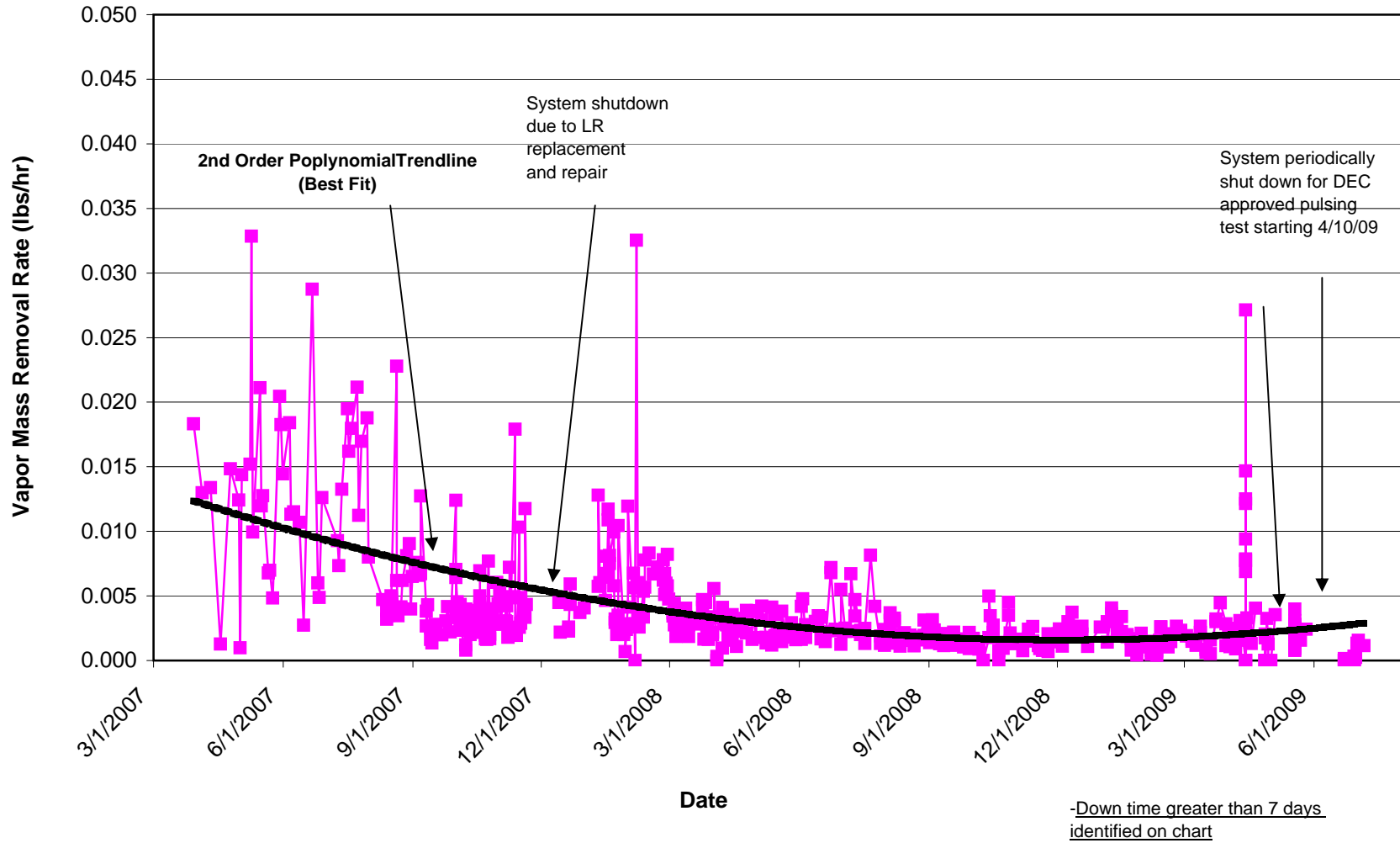


Figure 3A

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
July 2009

Vapor Mass Removal Rate Since March 2008

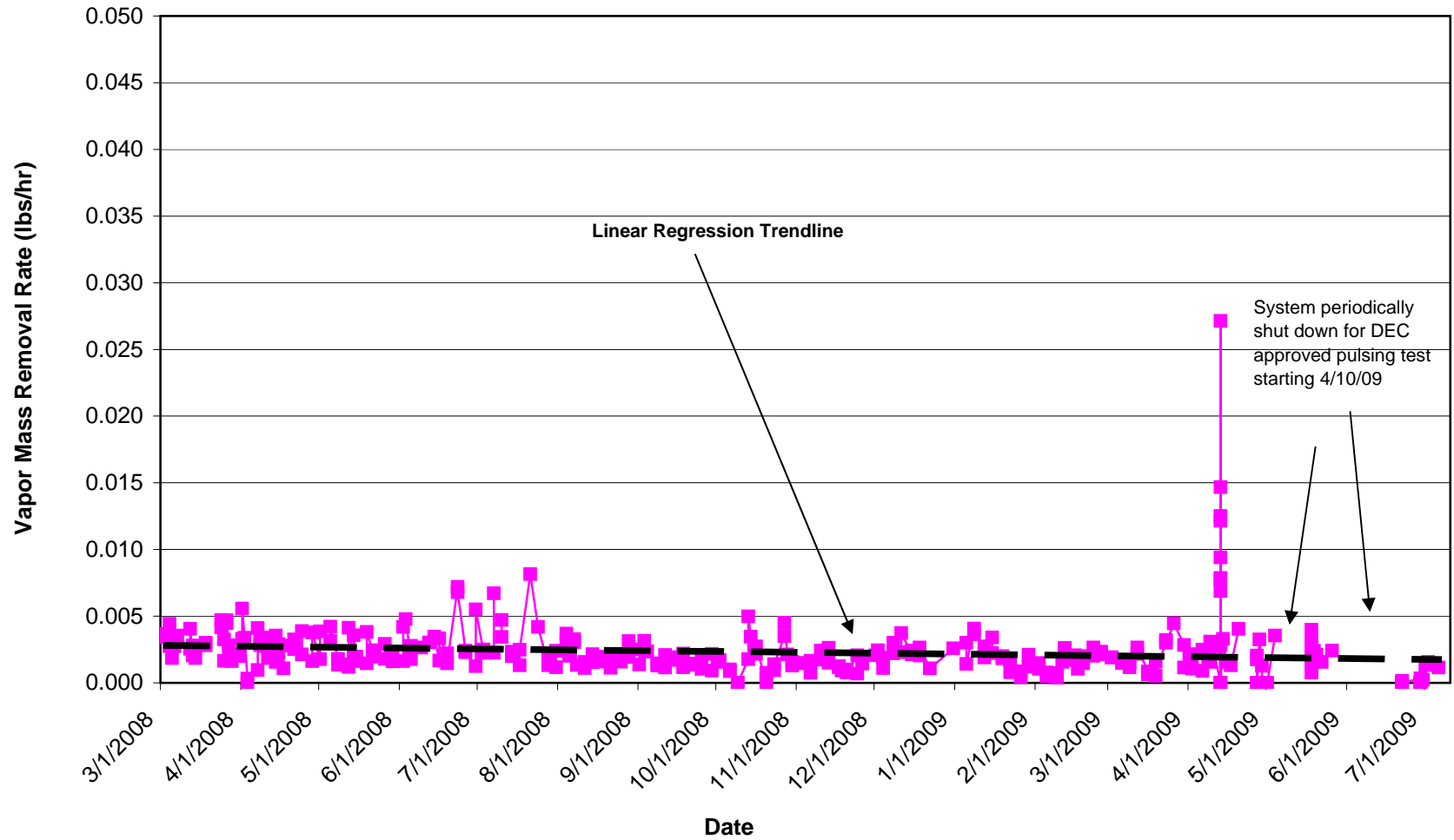
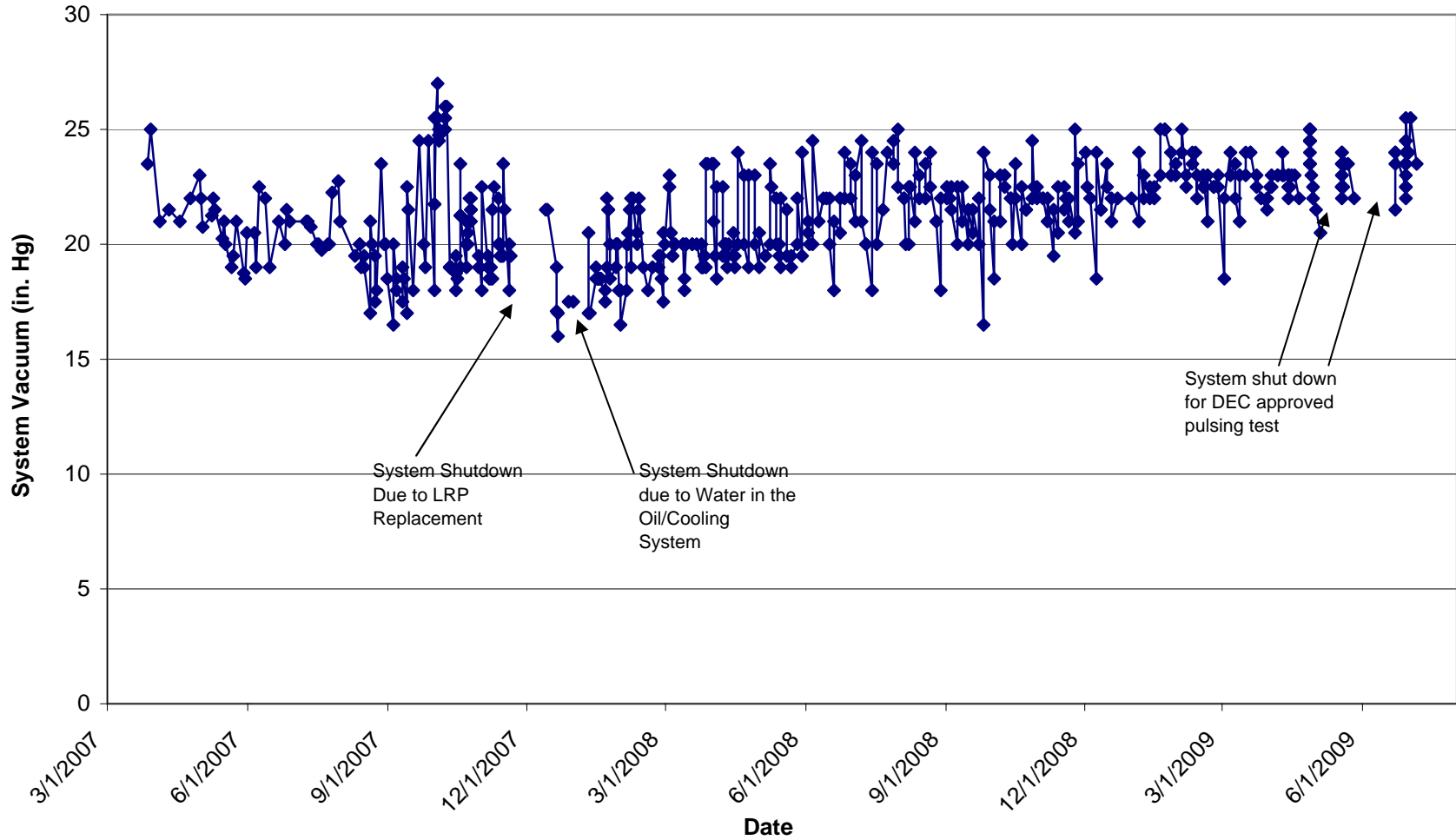


Figure 4

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
July 2009

System Vacuum

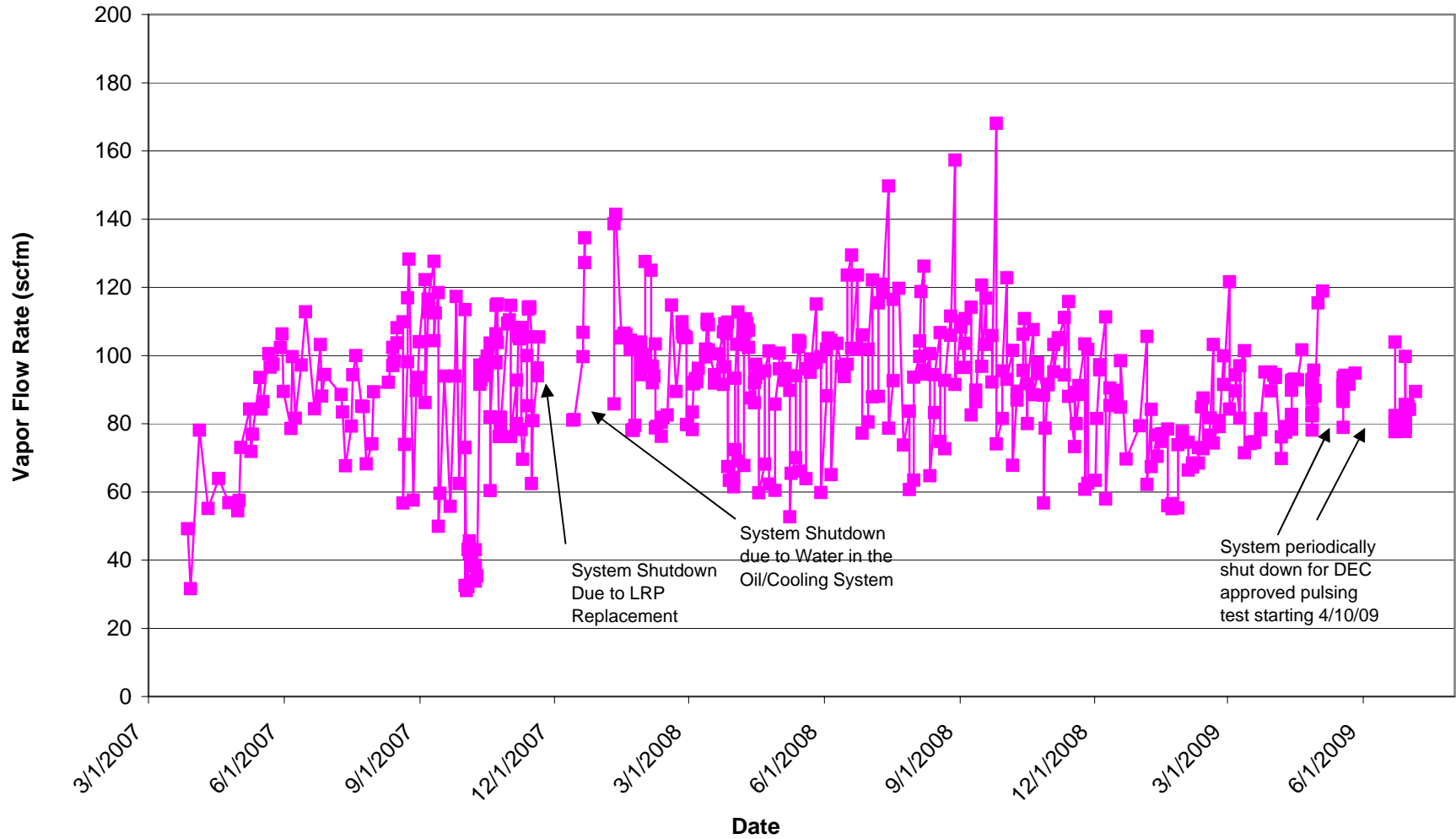


-Down time greater than 7 days identified on chart

Figure 5

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
July 2009

System Vapor Flow Rate



-Down time greater than 7 days identified on chart

Figure 6

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
July 2009

Total MeCl Mass Removed (Ground Water)

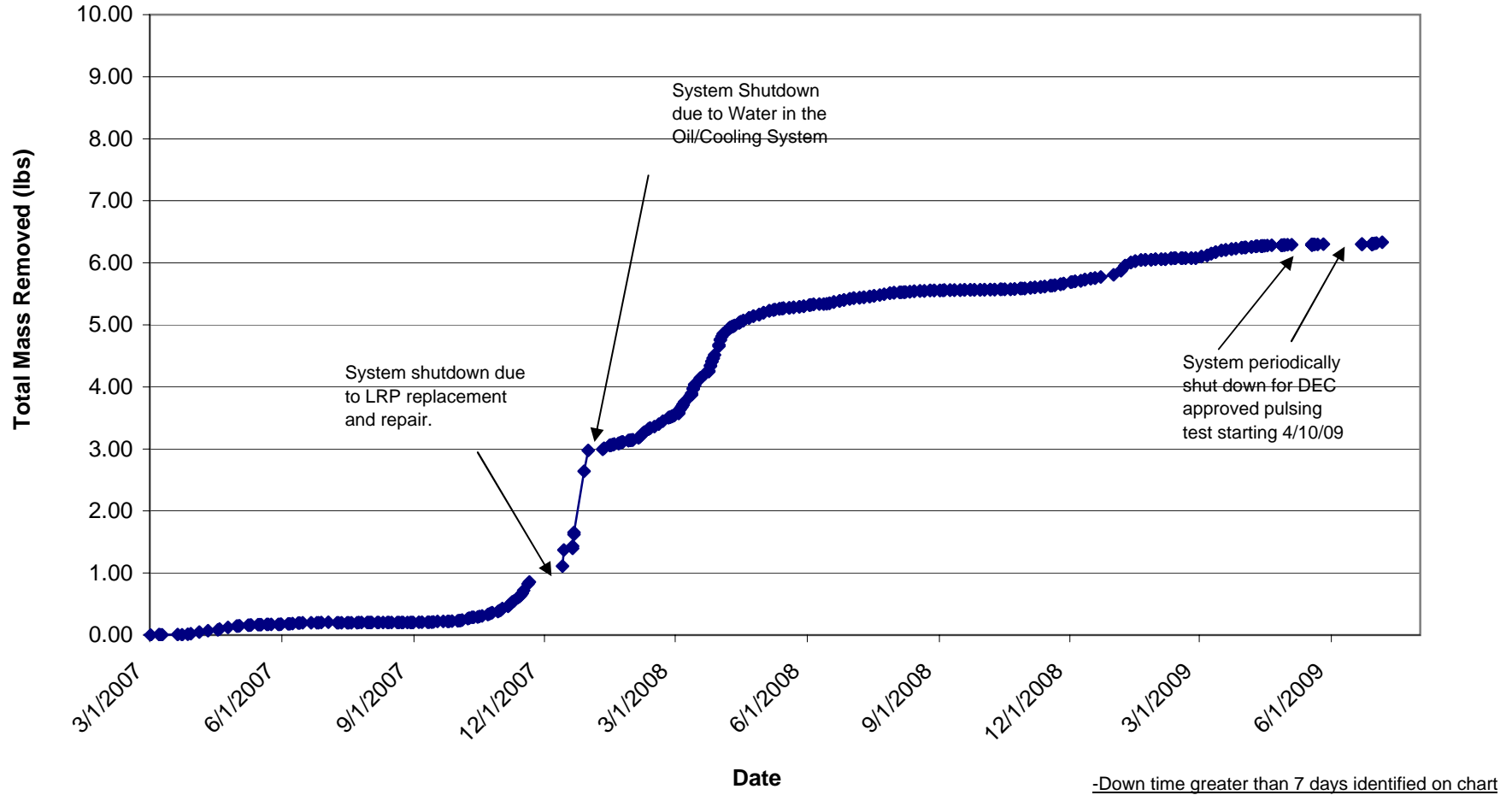
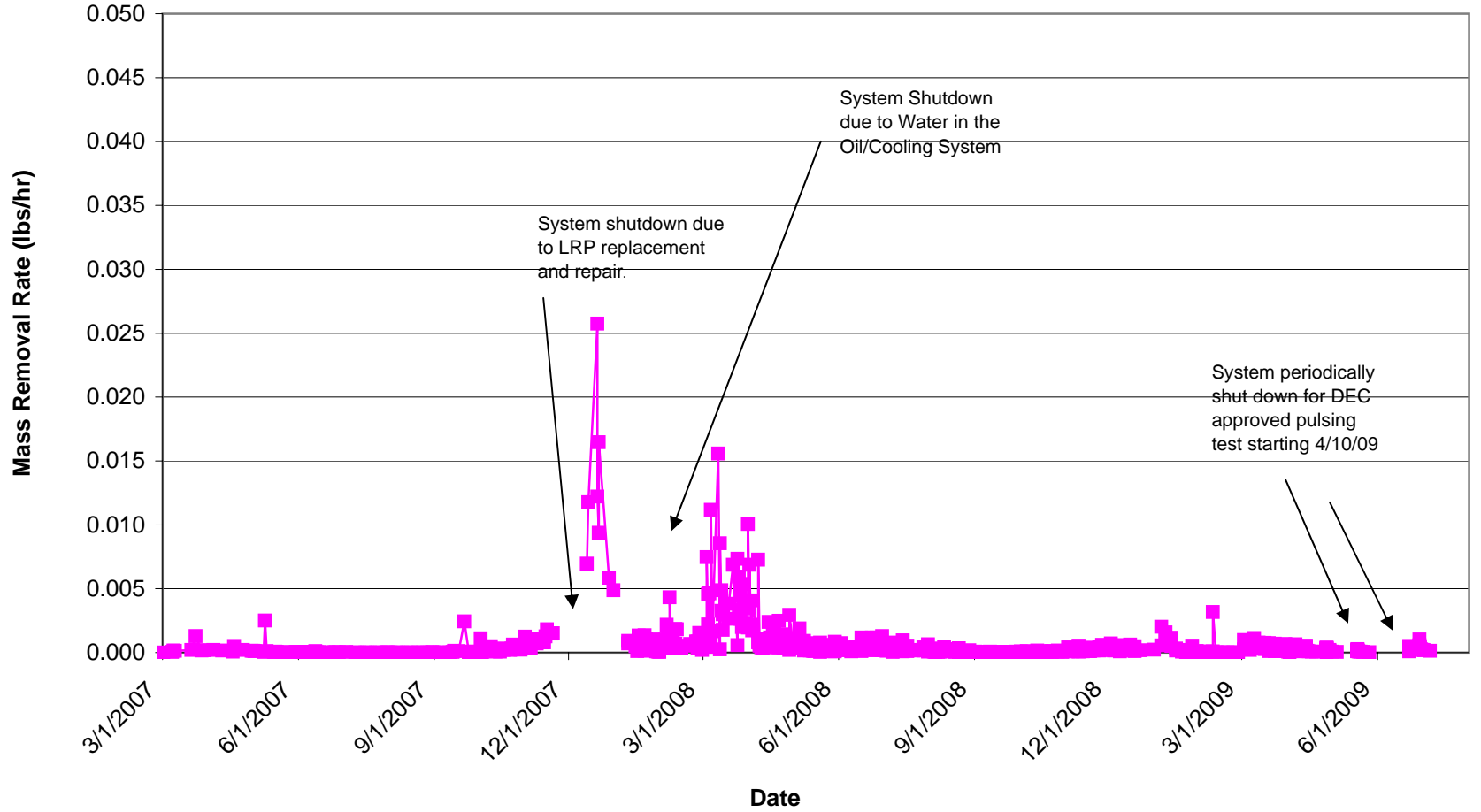


Figure 7

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
July 2009

MeCl Mass Removal Rate (Ground Water)



-Down time greater than 7 days identified on chart

Figure 8

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
July 2009

Cumulative Ground Water Flow

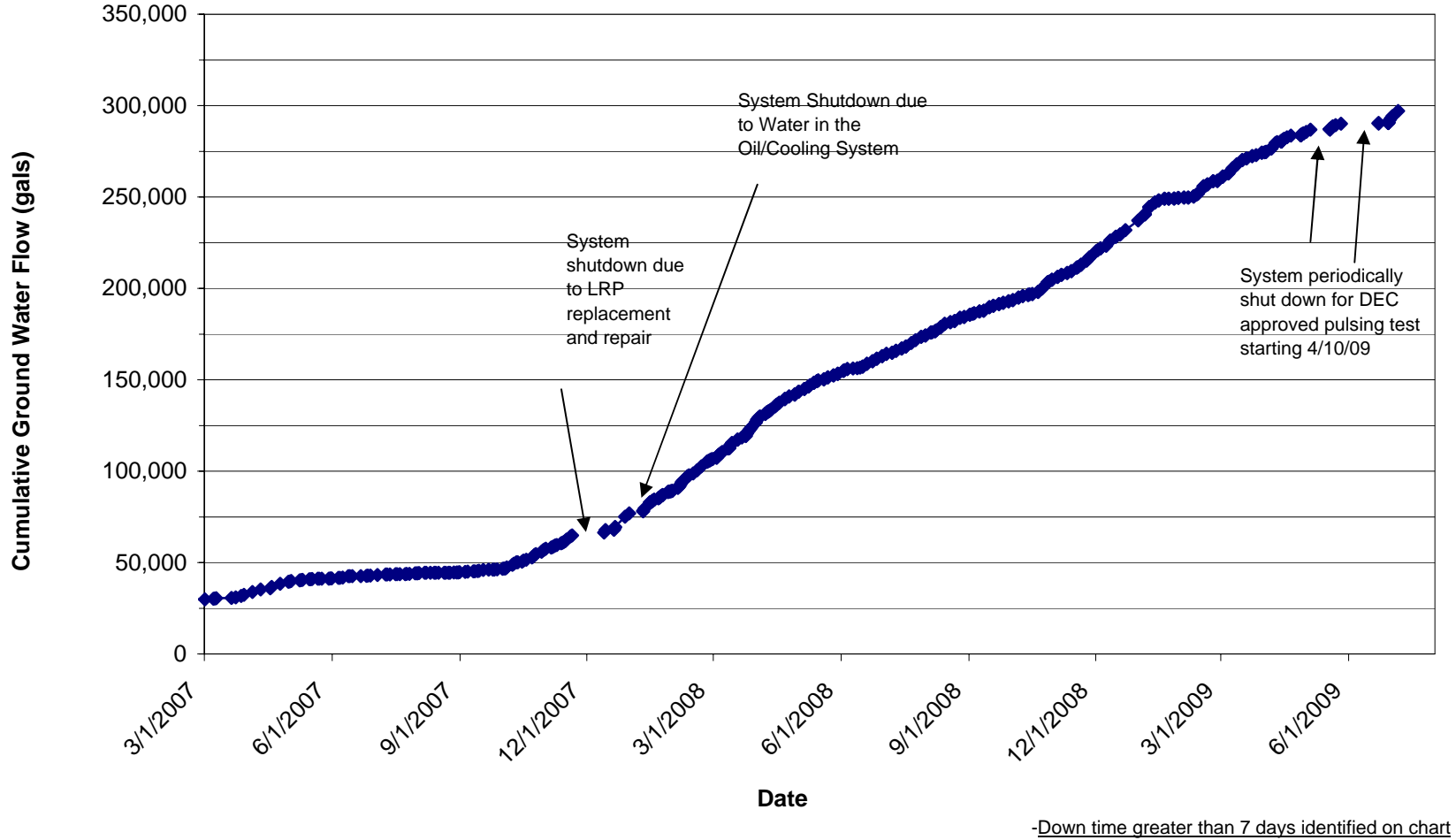
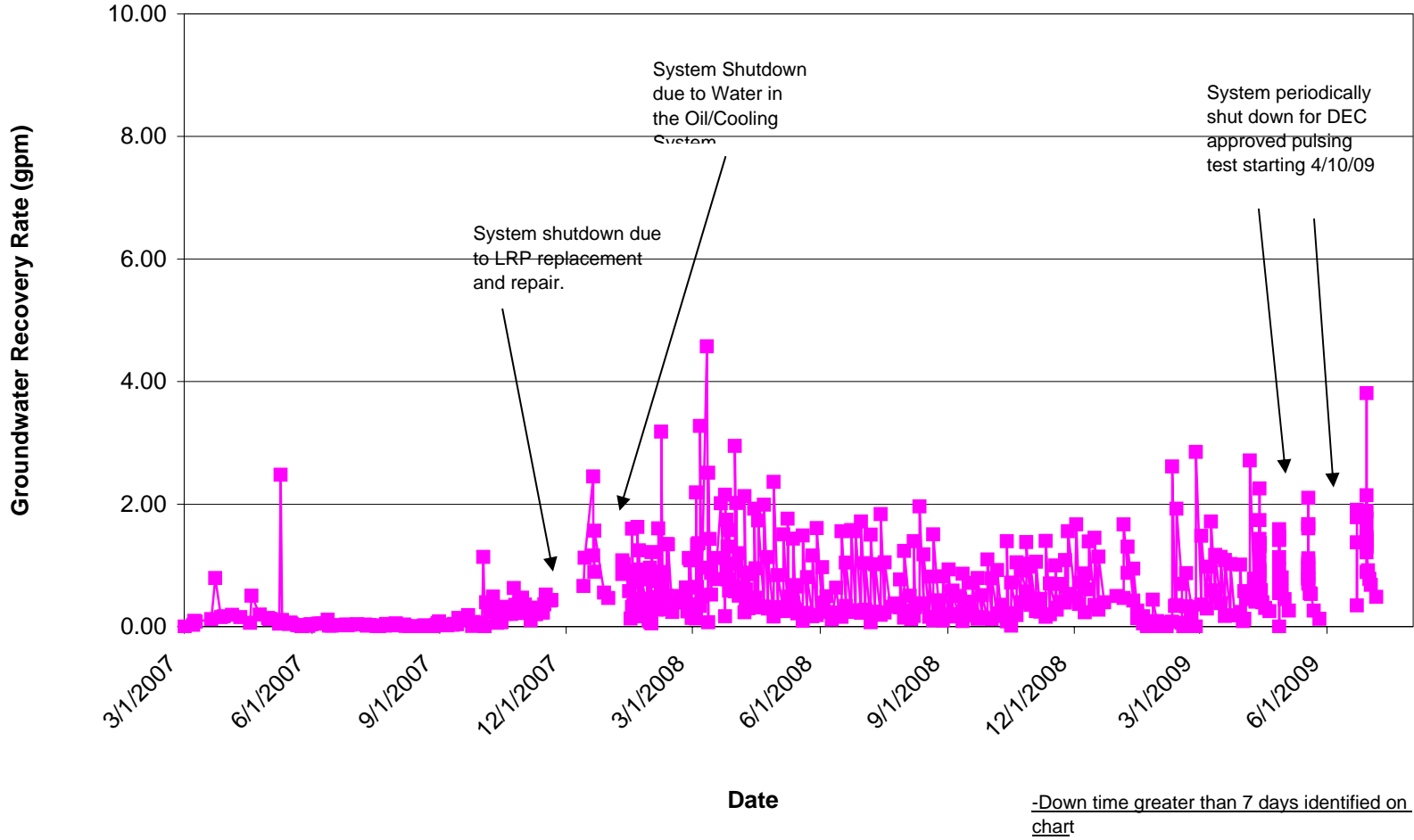


Figure 9

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
July 2009

Ground Water Recovery Rate



Analytical Data



Analytical Report Cover Page

Quantum Management Group

For Lab Project # 09-2306

Issued July 7, 2009

This report contains a total of 3 pages

The reported results relate only to the samples as they have been received by the laboratory.

Any noncompliant QC parameters having impact on the data are flagged or documented on the final report.

All soil/sludge samples have been reported on a dry weight basis, unless qualified "reported as received". Other solids are reported as received.

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The Chain of Custody provides additional information, including compliance with sample condition requirements upon receipt. Sample condition requirements are defined under the 2003 NELAC Standard, sections 5.5.8.3.1 and 5.5.8.3.2.

NYSDOH ELAP does not certify for all parameters. Paradigm Environmental Services or the indicated subcontracted laboratory does hold certification for all analytes where certification is offered by ELAP unless otherwise specified.

Data qualifiers are used, when necessary, to provide additional information about the data. This information may be communicated as a flag or as text at the bottom of the report. Please refer to the following list of frequently used data flags and their meaning:

"ND" = analyzed for but not detected.

"E" = Result has been estimated, calibration limit exceeded.

"D" = Duplicate results outside QC limits. May indicate a non-homogenous matrix.

"M" = Matrix spike recoveries outside QC limits. Matrix bias indicated.

"B" = Method blank contained trace levels of analyte. Refer to included method blank report.



Volatile Analysis Report for Air

Client: **Quantum Management Group**

Client Job Site:	MPRS @ UCB Jefferson Rd	Lab Project Number:	09-2306
		Lab Sample Number:	7430
Client Job Number:	N/A		
Field Location:	MW-08 Tedlar Bag	Date Sampled:	06/29/2009
Field ID Number:	N/A	Date Received:	06/29/2009
Sample Type:	Air	Date Analyzed:	07/07/2009

MW-D8 Vapor Sample

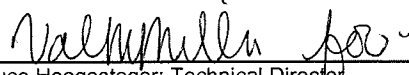
Compound	Results in PPBv	Results in ug / m3
Acetone	ND< 4,220	ND< 10,000
Benzene	ND< 627	ND< 2,000
2-Butanone	ND< 3,400	ND< 10,000
Carbon disulfide	ND< 643	ND< 2,000
Chloroform	ND< 414	ND< 2,000
Chloromethane	ND< 978	ND< 2,000
cis-1,2-Dichloroethene	ND< 509	ND< 2,000
Methylene chloride	2,390	8,210
m,p-Xylene	ND< 461	ND< 2,000
o-Xylene	ND< 461	ND< 2,000

ELAP Number 10958

Method: EPA 8260B
Modified for Tedlar Bag

Data File: V66929.D

Comments: ND denotes Non Detect
PPBv = Parts per Billion volume
ug / m3 - Microgram per cubic meter.

Signature: 
Bruce Hoogesteger: Technical Director



September 9, 2009

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: Monthly Progress Report – August 2009
755 Jefferson Road Facility – Henrietta, New York
NYSDEC VCP Number V00126-8

***Key Actions
This Period:***

- **August 1 – August 31, 2009.** The system was operated intermittently in accordance with the planned NYSDEC approved pulsing activities.

Operations Metrics (August 3 – August 10)

- Operational Time: 175 out of a scheduled 175 hours of operation.
- Uptime Efficiency: 100%
- Volume of Groundwater Treated: 4,242 gallons.
 - Discharged to: The sanitary sewer system.
- Total estimated VOC mass recovered to date: 137.4 lbs.
- Total estimated VOC mass recovered during August: 0.18 lbs.
- Mean estimated VOC mass removal rate for August 2009 versus July 2009: 0.0001 versus 0.0001 lbs/hr (Rate remained the same).
- General weather conditions: Average precipitation and cool temperatures as compared to historical data.

Tables, Figures and Graphs

- Table 1: August Treated Waste Water Flow/Vapor Monitoring Data.
- Table 2: August Recovery Well Rotation Data.
- Figures 1-9: Remedial Effectiveness and Efficiency Platform (REEP) graphs
- Figures 2A and 3A: Selected Remedial Effectiveness and Efficiency Platform (REEP) graphs showing results from March 1, 2008 to present.

***Problems/
Resolutions:***

- None

***Analytical Data
Received:***

- The August 2009 vapor and MPRS influent samples.

***Documents
Submitted:***

- Monthly Progress Report for July 2009 dated August 11, 2009.

**Anticipated
Actions –
August
2009:**

- Continue NYSDEC approved pulsing program until permission is granted to terminate system operation.
- Continue drafting the Post Remedial Construction FER and Certification, as well as a Closure Request.

Comments:

- The attached REEP information is to be utilized as a subjective representation of the overall effectiveness/performance of the system as we are using discontinuous data and PID measurements for the removal calculations. We do not intend this tool as a definitive summary of recovered mass.
- MPRS operation and efficiency, inclusive of the replacement LRP pump and associated upgrades and maintenance, will continue to be monitored.

**NYSDEC-
Approved Field
Decisions:**

- Continuation of pulsing of MPRS system in accordance with the procedure presented to NYSDEC.

If you have any questions regarding this monthly report or progress on the project, please don't hesitate to contact me at 513-314-7543 or rbethel@qmg-inc.com.

Sincerely,
QUANTUM MANAGEMENT GROUP, INC.



Rick Bethel
Senior Associate

Attachments

cc:

Mr. Jeffrey M. Kosmala, P.E. (MCDOH)
Mr. Michael Bogdan (Sanofi-Aventis)
Mr. Kevin Bruno (RFBC Law)
Mr. Mark Byrne, P.E. (Town of Henrietta)
Ms. Libby Ford, (Nixon Peabody)
Mr. Joseph Hausbeck, Esq. (NYSDEC)
Mr. George Hollerbach, P.E. (Quantum)

Ms. Melissa Menetti (NYSDOH)
Mr. David Panipinto (UCB)
Mr. Bart Putzig, P.E. (NYSDEC)
Mr. Sean Keenan (MCDES)
Mr. John Lang, P.E. (Quantum)
Mr. Greg Light (UCB)

Tables

TABLE 1 - TREATED WASTE WATER FLOW/VAPOR MONITORING DATA
MCA REMEDIATION SYSTEM
755 JEFFERSON ROAD, HENRIETTA, NEW YORK
NYSDEC VCP NUMBER V00126-8
August 2009

Date	Time ¹	Cumulative Hours ²	Total Flow ³ Gallons	Flow Rate ⁴ Gal/Min	Cumulative Gallons ^{5,6}	Influent PID (ppm)	Effluent PID (ppm)
7/6/2009	9:06	38732.6	2,680	0.5	297,001	0.9	0.0
8/3/2009	9:55	38735.0	248	1.7	297,249	0.3	0.0
8/3/2009	12:36	38737.0	406	3.5	297,655	0	0.0
8/5/2009	13:17	38785.7	2,037	0.7	299,692	1.2	0.0
8/5/2009	15:01	38787.4	117	1.1	299,809	0.3	0.0
8/7/2009	8:43	38829.1	559	0.2	300,368	1.3	0.0
8/7/2009	10:46	38831.1	89	0.7	300,457	0.8	0.0
8/10/2009	12:58	38905.4	707	0.2	301,164	0.3	0.0
8/10/2009	14:45	38907.1	79	0.7	301,243	0	0.0

¹Time of day (in military time) data was collected.

²Cumulative Hours represents the number of run-hours since MCA remediation system start-up on 12 July 2006.

³Total Flow in Gallons represents the flow that occurred since the time the last measurement was collected, as indicated in the previous row of the table.

⁴Flow Rate in Gallons/Minute represents the average flow rate since the time the last measurement was collected, as indicated in the previous row of the table.

⁵Cumulative Gallons represents the number of gallons of water treated by the MCA remediation system since start-up on 12 July 2006.

⁶Totalizer Flow readings collected from newly installed totalizer beginning October 2, 2007.

