Stuart Park Complex – Ultralife Battery

VILLAGE OF NEWARK, WAYNE COUNTY, NEW YORK

Site Management Plan

NYSDEC Site Number: V00178-8

Prepared for:
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2000 Technology Parkway
Newark, New York 14513

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Revisions to Final Approved Site Management Plan:

Revision #	Submitted Date	Summary of Revision	DEC Approval Date

JUNE 2011

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1.0 INTRODUCTION AND DESCRIPTION OF REMEDIAL PROGRAM

1.1 INTRODUCTION

This document is required as an element of the remedial program at Ultralife Corporation (hereinafter referred to as the "Site") under the New York State (NYS) Voluntary Cleanup Program (VCP) administered by New York State Department of Environmental Conservation (NYSDEC). The site was remediated in accordance with Voluntary Cleanup Agreement (VCA) #V00178-8, which was executed on January 8, 2001.

1.1.1 General

Ultralife Corporation (formerly known as Ultralife Batteries, Inc.), hereinafter referred to as Ultralife, entered into a VCA with the NYSDEC to remediate a 14.24-acre portion of a larger (approximately 67-acre) parcel located in Village of Newark, Wayne County. This VCA required the Remedial Party, Ultralife, to investigate and remediate contaminated media at the site. The original VCP site was 14.24 acres. As part of the remedy implemented at the site the VCP boundaries were expanded to include off-site acreage which increases the VCP site acreage to 14.41 acres. A figure showing the site location and boundaries of the14.41-acre portion of a larger (approximately 67-acre) parcel is provided in Figure 1. The boundaries of the site are more fully described in the metes and bounds site description that is part of the Deed Restriction, which is included in Appendix 9.

After completion of the remedial work described in the Remedial Action Work Plan, some contamination was left in the subsurface at this site, which is hereafter referred to as 'remaining contamination." This Site Management Plan (SMP) was prepared to manage remaining contamination at the site until the Deed Restriction is extinguished in accordance with ECL Article 71, Title 36. All reports associated with the site can be viewed by contacting the NYSDEC or its successor agency managing environmental issues in New York State.

This SMP was prepared by LaBella Associates, P.C. (LaBella), on behalf of Ultralife, in accordance with the requirements in NYSDEC DER-10 Technical Guidance for Site Investigation and Remediation, dated May, 2010, and the guidelines provided by NYSDEC. This SMP addresses the means for implementing the Institutional Controls (ICs) and Engineering Controls (ECs) required by the Deed Restriction for the site.

1.1.2 Purpose

The site contains contamination left after completion of the remedial action. Engineering Controls have been incorporated into the site remedy to control exposure to remaining contamination during the use of the site to ensure protection of public health and the environment. A Deed Restriction recorded with the Wayne County Clerk will require compliance with this SMP and all ECs and ICs placed on the site. The ICs place restrictions on site use, and mandate maintenance, monitoring and reporting measures for all ECs and ICs. This SMP specifies the methods necessary to ensure compliance with all ECs and ICs required by the Deed Restriction for contamination that remains at the site. This plan has been approved by the NYSDEC, and compliance with this plan is required by grantor of the Deed Restriction and the grantor's successors and assigns. This SMP may only be revised with the approval of the NYSDEC.

This SMP provides a detailed description of all procedures required to manage remaining contamination at the site after completion of the Remedial Action, including: (1) implementation and management of all Engineering and Institutional Controls; (2) media monitoring; and (3) performance of periodic inspections, certification of results, and submittal of Periodic Review Reports to NYSDEC.

To address these needs, this SMP includes: (1) an Engineering and Institutional Control Plan for implementation and management of EC/ICs; and (2) a Monitoring Plan for implementation of Site Monitoring.

This plan also includes a description of the Periodic Review Reports for periodic submittal of data, information, recommendations, and certifications to NYSDEC.

It is important to note that:

- This SMP details the site-specific implementation procedures that are required by the Deed Restriction. Failure to properly implement the SMP is a violation of the Deed Restriction, which is grounds for revocation of the Limited Liability Release;
- Failure to comply with this SMP is also a violation of Environmental Conservation Law, 6NYCRR Part 375 and the VCA #V00178-8 for the site, and thereby subject to applicable penalties.

1.1.3 Revisions

Revisions to this plan will be proposed in writing to the NYSDEC's project manager. 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.

1.2 SITE BACKGROUND

1.2.1 Site Location and Description

The site is located in the Village of Newark, Wayne County, New York and is identified as Tax ID Map 14 Parcel 499340. The current VCP Site consists of 14.41-acre portion of a larger (approximate 67-acre) tax parcel that is bounded to the north by vacant/undeveloped land, to the south by Silver Hill Road, to the east by vacant/undeveloped land, and to the west by Route 88. As stated in Section 1.1.1, the original VCP site was 14.24 acres. As part of the remedy implemented at the site the VCP boundaries were expanded to include off-site acreage which increases the VCP site

acreage to 14.41 acres. The VCP Site and larger parcel is a manufacturing Site. The VCP Site is improved with one approximate 117,000-square foot building. In addition to the building, property improvements include parking lots, paved access roads, and paved loading/unloading areas. The remainder of the VCP Site consists of grass, landscaped areas, and undeveloped vegetated and wooded land. The facility is located in a zoned industrial park (the Stuart Park Complex) situated in a primarily agricultural/rural and residential area. Figure 2 is an aerial photograph of the Site and illustrates the general Site features.

Storm water runoff from the property (including some roof drains) discharges to two (2) outfalls. Outfall #1 is located on the northern portion of the property and Outfall #2 is located on the eastern portion of the property as shown on Figure 2. Outfall #1 previously received non-contact cooling water; however, the non-contact cooling water consisted only of potable water and was redirected to the sanitary sewer in September 2008. Runoff is directed to the outfalls via a series of on-site catch basins with associated underground conduits, and/or surface channels. Flow from the two (2) outfalls is directed to a wetland area, which eventually joins Marbletown Creek.

1.2.2 Site History

Prior to 1968 the site consisted of undeveloped farm land. The Site was initially developed in 1968 by Sara Coventry as a corporate headquarters and distribution center. In the early 1980's Eastman Kodak purchased the Site and began a battery manufacturing operation. In 1991, Ultralife purchased the manufacturing operations from Eastman Kodak with Eastman Kodak retaining ownership of the facility. In 1998 the facility was purchased by Wayne County Industrial Development Agency (IDA) with Ultralife continuing operations as a tenant.

1.2.3 Geologic Conditions

Five overburden soil deposits were encountered and observed by GeoQuest during test pit explorations that include: Topsoil, a Fill Deposit, a buried Topsoil Deposit, a Lacustrine deposit, and a Glacial Till deposit. The Topsoil Deposit is approximately 0.5-feet to 1-foot thick and overlays the Fill Deposit at the majority of the test pit locations. This topsoil was placed over the Fill Deposit during construction of the facility. The description of the topsoil is dark brown SILT, trace medium to fine sand, with root fibers. The Fill Deposit is generally located below the topsoil and generally

overlays the Buried Topsoil Deposit. The Fill Deposit generally consist of approximately 3-feet of light brown gravel, some coarse to fine sand, little silt, trace clay, with root fibers. The Fill deposit appears to be regarded native soils from the Site similar to the glacial till in grain size that was reveled in the test pit explorations. Underlying the Fill deposit is a Buried Topsoil Deposit that may represent the original ground surface. The Buried Topsoil deposit is described as grey to black silt, some fine sand, with root fibers. The buried topsoil is approximately 1-foot thick. Underlying the Buried Topsoil Deposit is a Lacustrine Deposit described as green-grey fine sand, some silt. The lacustrine is approximately 0.5-feet thick. Below the Lacustrine Deposit is the Glacial Till deposit that is very dense and was difficult to excavate. The Glacial Till Deposit is generally described as light brown gravel, some coarse to fine sand, little silt, trace clay. Additional details on the geologic conditions can be found in the Remedial Investigation Report by GeoQuest Environmental, Inc.

The depth to groundwater at the Site ranges from approximately 0.5-feet to 6.55-feet below the ground surface based on the measurements made by GeoQuest. The groundwater flow direction is generally towards the north, based on the Lu Engineers Groundwater contour map dated July 18, 2001. Refer to Appendix 1 that represents the recent groundwater flow direction based on the well survey completed by Parrone Engineering.

1.3 SUMMARY OF REMEDIAL INVESTIGATION FINDINGS

A Remedial Investigation (RI) was performed to characterize the nature and extent of contamination at the site. The results of the RI are described in detail in the following reports:

- *Final Investigation Report (Revised and Amended), Ultralife Batteries, Inc. 2000 Technology Parkway, Newark, New York ID#V00178-8, Volume No. 1.,* dated December, 2008 and prepared by GeoQuest Environmental, Inc., (GeoQuest) 43 Legionnaire Drive, Rochester, New York.

Generally, the RI determined that the nature and extent of contaminants of concern at the Site included:

- Previous underground wastewater storage vault remedial work (see below for details) was effective and no further remediation was recommended.
- Soil types consist of topsoil, fill deposits, buried topsoil, a lacustrine deposit, and a glacial till deposit (no coal or ash was observed within test pits excavated).
- Depth to groundwater varied between 0.5 and 6.55-feet below ground surface (BGS) with groundwater flow direction generally to the north.
- Volatile organic compounds (VOCs) were not detected in photoionization detector (PID) headspace scans.
- Two areas of sediment impacted with polyaromatic hydrocarbons (PAHs) and heavy metals were identified (Outfall #1 and Outfall #2) and the nature and extent of such contaminants were delineated both on and off the defined VCP Site.
- The impacted sediments associated with the two (2) outfalls required remediation. Specifically, the RI Report indicated that the drainage ditch of Outfall #1 was impacted from the discharge point to 200 ft. downgradient and the drainage ditch of Outfall #2 was impacted from the discharge point to 110 ft. downgradient.

In a letter dated May 8, 2009 the NYSDEC approved the Final Investigation Report and requested a Remedial Action Selection Report and a Remedial Action Work Plan.

Summary of Cinder Block Drainage Vault Soil Removal

Ultralife implemented a soil remediation project to address the cinder block drainage vault adjacent to building 4000 between October and December 2003. Marcor Remediation, Inc., (Marcor) conducted the soil removal work, which consisted of removing 35 cubic yards (cy) of impacted soil and 550 gallons of water. These materials were disposed of off-site. Twelve confirmatory soil samples were collected from the bottom and sidewalls of the excavation. The samples were analyzed for VOCs, SVOCs and Target Analyte List (TAL) Metals. The confirmatory soil samples did not detect concentrations of contaminants above the NYSDEC Technical and Administrative Guidance Memorandum (TAGM) #4046 Recommended Soil Cleanup Objectives (RSCOs), with the exception of one soil sample from the bottom of the excavation that indicated zinc at a concentration of 53.4 parts per million (ppm), which is slightly above the Eastern USA Background of 50 ppm. *[Note: The*

TAGM 4046 criteria were being used based on the time this work was completed; however, the NYSDEC Part 375-6, effective December 14, 2006 indicate an unrestricted use criteria of 109 ppm for zinc.] Appendix 2 includes a figure and table from the Final Investigation Report that provide the location of the soil removal and confirmatory soil samples and the confirmatory soil sample results.

1.4 SUMMARY OF REMEDIAL ACTIONS

The site was remediated in accordance with the NYSDEC-approved Remedial Action Work Plan (RAWP) on March 31, 2010.

Based on the results of the RI, and the residual contamination remaining after the IRM Actions, the following Remedial Actions were performed at the site to address the remaining areas of concern (AOCs):

1. Excavation of sediment from the two outfall areas;
2. Execution and recording of a Deed Restriction to restrict land use and groundwater use at the site and prevent future exposure to any contamination remaining at the site.
3. Development and implementation of this Site Management Plan for long term management of remaining contamination as required by the Deed Restriction, which includes plans for: (1) Institutional and Engineering Controls, (2) monitoring, and (3) reporting .

Remedial activities were completed at the site in July and August 2010.

1.4.1 Removal of Contaminated Materials from the Site

The extent of the removal areas are detailed below. These areas are based on the RI Report findings and approval of the report by NYSDEC. In general, the 4 parts per million (ppm) of total PAHs and elevated metal concentrations were the criteria used for determining the extents of removal. In addition, Figures 4, 5A, and 5B illustrate the outfall removal areas. The areas of sediment removal are further defined below:

Sediments were excavated from Outfall #1 to approximately 3 feet bgs. for the first 20 feet below the outfall. Sediments were excavated to approximately 2 feet bgs. from the 20 ft. mark for the remaining length of the removal area (200 feet total length). Sediments were planned to be excavated to 3 feet bgs. from Outfall #2 for the first 20 feet; however, due to unanticipated shallow shale bedrock, the first 20-ft. were only excavated to approximately 1.5 feet bgs. Sediments were excavated to approximately 2-ft. bgs. from the 20 ft. mark until approximately 99 ft. from the outfall where shale was again encountered at 1.5 ft. bgs. The remaining length of the excavation for Outfall #2 (between 99 ft. and 119 ft. from the outfall) were excavated to the top of the shale.

Each outfall was excavated approximately 2-ft. on either side of the ditch centerline (i.e., removal width was approximately 4-ft. wide for the entire length of the excavation).

1.4.2 Remaining Contamination

This SMP is required due to several locations at the site that were identified with elevated concentrations of metals in fill material beneath the 2-ft. soil cover system and several areas where contaminants in soil and groundwater have not yet been remediated to unrestricted levels. The applicable data tables from the Final Investigation that provide these results and the applicable mapping from the Final Investigation that provide the location of these samples are included in Appendix 2.

2.0 ENGINEERING AND INSTITUTIONAL CONTROLS PLAN

2.1 INTRODUCTION

2.1.1 General

Since remaining contaminated soil and groundwater exists beneath the site, Engineering Controls and Institutional Controls (EC/ICs) are required to protect human health and the environment from direct exposure to these residual contaminants. This Engineering and Institutional Control Plan describes the procedures for the implementation and management of all EC/ICs at the site. The EC/IC Plan is one component of the SMP and is subject to revision by the NYSDEC.

2.1.2 Purpose

This plan provides:

- A description of all EC/ICs on the site;
- The basic implementation and intended role of each EC/IC;
- A description of the key components of the ICs set forth in the Deed Restriction;
- A description of the features to be evaluated during each required inspection and periodic review;
- A description of plans and procedures to be followed for implementation of EC/ICs, such as the implementation of the Excavation Work Plan for the proper handling of remaining contamination that may be disturbed during maintenance or redevelopment work on the site; and
- Any other provisions necessary to identify or establish methods for implementing the EC/ICs required by the site remedy, as determined by the NYSDEC.

2.2 ENGINEERING CONTROLS

2.2.1 Engineering Control Systems

2.2.1.1 Soil Cover System

Exposure to remaining contamination in soil/fill at the site is prevented by an existing soil cover system over the site. [Note: The soil cover system was not placed on the site separately, rather, the impacts left in-place are generally greater than 2-ft. in depth.] This cover system is comprised of approximately 24 inches of clean soil, asphalt pavement, concrete-covered sidewalks, and concrete building slabs. The Excavation Work Plan that appears in Appendix 3 outlines the procedures required to be implemented in the event the cover system is breached (i.e., excavations greater than 2-ft. in depth), penetrated or temporarily removed, and any underlying remaining contamination is disturbed. Procedures for the inspection and maintenance of this cover are provided in the Monitoring Plan included in Section 3 of this SMP.

2.3 INSTITUTIONAL CONTROLS

A series of Institutional Controls is required by the RAWP to: (1) implement, maintain and monitor Engineering Control systems; (2) prevent future exposure to remaining contamination by controlling disturbances of the subsurface contamination; and (3) limit the use and development of the site to commercial and industrial uses only. Adherence to these Institutional Controls on the site is required by the Deed Restriction and will be implemented under this Site Management Plan. The institutional controls for the site are:

- Compliance with the Deed Restriction and this SMP by the Grantor and the Grantor's successors and assigns.
- All Engineering Controls must be maintained and inspected as specified in this SMP.
- All Engineering Controls on the Controlled Property must be inspected at a frequency and in a manner defined in the SMP.

- Groundwater and other environmental or public health monitoring must be performed as defined in this SMP.
- Data and information pertinent to Site Management must be reported at the frequency and in a manner defined in this SMP.

Institutional Controls identified in the Deed Restriction may not be discontinued without an amendment to or extinguishment of the Deed Restriction. The Deed Restrictions for this property are identified below:

- The property can only be used for commercial and industrial purposes provided that the long-term Engineering and Institutional Controls included in this SMP are employed.
- The property may not be used for a higher level of use, such as unrestricted, residential, or restricted residential use without additional remediation and amendment of the Deed Restriction, as approved by the NYSDEC.
- All future ground intrusive activities greater than 2-ft. in depth within the VCP boundary must be conducted in accordance with this SMP.
- The use of the groundwater underlying the property is prohibited without NYSDEC approval and treatment rendering it safe for intended use.
- Vegetable gardens and farming on the property are prohibited.
- The site owner or remedial party will 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 access such Controlled Property, pursuant to the terms in the Deed Restriction, at any time in order to evaluate 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 an expert that the NYSDEC finds acceptable.

2.3.1 Excavation Work Plan

The site has been remediated for restricted commercial or industrial use. Any future intrusive work that will penetrate the soil cover system (i.e., greater than 2-ft. in depth), or encounter or disturb the remaining contamination, including any modifications or repairs to the existing cover system will be performed in compliance with the Excavation Work Plan (EWP) that is attached as Appendix 3 to this SMP. Any work conducted pursuant to the EWP must also be conducted in accordance with the procedures defined in a Health and Safety Plan (HASP) and Community Air Monitoring Plan (CAMP) prepared for the site. A sample HASP and CAMP is attached as Appendix 6 and 8, respectively, to this SMP that is in current compliance with DER-10, and 29 CFR 1910, 29 CFR 1926, and all other applicable Federal, State and local regulations. Based on future changes to State and Federal health and safety requirements, and specific methods employed by future contractors, the HASP and CAMP will be updated and re-submitted with the notification provided in Section A-1 of the EWP. Any intrusive construction work that will penetrate the soil cover system (i.e., greater than 2-ft. in depth) or encounter or disturb the remaining contamination, will be performed in compliance with the EWP, HASP, and CAMP, and will be included in the periodic inspection and certification reports submitted under the Inspections, Reporting, and Certifications (See Section 5). Shallow intrusive work (i.e., less than 2-ft. in depth) that does not penetrate the cover material or encounter the remaining contamination does not need to be documented or reported in the periodic inspections and certification reports.

The site owner and associated parties preparing the remedial documents submitted to the State, and parties performing this work, are completely responsible for the safe performance of all intrusive work, the structural integrity of excavations, proper disposal of excavation de-water, control of runoff from open excavations into remaining contamination, and for structures that may be affected by excavations (such as building foundations and bridge footings). The site owner will ensure that site development activities will not interfere with, or otherwise impair or compromise, the engineering controls described in this SMP.

2.4 INSPECTIONS AND NOTIFICATIONS

2.4.1 Inspections

Inspections of all remedial components installed at the site will be conducted at the frequency specified in the SMP Monitoring Plan schedule. A comprehensive site-wide inspection will be conducted annually, regardless of the frequency of the Periodic Review Report. The inspections will determine and document the following:

- Whether Engineering Controls continue to perform as designed;
- If these controls continue to be protective of human health and the environment;
- Compliance with requirements of this SMP and the Deed Restriction;
- Achievement of remedial performance criteria;
- Sampling and analysis of appropriate media during monitoring events;
- If site records are complete and up to date; and
- Changes, or needed changes, to the remedial or monitoring system.

Inspections will be conducted in accordance with the procedures set forth in the Monitoring Plan of this SMP (Section 3). The reporting requirements are outlined in Section 5 of this plan (Section 5).

If an emergency, such as a natural disaster or an unforeseen failure of any of the ECs occurs, an inspection of the site will be conducted within 5 days of the event to verify the effectiveness of the EC/ICs implemented at the site by a qualified environmental professional as determined by NYSDEC.

2.4.2 Notifications

Notifications will be submitted by the property owner to the NYSDEC as needed for the following reasons:

- 60-day advance notice of any proposed change in use as defined 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 greater than 2-ft. in depth.

- Notice within 48-hours of any damage or defect to the foundations structures that reduces or has the potential to reduce the effectiveness of the Engineering Controls and likewise any action to be taken to mitigate the damage or defect.
- Verbal notice by noon of the following day of any emergency, such as a fire, flood, or earthquake that reduces or has the potential to reduce the effectiveness of the Engineering Controls in place at the site, with written confirmation within 7 days that includes a summary of actions taken, or to be taken, and the potential impact to the environment and the public.
- 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 and shall describe and document actions taken to restore the effectiveness of the ECs.

Any change in the ownership of the site or the responsibility for implementing this SMP will include 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.
- Within 15 days after the transfer of all or part of the site, the new owner's name, contact representative, and contact information will be confirmed in writing.

2.5 CONTINGENCY PLAN

Emergencies may include injury to personnel, fire or explosion, environmental release, or serious weather conditions.

2.5.1 Emergency Telephone Numbers

In the event of any environmentally related situation or unplanned occurrence requiring assistance the Owner or Owner's representative(s) should contact the appropriate party from the contact list below. For emergencies, appropriate emergency response personnel should be contacted. Prompt contact should also be made to the

Ultralife Director of EHS. These emergency contact lists must be maintained in an easily accessible location at the site.

Table 1: Emergency Contact Numbers

Medical, Fire, and Police:	911
One Call Center:	(800) 272-4480 (3 day notice required for utility markout)
Finger Lakes Poison Control:	585-273-3854
Pollution Toxic Chemical Oil Spills:	(800) 424-8802
NYSDEC Spills Hotline	(800) 457-7362

Table 2: Contact Numbers

John Diggory	(315) 332-7100
Peter Comerford	(315) 332-7100
Richard Marino	(315) 332-7100

** Note: Contact numbers subject to change and should be updated as necessary*

2.5.2 Map and Directions to Nearest Health Facility

Site Location: 2000 Technology Parkway, Newark, New York

Nearest Hospital Name: Newark-Wayne Community Hospital

Hospital Location: 1200 Driving Park Avenue, Newark, New York

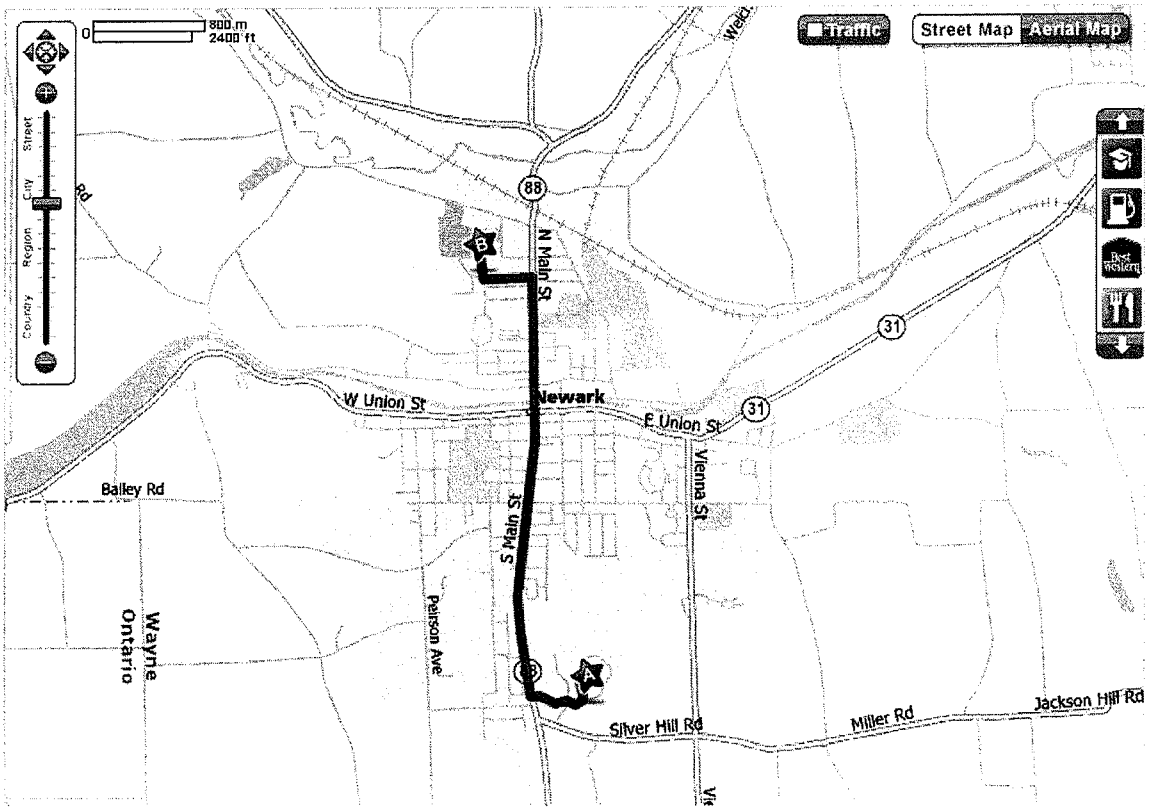
Hospital Telephone: 315-332-2022

Directions to the Hospital:

1. Start out going South on Technology Parkway – approximately 500 ft.
2. At the traffic circle, take the 2nd exit and stay on Technology Parkway – 0.2 mi.
3. Turn right at S. Main St/NY-88 – 2.3 mi.
4. Turn left at Stuerwald Avenue – 0.2 mi
5. Turn right at Driving Park Avenue – 0.2 mi.
6. End at 1200 Driving Park Avenue, Newark, New York.