⁷n/a: data not available

TABLE 2 - RECOVERY WELL ROTATION DATA
MCA REMEDIATION SYSTEM
755 JEFFERSON ROAD, HENRIETTA, NEW YORK
NYSDEC VCP NUMBER V00126-8
August 2009

Date	Well Rotation Clusters								
	EXSB-2	MW-D8	MW -21	MW-22	MW-20A	MW-20B	RW-6	RW-5	RW-4
August 1-2	System shut down as part of NYSDEC approved pulsing program								
August 3-10		X						X	X
August 11-31	System shut down as part of NYSDEC approved pulsing program								

Figures

Figure 1

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
August 2009

Total VOC Mass Removed (Vapor and Ground Water Combined)

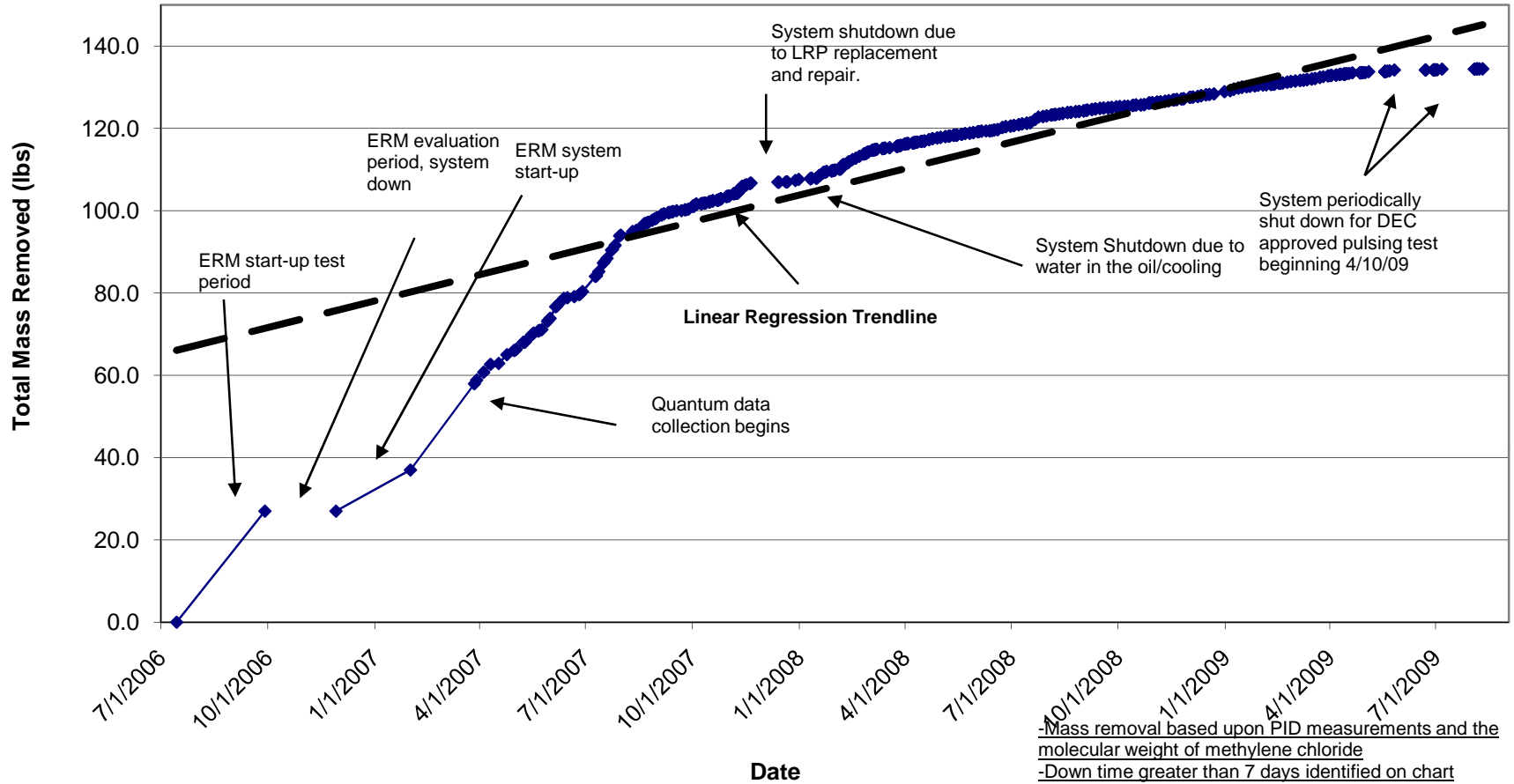


Figure 2
MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
August 2009

Total VOC Mass Removal Rate (Vapor & Ground Water Combined)

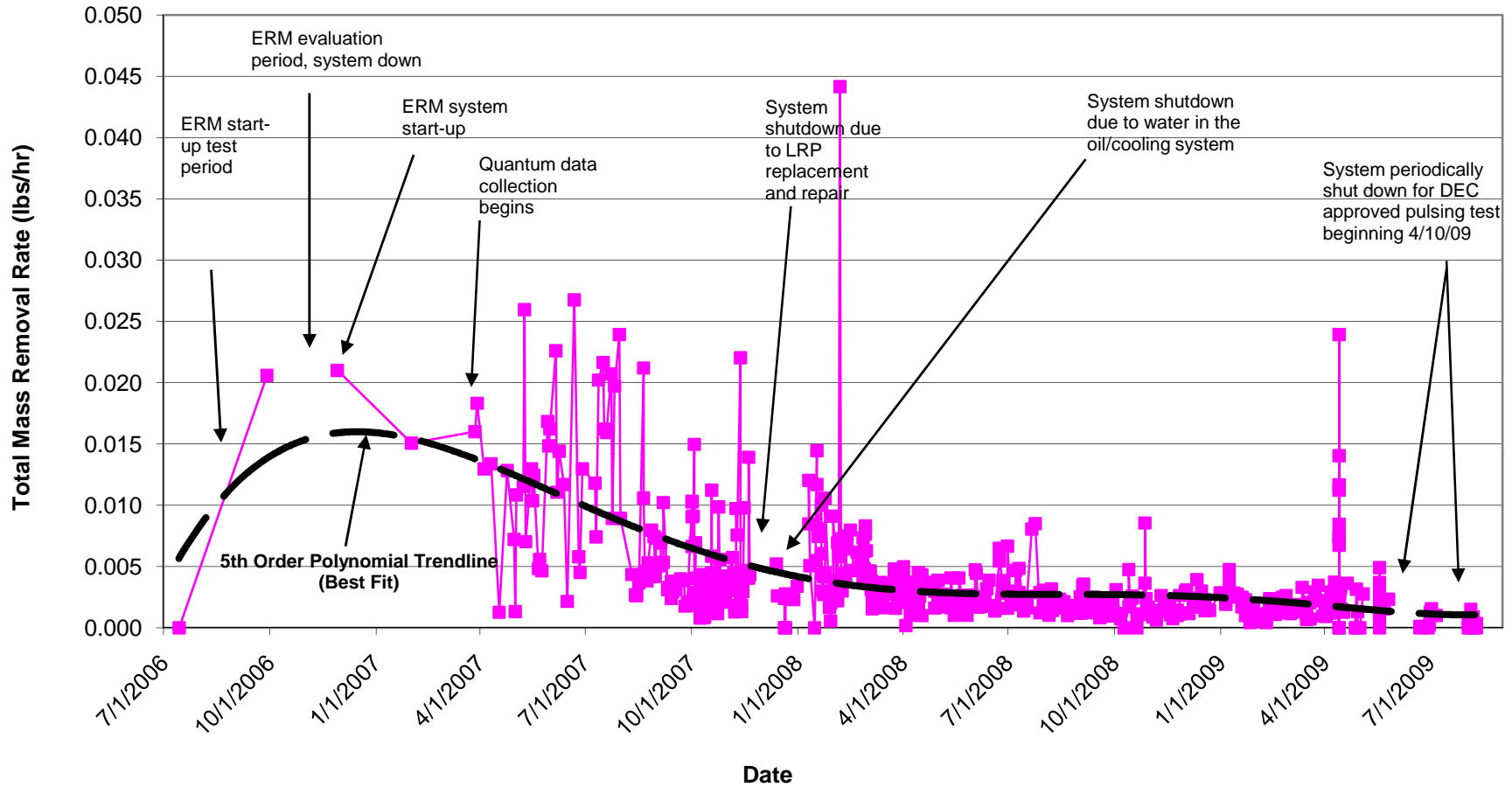


Figure 2A

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
August 2009

Total VOC Mass Removal Rate (Vapor & Ground Water Combined) Since March 2008

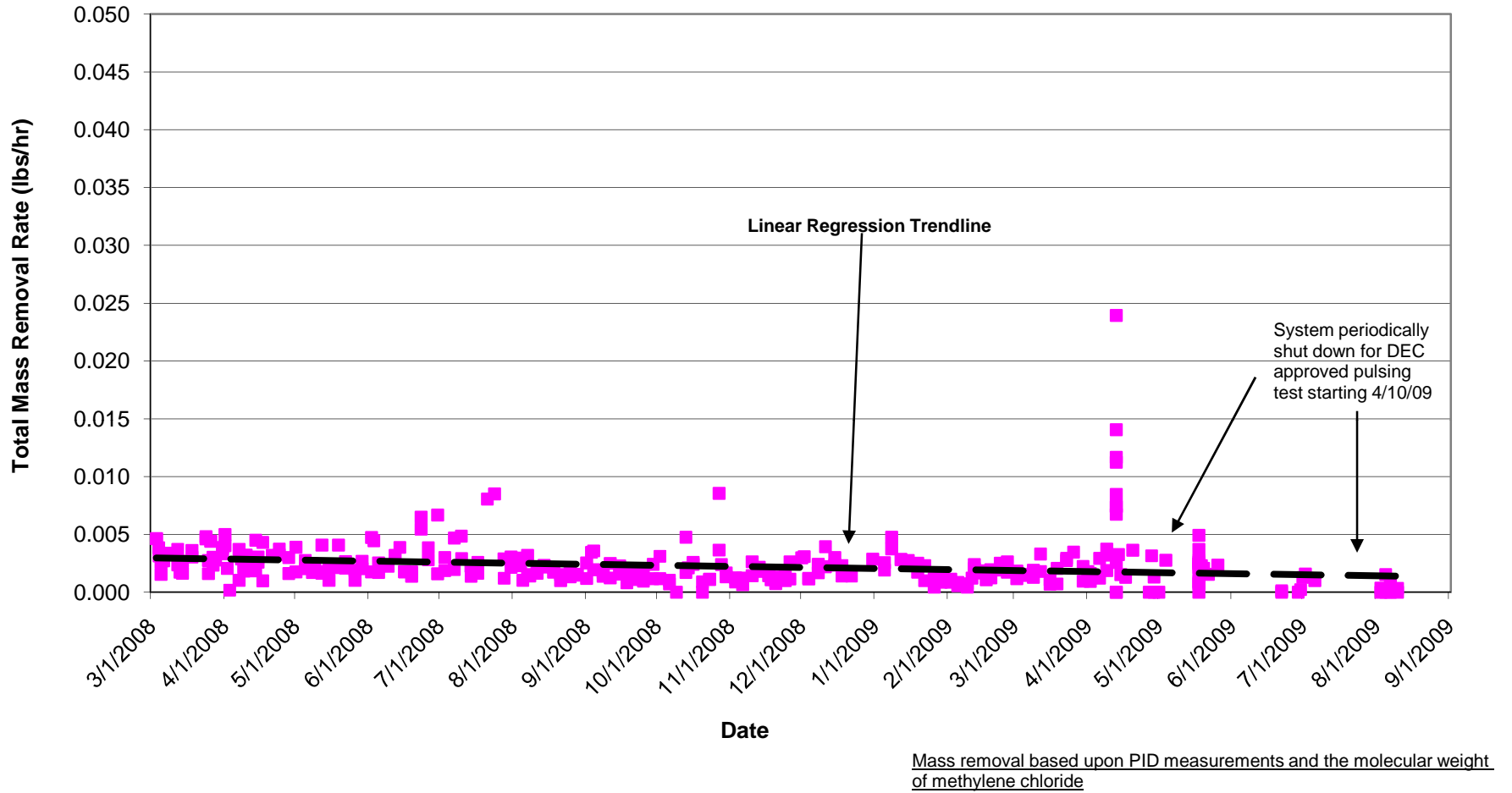
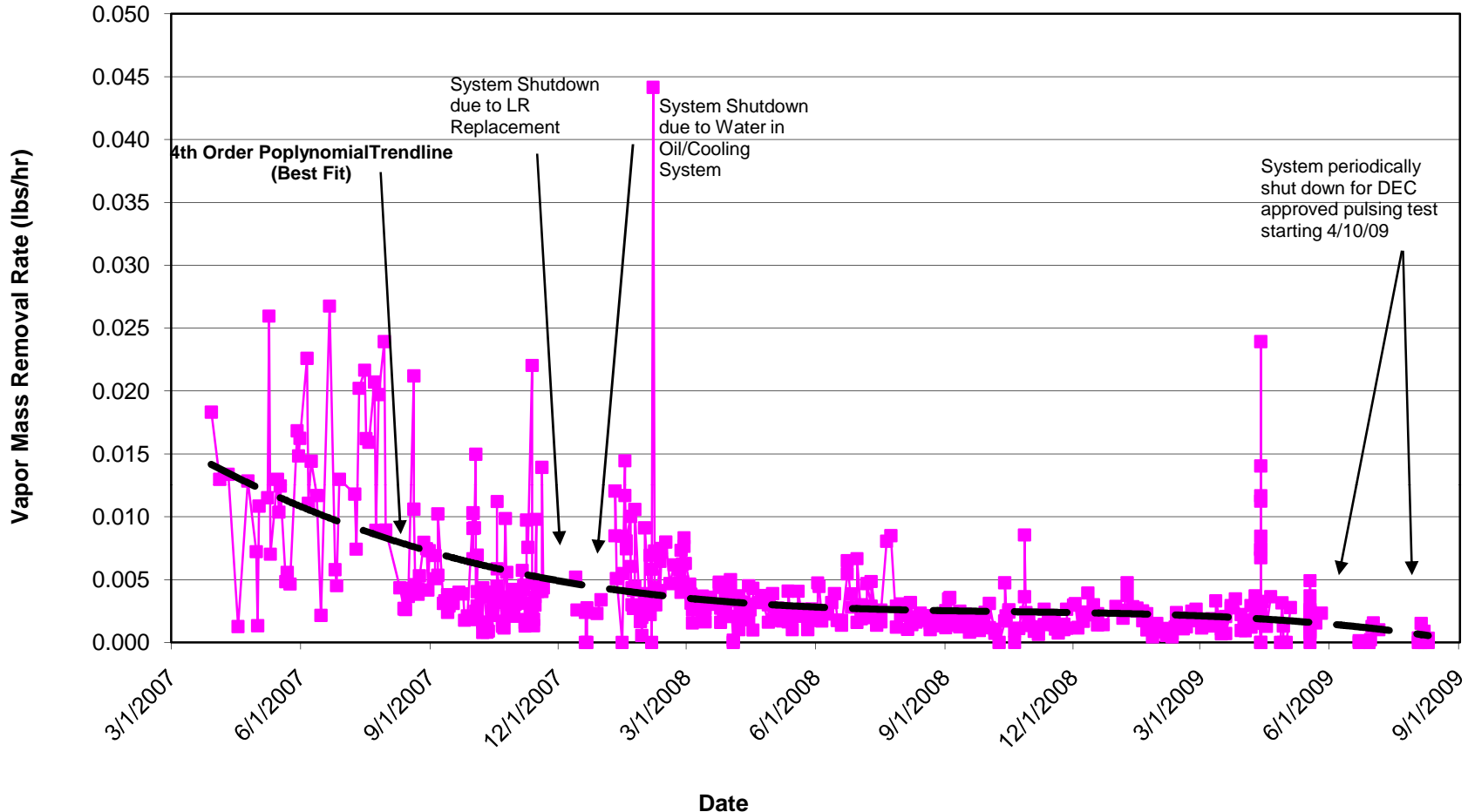


Figure 3
MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
August 2009

Vapor Mass Removal Rate



-Down time greater than 7 days identified on chart

Figure 3A

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
August 2009

Vapor Mass Removal Rate Since March 2008

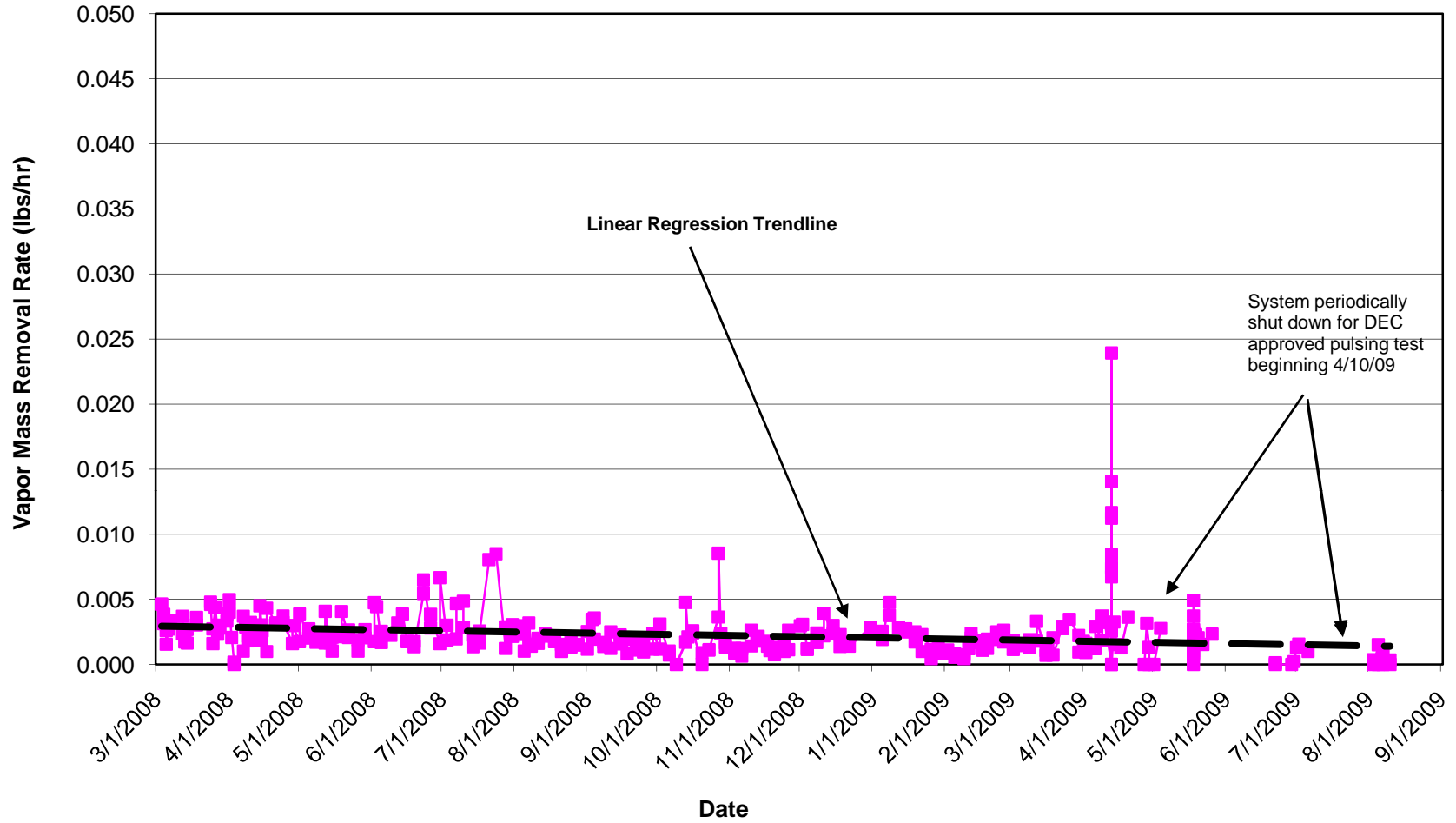
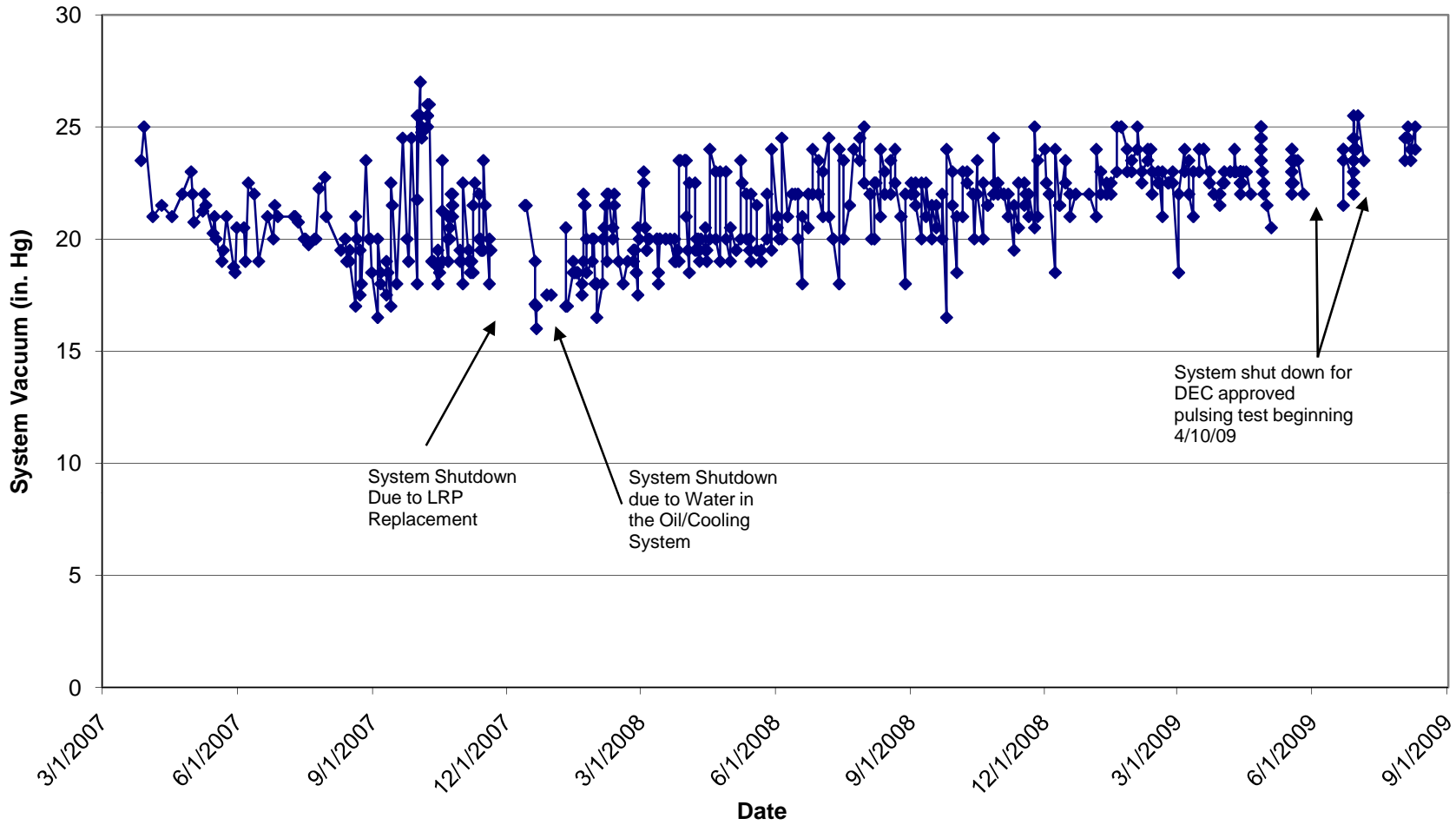


Figure 4

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
August 2009

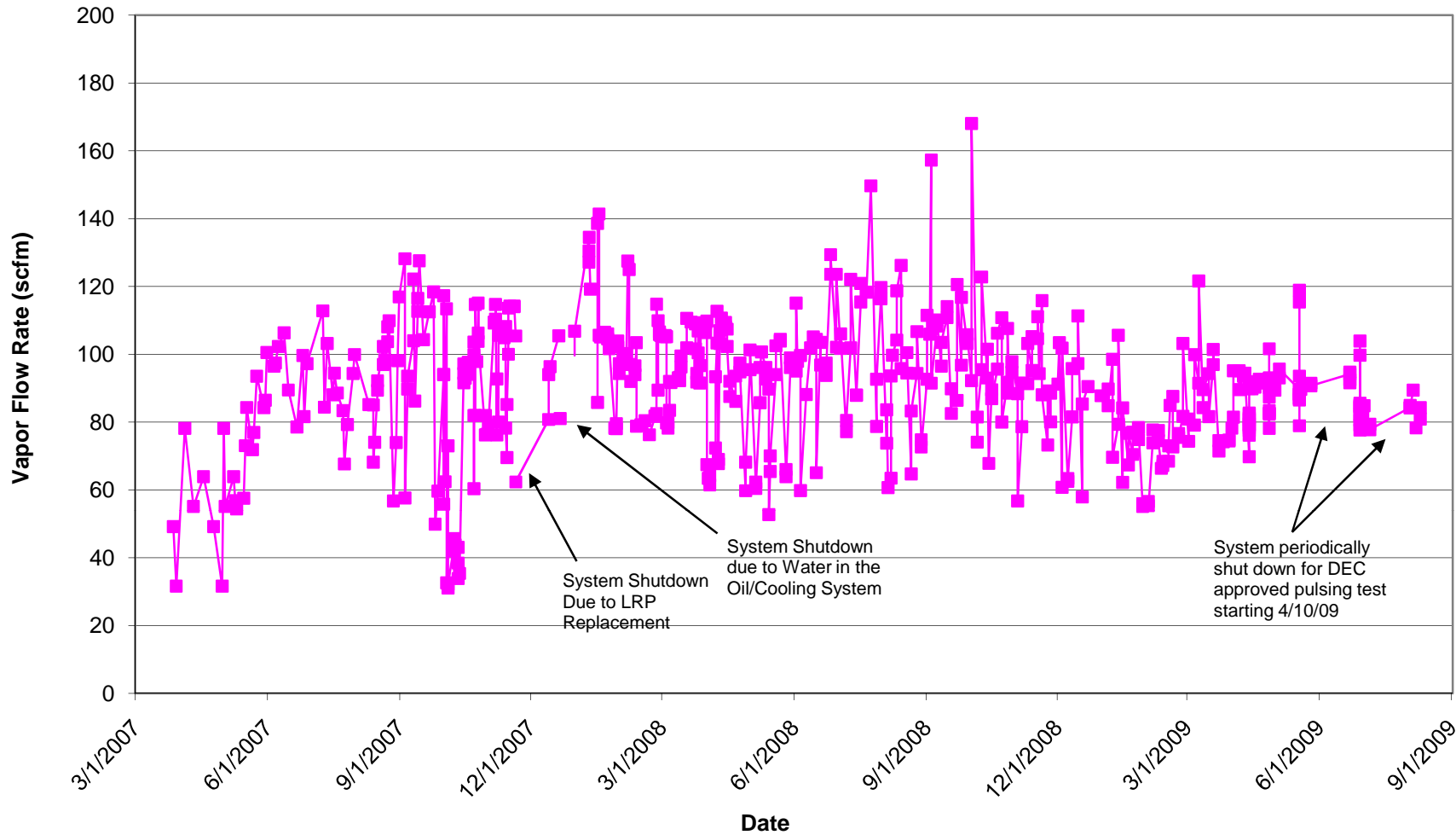
System Vacuum



-Down time greater than 7 days identified on chart

Figure 5
MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
August 2009

System Vapor Flow Rate



-Down time greater than 7 days identified on chart

Figure 6

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
August 2009

Total MeCl Mass Removed (Ground Water)

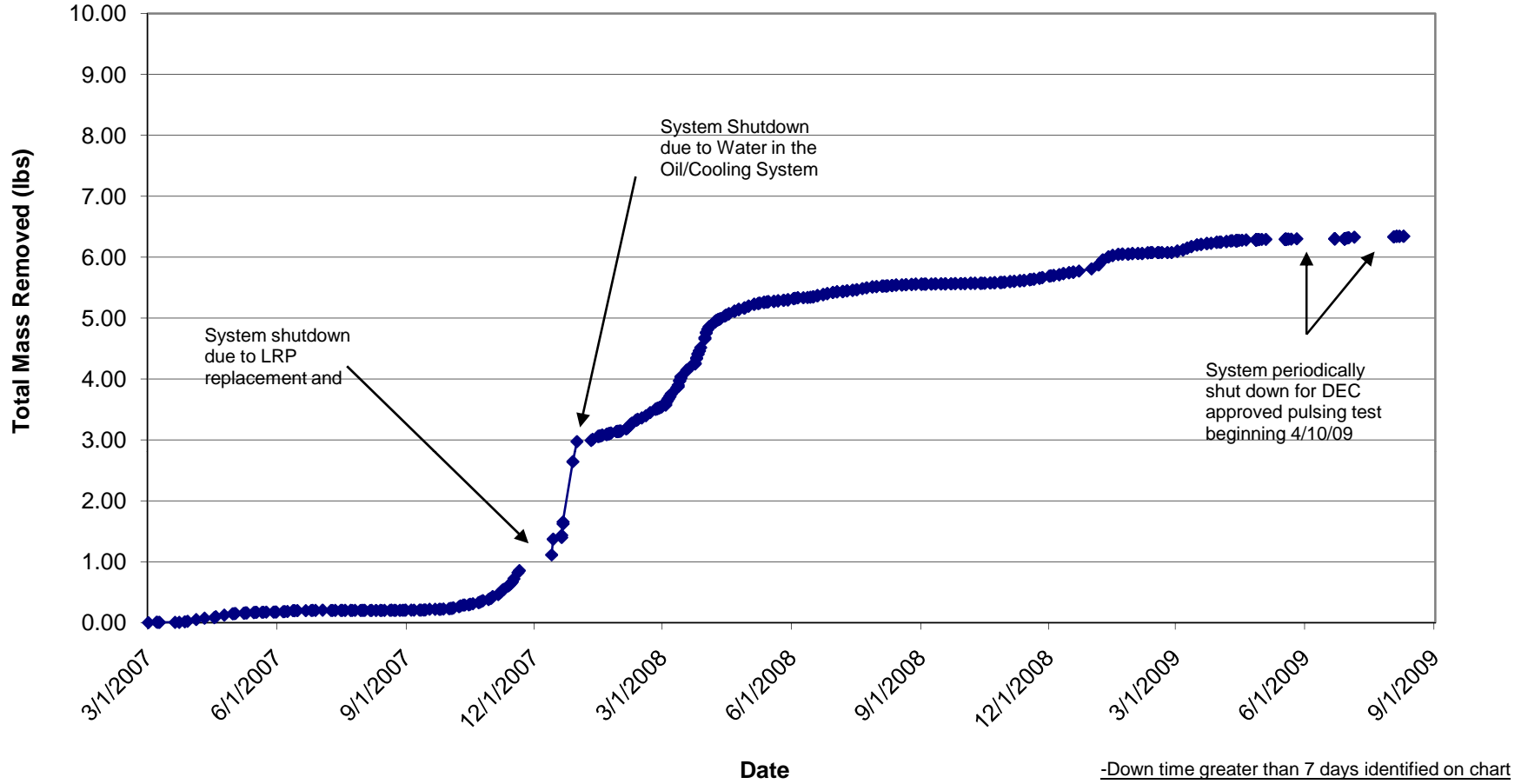
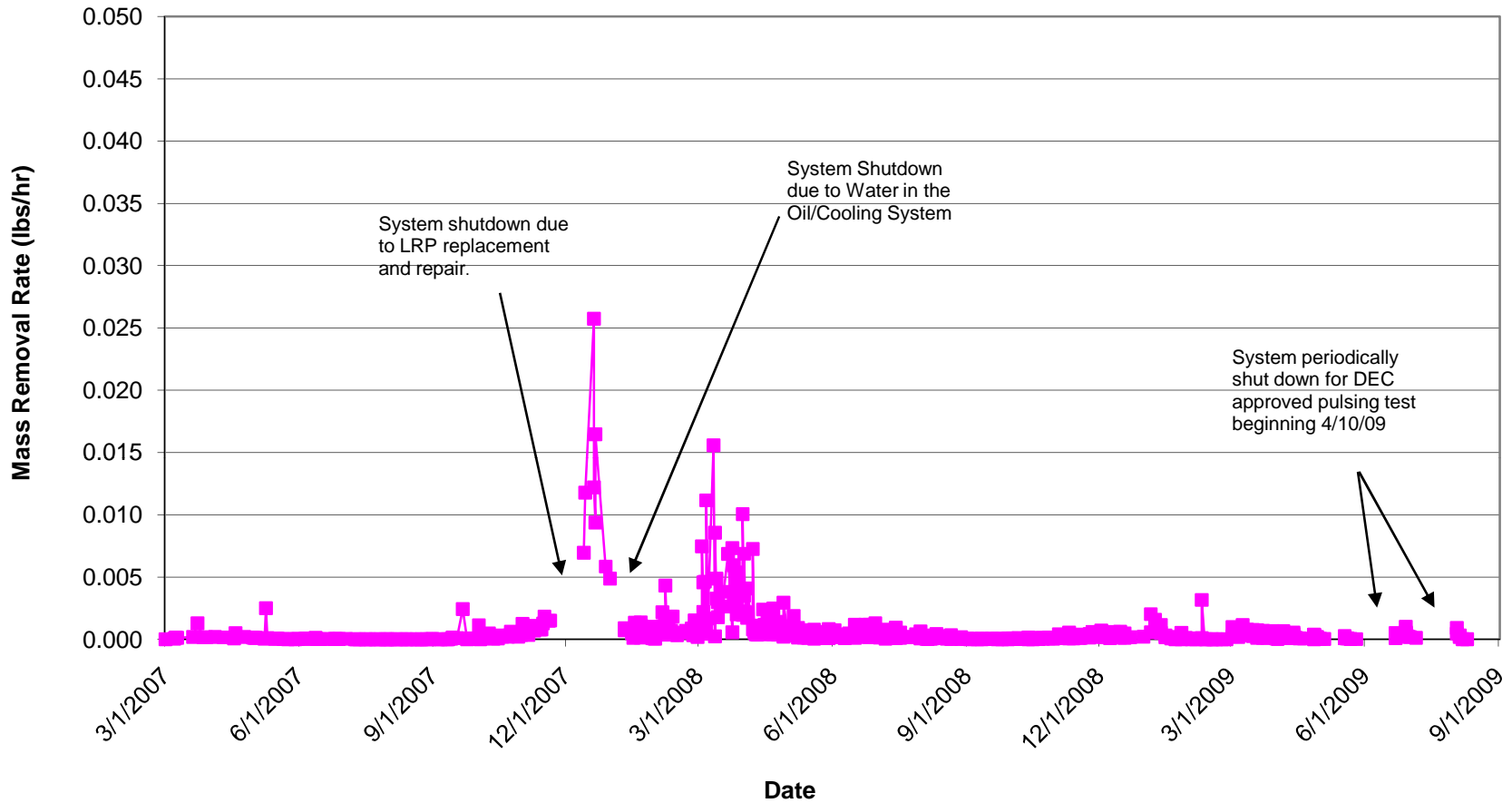


Figure 7
MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
August 2009

MeCl Mass Removal Rate (Ground Water)



-Down time greater than 7 days identified on chart

Figure 8

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
August 2009

Cumulative Ground Water Flow

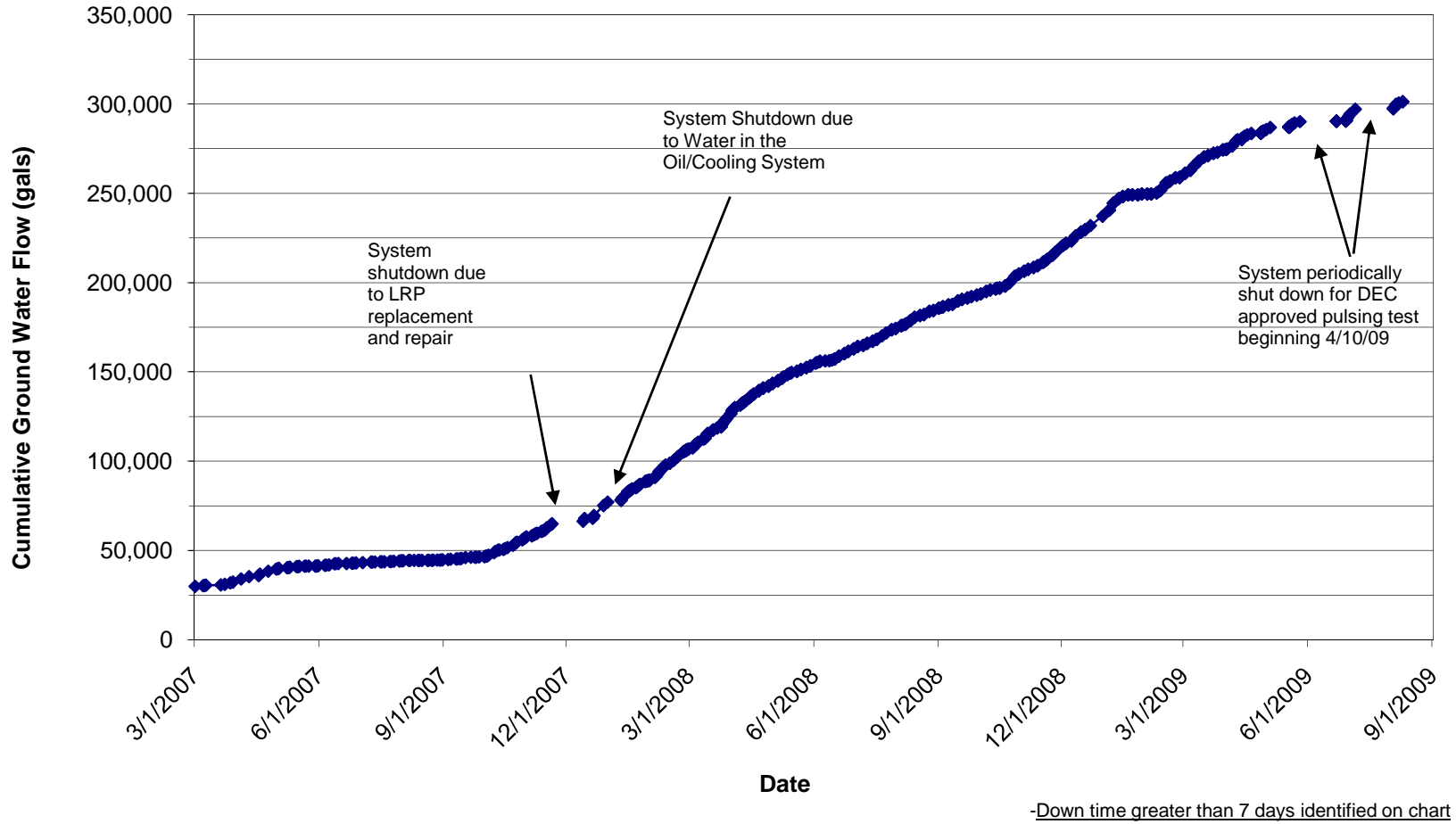
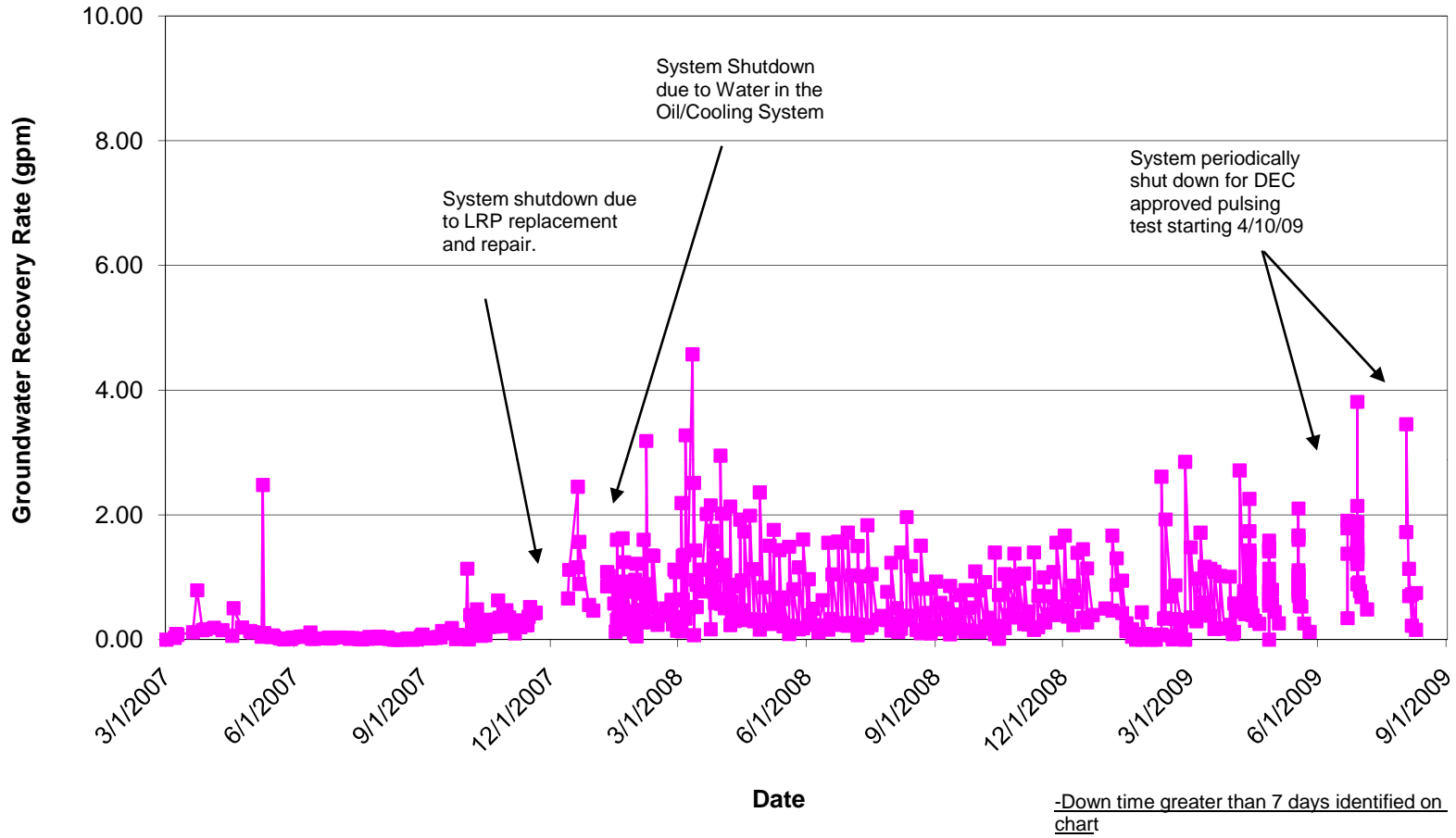


Figure 9

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
August 2009

Ground Water Recovery Rate



Analytical Data



PARADIGM
ENVIRONMENTAL SERVICES, INC.

Analytical Report Cover Page

Quantum Management Group

For Lab Project # 09-2888

Issued August 14, 2009

This report contains a total of 4 pages

The reported results relate only to the samples as they have been received by the laboratory.

Any noncompliant QC parameters having impact on the data are flagged or documented on the final report.

All soil/sludge samples have been reported on a dry weight basis, unless qualified "reported as received". Other solids are reported as received.

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The Chain of Custody provides additional information, including compliance with sample condition requirements upon receipt. Sample condition requirements are defined under the 2003 NELAC Standard, sections 5.5.8.3.1 and 5.5.8.3.2.

NYSDOH ELAP does not certify for all parameters. Paradigm Environmental Services or the indicated subcontracted laboratory does hold certification for all analytes where certification is offered by ELAP unless otherwise specified.

Data qualifiers are used, when necessary, to provide additional information about the data. This information may be communicated as a flag or as text at the bottom of the report. Please refer to the following list of frequently used data flags and their meaning:

"ND" = analyzed for but not detected.

"E" = Result has been estimated, calibration limit exceeded.

"D" = Duplicate results outside QC limits. May indicate a non-homogenous matrix.

"M" = Matrix spike recoveries outside QC limits. Matrix bias indicated.

"B" = Method blank contained trace levels of analyte. Refer to included method blank report.

Volatile Analysis Report for Water

Client: Quantum Management Group

Client Job Site:	MPRS @ UCB Jefferson Rd	Lab Project Number:	09-2888
Client Job Number:	N/A	Lab Sample Number:	9189
Field Location:	PreBT / Inf 1,2,3 Comp	Date Sampled:	08/07/2009
Field ID Number:	N/A	Date Received:	08/07/2009
Sample Type:	Water	Date Analyzed:	08/14/2009

Liquid Influent

Compounds	Results in ug / L
Acetone	74.3
Amyl Acetate	ND< 125
Benzene	ND< 3.50
2-Butanone	ND< 50.0
Carbon disulfide	ND< 25.0
Chloroform	ND< 10.0
Chloromethane	ND< 10.0
cis-1,2-Dichloroethene	ND< 10.0
Ethyl acetate	ND< 125
Isopropyl acetate	ND< 125
Methylene chloride	50.7
m,p-Xylene	ND< 10.0
o-Xylene	ND< 10.0


ELAP Number 10958

Method: EPA 624

Data File: V68014.D

Comments: ND denotes Non Detect
ug / L = microgram per Liter

Signature: _____


Bruce Hoogesteger: Technical Director

**Volatile Analysis Report for Air**Client: **Quantum Management Group**

Client Job Site:	MPRS @ UCB Jefferson Rd	Lab Project Number:	09-2888
Client Job Number:	N/A	Lab Sample Number:	9190
Field Location:	SP-102 Tedlar Bag	Date Sampled:	08/07/2009
Field ID Number:	N/A	Date Received:	08/07/2009
Sample Type:	Air	Date Analyzed:	08/14/2009

Vapor Influent

Compound	Results in PPBv	Results in ug / m3
Acetone	ND< 4,220	ND< 10,000
Benzene	ND< 627	ND< 2,000
2-Butanone	ND< 3,400	ND< 10,000
Carbon disulfide	ND< 643	ND< 2,000
Chloroform	ND< 414	ND< 2,000
Chloromethane	ND< 978	ND< 2,000
cis-1,2-Dichloroethene	ND< 509	ND< 2,000
Methylene chloride	1,810	6,220
m,p-Xylene	ND< 461	ND< 2,000
o-Xylene	ND< 461	ND< 2,000

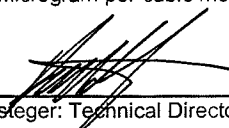
ELAP Number 10958

Method: EPA 8260B
Modified for Tedlar Bag

Data File: V68016.D

Comments: ND denotes Non Detect
 PPBv = Parts per Billion volume
 ug / m3 - Microgram per cubic meter.

Signature: _____


 Bruce Hoogesteger: Technical Director



October 9, 2009

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: Monthly Progress Report – September 2009
755 Jefferson Road Facility – Henrietta, New York
NYSDEC VCP Number V00126-8

***Key Actions
This Period:***

- **September 1 – September 30, 2009.** The system was intermittently operational in accordance with the NYSDEC approved pulsing activities.

Operations Metrics (September 9 – September 15)

- Operational Time: 168 out of a scheduled 168 hours of operation.
- Uptime Efficiency: 100%
- Volume of Groundwater Treated: 3,119 gallons.
 - Discharged to: The sanitary sewer system.
- Total estimated VOC mass recovered to date: 137.6 lbs.
- Total estimated VOC mass recovered during September: 0.26 lbs.
- Mean estimated VOC mass removal rate for September 2009 versus August 2009: 0.0018 versus 0.0001 lbs/hr.
- General weather conditions: Less than average precipitation and cool temperatures as compared to historical data.

Tables, Figures and Graphs

- Table 1: September Treated Waste Water Flow/Vapor Monitoring Data.
- Table 2: September Recovery Well Rotation Data.
- Figures 1-9: Remedial Effectiveness and Efficiency Platform (REEP) graphs
- Figures 2A and 3A: Selected Remedial Effectiveness and Efficiency Platform (REEP) graphs showing results from March 1, 2008 to present.

***Problems/
Resolutions:***

- None

***Analytical Data
Received:***

- The September 2009 influent vapor sample and the MPRS influent and effluent samples.

***Documents
Submitted:***

- Monthly Progress Report for August 2009 dated September 10, 2009.

**Anticipated
Actions –
October
2009:**

- Continue NYSDEC approved pulsing program until permission is granted to terminate system operation.
- Submittal of the Post Remedial Construction OM&M, FER, Closure Request and Certification and revised Site Management Plan.

Comments:

- The attached REEP information is to be utilized as a subjective representation of the overall effectiveness/performance of the system as we are using discontinuous data and PID measurements for the removal calculations. We do not intend this tool as a definitive summary of recovered mass.
- MPRS operation and efficiency, inclusive of the replacement LRP pump and associated upgrades and maintenance, will continue to be monitored.

**NYSDEC-
Approved Field
Decisions:**

- Continuation of pulsing of MPRS system in accordance with the procedure presented to NYSDEC.

If you have any questions regarding this monthly report or progress on the project, please don't hesitate to contact me at 513-314-7543 or rbethel@qmg-inc.com.

Sincerely,
QUANTUM MANAGEMENT GROUP, INC.



Rick Bethel
Senior Associate

Attachments

cc:

Mr. Jeffrey M. Kosmala, P.E. (MCDOH)
Mr. Michael Bogdan (Sanofi-Aventis)
Mr. Kevin Bruno (RFBC Law)
Mr. Mark Byrne, P.E. (Town of Henrietta)
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Ms. Melissa Menetti (NYSDOH)
Mr. David Panipinto (UCB)
Mr. Bart Putzig, P.E. (NYSDEC)
Mr. Sean Keenan (MCDES)
Mr. John Lang, P.E. (Quantum)
Mr. Greg Light (UCB)

Tables

TABLE 1 - TREATED WASTE WATER FLOW/VAPOR MONITORING DATA
MCA REMEDIATION SYSTEM
755 JEFFERSON ROAD, HENRIETTA, NEW YORK
NYSDEC VCP NUMBER V00126-8
September 2009

Date	Time ¹	Cumulative Hours ²	Total Flow ³ Gallons	Flow Rate ⁴ Gal/Min	Cumulative Gallons ^{5,6}	Influent PID (ppm)	Effluent PID (ppm)
8/10/2009	2:45	38907.1	79	0.7	301,243	0.0	0.0
9/9/2009	10:24	38907.5	45	1.9	301,288	0.5	0.2
9/9/2009	12:06	38909.2	189	1.8	301,477	0.0	0.0
9/11/2009	9:15	38954.4	1,170	0.4	302,647	2.2	0.5
9/11/2009	11:26	38956.6	151	1.2	302,798	0.5	0.0
9/14/2009	9:18	39026.5	1,134	0.3	303,932	1.2	0.3
9/14/2009	11:20	39028.5	104	0.9	304,036	0.3	0.0
9/15/2009	9:08	39050.3	213	0.2	304,249	1.0	0.0
9/15/2009	11:01	39052.1	113	1.0	304,362	0.6	0.0
9/16/2009	9:45	39074.9	n/a ⁷	n/a ⁷	n/a ⁷	n/a ⁷	n/a ⁷

¹Time of day (in military time) data was collected.

²Cumulative Hours represents the number of run-hours since MCA remediation system start-up on 12 July 2006.

³Total Flow in Gallons represents the flow that occurred since the time the last measurement was collected, as indicated in the previous row of the table.

⁴Flow Rate in Gallons/Minute represents the average flow rate since the time the last measurement was collected, as indicated in the previous row of the table.

⁵Cumulative Gallons represents the number of gallons of water treated by the MCA remediation system since start-up on 12 July 2006.

⁶Totalizer Flow readings collected from newly installed totalizer beginning October 2, 2007.

⁷n/a: data not available, Kleinfelder personnel on site was present for GWS only and was not trained to safely operate the system/collect data.

TABLE 2 - RECOVERY WELL ROTATION DATA
MCA REMEDIATION SYSTEM
755 JEFFERSON ROAD, HENRIETTA, NEW YORK
NYSDEC VCP NUMBER V00126-8
September 2009

Date	Well Rotation Clusters								
	EXSB-2	MW-D8	MW -21	MW-22	MW-20A	MW-20B	RW-6	RW-5	RW-4
September 1-8	System shut down as part of NYSDEC approved pulsing program								
September 9-16		X						X	X
September 17-30	System shut down as part of NYSDEC approved pulsing program								

Figures

Figure 1
MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
September 2009

Total VOC Mass Removed (Vapor and Ground Water Combined)

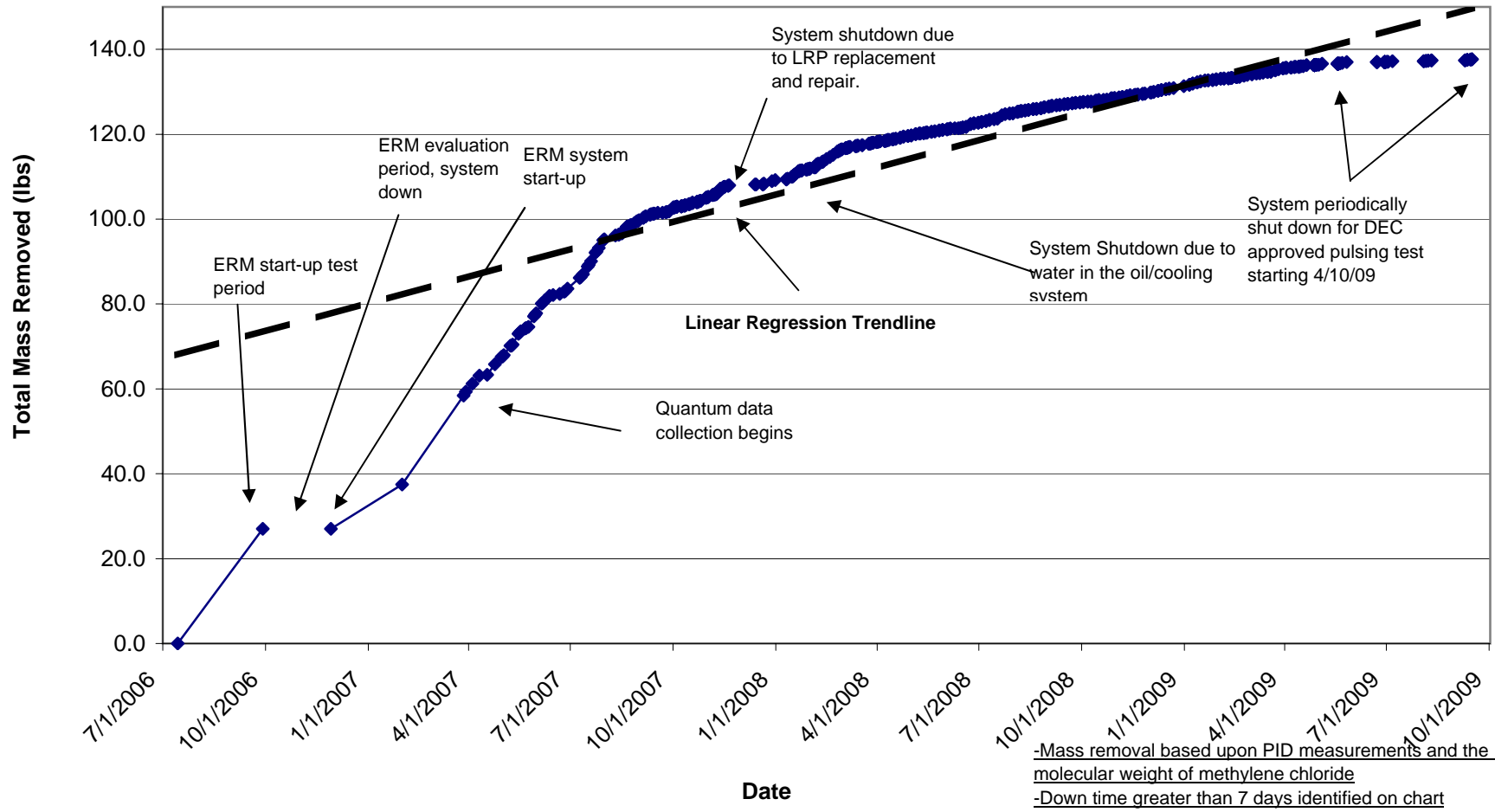


Figure 2

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
September 2009

Total VOC Mass Removal Rate (Vapor & Ground Water Combined)

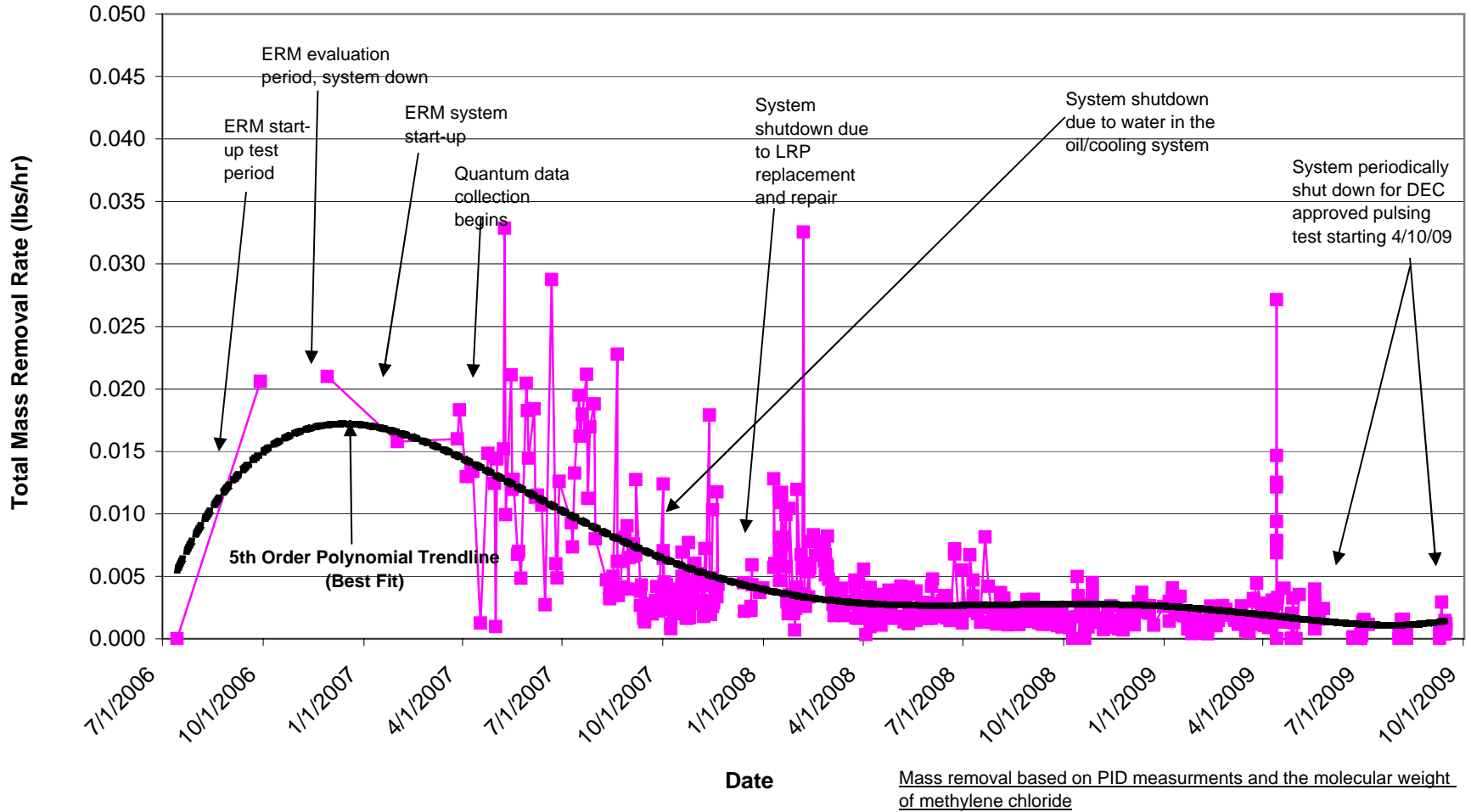


Figure 2A

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
September 2009

Total VOC Mass Removal Rate (Vapor & Ground Water Combined) Since March 2008

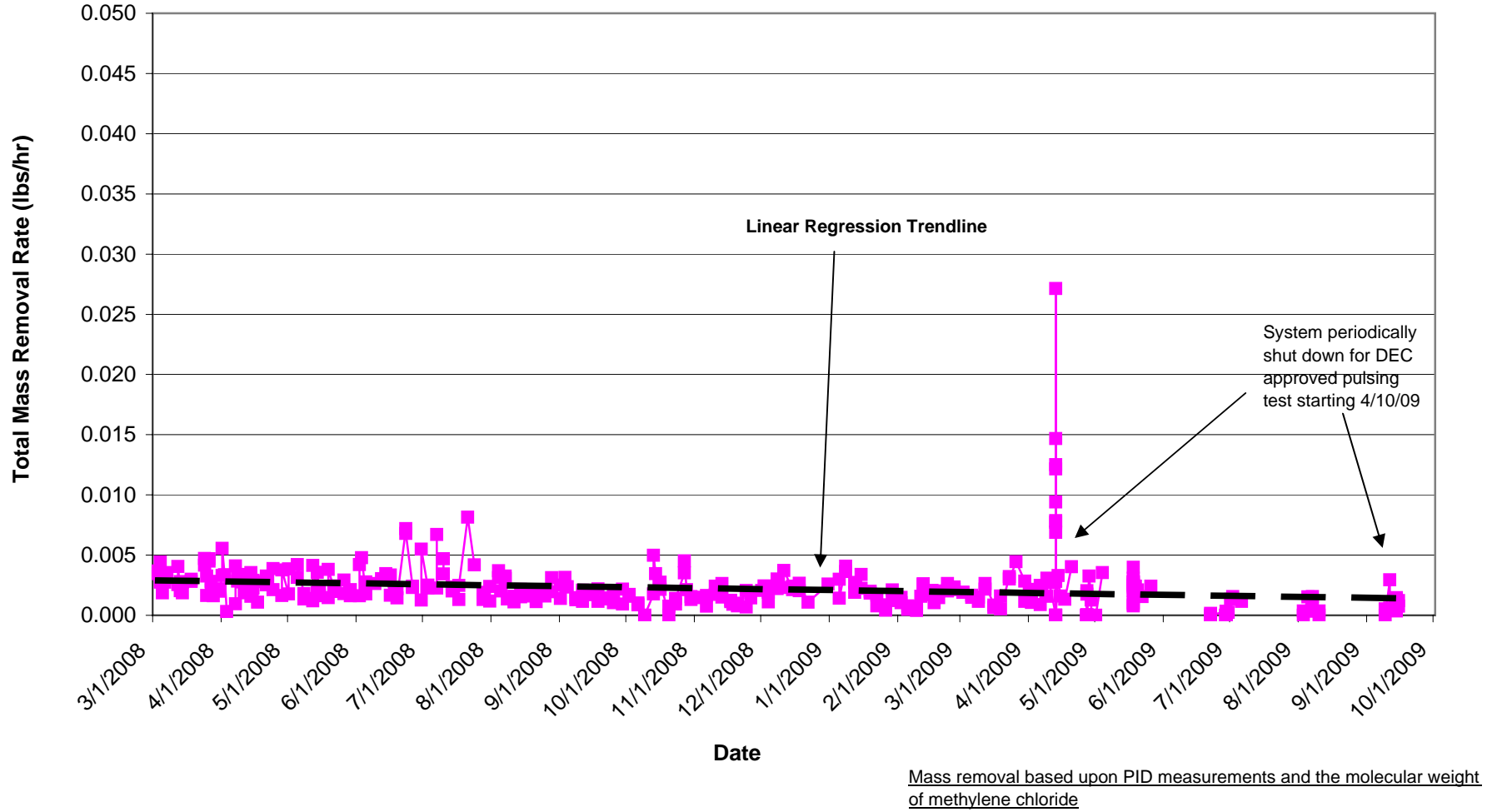


Figure 3
MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
September 2009

Vapor Mass Removal Rate

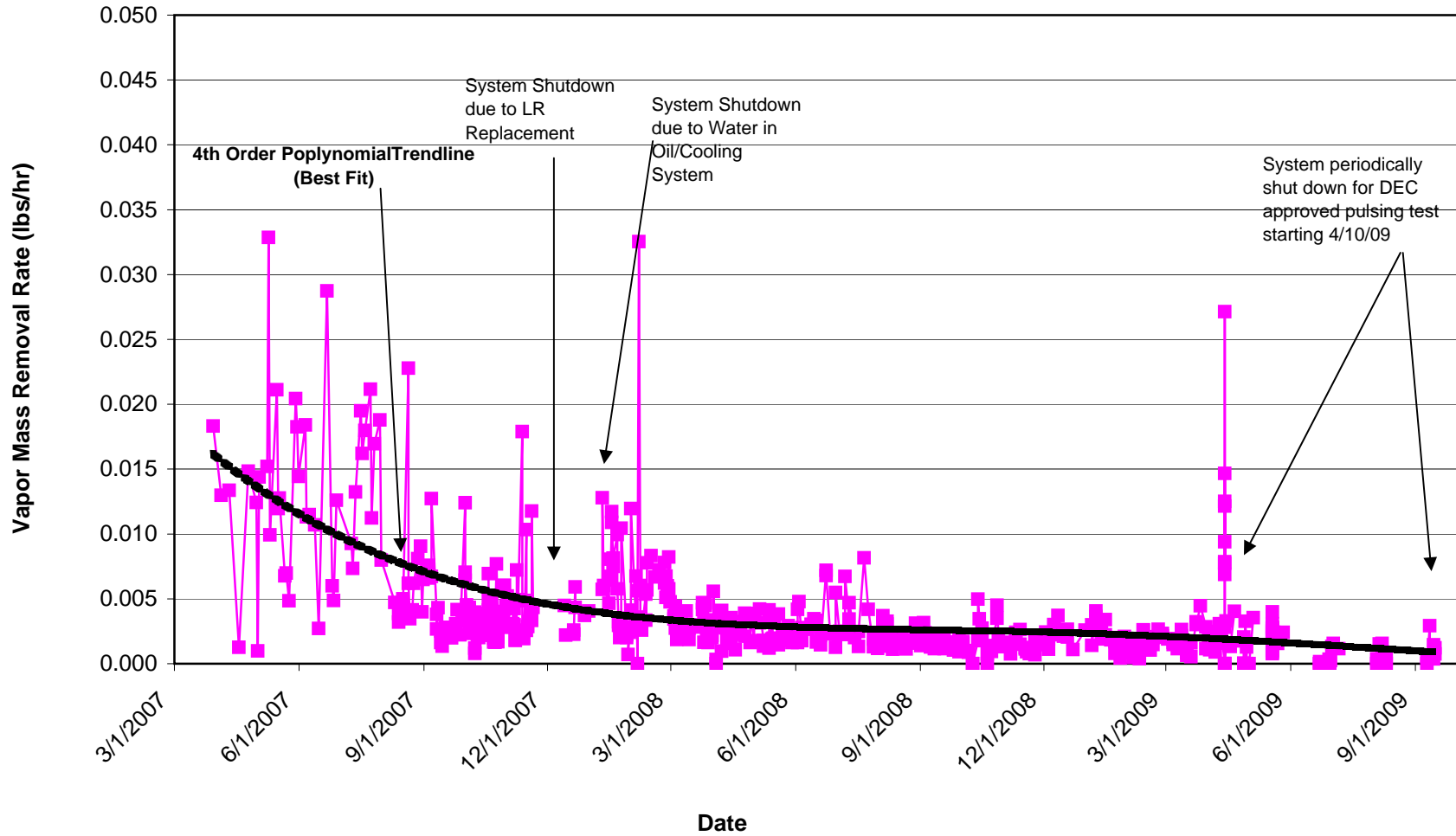


Figure 3A

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
September 2009

Vapor Mass Removal Rate Since March 2008

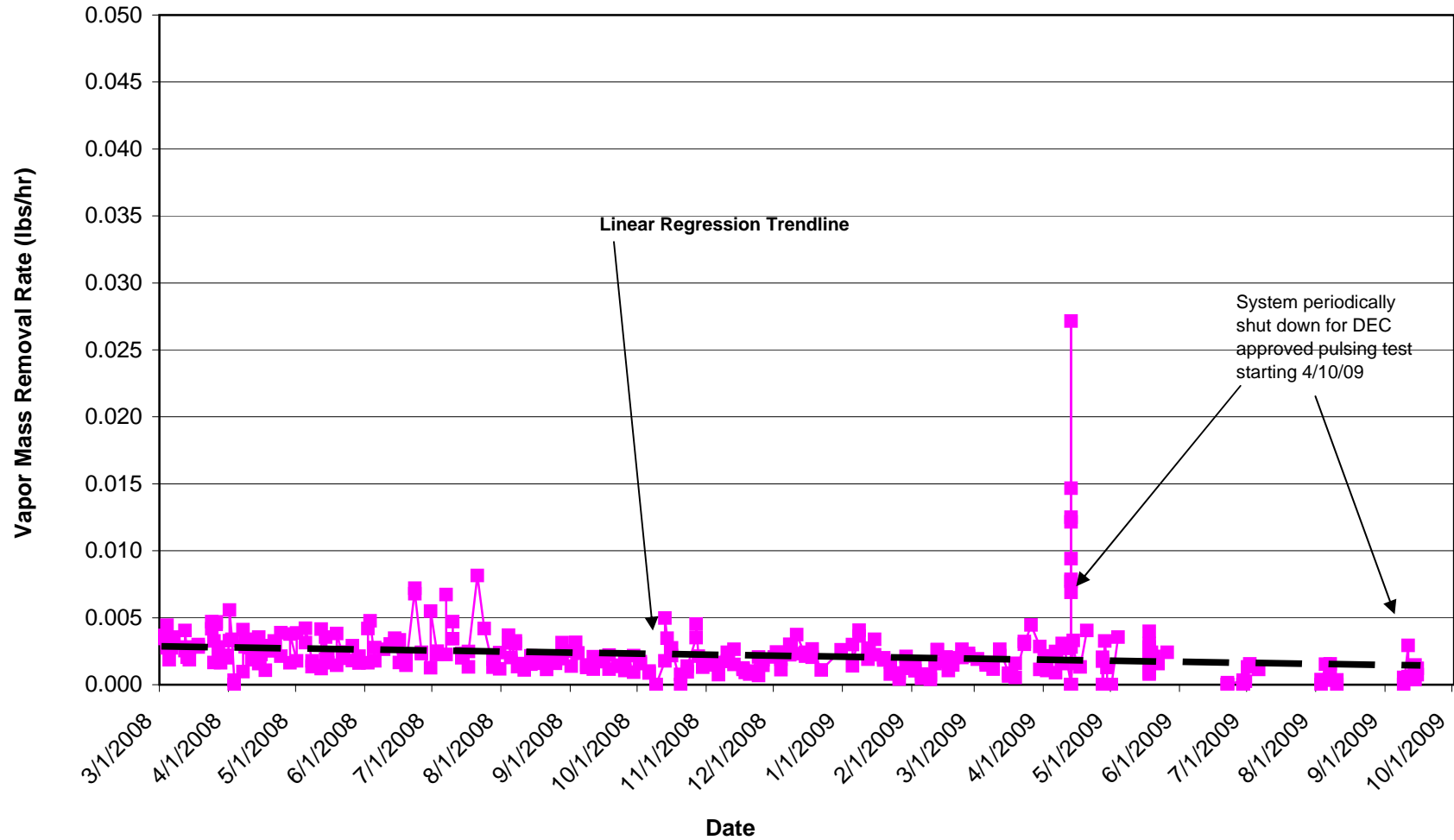
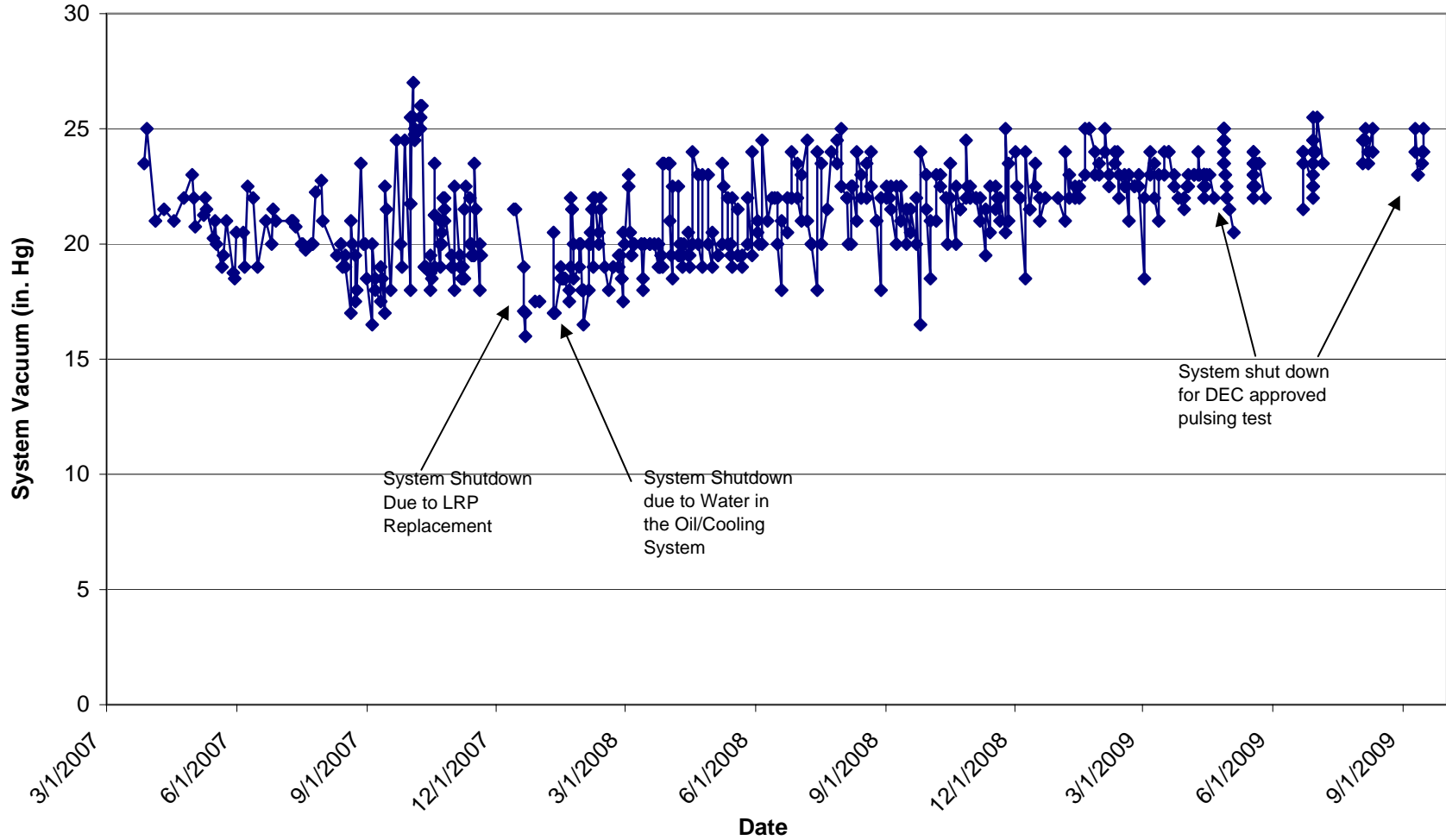


Figure 4

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
September 2009

System Vacuum

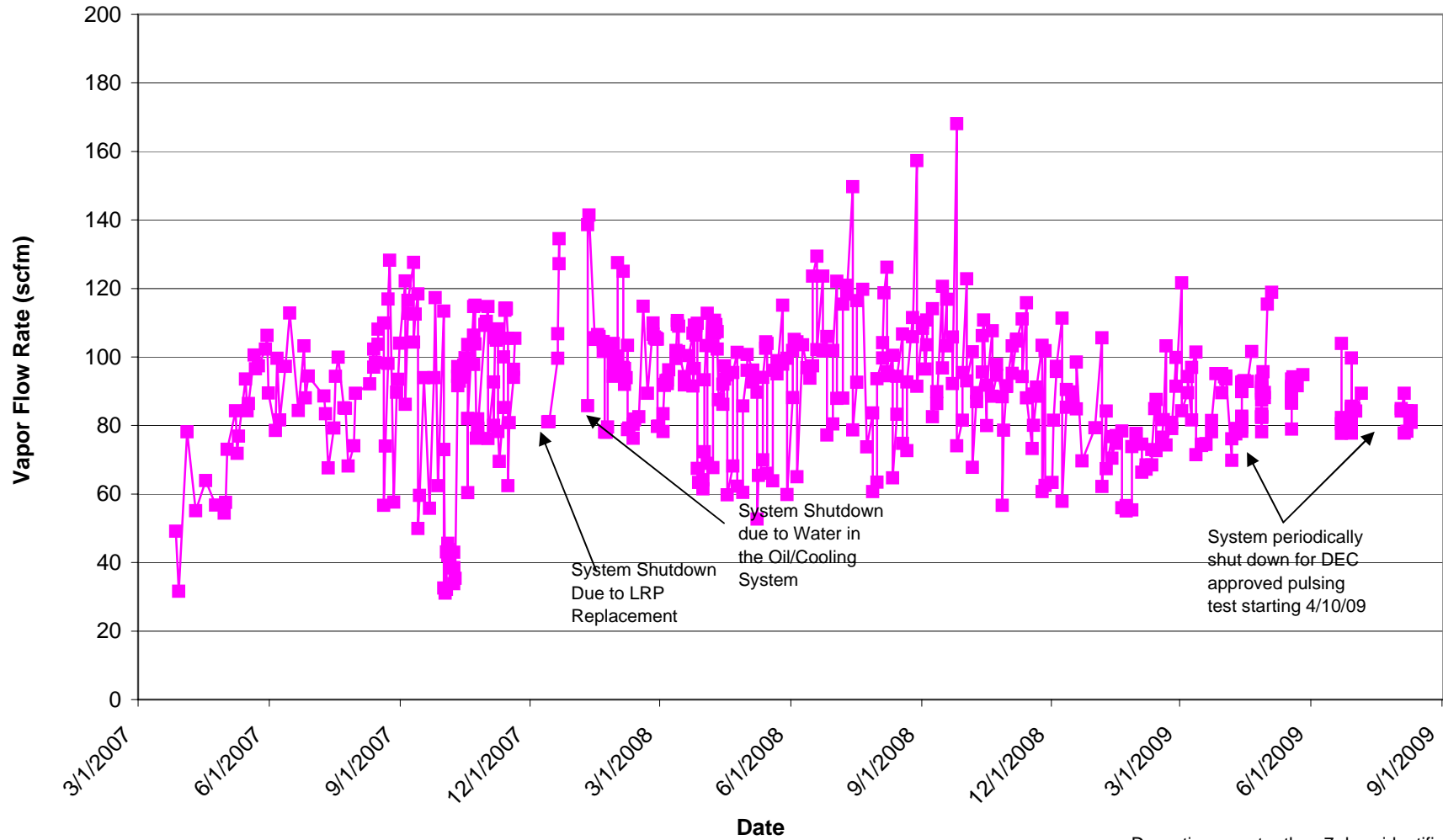


-Down time greater than 7 days identified on chart

Figure 5

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
September 2009

System Vapor Flow Rate



-Down time greater than 7 days identified on chart

Figure 6

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
September 2009

Total MeCl Mass Removed (Ground Water)

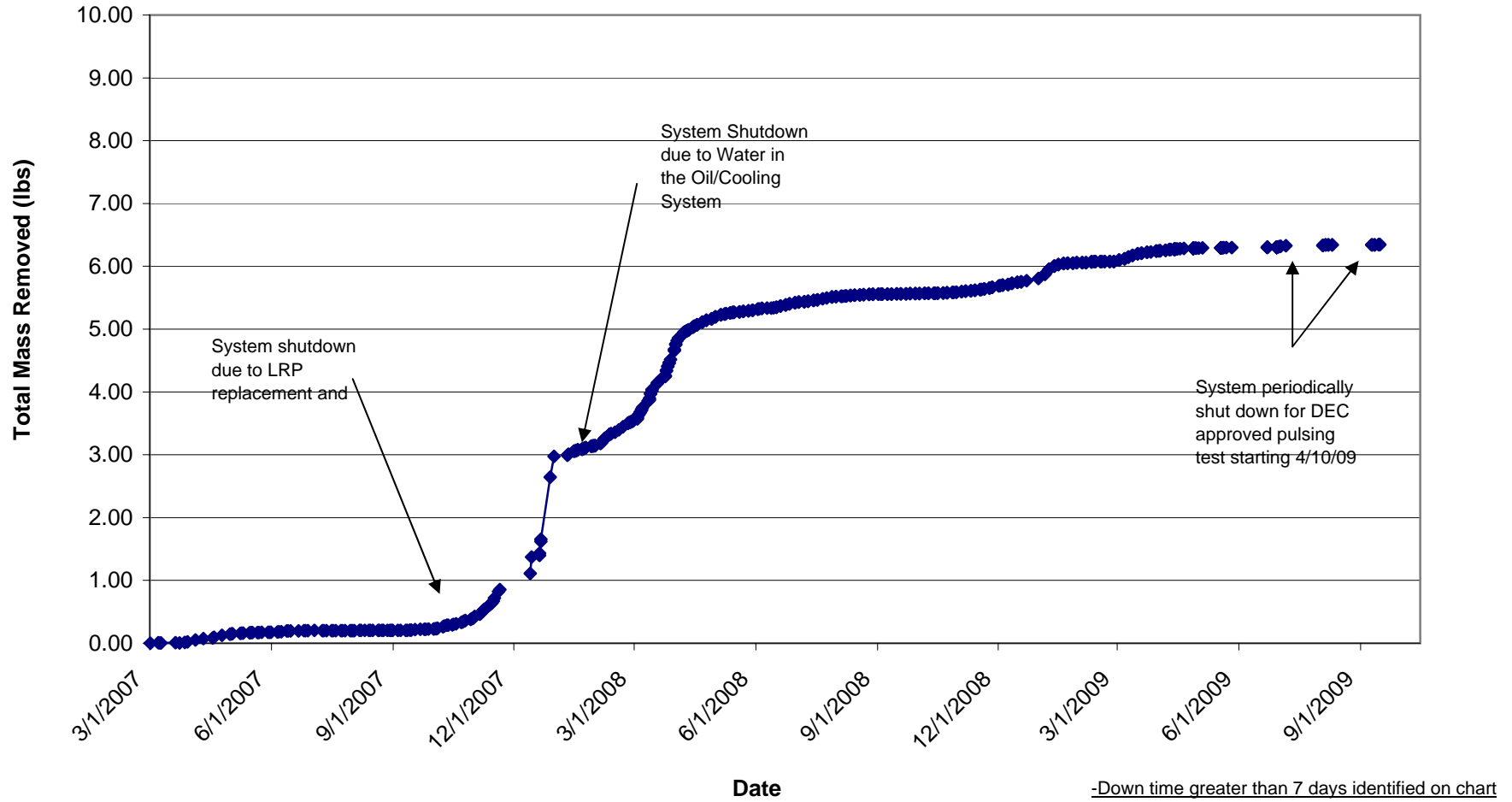


Figure 7

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
September 2009

MeCl Mass Removal Rate (Ground Water)

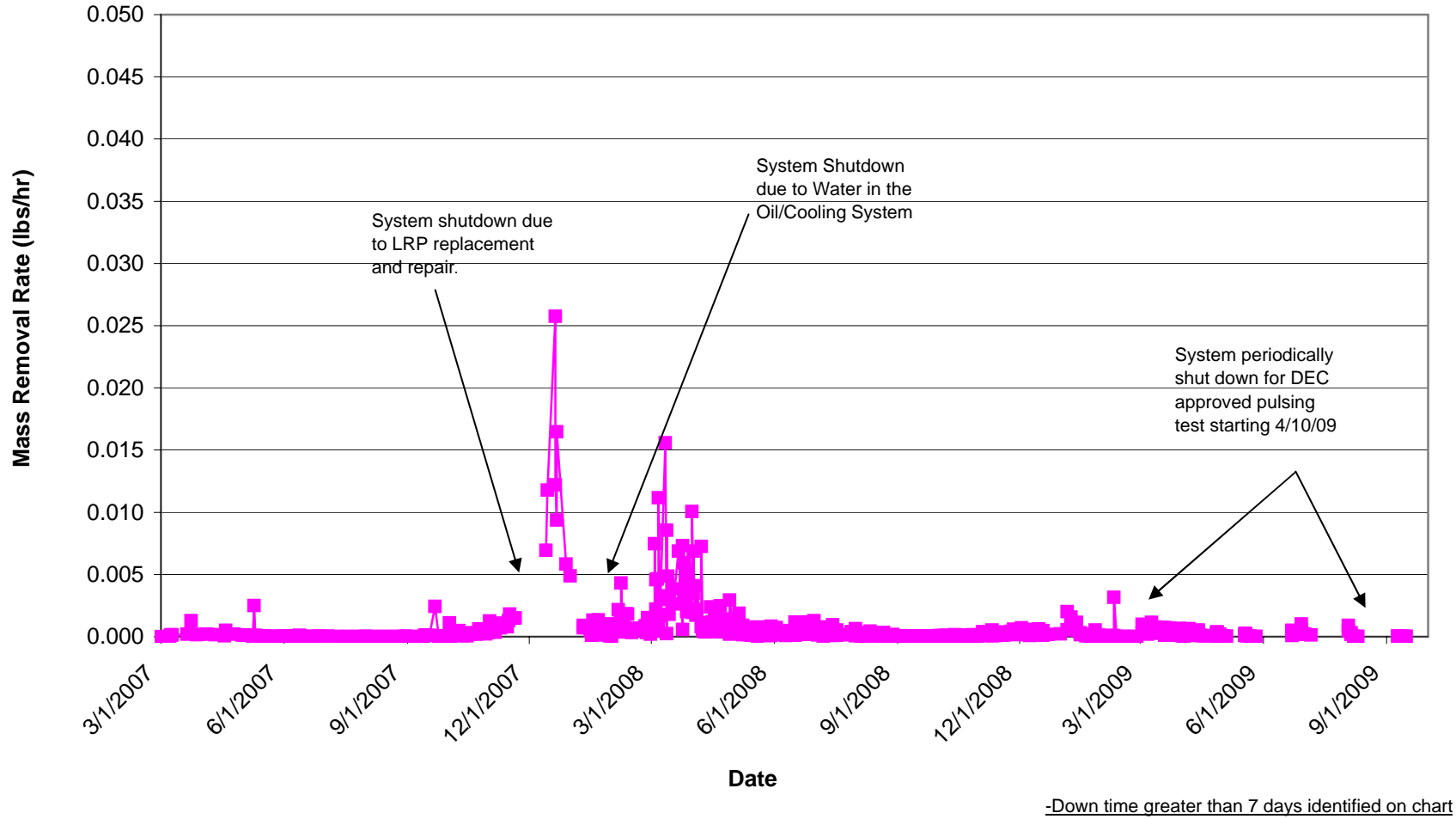
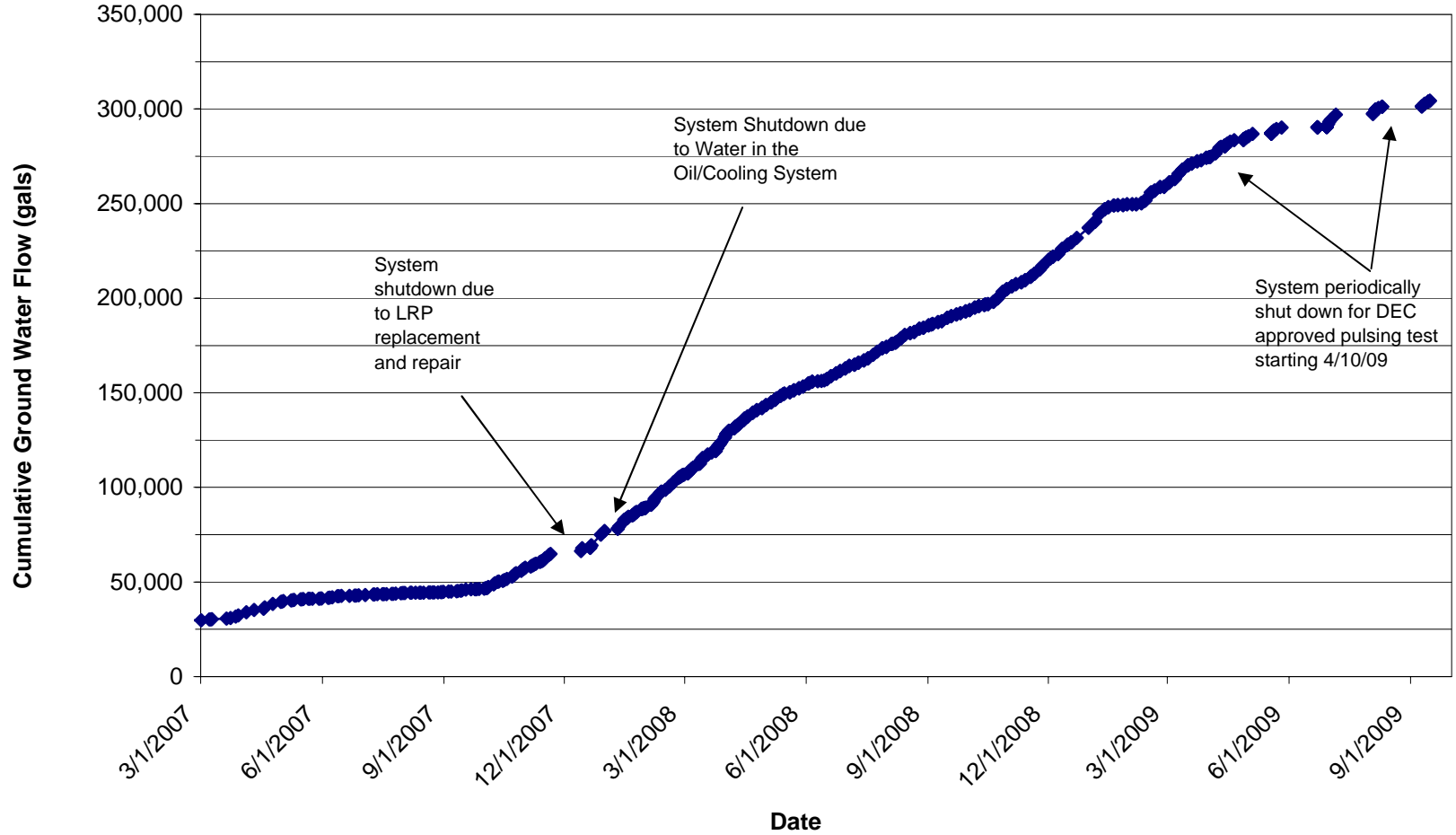


Figure 8

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
September 2009

Cumulative Ground Water Flow



System shutdown due to LRP replacement and repair

System Shutdown due to Water in the Oil/Cooling System

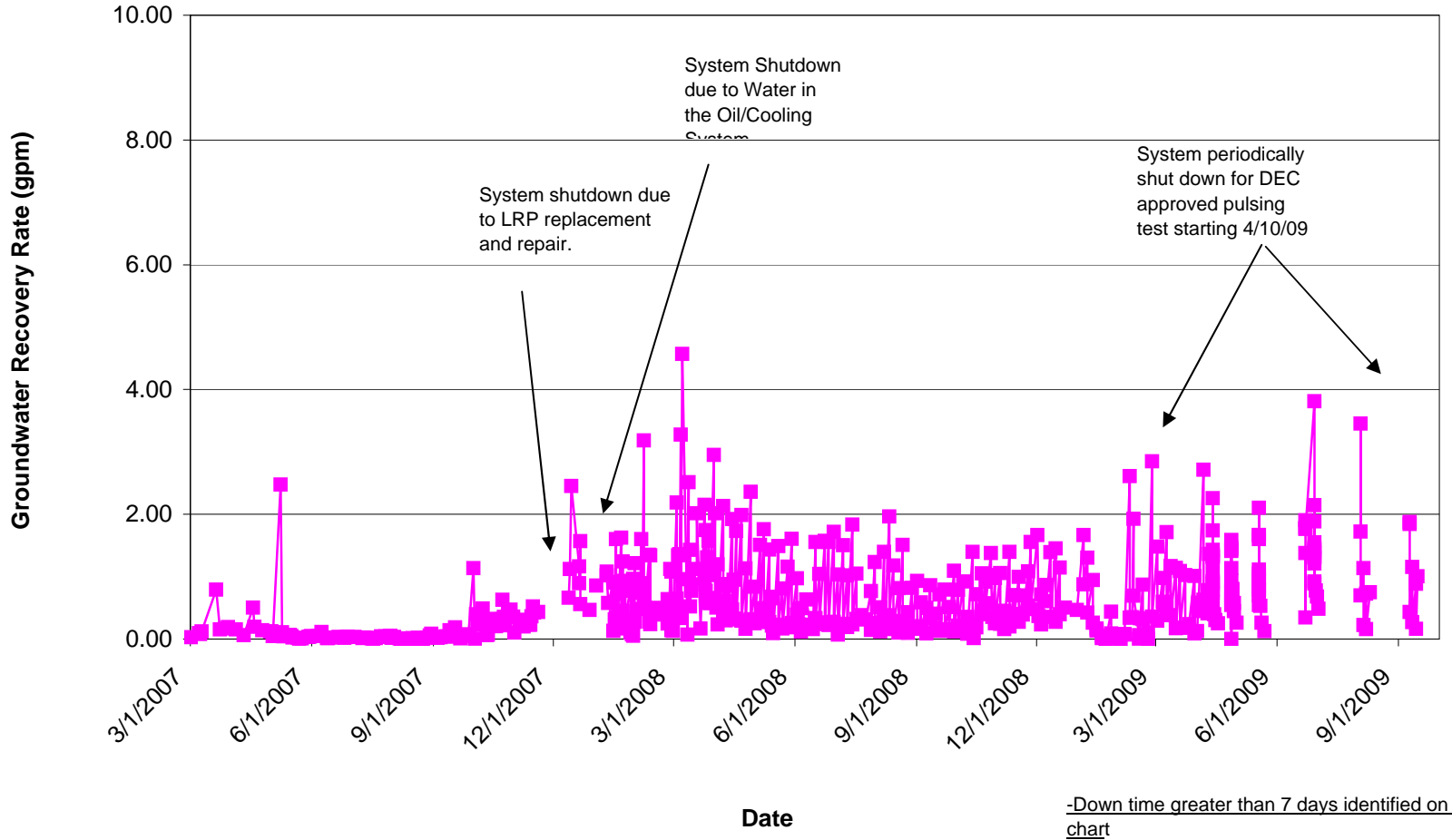
System periodically shut down for DEC approved pulsing test starting 4/10/09

-Down time greater than 7 days identified on chart

Figure 9

MCA Remediation System
755 Jefferson Road, Henrietta, NY
NYSDEC VCP # V00126-8
September 2009

Ground Water Recovery Rate



Analytical Data



PARADIGM
ENVIRONMENTAL SERVICES, INC.