Total Distance: Approximately 2.9 mi.

Total Estimated Time: Approximately 8 minutes.



2.5.3 Response Procedures

As appropriate, the fire department and other emergency response group will be notified immediately by telephone of the emergency. The emergency telephone number list is found at the beginning of this Contingency Plan (Table 1). The list will also posted prominently at the site and made readily available to all personnel at all times.

3.0 SITE MONITORING PLAN

3.1 INTRODUCTION

3.1.1 General

The Monitoring Plan describes the measures for evaluating the performance and effectiveness of the remedy to reduce or mitigate contamination at the site, the soil cover system, and all affected site media identified below. This Monitoring Plan may only be revised with the approval of NYSDEC.

3.1.2 Purpose and Schedule

This Monitoring Plan describes the methods to be used for:

- Sampling and analysis of all appropriate media (e.g., groundwater and sediments);
- Assessing compliance with applicable NYSDEC standards, criteria, and guidance, particularly ambient groundwater standards and Part 375 SCOs for soil;
- Assessing achievement of the remedial performance criteria;
- 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., monitoring 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.

Monitoring of the outfall remedy performance and overall reduction in contamination on-site will be conducted for the first year and will occur one month, six months, and one year after completion of the outfall remedy. Annual groundwater monitoring will occur for two (2) years. The frequency therafter will be determined by NYSDEC.

Table 3: Monitoring/Inspection Schedule

Monitoring Program	Frequency*	Matrix	Analysis
Groundwater	Annually for 2 years	Liquid	TAL Metals
Sediment	One Sampling Event One Year After Remedy implementation	Sediment	TAL Metals TCL SVOCs + TICs
Vegetative Cover	1 month, 6 months, 1 year after Remedy Implementation	NA	NA

* The frequency of events will be conducted as specified unless otherwise approved by NYSDEC and NYSDOH

3.2 SOIL COVER SYSTEM MONITORING

The soil cover system will be monitored throughout the year by adherence to the Excavation Work Plan. An annual inspection will be conducted by a walk-through inspection of the VCP Site to confirm conditions have not changed throughout the year.

3.3 MEDIA MONITORING PROGRAM

The following media will be monitored at the frequency specified:

- Vegetative Cover Restoration Monitoring: The vegetative cover will be monitored at 1-month, 6-months and 1-year after completion of the soil/sediment removal work in the banks around the Outfall # 1 and #2 excavations. The details of this monitoring are identified in Section 3.3.1 below.
- Sediment Monitoring: 1-year after completion of the sediment removal work, the sediment that has accumulated in the bed of the Outfall #1 and #2 will be sampled as detailed in Section 3.3.2 below.
- Groundwater Monitoring: Groundwater will be sampled annually for two (2) years as detailed in Section 3.3.3 below.

3.3.1 Vegetative Cover Restoration Monitoring

As identified in the RAWP, the following monitoring will be performed for the vegetative cover restoration. The bank stability and vegetative community composition (species and density) will be monitored to ensure that Outfall ditch restoration establishes an initial vegetative cover (90% cover by end of first year), maintains slope stability and reestablishes the local plants. The monitoring will be accomplished by visual observation of each restoration area. The restoration areas will be photographed for documentation and submitted in summary letter to NYSDEC after each monitoring event. In the event that restoration (vegetative cover incomplete or slopes are not stable) then appropriate actions will be implemented (e.g., erosion controls, additional topsoil and seeding, etc.). The monitoring will be accomplished by observing the restoration areas at the 1 month, 6 month, and 1 year interval after the remedy has been implemented.

3.3.2 Sediment Monitoring

Sediment samples will be collected one year after the sediment removal work to evaluate the effectiveness of the Sediment Removal remedial work. Each outfall will have the following sediment sampling completed:

- Collection of 5 sediment samples down the centerline of the drainage ditch. One sample will be collected from the discharge point of the outfall (i.e., start of removal area) and one sample will be collected from the end of the removal area – Outfall #1 200 feet from discharge point and Outfall #2 110 feet from discharge point. The remaining three samples will be collected equidistance from the outfall discharge point to the end of the removal area.
- Sediment samples will be collected from 0-6 inches in depth.
- Samples will be placed in laboratory cleaned 4-ounce jars and submitted under chain of custody to a New York State Department of Health (NYSDOH) Environmental Laboratory Approval Program (ELAP) certified laboratory for analysis of Target Compound List (TCL) Semi-Volatile Organic Compounds (SVOCs) including 20 Tentatively Identified Compounds (TICs) using United States Environmental Protection Agency (USEPA) Method 8270 and Target Analyte List (TAL) Metals using USEPA Method 6000/7000 series.
- The laboratory results will be reported in Analytical Services Protocol (ASP) Category B Deliverables data package and a Data Usability Summary Report (DUSR) will be completed in accordance with NYSDEC's DER-10 Appendix 2B.
- A letter report will be submitted to NYSDEC and NYSDOH to document the sampling work and the laboratory results will be compared to the applicable criteria. The submittal will also include the DUSR and the laboratory data package on compact disc.

3.3.3 Groundwater Monitoring

Groundwater monitoring will be performed annually for two (2) years on seven (7) existing groundwater monitoring wells (refer to Appendix 1 for monitoring well location map and monitoring well construction logs). The sampling frequency may be modified with the approval NYSDEC. The SMP will be modified to reflect changes in sampling plans approved by NYSDEC.

The depth to groundwater ranges from 0.5 to 6.55 feet below ground surface. Groundwater flow direction is generally towards the north. The sampling protocols and reporting are described below.

Low flow groundwater sampling methodologies will be implemented in order to obtain a representative sample of current groundwater conditions at the site. In order to accomplish this task, the following steps will be taken:

- Initially, static water levels will be collected using a water level measuring device(s) capable of measuring to 0.01 foot accuracy for evaluating the groundwater contours at the Site.
- Subsequent to collecting groundwater elevations, low flow purging of the monitoring wells will include the collection of water quality indicator parameters. Water quality indicator parameters will be recorded at five (5)-minute intervals during the purging of the well. These water quality indicator parameters will include:
  - Water Level Drawdown
  - Temperature
  - pH
  - Dissolved Oxygen
  - Specific Conductance
  - Oxidation Reduction Potential
  - Turbidity

- Groundwater sampling will commence once the groundwater quality indicator parameters have stabilized for at least three (3) consecutive readings for the following parameters:
    - Water Level Drawdown: <0.3'
    - Temperature: +/- 3%
    - pH:+/- 0.1unit
    - Dissolved Oxygen: +/-10%
    - Specific Conductance: +/-3%
    - Oxidation Reduction Potential: +/-10 millivolts
    - Turbidity: +/-10% for values greater than 1 NTU
- After chemical indicator and drawdown parameters have stabilized sampling can begin.
- Each sample collected will be properly labeled.
- After collection of the samples, the pump tubing can be dedicated to the well for re-sampling (by hanging the tubing inside the well), decontaminated, or properly discarded.
- The monitoring well will be secured.
- Any reusable low flow groundwater sampling equipment will be decontaminated after each monitoring well prior to sampling additional wells at the Site.
- The samples will be submitted to a NYSDOH ELAP certified laboratory for the parameters tested under chain of custody. Groundwater samples will be analyzed for Target Analyte List (TAL) Metals using United States Environmental Protection Agency (USEPA) Method 6010 and 7471 (mercury).
- The groundwater results will be provided in an ASP Category B deliverables data package and a DUSR will be completed to evaluate the usability of the data in accordance with DER-10 Appendix 2B.

All monitoring well sampling activities will be recorded in a field book and a groundwater-sampling log presented in Appendix 4. Other observations (e.g., well integrity) will be noted on the well sampling log. The well sampling log will serve as the inspection form for the groundwater monitoring well network and will be included with the groundwater monitoring reports.

3.3.3.1 Monitoring Well Repairs, Replacement and Decommissioning

If biofouling or silt accumulation occurs in the 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.

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, and the repair or decommissioning and replacement process will be documented in the subsequent Periodic Review Report. Well decommissioning without replacement will be done only with the prior approval of NYSDEC. Well decommissioning and abandonment will be performed in accordance with NYSDEC DER CP-43: Commissioner's Policy on Groundwater Monitoring Well Decommissioning. Monitoring wells that are decommissioned because they have been rendered unusable will be reinstalled in the nearest available location, unless otherwise approved by the NYSDEC.

3.4 SITE-WIDE INSPECTION

Site-wide inspections will be performed on a regular schedule at a minimum of once a year. Site-wide inspections will also be performed after all severe weather conditions that may affect Engineering Controls or monitoring devices (e.g., groundwater monitoring wells). During these inspections, an inspection form will be completed (Appendix 7). The form will compile sufficient information to assess the following:

- Compliance with all ICs, including site usage;
- An evaluation of the condition and continued effectiveness of ECs;

- General site conditions at the time of the inspection;
- The site management activities being conducted including, where appropriate, confirmation sampling and a health and safety inspection; and
- Confirm that site records are up to date.

3.5 MONITORING QUALITY ASSURANCE/QUALITY CONTROL

All sampling and analyses will be performed in accordance with the requirements of the Quality Assurance Project Plan (QAPP) prepared for the site (Appendix 5). Main Components of the QAPP include:

- QA/QC Objectives for Data Measurement
- Measurement of Data Quality
- QC Targets
- Sampling Program:
    - Sample containers will be properly washed, decontaminated, and appropriate preservative will be added (if applicable) prior to their use by the analytical laboratory. Containers with preservative will be tagged as such.
    - Sample holding times will be in accordance with the NYSDEC ASP requirements.
    - Field QC samples (e.g., trip blanks, coded field duplicates, and matrix spike/matrix spike duplicates) will be collected as necessary.
- Sample, Containers, Tracking and Custody
- Sample Handling, Packaging, and Shipping
- Calibration Procedures and Frequency:
    - All field analytical equipment will be calibrated immediately prior to each day's use. Calibration procedures will conform to manufacturer's standard instructions.

- The laboratory will follow all calibration procedures and schedules as specified in USEPA SW-846 and subsequent updates that apply to the instruments used for the analytical methods.

- Chain of Custody
- Groundwater Sampling Procedures
- Decontamination and Management of Sampling Derived Waste
- Preparation of a Data Usability Summary Report (DUSR), which will present the results of data validation, including a summary assessment of laboratory data packages, sample preservation and chain of custody procedures, and a summary assessment of precision, accuracy, representativeness, comparability, and completeness for each analytical method
- Documentation and Corrections to Documentation
- Field Instrumentation

3.6 MONITORING REPORTING REQUIREMENTS

Forms and any other information generated during regular monitoring events and inspections will be kept on file on-site. All forms, and other relevant reporting formats used during the monitoring/inspection events, will be (1) subject to approval by NYSDEC and (2) submitted at the time of the Periodic Review Report, as specified in Section 5.0 of this SMP.

All monitoring results will be reported to NYSDEC on a periodic basis in the Periodic Review Report. A letter report will also be prepared subsequent to each sampling event. The report will include, at a minimum:

- Date of event;
- Personnel conducting sampling;
- Description of the activities performed;
- Type of samples collected (e.g., groundwater, sediment);
- Copies of all field forms completed (e.g., well sampling logs, chain-of-custody documentation);

- Sampling results in comparison 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 points sampled to be submitted electronically in the NYSDEC-identified format;
- Any observations, conclusions, or recommendations; and
- A determination as to whether groundwater conditions have changed since the last reporting event.

Data will be reported in hard copy or digital format as determined by NYSDEC. A summary of the monitoring program deliverables are summarized in Table 4 below.

Table 4: Schedule of Monitoring/Inspection Reports

Task	Reporting Frequency*
Sediment Sampling	One Sampling Event One Year After Remedy implementation
Vegetative Cover Inspections	1 month, 6 months, 1 year after implementation of the remedy
Groundwater Sampling	Annually for 2 years
Soil Cover System Inspeciton	Annually

* The frequency of events will be conducted as specified until otherwise approved by NYSDEC

4.0 OPERATION AND MAINTENANCE PLAN

4.1 INTRODUCTION

The final site remedy does not rely on any mechanical systems to protect public health and the environment; therefore, the operation and maintenance of such mechanical remedial components is not included in this SMP.

5.0 INSPECTIONS, REPORTING AND CERTIFICATIONS

5.1 SITE INSPECTIONS

5.1.1 Inspection Frequency

All inspections will be conducted at the frequency specified in the schedules provided in Section 3 Monitoring Plan of this SMP. At a minimum, a site-wide inspection will be conducted annually. Inspections of remedial components will also be conducted whenever a severe condition has taken place, such as an erosion or flooding event that may affect the ECs. The inspections will determine and document the following:

- Whether Engineering Controls continue to perform as designed;
- If these controls continue to be protective of human health and the environment;
- Compliance with requirements of this SMP and the Deed Restriction; and
- If site records are complete and up to date.

The annual inspection will be documented by the certification presented in Section 5.2.

5.1.2 Inspection Forms, Sampling Data, and Maintenance Reports

All inspections and monitoring events will be recorded on the appropriate forms contained in the SMP's appendices. Additionally, a general site-wide inspection form will be completed during the site-wide inspection (see Appendix 7). These forms are subject to NYSDEC revision. All applicable inspection forms and other records, including all media sampling data, generated for the site during the reporting period will be provided in electronic format to NYSDEC in the Periodic Review Report.

5.1.3 Evaluation of Records and Reporting

The results of the inspection and site monitoring data will be evaluated as part of the EC/IC certification to confirm that the:

- EC/ICs are in place, are performing properly, and remain effective
- The Monitoring Plan is being implemented
- Operation and maintenance activities are being conducted properly; and, based on the above items
- The site remedy continues to be protective of public health and the environment and is performing as designed in the RAWP and FER

5.1.4 Reporting Schedule

The following table identifies the reporting schedule for the site.

Table 5: Reporting Schedule

Reporting Type	Approximate due date	Description
Vegetative Bank Cover	1-month, 6-months and 1-yr after sediment removal completed	Letter report with pictures
Sediment Sampling	1-yr after sediment removal completed	Letter report with figure showing locations and laboratory data attached
Groundwater sampling	Annually for the 2 sampling events	Letter report with figure showing well locations, groundwater flow direction and laboratory data attached
Annual Inspection/Certification	Annually	Certification identified in Section 5.2

5.2 CERTIFICATION OF ENGINEERING AND INSTITUTIONAL CONTROLS

After the last inspection of the reporting period, a qualified environmental professional will prepare the following certification:

The following certification will be provided to the NYSDEC annually:

For each institutional or engineering control identified for the site, I certify that all of the following statements are true:

- The inspection of the site to confirm the effectiveness of the institutional and engineering controls required by the remedial program was performed under my direction;
- The institutional control and/or engineering control employed at this site is unchanged from the date the control was put in place, or last approved by the Department;
- Nothing has occurred that would constitute a violation or failure to comply with any site management plan for this control;
- Nothing has occurred that would impair the ability of the control to protect the public health and environment;
- Access to the site will continue to be provided to the Department to evaluate the remedy, including access to evaluate the continued maintenance of the control;
- Use of the site is compliant with the deed restriction;
- To the best of my knowledge and belief, the work and conclusions described in this certification are in accordance with the requirements of the site remedial program;
- The information presented in this report is accurate and complete; and
- 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 the Owner's Designated Site Representative for the site.

5.3 PERIODIC REVIEW REPORT

A Periodic Review Report will be submitted to the Department annually, beginning1 year after the Limited Liability Release Letter 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 site described in the Metes and Bounds. The report will be prepared in accordance with NYSDEC DER-10 and submitted within 45 days of the end of each certification period. Media sampling results will also incorporated into the Periodic Review Report. The report will include:

- Identification, assessment and certification of all ECs/ICs required by the remedy for the site;
- Results of the required annual site inspections and severe condition inspections, if applicable;
- All applicable inspection forms and other records generated for the site during the reporting period in electronic format;
- A summary of any discharge monitoring data and/or information generated during the reporting period with comments and conclusions;
- Data summary tables and graphical representations of contaminants of concern by media (e.g., sediment, groundwater), 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 analyses, copies of all laboratory data sheets, and the required laboratory data deliverables for all samples collected during the reporting period will be submitted electronically in a NYSDEC-approved format;
- A site evaluation, which includes the following:
    - The compliance of the remedy with the requirements of the site-specific RAWP;

- Any new conclusions or observations regarding site contamination based on inspections or data generated by the Monitoring Plan for the media being monitored;
- Recommendations regarding any necessary changes to the remedy and/or Monitoring Plan; and
- The overall performance and effectiveness of the remedy.

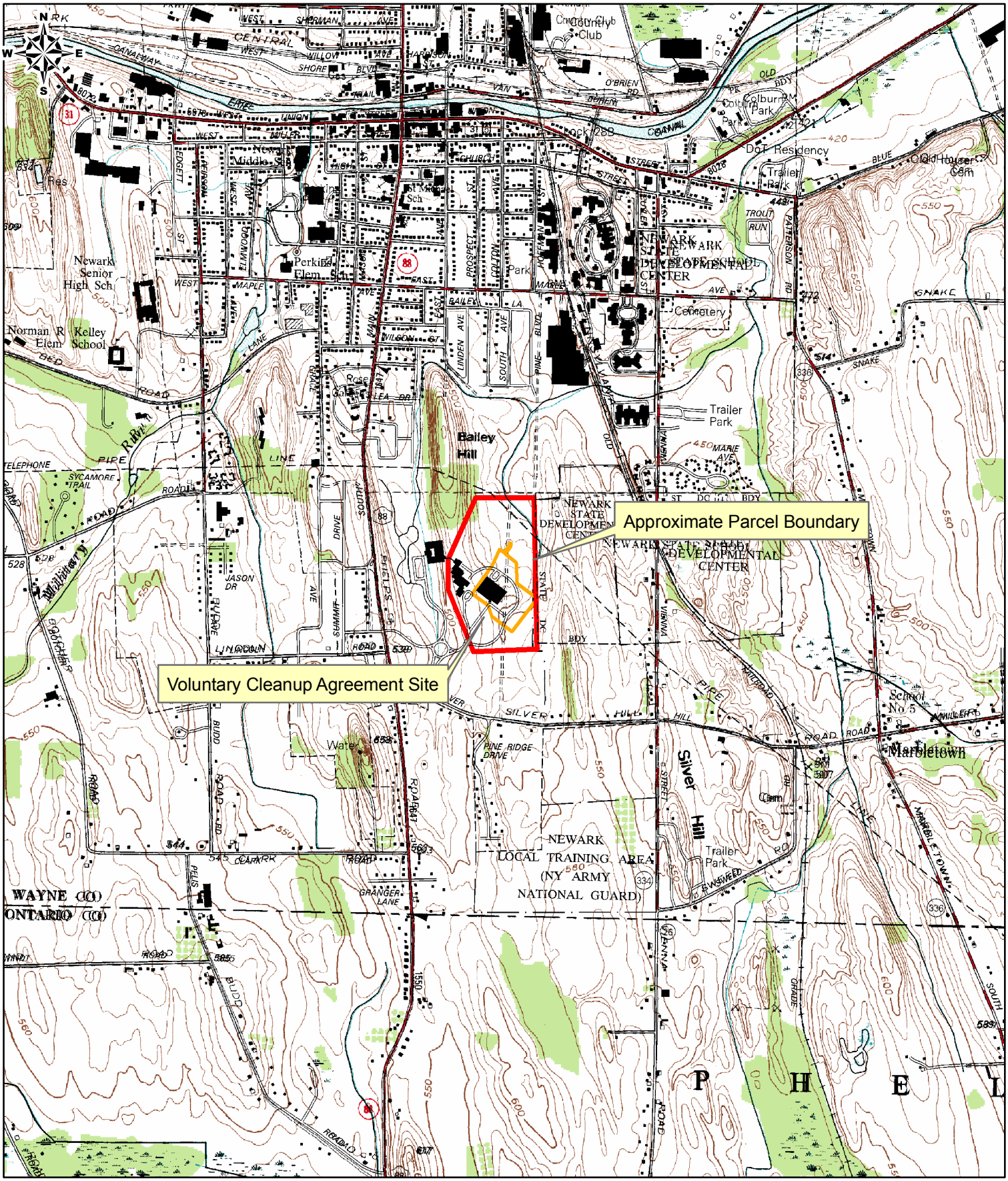
The Periodic Review Report will be submitted, in hard-copy format, to the NYSDEC Regional Office in which the site is located, and in electronic format to NYSDEC Regional Office and the NYSDOH Bureau of Environmental Exposure Investigation.

5.4 CORRECTIVE MEASURES PLAN

If any component of the remedy is found to have failed, or if the periodic certification cannot be provided due to the failure of an institutional or engineering 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.

LABELLA
LaBella Associates, P.C.
300 State Street
Rochester, New York 14614

Figures



PROJECT/DRAWING NUMBER

209025

FIGURE 1

DRAWING TITLE

SITE LOCATION WITH USGS 7.5 MINUTE TOPO MAP NEWARK QUAD

ISSUED FOR: REVIEW

DATE: 5/15/09

DESIGNED BY: RCN

DRAWN BY: RCN

REVIEWED BY: DPN

PROJECT/CLIENT

Ultralife Batteries
Site Management Plan

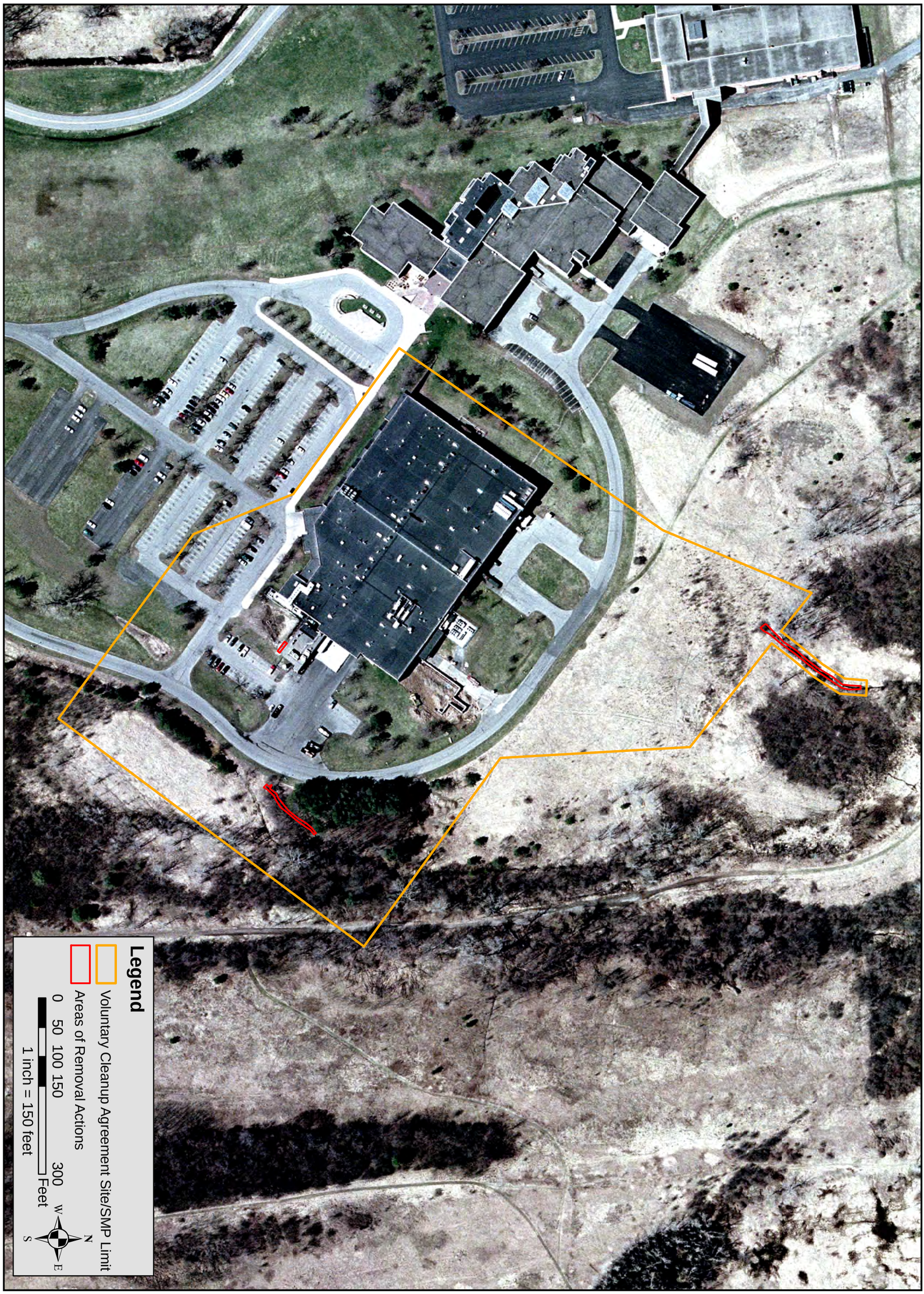
1350 Route 88 South
Newark, New York

LABELLA Associates, P.C.
Engineering
Architecture
Environmental
Planning
300 STATE STREET
ROCHESTER, NY 14614
P: (585) 454-6110
F: (585)454-3066
www.labellapc.com

0 0.25 0.5 Miles

Y:\Ultralife Corporation\209025\Drawings\SMP\Figure 1 - USGS SMP (IPJ 2011-1-04).mxd 1/6/2011 @ 1:52:26 PM

Y:\Ultralife Corporation\209025\Drawings\SMP\Figure 2 (SMP) Aerial Photograph with Pertinent Site Features (IPJ 2011-01-11).mxd 3/7/2011 @ 4:39:19 PM



PROJECT/DRAWING NUMBER

209025

FIGURE 2

DRAWING TITLE

Aerial Photograph with Pertinent Site Features

ISSUED FOR: FINAL

DATE: 01/11/2011

DESIGNED BY: IPJ

DRAWN BY: IPJ

REVIEWED BY: DPN

PROJECT/CLIENT

Ultralife Batteries
Site Management Plan

NYSDEC Site No. V00178

1350 Route 88 South
Newark, New York

LABELLA Associates, P.C.
Engineering
Architecture
Environmental
Planning

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REFERENCES

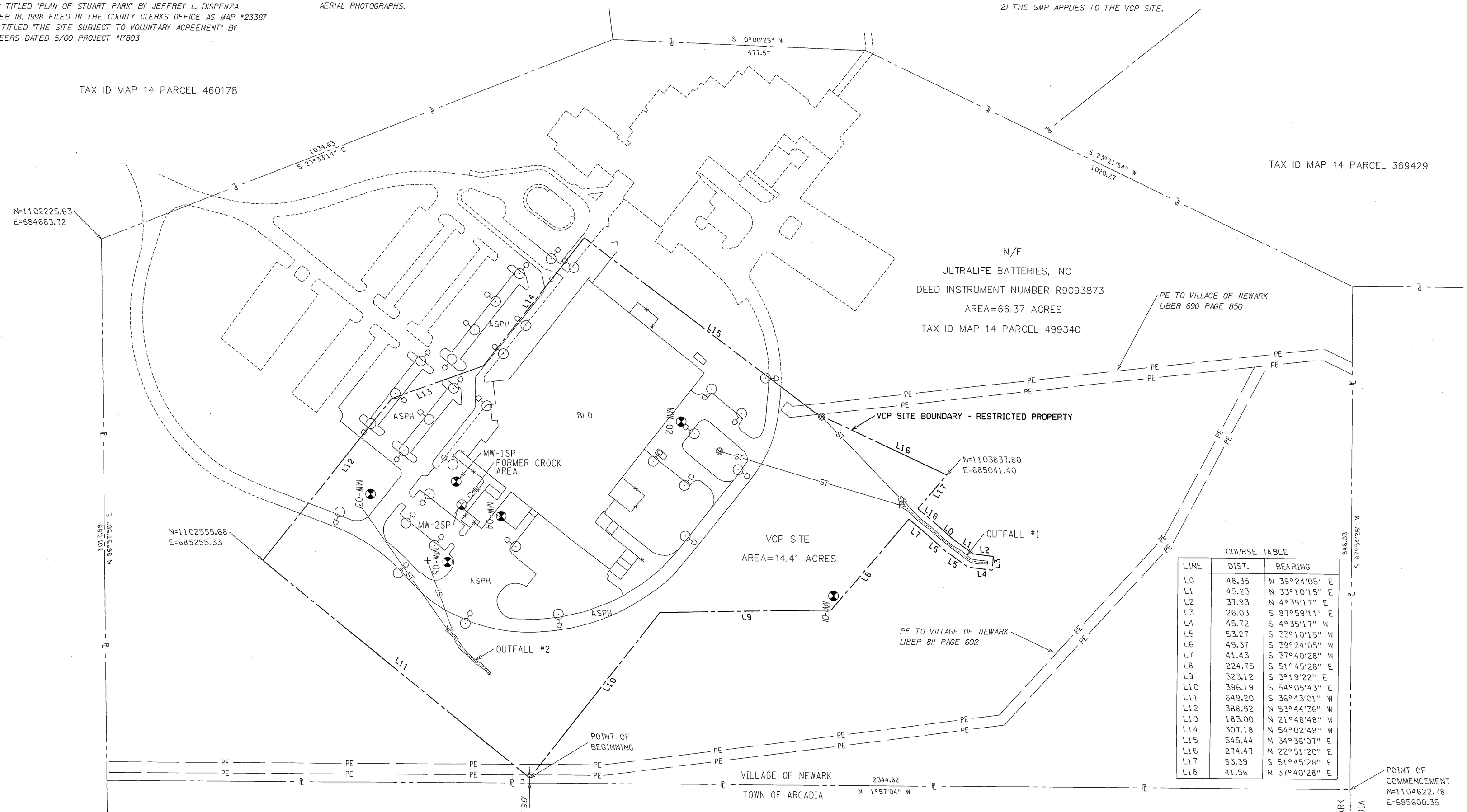
1) VILLAGE OF NEWARK TAX MAP NO. 14 AND 18.
2) DRAWING TITLED "REAL PROPERTY SUBDIVISION PLAT" BY FISHER ASSOC. DATE 4/00 FILED IN THE COUNTY CLERKS OFFICE AS MAP #27364 AND 27365
3) DRAWING TITLED "PLAN OF LANDS OWNED BY WAYNE COUNTY IDA' BY KOCHER SURVEYING, PC DATE 12-19-05 FILED IN THE COUNTY CLERKS OFFICE AS MAP #27366
3) DRAWING TITLED "PLAN OF STUART PARK" BY JEFFREY L. DISPENZA DATE FEB 18, 1998 FILED IN THE COUNTY CLERKS OFFICE AS MAP #23387
4) DRAWING TITLED "THE SITE SUBJECT TO VOLUNTARY AGREEMENT" BY LU ENGINEERS DATED 5/00 PROJECT #17803

SURVEY NOTES

1) THE HORIZONTAL DATUM IS REFERENCED TO THE NEW YORK STATE PLANE COORDINATE SYSTEM CENTRAL ZONE NAD 83 (1996).
2) NO ABSTRACT OF TITLE PROVIDED
3) VOLUNTARY AGREEMENT LINE ESTABLISHED BY FIELD SURVEY AND REF # 4
4) SITE FEATURES SHOWN WITH IN THE VOLUNTARY AGREEMENT LINE WERE LOCATED BY AN INSTRUMENT SURVEY. ALL OTHER FEATURES WERE DIGITIZED FROM AERIAL PHOTOGRAPHS.

SITE NOTES

1) THE ENGINEERING AND INSTITUTIONAL CONTROLS FOR THIS DEED RESTRICTION ARE SET FORTH IN THE SITE MANAGEMENT PLAN (SMP). A COPY OF THE SMP MUST BE OBTAINED BY ANY PARTY WITH AN INTEREST IN THE PROPERTY. THE SMP CAN BE OBTAINED FROM NYS DEPARTMENT OF ENVIRONMENTAL CONSERVATION, DIVISION OF ENVIRONMENTAL REMEDIATION, SITE CONTROL SECTION, 625 BROADWAY, ALBANY, NY 12233 OR AT DERWEB@GW.DEC.STATE.NY.US.
2) THE SMP APPLIES TO THE VCP SITE.



COURSE TABLE

LINE	DIST.	BEARING
L0	48.35	N 39°24'05" E
L1	45.23	N 33°10'15" E
L2	37.93	N 4°35'17" E
L3	26.03	S 87°59'11" E
L4	45.72	S 4°35'17" W
L5	53.27	S 33°10'15" W
L6	49.37	S 39°24'05" W
L7	41.43	S 37°40'28" W
L8	224.75	S 51°45'28" E
L9	323.12	S 3°19'22" E
L10	396.19	S 54°05'43" E
L11	649.20	S 36°43'01" W
L12	388.92	N 53°44'36" W
L13	183.00	N 21°48'48" W
L14	307.18	N 54°02'48" W
L15	545.44	N 34°36'07" E
L16	274.47	N 22°51'20" E
L17	83.39	S 51°45'28" E
L18	41.56	N 37°40'28" E

VCP BOUNDARY DESCRIPTION

COMMENCING AT THE NORTHEAST CORNER OF LANDS NOW OR FORMERLY OF ULTRALIFE BATTERIES, INC TAX ID MAP 14 PARCEL 499340, THENCE:
1) SOUTHERLY ALONG THE EASTERLY BOUNDARY OF SAID LANDS A DISTANCE OF 1547.3 FEET TO A POINT, THENCE:
2) WESTERLY ON A LINE PERPENDICULAR TO COURSE 1 A DISTANCE OF 9.6 FEET TO THE POINT OF BEGINNING, THENCE:
3) S 36°43'01" W A DISTANCE OF 649.20 FEET TO A ANGLE POINT, THENCE:
4) N 53°44'36" W A DISTANCE OF 388.92 FEET TO A ANGLE POINT, THENCE:
5) N 21°48'48" W A DISTANCE OF 183.00 FEET TO A ANGLE POINT, THENCE:
6) N 54°02'48" W A DISTANCE OF 307.18 FEET TO A ANGLE POINT, THENCE:
7) N 34°36'07" E A DISTANCE OF 545.44 FEET TO A ANGLE POINT, THENCE:
8) N 22°51'20" E A DISTANCE OF 274.47 FEET TO A ANGLE POINT, THENCE:
9) S 51°45'28" E A DISTANCE OF 83.39 FEET TO A ANGLE POINT, THENCE:
10) N 37°40'28" E A DISTANCE OF 41.56 FEET TO A ANGLE POINT, THENCE:
11) N 39°24'05" E A DISTANCE OF 48.35 FEET TO A ANGLE POINT, THENCE:
12) N 33°10'15" E A DISTANCE OF 45.23 FEET TO A ANGLE POINT, THENCE:
13) N 4°35'17" E A DISTANCE OF 37.93 FEET TO A ANGLE POINT, THENCE:
14) S 87°59'11" E A DISTANCE OF 26.03 FEET TO A ANGLE POINT, THENCE:
15) S 4°35'17" W A DISTANCE OF 45.72 FEET TO A ANGLE POINT, THENCE:
16) S 33°10'15" W A DISTANCE OF 53.27 FEET TO A ANGLE POINT, THENCE:
17) S 39°24'05" W A DISTANCE OF 49.37 FEET TO A ANGLE POINT, THENCE:
18) S 37°40'28" W A DISTANCE OF 41.43 FEET TO A ANGLE POINT, THENCE:
19) S 51°45'28" E A DISTANCE OF 224.75 FEET TO A ANGLE POINT, THENCE:
20) S 3°19'22" E A DISTANCE OF 323.12 FEET TO A ANGLE POINT, THENCE:
21) S 54°05'43" E A DISTANCE OF 396.19 FEET TO THE POINT OF BEGINNING.

THE ABOVE DESCRIBED PARCEL CONTAINS 14.41 ACRES (627566 SQ. FT.)

NORTH
0 100 200 300
SCALE: 1"=100'

STATE OF NEW YORK
MICHAEL W. HALEY
049788
LICENSED LAND SURVEYOR

WE, LABELLA ASSOCIATES PC, CERTIFY THAT THIS MAP WAS PREPARED USING REFERENCE MATERIAL AS LISTED HEREON AND FROM FIELD NOTES OF AN INSTRUMENT SURVEY COMPLETED AUGUST, 2010. THESE PARCELS ARE SUBJECT TO ANY EASEMENTS OR ENCUMBRANCES OF RECORD.

MICHAEL W. HALEY PLS 4/6/11
MICHAEL W. HALEY PLS
NYS PLS NO. 049788

NO.	DATE	BY	REVISION
1			
2			
3			
4			
5			
6			

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PROJECT/CLIENT
ULTRALIFE BATTERIES
SITE MANAGEMENT PLAN
1350 ROUTE 88 SOUTH
NEWARK, NEW YORK

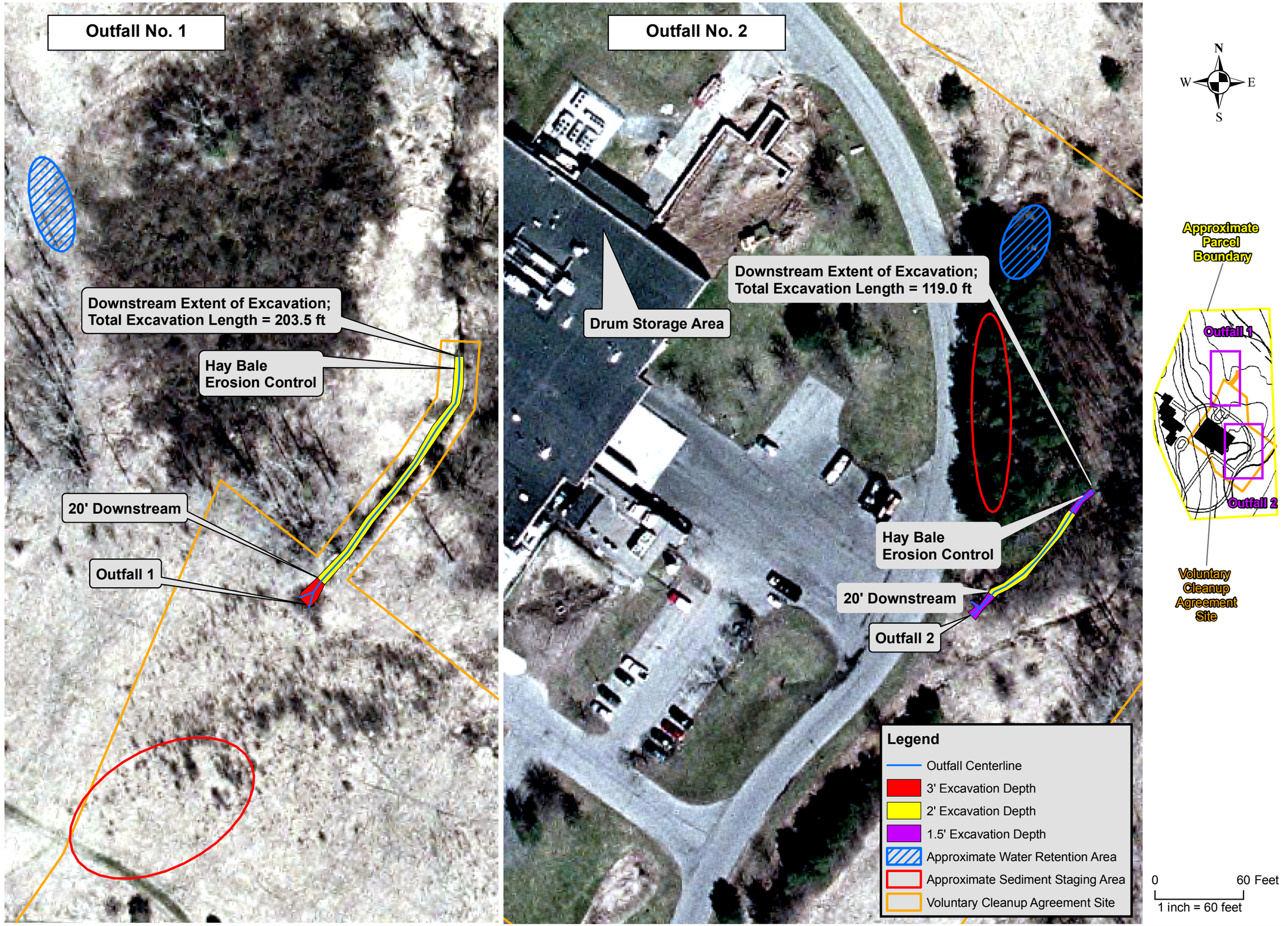
DRAWING TITLE
INSTRUMENT SURVEY

DESIGNED BY: MWH
DRAWN BY: ECH
REVIEWED BY: BWH
DATE: AUG. 2010

PROJECT/DRAWING NUMBER
209025

FIGURE 3

4/7/2011 1:11:13 PM boundary map.dgn



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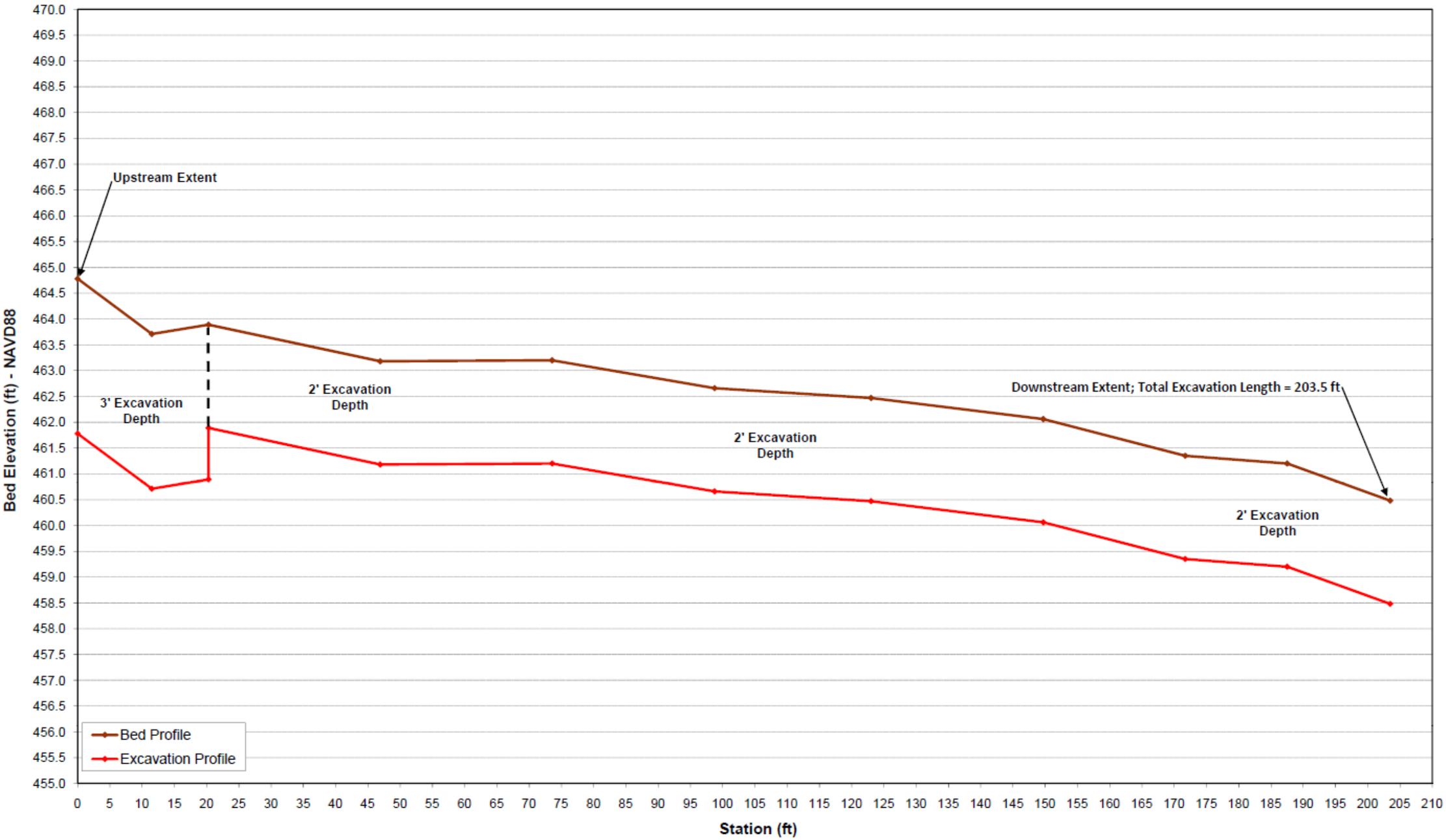
PROJECT/CLIENT
Ultralife Batteries
Site Management Plan
NYSDEC Site No. V00178
1350 Route 88 South
Newark, New York

DRAWING TITLE
Excavation Areas

ISSUED FOR: FINAL
DESIGNED BY: SD
DRAWN BY: IPJ
REVIEWED BY: DPL
DATE: 1/06/2011

PROJECT/DRAWING NUMBER
209025
FIGURE 4



Note: Drawing Not To Scale.

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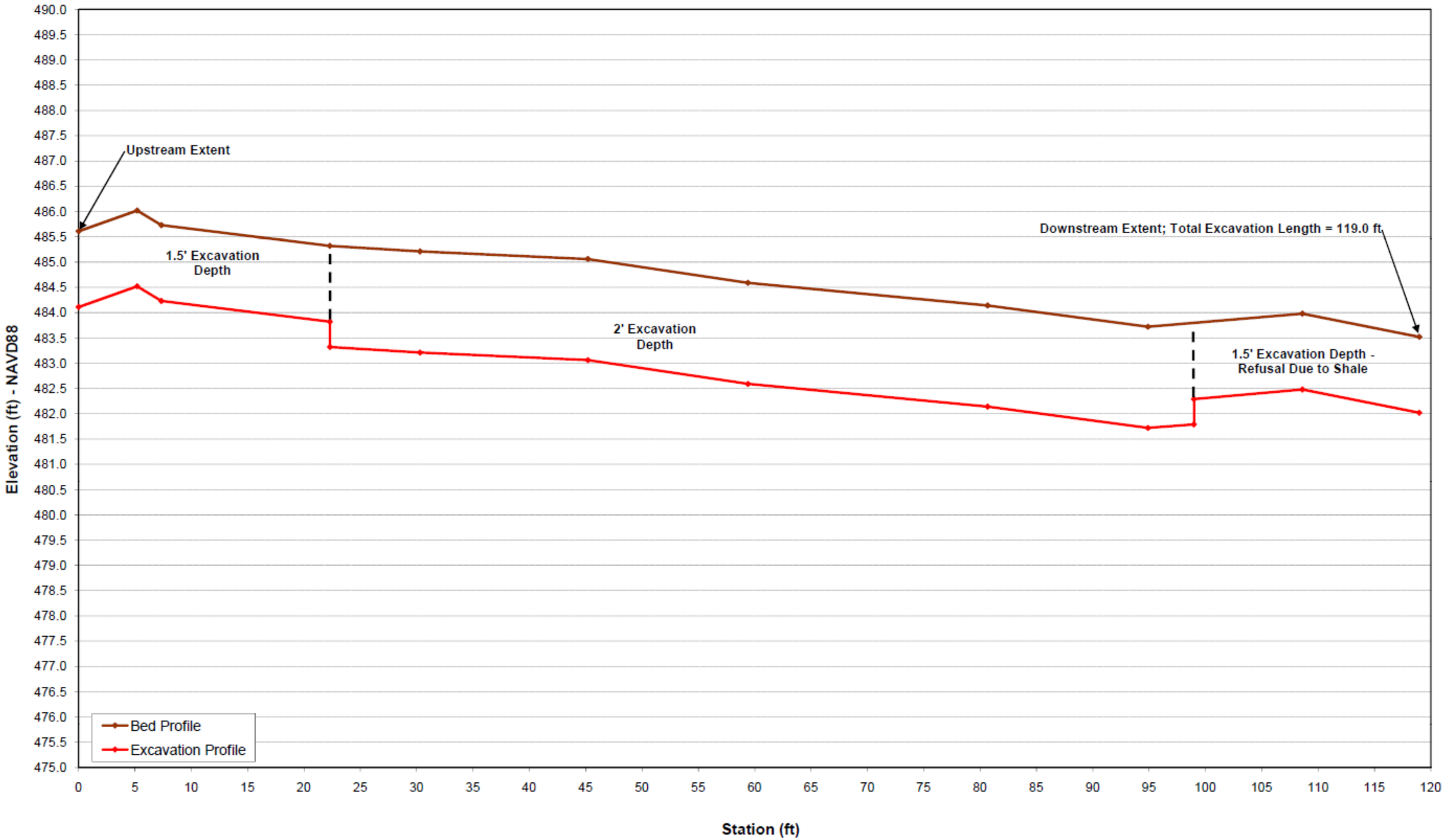
PROJECT/CLIENT
Ultralife Batteries
Site Management Plan
NYSDEC Site No. V00178
1350 Route 88 South
Newark, New York

DRAWING TITLE
OUTFALL #1
EXCAVATION PROFILE

ISSUED FOR: FINAL
DESIGNED BY: SD
DRAWN BY: IPJ
REVIEWED BY: DPN
DATE: 1/06/2011

PROJECT/DRAWING NUMBER
209025
FIGURE 5A

Y:\Ultralife Corporation\209025\Drawings\SMP\Figure 5A - Outfall #1 Excavation Profile (IPJ 2011-01-06).mxd 1/12/2011 @ 10:59:02 AM



Note: Drawing Not To Scale.