Analytical Report Cover Page

Quantum Management Group

For Lab Project # 09-3302
Issued September 18, 2009
This report contains a total of 5 pages

The reported results relate only to the samples as they have been received by the laboratory.

Any noncompliant QC parameters having impact on the data are flagged or documented on the final report.

All soil/sludge samples have been reported on a dry weight basis, unless qualified "reported as received". Other solids are reported as received.

Each page of this document is part of a multipage report. This document may not be reproduced except in its entirety, without the prior consent of Paradigm Environmental Services, Inc.

The Chain of Custody provides additional information, including compliance with sample condition requirements upon receipt. Sample condition requirements are defined under the 2003 NELAC Standard, sections 5.5.8.3.1 and 5.5.8.3.2.

NYSDOH ELAP does not certify for all parameters. Paradigm Environmental Services or the indicated subcontracted laboratory does hold certification for all analytes where certification is offered by ELAP unless otherwise specified.

Data qualifiers are used, when necessary, to provide additional information about the data. This information may be communicated as a flag or as text at the bottom of the report. Please refer to the following list of frequently used data flags and their meaning:

"ND" = analyzed for but not detected.

"E" = Result has been estimated, calibration limit exceeded.

"D" = Duplicate results outside QC limits. May indicate a non-homogenous matrix.

"M" = Matrix spike recoveries outside QC limits. Matrix bias indicated.

"B" = Method blank contained trace levels of analyte. Refer to included method blank report.

Volatile Analysis Report for Water

 Client: Quantum Management Group

Client Job Site:	MPRS @ UCB Jefferson Rd.	Lab Project Number:	09-3302
Client Job Number:	N/A	Lab Sample Number:	10220
Field Location:	PreBT / Inf 1,2,3 Comp	Date Sampled:	09/11/2009
Field ID Number:	N/A	Date Received:	09/11/2009
Sample Type:	Water	Date Analyzed:	09/17/2009

Liquid Influent


Compounds	Results in ug / L
Acetone	ND< 10.0
Amyl Acetate	ND< 25.0
Benzene	ND< 0.700
2-Butanone	ND< 10.0
Carbon disulfide	ND< 5.00
Chloroform	ND< 2.00
Chloromethane	ND< 2.00
cis-1,2-Dichloroethene	ND< 2.00
Ethyl acetate	ND< 25.0
Isopropyl acetate	ND< 25.0
Methylene chloride	28.5
m,p-Xylene	ND< 2.00
o-Xylene	ND< 2.00

ELAP Number 10958

Method: EPA 624

Data File: V68690.D

Comments: ND denotes Non Detect
 ug / L = microgram per Liter

Signature: 
 Bruce Hoogesteger: Technical Director

Volatile Analysis Report for Water

Client: Quantum Management Group

Client Job Site: MPRS @ UCB
Jefferson Rd.
Client Job Number: N/A
Field Location: SP-302 / Eff 1,2,3 Comp
Field ID Number: N/A
Sample Type: Water

Lab Project Number: 09-3302
Lab Sample Number: 10221
Date Sampled: 09/11/2009
Date Received: 09/11/2009
Date Analyzed: 09/16/2009

Liquid Effluent


Compounds	Results in ug / L
Acetone	ND< 10.0
Amyl Acetate	ND< 25.0
Benzene	ND< 0.700
2-Butanone	ND< 10.0
Carbon disulfide	ND< 5.00
Chloroform	ND< 2.00
Chloromethane	ND< 2.00
cis-1,2-Dichloroethene	ND< 2.00
Ethyl acetate	ND< 25.0
Isopropyl acetate	ND< 25.0
Methylene chloride	ND< 5.00
m,p-Xylene	ND< 2.00
o-Xylene	ND< 2.00

ELAP Number 10958

Method: EPA 624

Data File: V68674.D

Comments: ND denotes Non Detect
ug / L = microgram per Liter

Signature: 
Bruce Hoogesteger: Technical Director



Volatile Analysis Report for Air

Client: Quantum Management Group

Client Job Site:	MPRS @ UCB Jefferson Rd	Lab Project Number:	09-3302
		Lab Sample Number:	10222
Client Job Number:	N/A	Date Sampled:	09/11/2009
Field Location:	SP-102 Tedlar Bag	Date Received:	09/11/2009
Field ID Number:	N/A	Date Analyzed:	09/15/2009
Sample Type:	Air		

Vapor Influent


Compound	Results in PPBv	Results in ug / m3
Acetone	ND< 4,220	ND< 10,000
Benzene	ND< 627	ND< 2,000
2-Butanone	ND< 3,400	ND< 10,000
Carbon disulfide	ND< 643	ND< 2,000
Chloroform	ND< 414	ND< 2,000
Chloromethane	ND< 978	ND< 2,000
cis-1,2-Dichloroethene	ND< 509	ND< 2,000
Methylene chloride	ND< 1,460	ND< 5,000
m,p-Xylene	ND< 461	ND< 2,000
o-Xylene	ND< 461	ND< 2,000

ELAP Number 10958

Method: EPA 8260B
Modified for Tedlar Bag

Data File: V68658.D

Comments: ND denotes Non Detect
PPBv = Parts per Billion volume
ug / m3 - Microgram per cubic meter.

Signature: 
Bruce Hoogesteger: Technical Director

Appendix D

Approved Site Management Plan



SITE MANAGEMENT PLAN

**755 JEFFERSON ROAD FACILITY
HENRIETTA, NEW YORK
MONROE COUNTY
(VCP NUMBER V00126-8)**

Prepared By:

Kleinfelder Engineering, P.C.
1279 Route 300, 2nd Floor 2
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(845) 567-6530

Prepared For:

UCB Manufacturing, Inc.
755 Jefferson Road
Henrietta, New York 14623

SITE MANAGEMENT PLAN

Prepared for:

UCB Manufacturing, Inc.
755 Jefferson Road
Henrietta, NY 14623

**SITE MANAGEMENT PLAN
755 JEFFERSON ROAD FACILITY
HENRIETTA, NEW YORK
MONROE COUNTY**

Kleinfelder Job No. 119502

Quality Assurance/Quality Control

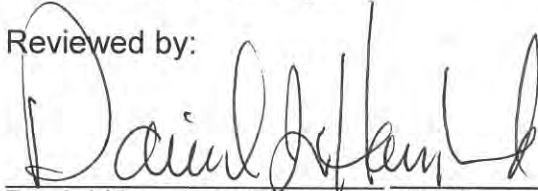
The following personnel have reviewed this report for accuracy, content and quality of presentation:

Prepared by:



Alexander Wirth
Senior Project Geologist

Reviewed by:



Daniel Harpstead, P.E., #086069
President



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August 3, 2011

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- Appendix III - Annual Institutional Control/Engineering Control Certification Form
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- Appendix V - Deed Restriction (Draft as of 7/5/2011)
- Appendix VI - Excavation Work Plan
- Appendix VII - Post Remedial Soil Boring Logs

1.0 INTRODUCTION

This Site Management Plan (SMP) has been prepared for the known areas of concern at the property located at 755 Jefferson Road in the Town of Henrietta, Monroe County New York under the New York State Department of Environmental Conservation (NYSDEC) Voluntary Cleanup Program (VCP). A NYSDEC issued checklist was used to guide preparation of this SMP, and a copy of the completed checklist is included in Appendix I. It has been annotated to indicate where in this SMP or the MCA OM&M FER each checklist item is addressed.

In 1996 Medeva Pharmaceutical Manufacturing Inc. (a predecessor of UCB Manufacturing, Inc., "UCB") purchased a manufacturing and research facility located at 755 Jefferson Road in Henrietta, New York (the "Property") from Rhone-Poulenc Rorer ("RPR"). During Medeva's pre-acquisition due diligence, it discovered that prior operations on the Property had resulted in releases to the environment at the two locations discussed below. Thereafter, a Voluntary Cleanup Agreement (VCA) (Index Number D8-0001-97-07 was entered into by Medeva Pharmaceuticals Manufacturing, Inc. and the New York State Department of Environmental Conservation (NYSDEC, 1998). The Site and Property location and features are shown on Figure 1.

Under the New York State Voluntary Cleanup Program (VCP), the Volunteer is required to remediate the Site in accordance with the VCP Agreement (Agreement) made with the NYSDEC dated March 31, 1998 (Agreement Index Number D8-0001-97-07), VCP Number V00126-8). This VCA required the Volunteer to investigate and remediate the identified areas of impacted media at the VCA-defined Site. Figure 1 identifies the Site boundaries and boundaries of the Property. The boundaries of the Site will be more fully described in the deed description that is included within the Deed Restriction and the letter granting releases and covenants associated with completion of the work under the VCA (Certificate of Completion).

This SMP was prepared by Kleinfelder Engineering, P.C. on behalf of UCB, in accordance with the requirements in NYSDEC draft DER-10 Technical Guidance for Site Investigation and Remediation, dated May 2010, and the guidelines provided by NYSDEC. Among other things, this SMP describes the means for implementing the Institutional Controls (ICs) that are specified in the Deed Restriction for the Site. A draft copy of the Deed Restriction has been submitted to NYSDEC for approval prior to its being filed and recorded and is included in Appendix V. The deed restriction will be recorded after NYSDEC approval of it and this SMP.

1.1 SITE DESCRIPTION

The Property is located in the Town of Henrietta, Monroe County New York, and identified as 5 Parcels being a part of Lots No. 6 & 8, Fourth Range, Township 12, Range 7 on the Town of Henrietta, County of Monroe, State of New York Tax Map. The Property is an approximately 40-acre area bounded by Jefferson Road to the north,

Strasenburgh Drive to the south, Clay Road to the east, and Marketplace Drive to the west (see Figure 1).

The Property is an active pharmaceutical manufacturing plant situated in a predominantly commercial area which is zoned commercial/industrial. There are three main buildings on Site. Two of the buildings, Building #1 and Building #2 are connected. Building #3 is located south of Buildings #1 and #2. There is a small building located along the western side of Building #3 near the southwestern corner of the building. This building contains the equipment used for performing the remediation at one of the identified areas of concern at the site. Figure 1 provides a general Property layout.

Two known areas of concern have been identified at the Site which is the portion of the Property which is the subject of the VCA. These areas are referred to as the:

- “Methylene Chloride Area” (MCA), and
- “Building 2 Sump Area” (B2SA).

Active remediation has been completed for both of these areas of concern. Institutional controls only apply to the MCA and are not required for the B2SA.

1.2 PURPOSE

The MCA portion of the Site contains residual chemicals of concern left in the area beneath and immediately adjacent to Building 3 after completion of the remedial action, hereafter referred to as ‘remaining contamination’. Institutional Controls (ICs) have been incorporated into the Site remedy for the MCA to control the potential for exposure to the remaining contamination during the use of the MCA portion of the Site to ensure protection of public health and the environment until such time as the Site specific remedial cleanup stands (see Table EWP-1 in Appendix VI) (RAOs) have been achieved in the MCA. A Deed Restriction approved by the NYSDEC, and to be recorded with the Monroe County Clerk, will require compliance with this SMP, including the specified ICs for the MCA until RAO’s are achieved. The ICs place restrictions on Site use, and mandate maintenance, monitoring and reporting measures related to each IC. Among other things, this SMP specifies the methods through which the ICs will be implemented within the MCA. Compliance with this plan by the grantor of the Deed Restriction and the grantor’s successors and assigns is required once it has been approved by the NYSDEC. This SMP may only be revised with the approval of the NYSDEC.

This SMP provides a detailed description of procedures required to manage the remaining contamination beneath and immediately adjacent to Building 3 within the MCA at the Site after completion of the Remedial Action, including: (1) implementation and management of the ICs; (2) media monitoring; (3) performance of periodic inspections, certification of results, and submittal of Periodic Review Reports.

It is important to note that:

- This SMP details the site-specific implementation procedures that are required as a condition of Site Closure. Failure to properly implement the SMP for the MCA may be a violation of the Deed Restriction, which is enforceable and may be grounds for revocation of the assignable release letter.
- Failure to comply with this SMP may also be a violation of Environmental Conservation Law, 6 NYCRR Part 375 and the VCA (Index #D8-0001-97-07; Site #V00126-8) for the site.

1.2.1 Revisions

Revisions to this SMP will be proposed in writing to the NYSDEC's project manager. In accordance with the Deed Restriction for the Site, the NYSDEC will provide a notice of any approved changes to the SMP, and append these notices to the SMP that is retained in its files, and if such revisions relate to the Deed Restriction, the proponent shall record only such approved revisions as a modification of the Deed Restriction.

1.3 SITE HISTORY

The Site was developed in the 1950s for the manufacture of pharmaceuticals and has been owned by several pharmaceutical companies since 1958. Activities associated with the manufacture, research, and administration of pharmaceutical products has been conducted continuously at the Site since its construction through today. In 1996, Rhone-Poulenc-Rorer (RPR) purchased the site from Fisons Pharmaceuticals. Later in 1996, RPR sold the Site to Medeva Pharmaceutical Manufacturing, Inc. (Medeva or Volunteer).

On March 31, 1998, Medeva Pharmaceuticals Manufacturing, Inc., which is now known as UCB Manufacturing, Inc. (the Volunteer) entered into a VCA with the NYSDEC to remediate the two identified areas of concern within the estimated 32 acre site located in the Town of Henrietta, County of Monroe, New York. While the entire property is approximately 40 acres in size, the site as defined within the VCA is approximately 32 acres (Figure 1).

Methylene Chloride is still in use by UCB as part of the manufacturing process within Building 3 at the site.

1.4 GEOLOGY AND HYDROGEOLOGY

The Site is located in the Erie-Ontario Lowlands Physiographic Province in western New York State. The Site occupies a nearly level, glacially influenced topographic surface. Bedrock observed during previous site investigations consists of green-gray shale at approximately 55 feet below grade. The shale bedrock is consistent with the mapped

bedrock units for this part of the Upper Silurian Vernon Formation. Surficial deposits at the Site generally consist of reddish-brown silt and clay with lesser amounts of brown fine/coarse grained sand and gray, rounded gravel. These deposits were most likely derived from fine-grained lacustrine sediments and/or from glacial till associated with the most recent Pleistocene ice age. Coarser material is more abundant at depths of 0 to 6-ft below ground surface (bgs) in comparison to deeper intervals. The relative permeability of surficial deposits at the site is considered low. ERM, a former Site consultant, classified the impacted saturated and unsaturated soils in the MCA as silts and sands.

Based on the groundwater elevations obtained during monitoring events, three different groundwater zones may exist beneath the Site: shallow, intermediate, and deep. The following describes the depth intervals of monitoring well screens for each of the three aquifers.

1.4.1 Shallow-Depth Wells

The shallow well group includes nine monitoring wells (MW-10, MW-11, MW-12, MW-13, MW-14, MW-15, MW-16, MW-18 and MW-19), three piezometers (P-1S, P-4S and P-6S) and one recovery well (RW-2). Shallow wells are screened from 2 to 18 ft bgs. The top of the shallow groundwater table varies from 3 to 8 ft bgs (approximately) across the MCA. The following wells have been used for gauging of water levels during sampling events: MW-11, MW-14, MW-15 and P-6S. The following wells have been used during sampling events for collecting groundwater samples for chemical analysis and for gauging: MW-12, MW-16, MW-18 and RW-2.

1.4.2 Intermediate-Depth Wells

The intermediate well group includes five vertical wells and four angled wells. The intermediate vertical wells are screened from 15 to 35 ft bgs, and the intermediate angled wells are screened from 30 to 50 ft bgs. The intermediate zone appears to be a confined formation, with a potentiometric surface at approximately 3 ft bgs. The following intermediate wells have been used for collecting groundwater samples for chemical analysis and for gauging of water levels during sampling events: MW-D8, RW-3, RW-4, RW-5 and RW-6.

1.4.3 Deep-Depth Wells

The deep well group includes nine vertical wells and four angled wells. The deep vertical wells are screened from 42 to 70 ft bgs. The deep angled wells are screened within the same interval as the deep vertical wells. The depth to bedrock varies between approximately 50 and 70 ft bgs in the MCA. The deep aquifer appears to be a confined formation, with a potentiometric surface at approximately 25 ft bgs. The following deep wells have been used for gauging of water levels during sampling events: MW-D1, MW-D2, MW-D3, MW-D4 and MW-

D5. The deep wells that have been used for collecting groundwater samples for chemical analysis and gauging of water levels during sampling events: MW-D6, MW-D7, MW-D9, MW-D10, MW-D11, MW-D12 and MW-D13.

1.4.4 Wells/Piezometers No Longer Used

The following wells and piezometers are no longer used and have been abandoned in accordance with NYSDEC approvals and requirements.

- In the shallow zone: MW-10, MW-11, MW-14, MW-15, MW-19, RW-2, P-1S, P-4S and P-6S.
- In the intermediate zone: MW-20A, MW-20B, MW-21, MW-22, EXSB-1, EXSB-2, P-3I, P-5I and P-7I.
- In the deep zone: MW-D1, MW-D2, MW-D3, MW-D4, MW-D5, MW-D11 and P-2D.

1.4.5 Groundwater Flow

Based on groundwater elevation gauging data without the system operating, groundwater flow direction appears to vary from a northeast direction to a southeast direction. See Figure 3. Groundwater velocity at the site has been estimated based upon transmissivity values calculated within the Data Gap Investigation Report and Proposed Remedial Action Plan (DGI), dated March 1999 using data from piezometer PZ-1 and soil classification at the site. Groundwater velocity for the shallow, intermediate and deep zones has been estimated as 0.28 ft/yr. The formulas and values used to calculate groundwater velocity at the site are listed below:

Given Values:

Hydraulic Gradient (i) = 0.06 ft/ft

Transmissivity (T) = 1.6×10^{-4} ft²/min

Saturated Thickness (b) = 53 ft (Overburden only)

Effective Porosity (N_e) = 34% (Domenico & Schwartz 1990)

Formulas:

$K = T/b = (1.6 \times 10^{-4} \text{ ft}^2/\text{min}) / (53 \text{ ft})$

$K = 3.02 \times 10^{-6} \text{ ft}/\text{min} = 1.59 \text{ ft}/\text{yr}$

$V = K/N_e = (1.59 \text{ ft}/\text{yr}) (0.06 \text{ ft}/\text{ft}) / 0.34$

$V = 0.28 \text{ ft}/\text{yr}$

1.5 SUPPORTING SITE RELATED DOCUMENTS

The following documents were previously prepared for this Site:

- The "Voluntary Cleanup Work Plan - Data Gap Investigation" (VCWP), dated 1997, was prepared and submitted by ERM. The VCWP describes proposed additional investigation activities to ERM's Phase II investigation of the Site.
- The "Data Gap Investigation Report and Proposed Remedial Action Plan" (DGI), dated March 1999, was prepared and submitted by ERM. The DGI describes the Data Gap 1997 investigation activities and results.
- The "Consolidated Remediation Work Plan" (CRWP), dated April 2002, was prepared and submitted by ERM. The CRWP describes remedial techniques and protocols and presents a proposed schedule for Site remediation activities.
- "Methylene Chloride Area (MCA) Remedial Design Investigation Work Plan," (RDIWP), dated August 2002, was prepared and submitted by ERM. The RDI is an addendum to the CRWP and addresses concerns raised by the Monroe County Department of Health (MCDOH) and the New York State Department of Health (NYSDOH). It proposed additional investigations to more fully estimate the extent of affected soil and groundwater in the MCA area of concern.
- The "Remedial Action Selection Report," (RAS), dated October 2002, was prepared and submitted by ERM. The RAS was prepared to satisfy the requirements described in Section 7.4 of the NYSDEC Draft VCP Guidance. The RAS documents the engineering analysis performed to determine if the proposed remedial approach can achieve the cleanup goals for the Site. It also presented a comparison of the remedial approach against the remedial selection criteria found at 6 NYCRR 375-1.10(c).
- "The Building #2 Sump Area Final Engineering Report", Submitted in February 2006 by ERM summarizes the remedial activities completed in the sump area of building # 2.
- "The MCA Remedial Final Engineering Report", submitted in January 2008 by ERM and summarizes the results of the MCA Remedial Design Investigation, describes the remedial activities performed at the Site, and provides information describing the construction and standard operating procedures for the Multi Phase Remediation System.
- The MCA "Operations, Maintenance, and Monitoring Plan" (OM&M Plan), dated January 2008, was prepared and submitted as Appendix L to the January 2008 MCA Remedial FER by ERM. The OM&M Plan describes the operation of the MPRS, presents a schedule for maintenance activities and discusses the basic requirements for waste disposal. The reporting requirements associated with operating the system are also presented in the OM&M Plan. The OM&M Plan also includes a sampling protocol for the MCA. In addition, the OM&M Plan provides a suggested sampling protocol to monitor the effectiveness of the MPRS. The pending OM&M Plan includes an addendum submitted in August

2008 which defined an alternate method of using non-dedicated submersible pumps for collecting the groundwater samples from the monitoring wells. The contents of the OM&M Plan satisfy the requirements of a VCP site monitoring plan for the MCA.

- “MPRS Pulsing Test Summary Report” (MPTR) was submitted to the Department in August 2009. It summarizes the results of the Methylene Chloride recovery rates while pulsing the system on for seven days while shutting the system off for periods ranging from 48 hours to four weeks.
- The MCA Operational, Maintenance & Monitoring Final Engineering Report (April 2010)

1.6 SUMMARY OF REMEDIAL ACTIONS

Two known areas of concern have been identified at the Site (Figure 1):

- the “Methylene Chloride Area” (MCA) and
- the “Building 2 Sump Area” (B2SA).

1.6.1 MCA

Previous investigations at the Site identified an area of concern on the west side of Building #3 in the vicinity of a former 2,600-gallon Methylene Chloride aboveground storage tank (AST). The former AST has been removed from the Site, although Methylene Chloride is still used in manufacturing operations at the Site. The areal extent of the MCA was initially determined based on the presence of impacted soil and groundwater containing Methylene Chloride concentrations exceeding regulatory criteria. The ground surface over the MCA is occupied by an asphalt parking lot, a small vegetated area, and a portion of Building #3. The MCA was delineated by previous soil and groundwater investigations, further described in reports prepared by ERM in 1996 and 1997, which were submitted to, and approved by, the Department. A map showing the location of the MPRS remediation building is presented in Figure 2.

With Department oversight, a Multi-Phase Recovery System (MPRS) was installed and has been operating at the Site from July 2006 until July 2010. The purpose of the MPRS was to control contaminant migration, and to remediate the MCA to reduce the residual chemical concentrations in soil and groundwater following removal of the tank from this area. The MPRS included a combined groundwater treatment system and a vapor treatment system. Approval was granted by the NYSDEC (via email correspondence dated July 29, 2010) to terminate system operation following the July 2010 operational period. Methylene Chloride concentrations in the groundwater, soil vapor, and indirectly in the surrounding soil, were monitored by analyzing both groundwater and vapor samples collected from the recovery and monitoring wells associated with the

MCA and its MPRS. Additional details describing the equipment and former operation of the MPRS are provided in the Operation, Maintenance, and Monitoring Plan, presented in Appendix L of the MCA Remedial Final Engineering Report (January, 2008) which is incorporated by reference into this SMP. When the MPRS was operational, treated groundwater was discharged to the Town of Henrietta municipal sewer system. The Volatile Organic Compound (VOC) concentrations of the discharge are regulated by an Industrial Wastewater Discharge Permit issued by the Monroe County Department of Environmental Services (MCDES).

Active remediation of the MCA has been completed. Remedial actions taken are detailed in the MCA OM&M FER (Kleinfelder 2010). Due to the presence of residual contaminants in the groundwater, vapors and soils within the MCA, as discussed in the "current conditions" section below, the MCA has not achieved "unrestricted use" levels. Section 1.7 provides relevant information on Methylene Chloride, which is the primary site-related constituent left in the MCA at levels above the unrestricted use levels. The NYSDEC requires Institutional Control measures for the MCA until such time as, through natural attenuation mechanisms, the unrestricted use RAO's have been achieved. Sections 2.0 through 4.0 details the post closure work, institutional/engineering controls and monitoring related to the MCA that NYSDEC has determined is necessary for the MCA.

Possible MPRS permanent shutdown criteria discussed in the MCA Remediation FER include:

- Achievement of the Remedial Action Objectives;
- Achievement of 95% or greater mass reduction;
- Achievement of asymptotic contaminant removal rates;
- Evaluation of Methylene Chloride removal rates across the MCA;
- Consistency in concentration patterns before, during, and after pulsed operation of the system; or
- Demonstration that continued operation is not technically and/or economically feasible based on system performance and/or Site conditions.

A discussion of the current status of the MPRS relative to the original shutdown criteria presented in the 2008 FER, and the proposal for shutdown of the MPRS system is presented in the Methylene Chloride Area Operation Maintenance and Monitoring Final Engineering Report and Petition for Remedial Closeout which is being submitted concurrently with this SMP (MCA OMM FER, Quantum 2010).

Approval was granted by the NYSDEC (via email correspondence dated July 29, 2010) to terminate system operation following the July 2010 operational period. The MPRS system operation has been terminated in accordance with this approval.

As discussed in section 1.4.4, a total of 25 wells have been abandoned in accordance with NYSDEC requirements.

1.6.2 B2SA

With respect to the B2SA area, remediation has been completed. Remedial actions taken are detailed in the Building #2 Sump Area Final Engineering Report (ERM 2006) and in the subsequent NYSDEC response letter dated May 1, 2006. Soils have been cleaned to "unrestricted use" levels and NYSDEC has approved the Remedial FER for this area. No post-closure work, institutional/engineering controls or monitoring related to the B2SA are necessary.

1.7 METHYLENE CHLORIDE

According to the Occupational Health and Safety Administration (OSHA), Methylene Chloride, also called Dichloromethane, is a volatile, colorless liquid with a moderately sweet, Chloroform-like odor. Its volatility and ability to dissolve a wide range of organic compounds makes Methylene Chloride an ideal solvent for many chemical processes, including pharmaceutical manufacturing, paint stripping, paint remover manufacturing, and metal cleaning and degreasing.

The National Institute of Occupational Safety and Health (NIOSH) list the means of exposure to Methylene Chloride as inhalation, skin absorption, ingestion, and eye contact. The most common means of exposure are inhalation and skin exposure. OSHA has established a Permissible Exposure Limit for Methylene Chloride.

NIOSH consider Methylene Chloride to be a potential occupational carcinogen. According to OSHA, persons exposed to Methylene Chloride concentrations exceeding the OSHA exposure thresholds and time limits are at increased risk of developing cancer, adverse effects on the heart, central nervous system and liver, and skin or eye irritation. Symptoms of short-term exposure to Methylene Chloride concentrations above the OSHA short-term exposure thresholds include irritated eyes, weakness, exhaustion, dizziness, numbness, tingling in the limbs, and nausea.

1.8 REMAINING CONTAMINATION

Remediation of the B2SA has been completed. During the remediation, soils with contaminants at concentrations above the established RAOs were excavated. Excavated soils were sent off-site for appropriate disposal. The B2SA soils have been cleaned to "unrestricted use" levels. No post-closure work, institutional/engineering controls or monitoring related to the B2SA is necessary. Remedial actions are detailed

in the Building #2 Sump Area Final Engineering Report (ERM February 2006). The B2SA Remedial FER was approved in a letter by the NYSDEC dated May 1, 2006.

Remediation within the MCA extended beneath the slab of Building 3. The reduction of contamination in groundwater and soil vapor collected from beneath the building over time indicates that a reduction in contaminant levels has been achieved beneath the building. Contamination remaining in the MCA was encountered at depths of 14 feet below grade and lower during post remediation soil sampling. Based upon pre-remediation soil sampling, contamination has always been restricted to the overburden depth, the bottom of which is approximately 55 feet below grade. A demarcation layer does not exist within the MCA, therefore the Excavation Work Plan (Appendix VI) must be adhered to. Based on pre-remediation modeling and post-remediation sampling as well as the long term groundwater monitoring data, the bulk of the residual contamination appears to be present in the vicinity of recovery wells RW-4, RW-5 and MW-D8 at depths of 15 to 30 feet below ground surface.

An active water line is located within the MCA (Figure 1a) and will have to be avoided during any excavation in the area.

Post remedial soil samples indicate that Methylene Chloride concentrations within the interval of 14 to 55 feet below ground surface within a portion of the MCA can reach 90 parts per million (this sample was collected at 23 feet below grade). If utilities within the MCA are to be accessed below grade, compliance with the Excavation Work Plan is required (Appendix VI). As shown by the post remediation soil boring logs (Appendix VII), VOC soil vapor monitoring indicates that the shallowest area of contamination is first encountered at approximately 20 feet in soil boring SB-P3 (14 vertical feet below grade). Therefore, subsurface activities involving soil disturbance at depths of 10 feet and greater will require compliance with the Excavation Work Plan. Disturbance of soil which is limited to less than 10 feet below grade within the MCA is not considered a threat to human health and will not require adherence to the Excavation Work Plan.

If, in the future, a decision is made to remove either the water line or those portions of Building 3 which are located above the MCA, the soil that could be potentially disturbed by any redevelopment activities will be evaluated to determine the extent of residual contamination at that time. If precautions are required to protect construction or utility workers, these will be implemented. Any soils that will be removed will be characterized and properly disposed in accordance with applicable law. If additional institutional or engineering controls or measures (such as installing impervious cover) are required to ensure that there is no substantial risk to human health or the environment presented by such residual materials, these will be identified and implemented after discussion with the Department.

Table 1 summarizes the results of all soil samples remaining at the site after completion of the Remedial Action. The shaded concentration indicates those samples that had target analytes that exceed the unrestricted RAOs. While Methylene Chloride (and other constituents) have been removed from the MCA during the successful remediation

program, the post-remediation sampling indicates that residual contaminants above the RAOs remain. To be conservative, based on the data in Table 1, the entire area within the MCA boundaries at depths starting approximately 15 feet below the surface and extending at least 40 feet below the surface and potentially down to approximately 55 feet below the surface are deemed to potentially have residual soil contaminants at levels above the unrestricted RAOs as set out in the Remedial Action Selection report (ERM 2002) and approved by the Department in a letter dated December 19, 2002. All areas of the Site outside the MCA indicated on Figure 1 meet the RAOs for unrestricted use of the site based upon pre-remediation soil sampling.

2.0 POST REMEDIAL CLOSURE INSTITUTIONAL CONTROLS

Because this Site is covered by a VCP Agreement rather than by a Brownfields Cleanup Program Agreement, a deed restriction will be filed rather than a statutory environmental easement.

It is anticipated that the Institutional Controls discussed in the sections below will be put in place until the Site Specific RAOs for the MCA are achieved. These controls will eliminate or reduce the potential for human exposure to the remaining contaminants in the MCA. The following Institutional Controls will be implemented:

- The MCA may not be used for other than a Commercial or Industrial use without the express permission of NYSDEC. This Institutional Control will be implemented with a recorded Deed Restriction (Appendix V).
- The use of the groundwater underlying or potentially impacting groundwater from the MCA for potable water purposes is prohibited by local ordinance as well as the Deed Restriction. The use for other purposes is prohibited within the MCA unless it has received treatment rendering it safe for its intended non-potable use. This Institutional Control will be implemented with a recorded Deed Restriction (Appendix V).
- Compliance with this SMP by the Grantor and the Grantor's successors and assigns and any future owners/operators of the MCA.
- Groundwater monitoring of the MCA must be performed as defined in this SMP.
- All future activities on the property that will disturb soil within the MCA must be conducted in accordance with Section 2.1 of this SMP.
- If, before the RAOs have been achieved in the MCA, UCB empties, removes from service and properly decommissions the Methylene Chloride AST, and if UCB removes Methylene Chloride from the tank and associated piping and equipment and removes all potential contributing sources of Methylene Chloride to the indoor air from production/operation areas in Building 3, the potential for

vapor intrusion will be re-evaluated applying NYSDOH vapor intrusion guidance. If based on the results of the investigation NYSDEC or NYSDOH requires mitigation measures to address vapor intrusion risks, such measures will be installed. This may consist of either a combination of sub-slab and indoor air monitoring for Methylene Chloride, or the installation of an effective sub-slab depressurization system under the MCA portion of Building 3;

- Data and information pertinent to Site Management of the Site must be reported at the frequency and in a manner defined in this SMP.
- For as long as the Institutional Controls are in place, the Site owner will periodically submit to NYSDEC a written statement that certifies, under penalty of perjury, that: (1) controls employed at the Controlled Property are unchanged from the previous certification or that any changes to the controls were approved by the NYSDEC; and, (2) nothing has occurred that impairs the ability of the controls to protect public health and environment or that constitute a violation or failure to comply with the SMP. NYSDEC retains the right to request access to such Controlled Property at any time in order to verify the continued maintenance of any and all controls. This certification shall be submitted annually, or an alternate period of time that NYSDEC may allow and will be made by any person that the NYSDEC finds acceptable.

2.1 SOIL DISTURBANCE

Until site-specific cleanup criteria (RAOs) are met within the MCA, the removal, management and handling of soil encountered during any soil disturbance activities within the MCA will be restricted based upon this Site Management Plan and the attached Excavation Work Plan (Appendix VI). All such contemplated activities will be evaluated prior to commencement in order to reduce the risk of potential exposure of humans to contaminated soils during soil disturbance and/or groundwater encountered during associated dewatering activities within the MCA. This includes provisions to allow utilities in the MCA to be worked on without causing any unacceptable exposure to the public or workers from remaining residual contaminants.

Health and safety procedures which comply with the site specific Health and Safety Plan (Appendix II) and be consistent with the relevant provisions of 29 CFR 1910.120 until such time as RAO's are achieved in the MCA, are to be followed for all excavations or other activities within the MCA. The remedial party and/or Site owner will provide written notification to the NYSDEC prior to commencing work in this area.

If required by the NYSDEC General Stormwater SPDES Permit for Construction Activities in effect at the time, a Notice of Intent (NOI) for the soil disturbance activity within the MCA to be covered by that General SPDES Permit must be submitted and a Stormwater Pollution Prevention Plan (SWPPP) established and implemented.

If necessary, soil removed from the MCA will be characterized in accordance with applicable law and, if required by such law, transported off-Site to a permitted disposal facility. Fill brought to the Site for use within the MCA will be evaluated prior to being used as fill. All soil to be imported to or exported from the MCA portion of the Site will comply with the provisions of Section 5.4(e) of DER 10 (May 2010), including tables 5.4(e) 4 and 5.4(e)10.

Plans for the collection, management, handling and treatment of any contaminated groundwater resulting from the de-watering of excavations within the MCA will be established on a project-specific basis prior to any excavation activities within the MCA. Groundwater collected as a result of excavation de-watering activities within the MCA will be stored on Site and characterized prior to treatment and or disposal in accordance with applicable law.

2.2 HEALTH AND SAFETY PROGRAM

The potential pathways for exposure to the remaining residuals at the MCA are direct exposure to the impacted soil or groundwater contact and exposure to vapors emanating from the soil into unpaved areas or inside Building #3. Because the current manufacturing that occurs in Building #3 continues to use Methylene Chloride, the potential for worker exposure to this substance is subject to OSHA regulations and is not considered under this SMP. If in the future the use of Methylene Chloride is discontinued within the MCA (which includes a portion of Building #3) this SMP will be updated and vapor intrusion as a potential pathway would be further evaluated as discussed in Section 4.6. Appendix III includes the Institutional Control/Engineering Control Certification Form for the MCA. Each year during the post-operation period, a copy of this form signed by a Qualified Environmental Professional or a Professional Engineer licensed to practice in New York will be submitted to NYSDEC.

In the event that an individual is exposed to contaminated soil or groundwater during routine groundwater monitoring activities, decontamination facilities are present inside the MPRS building and at several locations within Building #3. Appropriate Personal Protective Equipment (PPE) is stored inside the MPRS building and in Building #3. A Site-specific Health and Safety Plan is provided in Appendix II of this document.

3.0 POST CLOSURE SITE MONITORING

The Post Closure Monitoring Plan describes the monitoring that is being done in order to evaluate the performance and effectiveness of the post-remediation plume management, monitored natural attenuation and affected groundwater as described below. The groundwater monitoring component of this plan has already been informally approved by NYSDEC and is being implemented. The remainder will be initiated after approval by NYSDEC. Significant changes to this Monitoring Plan must first be approved by NYSDEC.

3.1 PURPOSE AND SCHEDULE

The purpose of the monitoring is to verify that in the aftermath of the shut-down of the MPRS, groundwater with Site-related constituents of concern above the established RAOs is not migrating off the property and that contaminant concentrations continue to decrease. The groundwater sampling and monitoring component of this plan will continue to be performed using methods consistent with those used during the investigation and active remediation of the MCA, in order to allow meaningful comparison of the data produced through this program with historic groundwater data.

This Post Closure Monitoring Plan, including Appendix IV, describes the methods to be used for:

- Sampling and analysis of groundwater;
- Evaluating site information periodically to confirm that the remedy continues to be effective in protecting public health and the environment; and
- Preparing the necessary reports for the various monitoring activities.

To adequately address these issues, this Monitoring Plan provides information on:

- Sampling locations, protocol, and frequency;
- Information on all designed monitoring systems (e.g., well logs);
- Analytical sampling program requirements;
- Reporting requirements;
- Quality Assurance/Quality Control (QA/QC) requirements;
- Inspection and maintenance requirements for monitoring wells;
- Monitoring well decommissioning procedures; and
- Annual inspection and periodic certification.

Quarterly monitoring of the performance of the remedy and the overall reduction in contamination within the MCA will be conducted for the first two years after shutdown of the MRPS is approved. Thereafter, monitoring will be continued at a frequency determined by the results of the initial eight quarters of data. Changes in the frequency will be discussed with, and approved by, NYSDEC before they are implemented.

Trends in contaminant levels in groundwater in the MCA will be evaluated to determine if the plume management continues to be effective in achieving remedial goals. Monitoring programs are summarized in the following table and outlined in detail in Sections 3.2 through 3.8 below.

Monitoring/Inspection Schedule

Monitoring Program	Frequency*	Matrix	Analysis
Groundwater within the MCA	Quarterly for 2 years, then evaluated to determine future monitoring frequency	Groundwater	Selected Site Specific VOCs

* The frequency of events will be conducted as specified until otherwise approved by NYSDEC and NYSDOH.

3.2 GROUNDWATER MONITORING

A phased post-remediation monitoring program within and downgradient of the MCA is being implemented to monitor residual VOC concentrations and migration in the MCA. The network of monitoring wells that will be used in this program is a sub-set of the existing well network that had been installed to monitor both up-gradient and down-gradient groundwater conditions associated with the MCA.