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F: (585)454-3066
www.labellapc.com

PROJECT/CLIENT
Ultralife Batteries
Site Management Plan
NYSDEC Site No. V00178
1350 Route 88 South
Newark, New York

DRAWING TITLE
OUTFALL #2
EXCAVATION PROFILE

DESIGNED BY: SD
DRAWN BY: IPJ
REVIEWED BY: DPN
ISSUED FOR: FINAL
DATE: 1/06/2011

PROJECT/DRAWING NUMBER
209025
FIGURE 5B

LABELLA Associates, P.C.
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PROJECT/CLIENT
Ultralife Batteries
Site Management Plan
NYSDEC Site No. V00178
1350 Route 88 South
Newark, New York

DRAWING TITLE
Truck Transport Route

ISSUED FOR: FINAL
DESIGNED BY: IPJ
DRAWN BY: IPJ
REVIEWED BY: DPN
DATE: 01/11/2011

PROJECT/DRAWING NUMBER
209025
FIGURE 6

Y:\Ultralife Corporation\209025\Drawings\SMP\Figure 6 (SMP) Truck Transport Route (IPJ 2011-01-11).mxd 1/11/2011 @ 4:38:52 PM

FIGURE 7 - MAP AND DIRECTIONS TO THE MEDICAL FACILITY
NEWARK-WAYNE COMMUNITY HOSPITAL

Total Time: 8 minutes
Total Distance: 2.9 miles

Start: 2000 Technology Parkway, Newark, NY

START	1. Start out going **SOUTH** on **Technology Parkway**.	~500 ft.
	2. At the traffic circle, take the **2nd** exit and stay on **Technology Pkwy**.	0.2 mi
	3. Turn **right** at **S Main St/NY-88.**	2.3 mi
	4. Turn **left** at **Stuerwald Ave**	0.2 mi
	5. Turn **right** at **Driving Park Ave**	0.2 mi
END	6. End at 1200 Driving Park Ave, Newark, NY	
	Total Mileage/Time	~2.9 mi / 8 min

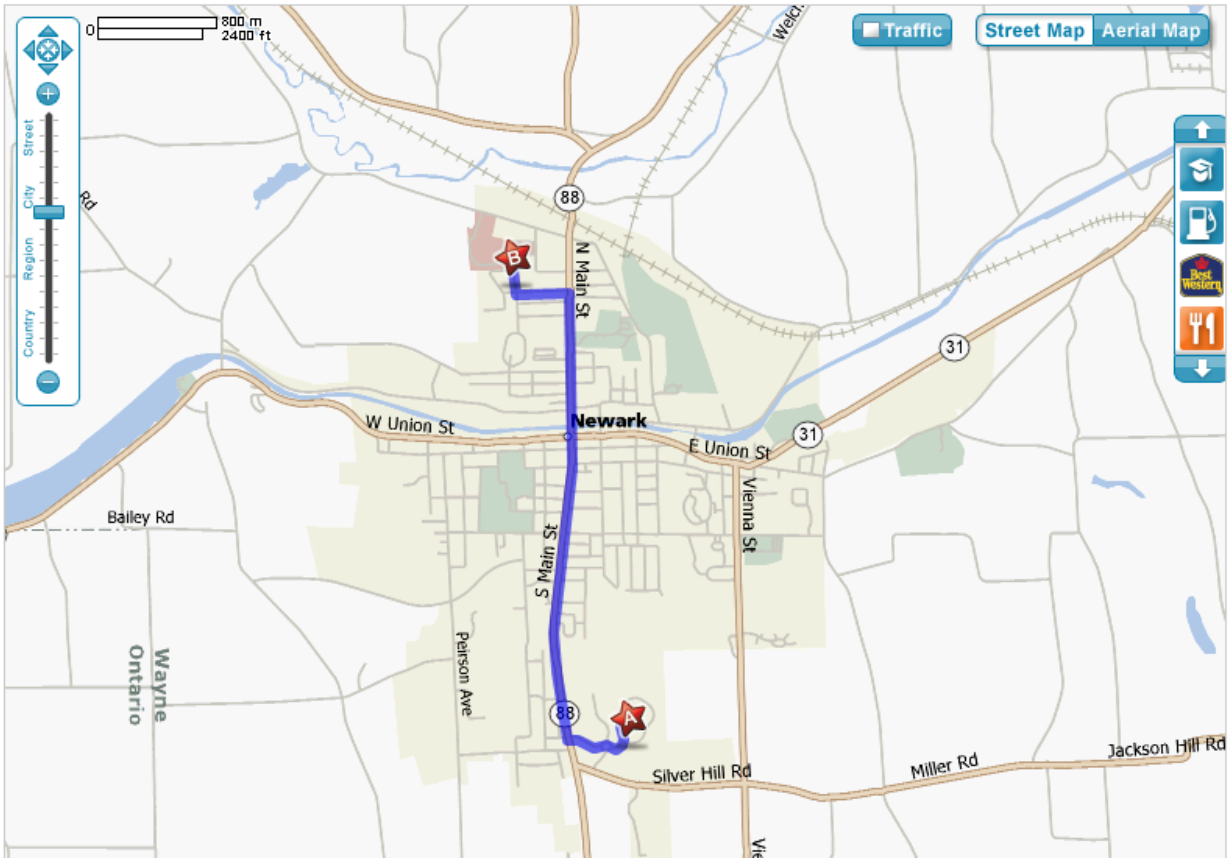

Figure 7
Site Management Plan
Stuart Park Complex – Ultralife Battery
2000 Technology Parkway, Newark, New York
LaBella Project No. 209025

LABELLA
LaBella Associates, P.C.
300 State Street
Rochester, New York 14614

Appendix 1

Groundwater Monitoring Well Network
and
Historic Groundwater Flow Contour

GROUNDWATER CONTOUR MAP

ULTRALIFE BATTERIES, INC.

NEWARK, NEW YORK

OBSERVATION DATES:

MAY 3, 2007

NOV. 2, 2005

SCALE: 1"=60'

DATE: 9-8-2008

FIG. 13

GeoQuest

PARRONE engineering

THE PIANO WORKS
349 WEST COMMERCIAL STREET
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LABELLA
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Appendix 2

Pertinent Documents from the Final Investigation Report

Test Pit Soil Analysis Summary – Table 2
Metals, Total Cyanide, and Total Organic Carbon

Ultralife Batteries, Inc.
Newark, New York

Metals	TP-01 (3.0-3.5 ft.)	TP-02 (5.5-6.0 ft.)	TP-04 (6.5-7.0 ft.)	TP-05 (4.0-4.5 ft.)	TP-05 (5.5-6.0 ft.)	TP-09 (1.5-2.0 ft.)	TP-11 (0.5-1.0 ft.)	TP-12 (3.0-3.5 ft.)	TP-14 (1.0-1.5 ft.)	TP-15 (1.5-2.0 ft.)	Recommended Soil Cleanup Objectives
Aluminum	5,080	3,620	5,170	6,920	6,040	4,640	9,310	5,750	4,180	3,300	SB
Antimony	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	SB
Arsenic	4.10	**10.6**	3.50	**9.40**	**17.9**	3.80	**12.2**	**44.7**	3.40	**14.4**	7.5 or SB
Barium	26.0	31.5	30.4	51.4	41.7	26.2	70.3	32.0	23.0	16.6	300 or SB
Beryllium	ND	ND	ND	0.0800	ND	ND	**0.190**	ND	ND	0.0800	0.16 or SB
Cadmium	ND	ND	ND	0.110	ND	ND	ND	ND	ND	ND	1 or SB
Calcium	39,200	45,900	55,200	6,620	2,090	3,380	6,840	3,860	1,840	6,430	SB
Chromium	7.40	5.20	7.60	8.80	8.50	7.60	**12.1**	7.60	8.50	4.70	10 or SB
Cobalt	3.80	3.30	3.90	4.30	3.50	3.90	5.10	4.00	2.70	2.70	30 or SB
Copper	12.7	17.0	14.3	8.60	7.10	6.50	11.8	6.20	3.00	4.20	25 or SB
Iron	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	2,000 or SB
Lead	7.20	14.5	6.90	32.8	5.80	4.70	18.5	180	9.40	38.8	SB
Magnesium	**13,800**	**14,300**	**23,400**	4,050	1,550	2,050	2,860	2,500	1,560	3,140	SB **
Manganese	343	657	331	453	341	106	736	409	73.0	232	SB
Mercury	ND	0.0100	ND	0.0200	0.0200	ND	0.0900	0.0200	0.0200	ND	0.1
Nickel	7.80	7.70	8.10	6.90	5.30	7.60	8.90	6.60	5.30	4.50	13 or SB
Potassium	1,150	635	1,130	738	678	744	916	668	739	428	SB
Selenium	1.50	1.80	1.30	1.90	1.50	ND	2.00	ND	ND	1.00	2 or SB
Silver	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	SB
Sodium	144	81.0	170	67.3	44.2	174	101	64.5	73.6	40.4	SB
Thallium	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	SB
Vanadium	13.5	9.10	13.4	15.1	26.3	13.3	22.3	13.1	14.3	9.00	150 or SB
Zinc	**36.1**	**53.4**	**39.9**	**45.0**	**70.0**	**37.4**	**72.8**	**35.6**	**52.9**	**21.7**	20 or SB
Total Cyanide	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA
Total Organic Carbon	ND	1,760	2,040	6,040	2,410	839	19,600	5,880	2,420	1,480	NA

Notes:

1. NA = Not Applicable, ND = Less than laboratory detection limits, B = detected in blank, SB = Site Background, concentrations shown in shaded background indicate detection above laboratory limits, and concentrations shown in bold type and shaded indicate values above New York State Department of Environmental Conservation (NYSDEC) TAGM 4046 Recommended Soil Cleanup Objectives.
2. Concentrations are expressed in parts per million (ppm) equivalent to mg/kg or mg/L.
3. ** Eastern US Background for Magnesium is 100-5,000 ppm.
4. Samples collected by GeoQuest Environmental, Inc. on November 2, 2005 and analyzed by Columbia Analytical Services, Rochester, New York (Lab ID # 10145).

Test Pit Soil Analytical Summary – Table 2 (Page 1 of 2)
Semi-Volatile Organic Compounds – Method OLM 4.2

Ultralife Batteries, Inc.
Newark, New York

Chemical Compound	TP-01 (3.0-3.5 ft.)	TP-02 (5.5-6.0 ft.)	TP-04 (6.5-7.0 ft.)	TP-05 (4.0-4.5 ft.)	TP-05 (5.5-6.0 ft.)	TP-09 (1.5-2.0 ft.)	TP-11 (0.5-1.0 ft.)	TP-12 (3.0-3.5 ft.)	TP-14 (1.0-1.5 ft.)	TP-15 (1.5-2.0 ft.)	Recommended Soil Cleanup Objectives
Acenaphthene	ND	ND	ND	ND	ND	ND	0.120 J	ND	ND	ND	50
Acenaphthylene	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	41
Acetophenone	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	-
Anthracene	ND	ND	ND	ND	ND	ND	0.240	ND	0.040 J	ND	50
Atrazine	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	-
Benzaldehyde	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	-
Benzo (a) Anthracene	ND	ND	ND	ND	0.045 J	ND	**0.500**	ND	ND	ND	0.224
Benzo (a) Pyrene	ND	ND	ND	ND	0.047 J	ND	**0.520**	ND	ND	ND	0.061
Benzo (b) Fluoranthene	ND	ND	ND	ND	ND	ND	0.400 J	ND	ND	ND	1.1
Benzo (g,h,i) Perylene	ND	ND	ND	ND	ND	ND	0.340 J	ND	ND	ND	50
Benzo (k) Fluoranthene	ND	ND	ND	ND	0.048 J	ND	0.400 J	ND	ND	ND	1.1
1,1'- Biphenyl	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	-
Butyl Benzyl Phthalate	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	50
Di-N-Butylphthalate	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	8.1
Caprolactam	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	-
Carbazole	ND	ND	ND	ND	ND	ND	0.110 J	ND	ND	ND	-
Indeno (1,2,3-cd) Pyrene	ND	ND	ND	ND	ND	ND	0.290 J	ND	ND	ND	3.2
4-Chloroaniline	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.220
Bis (-2-Chloroethoxy) Methane	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	-
Bis (-2-Chloroethyl) Ether	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	-
2-Chloronaphthalene	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	-
2-Chlorophenol	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.8
2,2'- Oxybis (1-Chloropropane)	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	-
Chrysene	ND	ND	ND	ND	0.055	ND	**0.530**	ND	ND	ND	0.4
Dibenz (a,h) Anthracene	ND	ND	ND	ND	ND	ND	**0.086 J**	ND	ND	ND	0.014
Dibenzofuran	ND	ND	ND	ND	ND	ND	0.110	ND	ND	ND	6.2
3,3'- Dichlorobenzidine	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA
2,4- Dichlorophenol	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.4
Diethylphthalate	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	7.1
Dimethyl Phthalate	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	2.0
2,4- Dimethylphenol	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	-
2,4- Dinitrophenol	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.200
2,4- Dinitrotoluene	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	1.0
2,6- Dinitrotoluene	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	1.0
Bis (2-Ethylhexyl) Phthalate	ND	ND	ND	0.051J	ND	ND	ND	ND	0.055 J	0.055 J	50
Fluoranthene	ND	ND	ND	ND	0.130 J	ND	1.500	ND	ND	ND	50
Fluorene	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	50

Test Pit Soil Analytical Summary – Table 2 (Page 2 of 2)
Semi-Volatile Organic Compounds – Method OLM 4.2

Ultralife Batteries, Inc.

Newark, New York

Chemical Compound	TP-01 (3.0-3.5 ft.)	TP-02 (5.5-6.0 ft.)	TP-04 (6.5-7.0 ft.)	TP-05 (4.0-4.5 ft.)	TP-05 (5.5-6.0 ft.)	TP-09 (1.5-2.0 ft.)	TP-11 (0.5-1.0 ft.)	TP-12 (3.0-3.5 ft.)	TP-14 (1.0-1.5 ft.)	TP-15 (1.5-2.0 ft.)	RSCO (ppm)
Hexachlorobenzene	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.41
Hexachlorobutadiene	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	-
Hexachlorocyclopentadiene	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	-
Hexachloroethane	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	4.40
Isophorone	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	36.4
2- Methylnaphthalene	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	-
4,6- Dinitro-2- Methylphenol	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	-
4- Chloro-3- Methylphenol	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.100
2- Methylphenol	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.9
4- Methylphenol	ND	ND	ND	ND	ND	ND	0.079 J	ND	ND	ND	13
Naphthalene	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.430
2- Nitroaniline	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.500
3- Nitroaniline	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	-
4- Nitroaniline	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.200
Nitrobenzene	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.330
2- Nitrophenol	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.100
4- Nitrophenol	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	-
N- Nitrosodiphenylamine	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	-
Di-n-octyl Phthalate	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	1.0
Pentachlorophenol	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	50
Phenanthrene	ND	ND	ND	ND	0.092 J	ND	1.500	ND	0.140 J	ND	0.03
Phenol	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	-
4- Bromophenyl- Phenylether	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	-
4- Chlorophenyl- Phenylether	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	-
N- nitroso-di-n- Propylamine	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	50
Pyrene	ND	ND	ND	ND	0.110 J	ND	1.100	ND	ND	ND	-
2,4,6- Trichlorophenol	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.1
2,4,5- Trichlorophenol	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA
Total Semi-Volatile Organic Compounds	**ND**	**ND**	**ND**	**0.051J**	**0.527**	**ND**	**7.825**	**ND**	**0.235**	**0.055**	

Notes:

1. NA = Not Applicable, ND = Less than laboratory detection limits, J = estimated value, concentrations shown in shaded background indicate detection above laboratory limits, and concentrations shown in bold type and shaded indicate values above New York State Department of Environmental Conservation (NYSDEC) TAGM 4046 Recommended Soil Cleanup Objectives (RSCO).
2. - = No standard available.
3. Concentrations are expressed in parts per million (ppm) equivalent to mg/kg.
4. Samples collected by GeoQuest Environmental, Inc. on November 2, 2005 and analyzed by Columbia Analytical Services, Rochester, New York (Lab ID # 10145).

Test Pit Soil Analytical Summary – Table 2 (Page 1 of 2)
Volatile Organic Compounds – Method OLM

Ultralife Batteries, Inc.
Newark, New York

Chemical Compound	TP-01 (3.0-3.5 ft.)	TP-02 (5.5-6.0 ft.)	TP-04 (6.5-7.0 ft.)	TP-05 (4.0-4.5 ft.)	TP-05 D (4.0-4.5 ft.)	TP-05 (5.5-6.0 ft.)	TP-09 (1.5-2.0 ft.)	TP-11 (0.5-1.0 ft.)	TP-12 (3.0-3.5 ft.)	TP-14 (1.0-1.5 ft.)	TP-15 (1.5-2.0 ft.)	Recommended Soil Cleanup Objectives
Acetone	ND	ND	0.011 J	0.450 E	0.460 D	0.081	ND	ND	ND	0.0042 J	ND	0.2
Benzene	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.06
Bromodichloromethane	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	-
Bromoform	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	-
Bromomethane	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	-
2- Butanone (MEK)	ND	ND	ND	0.110	0.120	0.010	ND	ND	ND	ND	ND	0.3
Methyl Tert- Butyl Ether	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	-
Carbon Disulfide	ND	ND	ND	0.00095 J	ND	ND	ND	ND	ND	ND	ND	2.7
Carbon Tetrachloride	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.6
Chlorobenzene	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	1.7
Chloroethane	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	1.9
Chloroform	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.3
Chloromethane	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	-
1,2- Dibromo-3- Chloropropane	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	-
Cyclohexane	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	-
Dibromochloromethane	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA
1,2- Dibromoethane	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	-
1,2- Dichlorobenzene	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	7.9
1,4- Dichlorobenzene	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	8.5
1,3- Dichlorobenzene	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	1.6
Dichlorodifluoromethane	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	-
1,1- Dichloroethane	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.4
1,2- Dichloroethane	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	-
1,1- Dichloroethene	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	-
Trans-1,2- Dichloroethene	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.3
Cis-1,2-Dichloroethene	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	-
1,2- Dichloropropane	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	-
Trans-1,3- Dichloropropene	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	-
Cis-1,3- Dichloropropene	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	-
Ethylbenzene	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	5.5
2- Hexanone	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	-
Isopropylbenzene	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	-
Methyl Acetate	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	-
Methylcyclohexane	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	-
Methylene Chloride	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.1
4- Methyl-2- Pentanone	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	1.0

Test Pit Soil Analytical Summary – Table 2 (Page 2 of 2)
Volatile Organic Compounds – Method OLM
Ultralife Batteries, Inc.
Newark, New York

Chemical Compound	TP-01 (3.0-3.5 ft.)	TP-02 (5.5-6.0 ft.)	TP-04 (6.5-7.0 ft.)	TP-05 (4.0-4.5 ft.)	TP-05D (4.0-4.5 ft.)	TP-05 (5.5-6.0 ft.)	TP-09 (1.5-2.0 ft.)	TP-11 (0.5-1.0 ft.)	TP-12 (3.0-3.5 ft.)	TP-14 (1.0-1.5 ft.)	TP-15 (1.5-2.0 ft.)	Recommended Soil Cleanup Objectives
Styrene	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	-
1,1,2,2- Tetrachloroethane	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	-
Tetrachloroethene	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	1.4
Toluene	ND	ND	ND	ND	0.0068 J	ND	0.0030 J	0.0034 J	ND	ND	ND	1.5
1,2,4- Trichlorobenzene	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	3.4
1,1,1- Trichloroethane	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	1.4
1,1,2- Trichloroethane	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	-
Trichloroethene	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.7
Trichlorofluoromethane	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	-
1,1,2-Trichloro-1,2,2- Trifluoroeth	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	-
Vinyl Chloride	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.2
M+P- Xylene	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	1.2
O- Xylene	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	1.2
Total Volatile Organic Compounds	**ND**	**ND**	**0.011**	**0.56095**	**0.5868**	**0.091**	**0.0030**	**0.0034**	**ND**	**0.0042**	**ND**	NA

Notes:

1. NA = Not Applicable, ND = Less than laboratory detection limits, J = estimated value, E = concentrations exceeded calibration range, D = secondary dilution, concentrations shown in shaded background indicate detection above laboratory limits, and concentrations shown in bold type and shaded indicate values above New York State Department of Environmental Conservation (NYSDEC) TAGM 4046 Recommended Soil Cleanup Objectives.
2. - = No standards available.
3. Concentrations are expressed in parts per million (ppm) equivalent to Mg/kg.
4. Samples collected by GeoQuest Environmental, Inc. on November 2, 2005 and analyzed by Columbia Analytical Services, Rochester, New York (Lab ID # 10145).

Soil Analytical Summary – Table 2
Pesticides/ PCBs – Method OLM 4.2

Ultralife Batteries, Inc.
Newark, New York

Chemical Compound	TP-01 (3.0-3.5 ft.)	TP-02 (5.5-6.0 ft.)	TP-04 (6.5-7.0 ft.)	TP-05 (4.0-4.5 ft.)	TP-05 (5.5-6.0 ft.)	TP-09 (1.5-2.0 ft.)	TP-11 (0.5-1.0 ft.)	TP-12 (3.0-3.5 ft.)	TP-14 (1.0-1.5 ft.)	TP-15 (1.5-2.0 ft.)	Recommended Soil Cleanup Objectives
Aroclor-1016	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	1.0
Aroclor-1221	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	1.0
Aroclor-1232	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	1.0
Aroclor-1242	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	1.0
Aroclor-1248	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	1.0
Aroclor-1254	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	1.0
Aroclor-1260	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	1.0
Aldrin	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.041
Alpha-BHC	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.11
Beta-BHC	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.2
Delta-BHC	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.3
Gamma-BHC (Lindane)	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.06
Alpha-Chlordane	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.54
Gamma-Chlordane	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.54
4,4'-DDD	ND	ND	0.0045	ND	ND	ND	ND	ND	0.0076	0.0067	2.9
4,4'-DDE	0.012	ND	0.0086	0.0066	ND	ND	0.013	ND	ND	ND	2.1
4,4'-DDT	0.0073	ND	ND	ND	ND	ND	0.009	ND	ND	ND	2.1
Dieldrin	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.044
Endosulfan I	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.9
Endosulfan II	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.9
Endosulfan Sulfate	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	1.0
Endrin	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.10
Endrin Aldehyde	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	-
Endrin Ketone	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA
Heptachlor	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.10
Heptachlor Epoxide	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.02
Methoxychlor	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	-
Toxaphene	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	-
Total Pesticide/PCBs	**0.0193**	**ND**	**0.0131**	**0.0066**	**ND**	**ND**	**0.022**	**ND**	**0.0076**	**0.0067**	NA

Notes:

1. NA = Not Applicable, ND = Less than laboratory detection limits, concentrations shown in shaded background indicate detection above laboratory limits, and concentrations shown in bold type and shaded indicate values above New York State Department of Environmental Conservation (NYSDEC) TAGM 4046 Recommended Soil Cleanup Objectives.
2. - = No standard available.
3. Concentrations are expressed in parts per million (ppm) equivalent to mg/kg or mg/L.
4. Samples collected by GeoQuest Environmental, Inc. on November 2, 2005 and analyzed by Columbia Analytical Services, Rochester, New York (Lab ID # 10145).

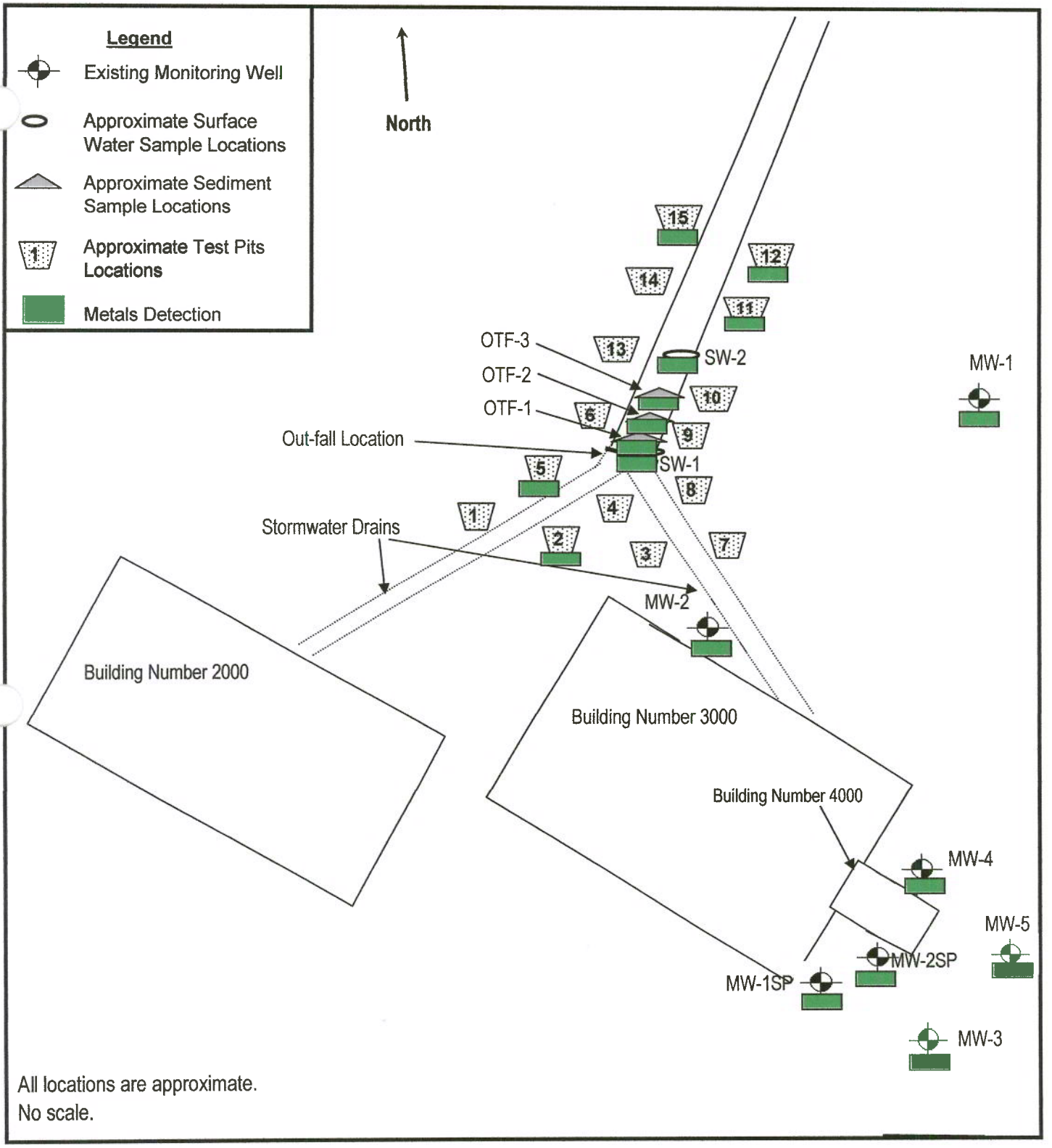
Test Pit Soil Analysis Summary – Table 2
Metals and Total Organic Carbon – Method ILM 4.2

Ultralife Batteries, Inc.
Newark, New York

	TP-12 (3.0-3.5 ft.) 11/2005	TP-16 (0.0-0.5 ft.) 5/2007	TP-17 (3.5-4.0 ft.) 5/2007	TP-19 (0.5-1.0 ft.) 5/2007	TP-22 (0.0-0.5 ft.) 5/2007	TP-22 (3.0-3.5 ft.) 5/2007	Recommended Soil Cleanup Objectives (ppm)
Arsenic	**44.7**	**6.4**	1.3	**6.7**	**8.3**	1.4	7.5 or SB
Total Organic Carbon	5,880	16,500	804	8,240	18,100	1,260	NA

Notes:

1. NA = Not Applicable, ND = Less than laboratory detection limits, Concentrations shown in bold type and shaded indicate values above New York State Department of Environmental Conservation (NYSDEC) TAGM 4046 Recommended Soil Cleanup Objectives. Concentrations shaded are above the laboratory detection limits.
2. Concentrations are expressed in parts per million (ppm) equivalent to mg/kg .
3. Sample collected from test pit TP-12 by GeoQuest Environmental, Inc. on November 2, 2005 and analyzed by Columbia Analytical Services, Rochester, New York (Lab ID # 10145).
4. Samples collected from test pits TP-16, TP-17, TP-19, and TP-22 by GeoQuest Environmental, Inc. on May 10, 2007 and analyzed by Columbia Analytical Services.



GeoQuest Environmental, Inc.
1134 Titus Avenue
Rochester, NY 14617-2411
Phone: (585) 467-1696
Fax: (585) 266-4269
www.geoquestenvironmental.com

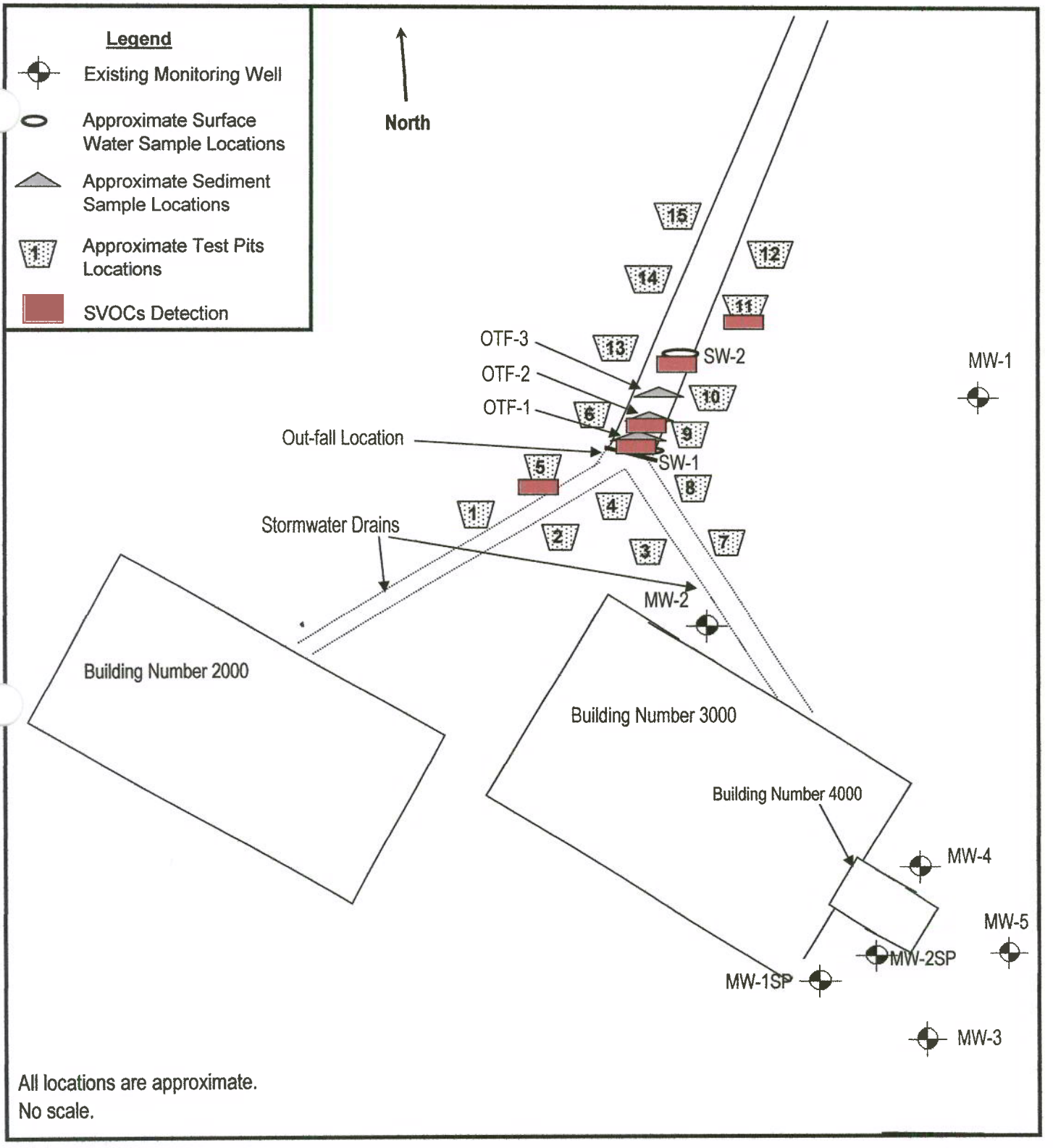
Drawn By:	YEP-GeoQuest Environmental, Inc.
Checked By:	SJD-GeoQuest Environmental, Inc.
Status:	Final
Date:	3/20/2005

PROJECT TITLE: Ultralife Batteries, Inc. Newark, New York

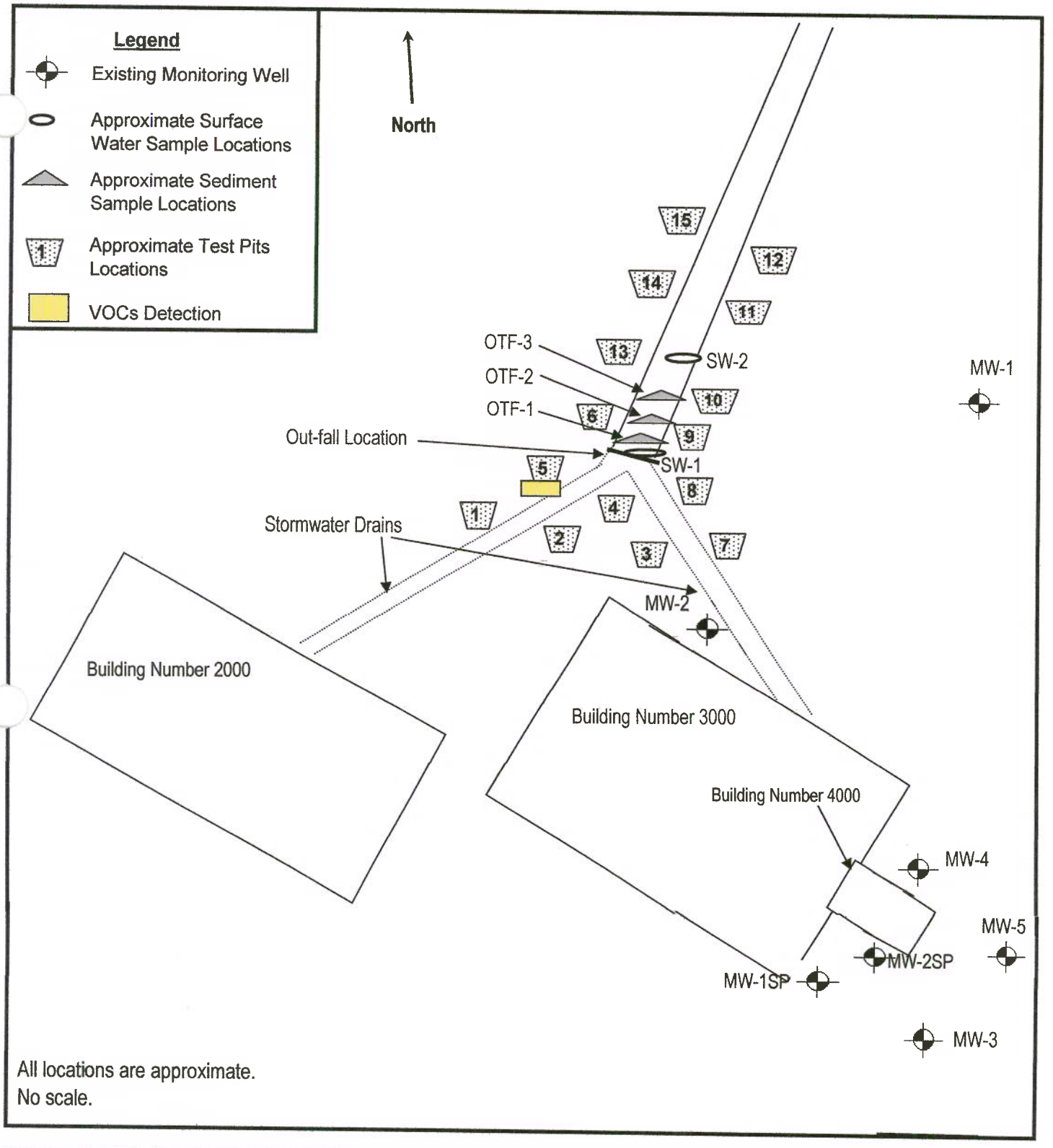
PROJECT NUMBER: GeoQuest Job No. 51605

DRAWING: Figure 3

DRAWING TITLE: Metals Distribution



GeoQuest Environmental, Inc. 1134 Titus Avenue Rochester, NY 14617-2411 Phone: (585) 467-1696 Fax: (585) 266-4269 www.geoquestenvironmental.com	Drawn By: YEP-GeoQuest Environmental, Inc. Checked By: SJD-GeoQuest Environmental, Inc. Status: Final Date: 3/20/2005	**PROJECT TITLE:** Ultralife Batteries, Inc. Newark, New York
	PROJECT NUMBER: GeoQuest Job No. 51605	**DRAWING:** Figure 4
		DRAWING TITLE: Semi-Volatile Organics Distribution



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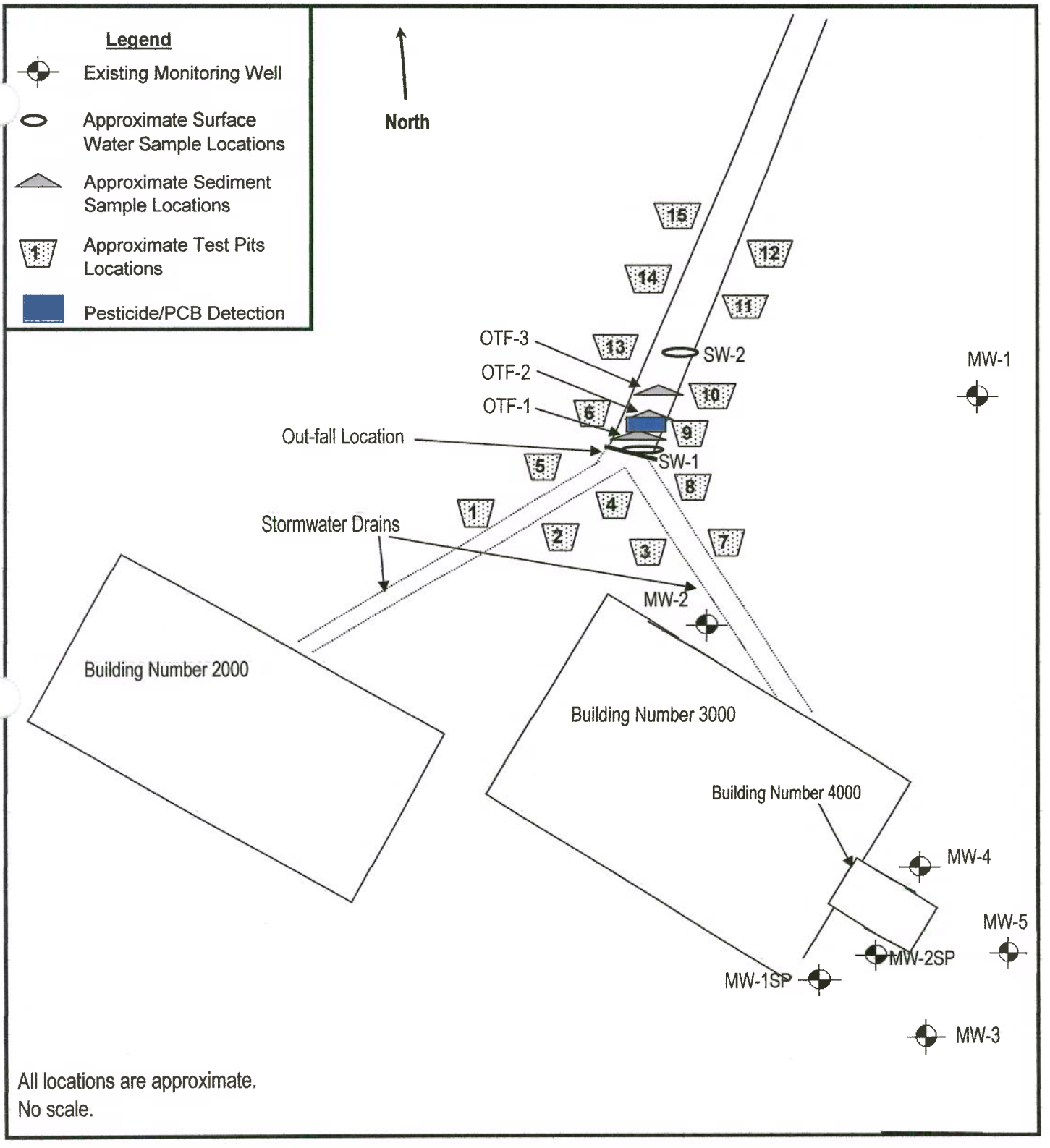
Checked By: SJD-GeoQuest Environmental, Inc.
Status: Final
Date: 3/20/2005

PROJECT TITLE:
Ultralife Batteries, Inc.
Newark, New York

PROJECT NUMBER:
GeoQuest Job No. 51605

DRAWING:
Figure 5

DRAWING TITLE:
Volatile Organics Distribution



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Drawn By:	YEP-GeoQuest Environmental, Inc.
Checked By:	SJD-GeoQuest Environmental, Inc.
Status:	Final
Date:	3/20/2005

PROJECT TITLE: Ultralife Batteries, Inc. Newark, New York

PROJECT NUMBER: GeoQuest Job No. 51605

DRAWING: Figure 6

DRAWING TITLE: Pesticide/PCBs Distribution

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300 State Street
Rochester, New York 14614

Appendix 3
Excavation Work Plan

APPENDIX 3 – EXCAVATION WORK PLAN

A-1 NOTIFICATION

At least 15 days prior to the start of any activity that is anticipated to extend beyond a depth of 2-feet below the ground surface, the site owner or their representative will notify the Department. Currently, this notification will be made to:

Ms. Charlotte Theobald
Division of Environmental Remediation
NYSDEC, Region 8 Office
6274 East Avon-Lima Road
Avon, New York 14414
cbtheoba@gw.dec.state.ny.us

This notification will include:

- A detailed description of the work to be performed, including the location and areal extent, plans for replacing 2-ft. of clean material over disturbed areas, estimated volumes of soil to be excavated below 2-ft. and where this material will be relocated on-site or disposed of off-site (i.e., permitted disposal facility);
- A summary of environmental conditions anticipated in the work areas, including any known laboratory data for the soils in the area of work, potential presence of grossly contaminated media, and plans for any pre-construction sampling;
- A schedule for the work (start and completion of 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 29 CFR 1910.120;
- A copy of the contractor's health and safety plan, in electronic format, if it differs from the HASP provided in Appendix 6 of this document;
- Identification of disposal facilities for potential waste streams; and

- Identification of sources of any anticipated backfill, along with all required chemical testing results.

A-2 SOIL SCREENING METHODS

Visual, olfactory, and instrument-based soil screening will be performed by a qualified environmental professional during all remedial and development excavations below the 2-foot depth into known or potentially contaminated material (remaining contamination). Soil screening will be performed regardless of when the invasive work is done and will include all excavation and invasive work performed during development, such as excavations for foundations and utility work, after issuance of the Limited Liability Release.

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.

A-3 STOCKPILE METHODS

Soil stockpiles will be continuously encircled with a berm and/or silt fence. Hay bales will be used as needed near catch basins, surface waters and other discharge points.

Stockpiles will be kept covered at all times with appropriately anchored tarps. Stockpiles will be routinely inspected and damaged tarp covers will be promptly replaced.

Stockpiles will be inspected at a minimum once each week and after every storm event. Results of inspections will be recorded in a logbook and maintained at the site and available for inspection by NYSDEC.

A-4 MATERIALS EXCAVATION AND LOAD OUT

A qualified environmental professional or person under their supervision will oversee all invasive work beyond 2-ft. in depth and the excavation and load-out of all excavated material.

The owner of the property and its contractors are solely responsible for safe execution of all invasive and other work performed under this Plan.

The presence of utilities and easements on the site will be investigated by the qualified environmental professional. It will be determined whether a risk or impediment to the planned work under this SMP is posed by utilities or easements on the site.

Loaded vehicles leaving (if any) the site will be appropriately lined, tarped, securely covered, manifested, and placarded in accordance with appropriate Federal, State, local, and NYSDOT requirements (and all other applicable transportation requirements).

All outbound trucks will be deconned (washed, brushed off) before leaving the site until the activities performed under this section are complete. The qualified environmental professional will be responsible for ensuring that all outbound trucks are decontaminated (washed, brushed off) before leaving the site.

The qualified environmental professional will also be responsible for ensuring that all locations where vehicles enter or exit the site shall be inspected daily for evidence of off-site soil tracking. Cleaning of the adjacent streets will be performed as needed to maintain a clean condition with respect to site-derived materials.

A-5 MATERIALS TRANSPORT OFF-SITE

All transport of materials will be performed by licensed haulers in accordance with appropriate local, State, and Federal regulations, including 6 NYCRR Part 364. 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.

All trucks will be decontaminated prior to leaving the site. Truck decontamination material will be collected and disposed of off-site in an appropriate manner in accordance with all applicable local, State, and Federal regulations.

All trucks loaded with site material will exit the vicinity of the site using only these approved truck routes. This is the most appropriate route and takes 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; (g) community input [where necessary].

Trucks will be prohibited from stopping and idling in the neighborhood outside the project site.

Egress points for truck and equipment transport from the site will be kept clean of dirt and other materials during site remediation and development.

Queuing of trucks will be performed on-site in order to minimize off-site disturbance. Off-site queuing will be prohibited.

A-6 MATERIALS DISPOSAL OFF-SITE

All soil/fill/solid waste excavated and removed from the site will be treated as contaminated and regulated material and will be transported and disposed in accordance with all local, State (including 6NYCRR 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, e.g., hazardous waste disposal facility, solid waste landfill, petroleum treatment facility, C/D recycling facility. Actual disposal quantities and associated documentation will be provided to NYSDEC in the Periodic Review Reports. This documentation will include: waste profiles, test results, facility acceptance letters, manifests, bills of lading, and facility receipts.

Non-hazardous historic fill and contaminated soils taken off-site will be handled, at minimum, as a Municipal Solid Waste per 6NYCRR 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 (6NYCRR Part 360-16 Registration Facility).

A-7 MATERIALS REUSE ON-SITE

A-7.1 SOIL COVER SYSTEM: 0-2 FEET

The soil/fill material that consists of the soil cover (0-2 feet) will be stockpiled and staged separately from the soil/fill material located below the soil cover (greater than 2 feet deep). Soil cover material excavated can be reused as soil cover material as long as there is no evidence of staining, grossly contaminated material, PID readings (greater than 10 ppm above background), or odors. If the cover system soil/fill material has evidence of staining, grossly contaminated material, elevated PID readings or odors then the soil/fill material must be either sampled to determine if it can be placed below the 2 foot soil cover system or it must be containerized and characterized for off-site disposal.