Eight quarters of groundwater data will be used to verify that the concentrations are stable or declining and that impacted groundwater within the MCA has not migrated beyond the property boundary at levels above the groundwater standard. This assessment will be made based on the sentinel well(s) presented below. The sampling frequency may be modified with the approval of NYSDEC. The SMP will be modified to reflect all changes in sampling plans approved by NYSDEC. For at least the proposed quarterly monitoring for the first two years, one sample will be collected each quarter from each of the following wells.

- Shallow monitoring wells MW-12, MW-16, MW-18, MW-23S and RW-2,
- Intermediate monitoring wells MW-D8, MW-23I, RW-3, RW-4, RW-5 and RW-6,
- Deep wells MW-D6, MW-D7, MW-D9, MW-D10, MW-D12, MW-D13 and MW-23D.

Monitoring wells MW-23S/I/D are intended to serve as “sentinel wells” located between the known areas of impact within the MCA and the property boundary, as shown on Figures 3. Each vertical well is screened in the shallow, intermediate and deep intervals respectively. Sample collection will occur via the low flow sampling methods currently approved and used at the site.

Any Site-related VOC detected in the sentinel well will trigger further action. NYSDEC will be contacted and informed of the result(s) and the well will be re-sampled to verify that the Site-related VOC detection is real. This notification and scheduling of the re-sampling will generally occur within 48 hours of receiving the laboratory report. If any site-related VOC is present in the additional sample, then further actions may be taken. The potential further actions will be discussed with NYSDEC and a mutually agreed upon course of action will be identified and implemented.

The following Site-specific VOC list will be the analytical parameter list for the post remediation monitoring program.

- Acetone
- Benzene
- Carbon disulfide
- Chloroform
- Chloromethane
- Cis-1,2-Dichloroethene
- Dichlorodifluoromethane
- 1,1 Dichloroethylene
- Trans 1,2 Dichloroethene
- Ethyl acetate
- Isopropyl acetate
- Methylene chloride
- Methyl ethyl ketone
- Total Xylenes

For each of the initial 2 years of Post Closure Monitoring, the 4th quarter of monitoring will also include natural attenuation parameters. The final site-specific list of natural attenuation parameters will be selected based upon the type of fate and transport model used. The purpose of this model will be to facilitate the evaluation of natural attenuation on site and assist with the site specific parameters necessary for accurate modeling. A more detailed discussion of the fate and transport modeling is discussed in section 3.5.

During the post-closure monitoring period, the results of each sampling event will be reviewed after each event and a Monitoring Report will be prepared and submitted to the NYSDEC. These reviews will serve to evaluate and confirm that the existing monitoring locations and frequency are adequate. The results of the groundwater data will be placed on a table containing similar data collected since the beginning of this project. Detections of VOC compounds will be graphed on a chart comparing concentration versus time. The results will be used to determine if any statistically significant increases in concentration are occurring in any particular well, or if there is an indication that the residual VOCs are migrating beyond the MCA. Increases will be considered statistically significant if results that exceed the 95% upper confidence interval in comparison to the most recent eight quarters of post-closure data for a particular well are observed for two consecutive monitoring events.

If such an increase is observed, NYSDEC will be notified and, if deemed necessary, a meeting will be set up to discuss and agree upon next steps. Prior to the meeting, another round of samples will be collected from the well(s) that showed a potential change. This data will be used when discussing with NYSDEC the appropriate measures to be taken.

3.3 MONITORING QUALITY ASSURANCE/QUALITY CONTROL

All sampling and analyses will be performed in accordance with the requirements of the Site Sampling Plan (Appendix IV).

3.4 MONITORING REPORTING REQUIREMENTS

Forms and any other information generated during regular monitoring events and inspections will be kept on-site, the originals will be maintained in a project file kept by Kleinfelder or other designated Post Remediation Qualified Environmental Professional(s). Copies of the completed forms, and other relevant reporting formats used during the monitoring/inspection events and the monitoring results, will be submitted to NYSDEC at the time of the Periodic Review Report (PRR), as specified in this SMP.

The monitoring results will be reported to NYSDEC annually as part of the PRR. In addition to the PRR, a letter report will also be prepared subsequent to each sampling event. The report (or letter) will include, at a minimum:

- Date of event;
- Personnel conducting sampling;
- Description of the activities performed;
- Type of samples collected (e.g., groundwater, vapor, indoor air, outdoor air, etc.);
- Copies of all field forms completed (e.g., well sampling logs, chain-of-custody documentation, etc.);
- Sampling results compared to appropriate standards/criteria;
- A figure illustrating sample type and sampling locations;
- Copies of all laboratory data sheets and the required laboratory data deliverables required for all samples (these can also be submitted electronically to NYSDEC in an acceptable format);
- Any observations, conclusions, or recommendations;
- A determination as to whether groundwater conditions have changed since the last reporting event; and
- A copy of the data will also be provided in a digital format.

3.5 FATE AND TRANSPORT MODELING

As specified in DER-10, statistically validated and properly calibrated 3-D contaminant fate and transport modeling will be presented at the end of the initial two year post-closure monitoring phase. An appropriate modeling program will be selected at the end of the two year sampling program. The goal is to demonstrate whether the plume has reached a stable length and depth beyond which it is unlikely to expand. Currently it is anticipated that an analytical model will be used although a numerical computer based model may be required depending upon the complexity of the post remedial flow gradients and impact distributions. Typically analytical models such as BIOSCREEN

are used for uncomplicated contaminant transport calculations. If the post-closure monitoring indicates that there are complicated vertical flow gradients and multiple areal flow directions, a more substantial numerical model such as MODFLOW may be used.

3.6 INDOOR AIR QUALITY

Currently, an active Aboveground Storage Tank (AST) used to store Methylene Chloride is located inside Building #3, above the MCA. The AST is used in the on-Site manufacturing processes. Accordingly, OSHA indoor air quality thresholds apply to any potential indoor air exposures. The presence of this tank is expected to render ineffective any indoor air monitoring program whose objective is to determine if Methylene Chloride vapors from the underlying MCA are present at levels of potential concern inside Building #3 as a result of groundwater conditions.

UCB has developed and implemented a Methylene Chloride Management Plan (MCMP), dated July 2006 in accordance with 29 CFR 1910.1052. The MCMP applies to all UCB employees at this Site who are exposed or potentially exposed to Methylene Chloride, its solutions, and materials that release Methylene Chloride. UCB has historically collected air samples from within the building. The historic air samples indicate that Methylene Chloride concentrations inside Building #3 do not exceed the applicable OSHA limits.

If, before the unrestricted use cleanup criteria have been achieved in the MCA, UCB empties, removes from service and properly decommissions the Methylene Chloride AST, and if UCB removes Methylene Chloride from the tank and associated piping and equipment and removes all potential contributing sources of Methylene Chloride to the indoor air from production/operation areas in Building 3, the potential for vapor intrusion will be re-evaluated applying NYSDOH vapor intrusion guidance. If based on the results of the investigation NYSDEC or NYSDOH requires mitigation measures to address vapor intrusion risks, such measures will be installed. This may consist of either a combination of sub-slab and indoor air monitoring for Methylene Chloride, or the installation of an effective sub-slab depressurization system under the MCA portion of Building 3.

3.7 WASTE MATERIALS

Waste, which will include used PPE and disposable sampling materials, generated from the MCA during the Post-closure monitoring period will be containerized and disposed off-Site at an appropriately permitted facility via coordination with the Facility's Health and Safety Officer and Department.

3.8 MONITORING WELL REPAIRS, REPLACEMENT AND DECOMMISSIONING

If biofouling or silt accumulation occurs in the monitoring wells, the wells will be physically agitated/surged and redeveloped. Additionally, monitoring wells will be properly decommissioned and replaced (as per the Monitoring Plan), if an event renders

the wells unusable. If NYSDEC approves a request to close one or more wells, the wells will be properly decommissioned. Repairs and/or replacement of wells in the monitoring well network will be performed based on assessments of structural integrity and overall performance.

The NYSDEC will be notified prior to any repair or decommissioning of monitoring wells for the purpose of replacement. The repair or decommissioning and replacement process will be documented in the subsequent periodic report. Well decommissioning without replacement will be done only with the prior approval of NYSDEC. Well decommissioning will be performed in accordance with NYSDEC's CP-43: Commissioner Policy on Groundwater Monitoring Well Decommissioning (November 2009, or most recent version). Monitoring wells that are decommissioned because they have been rendered unusable will be reinstalled in the nearest available location, unless another location is approved by the NYSDEC.

3.9 DECOMMISSIONING OF THE MPRS AND PORTIONS OF THE MONITORING WELL SYSTEM

Approval was granted by the NYSDEC (via email correspondence dated July 29, 2010) to terminate system operation following the July 2010 operational period. Decommissioning of the MPRS, which will eventually be done, will involve removing the equipment associated with the treatment system. Whenever possible, equipment will be salvaged for future use. Equipment and components deemed to have no salvage value will be properly disposed. Any underground piping between the wells and the MPRS building have been emptied, disconnected, filled with a grout slurry mix, sealed with end caps and abandoned in place. Any pipes no longer of service that were protruding from the ground have been appropriately abandoned and cut off to below grade.

All well abandonment activities were completed in August and September of 2010, as approved in NYSDEC email correspondence dated July, 29 2010.

Vaults housing wells have been removed, the void space has been filled with clean fill and asphalt has been placed above the former vault to match the surrounding asphalt surface of the parking lot. Eight existing vaults and wells have been abandoned: MW-20A, MW-20B, MW-21, MW-22, MW-D11, EXSB-1, EXSB-2 and MW-19.

As discussed in section 1.4.4. the following wells and piezometers are no longer used and have been abandoned in accordance with NYSDEC requirements.

- In the shallow zone: MW-10, MW-11, MW-14, MW-15, MW-19, RW-2, P-1S, P-4S and P-6S.
- In the intermediate zone: MW-20A, MW-20B, MW-21, MW-22, EXSB-1, EXSB-2, P-3I, P-5I and P-7I.
- In the deep zone: MW-D1, MW-D2, MW-D3, MW-D4, MW-D5, MW-D1 and P-2D.

The flush mounted protective casings of the properly abandoned wells have been removed and backfilled with clean fill. Abandoned wells located in asphalted areas have been patched over to match the surrounding asphalt.

Wells used for the proposed post closure monitoring program will be properly abandoned after monitoring is no longer required.

4.0 INSPECTIONS AND NOTIFICATIONS

4.1 INSPECTIONS

A comprehensive site-wide inspection will be periodically conducted. The first inspection and report will be submitted at the end of the initial 18 month Post Closure period (March 2012) and then annually thereafter, regardless of the frequency of the Periodic Review Report. The inspections will determine and document the following:

- Compliance with requirements of this SMP and the Deed Restriction;
- Sampling and analysis of groundwater during monitoring events;
- Whether the results of the Post Closure Monitoring indicates the plume is stable;
- Whether site records required by this SMP are complete and up to date; and
- Changes, or needed changes, to the monitoring system.

Inspections will be conducted in accordance with the procedures set forth in the Monitoring Plan of this SMP (Section 4.2). The reporting requirements are outlined in the Periodic Review Reporting section of this Plan (Section 4.4).

Site-wide inspections will be performed on a regular schedule at a minimum of once before the end of the initial 18 months and thereafter at least once a year. The purpose of these inspections will be to assess the following:

- Visually inspect the apparent integrity of the monitoring wells;
- Compliance with all ICs, including site usage;
- General site conditions at the time of the inspection;
- The site management activities and other requirements of this SMP are being conducted including, where appropriate, confirmation sampling and health and safety inspections; and
- Confirm that site records are up to date.

The well integrity portion of the inspections will also be performed after any severe weather conditions that may affect monitoring wells.

4.2 NOTIFICATIONS

Until such time that the MCA achieves the Site-specific RAOs, the following notifications will be submitted by the property owner to the NYSDEC as needed for the following reasons:

- 60-day advance notice of any proposed changes in MCA use if required under the terms of the VCA, 6 NYCRR Part 375, and/or Environmental Conservation Law.
- 15-day advance notice of any proposed ground-intrusive activities within the MCA pursuant to the Excavation Work Plan.
- To the extent relevant to the MCA, follow-up status reports on actions taken to respond to any emergency event requiring ongoing responsive action shall be submitted to the NYSDEC within 45 days.

Until such time as the Site-specific RAOs are achieved for the MCA, any change in the ownership of the Site or the responsibility for implementing this SMP must be preceded by the following notifications:

- At least 60 days prior to the change, the NYSDEC will be notified in writing of the proposed change. This will include a certification that the prospective purchaser has been provided with a copy of the VCA and all approved work plans and reports, including this SMP and the Deed Restriction.
- Within 15 days after the transfer of the portion of the Site which includes the MCA, the new owner's name, contact representative, and contact information will be confirmed to NYSDEC in writing.

4.3 CERTIFICATION OF INSTITUTIONAL CONTROLS

After the last inspection of the reporting period a Qualified Environmental Professional or Professional Engineer licensed to practice in New York State will prepare the certification below if engineering controls or monitoring components are still required. If engineering controls or monitoring components are no longer required, then the certification may be made by the site owner.

For each institutional control identified for the site, I certify that all of the following statements are true:

- The institutional control employed at the MCA portion of this Site is unchanged from the date the control was put in place, or last approved by the Department.
- Nothing has occurred that would impair the ability of the control to protect the public health and environment.
- Nothing has occurred that would constitute a violation or failure to comply with any Site Management Plan for this control.

- Access to the MCA portion of the Site will continue to be provided to the Department to evaluate the remedy, including access to evaluate the continued maintenance of the institutional controls specified in this SMP.
- The information presented in this report is accurate and complete.
- Use of the site is compliant with the Deed Restriction.

If any of the above statements cannot be made, an explanation, a description of the corrective action(s) being undertaken to rectify the issue and an estimate of the date when the problem will be fully corrected must be included in the Report. Further, the following certification must be made and signed by the Owner/Owner's designated Site Representative.

I certify that all information and statements in this certification form are true. I understand that a false statement made herein is punishable as a Class "A" misdemeanor, pursuant to Section 210.45 of the Penal Law. I, [name], of [business address], am certifying as [Owner or Owner's Designated Site Representative] (If the site consists of multiple properties I have been authorized and designated by all site owners to sign this certification for the site.

4.4 PERIODIC REVIEW REPORT

A Periodic Review Report will be submitted to the Department every year, beginning eighteen months after remedial closure is issued. In the event that the site is subdivided into separate parcels with different ownership, a single Periodic Review Report will be prepared that addresses the MCA portion of the Site. The report will be prepared in accordance with the Revised Draft NYSDEC DER-10 and submitted within 45 days of the end of each certification period. Media sampling results are to be appended to the Periodic Review Report.

The Report will include:

- Identification, assessment and certification of institutional controls required by the remedy for the MCA portion of the Site;
- Results of the required annual site inspections and severe condition inspections, if applicable to the MCA portion of the Site;
- All applicable inspection forms and other records generated for the MCA portion of the Site during the reporting period;
- A summary of any discharge monitoring data and/or information generated during the reporting period in connection with the MCA portion of the Site with comments and conclusions;

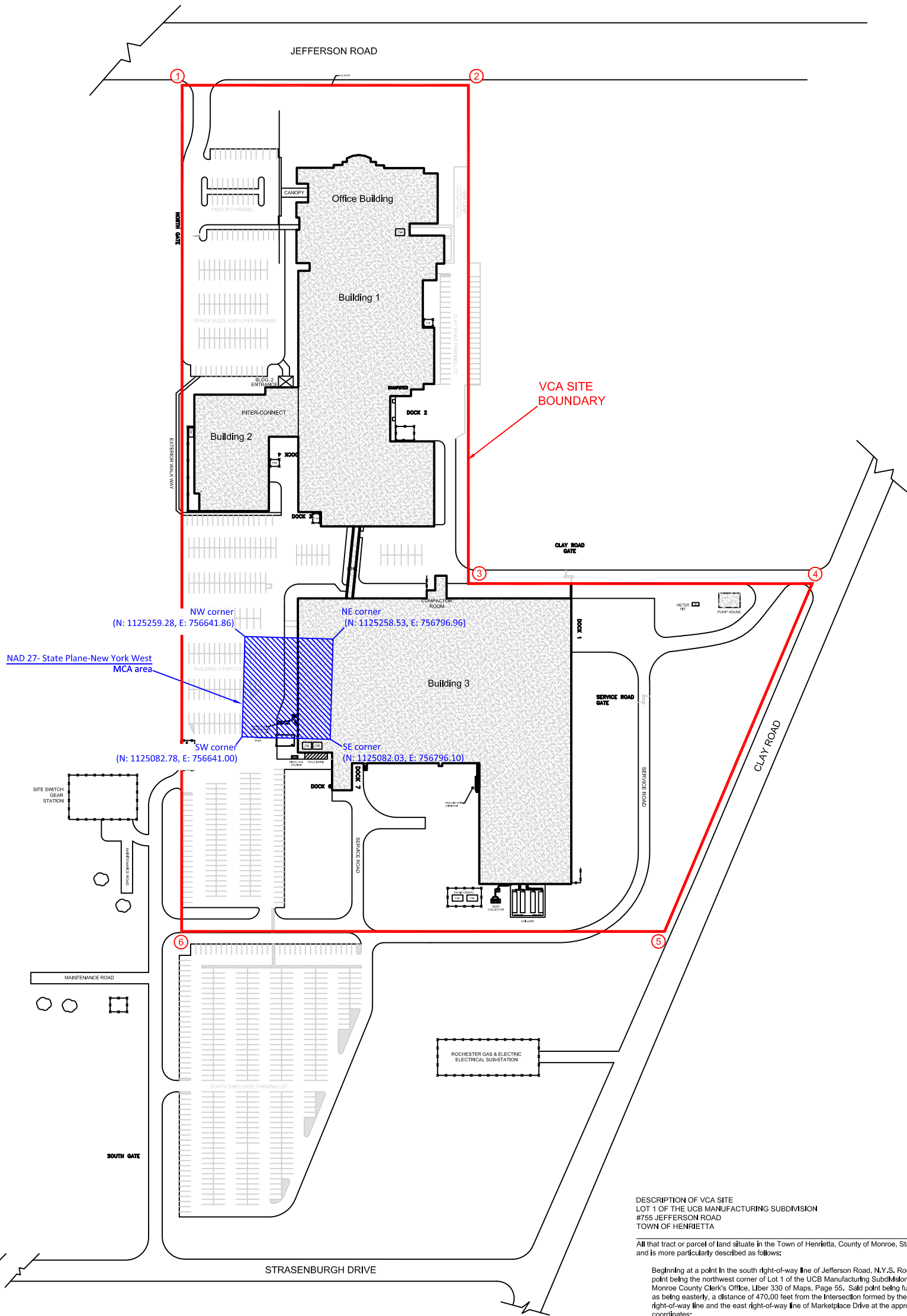
- Data summary tables and graphical representations of contaminants of concern by media (groundwater, soil vapor) in connection with the MCA portion of the Site, which include a listing of all compounds analyzed, along with the applicable standards, with all exceedances highlighted. These will include a presentation of past data as part of an evaluation of contaminant concentration trends;
- Results of all same analyses from the MCA portion of the Site, copies of all laboratory data sheets, and the required laboratory data deliverables for all samples collected during the reporting period;
- A Site evaluation, which includes the following in connection with the MCA portion of the Site:
 - Compliance with this Site Management Plan and the Deed Restriction;
 - Any new conclusions or observations regarding the MCA portion of the Site based on inspections or data generated by the Post Closure Monitoring Plan;
 - Recommendations regarding any necessary changes to the remedy and/or Post Closure Monitoring Plan in connection with the MCA portion of the Site; and
 - The overall performance and effectiveness of the remedy in connection with the MCA portion of the Site.

The Periodic Review Report will be submitted in hard copy and electronic format to the NYSDEC Regional Office and in electronic format the NYSDOH Bureau of Environmental Exposure Investigation.

4.5 CORRECTIVE MEASURES PLAN

If any component of the remedy in connection with the MCA portion of the Site is found to have failed, or if the periodic certification cannot be made due to the failure of an institutional control, a Corrective Measures Plan will be submitted to the NYSDEC for approval. This Plan will explain the failure and provide the details and schedule for performing work necessary to correct the failure. Unless an emergency condition exists, no work will be performed pursuant to the Corrective Measures Plan until it is approved by the NYSDEC.

FIGURES



DESCRIPTION OF VCA SITE
 LOT 1 OF THE UCB MANUFACTURING SUBDIVISION
 #755 JEFFERSON ROAD
 TOWN OF HENRIETTA

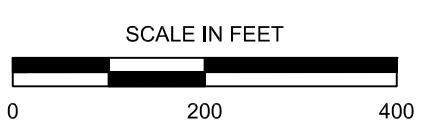
All that tract or parcel of land situate in the Town of Henrietta, County of Monroe, State of New York and is more particularly described as follows:

Beginning at a point in the south right-of-way line of Jefferson Road, N.Y.S. Route 252, said point being the northwest corner of Lot 1 of the UCB Manufacturing Subdivision, filed in the Monroe County Clerk's Office, Liber 330 of Maps, Page 55. Said point being further described as being easterly, a distance of 470.00 feet from the intersection formed by the aforesaid south right-of-way line and the east right-of-way line of Marketplace Drive at the approximate following coordinates:

- Thence, 1 - N 88-44'-44" E, along the south right-of-way line of Jefferson Road, N.Y.S. Route 252, a distance of 550.00 feet to a point.
- Thence, 2 - S 01-15'-16" E a distance of 800.00 feet to a point.
- Thence, 3 - N 88-44'-44" E a distance of 286.01 feet to a point.
- Thence, 4 - S 01-15'-16" E a distance of 762.72 feet to a point.
- Thence, 5 - S 87-49'-44" W a distance of 858.06 feet to a point.
- Thence, 6 - N 01-15'-16" W a distance of 1573.11 feet to the point and place of beginning.

Intending to describe "VCA Site" within Lot 1 of the UCB Manufacturing Subdivision, which contains 40,153 acres, #755 Jefferson Road, Town of Henrietta.

Site Information
 The four-building site covers approximately 40 acres.
 Office Building (Building 0) - 115,000 sq. ft.
 Building 1 181,300 sq. ft.
 Building 2 31,000 sq. ft.
 Building 3 176,000 sq. ft.



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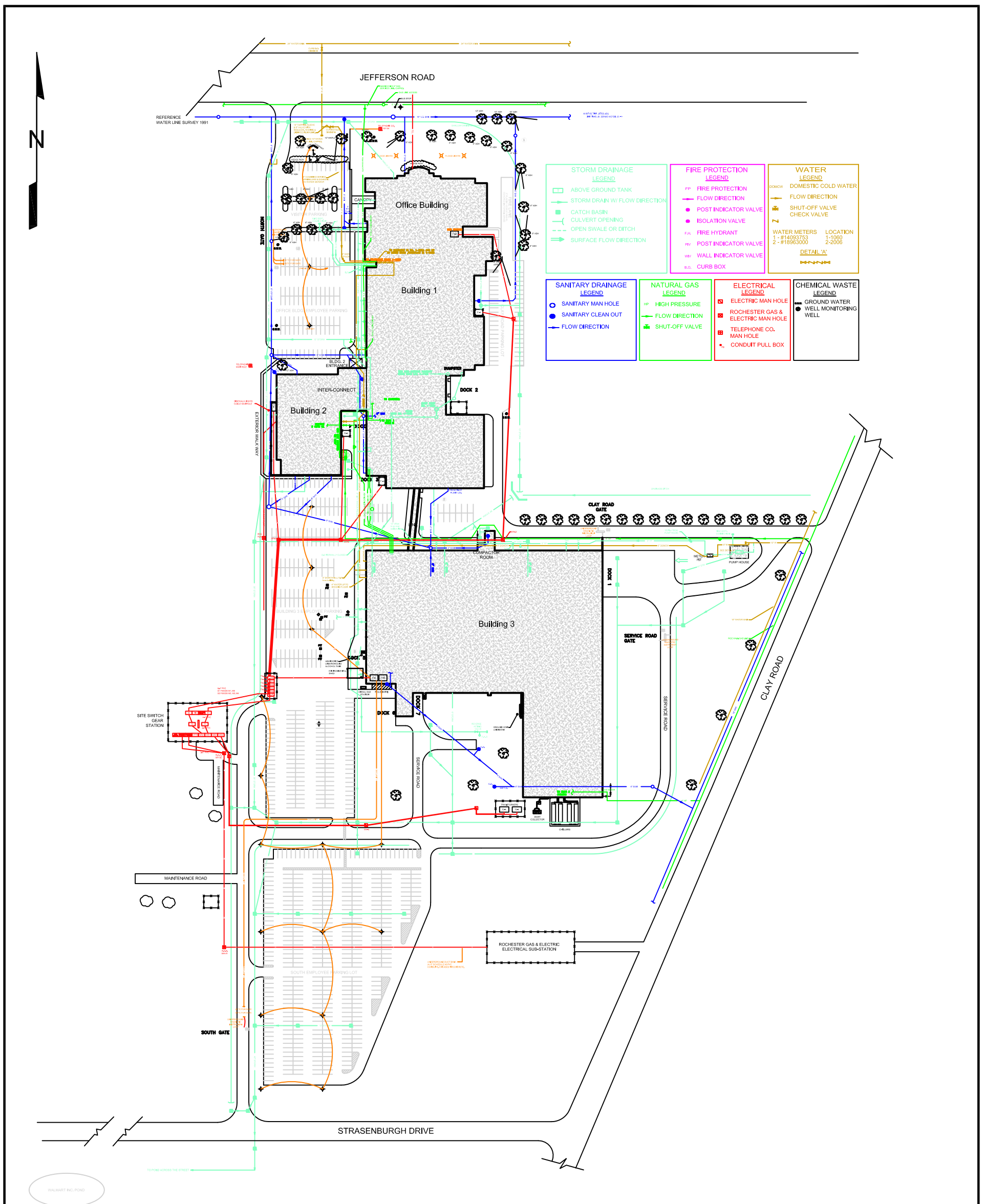


PROJECT NO.	109794
DRAWN:	JUN 2011
DRAWN BY:	TB
CHECKED BY:	
FILE NAME:	SANOFIBM_FEB11.dwg

PROPERTY DIAGRAM

UCB MFG. PHARMACEUTICALS
 755 JEFFERSON ROAD
 ROCHESTER, NEW YORK

FIGURE
1



Site Information
 The four-building site covers approximately 40 acres.
 Office Building (Building 0) - 115,000 sq. ft.
 Building 1 - 181,300 sq. ft.
 Building 2 - 31,000 sq. ft.
 Building 3 - 176,000 sq. ft.

Sanitary Sewage System
 A publicly owned treatment works, owned and operated by the Monroe County Division of Pure Waters, collects and conveys waste water from the facility to the Frank E. Van Lare Waste Water Treatment Plant located on Lake Ontario, north of the city of Rochester. Waste water from the facility includes process and laboratory waste, and domestic sewage from toilet facilities and cafeteria.

Storm Water Drainage
 The general storm water drainage pattern is east to west, via storm drains and over ground flow, to a drainage swale and catch basins along the west property line. These westerly catch basins drain south to a single culvert which discharges into a pond on the adjacent property to the southwest. The facility, to date, maintains a New York State Department of Environmental Conservation State Pollutant Discharge Elimination System (SPDES) Baseline Industrial Storm Water Permit No. NYR00C641.

Domestic Water and Fire Protection System
 The Town of Henrietta provides public water to the facility. The site has connections to both Jefferson Road and Clay Road water mains. The fire protection mains are connected from both supplies with sectional control valves. There is a 6-inch domestic water line from each connection. A diesel powered fire pump exists at the Clay Road connection in order to increase fire fighting capacity to Building 3.

Natural Gas
 Gas supplies are purchased from an independent supplier, but distributed to the plant through pipelines owned and operated by Rochester Gas & Electric Company. The main gas pipeline enters the site on the west side (Clay Road) and travels underground along the north side of Building 3, and enters the facility at the southwest corner of Building 1. Natural gas is used primarily to feed Building(s) boilers.

Electrical Cable
 Electrical Power is supplied by Rochester Gas & Electric Co. From an R.G.E sub-station, underground cable is fed west through the parking lot to Manhole #1 and continues north to Manhole #2 before it connects to the 34.5 KV Switch Yard. From there it discharges to several Transformers located throughout the facility. In most cases through Electrical Man Holes.

Note E1: 3-#10, 1-#10 EG, 1" C used for underground cable for Parking Lot Lights and Company Sign, Lighting Panel LP-2 located in Utility Closet 0-1008, located on ground floor of the Office Building.
 Note E2: (1) 1" conduit and (1) 2" conduit exists underground for each Security Gate.

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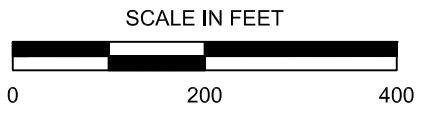


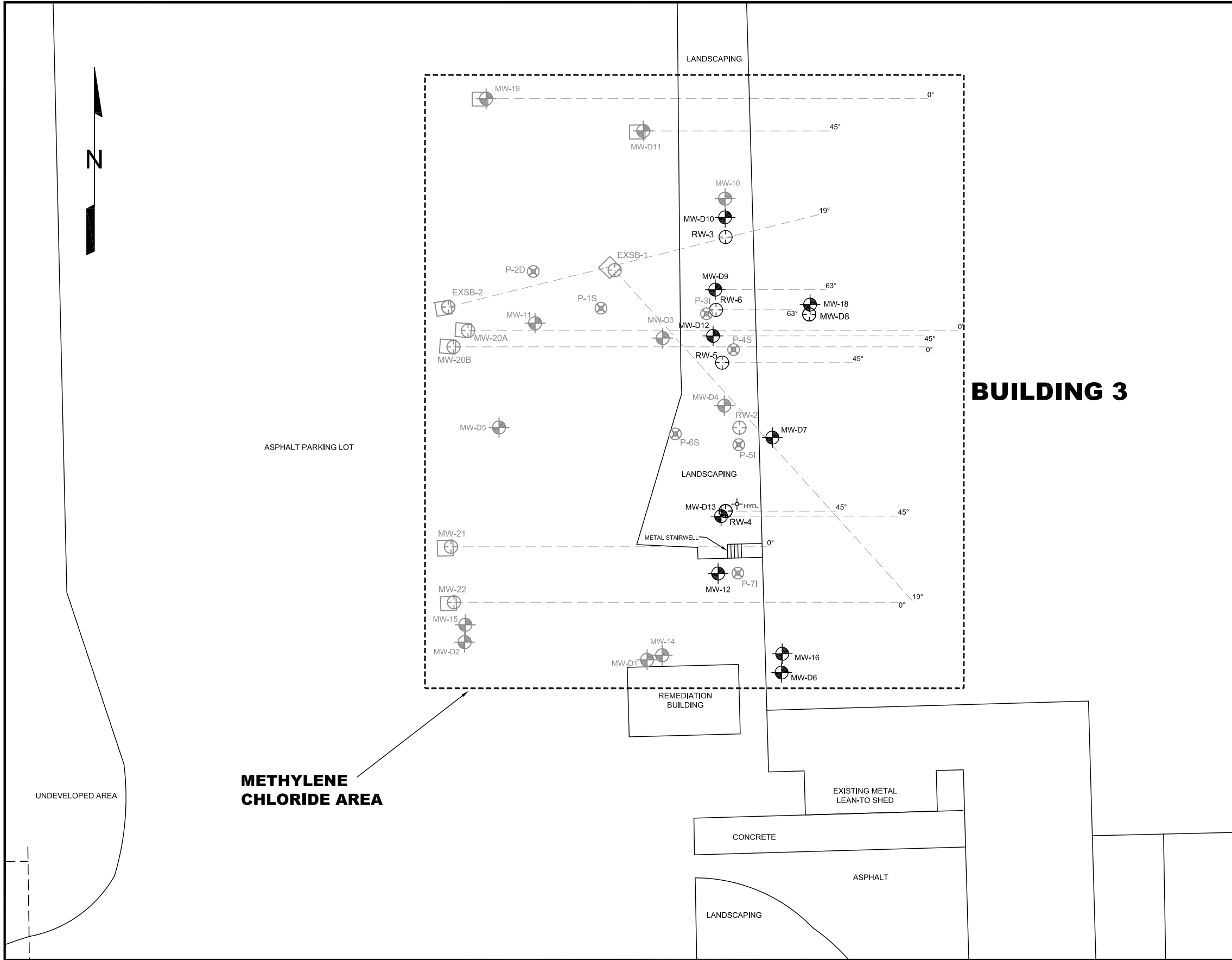
PROJECT NO.	109794
DRAWN:	JUN 2011
DRAWN BY:	TB
CHECKED BY:	
FILE NAME:	SANOFIBM_FEB11.dwg

UTILITY PLAN

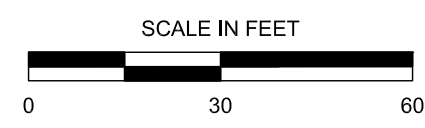
UCB MFG. PHARMACEUTICALS
 755 JEFFERSON ROAD
 ROCHESTER, NEW YORK

FIGURE
1A





LEGEND	
	MONITORING WELL
	RECOVERY WELL
	PIEZOMETER
	ABANDONED MONITORING WELL
	ABANDONED RECOVERY WELL
	ABANDONED PIEZOMETER
	ABANDONED VAULT
	FIRE HYDRANT
	ANGLED WELL (ANGLE MEASURED FROM GROUND SURFACE)



NEWBURGH, NY

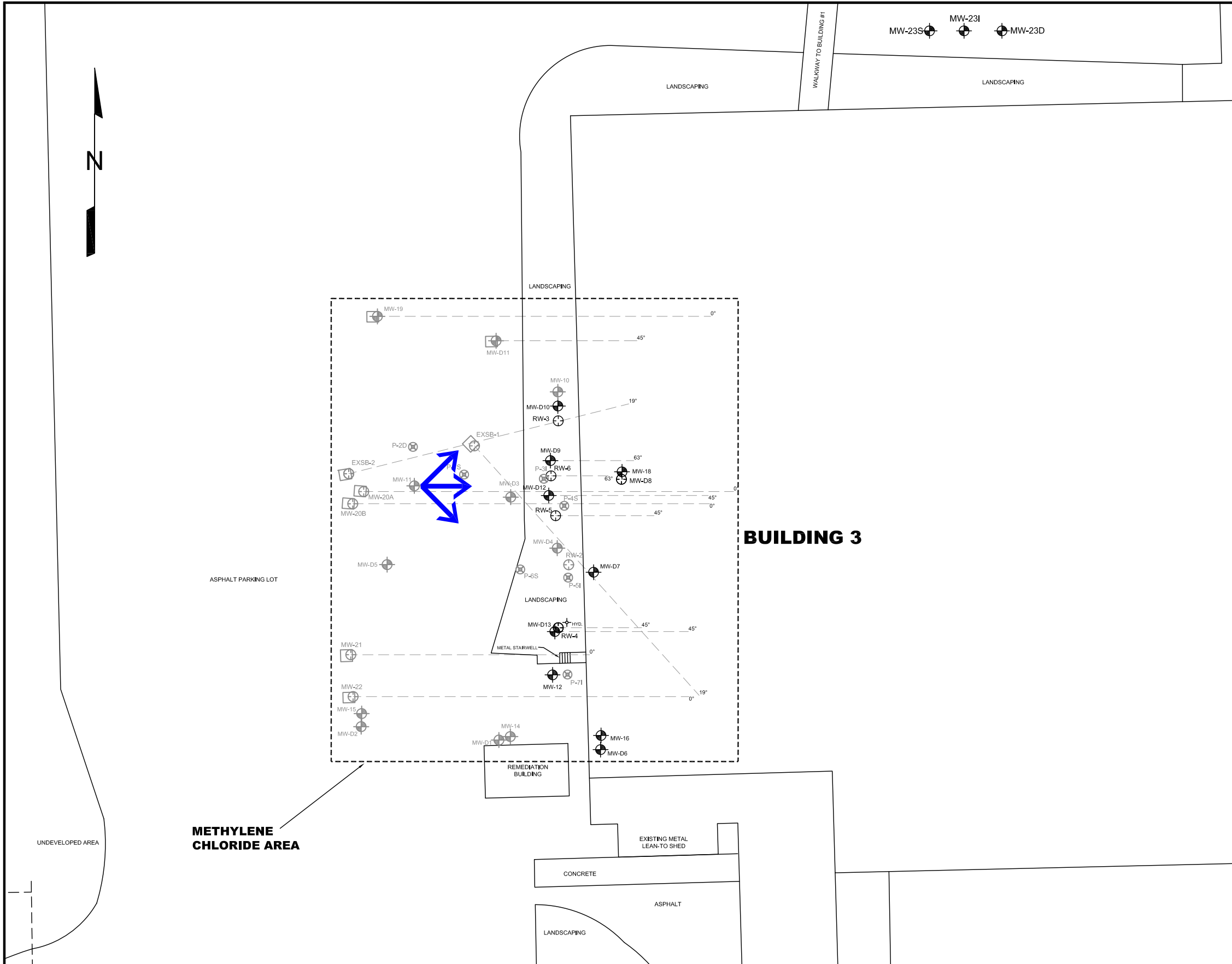
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- REFERENCES:
- "WELL LOCATION MAP" PREPARED BY ERM, DATED SEPTEMBER, 2006.
 - KLEINFELDER FIELD RESEARCH.

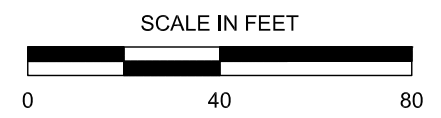


PROJECT NO.	105651
DRAWN:	02/09/11
DRAWN BY:	CTH
CHECKED BY:	AW
FILE NAME:	SANOI_FEB11.dwg

METHYLENE CHLORIDE AREA		FIGURE
UCB FACILITY NYSDEC VCP# V00126-8 755 JEFFERSON ROAD ROCHESTER		2
MONROE COUNTY	NEW YORK	



LEGEND	
	MONITORING WELL
	RECOVERY WELL
	PIEZOMETER
	ABANDONED MONITORING WELL
	ABANDONED RECOVERY WELL
	ABANDONED PIEZOMETER
	ABANDONED VAULT
	FIRE HYDRANT
	ANGLED WELL (ANGLE MEASURED FROM GROUND SURFACE)
	GROUNDWATER FLOW DIRECTION



NEWBURGH, NY

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- REFERENCES:
1. "WELL LOCATION MAP" PREPARED BY ERM, DATED SEPTEMBER, 2006.
 2. KLEINFELDER FIELD RESEARCH.

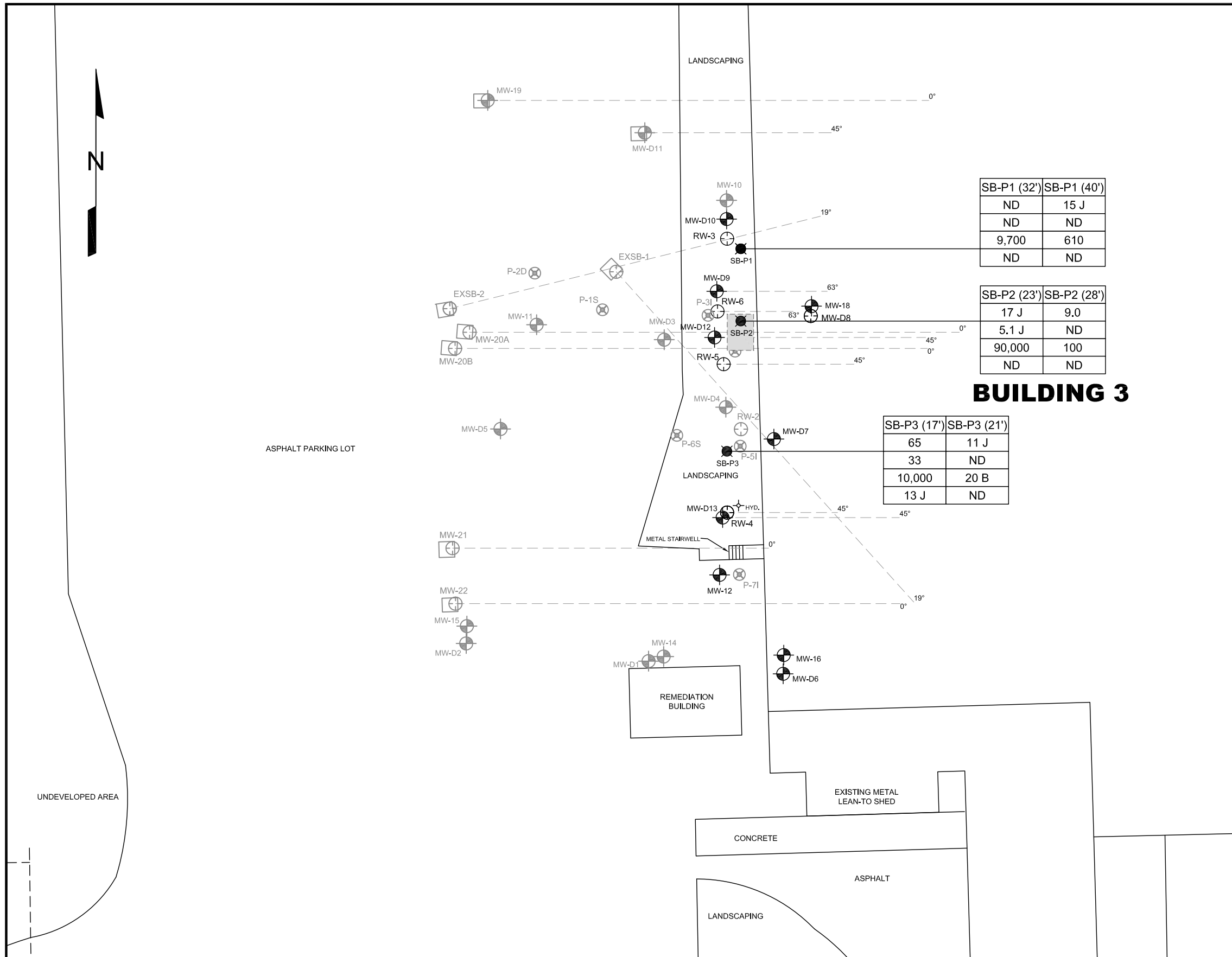
PROJECT NO.	105651
DRAWN:	02/09/11
DRAWN BY:	CTH
CHECKED BY:	AW
FILE NAME:	SANOI_FEB11.dwg

GROUNDWATER FLOW DIRECTION PLAN

UCB FACILITY
 NYSDEC VCP# V00126-8
 755 JEFFERSON ROAD
 ROCHESTER

MONROE COUNTY NEW YORK

FIGURE
3



SB-P1 (32')	SB-P1 (40')
ND	15 J
ND	ND
9,700	610
ND	ND

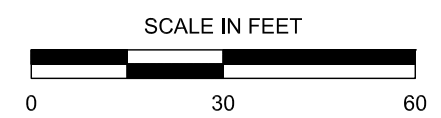
SB-P2 (23')	SB-P2 (28')
17 J	9.0
5.1 J	ND
90,000	100
ND	ND

SB-P3 (17')	SB-P3 (21')
65	11 J
33	ND
10,000	20 B
13 J	ND

LEGEND

- MONITORING WELL
 - RECOVERY WELL
 - PIEZOMETER
 - ABANDONED MONITORING WELL
 - ABANDONED RECOVERY WELL
 - ABANDONED PIEZOMETER
 - ABANDONED VAULT
 - FIRE HYDRANT
 - ANGLED WELL (ANGLE MEASURED FROM GROUND SURFACE)
 - SOIL BORING
 - FORMER MeCl AST LOCATION (APPROXIMATE)
- | SB-P3 (17') | SAMPLE ID (VERTICAL DEPTH OF SAMPLE) |
|-------------|--------------------------------------|
| 65 | ACETONE (µg/kg) |
| 33 | CARBON DISULFIDE (µg/kg) |
| 10,000 | METHYLENE CHLORIDE (µg/kg) |
| 13 J | 2-BUTANONE (µg/kg) |
- ND NOT DETECTED ABOVE LABORATORY REPORTING LIMITS
 - J ESTIMATED VALUE

NOTE:
 1. ONLY COMPOUNDS ABOVE SITE-SPECIFIC OR NYSDEC STANDARDS ARE INDICATED ON THE FIGURE.