A-7.2 SOIL BELOW THE COVER SYSTEM

Contaminated on-site material, including historic fill and contaminated soil, that is acceptable for re-use on-site will be placed 2.0-feet below the soil cover or impervious surface and will not be reused within the cover soil layer (i.e., within 2-ft. of the surface). Material reused on-site does not require sampling that is placed below the soil cover. If there is evidence that the soil/fill material is impacted (e.g., staining, odors, PID readings, grossly contaminated), sampling will need to be completed to determine if the material

can be placed below the soil cover or off-site disposal is needed. Grossly contaminated soil/fill material cannot be returned to the excavation and must be disposed off-site in accordance with all applicable local, State and Federal regulations.

The segregated soil/fill material will be stockpiled on and covered with a minimum of a double layer of 6 mil polyethene sheeting.

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. Contaminated on-site material, including historic fill and contaminated soil, that is acceptable for re-use on-site will be placed below the soil cover layer or impervious surface, and will not be reused within a cover soil layer, within landscaping berms, or as backfill for subsurface utility lines.

Any demolition material proposed for reuse on-site will be sampled for asbestos and the results will be reported to the NYSDEC for acceptance. The crushing or processing of and the reuse of potentially contaminated concrete on the site will not be performed without prior NYSDEC notification and approval. Organic matter (wood, roots, stumps, etc.) or other solid waste derived from clearing and grubbing of the site will be managed in accordance with all applicable local, State, and Federal regulations.

A-8 FLUIDS MANAGEMENT

All liquids to be removed from the site, including 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. Discharge of water generated during large-scale construction activities to surface waters (i.e., a local pond, stream or river) will be performed under a SPDES permit.

A-9 COVER SYSTEM RESTORATION

After the completion of soil removal and any other invasive activities the cover system will be restored in a manner that complies with the RAWP. If the type of cover system changes from that which exists prior to the excavation (e.g., a soil cover is

replaced by asphalt), this will constitute a modification of the cover element of the remedy. A figure showing the modified surface will be included in the subsequent Periodic Review Report and in any updates to the Site Management Plan.

A-10 BACKFILL FROM OFF-SITE SOURCES

All material proposed for import onto the site will be approved by the qualified environmental professional and will be in compliance with the provisions in this SMP prior to receipt at the Site.

Material from industrial sites, spill sites, or other environmental remediation sites or potentially contaminated sites will not be imported to the site. All imported soils will meet the backfill and cover soil quality standards established in 6NYCRR 375-6.7(d).

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 without prior approval by NYSDEC. Solid waste will not be imported onto the site.

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 wind and precipitation erosion issues.

A-11 STORMWATER POLLUTION PREVENTION

With regard to larger excavations that may be proposed at the Site, procedures for stormwater pollution prevention shall be specified in a project-specific Stormwater Pollution Prevention Plan that conforms to the requirements of NYSDEC Division of Water guidelines and NYS regulations. If not covered in the project-specific Stormwater Pollution Prevention Plan, the following will also apply:

- Barriers and hay bale checks will be installed and inspected once a week and after every storm event. 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 barrier and hay bale check functional.
- All undercutting or erosion of the silt fence to 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 the construction area.

A-12 CONTINGENCY PLAN

If underground tanks or other previously unidentified contaminant sources are found during post-remedial subsurface 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 list of analytes (TAL metals, TCL volatiles and semi-volatiles, 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 site 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 5 of the SMP.

A-13 ODOR CONTROL PLAN

This odor control plan is capable of controlling emissions of nuisance odors off-site [and on-site, if there are residents or tenants on the property]. Specific odor control methods to be used on a routine basis will include limiting the area of open excavations and size of soil stockpiles and covering soil stockpiles. If nuisance odors are identified at the site boundary, or if odor complaints are received, work will be halted and the source of odors will be identified and corrected. Work will not resume until all nuisance odors have been abated. NYSDEC and NYSDOH will be notified of all odor events and of any other complaints about the project. Implementation of all odor controls, including the halt of work, is the responsibility of the property owner's Remediation Engineer, and any measures that are implemented will be discussed in the Periodic Review Report.

All necessary means will be employed to prevent on- and off-site nuisances. At a minimum, these measures will include: (a) limiting the area of open excavations and size of soil stockpiles; (b) shrouding open excavations with tarps and other covers; and (c) using foams to cover exposed odorous soils. If odors develop and cannot be otherwise controlled, additional means to eliminate odor nuisances will include: (d) direct load-out of soils to trucks for off-site disposal; (e) use of chemical odorants in spray or misting systems; and, (f) use of staff to monitor odors in surrounding neighborhoods.

If nuisance odors develop during intrusive work that cannot be corrected, or where the control of nuisance odors cannot otherwise be achieved due to on-site conditions or close proximity to sensitive receptors, odor control will be achieved by sheltering the excavation and handling areas in a temporary containment structure equipped with appropriate air venting/filtering systems.

A-14 COMMUNITY AIR MONITORING AND FUGITIVE DUST AND PARTICULATE MONITORING PLAN

A copy of the Community Air Monitoring Plan (CAMP) and Fugitive Dust and Particulate Monitoring Plan component of the EWP, obtained from Appendix 1A and 1B of NYSDEC DER-10 Technical Guidance for Site Investigation and Remediation, dated May 2010, is included as Appendix 8 of the SMP. The air monitoring station locations will be based on prevailing wind conditions for that day and will be checked throughout the day and adjusted according to the prevailing wind direction. The provisions of the CAMP and the Fugitive Dust and Particulate Monitoring will be followed during all ground-intrusive activities greater than 2-ft. in depth performed at the Site. Exceedances of action levels listed in the CAMP and Fugitive Dust and Particulate Monitoring will be reported to the NYSDEC and NYSDOH Project Managers.

A-15 DUST CONTROL PLAN

Dust will be managed during invasive on-site work and will include, at a minimum, the items listed below:

- Dust suppression will be conducted as needed on roads. Watering trucks will be equipped with a water cannon capable of spraying water directly onto off-road areas including excavations and stockpiles.
- Clearing and grubbing of larger sites will be done in stages to limit the area of exposed, unvegetated soils vulnerable to dust production.
- Gravel will be used on roadways to provide a clean and dust-free road surface.
- On-site roads will be limited in total area to minimize the area required for water truck sprinkling.

A-16 OTHER NUISANCES

A plan for rodent control will be developed and utilized by the contractor prior to and during site clearing and site grubbing, and during all remedial work.

A plan will be developed and utilized by the contractor for all remedial work to ensure compliance with local noise and control ordinances.

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Rochester, New York 14614

Appendix 4

Groundwater Sampling Log

LABELLA Associates, P.C.
300 State Street
Rochester, New York 14614
Telephone: (585) 454-6110
Facsimile: (585) 454-3066

WELL I.D.: _____

Project Name: Ultralife Corporation
Location: 2000 Technology Parkway, Newark, New York
Project No.: 209025
Sampled By: _____
Date: _____
Weather: _____

WELL SAMPLING INFORMATION

Well Diameter: _____
Depth of Well: _____
Measuring Point: Top of PVC
Pump Type: QED Sample Pro Bladder Pump (Low Flow)
Static Water Level: _____
Length of Well Screen: _____
Depth to Top of Pump: _____
Tubing Type: _____

FIELD PARAMETER MEASUREMENT

Time	Pump Rate	Gallons Purged	pH	Temp °C	Conductivity (µS/cm)	Turbidity (NTU)	Dissolved O_2 (mg/L)	Redox (mV)	Alkalinity	Iron (II)	Comments
			+/- 0.1		+/- 3%		+ 10%	+/- 10 mV			

Total _____ Gallons Purged

Purge Time Start: _____ Purge Time End: _____ Final Static Water Level: _____

OBSERVATIONS

Notes:

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Rochester, New York 14614

Appendix 5

Quality Assurance Project Plan

1. Introduction

This Quality Assurance Project Plan (QAPP) contains procedures that provide for collected data to be properly evaluated and document that Quality Control (QC) procedures have been followed in the collection of samples. This QAPP represents the methodology and measurement procedures used in collecting quality field data. This methodology includes the proper use of equipment, documentation of sample collection, and sample handling practices.

Procedures used in LaBella Associates, P.C.'s (LaBella's) QC program are compatible with federal, state, and local regulations, as well as, appropriate professional and technical standards.

This QC program has been organized into the following areas:

- QC Objectives and Checks
- Field Equipment, Handling, and Calibration
- Sampling Techniques
- Sample Handling and Packaging

It should be noted that the Site Management Plan (SMP) may have site-specific details that will differ from the procedures in this QC program. In such cases, the SMP should be followed (subsequent to regulatory approval).

2. Quality Control Objectives

The United States Environmental Protection Agency (USEPA) has identified five general levels of analytical data quality as being potentially applicable to site investigations conducted under CERCLA. These levels are summarized below:

- **Level I -** Field screening. This level is characterized by the use of portable instruments, which can provide real-time data to assist in the optimization of sampling point locations and for health and safety support. Data can be generated regarding the presence or absence of certain contaminants (especially volatiles) at sampling locations.
- **Level II -** Field analysis. This level is characterized by the use of portable analytical instruments, which can be used on site or in mobile laboratories stationed near a site (close-support labs). Depending upon the types of contaminants, sample matrix, and personnel skills, qualitative and quantitative data can be obtained.
- **Level III -** Laboratory analysis using methods other than the Contract Laboratory Program (CLP) Routine Analytical Services (RAS). This level is used primarily in support of engineering studies using standard USEPA-approved procedures. Some procedures may be equivalent to CLP RAS, without the CLP requirements for documentation.
- **Level IV -** CLP Routine Analytical Services. This level is characterized by rigorous QC protocols and documentation and provides qualitative and quantitative analytical data. Some regions have obtained similar support via their own regional laboratories, university laboratories, or other commercial laboratories.
- **Level V -** Non-standard methods. Analyses, which may require method modification and/or

development. CLP Special Analytical Services (SAS) are considered Level V.

Unless stated otherwise, all data will be generated in accordance with Level IV. When CLP methodology is not available, federal and state approved methods will be utilized. Level III will be utilized, as necessary, for non-CLP RAS work which may include ignitability, corrosivity, reactivity, EP toxicity, and other state approved parameters for characterization. Level I will be used throughout the implementation of the SMP for health and safety monitoring activities.

All measurements will be made to provide that analytical results are representative of the media and conditions measured. Unless otherwise specified, all data will be calculated and reported in units consistent with other organizations reporting similar data to allow comparability of data bases among organizations. Data will be reported in µg/L and mg/L for aqueous samples, and µg/kg and mg/kg (dry weight) for soils, or otherwise as applicable.

The characteristics of major importance for the assessment of generated data are accuracy, precision, completeness, representativeness, and comparability. Application of these characteristics to specific projects is addressed later in this document. The characteristics are defined below.

2.1. Accuracy

Accuracy is the degree of agreement of a measurement or average of measurements with an accepted reference or "true" value and is a measure of bias in the system.

2.2. Precision

Precision is the degree of mutual agreement among individual measurements of a given parameter.

2.3. Completeness

Completeness is a measure of the amount of valid data obtained from a measurement system compared to the amount expected to be obtained under correct normal conditions.

2.4. Representativeness

Representativeness expresses the degree to which data accurately and precisely represents a characteristic of a population, parameter variations at a sampling point, a process condition, or an environmental condition

Careful choice and use of appropriate methods in the field will ensure that samples are representative. This is relatively easy with water or air samples since these components are homogeneously dispersed. In soil and sediment, contaminants are unlikely to be evenly distributed, and thus it is important for the sampler and analyst to exercise good judgment when removing a sample.

2.5. Comparability

Comparability expresses the confidence with which one data set can be compared to another. The data sets may be inter- or intra- laboratory.

3. Measurement of Data Quality

3.1. Accuracy

Accuracy of a particular analysis is measured by assessing its performance with "known" samples. These "knowns" take the form of USEPA standard reference materials, or laboratory prepared solutions of target analytes spiked into a pure water or sample matrix. In the case of GC or GC/MS analyses, solutions of surrogate compounds, which can be spiked into every sample and are designed to mimic the behavior of target analytes without interfering with their determination, are used.

In each case the recovery of the analyte is measured as a percentage, correcting for analytes known to be present in the original sample if necessary, as in the case of a matrix spike analysis. For USEPA supplied known solutions, this recovery is compared to the published data that accompany the solution.

For LaBella's prepared solutions, the recovery is compared to USEPA-developed data or LaBella's historical data as available. For surrogate compounds, recoveries are compared to USEPA CLP acceptable recovery tables.

If recoveries do not meet required criteria, then the analytical data for the batch (or, in the case of surrogate compounds, for the individual sample) are considered potentially inaccurate. The analyst or his supervisor must initiate an investigation of the cause of the problem and take corrective action. This can include recalibration of the instrument, reanalysis of the QC sample, reanalysis of the samples in the batch, or flagging the data as suspect if the problems cannot be resolved. For highly contaminated samples, recovery of the matrix spike may depend on sample homogeneity. As a rule, analyses are not corrected for recovery of matrix spike or surrogate compounds.

3.2. Precision

Precision of a particular analysis is measured by assessing its performance with duplicate or replicate samples. Duplicate samples are pairs of samples taken in the field and transported to the laboratory as distinct samples. Their identity as duplicates is sometimes not known to ASC and usually not known to bench analysts, so their usefulness for monitoring analytical precision at bench level is limited. For most purposes, precision is determined by the analysis of replicate pairs (i.e., two samples prepared at the laboratory from one original sample). Often in replicate analysis the sample chosen for replication does not contain target analytes so that quantitation of precision is impossible. For USEPA CLP analyses, replicate pairs of spiked samples, known as matrix spike/matrix spike duplicate samples, are used for precision studies. This has the advantage that two real positive values for a target analyte can be compared.

Precision is calculated in terms of Relative Percent Difference (RPD).

- Where X_1 and X_2 represent the individual values found for the target analyte in the two replicate analyses or in the matrix spike/matrix spike duplicate analyses.
- RPDs must be compared to the method RPD for the analysis. The analyst or his supervisor must investigate the cause of RPDs outside stated acceptance limits. This may include a visual inspection of the sample for non homogeneity, analysis of check samples, etc. Follow-up action may include sample reanalysis or flagging of the data as suspect if problems cannot be resolved.
- During the data review and validation process, field duplicate RPDs are assessed as a measure of the total variability of both field sampling and laboratory analysis.

3.3. Completeness

Completeness for each parameter is calculated as follows:

- LaBella's target value for completeness for all parameters is 100%. A completeness value of 95% will be considered acceptable. Incomplete results will be reported to the site managers. In planning the field sample collection, the site manager will plan to collect field duplicates from identified critical areas. This procedure should assure 100% completeness for these areas.

3.4. Representativeness

The characteristic of representativeness is not quantifiable. Subjective factors to be taken into account are as follows:

- The degree of homogeneity of a site;
- The degree of homogeneity of a sample taken from one point in a site; and
- The available information on which a sampling plan is based.

To maximize representativeness of results, sampling techniques and sample locations will be carefully chosen so that they provide laboratory samples representative of the site and the specific area. Within the laboratory, precautions are taken to extract from the sample bottle an aliquot representative of the whole sample. This includes premixing the sample and discarding pebbles from soil samples.

4. QC Targets

Target values for detection limit, percent spike recovery and percent "true" value of known check standards, and RPD of duplicates/replicates are included in the QAPP, Analytical Procedures. Note that tabulated values are not always attainable. Instances may arise where high sample concentrations, non homogeneity of samples, or matrix interferences preclude achievement of target detection limits or other quality control criteria. In such instances, LaBella will report reasons for deviations from these detection limits or noncompliance with quality control criteria.

5. Groundwater Sampling Procedures

The groundwater sampling plan outlined in this subsection has been prepared in general accordance with RCRA Groundwater Monitoring Technical Enforcement Guidance Document 9950.1 (September 1986), Office of Solid Waste and Emergency Response.

Water levels in all existing monitoring wells will be measured to within 0.01 foot prior to purging and sampling. Purging and sampling of each well will be accomplished as specified in the Site Management Plan (i.e., using low-flow sampling techniques).

In addition to the protocols in the SMP, the following will also be conducted:

- Water clarity will be quantified during sampling with a turbidity meter;
- Any observable physical characteristics of the groundwater (e.g., color, sheen, odor, turbidity) at the time of sampling will be recorded; and
- Weather conditions (i.e., air temperature, sky condition, recent heavy rainfall, drought conditions) at the time of sampling will be recorded.

The volumes specified in Table 1 will be used for the samples to be collected.

6. Management of Sampling-Derived Waste

Purpose:

The purposes of these guidelines are to ensure the proper holding, storage, transportation, and disposal of materials. Sampling-derived waste (SDW) included the following:

- Well development and purge waters and discarded groundwater samples;
- Decontamination waters and associated solids;
- Soiled disposable personal protective equipment (PPE);
- Used disposable sampling equipment;
- Used plastic sheeting and aluminum foil;
- Other equipment or materials that either contain or have been in contact with potentially-impacted environmental media.

Procedure:

1. Personal protective equipment, disposable sampling equipment, and similar equipment may be disposed as municipal waste, unless waste characterization results mandate disposal as industrial wastes.
2. Groundwater purge waters will be containerized and the results of the groundwater testing will be used to determine disposal methods. Depending on the sample results, the purge waters can be disposed of to the sanitary sewer system (subsequent to approval by the municipality) or if impacts warrant, then the purge waters will be profiled and shipped off-site for disposal at a NYSDEC permitted facility. All waste containers for disposal should be staged in a secure area with controlled access. Pending transfer, all containers will be covered and secured when not immediately attended. Label all containers with regard to contents, origin, and date of generation. Use indelible ink for all labeling.

7. Decontamination

Sampling methods and equipment have been chosen to minimize decontamination requirements and to prevent the possibility of cross-contamination. Decontamination of equipment will be performed between discrete sampling locations. Equipment used to collect composite samples will not require decontamination between aliquots of the same composite sample. All sampling equipment will be decontaminated prior to sampling, after sampling each monitoring well, and after the completion of all sampling.

Decontamination will consist of:

- Alconox and water scrubbing with brushes; and
- Potable water rinse.

8. Sample Containers

The volumes and containers required for the sampling activities are included in pre-washed sample containers will be ordered directly from a firm, which prepares the containers in accordance with USEPA bottle washing procedures.

Table 1
Groundwater Samples
(all may not apply)

Type of Analysis	Type and Size of Container	Number of Containers and Sample Volume (per sample)	Preservation	Maximum Holding Time
Volatile Organics	40-ml glass vial with Teflon-backed septum	Two (2); fill completely, no air space	Cool to 4° C (ice in cooler), Hydrochloric acid to pH <2	7 days
Semi-volatile Organics	1,000-ml amber glass jar	One (1); fill completely	Cool to 4° C (ice in cooler)	7/40 days
Pesticides	1,000-ml amber glass jar	One (1); fill completely	Cool to 4° C (ice in cooler)	7/40 days
PCBs	1,000-ml amber glass jar	One (1); fill completely	Cool to 4° C (ice in cooler)	7/40 days
Metals	500-ml polyethylene	One (1); fill completely	Cool to 4° C (Nitric acid to pH <2	6 months

Notes: 1. Holding time is based on the times from verified time of sample receipt at the laboratory.

2. All sample bottles will be prepared in accordance with USEPA bottle washing procedures. These procedures are incorporated in LaBella's Quality Control Procedures Manual, January, 1992.

TABLE 2
Soil Samples

Type of Analysis	Type and Size of Container	Number of Containers and Sample Volume (per sample)	Preservation	Maximum Holding Time
Volatile Organics, Semi-volatile Organics, PCBs, and Pesticides	8-oz, glass jar with Teflon-lined cap	Two (2), fill as completely as possible	Cool to 4° C (ice in cooler)	7 days
RCRA Characterization	8-oz. glass jar with Teflon-lined cap	One (1); fill completely	Cool to 4° C (ice in cooler)	Must be extracted within 10 days; analyzed with 30 days

Notes: 1. Holding time is based on the times from verified time of sample receipt at the laboratory.

2. All sample bottles will be prepared in accordance with USEPA bottle washing procedures. These procedures are incorporated in LaBella's Quality Control Procedures Manual, January, 1992.

TABLE 3
List of Major Instruments for Sampling and Analysis

- Photovac Micro Tip PID or MiniRae PID
- Hollige Series 963 Nephlometer (turbidity meter)
- pH/Temperature/Conductivity Meter - Portable
- Hewlett Packard (HP) 1000 computer with RTE-6 operating system; and HP 9144 computer with RTE-4 operating system equipped with Aquarius software for control and data acquisition from gas chromatograph/mass spectrometer (GC/MS) systems; combined wiley and National Bureau of Standards (NBS) mass spectral library; and data archiving on magnetic tape
- Viriam 6000 and 37000 gas chromatrographs equipped with flame ionization, electron capture, photoionization and wall detectors as appropriate for various analyses,, and interfaced to Variam DS604 or D5634 data systems for processing data.
- Spectra-Physics Model SP 4100 and SP 4270 and Variam 4270 cam puting integrators
- Perkin Eimer (PE) 3000% and 3030% fully Automated Atomic Absorption Spectrophotometers (AAS) with Furnace Atomizer and background correction system
- PE Plasma II Inductively Coupled Argon Plasma (ICAP) Spectre meter with PE7500 laboratory computer
- Dionex 20001 ion chromatograph with conductivity detector for anion analysis, with integrating recorder

9. Sample Custody

This section describes standard operating procedures for sample identification and chain-of-custody to be

utilized for all Phase II field activities. The purpose of these procedures is to ensure that the quality of the samples is maintained during their collection, transportation, and storage through analysis. All chain-of-custody requirements comply with standard operating procedures indicated in USEPA sample handling protocol.

Sample identification documents must be carefully prepared so that sample identification and chain-of-custody can be maintained and sample disposition controlled. Sample identification documents include:

- Field notebooks,
- Sample label,
- Custody seals, and
- Chain-of-custody records.

10. Chain-of-Custody

The primary objective of the chain-of-custody procedures is to provide an accurate written or computerized record that can be used to trace the possession and handling of a sample from collection to completion of all required analyses. A sample is in custody if it is:

- In someone's physical possession;
- In someone's view;
- Locked up; or
- Kept in a secured area that is restricted to authorized personnel.

10.1. Field Custody Procedures

- As few persons as possible should handle samples.
- Sample bottles will be obtained precleaned from a source such as I-Chem. Coolers or boxes containing cleaned bottles should be sealed with a custody tape seal during transport to the field or while in storage prior to use.
- The sample collector is personally responsible for the care and custody of samples collected until they are transferred to another person or dispatched properly under chain-of-custody rules.
- The sample collector will record sample data in the notebook.
- The site manager will determine whether proper custody procedures were followed during the fieldwork and decide if additional samples are required.

10.2. Sample Tags

Sample tags attached to or affixed around the sample container must be used to properly identify all samples collected in the field. The sample tags are to be placed on the bottles so as not to obscure any QC lot numbers on the bottles; sample information must be printed in a legible manner using waterproof ink. Field identification must be sufficient to enable cross-reference with the logbook. For chain-of-custody purposes, all QC samples are subject to exactly the same custodial procedures and documentation as "real" samples.

10.3. Transfer of Custody and Shipment

- The coolers in which the samples are packed must be accompanied by a chain-of-custody record. When transferring samples, the individuals relinquishing and receiving them must sign, date, and note the time on the chain-of-custody record. This record documents sample custody transfer
- Shipping containers must be sealed with custody seals for shipment to the laboratory. The method of shipment, name of courier, and other pertinent information are entered in the "Remarks" section of the chain-of-custody record and traffic reports.
- All shipments must be accompanied by the chain-of-custody record identifying their contents. The original record accompanies the shipment. The other copies are distributed appropriately to the site manage.
- If sent by mail, the package is registered with return receipt requested. If sent by common carrier, a bill of lading is used. Freight bills, Postal Service receipts, and bill of lading are retained as part of the permanent documentation.

10.4. Chain-of-Custody Record

The chain-of-custody record must be fully completed in duplicate, using black carbon paper where possible, by the field technician who has been designated by the project manager as responsible for sample shipment to the appropriate laboratory for analysis. In addition, if samples are known to require rapid turnaround in the laboratory because of project time constraints or analytical concerns (e.g., extraction time or sample retention period limitations, etc.), the person completing the chain-of-custody record should note these constraints in the "Remarks" section of the record.

10.5. Laboratory Custody Procedures

A designated sample custodian accepts custody of the shipped samples and verifies that the sample identification number matches that on the chain-of-custody record and traffic reports, if required. Pertinent information as to shipment, pickup, and courier is entered in the "Remarks" section.