NEWBURGH, NY

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 - KLEINFELDER FIELD RESEARCH.



PROJECT NO. 105651
 DRAWN: 02/09/11
 DRAWN BY: CTH
 CHECKED BY: AW
 FILE NAME: SANOFI_FEB11.dwg

SOIL BORING PLAN

UCB FACILITY
 NYSDEC VCP# V00126-8
 755 JEFFERSON ROAD
 ROCHESTER
 MONROE COUNTY NEW YORK

FIGURE
4

TABLES

**Table 1
SOIL ANALYTICAL DATA**

Sanofi Aventis

December 22, 2010 through January 3, 2011

SAMPLE ID		SB-P1 (32)	SB-P1 (40)	SB-P2 (32)	SB-P2 (40)	SB-P3 (24)	SB-P3 (30)
SAMPLE DEPTH (fbg)		32	40	32	40	24	30
SAMPLE DATE							
PARAMETER	NYSDEC UUSCOs or Site- Specific Standard	12/22/2010	12/22/2010	12/23/2010	12/23/2010	1/3/2011	1/3/2011
1,1-Dichloroethene	270	<110	<5.4	<5.4	<5.6	<5.4	<5.4
Methyl Ethyl Ketone	120	<540	<27	<27	<28	13 J	<27
Acetone	50	<540	15 J	17 J	9.0	65	11 J
Benzene	60	<110	<5.4	<5.4	<5.6	<5.4	<5.4
Carbon disulfide	~	<110	<5.4	5.1 J	<5.6	33	<5.4
Chloroform	370	<110	<5.4	<5.4	<5.6	<5.4	<5.4
Chloromethane	~	<110	<5.4	<5.4	<5.6	<5.4	<5.4
cis-1,2-Dichloroethene	250	<110	<5.4	<5.4	<5.6	<5.4	<5.4
Dichlorodifluoromethene	~	<110	<5.4	<5.4	<5.6	<5.4	<5.4
Ethyl Acetate	~	<110	<5.4	<5.4	<5.6	<5.4	<5.4
Methylene Chloride	26	9700	610	90000	100 B	10000	20 B
trans-1,2-Dichloroethene	20	<110	<5.4	<5.4	<5.6	<5.4	<5.4
Xylenes, total	260	<210	<11	<11	<11	<11	<11

Notes:

All concentrations are presented in micrograms per kilogram (µg/kg).

fbg - feet below grade

Shading - Reported concentration detected above the applicable standard(s) or guidance value(s).

J - Result is less than the RL but greater than or equal to the MDL and the concentration is an approximate value.

B - Analyte found in the associated blank, as well as in the sample.

UUSCO - Unrestricted Use Soil Cleanup Objectives

APPENDICES

APPENDIX I

Annotated New York State Department of Environmental Conservation Site Management Plan Checklist for BCP, SMP, SSF, and VCP Sites

**Site Management Plan (SMP) Checklist
for BCP, ERP, SSF and VCP sites**

Site Name: 755 Jefferson Road Facility

Location: Henrietta, NY

Site No.: VCP: V00126-8

Project Manager: Rick Bethel, Quantum Management Group

The SMP for a site remedial program must include at a minimum an Institutional and Engineering Control Plan as well as provision for the periodic certification of the institutional control and engineering controls (IC/EC certification) and may include, as required by the remedy, a Site Monitoring Plan and Operation & Maintenance Plan. Each of these individual areas of reporting will need to meet the minimum requirements detailed below.

The SMP being reviewed addresses:

- The entire site (**All known areas of concern**)
- An operable unit of the site identified as: _____
- An IRM for operable unit ___ identified as _____
- A groundwater restriction or short term engineering control for an otherwise unrestricted use site

The SMP period for this site, after an initial 18 month review, will be:

- Annually** **Every 3 years** **Every 5 years** **Every 10 years**

Institutional and Engineering Control Plan:

- Must include a complete description of all institutional and/or engineering controls employed at the site, including the mechanisms that will be used to continually implement, maintain, monitor, and enforce such controls both by the applicant, the applicant's successors and assigns, and by state or local government is presented.
- Appropriate plans for implementation of the engineering and institutional controls, such as for handling soils removed from beneath a soil cover or cap during maintenance or redevelopment of the site. This includes media-specific implementation plans, such as plans for:
 - Soil management which detail procedures for handling soil excavated from below a soil cover or cap during maintenance or redevelopment of the site (e.g., a soils management plan); or
 - Installation/operation of sub-slab vapor depressurization systems, or other types of systems to address vapor intrusion;
 - Engineering control inspection plans, for the remedy as implemented or to be installed as part of the site development, such as for a cap or cover system.

- x A periodic review report which includes the IC/EC certification as well as all other reporting of the IC/ECs, site monitoring and/or operation and maintenance of the remedy.

Institutional Control and Engineering Control (IC/EC) Certification: The applicant or site owner must make a periodic certification of the IC/EC to the Department. The requirements of this periodic IC/EC certification will be described in the SMP and the certification must be included in the periodic review report, which is prepared and submitted for the Department-approved certification period. The IC/EC certification will clearly identify the periodic review period and certify that:

- x The institutional controls and/or engineering controls employed at such site are:
 - unchanged from the date the control was put in place, unless otherwise approved by the Department;
 - in place and effective;
 - performing as designed;
 - nothing has occurred that would impair the ability of the controls to protect the public health and environment; and
 - nothing has occurred that constitutes a violation or failure to comply with any operation and maintenance plan for such controls.
- Use of the site complies with the deed restriction.
- x Access to the site will be provided to the Department to evaluate the remedy and verify continued maintenance of such controls.
- x If a financial assurance mechanism is required, the mechanism remains valid and sufficient for the intended purpose.

If the remedy requires only institutional controls, the certification may be made by the property owner. If the remedy includes engineering controls, the certification must be made by a qualified environmental professional or, if engineering evaluations are required, a licensed professional engineer.

- For BCP sites: For those sites determined to be non-significant threat sites, but where contaminants in groundwater contravene drinking water standards at the site border, in addition to the items noted above; the remedial party will also have to certify:
 - That no new information has come to the site owner`s attention, including groundwater monitoring data from wells located at the site boundary, to indicate that the assumptions made in the qualitative exposure assessment of off-site contamination are no longer valid; and
 - Every five years, that the assumptions made in the qualitative exposure assessment remain valid.

Site Monitoring Plan: Includes, as appropriate for the site remedy, sampling and analysis plans for monitoring groundwater, soil vapor or another media as identified by the decision

document for the site, designed to:

- If none is required for the remedy which is the subject of this SMP, check here.
- Assess the remedy's compliance with groundwater standards.

- Assess the remedy's compliance with the cleanup objectives of any other impacted media.

- Evaluate site information periodically to confirm that the remedy continues to be effective for the protection of public health and the environment.

- Prepare the necessary reports of the results of this monitoring for a period determined by the Department.

Operation & Maintenance Plan: Includes, as appropriate for the site remedy, a plan(s) which:

- If none is required for the remedy which is the subject of this SMP, check here

- Identify the operation and maintenance activities necessary for the continued operation of the components of the remedy, including provision for evaluation of the systems and recommendations to optimize performance.

- Evaluating site information periodically to confirm that the remedy continues to be effective for the protection of public health and the environment.

- Preparing the necessary reports of the results of this evaluation for a period determined by the Department.

For DEC Internal Use Only:

UIS Updates

Remedial Site Information page

Verify/Update Remedial Site Information - Project update guidance for sites descriptions, environmental assessments as well as basis for classification/threat statements may be found at the following internal web address : http://internal/home/der/comp/update.html\\\\cs1-data3\\DATA3\\DER\\eDocs\\DER-General\\DER_Program_Memos.memo.2004-11-08.Project_Updates.pdf

- Site Description**
- Site Environmental Assessment**
- Site Health Assessment:** request from DOH by the DER PM, entered by SCS
- Site Name, Address, & Size:** verify and notify SCS to make adjustments
- View Contacts:** verify that all affiliation information is accurate, up-to-date, and complete
- Agreement/Order Ref. No.** (Cross Refs page link from main site page): enter corresponding identifying reference number.
- Significant threat** (on main page): verify status, contact SCS to make adjustments
- Allowable Use** (on main site page): verify most restrictive use allowed via drop down, entered by SCS

For BCP sites only:

- BCP Clean Up Track** (on main site page for BCP sites): enter track via drop down, selection available in remedial projects only
- Percent En-zone** (via Extra Details link on main site page) verify and/or select via drop down
- BCP Off-Site Status** (enter in the Extra Details link on main site page) select via drop down (for sites with off-site issues)

Projects (confirm status (ACT/PLN) for all projects, especially:

- Remedial Investigation/Design (ACT/ACT)
- Remedial Action (ACT/PLN)
- Certificate of Completion (PLN/PLN)
- Site Management (PLN/PLN)
- Periodic Review (PLN/PLN)

IC/EC Module

- Site Property Information Summary Page**
 - Verify that property information is complete and accurate for all parcels (*see also IGP-8, Reference 7*)
 - Verify that “owner information” is complete and accurate for all parcels
 - Verify that “contact information” is complete and accurate (this will be the certifying party)

□ **Control Details Page**

Add Control information as follows:

- Initial options for Controls will be: Legacy Restriction, Environmental Easement, Other
- ICs - indicate all types used for the site
 - ECs - indicate all types used for the site
 - Control Description - provide a summary of restrictions from the easement/deed restriction language as per IGP-8

Documents required in Edocs

- Agreement/Order/SAC, ROD, SMP (upon approval), and any other appropriate and pertinent documents pertaining to verifying IC/ECs

Completed by: _____ Date: _____
Project Manager

Reviewed by: _____ Date: _____
Section Chief/Regional HWR Engineer

APPENDIX II

Health and Safety Plan



SITE-SPECIFIC HEALTH AND SAFETY PLAN

**SANOFI-AVENTIS
755 JEFFERSON ROAD
ROCHESTER, NEW YORK**

PREPARED BY:

Kleinfelder

KLEINFELDER

SITE SPECIFIC HEALTH AND SAFETY PLAN

**Sanofi-Aventis
755 JEFFERSON ROAD
ROCHESTER, NEW YORK**

**HASP REVISION 1
Revision Date: September 14, 2008**

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II. EMERGENCY CONTACTS	2
III. SITE BACKGROUND INFORMATION (SEE ATTACHED SITE PLAN AND MAP, PAGE 6)	4
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V. CHEMICAL HAZARDS/PPE (ALSO REFER TO KLEINFELDER SITE HEALTH AND SAFETY PROCEDURES SECTIONS 6.0, 7.0 AND 9.0).....	7
VI. PHYSICAL HAZARDS/TRAFFIC CONTROL (REFER TO KLEINFELDER SITE HEALTH AND SAFETY PROCEDURES, SECTION 5.0, 6.0,7.0, AND 8.0)	8
VII. DECONTAMINATION PROCEDURES (ALSO REFER TO KLEINFELDER SITE HEALTH AND SAFETY PROCEDURES SECTION 12.).....	9
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X. HASP REVISIONS/SITE CONDITION CHANGE FORM	12

HASP prepared by:

HASP approval:

Project Manager Approval:

REVISION HISTORY:

06-15-07 Original

Revised 1/19/2010

KLEINFELDER

**SITE HEALTH AND SAFETY PLAN — FOR METHYLENE CHLORIDE
INVESTIGATION/REMEDICATION ONLY**

(For specific Procedures, refer to Kleinfelder's Health and Safety Procedures Manual)

I. PROJECT IDENTIFICATION

Project Name: Sanofi-Aventis Jefferson Road

Address of Site: 755 Jefferson Road Site ID No.: _____
Rochester, New York

Site Contact: Greg Light/Loren Keim Phone: 585-274-5518

Client Contact: Rick Bethel Phone: 513-314-7543

Kleinfelder Project Manager: Alex Wirth Phone: (845) 567-6530

Health and Safety Oversight: Matthew Pickard Phone: (845) 567-6530

II. EMERGENCY CONTACTS

Police: 911 Fire: 911 Ambulance: 911

National Poison Control Center: 800-222-1222

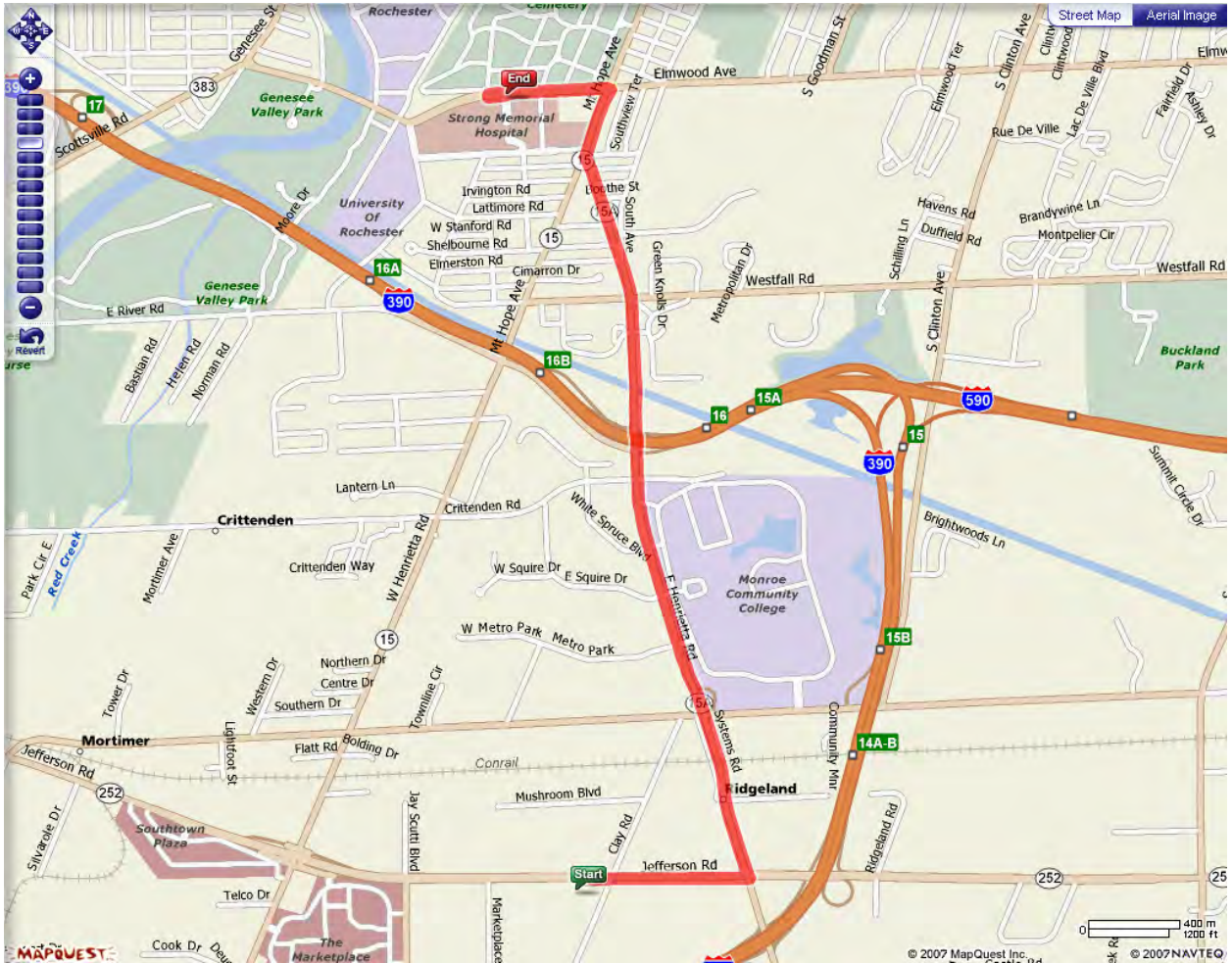
Utilities: Gas 1-800-743-1702 Electric 1-800-743-1701 Water 1-585-442-2009

Phone: 1-585-777-7577 One call/equivalent: 1-800-962-7962

Medical Treatment Facility: Strong Hospital Phone #: (585) 275-2100
Address: 601 Elmwood Avenue
Rochester, New York 14642

Directions from Site: (see attached map showing location of hospital relative to Site)

MAP TO HOSPITAL



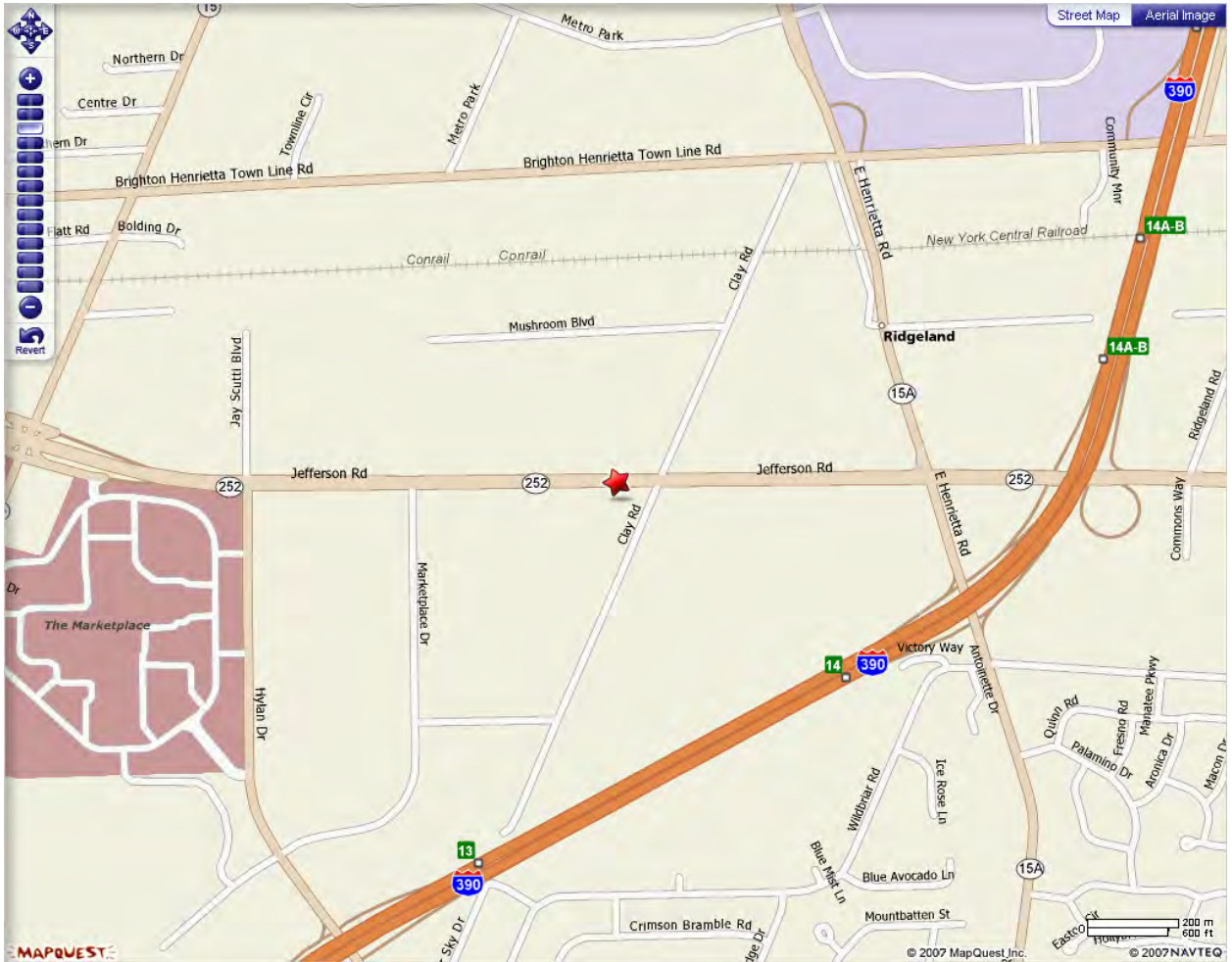
- 1: Start out going EAST on JEFFERSON RD / NY-252 E toward CLAY RD. 0.4 miles
- 2: Turn LEFT onto NY-15A N / E HENRIETTA RD. Continue to follow NY-15A N. 2.4 miles
- 3: Turn SLIGHT RIGHT onto MT HOPE AVE / NY-15. 0.2 miles
- 4: Turn LEFT onto ELMWOOD AVE. 0.3 miles
- 5: Make a U-TURN onto ELMWOOD AVE. <0.1 miles

6: End at 601 Elmwood Ave
Rochester, NY 14642-0001, US

Total Est. Time: 8 minutes Total Est. Distance: 3.59 miles

III. SITE BACKGROUND INFORMATION (See attached Site Plan and map, page 6)

SITE LOCATION



IV. ANTICIPATED TASKS TO BE PERFORMED (Check all appropriate tasks)

Task	Personnel/Contractors Performing Task
<input type="checkbox"/> Supervision of Soil Boring/Monitoring Well Installation	
<input checked="" type="checkbox"/> Gauging/Sampling of Monitoring Well	<u>Kleinfelder Personnel</u>
<input type="checkbox"/> Assessment of Tank Excavation	
<input type="checkbox"/> Supervision of General Construction	
<input type="checkbox"/> Trenching	
<input type="checkbox"/> Dry well excavation	
<input type="checkbox"/> Line replacement	
<input type="checkbox"/> Soil loading and transport, etc.	
<input type="checkbox"/> Other	
<input type="checkbox"/> Collection of Soil Samples	
<input type="checkbox"/> Split spoon	
<input type="checkbox"/> Hand auger	
<input type="checkbox"/> Grab samples	
<input type="checkbox"/> Jar headspace	
<input type="checkbox"/> Sampling Liquids/Sludge	
<input type="checkbox"/> Oil/water separation	
<input type="checkbox"/> Dry well	
<input type="checkbox"/> Drums	
<input type="checkbox"/> Other	
<input checked="" type="checkbox"/> Remedial System Operation & Maintenance	<u>Kleinfelder Personnel assisting Quantum</u>
OTHER: _____	

SITE MAP INSERT

(print out the latest Site Plan and attach behind this sheet)

See Attached

V. CHEMICAL HAZARDS/PPE (also refer to Kleinfelder Site Health and Safety Procedures sections 6.0, 7.0 and 9.0)

Level of PPE Required: D Zones established: NA
 C Support (S2) Decontamination (CRZ)
 B* Ground Intrusive (no eating, drinking smoking) (EZ)

*Level C and B work MAY NOT be done under this HASP. Contact HSO for further direction and assistance!

Specific Site Entry/Access Procedures: If LEL concentrations are >10%LEL, all work must cease and area(s) evacuated.

Potential/Expected Exposure Constituents: (MSDS's are Attached as Appendix)

Contaminant	Source/ Location	Acute Exposure Symptoms	PEL/TLV Established	Action Level	Level of PPE/Specific PPE required
Methylene Chloride (MeCl)		Light-headedness, fatigue, confusion, nausea, vomiting, skin irritation and burn, eye irritation.	PEL 25 ppm	12.5 ppm	< Action Level – Level D > Action Level – Consult PM and HSO

NOTE: IF ANY LEVELS EXCEED THE PEL/TLV BY MORE THAN 10X, ALL WORK MUST CEASE AND SPECIFIC VENTILATION PRACTICES OR RESPIRATORY PROTECTION METHODS EMPLOYED.

Air Monitoring Instruments to be Employed: (also refer to Kleinfelder HASP Manual, section 9.0)

Monitoring Instrumentation To Be Used:(SEE INDIVIDUAL PROCEDURES FOR MONITORING BELOW)

- Combustible Gas Indicator
- Oxygen Meter
- Dual CGI and O2
- Flame Ionization Detector (calibration date:_____)
- Photo Ionization Detector (calibration date:_____)
- Hydrogen Sulfide Detector
- Colorimetric Indicator Tubes
- Personnel Sampling Pump w/ media
- OTHER: _____
- Radiation Survey Meter w/probe
- Particulate Monitor
- Dosimeter Badges

Specific Personnel Air Monitoring Procedures to be employed: Personnel air monitoring samples are to be collected in workers' breathing zone (18"-24" from mouth/nose) using the monitoring instruments specified above. Air monitoring shall be conducted prior to site activities and at least once every 2 hours. Sampling shall be conducted continuously for 15 minutes per collection. Any sustained readings above the action level shall require notification of the Project Manager and Health & Safety Officer.

VI. Physical Hazards/Traffic Control (refer to Kleinfelder Site Health and Safety Procedures, section 5.0, 6.0,7.0, and 8.0)

Hazard Description	Location	Control Methods/ Protective Equipment
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

Confined Space Entry? Y N (If Y, then a completed Confined Space Permit must be attached)

Description: _____

Illumination: ___ Adequate ___ Inadequate (if inadequate, describe illumination methods to be utilized): _____

Hot Work? Y N (If Y, then a Hot Work Permit MUST be completed and attached)

Description: _____

VII. Decontamination Procedures (also refer to Kleinfelder Site Health and Safety Procedures section 12.)

Decontamination required: Personnel? Y N Equipment? Y N

Method of Decontamination/Procedures to be Implemented: _____

Method of disposal for Contaminated Materials: _____

VIII. Training Requirements for Site Personnel (See Kleinfelder Site Health and Safety Procedures, Sect. 10)

In addition to initial site specific health and safety training, all Kleinfelder Project Field Team Members shall be required to be trained in accordance with 29CFR 1910.120, Hazardous Waste Operations and Emergency Response. Any other personnel visiting the site must check in with the HSO, or designee, for orientation and briefing of site hazards.

Supervisory personnel on-site and specialized site workers may be required to have been trained in accordance with 29CFR 1910.120, depending on the nature of their work, exposure potential, and specific type of activities being conducted. However, each will be trained on site-specific hazards, site conditions and emergency operating procedures as well as other pertinent topics prior to job initiation in the areas of environmental concern (AOEC). All personnel on-site are required to attend pre-work "tailgate" meetings. These meetings shall discuss Health and Safety items related to those activities.

In the event hazardous waste or other conditions are encountered in the AOEC requiring upgrade from level D, all activities in the AOEC will be stopped. Continuation of work and entry into the AOEC will be conducted by personnel trained in accordance with 29 CFR 1910.120.

If respiratory protection is required, certification of mandatory training, medical monitoring and documentation of respirator fit testing shall be provided to the HSO before personnel are permitted on site. These records will be maintained as part of the permanent record.

IX. Loss/Near Loss/Injury Reporting

In the event of an injury, near miss, or incident, site personnel must **IMMEDIATELY**:

- Determine the need for medical treatment and administer First Aid. Immediately call 911 if an injury or illness is obviously serious.
- IMMEDIATELY stop operations and notify Kleinfelder contact on site.
- IMMEDIATELY notify Kleinfelder Project Management/Operations Manager.
- Complete ExxonMobil Global Remediation Loss/Near Loss Investigation report as soon as possible, describing the incident IN DETAIL.
- Refer to Kleinfelder Health and Safety Procedures for detailed responsibilities.

X. HASP REVISIONS/SITE CONDITION CHANGE FORM

Non-Conformance of Health and Safety Procedures/Comments regarding implementation: _____

Change in Site Conditions: _____

___ Site personnel notified and informed of changes on: Date/Time notified: _____

___ Contractor Notification and Consent Form updated. Date performed: _____

Plan of Action for Non-routine task/HASP Non-Conformance Issues/Change in conditions: _____

Incident Summary: ___ NA ___ Evacuation ___ Hazardous Material Over Exposure

Loss ___ Near Loss ___ OTHER: _____

(complete ExxonMobil Global Remediation Loss/Near Loss investigation form, see Kleinfelder SOP Manual, SOP#15 for a complete analysis)

___ PM notified ___ Client notified ___ OSHA notified

___ HASP Revision Document Submitted to H&S Department for HASP revision:

Name of Submitter: _____ DATE: _____

Received By: _____ DATE: _____

FORWARD TO HSO FOR HASP REVISION AS NECESSARY; FILE A COPY UNDER "SITE INSPECTION" IN AUDIT FILE

ATTACHMENT A – Air Monitoring Data Observation Record

INSERT HARD COPY

ATTACHMENT B: AUTHORIZATION FOR MEDICAL TREATMENT/PHYSICIAN'S REPORT

PLEASE RENDER TREATMENT TO: Employee _____
for the illness/injury that occurred on: (Date) _____

_____ Conduct an alcohol and drug screen (reasonable cause).

Describe nature and cause of illness/injury including the object, equipment or substance inflicting injury/illness: (**Attach copy of MSDS when a hazardous material is involved**)

Authorized by:

Signature & Title

Telephone

Date

PHYSICIAN'S REPORT

MEDICAL FACILITY:

ADDRESS:

Treating Physician: _____ Date of illness/injury: _____

Previously treated? (Y / N) If yes, give dates _____

Diagnosis:(Industrial illness/injury only) _____

Treatment:(Industrial illness/injury only) _____

Prescription medication prescribed? Yes _____ No _____

Can employee return to work on next scheduled period? Yes _____ No _____

If no, what date can employee return to work? _____

List any medical/physical restrictions: _____

Number of days of restricted activity: _____

The employee is able to return to regular work on: _____

Follow-up treatment required? Yes _____ No _____; Date _____

Physician's signature: _____

EMPLOYEE MUST RETURN THIS RELEASE TO OPERATIONS OFFICE WITHIN 24 HOURS.

**ATTACHMENT C: GLOBAL REMEDIATION LOSS/NEAR LOSS INVESTIGATION
REPORT**

APPENDIX III

Annual Institutional Control/Engineering Control Certification Form

APPENDIX D

ANNUAL INSTITUTIONAL CONTROL / ENGINEERING CONTROL CERTIFICATION

SITE MANAGEMENT PLAN - METHYLENE CHLORIDE AREA
755 JEFFERSON ROAD, HENRIETTA, NEW YORK

Annual Certification Period:
_____ / _____ / _____ to _____ / _____ / _____

INSTITUTIONAL CONTROLS

Control Method	Mechanisms of Implementation, Monitoring, Maintenance, or Enforcement	Evaluation of IC/EC Effectiveness	Inspection Date
1. Post Remedial Groundwater Monitoring			
2. Deed Restriction			
4. Decontamination Facilities			
5. Waste Disposal			

Professional Certification: I certify under penalty of law that I am a Professional Engineer in the State of New York or am otherwise a qualified environmental professional. I certify that the institutional controls and engineering controls employed at this site are:

- Unchanged from the previous certification, unless otherwise approved by the Department, consistent with the SMP,
- In place and effective, and
- Performing as designed, and nothing has occurred that would impair the ability of the controls to protect the public health and environment or constitute a violation or failure to comply with any operation and maintenance plan for such controls.

Signature

Print Name

Date

APPENDIX IV
Site Sampling Plan



**METHYLENE CHLORIDE AREA
SITE SAMPLING PLAN**

**UCB Manufacturing, Inc.
755 Jefferson Road Facility
Henrietta, New York
Monroe County**

Prepared By:

Kleinfelder Engineering, P.C.
1279 Route 300, 2nd Floor 2
Newburgh, New York 12550
(845) 567-6530

Prepared For:

UCB Manufacturing, Inc.
755 Jefferson Road
Henrietta, New York 14623

All Rights Reserved
Copyright 2011 Kleinfelder

ONLY THE CLIENT OR ITS DESIGNATED REPRESENTATIVES MAY USE THIS DOCUMENT AND ONLY FOR THE SPECIFIC PROJECT FOR WHICH THIS REPORT WAS PREPARED.

SITE SAMPLING PLAN

Prepared for:

UCB Manufacturing, Inc.
755 Jefferson Road
Henrietta, NY 14623

**SITE SAMPLING PLAN
755 JEFFERSON ROAD FACILITY
HENRIETTA, NEW YORK
MONROE COUNTY**

Kleinfelder Job No. 119502

Quality Assurance/Quality Control

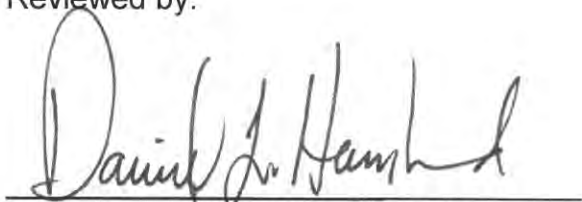
The following personnel have reviewed this report for accuracy, content and quality of presentation:

Prepared by:



Alexander Wirth
Senior Project Geologist

Reviewed by:



Daniel Harpstead, P.E., #086069
President

Kleinfelder
1279 Route 300
Second Floor
Newburgh, New York 12550
o| 845.567.6530
f| 845.567.6542

August 3, 2011

Site SAMPLING PLAN

Water Level Measurements

At the frequency specified in the Post Closure Monitoring Plan (Section 3.0 of the SMP as modified thereafter by agreement between NYSDEC and UCB), the depth to water in each of the wells within the MCA listed below will be measured to the nearest 0.01-foot using a water level indicator. From this data, the elevation of the groundwater table will be calculated and used to prepare groundwater elevation maps that visually depict the groundwater levels in and around the MCA. The quarterly maps will monitor groundwater flow direction in each of the shallow, intermediate and deep zones.

Groundwater Sampling and Procedures

Groundwater will be sampled in the wells listed below, unless this list is subsequently modified by agreement between NYSDEC and UCB. Due to the variety of well diameters, well depths and vertical azimuth, the sampling procedures for each well will vary but will remain consistent with the procedure used during the investigation and remediation phases.

LIST OF QUARTERLY GROUNDWATER MONITORING SAMPLING LOCATIONS

Well ID	Depth of Highest VOC reading ft btoc	Well Azimuth	Depth to Screen Interval ft btoc	Type of Pump Used to Purge	Historical Intake Setting ft btoc
MW-12	21-22	Vertical	2	Peristaltic	10.75
MW-16	13.5	Vertical	8	Peristaltic	13.5
MW-18	5-5.6	Vertical	5	Peristaltic	9.5
MW-23S	NA	Vertical	5	Grundfos	NA
MW-23I	NA	Vertical	25	Grundfos	NA
MW-23D	NA	Vertical	45	Grundfos	NA
MW-D6	57.5	Vertical	55	Grundfos	57.5
MW-D7	20-21.5	Vertical	55	Grundfos	57.5
MW-D8	25.5-25	Vertical	25	Grundfos	27
MW-D9	19-21	63°	60	Grundfos	65
MW-D10	14-16	Vertical	50	Grundfos	55
MW-D12	21-23	45°	76	Grundfos	81
MW-D13	16-18	45°	62	Grundfos	67.5
RW-2	12.5	Vertical	3	Peristaltic	12.5
RW-3	20-22	Vertical	13	Grundfos	21
RW-4	30	45°	10	Grundfos	30
RW-5	34	45°	10	Grundfos	35
RW-6	29	63°	10	Grundfos	29

"btoc": Below Top of Casing, NA= Not Applicable/Not Available

As the post closure monitoring continues and data is evaluated, the wells included in the monitoring program may be changed (which may include the removal of some wells from the program). Any significant change to the monitoring program will be discussed and approved in advance with the NYSDEC Project Manager and reported in the annual report.

All groundwater monitoring data will be recorded on Low-Flow Groundwater Sampling Forms. These protocols may be changed based upon site-related experience, advances in sampling methods or analytical techniques etc. An example of this form is included in Attachment A.

At least initially, a total of 18 wells will be sampled using four Grundfos pumps. Which pump will be used in which wells during each sampling event will be dependent on the historic Methylene Chloride concentration in the well. A detailed concentration based summary of each well group for the four Grundfos pumps is provided in the table below. Based upon a consistent (e.g. at least two quarters in a row) change relative to the concentration categories included below, the pump for a well may be switched to the one designated based upon its most recent monitoring results.

LIST OF QUARTERLY GROUNDWATER MONITORING PUMP AND WELL ASSIGNMENTS:

Grundfos Pump	Pump #1	Pump #2	Pump #3	Pump #4
Historical Methylene Chloride Concentration Range (ug/L)	Non Detect	0.1-100	101-1000	1,001-200,000
Monitoring/Recovery Well	RW-3 MW-D9 RW-6 MW-23S MW-23I MW-23D	MW-D6 MW-D12 MW-D13 MW-D10	RW-5 RW-4 MW-D7	MW-D8

Decontamination

Decontamination of all field investigation sampling equipment will be performed as follows.

- 1 *Heavy Equipment* - The drill rig and all downhole tools will be steam cleaned between each field activity location. If necessary, equipment will be scrubbed manually to remove heavy soils prior to steam cleaning. Equipment will also be steam cleaned

prior to leaving the site. All water generated during decontamination activities will be collected, stored and profiled by the Field Team for proper disposal.

2 *Sampling Equipment (e.g., knives, hand-auger, bowls, bailers)* – All disposable sampling equipment will be cleaned before each use by washing with solutions in the following order:

- phosphate-free detergent wash;
- potable water rinse using distilled or analyte-free lab water;
- air dry.

Potable water will be obtained from a municipal water source.

Heavily affected tools may also be rinsed with methanol, followed by a hexane rinse. If used, the methanol and hexane will be pesticide grade solvents and the spent wash solution will be contained for subsequent proper disposal.

After the final rinse with distilled water, equipment will be wrapped in aluminum foil and stored in a clean area until use.

3 *Meters and Probes* - All meters and probes that are used in the field will be cleaned between uses by washing with a detergent/potable water solution followed by rinsing with distilled or analyte-free water.

4 *Submersible Pumps* –

- Both the pump and its lead will be submerged in a phosphate-free detergent wash. The pump will then be operated for a period of at least approximately 15 seconds (while submerged);
- both the pump and lead will be submerged in a potable water rinse. The pump will then be operated for a period of at least approximately 15 seconds (while submerged);
- both the pump and lead will be submerged in distilled or analyte-free lab water. The pump will then be operated for a period of at least approximately 15 seconds (while submerged);
- both the pump and lead will be wiped down with a disposable (single-use) towel prior to re-spooling;
- all cleaned pumps and leads will be individually stored in dedicated container until next use.

Ground Water Sampling Protocol

1. Collect a PID reading upon initial well cap removal.
2. Collect groundwater levels.
3. All wells must have the pump intake at the area where the highest PID readings were collected during the RDI (See Table above).
4. Purge at an initial flow rate of approximately 0.2 liters per minute. If drawdown appears to be significant at 0.2 liters per minute at the onset of purging, purge flow rate will be decreased to approximately 0.1-liter per minute goal is to achieve minimum drawdown during purging.
5. Monitor water level, pumping rate, pH, temperature, oxidation-reduction potential (ORP), turbidity and dissolved oxygen (DO) every three to five minutes using a water quality meter with a flow-through cell.
 - a. Purging will be deemed complete and the well stabilized and ready for sample collection when the indicator parameters have stabilized for three consecutive readings as follows (Puls and Barcelona 1996):
 - ± 0.1 pH
 - ± 0.5 degrees C
 - ± 10 mV ORP
 - $\pm 10\%$ DO - < 50 NTU's and within $\pm 10\%$ turbidity readings
6. A field decision will be made as to whether to purge a well completely (place pump at the bottom of the well and remove all water). Considerations in making this decision include:
 - a. Stabilization of parameters is not attainable in a well at a flow rate of 0.1 liter per minute or less.
 - b. Low-flow purging continues for 90-minutes without achieving minimal drawdown and stabilization in field parameters.
 - c. Minimal drawdown is not attainable and drawdown progresses to within five feet of the top of the screened interval.

If pumping a well dry is necessary, the Field Team will collect a ground water sample from the well after the ground water level has recovered at least 90%, the ground water level has recovered to an elevation at least five feet above the top of the screened interval, but if these benchmarks have not been reached, within 24-hours of pumping the well dry.

7. Sampling will be conducted at the same flow rate as purging.
8. Samples will be placed on ice immediately after sample collection.
9. All coolers will include a trip blank.
10. Completion of the Chain of Custody.
11. Purged water will be contained on site within the MCA for subsequent treatment and or disposal at an approved facility.
12. Sampling equipment will be either decontaminated or sealed in poly sheeting and dedicated to a single labeled well.

Analytical Parameters

Unless noted differently on the Chain of Custody or in an update to the well sampling Standard Operating Procedure all ground water, duplicate, equipment blank, and trip blank samples should be analyzed by USEPA Method 624 for the following site-specific compound list:

- Acetone
- Benzene
- Carbon disulfide
- Chloroform
- Chloromethane
- Cis-1,2-Dichloroethene
- Dichloro-difluoromethane
- 1,1 Dichloroethylene
- Trans 1,2 Dichloroethene
- Ethyl acetate
- Isopropyl acetate
- Methylene chloride
- Methyl ethyl ketone
- Total Xylenes

APPENDIX V

Deed Restriction

DECLARATION of COVENANTS and RESTRICTIONS

THIS COVENANT is made the ___ day of _____ 20___, by UCB Technologies, Inc, a corporation organized and existing under the laws of the State of New York and having an office for the transaction of business at 755 Jefferson Road, Rochester, New York 14623.

WHEREAS, UCB Technologies, Inc. is the owner of real property located on 755 Jefferson Road in the Town of Henrietta, County of Monroe, State of New York, conveyed by County of Monroe Industrial Development Agency to UCB Technologies, Inc. by deed dated 10th day of March, 2011 and recorded in the Monroe County Clerk's Office in Book 10982 Page 445 of Deeds, and being more particularly described in Appendix "A," attached to this declaration and made a part hereof, and hereinafter referred to as "the Property"; and

WHEREAS, a portion of the Property at the 755 Jefferson Road Property is the subject of a Voluntary Cleanup Agreement bearing Index No. D8-0001-97-07 (the "VCA") executed by Medeva Pharmaceutical Mftg., Inc. as part of the New York State Department of Environmental Conservation's (the "Department's) Voluntary Cleanup Program, namely that portion of the Property legally described in Appendix "B," attached to this declaration and made a part hereof, and hereinafter referred to as "the VCA Site"; and

WHEREAS, the Department approved a remedy to eliminate or mitigate all significant threats to the environment presented by the contamination at a portion of the VCA Site known as the Methylene Chloride Area as described in the Methylene Chloride Area Operation Maintenance and Monitoring Final Engineering Report and Petition for Remedial Closeout as approved by the Department ("Remedy") and such Remedy requires that this portion of the VCA Site be subject to restrictive covenants.

NOW, THEREFORE, UCB Technologies, Inc., for itself and its successors and/or assigns, covenants that:

First, the Property subject to this Declaration of Covenants and Restrictions is the Methylene Chloride Area ("MCA") portion of the VCA Site as shown by a shaded area with GPS reference points on a map attached to this declaration as Appendix "C" and made a part hereof.

Second, unless prior written approval by the Department or, if the Department shall no longer exist, any New York State agency or agencies subsequently created to protect the environment of the State and the health of the State's citizens, hereinafter referred to as "the Relevant Agency," is first obtained, where contamination remains above Site-specific remedial

cleanup standards at the MCA portion of the VCA Site subject to the provisions of the Site Management Plan (“SMP”), as approved by the Department, there shall be no construction, use or occupancy of the MCA portion of the VCA Site that results in the disturbance or excavation of the MCA portion of the VCA Site which threatens the integrity of the engineering controls or which results in unacceptable human exposure to contaminated soils except in compliance with Sections 2.0 and 2.1 of the SMP as approved by the Department.

Third, the owner of the VCA Site shall not disturb, remove, or otherwise interfere with the installation, use, operation, and maintenance of engineering controls required for the Remedy of the MCA portion of the VCA Site, which are described in Sections 2.0 and 2.1 of the Department approved SMP, unless in each instance the owner first obtains a written waiver of such prohibition from the Department or Relevant Agency or the MCA portion of the VCA Site achieves the Site-specific remedial cleanup standards.

Fourth, the owner of the Property shall prohibit the MCA portion of the VCA Site from ever being used for purposes other than for Commercial or Industrial use without the express written waiver of such prohibition by the Department or Relevant Agency or the MCA portion of the VCA Site achieves the Site-specific remedial cleanup standards.

Fifth, the owner of the Property shall prohibit the use of the groundwater underlying the MCA portion of the VCA Site without treatment rendering it safe for drinking water or industrial purposes, as appropriate, unless the user first obtains permission to do so from the Department or Relevant Agency or the MCA portion of the VCA Site achieves Site-specific remedial cleanup standards.

Sixth, until the MCA portion of the VCA Site achieves the Site-specific remedial cleanup standards, the owner of the Property shall provide a periodic certification, prepared and submitted by a professional engineer or environmental professional acceptable to the Department or Relevant Agency, which, consistent with the Department approved form in Section 4.3 of the SMP, will certify that the institutional and engineering controls put in place are unchanged from the previous certification, comply with the SMP, and have not been impaired.

Seventh, until the MCA portion of the VCA Site achieves the Site-specific remedial cleanup standards, the owner of the Property shall continue in full force and effect any institutional and engineering controls required in the MCA portion of the VCA Site for the Remedy and maintain such controls, unless the owner first obtains permission to discontinue such controls from the Department or Relevant Agency, in compliance with the approved SMP, which is incorporated and made enforceable hereto, subject to modifications as approved by the Department or Relevant Agency.

Eighth, this Declaration is and shall be deemed a covenant that shall run with the land and shall be binding upon all future owners of the MCA portion of the VCA Site, and shall provide that the owner and its successors and assigns consent to enforcement by the Department or Relevant Agency of the prohibitions and restrictions that the Voluntary Cleanup Agreement requires to be recorded, and hereby covenant not to contest the authority of the Department or Relevant Agency to seek enforcement.

Ninth, any deed of conveyance that includes the MCA portion of the VCA Site, or any portion thereof, shall recite, unless the Department or Relevant Agency has consented to the termination of such covenants and restrictions, that said conveyance is subject to this Declaration of Covenants and Restrictions.

IN WITNESS WHEREOF, the undersigned has executed this instrument the day written below.

STATE OF NEW YORK)

) s.s.:

COUNTY OF MONROE)

On the _____ day of _____, in the year 2011, before me, the undersigned, personally appeared _____, personally known to me or proved to me on the basis of satisfactory evidence to be the individual(s) whose name is (are) subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their capacity(ies), and that by his/her/their signature(s) on the instrument, the individual(s), or the person upon behalf of which the individual(s) acted, executed the instrument.

Notary Public State of New York

Attachment A

MONROE COUNTY CLERK'S OFFICE

ROCHESTER, NY

THIS IS NOT A BILL. THIS IS YOUR RECEIPT

Receipt # 515419

Index DEEDS

Book 10982 Page 445

No. Pages : 9

Instrument DEED OTHER

Date : 03/30/2011

Time : 04:21:05PM

Control # 201103300830

TT # TT0000009999

Ref 1 #

Employee : RoseM

Return To:
BOX 30-K JONES

COUNTY OF MONROE INDUSTRIAL DEVELOPMENT AGENCY

UCB TECHNOLOGIES INC

COUNTY FEE TP584	\$	5.00
MISCELLANEOUS COUNTY FEE	\$	0.00
COUNTY FEE NUMBER PAGES	\$	40.00
RECORDING FEE	\$	45.00
RP5217 COUNTY FEE	\$	9.00
RP5217 STATE EQUAL ADDIT FEE	\$	241.00
STATE FEE TRANSFER TAX	\$	0.00

Total \$ 340.00

State of New York

MONROE COUNTY CLERK'S OFFICE

WARNING - THIS SHEET CONSTITUTES THE CLERKS
ENDORSEMENT, REQUIRED BY SECTION 317-a(5) &
SECTION 319 OF THE REAL PROPERTY LAW OF THE
STATE OF NEW YORK. DO NOT DETACH OR REMOVE.

CHERYL DINOLFO
MONROE COUNTY CLERK

TRANSFER AMT

TRANSFER AMT \$1.00



8 HE

BARGAIN AND SALE DEED

THIS BARGAIN AND SALE DEED, made this 10th day of March, 2011, between the COUNTY OF MONROE INDUSTRIAL DEVELOPMENT AGENCY, a public benefit corporation having a mailing address of 8100 CityPlace, 50 West Main Street, Rochester, New York 14614 ("Grantor") and UCB TECHNOLOGIES, INC., a New York corporation (as successor in interest to Cell Tech Technologies, Inc.) having an address of 755 Jefferson Road, Rochester, New York 14623 ("Grantee").

WITNESSETH:

That the Grantor, in consideration of One Dollar (\$1.00) and other good and valuable consideration, the receipt and adequacy of which are hereby acknowledged, does hereby grant and release unto the Grantee, its successors and assigns forever, all right title and interest of the Grantor in and to the following:

ALL THAT TRACT OR PARCEL OF LAND, situate in the Town of Henrietta, County of Monroe and State of New York, more particularly described on Exhibit A attached hereto and made a part hereof.

Being and hereby intending to convey the same premises conveyed to the Grantor herein by a deed dated October 1, 1997 and recorded in the Monroe County Clerk's office on September, 28, 1998 in Liber 9066 of Deeds, at page 140.

SUBJECT TO all easements, covenants and restrictions of record.

Property Address: 755 Jefferson Road, Town of Henrietta,
mailing address Monroe County, New York

Tax Account No.: 162.09-1-2.1

RECORDED
2011 MAR 30 AM 10:24
MONROE COUNTY CLERK

TOGETHER with the appurtenances and all the estate and rights of the Grantor in and to said premises.

TO HAVE AND TO HOLD the premises herein granted unto the Grantee, its successors and assigns forever.

AND THE GRANTOR COVENANTS that it has not done or suffered anything whereby the said premises have been encumbered in any way whatever. The Grantor covenants further that, in compliance with Section 13 of the Lien Law, the Grantor will receive the consideration for this conveyance and will hold the right to receive such consideration as a trust fund to be applied first for the purpose of paying the cost of the improvement and will apply the same first to the payment of the cost of the improvement before using any part of the total of the same for any other purpose.

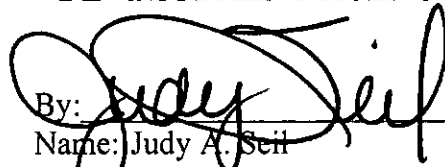
Box 30 - K. Jones

THIS CONVEYANCE does not render the Grantor insolvent and is not made in defraud of creditors.

THIS CONVEYANCE is made in the ordinary course of Grantor's business and does not constitute all or substantially all of the assets of the Grantor.

IN WITNESS WHEREOF, the Grantor has caused this instrument to be executed and delivered as of the day and year first above written.

**COUNTY OF MONROE INDUSTRIAL
DEVELOPMENT AGENCY**

By: 
Name: Judy A. Seil
Its: Executive Director

STATE OF NEW YORK)
COUNTY OF MONROE) ss.:

On the 10th day of March, 2011, before me, the undersigned, a Notary Public in and for said State, personally appeared **Judy A. Seil**, personally known to me or proved to me on the basis of satisfactory evidence to be the individual whose name is subscribed to the within instrument and acknowledged to me that she executed the same in her capacity, and that by her signature on the instrument, the individual or the person upon behalf of which the individual acted, executed the instrument.

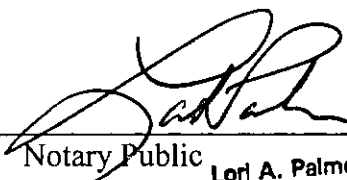

Notary Public **Lori A. Palmer**
Notary Public, State of New York
Qualified in Monroe County
Commission Expires May 31, 2011

EXHIBIT A

Legal Description of Premises

PARCEL 1

ALL THAT TRACT OR PARCEL OF LAND, situate in the Town of Henrietta, County of Monroe and State of New York, being a part of Lot No. 6, Fourth Range, Township 12, Range 7, more particularly described as follows:

Beginning at a point on the south line of Jefferson Road a distance of 812.21 feet west of the northeast corner of property conveyed to South Gate Development Co. Inc. by deed recorded in Monroe County Clerk's Office in Liber 2974 of Deeds, at page 102, and being the northwest corner of land now or formerly occupied by Photostat Corporation; thence (1) southerly and making a right angle with the south line of Jefferson Road, a distance of 800 feet to a point, which is the southwest corner of said land occupied by Photostat Corporation; thence (2) westerly and making a right angle with course (1) a distance of 550 feet to a point; thence (3) northerly and making a right angle with course (2) a distance of 800 feet to a point on the south line of Jefferson Road; thence (4) easterly and along the south line of Jefferson Road and making a right angle with course (3) a distance of 550 feet to the point or place of beginning.

PARCEL 2

ALL THAT TRACT OR PARCEL OF LAND, situate in the Town of Henrietta, County of Monroe and State of New York, being a part of Lot No. 6, Fourth Range, Township No. 12, Range No. 7, more particularly described as follows: Beginning at a point in the west line of Clay Road, said point being the southeast corner of lands conveyed by South Gate Development Co., Inc. to Emil Muller and Ray Hylan by deed recorded in Monroe County Clerk's Office on September 28, 1955 in Liber 2998 of Deeds, at page 309 and now or formerly occupied by Photostat Corporation;

EXHIBIT A (continued)

thence (1) westerly at an interior angle of $67^{\circ} 40'$ with the westerly line of Clay Road and running along the southerly line of lands so conveyed to Muller and Hylan and along the southerly line of lands conveyed by Emil Muller and Ray Hylan to Chemgate Realty Corporation by deed recorded in Monroe County Clerk's Office on April 7, 1958 in Liber 3150 of Deeds, page 280 a distance of 1122.02 feet to the southwest corner of lands so conveyed to Chemgate Realty Corporation; thence (2) southerly making a right angle with the last course a distance of 300 feet; thence (3) easterly making a right angle with the last course a distance of 998.78 feet to a point in the westerly line of Clay Road; thence (4) northerly at an interior angle of $112^{\circ} 20'$ and running along the westerly line of Clay Road a distance of 324.33 feet to the point of beginning. The intersection of the center line of Clay Road with the easterly extension of the first course of the above described premises is located 900.55 feet southwesterly of the intersection of the center line of Clay Road with the center line of Jefferson Road.

PARCEL 3

ALL THAT TRACT OR PARCEL OF LAND, situate in the Town of Henrietta, County of Monroe and State of New York, being a part of Lot No. 6, Fourth Range, Township No. 12, Range No. 7, more particularly described as follows:

Beginning at the southwest corner of property conveyed to R. J. Strassenburgh Company by deed recorded in the Monroe County Clerk's Office in Liber 3199 of Deeds, at page 420;

thence (1) southwesterly and along the west line of Clay Road a distance of 334.90 feet to a point; thence (2) westerly in a line making an interior angle of $112^{\circ} 20'$ with course (1) a distance of 871.52 feet to a point; thence (3) northerly in a line making a right angle with course (2) a distance of 309.78 feet to a point; thence (4) easterly in a line making a right angle with course (3) a distance of 998.78 feet to a point on the west line of Clay Road, the point or place of beginning.

EXHIBIT A (continued)

PARCEL 4

ALL THAT TRACT OR PARCEL OF LAND, situate in the Town of Henrietta, County of Monroe and State of New York, being parts of Lots 6 and 8 of the Fourth Range, Township 12, Range 7 more particularly described as follows:

Beginning at a point in the westerly line of Clay Road, said point being 1436.33 feet southerly from the southernmost point of land conveyed for Jefferson Road by Frank Lesinik and wife to County of Monroe by deed recorded in Monroe County Clerk's Office in Liber 1672 of Deeds, at page 268; thence running the following courses and distances:

- (1) Southwesterly along the westerly line of Clay Road a distance of 247.32 feet to its intersection with the north line of land conveyed by Cornelius S. DeWitt and wife to James Mullen by deeds recorded in Monroe County Clerk's Office in Liber 229 of Deeds, page 422 and Liber 249 of Deeds, page 457;

- (2) Westerly at an interior angle of $113^{\circ} 15'$ with the preceding course and along the north line of lands so conveyed to Mullen a distance of 417.24 feet to the northwest corner of lands conveyed to said Mullen by Liber 249 of Deeds, page 457 marked by an iron pipe;
- (3) Southwesterly parallel with the westerly line of Clay Road and along the west line of land so conveyed to said Mullen by Liber 249 of Deeds, page 457 and said line continued, a total distance of 357.10 feet to a point;
- (4) Westerly at an interior angle of $113^{\circ} 15'$ with the preceding course a distance of 224.68 feet to a point in the southerly continuation of the west line of land conveyed to R. J. Strassenburgh Company by deed recorded in Monroe County Clerk's Office on March 31, 1959 in Liber 3199 of Deeds, page 428;
- (5) Northerly at an interior angle of $89^{\circ} 05'$ with the preceding course and along the said southerly continuation of the west line of land so conveyed to Strassenburgh a distance of 569.35 feet to a point;

EXHIBIT A (continued)

(6) Easterly at right angles to the preceding course, and parallel with and 309.78 feet southerly from the south line of lands so conveyed to Strassenburgh and said line continued, a distance of 871.52 feet to the point and place of beginning; the last course making an interior angle with the first course of 67° 40'.

PARCEL 5

ALL THAT TRACT OR PARCEL OF LAND, situate in the Town of Henrietta, County of Monroe, and State of New York, being parts of Lots 6 and 8, Fourth Range, Township 12, Range 7, more particularly described as follows:

Beginning at a point located 365 feet southerly of the northwest corner of property conveyed to R. J. Strassenburgh Company by deed dated March 31, 1959 and recorded in Monroe County Clerk's Office in Liber 3199 of Deeds, at page 428, as measured along the westerly boundary line of said parcel and continuation thereof, which point is also located 1165 feet southerly of the south boundary line of Jefferson Road as measured along the west boundary line of said parcel and continuations thereof; thence (1) in a westerly direction making an interior angle of 90° with the said continuation of the west boundary line of said parcel a distance of 470 feet to a point; thence (2) in a southerly direction at an interior angle with the preceding course of 90° a distance of 881.66 feet to a point on the southerly line of property conveyed to Rochester Engraving Works, Inc. by instrument recorded in Liber 3645 of Deeds, at page 595 on June 10, 1965; thence (3) in an easterly direction at an interior angle of 89° 05' with the preceding course a distance of 1087.16 feet along said southerly line to a point located on the west line of Clay Road; thence (4) in a northeasterly direction at an interior angle with the preceding course of 113° 05' a distance of 65.30 feet along the west line of Clay Road to a point; thence (5) in a westerly direction at an interior angle with the preceding course of 66° 45' a distance of 641.92 feet to a point located at the southwest corner of property conveyed to R.J. Strassenburgh Company by deed dated January 6, 1960 and recorded in said Clerk's Office in Liber 3254 of Deeds, at page 259;

EXHIBIT A (continued)

thence (6) northerly making an angle in the northeast quadrant of $89^{\circ} 05'$ a distance of 814.13 feet to the place of beginning, and there forming an interior angle of 90° with the first course set forth herein.

Excepting from the above parcels, that portion of the above described premises which is now known as Fison Drive.

The demised premises may be alternatively described as:

All that tract or parcel of land situate in parts of Town Lots 6 & 8, in the fourth range of lots, Township 12, seventh range of Townships, in the Town of Henrietta, County of Monroe, State of New York, and being more particularly described as follows:

Commencing at the intersection of the easterly line of Market Place Drive (60 feet Right of Way) with the southerly line of Jefferson Road (100 feet Right of Way); thence North $88^{\circ} -44' -36''$ East, in the southerly line of said Jefferson Road a distance of 470.00 feet to the point and place of beginning;

- 1) thence, continuing in the southerly line of said Jefferson Road North $88^{\circ} -44' -36''$ East, a distance of 550.00 feet to a point;
- 2) thence, South $01^{\circ} -15' -25''$ East, a distance of 800.00 feet to a point;
- 3) thence, North $88^{\circ} -44' -36''$ East, a distance of 572.02 feet to a ~~point in the westerly line of Clay Road (49.5 feet Right of Way);~~
- 4) thence, South $21^{\circ} -04' -36''$ West, in the westerly right of way of said Clay Road, a distance of 906.55 feet to a point;
- 5) thence, South $87^{\circ} -49' -36''$ West, a distance of 417.24 feet to a point;
- 6) thence, South $21^{\circ} -04' -36''$ West, a distance of 357.10 feet to a point;

EXHIBIT A (continued)

- 7) thence, North $87^{\circ} -49' -36''$ East, a distance of 417.24 feet to the westerly right of way of the aforesaid Clay Road;
- 8) thence, South $21^{\circ} -04' -36''$ West, in the said westerly line of Clay Road a distance of 7.45 feet to a point of curvature;
- 9) thence, in a curve to the right, having a radius of 30.00 feet, a delta of $86^{\circ} -45' -00''$ an arc length of 47.60 feet to a point of tangency in the northerly right of way of Fisons Drive (60.00 feet Right of Way);
- 10) thence, South $87^{\circ} -49' -36''$ West, in the said northerly right of way of Fisons Drive, a distance of 1,051.41 feet to a point of curvature;
- 11) thence, on a curve to the right having a radius of 30.00 feet, a delta of $90^{\circ} -55' -00''$ an arc length of 47.60 feet to a point of tangency in the easterly line of the aforesaid Market Place Drive;
- 12) thence, North $01^{\circ} -15' -24''$ West in the said easterly line of Market Place Drive a distance of 816.18 feet to a point;

- 13) thence, North $88^{\circ} -44' -36''$ East, a distance of 470.00 feet to a point;
- 14) thence, North $01^{\circ} -15' -24''$ West, a distance of 1165.00 feet to the point and place of beginning.

Attachment B

DESCRIPTION OF VCA SITE
LOT 1 OF THE UCB MANUFACTURING SUBDIVISION
#755 JEFFERSON ROAD
TOWN OF HENRIETTA

All that tract or parcel of land situate in the Town of Henrietta, County of Monroe, State of New York and is more particularly described as follows:

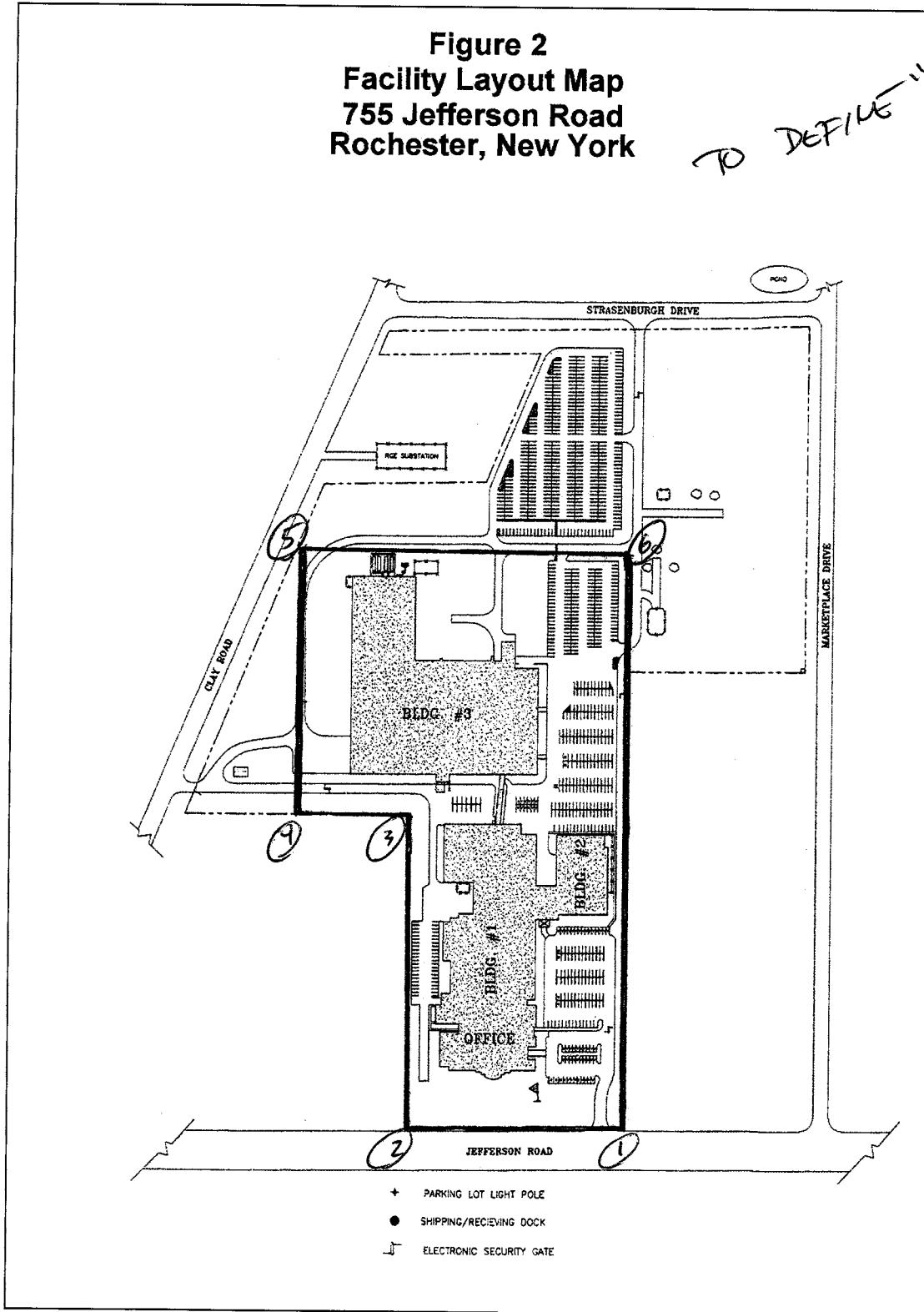
Beginning at a point in the south right-of-way line of Jefferson Road, N.Y.S. Route 252, said point being the northwest corner of Lot 1 of the UCB Manufacturing Subdivision, filed in the Monroe County Clerk's Office, Liber 330 of Maps, Page 55. Said point being further described as being easterly, a distance of 470.00 feet from the intersection formed by the aforesaid south right-of-way line and the east right-of-way line of Marketplace Drive at the approximate following coordinates:

- Thence, 1 - N 88°-44'-44" E, along the south right-of-way line of Jefferson Road, N.Y.S. Route 252, a distance of 550.00 feet to a point,
- Thence, 2 - S 01°-15'-16" E a distance of 800.00 feet to a point,
- Thence, 3 - N 88°-44'-44" E a distance of 286.01 feet to a point,
- Thence, 4 - S 01°-15'-16" E a distance of 762.72 feet to a point,
- Thence, 5 - S 87°-49'-44" W a distance of 858.06 feet to a point,
- Thence, 6 - N 01°-15'-16" W a distance of 1573.11 feet to the point and place of beginning.

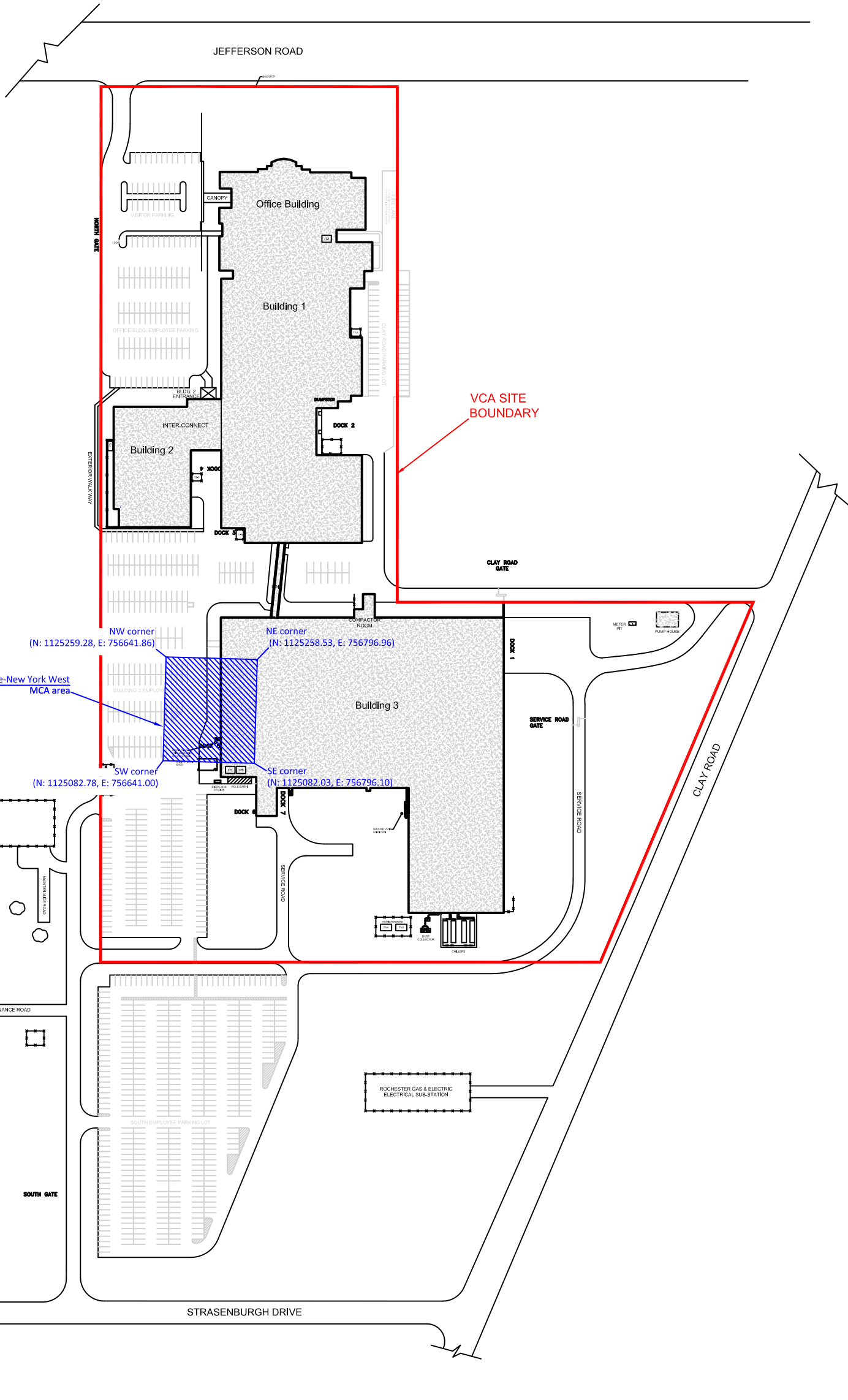
Intending to describe "VCA Site" within Lot 1 of the UCB Manufacturing Subdivision, which contains 40.153 acres, #755 Jefferson Road, Town of Henrietta.

Figure 2
Facility Layout Map
755 Jefferson Road
Rochester, New York

TO DEFINE "VCA SITE"



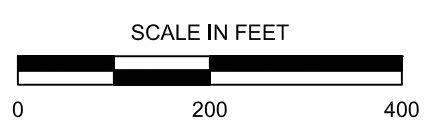
Attachment C



Site Information

The four-building site covers approximately 40 acres.

Office Building (Building 0)	- 115,000 sq. ft.
Building 1	181,300 sq. ft.
Building 2	31,000 sq. ft.
Building 3	176,000 sq. ft.



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PROJECT NO.	109794
DRAWN:	JUN 2011
DRAWN BY:	TB
CHECKED BY:	
FILE NAME:	SANOFIBM_FEB11.dwg

MCA AREA SUBJECT TO DEED RESTRICTION
UCB MFG. PHARMACEUTICALS 755 JEFFERSON ROAD ROCHESTER, NEW YORK

FIGURE
1

APPENDIX VI

Excavation Work Plan



**METHYLENE CHLORIDE AREA
EXCAVATION WORK PLAN**

**UCB Manufacturing, Inc.
755 Jefferson Road Facility
Henrietta, New York
Monroe County**

Prepared By:

Kleinfelder Engineering, P.C.
1279 Route 300, 2nd Floor 2
Newburgh, New York 12550
(845) 567-6530

Prepared For:

UCB Manufacturing, Inc.
755 Jefferson Road
Henrietta, New York 14623

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EXCAVATION WORK PLAN

Prepared For:

UCB Manufacturing, Inc.
755 Jefferson Road
Henrietta, NY 14623

**EXCAVATION WORK PLAN
755 JEFFERSON ROAD FACILITY
HENRIETTA, NEW YORK
MONROE COUNTY**

Kleinfelder Job No. 119502

Quality Assurance/Quality Control


The following personnel have reviewed this report for accuracy, content and quality of presentation:

Prepared by:



Alexander Wirth
Senior Project Geologist

Reviewed by:



Daniel Harpstead, P.E., #086069
President

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August 3, 2011

APPENDIX VI – EXCAVATION WORK PLAN METHYLENE CHLORIDE AREA

A-1 AREA COVERED BY THIS WORKPLAN

This Excavation Work plan (EWP) must be followed during any excavation within the area formerly designated the “Methylene Chloride Area” or “MCA”. It involves a portion of the area west of Building 3 as well as some of the area beneath Building 3. Its approximate boundaries are shown on Figure 1. The following table includes the coordinates of the boundaries of the MCA.

<u>NAD 27- State Plane-New York West</u>	
MCA area	
•	NE corner (N: 1125258.53, E: 756796.96)
•	SE corner (N: 1125082.03, E: 756796.10)
•	SW corner (N: 1125082.78, E: 756641.00)
•	NW corner (N: 1125259.28, E: 756641.86)

A-2 RESTRICTIONS ON WORK ALLOWED WITHIN THE MCA

In accordance with the recorded Deed Restriction for the property, where contamination remains above Site-specific remedial cleanup standards within the MCA (see Table EWP-1), there shall be no construction that results in the disturbance or excavation which threatens the integrity of the engineering controls or which results in unacceptable human exposure to contaminated soils except in compliance with Sections 2.0 and 2.1 of the SMP as approved by the Department.

TABLE EWP-1
APPROVED MCA SOIL CLEAN-UP OBJECTIVES¹

Parameter	Approved Soil Clean Up Objective (ug/kg)
Acetone	27
Benzene	20
2- Butanone	55
Carbon disulfide	661
Chloroform	53
Cis-1,2-Dichloroethene	135
Methylene Chloride	26
Total Xylenes	294

¹As set forth in Table 1-4 of the *Remedial Action Selection Report* for the site. ERM October 2002. Approved by NYSDEC in a letter **December 19, 2002**. While semi-volatiles compounds (SVOCs) were also included in Table 1-4, SVOCs have never driven the remediation.

A-3 NOTIFICATION

At least seven days prior to the start of an excavation that is anticipated to be 10 feet in depth or greater within the MCA, the site owner or their representative will submit a written notification to the Department of Environmental Conservation (“NYSDEC” or the “Department”). Currently, this notification will be made to:

Bartholomew H. Putzig, P.E.
Regional Hazardous Waste Remediation Engineer
NYSDEC, Division of Environmental Remediation - Region 8
6274 East Avon-Lima Road, Avon, NY 14414

The Department may change the person to whom notifications is to be made by informing the current owner of the site. A change in the Department contact will not necessitate a change in this Excavation Work plan.

This notification will include each of the following to the extent they are applicable to the proposed work:

- The name and address of the site and the Department’s site identification number [755 Jefferson Road Site, 755 Jefferson Rd, Henrietta NY 14623, VCP # V00126-8.]
- A detailed description of the work to be performed within the MCA, including the (i) location and areal extent, (ii) any intrusive elements or utilities to be installed below the ground surface of the MCA and (iii) any work that may impact an engineering control applicable to the MCA.
- A summary of environmental conditions anticipated in the work areas, including the nature and concentration levels of contaminants of concern, and potential presence of contaminated soil or groundwater;
- The anticipated schedule for the work, including the start and the projected completion dates for all intrusive work,
- A summary of the applicable components of this EWP,
- A statement that the work will be performed in compliance with this EWP and, if required, with 29 CFR 1910.120 (Hazardous Waste Operations and Emergency Response).
- A copy of the contractor’s Health and Safety Plan, in electronic format, if it differs from the HASP provided in Appendix II of the Site management Plan,

- Identification of potential waste streams and disposal facilities for EWP-related wastes which require special management,
- Identification of sources of any anticipated backfill, along with all required soil testing results (see Section A-14 below).

A-4 RESPONSIBILITY FOR COMPLIANCE

A Qualified Environmental Professional² or person under their supervision will oversee all invasive work and the excavation and load-out of all MCA-related excavated material with constituents at levels higher than the site-specific cleanup criteria. The owner of the property and contractors performing work under this EWP are solely responsible for safe execution of all invasive and other work performed under this Plan.

A-5 UTILITY LOCATION and CLEARANCE

The identification of utilities and easements on the site is the responsibility of the contractor, and must be done to the satisfaction of the Qualified Environmental Professional overseeing the project. The Qualified Environmental Professional will determine whether a risk or impediment to the planned work under this SMP is posed by utilities, easements or the in-place Institutional Controls (ICs) and Deed Restrictions within the MCA.

A-6 SOIL SCREENING METHODS

Until the MCA portion of the Site achieves the Site-specific remedial cleanup standards, visual, olfactory and instrument-based soil screening will be performed under the direction of the Qualified Environmental Professional during all MCA-related remedial and development excavations into known or potentially contaminated material (remaining contamination). Soil screening will include all excavation and invasive work, such as excavations for foundations and utility work occurring at depths greater than 10 feet below ground surface.

Soils will be segregated based on previous environmental data and screening results into material that requires off-site disposal, material that requires testing, material that can be returned to the subsurface and material that can be used as cover soil. In accordance with DER-10, an appropriate number of samples will be collected from both piles. The soil samples will be physically characterized and qualitatively screened with a photoionization detector (PID) equipped with a 11.7 electron volt (eV) lamp calibrated to isobutylene span gas to yield total volatile organic compounds (VOCs) in parts per million by volume (ppmv).

Soils will be further segregated based on previous environmental data and screening results into material that requires off-site disposal, material that requires additional testing, material that can be returned to the subsurface, and, if needed, material that can be used as cover soil.

² For purposes of this Excavation Work Plan, a "Qualified Environmental Professional" is an individual who meets the definition included in §1.3 (49) of DER-10 *Technical Guidance For Site Investigation and Remediation* (May 3, 2010 or latest version promulgated by NYSDEC). This is available on the NYSDEC web site (<http://www.dec.ny.gov/>).

A-7 STOCKPILE METHOD

Stormwater pollution prevention is discussed in Section A-14 below. Those requirements, if applicable, must also be met for soil stock-piles from, or stored within, the MCA, even if a full Stormwater Prevention Plan and Stormwater Construction SPDES Permit is not needed. These MCA-related soil stockpiles will be continuously encircled with a berm and/or silt fence, except when soil is being added or removed. Hay bales or other methods to filter stormwater will be used as needed near catch basins, surface waters and other discharge points.

Except when soil is being added or removed, MCA-related stockpiles will be kept covered at all times with appropriately anchored tarps and damaged tarp covers will be promptly replaced. At a minimum of once each week and after every storm, MCA-related stockpiles will be inspected, with a goal of identifying and rectifying issues that could cause sediment runoff. Results of inspections will be recorded in a logbook, maintained at the site and made available for inspection by NYSDEC.

A-8 MATERIALS EXCAVATION AND LOAD OUT

A Qualified Environmental Professional or person under their supervision will oversee all invasive work and the excavation and load-out of all excavated material.

The presence of utilities and easements on the site will be investigated by the Qualified Environmental Professional who will determine whether a risk or impediment to the planned work under this SMP is posed by utilities or easements on the site.

Loaded vehicles leaving the site carrying soil or other material excavated from the MCA will be appropriately lined, tarped, securely covered, manifested, and placarded in accordance with applicable Federal, State, local, and NYSDOT requirements (and all other applicable transportation requirements).

Locations where vehicles exit the site shall be inspected daily when off-site soil transportation is being done for evidence of off-site soil tracking. If a potential for off-site tracking of soil is identified, appropriate measures will be implemented to prevent further off-site tracking.

The qualified environmental professional will be responsible for ensuring that all egress points for truck and equipment transport from the site are clean of dirt and other materials derived from the site during intrusive excavation activities.

A-9 MATERIALS TRANSPORT OFF-SITE

All transport of excavated MCA-related materials will be performed by licensed haulers in accordance with appropriate local, State, and Federal regulations, including 6 NYCRR Part 364. If required by applicable law, haulers will be appropriately licensed and trucks properly placarded.

Material transported by trucks exiting the site will be secured with tight-fitting covers. Loose-fitting canvas-type truck covers will be prohibited. If loads contain wet material capable of producing free liquid, truck liners will be used.

Truck transport routes will be determined based upon the ultimate destination of the material being transported and will be finalized prior to work commencing. All trucks loaded with site materials will exit the vicinity of the site using only approved truck routes. Routes will be selected by taking into account: (a) limiting transport through residential areas and past sensitive sites; (b) use of city mapped truck routes; (c) prohibiting off-site queuing of trucks entering the facility; (d) limiting total distance to major highways; (e) promoting safety in access to highways; and (f) overall safety in transport;

Egress points for truck and equipment transport from the site will be kept clean of dirt and other materials during the EWP project.

Queuing of trucks will be performed on-site in order to minimize off-site disturbance. Off-site queuing will be prohibited.

A-10 MATERIALS DISPOSAL OFF-SITE

All EWP project related excavated material removed from the site having constituents above the Table EWP-1 MCA soil clean-up objectives will be transported and disposed in accordance with all local, State (including 6 NYCRR Part 360) and Federal regulations. If disposal of soil/fill from this site is proposed for unregulated off-site disposal (i.e. clean soil removed for development purposes), a formal request with an associated plan will be made to the NYSDEC. Unregulated off-site management of materials from this site will not occur without formal NYSDEC approval.

Off-site disposal locations for excavated soils will be identified in the pre-excavation notification. This will include estimated quantities and a breakdown by class of disposal facility if appropriate, i.e. hazardous waste disposal facility, solid waste landfill, C/D recycling facility, etc. Actual disposal quantities and associated documentation will be reported to the NYSDEC in the Periodic Review Report. This documentation will include (as applicable): waste profiles, test results, facility acceptance letters, manifests, bills of lading and facility receipts.

Non-hazardous historic fill and contaminated MCA-related soils taken off-site will be handled, at minimum, as a Municipal Solid Waste per 6 NYCRR Part 360-1.2. Material that does not meet Track 1 unrestricted SCOs is prohibited from being taken to a New York State recycling facility (6 NYCRR Part 360-16 Registration Facility).

A-11 MATERIALS REUSE ON-SITE

Soils considered for reuse on-site will be sampled and analyzed for the Table EWP-1 constituents and compared to the MCA soil clean-up objectives listed in that Table. Analysis will be by EPA Method 8260B or other method pre-approved by NYSDEC.

The Qualified Environmental Professional will ensure that procedures defined for materials reuse in this SMP are followed and that unacceptable material does not remain on-site. Soils with one or more constituents above the Table EWP-1 MCA - Specific Soil Clean-up Objectives will not be returned to the excavation and will be disposed of at an off-site facility. Any demolition material proposed for reuse on-site will be sampled for asbestos and the results will be reported to the NYSDEC for acceptance. Concrete crushing or processing on-site will not be performed without prior NYSDEC approval. Organic matter (wood, roots, stumps, etc.) or other solid waste derived from clearing and grubbing of the site will not be reused on-site.

A-12 FLUIDS MANAGEMENT

All excavation dewatering and groundwater monitoring well purge and development waters, will be handled, transported and disposed in accordance with applicable local, State, and Federal regulations. Dewatering, purge and development fluids will not be recharged back to the land surface or subsurface of the site, but will be disposed off-site.

A-13 COVER SYSTEM RESTORATION

After the completion of each project which triggered this Plan, if a change in the surface topography and/or building coverage within the MCA has occurred, a figure showing the modified surface will be included in the next Periodic Review Report and in the next update to the Site Management Plan.

A-14 BACKFILL FROM OFF-SITE SOURCES

All materials proposed for import and use within the MCA will be approved by the project's Qualified Environmental Professional and will be in compliance with provisions in this SMP prior to receipt at the site.

Consistent with 6 NYCRR §375-6.7(d) and DER-10 §5.4(e), (1), soil brought to the site for use as a soil cover or backfill must:

- be free of extraneous debris or solid waste;
- be recognizable soil or other unregulated material as set forth in 6 NYCRR Part 360; and
- not exceed the allowable constituent levels for imported fill or soil for use on and commercial/industrial site which are provided in DER-10 Appendix 5.

The following cannot be imported for use within the MCA.

- Soils that meet 'exempt' fill requirements under 6 NYCRR Part 360, but do not meet backfill or cover soil objectives for this site, will not be imported onto the site for use within the MCA without prior approval by NYSDEC.

- Solid waste will not be imported onto the site.
- Material from industrial sites, spill sites, or other environmental remediation sites or potentially contaminated sites will not be imported to the site.
- Soils that do not meet the allowable constituent levels per 6 NYCRR Part 375-6.5 Soil cleanup objectives for the protection of groundwater.

Sampling is required for all imported soil for use as backfill or cover material. Sampling frequency of the material will be determined considering DER-10 §5.4 (e)(10). Sampling will be performed consistent with DER-10 sections 2.1 through 2.3.