10.6. Custody Seals

Custody seals are preprinted adhesive-backed seals with security slots designed to break if the seals are disturbed. Sample shipping containers (coolers, cardboard boxes, etc., as appropriate) are sealed in as many places as necessary to ensure security. Seals must be signed and dated before use. On receipt at the laboratory, the custodian must check (and certify, by completing the package receipt log and LABMIS entries) that seals on boxes and bottles are intact. Strapping tape should be placed over the seals to ensure that seals are not accidentally broken during shipment.

11. Documentation

11.1. Sample Identification

All containers of samples collected from the project will be identified using the following format on a label or tag fixed to the sample container (labels are to be covered with Mylar tape):

XX-YY-O/D

- XX This set of initials indicates the specific Phase II sampling project
- YY These initials identify the sample location. Actual sample locations will be recorded in the task log.
- O/D An "O" designates an original sample; "D" identifies it as a duplicate.

Each sample will be labeled, chemically preserved, if required and sealed immediately after collection. To minimize handling of sample containers, labels will be filled out prior to sample collection. The sample label will be filled out using waterproof ink and will be firmly affixed to the sample containers and protected with Mylar tape. The sample label will give the following information:

- Name of sampler,
- Date and time of collection,
- Sample number,
- Analysis required,
- pH, and
- Preservation.

11.2. Daily Logs

Daily logs and data forms are necessary to provide sufficient data and observations to enable participants to reconstruct event that occurred during the project and to refresh the memory of the field personnel if called upon to give testimony during legal proceedings. All daily logs will be kept in a bound waterproof notebook containing numbered pages. All entries will be made in waterproof ink, dated, and signed. No pages will be removed for any reason. Corrections will be made according to the procedures given at the end of this section. The daily logs will include a site log and task log.

The site log is the responsibility of the site manager and will include a complete summary of the day's activity at the site.

The **Task Log** will include:

- Name of person making entry (signature).
- Names of team members on-site.
- Levels of personnel protection:
  - Level of protection originally used;
  - Changes in protection, if required; and
  - Reasons for changes.

- Time spent collecting samples.
- Documentation on samples taken, including:
  - Sampling location and depth station numbers;
  - Sampling date and time, sampling personnel;
  - Type of sample (grab, composite, etc.); and
  - Sample matrix.
- On-site measurement data.
- Field observations and remarks.
- Weather conditions, wind direction, etc.
- Unusual circumstances or difficulties.
- Initials of person recording the information.

12. Corrections to Documentation

12.1. Notebook

As with any data logbooks, no pages will be removed for any reason. If corrections are necessary, these must be made by drawing a single line through the original entry (so that the original entry can still be read) and writing the corrected entry alongside. The correction must be initialed and dated. Most corrected errors will require a footnote explaining the correction.

12.2. Sampling Forms

As previously stated, all sample identification tags, chain-of-custody records, and other forms must be written in waterproof ink. None of these documents are to be destroyed or thrown away, even if they are illegible or contain inaccuracies that require a replacement document.

If an error is made on a document assigned to one individual, that individual may make corrections simply by crossing a line through the error and entering the corrected information. The incorrect information should not be obliterated. Any subsequent error discovered on a document should be corrected by the person who made the entry. All corrections must be initialed and dated.

12.3. Photographs

Photographs will be taken as directed by the site manager. Documentation of a photograph is crucial to its validity as a representation of an existing situation. The following information will be noted in the task log concerning photographs:

- Date, time, location photograph was taken;
- Photographer (signature);
- Weather conditions;
- Description of photograph taken;
- Reasons why photograph was taken;
- Sequential number of the photograph and the film roll number; and
- Camera lens system used.

After the photographs have been developed, the information recorded in the field notebook should be transferred to the back of the photographs

13. Sample Handling, Packaging, and Shipping

The transportation and handling of samples must be accomplished in a manner that not only protects the integrity of the sample, but also prevents any detrimental effects due to the possible hazardous nature of samples. Regulations for packaging, marking, labeling, and shipping hazardous materials are promulgated by the United States Department of Transportation (DOT) in the Code of Federal Regulation, 49 CFR 171 through 177. All samples will be delivered to the laboratory with 24 to 48 hours from the day of collection.

All chain-of-custody requirements must comply with standard operating procedures in the USEPA sample handling protocol. All sample control and chain-of-custody procedures applicable to the Consultant are presented in the Field Personnel Chain-of-Custody Documentation and Quality Control Procedures Manual, January 1992.

13.1. Sample Packaging

Samples must be packaged carefully to avoid breakage or contamination and must be shipped to the laboratory at proper temperatures. The following sample packaging requirements will be followed:

- Sample bottle lids must never be mixed. All sample lids must stay with the original containers.
- The sample volume level can be marked by placing the top of the label at the appropriate sample height, or with a grease pencil. This procedure will help the laboratory to determine if any leakage occurred during shipment. The label should not cover any bottle preparation QC lot numbers.
- All sample bottles are placed in a plastic bag to minimize the potential for vermiculite contamination.
- Shipping coolers must be partially filled with packing materials and ice when required, to prevent the bottles from moving during shipment.
- The sample bottles must be placed in the cooler in such a way as to ensure that they do not touch one another.
- The environmental samples are to be cooled. The use of "blue ice" or some other artificial icing material is preferred. If necessary, ice may be used, provided that it is placed in plastic bags. Ice is not to be used as a substitute for packing materials.
- Any remaining space in the cooler should be filled with inert packing material. Under no circumstances should material such as sawdust, sand, etc., be used.
- A duplicate custody record and traffic reports, if required must be placed in a plastic bag and taped to the bottom of the cooler lid. Custody seals are affixed to the sample cooler.

13.2. Shipping Containers

Shipping containers are to be custody-sealed for shipment as appropriate. The container custody seal will consist of filament tape wrapped around the package at least twice and custody seals affixed in such a way that access to the container can be gained only by cutting the filament tape and breaking a seal.

Field personnel will make arrangements for transportation of samples to the lab. When custody is relinquished to a shipper, field personnel will telephone the lab custodian to inform him of the expected time of arrival of the sample shipment and to advise him of any time constraints on sample analysis. The lab must be notified as early in the week as possible, and in no case later than 3 p.m. (EST) on Thursday, regarding samples intended for Saturday delivery.

13.3. Marking and Labeling

- Use abbreviations only where specified.
- The words "This End Up" or "This Side Up" must be clearly printed on the top of the outer package. Upward pointing arrows should be placed on the sides of the package. The words "Laboratory Samples" should also be printed on the top of the package.
- After a sample container has been sealed, two chain-of-custody seals are placed on the container, one on the front and one on the back. The seals are protected from accidental damage by placing strapping tape over then.
- If samples are designated as medium or high hazard, they must be sealed in metal paint cans, placed in the cooler with vermiculite and labeled and placarded in accordance with DOT regulations.
- In addition, the coolers must also be labeled and placarded in accordance with DOT regulations if shipping medium and high hazard samples.

14. Calibration Procedures and Frequency

All instruments and equipment used during sampling and analysis will be operated, calibrated, and maintained according to the manufacturer's guidelines and recommendations as well as criteria set forth in the applicable analytical methodology references. Operation, calibration, and maintenance will be performed by personnel properly trained in these procedures. Documentation of all routine and special maintenance and calibration information will be maintained in an appropriate logbook or reference file, and will be available on request. Table 7-1 lists the major instruments to be used for sampling and analysis. Brief descriptions of calibration procedures for major field and laboratory instruments follow.

15. Field Instrumentation

15.1. Photovac Micro Tip Flameionizer (FID)

Standard operating procedures for the FID require that routine maintenance and calibration be performed every six months. Field calibration will be performed on a daily basis. The packages used for calibration are non-toxic analyzed gas mixtures available in pressurized containers.

15.2. Photovac/MiniRae Photoionization Detector (PID)

Standard operating procedures for the PID require that routine maintenance and calibration be performed every six months. Field calibration will be performed on a daily basis. The packages used for calibration are non-toxic analyzed gas mixtures available in pressurized containers.

15.3. Conductance, Temperature, and pH Meter

Temperature and conductance instruments are factory calibrated. Temperature accuracy can be checked against an NBS certified thermometer prior to field use if necessary. Conductance accuracy may be checked with a solution of known conductance and recalibration can be instituted, if necessary.

To recalibrate conductance, remove the black plug revealing the adjustment potentiometer screw. Add standard solution to cup, discard and refill. Repeat procedure until the digital display indicates the same value twice in a row. Adjust the potentiometer until the digital display indicates the known value of conductance. To increase the digital display reading, turn the adjustment potentiometer screw counter-clockwise (clockwise to decrease).

To standardize the pH electrode and meter, place the pH electrode in the 7.0 buffer bottle. Adjust the "ZERO" potentiometer on the face of the tester so that the digital display indicates 7.00.

Then place the pH electrode in the 4.0 or 10.0 buffer bottle (depending on where you expect the actual measurement to be). Adjust the "SLOPE" potentiometer on the face of the tester so that the digital display indicates the value of the buffer chosen.

Note: There is interaction between the "ZERO" and "SLOPE" adjustments, so the procedure should be repeated several times.

Do not subject the pH electrode to freezing temperatures.

It is good practice to rinse the electrode in distilled water when going from one buffer to another. When not in use the cap should be kept on the electrode. Keeping the cotton in the cap moist will keep the electrode ready to use. Moisten the cotton frequently (once a week, usually).

15.4. Nephelometer (Turbidity Meter)

The Series 95 nephelometer is calibrated before each use. Allow the instrument to warm up for approximately 2 hours. Using turbidity-free deionized water, zero the meter. Set the scale to 100, fill with a 40 NTU standard (AEPA-1 turbidity standard from Advanced Polymer Systems, Inc.), and insert into the instrument. Adjust the standardize control to give a readout of 200. Re-zero the instrument and repeat these steps with the scale set at 10 and 1 using 4.0 and 0.4 NTU standards, respectively. These standards are prepared by diluting aliquots of the 40 NTU standard.

16. Internal Quality Control Checks

QC data are necessary to determine precision and accuracy and to demonstrate the absence of interferences and/or contamination of field equipment. Field-based QC will comprise at least 10% of each data set generated and will consist of standards, replicates, spikes, and blanks. Field duplicates and field blanks will be analyzed by the laboratory as samples and will not necessarily be identified to the laboratory as duplicates or blanks. For each matrix, field duplicates will be provided at a rate of one per 10 samples collected or one per shipment, whichever is greater. Field blanks which consist of trip, routine field, and rinsate blanks will be provided at a rate of one per 20 samples collected for each parameter group, or one per shipment, whichever is greater.

Calculations will be performed for recoveries and standard deviations along with review of retention times, response factors, chromatograms, calibration, tuning, and all other QC information generated. All QC data, including split samples, will be documented in the site logbook. QC records will be retained and results reported with sample data.

16.1. Blank Samples

Blank samples are analyzed in order to assess possible contamination from the field and/or laboratory so that corrective measures may be taken, if necessary. Field samples are discussed in the following subsection:

16.2. Field Blanks

Various types of blanks are used to check the cleanliness of field handling methods. The following types of blanks may be used: the trip blank, the routine field blank, and the field equipment blank. They are analyzed in the laboratory as samples, and their purpose is to assess the sampling and transport procedures as possible sources of sample contamination. Field staff may add blanks if field circumstances are such that they consider normal procedures are not sufficient to prevent or control sample contamination, or at the direction of the project manager. Rigorous documentation of all blanks in the site logbooks is mandatory.

- **Routine Field Blanks** or bottle blanks are blank samples prepared in the field to access ambient field conditions. They will be prepared by filling empty sample containers with deionized water and any necessary preservatives. They will be handled like a sample and shipped to the laboratory for analysis.
- **Trip Blanks** are similar to routine field blanks with the exception that they are **not** exposed to field conditions. Their analytical results give the overall level of contamination from everything except ambient field conditions. For the RI/FS, one trip blank will be collected with every batch of water samples for volatile organic analysis. Each trip blank will be prepared by filling a 40-ml vial with deionized water prior to the sampling trip, transported to the site, handled like a sample, and returned to the laboratory for analysis without being opened in the field.
- **Field Equipment Blanks** are blank samples (sometimes called transfer blanks or rinsate blanks) designed to demonstrate that sampling equipment has been properly prepared and cleaned before field use, and that cleaning procedures between samples are sufficient to minimize cross contamination. If a sampling team is familiar with a particular site, they may be able to predict which areas or samples are likely to have the highest concentration of contaminants. Unless other constraints apply, these samples should be taken last to avoid

excessive contamination of sampling equipment.

16.3. Field Duplicates

Field duplicate samples consist of a set of two samples collected independently at a sampling location during a single sampling event. In some instances the field duplicate can be a blind duplicate, i.e., indistinguishable from other analytical samples so that personnel performing the analyses are not able to determine which samples are field duplicates. Field duplicates are designed to assess the consistency of the overall sampling and analytical system.

16.4. Quality Control Check Samples

Inorganic and organic control check samples are available from USEPA free of charge and are used as a means of evaluating analytical techniques of the analyst. Control check samples are subjected to the entire sample procedure, including extraction, digestion, etc., as appropriate for the analytical method utilized.

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LABELLA
LaBella Associates, P.C.
300 State Street
Rochester, New York 14614

Appendix 6
Health and Safety Plan

LABELLA
Associates, P.C.

Engineering
Architecture
Environmental

Site Health and Safety Plan

Location:

Stuart Park Complex – Ultralife Battery
2000 Technology Parkway
Newark, New York

Prepared For:

Ultralife Corporation
2000 Technology Parkway
Newark, New York

LaBella Project No. 209025

January 2010

Site Health and Safety Plan

Location:

Stuart Park Complex – Ultralife Battery
2000 Technology Parkway
Newark, New York

Prepared For:

Ultralife Corporation
2000 Technology Parkway
Newark, New York

LaBella Project No. 209025

January 2010

LaBella Associates, P.C.
300 State Street
Rochester, New York 14614

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SITE HEALTH AND SAFETY PLAN

Project Title:	Remedial Action Voluntary Cleanup Program Site #V00178-8
Project Number:	209025
Project Location (Site):	2000 Technology Parkway, Newark, New York
Environmental Director:	Gregory Senecal, CHMM
Project Manager:	Dan Noll, P.E.
Plan Review Date:	_____
Plan Approval Date:	_____
Plan Approved By:	_____ Mr. Richard Rote, CIH
Site Safety Supervisor:	Mike Pelychaty
Site Contact:	To Be Determined
Safety Director:	Rick Rote, CIH
Proposed Date(s) of Field Activities:	Anticipated for April 2010 (may vary)
Site Conditions:	Slightly sloping, encompassing approximately 14.24 acres
Site Environmental Information Provided By:	Prior Environmental Report by GeoQuest Environmental, Inc. dated December 2008.
Air Monitoring Provided By:	LaBella Associates, P.C.
Site Control Provided By:	Contractor(s)

LABELLA

EMERGENCY CONTACTS

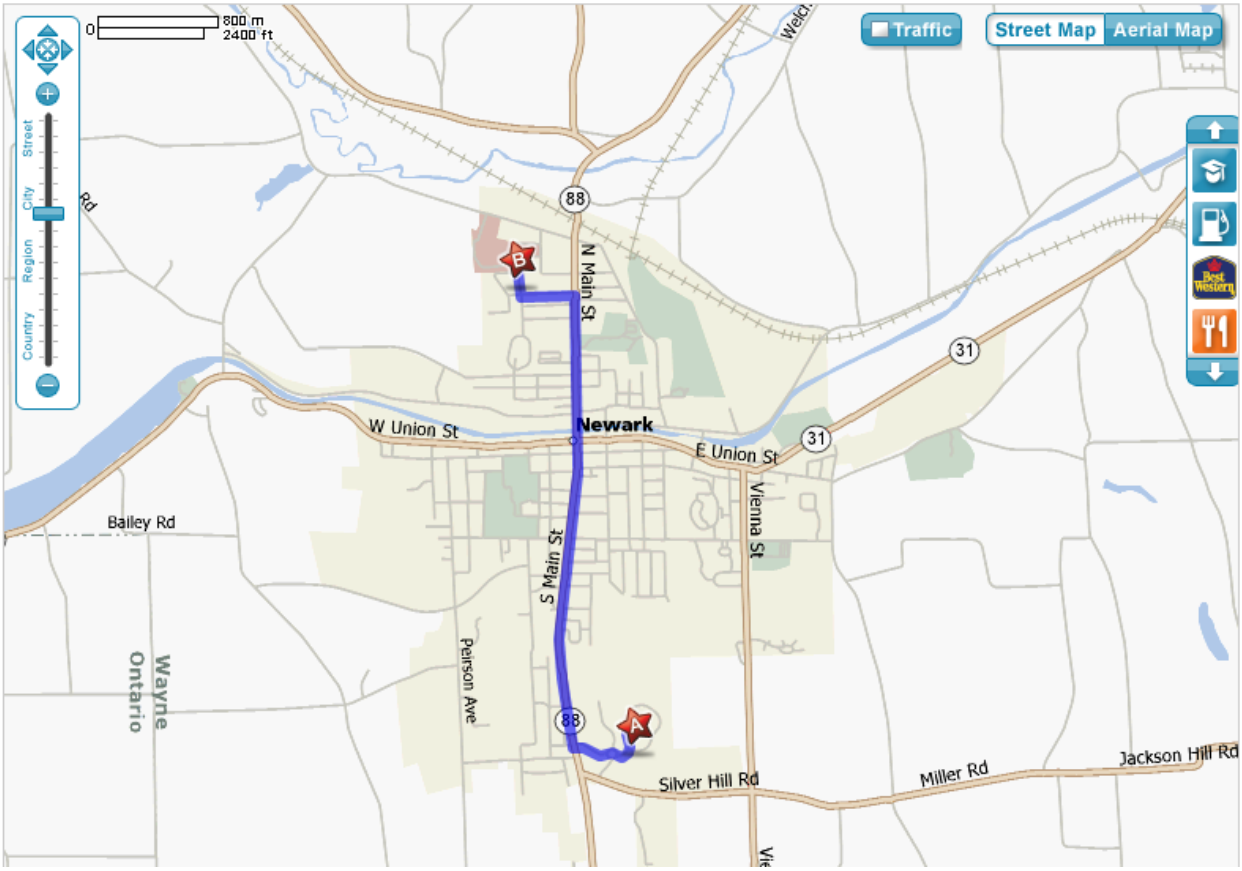
	Name	Phone Number
Ambulance:	As Per Emergency Service	911
Hospital Emergency:	Newark-Wayne Community Hospital	315-332-2022
Poison Control Center:	Finger Lakes Poison Control	585-273-3854
Police (local, state):	Newark Police Department	911
Fire Department:	Newark Fire Department	911
Site Contact:	John Diggory	Cell: 315-359-6329
Agency Contact:	NYSDEC – Charlotte Theobald Finger Lakes Poison Control NYSDOH – Melissa Menetti	585-226-5354 1-800-222-1222 1-800-458-1158 ext. 27860
Environmental Director:	Greg Senecal, CHMM	Direct: 585-295-6243 Cell: 585-752-6480 Home: 585-323-2142
Project Manager:	Dan Noll, P.E.	Direct: 585-295-611 Cell: 585-301-8458
Site Safety Supervisor:	Mike Pelychaty	Direct: 585-295-6253 Cell: 585-451-6225
Safety Director	Rick Rote, CIH	Direct: 585-295-6241

MAP AND DIRECTIONS TO THE MEDICAL FACILITY
NEWARK-WAYNE COMMUNITY HOSPITAL

Total Time: 8 minutes
Total Distance: 2.9 miles

Start: 2000 Technology Parkway, Newark, NY

START	1. Start out going **SOUTH** on **Technology Parkway**.	~500 ft.
	2. At the traffic circle, take the **2nd** exit and stay on **Technology Pkwy**.	0.2 mi
	3. Turn **right** at **S Main St/NY-88.**	2.3 mi
	4. Turn **left** at **Stuerwald Ave**	0.2 mi
	5. Turn **right** at **Driving Park Ave**	0.2 mi
END	6. End at 1200 Driving Park Ave, Newark, NY	
	Total Mileage/Time	~2.9 mi / 8 min



1.0 Introduction

The purpose of this Health and Safety Plan (HASP) it to provide guidelines for responding to potential health and safety issues that may be encountered during the Remedial Action (RA) at the Site located at 2000 Technology Parkway in the Village of Newark, Wayne County, New York. This HASP only reflects the policies of LaBella Associates P.C. The requirements of this HASP are applicable to all approved LaBella personnel at the work site. This document's project specifications and the Community Air Monitoring Plan (CAMP) are to be consulted for guidance in preventing and quickly abating any threat to human safety or the environment. The provisions of the HASP were developed in general accordance with 29 CFR 1910 and 29 CFR 1926 and do not replace or supersede any regulatory requirements of the USEPA, NYSDEC, OSHA or and other regulatory body.

2.0 Responsibilities

This HASP presents guidelines to minimize the risk of injury to project personnel, and to provide rapid response in the event of injury. The HASP is applicable only to activities of approved LaBella personnel and their authorized visitors. The Project Manager shall implement the provisions of this HASP for the duration of the project. It is the responsibility of LaBella employees to follow the requirements of this HASP, and all applicable company safety procedures.

3.0 Activities Covered

The activities covered under this HASP are limited to the following:

- Management of environmental remediation activities
- Environmental Monitoring
- Collection of samples
- Management of excavated soil, sediments and water.

4.0 Work Area Access and Site Control

The contractor(s) will have primary responsibility for work area access and site control.

5.0 Potential Health and Safety Hazards

This section lists some potential health and safety hazards that project personnel may encounter at the project site and some actions to be implemented by approved personnel to control and reduce the associated risk to health and safety. This is not intended to be a complete listing of any and all potential health and safety hazards. New or different hazards may be encountered as site environmental and site work conditions change. The suggested actions to be taken under this plan are not to be substituted for good judgment on the part of project personnel. At all times, the Site Safety Officer has responsibility for site safety and his or her instructions must be followed.

5.1 Hazards Due to Heavy Machinery

Potential Hazard:
Heavy machinery including trucks, excavators, backhoes, etc will be in operation at the site. The presence of such equipment presents the danger of being struck or crushed. Use caution when working near heavy machinery.

Protective Action:
Make sure that operators are aware of your activities, and heed operator's instructions and warnings. Wear bright colored clothing and walk safe distances from heavy equipment. A hard hat, safety glasses and steel toe shoes are required.

5.2 Excavation Hazards

Potential Hazard:
Excavations and trenches can collapse, causing injury or death. Edges of excavations can be unstable and collapse. Toxic and asphyxiant gases can accumulate in confined spaces and trenches. Excavations that require working within the excavation will require air monitoring in the breathing zone (refer to Section 9.0).

Excavations left open create a fall hazard which can cause injury or death.

Protective Action:
Personnel must receive approval from the Project Manager to enter an excavation for any reason. Subsequently, approved personnel are to receive authorization for entry from the Site Safety Officer. Approved personnel are not to enter excavations over 4 feet in depth unless excavations are adequately sloped. Additional personal protective equipment may be required based on the air monitoring.

Personnel should exercise caution near all excavations at the site as it is expected that excavation sidewalls will be unstable.

Fencing and/or barriers accompanied by "no trespassing" signs should be placed around all excavations when left open for any period of time when work is not being conducted.

5.3 Cuts, Punctures and Other Injuries

Potential Hazard:
In any excavation or construction, work site there is the potential for the presence of sharp or jagged edges on rock, metal materials, and other sharp objects. Serious cuts and punctures can result in loss of blood and infection.

Protective Action:
The Project Manager is responsible for making First Aid supplies available at the work site to treat minor injuries. The Site Safety Officer is responsible for arranging the transportation of authorized on-site personnel to medical facilities when First Aid treatment in not sufficient. Do not move seriously injured workers. All injuries requiring treatment are to be reported to the Project Manager. Serious injuries are to be reported immediately to the Site Safety Officer

5.4 Injury Due to Exposure of Chemical Hazards

Potential Hazards:
Volatile organic vapors from petroleum products, chlorinated solvents or other chemicals may be encountered during excavation activities at the project work site. Inhalation of high concentrations of organic vapors can cause headache, stupor, drowsiness, confusion and other health effects. Skin contact can cause irritation, chemical burn, or dermatitis.

Protective Action:
The presence of organic vapors may be detected by their odor and by monitoring instrumentation. Approved employees will not work in environments where hazardous concentrations of organic vapors are present. Air monitoring (refer to Section 9.0) of the work area will be performed at least every 60 minutes or more often using a Photoionization Detector (PID). Personnel are to leave the work area whenever PID measurements of ambient air exceed 25 ppm consistently for a 5 minute period. In the event that sustained total volatile organic compound (VOC) readings of 25 ppm are encountered personnel should upgrade personal protective equipment to Level C (refer to Section 8.0) and an Exclusion Zone should be established around the work area to limit and monitor access to this area (refer to Section 6.0).

5.5 Injuries Due to Extreme Hot or Cold Weather Conditions

Potential Hazards:
Extreme hot weather conditions can cause heat exhaustion, heat stress and heat stroke or extreme cold weather conditions can cause hypothermia.

Protective Action:
Precaution measures should be taken such as dress appropriately for the weather conditions and drink plenty of fluid. If personnel should suffer from any of the above conditions, proper techniques should be taken to cool down or heat up the body and taken to the nearest hospital if needed.

5.6 Biological Hazards

Potential Hazards:
Biological hazards include insects, snakes, poisonous/irritant plants, and wild animals.

Protective Action:
Precaution measures should be taken to dress appropriately in order to avoid contact with biological hazards. Based on the location of the work and the heavy equipment employed, wild animals are not anticipated to be a significant concern; however, in the event wild animals are observed, personnel should avoid contact with animals and attempt to scare animals off (e.g., honking a horn or yelling). In the event animals are not deterred or appear rabid, the local game warden and/or NYSDEC should be contacted.

6.0 Work Zones

In the event that conditions warrant establishing various work zones (i.e., based on hazards - Section 5.4), the following work zones should be established:

Exclusion Zone (EZ):
The EZ will be established in the immediate vicinity and adjacent downwind direction of site activities that elevate breathing zone VOC concentrations to unacceptable levels based on field screening. These site activities include contaminated soil excavation and soil sampling activities. If access to the site is required to accommodate non-project related personnel then an EZ will be established by constructing a barrier around the work area (yellow caution tape and/or construction fencing). The EZ barrier shall encompass the work area and any equipment staging/soil staging areas necessary to perform the associated work. The contractor(s) will be responsible for establishing the EZ and limiting access to approved personnel. Depending on the condition for establishing the EZ, access to the EZ may require adequate PPE (e.g., Level C).

Contaminant Reduction Zone (CRZ):
The CRZ will be the area where personnel entering the EZ will don proper PPE prior to entering the EZ and the area where PPE may be removed. The CRZ will also be the area where decontamination of equipment and personnel will be conducted as necessary.

7.0 Decontamination Procedures

Upon leaving the work area, approved personnel shall decontaminate footwear as needed. Under normal work conditions, detailed personal decontamination procedures will not be necessary. Work clothing may become contaminated in the event of an unexpected splash or spill or contact with a contaminated substance. Minor splashes on clothing and footwear can be rinsed with clean water. Heavily contaminated clothing should be removed if it cannot be rinsed with water. Personnel assigned to this project should be prepared with a change of clothing whenever on site.

Personnel will use the contractor's disposal container for disposal of PPE.

8.0 Personal Protective Equipment

Generally, site conditions at this work site require level of protection of Level D or modified Level D. However, air monitoring will be conducted to determine if up-grading to Level C PPE is required (refer to Section 9.0). Descriptions of the typical safety equipment associated with Level D and Level C are provided below:

Level D:
Hard hat, safety glasses, rubber nitrile sampling gloves, steel toe construction grade boots, etc.

Level C:
Level D PPE and full or ½-face respirator and tyvek suit (if necessary). [*Note: Organic vapor cartridges are to be changed after each 8-hours of use or more frequently.*]

9.0 Air Monitoring

According to 29 CFR 1910.120(h), air monitoring shall be used to identify and quantify airborne levels of hazardous substances and health hazards in order to determine the appropriate level of employee protection required for personnel working onsite. Air monitoring will consist at a minimum of the procedure listed below. Air monitoring instruments will be calibrated and maintained in accordance with the manufacturer's specifications.

The Air Monitor will utilize a photoionization Detector (PID) to screen the ambient air in the work areas (excavation, soil staging, and soil grading areas) for total Volatile Organic Compounds (VOCs) and a DustTrak tm Model 8520 aerosol monitor or equivalent for measuring particulates. Work area ambient air will generally be monitored in the work area and downwind of the work area. Air monitoring of the work areas and downwind of the work areas will be performed at least every 60 minutes or more often using a PID, and the DustTrak meter.

If sustained PID readings of greater than 25 ppm are recorded in the breathing zone, then either personnel are to leave the work area until satisfactory readings are obtained or approved personnel may re-enter the work areas wearing at a minimum a ½ face respirator with organic vapor cartridges for an 8-hour duration (i.e., upgrade to Level C PPE). Organic vapor cartridges are to be changed after each 8-hours of use or more frequently, if necessary. If PID readings are sustained, in the work area, at levels above 50 ppm for a 5 minute average, work will be stopped immediately until safe levels of VOCs are encountered or additional PPE will be required (i.e., Level B).

If dust concentrations exceed the upwind concentration by 100 $\mu g/m^3$ (0.1 mg/m^3) consistently for a 10 minute period within the work area or at the downwind location, then LaBella personnel may not re-enter the work area until dust concentrations in the work area decrease below 100 $\mu g/m^3$ (0.1 mg/m^3), which may be accomplished by the construction manager implementing dust control or suppression measures.

10.0 Emergency Action Plan

In the event of an emergency, employees are to turn off and shut down all powered equipment and leave the work areas immediately. Employees are to walk or drive out of the Site as quickly as possible and wait at the assigned 'safe area'. Follow the instructions of the Site Safety Officer.

Employees are not authorized or trained to provide rescue and medical efforts. Rescue and medical efforts will be provided by local authorities.

11.0 Medical Surveillance

Medical surveillance will be provided to all employees who are injured due to overexposure from an emergency incident involving hazardous substances at this site.

12.0 Employee Training

Personnel who are not familiar with this site plan will receive training on its entire content and organization before working at the Site.

Individuals directly involved with the remedial work will be 40-hour OSHA HAZWOPER trained with current 8-hour refresher certification.

Y:\ULTRALIFE CORPORATION\209025\REPORTS\SMP\APPENDICES FINAL\APP 6 - HASP.DOC

Table 1
Exposure Limits and Recognition Qualities

Compound	PEL-TWA (ppm)(b)(d)	TLV-TWA (ppm)(c)(d)	STEL (ppm)(b)	LEL (%)(e)	UEL (%)(f)	IDLH (ppm)(g)(d)	Odor	Odor Threshold (ppm)	Ionization Potential
Acetone	750	500	NA	2.15	13.2	20,000	Sweet	4.58	9.69
Anthracene	.2	.2	NA	NA	NA	NA	Faint aromatic	NA	NA
Benzene	1	0.5	5	1.3	7.9	3000	Pleasant	8.65	9.24
Benzo (a) pyrene (coal tar pitch volatiles)	0.2	0.1	NA	NA	NA	700	NA	NA	NA
Benzo (a)anthracene	NA	NA	NA	NA	NA	NA	NA	NA	NA
Benzo (b) Fluoranthene	NA	NA	NA	NA	NA	NA	NA	NA	NA
Benzo (g,h,i)perylene	NA	NA	NA	NA	NA	NA	NA	NA	NA
Benzo (k) Fluoranthene	NA	NA	NA	NA	NA	NA	NA	NA	NA
Bromodichloromethane	NA	NA	NA	NA	NA	NA	NA	NA	10.88
Carbon Disulfide	20	1	NA	1.3	50	500	Odorless or strong garlic type	.096	10.07
Chlorobenzene	75	10	NA	1.3	9.6	2,400	Faint almond	0.741	9.07
Chloroform	50	2	NA	NA	NA	1,000	ethereal odor	11.7	11.42
Chrysene	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-Dichloroethylene	200	200	NA	9.7	12.8	400	Acrid	NA	9.65
1,2-Dichlorobenzene	50	25	NA	2.2	9.2		Pleasant		9.07
Ethylbenzene	100	100	NA	1.0	6.7	2,000	Ether	2.3	8.76
Fluoranthene	NA	NA	NA	NA	NA	NA	NA	NA	NA
Fluorene	NA	NA	NA	NA	NA	NA	NA	NA	NA
Isopropylbenzene	NA	NA	NA	NA	NA	NA	NA	NA	NA
Methylene Chloride	500	50	NA	12	23	5,000	Chloroform-like	10.2	11.35
Naphthalene	10, Skin	10	NA	0.9	5.9	250	Moth Balls	0.3	8.12
n-propylbenzene	NA	NA	NA	NA	NA	NA	NA	NA	NA
Phenanthrene	NA	NA	NA	NA	NA	NA	NA	NA	NA
Pyrene	NA	NA	NA	NA	NA	NA	NA	NA	NA
p-Isopropylbenzene	NA	NA	NA	NA	NA	NA	NA	NA	NA
sec-Butylbenzene	NA	NA	NA	NA	NA	NA	NA	NA	NA
Tetrachloroethane	NA	NA	NA	NA	NA	NA	Sweet	NA	NA
Toluene	100	100	NA	0.9	9.5	2,000	Sweet	2.1	8.82
Trichloroethylene	100	50	NA	8	12.5	1,000	Chloroform	1.36	9.45
1,2,4-Trimethylbenzene	NA	25	NA	0.9	6.4	NA	Distinct	2.4	NA
1,3,5-Trimethylbenzene	NA	25	NA	NA	NA	NA	Distinct	2.4	NA
Vinyl Chloride	1	1	NA	NA	NA	NA	NA	NA	NA
Xylenes (o,m,p)	100	100	NA	1	7	1,000	Sweet	1.1	8.56
Metals									
Arsenic	0.01	0.2	NA	NA	NA	100, Ca	Almond		NA
Cadmium	0.2	0.5	NA	NA	NA				NA
Chromium	1	0.5	NA	NA	NA				NA
Lead	0.05	0.15	NA	NA	NA	700			NA
Mercury	0.05	0.05	NA	NA	NA	28	Odorless		NA
Selenium	0.2	0.02	NA	NA	NA	Unknown			NA

(a) Skin = Skin Absorption
(b) OSHA-PEL Permissible Exposure Limit (flame weighted average, 8-hour): NIOSH Guide, June 1990
(c) ACGIH – 8 hour time weighted average from Threshold Limit Values and Biological Exposure Indices for 2003.
(d) Metal compounds in mg/m3
(e) Lower Exposure Limit (%)
(f) Upper Exposure Limit (%)
(g) Immediately Dangerous to Life or Health Level: NIOSH Guide, June 1990.

Notes:
1. All values are given in parts per million (PPM) unless otherwise indicated.
2. Ca = Possible Human Carcinogen, no IDLH information.

LABELLA
LaBella Associates, P.C.
300 State Street
Rochester, New York 14614

Appendix 7

Site-Wide Inspection For

LABELLA Associates, P.C.

300 State Street
Rochester, New York 14614
Phone: (585) 454-6110
Fax: (585) 454-3066

SITE-WIDE INSPECTION FORM
Project Name: NYSDEC Site No. V00178-8
Location: Ultralife Corporation, 2000 Technology Parkway, Newark, New York 14513
Project No.: 209025
Inspected By:
Date of Inspection:
Weather Conditions:

1. COMMNETS ON GENERAL SITE CONDITIONS: _____

2. CURRENT USE OF SITE: _____

3. ARE CURRENT SOIL CONDITIONS IN ACCORDANCE WITH THE EXCAVATION WORK PLAN? YES/NO

If No, Explain and indicate actions to be taken: _____

4. PHOTOGRAPHS TAKEN OF OUTFALL AREAS? YES/NO

5. SITE RECORDS UP TO DATE? YES/NO

COMMENTS AND/OR ACTIONS TAKEN

LABELLA
LaBella Associates, P.C.
300 State Street
Rochester, New York 14614

Appendix 8

Community Air Monitoring Plan

Appendix 1A
New York State Department of Health
Generic Community Air Monitoring Plan

Overview

A Community Air Monitoring Plan (CAMP) requires real-time monitoring for volatile organic compounds (VOCs) and particulates (i.e., dust) at the downwind perimeter of each designated work area when certain activities are in progress at contaminated sites. The CAMP is not intended for use in establishing action levels for worker respiratory protection. Rather, its intent 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 investigative and remedial work activities. The action levels specified herein require increased monitoring, corrective actions to abate emissions, and/or work shutdown. Additionally, the CAMP helps to confirm that work activities did not spread contamination off-site through the air.

The generic CAMP presented below will be sufficient to cover many, if not most, sites. Specific requirements should be reviewed for each situation in consultation with NYSDOH to ensure proper applicability. In some cases, a separate site-specific CAMP or supplement may be required. Depending upon the nature of contamination, chemical- specific monitoring with appropriately-sensitive methods may be required. Depending upon the proximity of potentially exposed individuals, more stringent monitoring or response levels than those presented below may be required. Special requirements will be necessary for work within 20 feet of potentially exposed individuals or structures and for indoor work with co-located residences or facilities. These requirements should be determined in consultation with NYSDOH.

Reliance on the CAMP should not preclude simple, common-sense measures to keep VOCs, dust, and odors at a minimum around the work areas.

Community Air Monitoring Plan

Depending upon the nature of known or potential contaminants at each site, real-time air monitoring for VOCs and/or particulate levels at the perimeter of the exclusion zone or work area will be necessary. Most sites will involve VOC and particulate monitoring; sites known to be contaminated with heavy metals alone may only require particulate monitoring. If radiological contamination is a concern, additional monitoring requirements may be necessary per consultation with appropriate DEC/NYSDOH staff.

Continuous monitoring will be required for all ground intrusive activities and during the demolition of contaminated or potentially contaminated structures. Ground intrusive activities include, but are not limited to, soil/waste excavation and handling, test pitting or trenching, and the installation of soil borings or monitoring wells.

Periodic monitoring for VOCs will be required during non-intrusive activities such as the collection of soil and sediment samples or the collection of groundwater samples from existing monitoring wells. “Periodic” monitoring during sample collection might reasonably consist of taking a reading upon arrival at a sample location, monitoring while opening a well cap or

overturning soil, monitoring during well baling/purging, and taking a reading prior to leaving a sample location. In some instances, depending upon the proximity of potentially exposed individuals, continuous monitoring may be required during sampling activities. Examples of such situations include groundwater sampling at wells on the curb of a busy urban street, in the midst of a public park, or adjacent to a school or residence.

VOC Monitoring, Response Levels, and Actions

Volatile organic compounds (VOCs) must be monitored at the downwind perimeter of the immediate work area (i.e., the exclusion zone) on a continuous basis or as otherwise specified. Upwind concentrations should be measured at the start of each workday and periodically thereafter to establish background conditions, particularly if wind direction changes. The monitoring work should be performed using equipment appropriate to measure the types of contaminants known or suspected to be present. The equipment should be calibrated at least daily for the contaminant(s) of concern or for an appropriate surrogate. The equipment should be capable of calculating 15-minute running average concentrations, which will be compared to the levels specified below.

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 (ppm) 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 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 over background but less than 25 ppm, 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 over background for the 15-minute average.

3. If the organic vapor level is above 25 ppm at the perimeter of the work area, activities must be shutdown.

4. 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.

Particulate Monitoring, Response Levels, and Actions

Particulate concentrations should be monitored continuously at the upwind and downwind perimeters of the exclusion 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 (mcg/m^3) 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. Work may continue with dust suppression techniques provided that downwind PM-10 particulate levels do not exceed 150 mcg/m^3 above the upwind level and provided that no visible dust is migrating from the work area.

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 other controls are successful in reducing the downwind PM-10 particulate concentration to within 150 mcg/m^3 of the upwind level and in preventing visible dust migration.

3. All readings must be recorded and be available for State (DEC and NYSDOH) and County Health personnel to review.

December 2009

Appendix 1B
Fugitive Dust and Particulate Monitoring

A program for suppressing fugitive dust and particulate matter monitoring at hazardous waste sites is a responsibility on the remedial party performing the work. These procedures must be incorporated into appropriate intrusive work plans. The following fugitive dust suppression and particulate monitoring program should be employed at sites during construction and other intrusive activities which warrant its use:

1. Reasonable fugitive dust suppression techniques must be employed during all site activities which may generate fugitive dust.

2. Particulate monitoring must be employed during the handling of waste or contaminated soil or when activities on site may generate fugitive dust from exposed waste or contaminated soil. Remedial activities may also include the excavation, grading, or placement of clean fill. These control measures should not be considered necessary for these activities.

3. Particulate monitoring must be performed using real-time particulate monitors and shall monitor particulate matter less than ten microns (PM10) with the following minimum performance standards:

(a) Objects to be measured: Dust, mists or aerosols;
(b) Measurement Ranges: 0.001 to 400 mg/m3 (1 to 400,000 :ug/m3);
(c) Precision (2-sigma) at constant temperature: +/- 10 :g/m3 for one second averaging; and +/- 1.5 g/m3 for sixty second averaging;
(d) Accuracy: +/- 5% of reading +/- precision (Referred to gravimetric calibration with SAE fine test dust (mmd= 2 to 3 :m, g= 2.5, as aerosolized);
(e) Resolution: 0.1% of reading or 1g/m3, whichever is larger;
(f) Particle Size Range of Maximum Response: 0.1-10;
(g) Total Number of Data Points in Memory: 10,000;
(h) Logged Data: Each data point with average concentration, time/date and data point number
(i) Run Summary: overall average, maximum concentrations, time/date of maximum, total number of logged points, start time/date, total elapsed time (run duration), STEL concentration and time/date occurrence, averaging (logging) period, calibration factor, and tag number;
(j) Alarm Averaging Time (user selectable): real-time (1-60 seconds) or STEL (15 minutes), alarms required;
(k) Operating Time: 48 hours (fully charged NiCd battery); continuously with charger;
(l) Operating Temperature: -10 to 50^{o} C (14 to 122^{o} F);
(m) Particulate levels will be monitored upwind and immediately downwind at the working site and integrated over a period not to exceed 15 minutes.

4. 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 remedial party to adequately supplement QA/QC Plans to include the following critical features: periodic instrument calibration, operator training, daily instrument performance (span) checks, and a record keeping plan.

5. The action level will be established at 150 ug/m3 (15 minutes average). While conservative,

this short-term interval will provide a real-time assessment of on-site air quality to assure both health and safety. 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 (see paragraph 7). Should the action level of 150 ug/m3 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.

6. It must be recognized that the generation of dust from waste or contaminated soil that migrates off-site, has the potential for transporting contaminants off-site. There may be situations when dust is being generated and leaving the site and the monitoring equipment does not measure PM10 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. Activities that have a high dusting potential--such as solidification and treatment involving materials like kiln dust and lime--will require the need for special measures to be considered.

7. 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 150ug/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. Using atomizing sprays will prevent overly wet conditions, conserve water, and provide an effective means of suppressing the fugitive dust.

8. The evaluation of weather conditions is necessary for proper fugitive dust control. When extreme wind conditions make dust control ineffective, as a last resort remedial actions may need to be suspended. There may be situations that require fugitive dust suppression and particulate monitoring requirements with action levels more stringent than those provided above. Under some circumstances, the contaminant concentration and/or toxicity may require additional monitoring to protect site personnel and the public. Additional integrated sampling and chemical analysis of the dust may also be in order. This must be evaluated when a health and safety plan is developed and when appropriate suppression and monitoring requirements are established for protection of health and the environment.

LABELLA
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300 State Street
Rochester, New York 14614

Appendix 9
Deed Restriction

Do Not Detach

Wayne County Clerk's Office

Recording Page

Receipt Number: 11-10640

Declaration Covenants
Instrument Number: R9128382

Date/Time: 06/06/2011 11:51 AM

First OR: ULTRALIFE CORPORATION

First EE: NO GRANTEE

Town: ARCADIA TOWN OF
Town: NEWARK VILLAGE

Pages: 6
Employee Id: md
Serial Number:

Transfer Tax Number:

-FEES-	
Recording and Filing	$70.00
Transfer Tax	$0.00
Basic Tax	
Local Tax	
Additional Tax	
Special Tax	
Withheld	
Total	$70.00
-MORTGAGE TAX-	$0.00
Amount Taxed	
-TRANSFER TAX-	
Consideration Amount	

State of New York
County of Wayne

***** WARNING - This sheet constitutes the Clerks endorsement required by Section 319 of the Real Property Law of the State of New York.**

Wayne County Clerk

*****DO NOT DETACH*****
*****THIS IS NOT A BILL*****

DECLARATION of COVENANTS and RESTRICTIONS

THIS COVENANT is made the 24th day of May, 2011 by Ultralife Corporation (formerly known as Ultralife Batteries, Inc. and hereinafter "Ultralife"), a corporation organized and existing under the laws of the State of Delaware and having an office for the transaction of business at 2000 Technology Parkway (formerly 1350 Route 88 South), Newark, New York 14513.

WHEREAS, Ultralife owns a parcel of real property at 1350 Route 88 South (new address 2000 Technology Parkway) in the Village of Newark, County of Wayne, State of New York, Tax ID Map 14 Parcel 499340 (formerly Tax Map Parcel No. 36110-14-423352.3) (the "Property"), which Property was conveyed by the Wayne County Industrial Development Agency to Ultralife Batteries, Inc, (now known as Ultralife Corporation) by deed dated February 14, 2008 and recorded in the Wayne County Clerk's Office as electronic instrument number R9093873; and

WHEREAS, a portion of the Property is the subject of Voluntary Cleanup Program Agreement No. B8-0537-98-08 ("Voluntary Agreement"), dated January 8, 2001, executed by Ultralife Batteries, Inc. as part of the New York State Department of Environmental Conservation's (the "Department") Voluntary Cleanup Program; the Property and the Voluntary Cleanup Program Site (the "VCP Site") are more particularly described on the survey attached to this Declaration in Appendix "A"; and

WHEREAS, the Department approved a remedy for the VCP Site which is protective of public health and the environment for the Contemplated Use as defined in the Voluntary Agreement and such remedy requires that the Property be subject to certain restrictive covenants.

NOW, THEREFORE, Ultralife, for itself and its successors and/or assigns, covenants that:

First, the VCP Site subject to this Declaration of Covenants and Restrictions is as shown on the survey attached to this Declaration as Appendix "A" ("VCP Site" is identified on the survey) and made a part hereof.

Second, unless prior written approval is first obtained from 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", any future construction, use or occupancy at the VCP Site which involves disturbance or excavation below the top two feet of the soil cover system, must be conducted in accordance with the Department approved Site Management Plan (described below).

Third, unless the owner first obtains permission to discontinue such controls from the Department or Relevant Agency, the owner of the VCP Site shall continue in full force and

effect this deed restriction, and the engineering controls required for the remedy, and shall comply with the Department approved Site Management Plan ("SMP") (and modifications as approved by the Department or Relevant Agency) which describes the engineering controls required. The SMP is incorporated into this Declaration and made enforceable hereto.

An up-to-date version of the SMP may be obtained from:

Regional Remediation Engineer: or
Region 8
NYS DEC
6274 East Avon-Lima Road
East Avon, NY 14414

Site Control Section
Division of Environmental Remediation
NYS DEC
625 Broadway
Albany, NY 12233

Fourth, the owner of the VCP Site is permitted to use the VCP Site for commercial or industrial purposes but shall be prohibited from using the VCP Site for other purposes without the express written waiver of such prohibition by the Department or Relevant Agency.

Fifth, the owner of the VCP Site shall prohibit the use of the groundwater underlying the VCP 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.

Sixth, the owner of the VCP Site shall allow the Department, its agents, employees, or other representatives of the State to enter and inspect the VCP Site in a reasonable manner and at reasonable times to assure compliance with the above-stated restrictions.

Seventh, the owner of the VCP Site shall submit to the Department an annual written statement by an expert the Department finds acceptable certifying that the controls at the VCP Site are unchanged from the previous certification, or that any changes to the controls were approved by the Department or the Relevant Agency, and that nothing has occurred that would impair the ability of such controls to protect the public health or the environment.

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 VCP 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 required to be recorded, and hereby covenant not to contest the authority of the Relevant Agency to seek enforcement.

Ninth, any deed of conveyance of the VCP 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.

Ultralife Corporation

By: _____
Peter F. Comerford
Secretary

STATE OF NEW YORK)
) ss:
COUNTY OF WAYNE)

On the 24th day of May, in the year 2011, before me the undersigned, personally appeared Peter F. Comerford, 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 he executed the same in his capacity, and that by his signature on the instrument, the individual, or the person upon behalf of which the individual acted, executed the instrument.

_____
Notary Public, State of New York

WANDA A. VANDERLEE
Notary Public in the State of New York
Wayne County
Commission Expires December 15, 2014