Trucks entering the site with imported soils will be securely covered with tight fitting covers. Imported soils will be stockpiled separately from excavated materials and covered to prevent dust releases.

A-15 STORMWATER POLLUTION PREVENTION

A Stormwater Pollution Prevention Plan (SWPPP) that conforms to the requirements of NYSDEC Division of Water guidelines and NYS regulations will be included as part of the Excavation Work Plan if a NYSDEC Construction-related Stormwater SPDES permit is needed. If a Construction permit is required, no soil disturbance can be initiated until permit coverage is obtained.

Whether or not a Construction Stormwater permit is needed, the following stormwater pollution prevention measures will be implemented within the affected portions of the MCA during excavation activities on site.

- Barriers and hay bales or other sediment barriers will be installed around the entire perimeter of the construction area and inspected once a week and after every storm event whenever MCA-related excavated areas have not been stabilized. Results of inspections will be recorded in a logbook and maintained at the site and available for inspection by NYSDEC. All necessary repairs shall be made immediately.
- Accumulated sediments will be removed as required to keep the barriers and hay bale check functional.
- All undercutting or erosion of the silt fence toe anchor shall be repaired immediately with appropriate backfill materials.
- Manufacturer's recommendations will be followed for replacing silt fencing damaged due to weathering.
- Erosion and sediment control measures identified in the SMP shall be observed to ensure that they are operating correctly. Where discharge locations or points are accessible, they shall be inspected to ascertain whether erosion control measures are effective in preventing significant impacts to receiving waters
- Silt fencing or hay bales will be installed around the entire perimeter of any MCA-related excavation area.

A-16 CONTINGENCY PLAN

If underground tanks or other previously unidentified contaminant sources are found during post-remedial subsurface MCA-related excavations or development related construction, excavation activities will be suspended until sufficient equipment is mobilized to address the condition.

Sampling will be performed on product, sediment and surrounding soils, etc. as necessary to determine the nature of the material and proper disposal method. Chemical analysis will be performed for full a full list of analytes (TAL metals; TCL volatiles and semi-volatiles, TCL pesticides and PCBs), unless the site history and previous sampling results provide a sufficient justification to limit the list of analytes. In this case, a reduced list of analytes will be proposed to the NYSDEC for approval prior to sampling.

Identification of unknown or unexpected contaminated media identified by screening during invasive MCA-related work will be promptly communicated by phone to NYSDEC's Project Manager. Reportable quantities of petroleum product will also be reported to the NYSDEC spills hotline. These findings will be also included in the Periodic Review Reports prepared pursuant to Section 4.4 of the SMP.

A-17 COMMUNITY AIR MONITORING PLAN

If the EWP project activities will be at a depth greater than 10 feet below grade, then the Community Air Monitoring Plan (CAMP) attached as Appendix A1 will be implemented. A figure showing the location of air sampling stations is shown in Figure 1 of the Community Air Monitoring Plan. These locations will be adjusted on a daily or more frequent basis based on actual wind directions to provide an upwind and at least two downwind monitoring stations. The Appendix A1 CAMP can be modified as appropriate for the specific EWP project, as long as it the modified CAMP complies with DER-10 §6.2.1(b)(4) and §1.9(c).

Exceedances of action levels listed in the CAMP will be reported to NYSDEC and NYSDOH Project Managers.

A-18 ODOR CONTROL PLAN

An Odor Control Plan will be developed as necessary per section 2.2 of the CAMP. The requirement for an Odor Control Plan is not anticipated based upon the current impact distribution within the MCA.

A-19 DUST CONTROL PLAN

A project specific dust suppression plan that addresses dust management during invasive on-site work within the MCA will be derived; it will include, at a minimum, the use of appropriate dust suppression techniques.

APPENDIX A1
Community Air Monitoring Plan



**METHYLENE CHLORIDE AREA
COMMUNITY AIR MONITORING PLAN**

**UCB Manufacturing, Inc.
755 Jefferson Road Facility
Henrietta, New York
Monroe County**

Prepared By:

Kleinfelder Engineering, P.C.
1279 Route 300, 2nd Floor 2
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(845) 567-6530

Prepared For:

UCB Manufacturing, Inc.
755 Jefferson Road
Henrietta, New York 14623

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COMMUNITY AIR MONITORING PLAN

Prepared for:

UCB Manufacturing, Inc.
755 Jefferson Road
Henrietta, NY 14623

**COMMUNITY AIR MONITORING PLAN
755 JEFFERSON ROAD FACILITY
HENRIETTA, NEW YORK
MONROE COUNTY**

Kleinfelder Job No. 119502

Quality Assurance/Quality Control

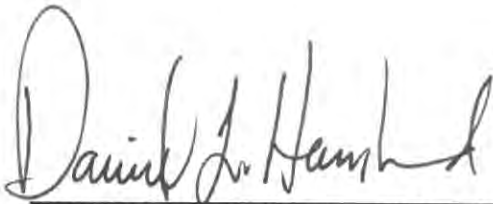
The following personnel have reviewed this report for accuracy, content and quality of presentation:

Prepared by:



Alexander Wirth
Senior Project Geologist

Reviewed by:



Daniel Harpstead, P.E., #086069
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August, 3 2011

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Figure 1 - Site Plan with Proposed Air Monitoring Locations

1.0 INTRODUCTION

Kleinfelder East, Inc. (Kleinfelder) was retained by Sanofi Aventis Inc., on behalf of UCB Manufacturing Inc., to prepare a Community Air Monitoring Plan (CAMP) for the post-remediation Methylene Chloride Area (MCA) located at 755 Jefferson Road, Rochester, New York (Figure 1). This CAMP was prepared consistent with Appendices 1A and 1B of NYSDEC's DER-10 (*Technical Guidance for Site Investigation and Remediation*) to protect downwind potential receptors from airborne volatile organic compound (VOC) vapors and airborne particulates that may migrate from the Site during post-remediation ground intrusive excavation activities.

This CAMP requires real-time monitoring for volatile organic compounds (VOCs) and particulates (i.e., dust) at the downwind perimeter of each designated excavation area whenever active excavation is occurring within the MCA. However, excavation, grading, or placement of known clean fill within the MCA does not trigger the need for VOC or particulate monitoring. The intent of the CAMP is to provide a measure of protection for the downwind community (i.e., off-site receptors including residences and businesses and on-site workers not directly involved with the subject work activities) from potential airborne contaminant releases as a direct result of post-remediation excavation activities within the MCA. Exceedances of the action levels specified herein require increased monitoring, corrective actions to abate emissions, and/or work shutdown. Additionally, the CAMP will help to confirm that activities did not spread contamination off-site through the air.

The CAMP is intended only for monitoring of the Site for the duration of excavation and removal of soil from within the MCA. The location of the MCA is depicted in the Figure and Table EWP-1 included in section A-2 of the Excavation Work Plan to which this CAMP is an Appendix. The area in the vicinity of the MCA consists of commercial property and open space (Figure 1). The MCA is bordered to the east by Building #3. The MCA is bordered to the north by Buildings 1 and 2. The MCA is bordered to the south by a UCB facility parking area, to the west by an undeveloped parcel and beyond that commercial/industrial properties.

2.0 AIR MONITORING

The owner/operator of the Site will appoint an experienced health and safety trained individual, who has completed a 40-hour Occupational Safety and Health Administration (OSHA) training course that meets with the requirements of 29 CFR Part 1910.120 to monitor air quality both on and off Site during MCA-related excavation activities. This individual will either be a Qualified Environmental Professional, as defined in DER-10, or will be working under the supervision of such a Professional.

2.1 Pre-Excavation Ambient Air Monitoring

Prior to commencing excavation, air monitoring will be conducted at the Site which will consist of the collection of ambient air screening data for VOCs and airborne

particulates at an upwind location. This initial air monitoring event will be conducted to establish Site-specific baseline ambient air VOC and airborne particulate levels, which will be used as reference for background levels once work begins. Air will be monitored for the presence of VOC vapors with a MiniRAE 2000 (or equivalent) photoionization detector (PID) with a 11.7 eV lamp capable of displaying 15-minute running averages. Prior to monitoring, the PID will be calibrated to a 100 parts per million by volume (ppm_v) isobutylene span gas according to the manufacturer's specifications.

In addition, a Personal Dust Ram (PDR) 1000 Dust Monitor (or equivalent) will be used to monitor particulate concentrations at the Site. The PDR will be factory calibrated and zeroed in a zero bag each day prior to the commencement of work.

A minimum of three monitoring locations will be utilized during all excavation activities and background monitoring. The selection of monitoring locations will be dependent on where the excavation will occur and the direction of the prevailing wind during excavation. The results of the background monitoring will be recorded and remain on Site during excavation activities.

2.2 VOC Monitoring, Action Levels, and Response Measures

Upon the start of work, a PID will be positioned at the downwind perimeter of the excavation work area. The PID will be utilized to collect a continuous 15-minute running time average of VOC concentrations in ppm_v. The PID utilized to monitor VOC levels will be calibrated in the same manner as set out in § 2.1 prior to commencing work. The downwind location will be determined using a wind sock (or equivalent) which will be positioned on Site prior to commencing work, and will be continually monitored throughout the work day. Average VOC levels will be recorded at 15-minute intervals at the air monitoring locations surrounding work area. The PID will sound an alarm if VOC concentrations exceed the 15-minute running time average of 5 ppm_v above background levels.

1. If the ambient air concentration of total organic vapors at the downwind perimeter of the work area or exclusion zone exceeds 5 parts per million by volume (ppm_v) above background for the 15-minute average, work activities must be temporarily halted and monitoring continued. If the total organic vapor level readily decreases (per instantaneous readings) below 5 ppm_v over background, work activities can resume with continued monitoring.
2. If total organic vapor levels at the downwind perimeter of the work area or exclusion zone persist at levels in excess of 5 ppm_v over background but less than 25 ppm_v, work activities must be halted, the source of vapors identified, corrective actions taken to abate emissions, and monitoring continued. After these steps, work activities can resume provided that the total organic vapor level 200 feet downwind of the exclusion zone or half the distance to the nearest potential receptor or residential/commercial structure, whichever is less - but in no case less than 20 feet, is below 5 ppm_v over background for the 15-

minute average.

3. If the total organic vapor level is above 25 ppm_v at the perimeter of the work area, activities must be shutdown.

All 15-minute readings must be recorded and be available for State (DEC and NYSDOH) personnel to review. Instantaneous readings, if any, used for decision purposes should also be recorded.

2.3 Particulate Monitoring, Action Levels, and Response Measures

Reasonable fugitive dust suppression techniques must be employed during all MCA-related excavation activities which may generate fugitive dust, except those involving only clean fill. Particulate monitoring must be employed when planned excavation within the MCA may generate fugitive dust from exposed MCA-related waste or contaminated soil. Excavation, grading, or placement of known clean fill within the MCA does not trigger the need for particulate monitoring.

Particulate concentrations should be monitored continuously at the upwind and downwind perimeters of the designated excavation work zone at temporary particulate monitoring stations. The particulate monitoring should be performed using real-time monitoring equipment capable of measuring particulate matter less than 10 micrometers in size (PM-10) and capable of integrating over a period of 15 minutes (or less) for comparison to the airborne particulate action level. The equipment must be equipped with an audible alarm to indicate exceedance of the action level. In addition, fugitive dust migration should be visually assessed during all work activities.

1. If the downwind PM-10 particulate level is 100 micrograms per cubic meter (ug/m³) greater than background (upwind perimeter) for the 15-minute period or if airborne dust is observed leaving the work area, then dust suppression techniques must be employed (see Section 2.4 below). Work may continue with dust suppression techniques provided that downwind PM-10 particulate levels do not exceed 150 ug/m³ above the upwind level and provided that no visible dust is migrating from the work area.
 - a. If particulate levels are detected in excess of 150 ug/m³, the upwind background level must be confirmed immediately. If the working site particulate measurement is greater than 100 ug/m³ above the background level, additional dust suppression techniques must be implemented to reduce the generation of fugitive dust and corrective action taken to protect site personnel and reduce the potential for contaminant migration. Corrective measures may include increasing the level of personal protection for on-site personnel and implementing additional dust suppression techniques.
2. If, after implementation of dust suppression techniques, downwind PM-10

particulate levels are greater than 150 mcg/m^3 above the upwind level, work must be stopped and a re-evaluation of activities initiated. Work can resume provided that dust suppression measures and/or other controls are successful in reducing the downwind PM-10 particulate concentration to within 150 mcg/rn^3 of the upwind level and in preventing visible dust migration. Should the action level of 150 ug/m^3 continue to be exceeded, work must stop and DEC-DER must be notified as provided in Section 5.0 below.

All readings must be recorded and be available for State (DEC and NYSDOH) and County Health personnel to review.

There may be situations when dust is being generated and leaving the site and the monitoring equipment does not measure PM-10 at or above the action level. Since this situation has the potential to allow for the migration of contaminants off-site, it is unacceptable. While it is not practical to quantify total suspended particulates on a real-time basis, it is appropriate to rely on visual observation. If dust is observed leaving the working site, additional dust suppression techniques must be employed.

2.4 Mitigation Actions

Implementation of the CAMP does not preclude other simple, common-sense measures from being implemented which are intended to keep VOCs, dust and odors at a minimum around the work areas.

During the soil removal activities, excavated soils will either be stockpiled and covered with polyethylene sheeting, or loaded directly onto trucks and removed for off-site disposal.

If the working site particulate measurement is greater than 100 ug/m^3 above the background level, additional dust suppression techniques must be implemented to reduce the generation of fugitive dust and corrective action taken to protect site personnel and reduce the potential for contaminant migration. Corrective measures may include increasing the level of personal protection for on-site personnel and implementing additional dust suppression techniques, such as some of those listed below. Should the action level of 150 ug/m^3 continue to be exceeded, work must stop and DER must be notified as provided in the site design or remedial work plan. The notification shall include a description of the control measures implemented to prevent further exceedances.

The following techniques have been shown to be effective for the controlling of the generation and migration of dust during construction activities:

- (a) Applying water on haul roads;
- (b) Wetting equipment and excavation faces;
- (c) Spraying water on buckets during excavation and dumping;
- (d) Hauling materials in properly tarped or watertight containers;

- (e) Restricting vehicle speeds to 10 mph;
- (f) Covering excavated areas and material after excavation activity ceases;
and
- (g) Reducing the excavation size and/or number of excavations.

Experience has shown that the chance of exceeding the 150 ug/m³ action level is remote when the above-mentioned techniques are used. When techniques involving water application are used, care must be taken not to use excess water, which can result in unacceptably wet conditions. For example, using atomizing sprays will prevent overly wet conditions, conserve water, and provide an effective means of suppressing the fugitive dust.

3.0 QUALITY ASSURANCE/QUALITY CONTROL

In order to ensure the validity of the fugitive dust measurements performed, there must be appropriate Quality Assurance/Quality Control (QA/QC). It is the responsibility of the Qualified Environmental Professional to adequately implement QA/QC Plans which include the following critical features: periodic instrument calibration, operator training, daily instrument performance (span) checks, and a record keeping plan.

4.0 REPORTING

All air monitoring readings will be recorded and kept readily available on Site for inspection by the NYSDEC and NYSDOH officials during work activities.

Third-party inquiries related to air quality at the Site will be referred to the Division of Environmental Remediation at NYSDEC, Mr. Greg MacLean at (585) 226-5356 (Office) or the NYSDEC Spill Hotline at 1-800-457-7362.

Persistent excavation Work Area VOC or particulate levels above the action levels established in this CAMP will be reported to Mr. Greg MacLean of the NYSDEC at (585) 226-5356. The notification shall include a description of the control measures implemented to prevent further exceedances.

5.0 REFERENCE

Appendices 1-A and 1-B of DER -10 (*Technical Guidance for Site Investigation and Remediation*) NYSDEC November, 2009.

6.0 LIMITATIONS

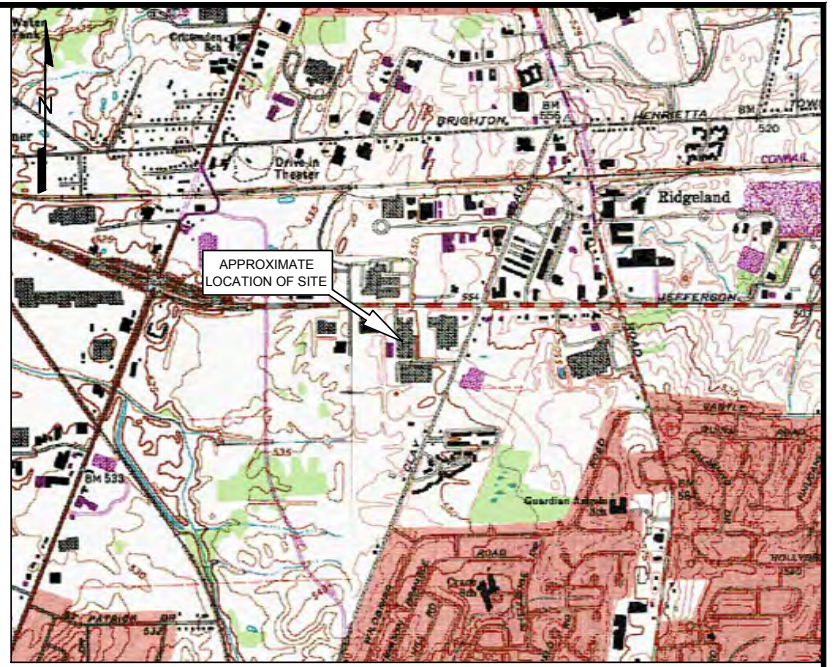
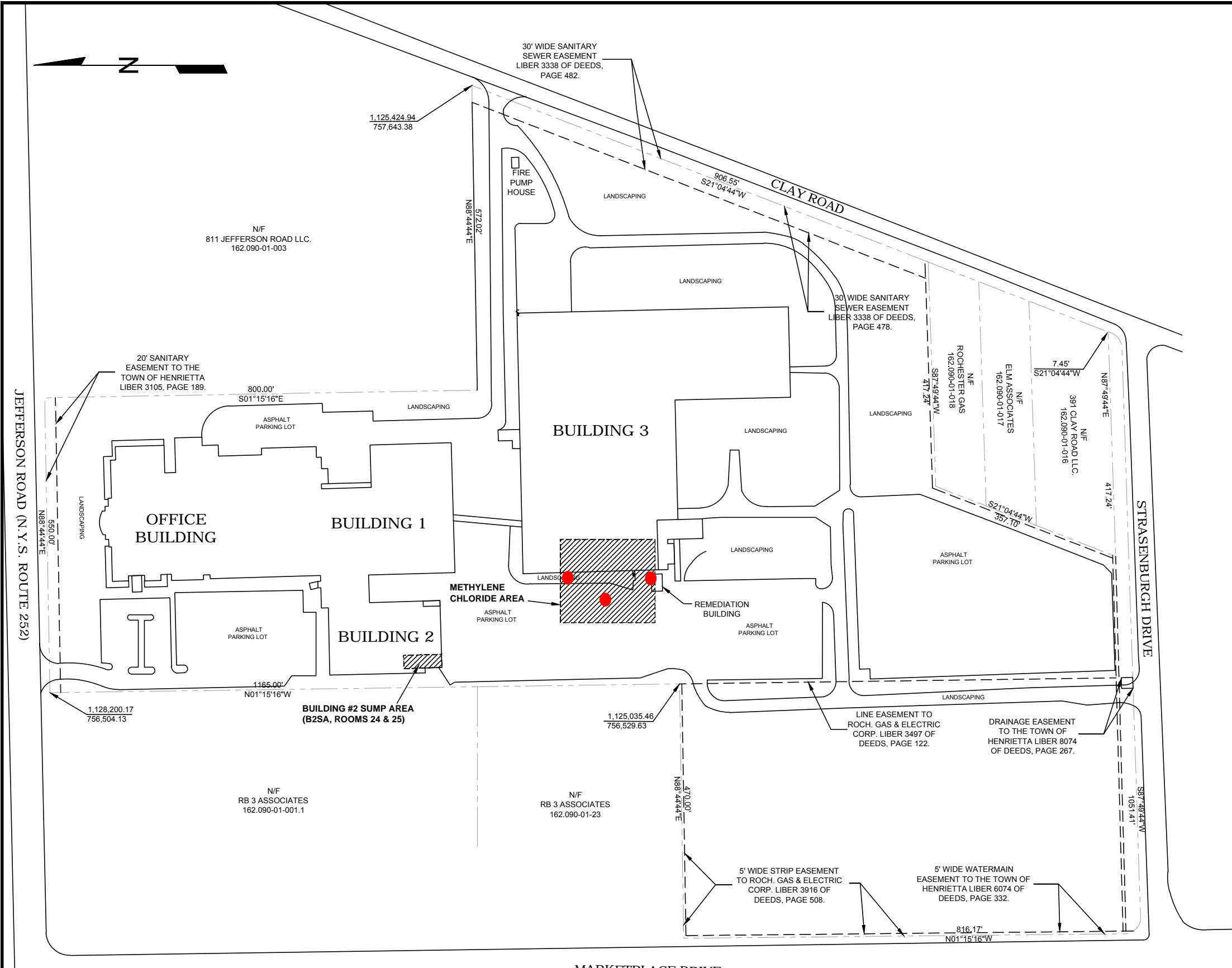
"Kleinfelder performed the services for this project under the Master Agreement for Professional Services between Kleinfelder Engineering, P.C. and Sanofi-aventis US, Inc. dated June 7, 2007. Kleinfelder states that the services performed are consistent with professional standard of care defined as that level of services provided by similar professionals under like circumstances. This report is based on the regulatory

UCB Manufacturing, Inc.
Henrietta, New York

Kleinfelder Engineering PC.
Newburgh, New York

standards in effect on the date of the report. It has been produced for the primary benefit of sanofi-aventis US, Inc. and its affiliates and UCB and its affiliates.”

FIGURES



VICINITY MAP
SCALE 1"=3000'
USGS 7.5' SERIES TOPOGRAPHIC MAP:
PITTSFORD, NY QUADRANGLE

LEGEND

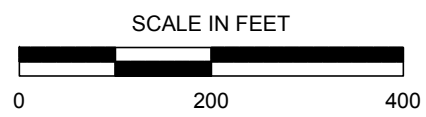
	PROPERTY LINE
	EASEMENT
	BUILDING
	CURB

Monitoring locations

REFERENCES:
1. "SUBDIVISION MAP" PREPARED BY PARRONE ENGINEERING, DATED 12/29/2006.

NEWBURGH, NY

The information included on this graphic representation has been compiled from a variety of sources and is subject to change without notice. Kleinfelder makes no representations or warranties, express or implied, as to accuracy, completeness, timeliness, or rights to the use of such information. This document is not intended for use as a land survey product nor is it designed or intended as a construction design document. The use or misuse of the information contained on this graphic representation is at the sole risk of the party using or misusing the information.



PROJECT NO.	105651
DRAWN:	02/09/11
DRAWN BY:	CTH
CHECKED BY:	AW
FILE NAME:	SANOI_FEB11.dwg

SITE PLAN		FIGURE 1
UCB FACILITY NYSDEC VCP# V00126-8 755 JEFFERSON ROAD		
MONROE COUNTY	ROCHESTER	NEW YORK

APPENDIX VII

Post Remedial Soil Boring Logs

KLEINFELDER

1279 Route 300, Newburgh, New York, 12550
 Phone: (845) 567-6530 Fax: (845) 567-6542

Boring Log

Project:	119502	Casing Elevation:	547.77
Client:	sanofi-aventis	Total Depth:	15' BGS
Location:	755 Jefferson Road, Rochester, NY	Water Level:	5.18'
Boring ID:	MW-23S	Drilling Co.:	Paragon Drilling
Screen Length:	10'	Driller:	Doug H.
Diameter:	2"	Method:	Hollow Stem Auger
PVC Type:	Schedule 40	Start Date:	12/21/10
Slot Size:	0.010	End Date:	12/21/10
Casing Length:	5'	Notes:	
Diameter:	2"		
		Log by:	AW
		Checked by:	



Depth (ft.)	Sample ID	Sample Interval (feet)	PID Headspace (ppm)	Blows / 6"	Recovery / Penetration (inches)	Description	Well Diagram
0.0				Hand Clear	Hand Clear	Asphalt	
0.0				NA	NA	Backfill/crushed stone	
0.0				NA	NA	SAA	
2.0				NA	NA	Brown, SILT, some clay, trace cobbles, trace fine gravel, dry	
0.0				NA	NA	SAA	
0.0				NA	NA	Brown, SILT and clay, little fine sand, trace fine gravel, dry	
0.0				NA	NA	SAA	
0.0				NA	NA	SAA	
0.0				NA	NA	SAA	
0.0				3/4/6/5	13"	SAA	
0.0						SAA	
0.0						SAA	
0.0				6,6,7,12	21"	Brown, SILT and clay, little fine sand, trace fine gravel, moist	
0.0						SAA	
0.0						SAA	
0.0				NA	6"	Cobble	
0.0						NA	
0.0						NA	
0.0				11,9,13,17	18"	Brown, SILT, little fine sand, trace fine gravel, trace clay, moist	
0.0						SAA	
0.0						SAA	
0.0				12,12,12,12	17"	SAA	
0.0				0		SAA	
0.0				6,9,10,14	13"	SAA	
0.0						SAA	
0.0						SAA, boring termination	

Notes:

- Water Table
- NA Not Applicable
- bgs Below ground surface
- SAA Same as above

KLEINFELDER

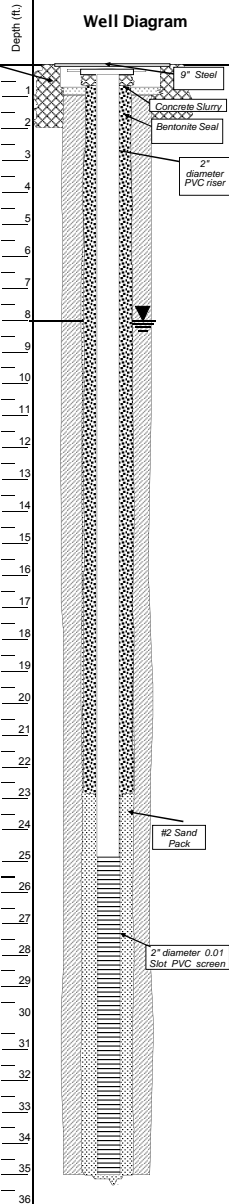
1279 Route 300, Newburgh, New York, 12550
 Phone: (845) 567-6530 Fax: (845) 567-6542

Boring Log

Project:	119502	Casing Elevation:	547.76
Client:	sanofi-aventis	Total Depth:	35' BGS
Location:	755 Jefferson Road, Rochester, NY	Water Level:	8.14'
Boring ID:	MW-23I	Drilling Co.:	Paragon Drilling
Screen Length:	10'	Driller:	Doug H.
Diameter:	2"	Method:	Hollow Stem Auger
PVC Type:	Schedule 40	Start Date:	12/21/10
Slot Size:	0.010	End Date:	12/21/10
Casing Length:	25'	Notes:	
Diameter:	2"	Log by:	AW
		Checked by:	



Depth (ft.)	Sample ID	Sample Interval (feet)	PID Headspace (ppm)	Blows / 6"	Recovery / Penetration (inches)	Description	Depth (ft.)
1			0.0	Hand Clear	Hand Clear	Asphalt	1
2			0.0	NA	NA	Backfill/crushed stone	2
3			0.0	NA	NA	SAA	3
4			0.0	NA	NA	Brown, SILT, some clay, trace cobbles, trace fine gravel, dry	4
5			0.0	NA	NA	SAA	5
6			0.0	NA	NA	Brown, SILT and clay, little fine sand, trace fine gravel, dry	6
7			0.0	NA	NA	SAA	7
8			0.0	NA	NA	SAA	8
9			0.0	NA	NA	SAA	9
10			0.0	NA	6"	Cobble	10
11			0.0	NA	6"	NA	11
12			0.0	11,9,13,17	18"	Brown, SILT, little fine sand, trace fine gravel, trace clay, moist	12
13			0.0	12,12,12,12	17"	SAA	13
14			0.0	6,9,10,14	13"	SAA	14
15			0.0	6,9,10,14	13"	SAA	15
16			0.0	13,10,10,13	24"	SAA	16
17			0.0	13,10,10,13	24"	SAA	17
18			0.0	3,5,7,12	0"	NA	18
19			0.0	3,5,7,12	0"	NA	19
20			0.0	15,12,5,7	9"	Brown, SILT and clay, little fine sand, trace fine gravel, moist	20
21			0.0	15,12,5,7	9"	SAA	21
22			0.0	8,7,6,10	16"	Brown, SILT, little fine sand, trace fine gravel, trace clay, moist	22
23			0.0	8,7,6,10	16"	SAA	23
24			0.0	5,5,7,12	24"	SAA	24
25			0.0	5,5,7,12	24"	SAA	25
26			0.0	6,8,11,11	6"	SAA	26
27			0.0	6,8,11,11	6"	SAA	27
28			0.0	4,6,13,8	16"	SAA	28
29			0.0	4,6,13,8	16"	SAA	29
30			0.0	4,7,8,9	8"	SAA	30
31			0.0	4,7,8,9	8"	SAA	31
32			0.0	7,9,11,12	5"	SAA	32
33			0.0	7,9,11,12	5"	SAA	33
34			0.0	8,8,10,11	12"	SAA	34
35			0.0	8,8,10,11	12"	SAA	35
36			0.0			SAA, Boring terminated	36



Notes:
 Water Table
 NA Not Applicable
 bgs Below ground surface
 SAA Same as above

KLEINFELDER

1779 Route 300, Hingham, New York, 12550
Phone: (845) 567-6530 Fax: (845) 567-6542

**Boring Log
MW-23D**

Project: 119502	Casing Elevation: 547.62
Client: sanofi-aventis	Total Depth: 55' BGS
Location: 755 Jefferson Road, Rochester, NY	Water Level: 26.15'
Boring ID: MW-23D	Drilling Co.: Paragon Drilling
Screen Length: 10'	Driller: Doug H.
Diameter: 2"	Method: Hollow Stem Auger
PVC Type: Schedule 40	Start Date: 12/22/10
Slot Size: 0.010	End Date: 12/22/10
Casing Length: 44'	Notes:
Diameter: 2"	Log by: AW Checked by:



Depth (ft.)	Sample ID	Sample Interval (feet)	P.D. Holes (feet)	Borehole (ft.)	Recovery / Penetration (feet)	Description	Well Diagram
0.0		Hand Clear		Hand Clear		Asphalt	
0.0	NA	NA	NA	NA	NA	Backfill/crushed stone	
0.0	NA	NA	NA	NA	NA	Brown, SILT, some clay, trace cobbles, trace fine gravel, dry	
0.0	NA	NA	NA	NA	NA	SAA	
0.0	NA	NA	NA	NA	NA	Brown, SILT and clay, little fine sand, trace fine gravel, dry	
0.0	NA	NA	NA	NA	NA	SAA	
0.0	NA	NA	NA	NA	NA	SAA	
0.0	NA	3/4/6/5	13"	13"	13"	SAA	
0.0	NA	NA	NA	NA	NA	SAA	
0.0	NA	NA	NA	NA	NA	SAA	
0.0	NA	6.6,7.12	21"	21"	21"	Brown, SILT and clay, little fine sand, trace fine gravel, moist	
0.0	NA	NA	NA	NA	NA	SAA	
0.0	NA	NA	NA	NA	NA	SAA	
0.0	NA	NA	6"	6"	6"	Cobble	
0.0	NA	NA	NA	NA	NA	NA	
0.0	NA	NA	NA	NA	NA	NA	
0.0	NA	11.9,13,17	18"	18"	18"	Brown, SILT, little fine sand, trace fine gravel, trace clay, moist	
0.0	NA	NA	NA	NA	NA	SAA	
0.0	NA	NA	NA	NA	NA	SAA	
0.0	NA	12,12,12,12	17"	17"	17"	SAA	
0.0	NA	NA	NA	NA	NA	SAA	
0.0	NA	6.9,10,14	13"	13"	13"	SAA	
0.0	NA	NA	NA	NA	NA	SAA	
0.0	NA	NA	NA	NA	NA	SAA	
0.0	NA	13,10,10,13	24"	24"	24"	SAA	
0.0	NA	NA	NA	NA	NA	SAA	
0.0	NA	NA	NA	NA	NA	SAA	
0.0	NA	3.5,7,12	0"	0"	0"	NA	
0.0	NA	NA	NA	NA	NA	NA	
0.0	NA	NA	NA	NA	NA	NA	
0.0	NA	15,12,5,7	9"	9"	9"	Brown, SILT and clay, little fine sand, trace fine gravel, moist	
0.0	NA	NA	NA	NA	NA	SAA	
0.0	NA	NA	NA	NA	NA	SAA	
0.0	NA	8,7,6,10	16"	16"	16"	Brown, SILT, little fine sand, trace fine gravel, trace clay, moist	
0.0	NA	NA	NA	NA	NA	SAA	
0.0	NA	NA	NA	NA	NA	SAA	
0.0	NA	5,5,7,12	24"	24"	24"	SAA	
0.0	NA	NA	NA	NA	NA	SAA	
0.0	NA	NA	NA	NA	NA	SAA	
0.0	NA	6.8,11,11	6"	6"	6"	SAA	
0.0	NA	NA	NA	NA	NA	SAA	
0.0	NA	NA	NA	NA	NA	SAA	
0.0	NA	4.6,13,8	16"	16"	16"	SAA	
0.0	NA	NA	NA	NA	NA	SAA	
0.0	NA	4,7,8,9	8"	8"	8"	SAA	
0.0	NA	NA	NA	NA	NA	SAA	
0.0	NA	7,9,11,12	5"	5"	5"	SAA	
0.0	NA	NA	NA	NA	NA	SAA	
0.0	NA	8,8,10,11	12"	12"	12"	SAA	
0.0	NA	NA	NA	NA	NA	SAA	
0.0	NA	11,14,18,15	7"	7"	7"	Brown, SILT and fine sand, some clay, trace gravel, moist to wet	
0.0	NA	NA	NA	NA	NA	SAA	
0.0	NA	NA	NA	NA	NA	SAA	
0.0	NA	11,9,9,9	NA	NA	NA	NA	
0.0	NA	NA	NA	NA	NA	NA	
0.0	NA	3,3,8,10	24"	24"	24"	Brown, SILT and fine sand, some clay, trace gravel, moist to wet	
0.0	NA	NA	NA	NA	NA	SAA	
0.0	NA	10,12,10,13	24"	24"	24"	SAA	
0.0	NA	NA	NA	NA	NA	SAA	
0.0	NA	4,4,6,7	24"	24"	24"	SAA	
0.0	NA	NA	NA	NA	NA	SAA	
0.0	NA	4,5,5,7	24"	24"	24"	Brown, CLAY, trace silt, moist to wet	
0.0	NA	NA	NA	NA	NA	SAA	
0.0	NA	9,12,13,17	24"	24"	24"	SAA	
0.0	NA	NA	NA	NA	NA	SAA	
0.0	NA	11,11,13,15	24"	24"	24"	SAA	
0.0	NA	NA	NA	NA	NA	SAA	
0.0	NA	9,9,11,15	24"	24"	24"	SAA	
0.0	NA	NA	NA	NA	NA	SAA	
0.0	NA	NA	NA	NA	NA	Brown, medium SAND, some silt, some gravel, wet	
0.0	NA	NA	NA	NA	NA	SAA	
0.0	NA	NA	NA	NA	NA	SAA	
0.0	NA	NA	NA	NA	NA	SAA, Boring terminated	

Notes:
 Water Table
 NA Not Applicable
 bgs Below ground surface
 SAA Sam e as above

KLEINFELDER

1279 Route 300, Newburgh, New York, 12550
 Phone: (845) 567-6530 Fax: (845) 567-6542

**Boring Log
 SB-P1**

Project:	119502	Casing Elevation:	NA
Client:	sanofi-aventis	Total Depth:	40' BGS
Location:	755 Jefferson Road, Rochester, NY	Water Level:	NA
Boring ID:	SB-P1	Drilling Co.:	Paragon Drilling
Screen Length:	NA	Driller:	Justin N.
Diameter:	NA	Method:	Direct Push
PVC Type:	NA	Start Date:	12/22/10
Slot Size:	NA	End Date:	12/22/10
Casing Length:	NA	Notes:	* Denotes sample submitted for laboratory analysis
Diameter:	NA	Log by:	AW
		Checked by:	



Depth (ft.)	Sample ID	Sample Interval (feet)	PID Headspace (gpm)	Blows / 6"	Recovery / Penetration (inches)	Description	Depth (ft.)
1			0.0	NA	36"	Grass/organic material	1
2			0.0			Brown, SILT some fine to med sand, trace gravel, dry	2
3			0.0			SAA	3
4			0.0		12"	SAA	4
5			0.0			SAA, Moist	5
6			0.0			SAA	6
7			0.0			Brown, CLAY and silt, trace gravel, dry	7
8			0.0		48"	SAA	8
9			0.0			SAA	9
10			0.0			Brown, SILT and clay, trace gravel, dry	10
11			0.0			SAA	11
12			0.0		48"	SAA	12
13			0.0			SAA	13
14			0.0			SAA	14
15			0.0			SAA	15
16			0.0		48"	SAA	16
17			0.0			SAA	17
18			0.0			SAA	18
19			0.0			SAA	19
20			0.0			Gray, SILT and clay, trace fine to med sand, trace gravel, moist	20
21			65		48"	SAA	21
22			46			SAA	22
23			0.0			SAA	23
24			0.0			SAA	24
25			0.0		48"	SAA, moist to wet	25
26			0.0			SAA	26
27			6.9			SAA	27
28			14.5			SAA	28
29			20.2		48"	SAA	29
30			55.3			SAA	30
31			97			SAA	31
32	SB-P1 (32)*	31.5'-32'	116			SAA	32
33			14.1		48"	SAA, wet	33
34			0.0			SAA	34
35			0.0			SAA	35
36			0.0			SAA	36
37			0.0		48"	SAA	37
38			0.0			SAA	38
39			0.0			SAA	39
40	SB-P1 (40)*	39.5'-40'	0.0			SAA, boring terminated	40
41							41

Notes:
 Water Table
 NA Not Applicable
 bgs Below ground surface
 SAA Same as above

KLEINFELDER

1279 Route 300, Newburgh, New York, 12550
 Phone: (845) 567-6530 Fax: (845) 567-6542

Boring Log

Project:	119502	Casing Elevation:	NA
Client:	sanofi-aventis	Total Length:	40' BGS
Location:	755 Jefferson Road, Rochester, NY	Water Level:	NA
Boring ID:	SB-P2	Drilling Co.:	Paragon Drilling
Screen Length:	NA	Driller:	Doug H.
Diameter:	NA	Method:	Direct Push
PVC Type:	NA	Start Date:	12/22/10
Slot Size:	NA	End Date:	12/22/10
Casing Length:	NA	Notes:	* Denotes sample submitted for laboratory analysis, boring was drilled at a 45 deg angle
Diameter:	NA	Log by:	AW
		Checked by:	



Depth (ft.)	Sample ID	Sample Interval (feet)	PID Headspace (gpm)	Blows / 6'	Recovery / Penetration (inches)	Description	Depth (ft.)
1			0.0	NA	18"	Grass/organic material	1
2			0.0			Brown, SILT and clay, trace fine gravel, dry	2
3			0.0			SAA	3
4			0.0			SAA	4
5			0.0		27"	SAA	5
6			0.0			SAA	6
7			0.0			SAA	7
8			0.0			SAA	8
9			0.0			SAA	9
10			0.0		2"	Brown, SILT and clay, trace fine gravel, moist	10
11			0.0			NA, very little recovery	11
12			0.0			NA	12
13			0.0			NA	13
14			0.0			NA	14
15			0.0		2"	NA, very little recovery	15
16			0.0			NA	16
17			0.0			NA	17
18			0.0			NA	18
19			0.0			NA	19
20			0.0		60"	Brown, SILT, some clay, some gravel, moist to wet	20
21			0.0			SAA	21
22			0.0			SAA	22
23			0.0			SAA	23
24			0.0			SAA	24
25			0.0		60"	SAA	25
26			0.0			SAA	26
27			0.0			SAA	27
28			0.0			SAA	28
29			37			SAA	29
30			116		38"	SAA	30
31			345			SAA	31
32	SB-P2 (32)*	31.5'-32'	960			SAA	32
33			195			SAA	33
34			3.2			SAA	34
35			0.0		35"	SAA	35
36			1.9			SAA	36
37			0.0			SAA	37
38			0.0			SAA	38
39			0.0			SAA	39
40	SB-P2 (40)*	39.5'-40'	0.0			SAA, boring terminated	40
41							41

Notes:
 Water Table
 NA Not Applicable
 bgs Below ground surface
 SAA Same as above

KLEINFELDER

1279 Route 300, Newburgh, New York, 12550
 Phone: (845) 567-6530 Fax: (845) 567-6542

Boring Log

Project:	119502	Casing Elevation:	NA
Client:	sanofi-aventis	Total Length:	30' BGS
Location:	755 Jefferson Road, Rochester, NY	Water Level:	NA
Boring ID:	SB-P3	Drilling Co.:	Paragon Drilling
Screen Length:	NA	Driller:	Doug H.
Diameter:	NA	Method:	Direct Push
PVC Type:	NA	Start Date:	1/3/11
Slot Size:	NA	End Date:	1/3/11
Casing Length:	NA	Notes:	* Denotes sample submitted for laboratory analysis, boring was drilled at a 45 deg angle
Diameter:	NA	Log by:	AW
		Checked by:	



Depth (ft.)	Sample ID	Sample Interval (feet)	PID Headspace (gpm)	Blows / 6"	Recovery / Penetration (inches)	Description	Depth (ft.)
1			0.0	NA	18"	Grass/organic material	1
2			0.0			Brown, SILT and clay, trace fine gravel, dry	2
3			0.0			SAA	3
4			0.0			SAA	4
5			0.0		27"	SAA	5
6			0.0			SAA	6
7			0.0			SAA	7
8			0.0			SAA	8
9			0.0			SAA	9
10			0.0		2"	Brown, SILT and clay, trace fine gravel, moist	10
11			0.0			NA, very little recovery	11
12			0.0			NA	12
13			0.0			NA	13
14			0.0			NA	14
15			0.0		2"	NA, very little recovery	15
16			0.0			NA	16
17			0.0			NA	17
18			0.0			NA	18
19			0.0			NA	19
20			44.7		60"	Brown, SILT, some clay, some gravel, moist to wet	20
21			298			SAA	21
22			295			SAA	22
23			189			SAA	23
24	SB-P3 (24)*	23.5'-24'	314			SAA	24
25			45.9		60"	SAA	25
26			3.0			SAA	26
27			1.2			SAA	27
28			0.0			SAA	28
29			0.0			SAA	29
30	SB-P3 (30)*	29.5'-30'	0.0			SAA, boring terminated	30
							31
							32
							33
							34
							35
							36
							37
							38
							39
							40
							41

Notes:
 Water Table
 NA Not Applicable
 bgs Below ground surface
 SAA Same as above