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V000189-9

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August 16, 1999

New York State Department of Environmental Conservation
Division of Environmental Remediation
270 Michigan Avenue
Buffalo, New York 14203-2999

Attention: Mr. Maurice Moore
Project Manager, Hazardous Waste Remediation

Subject: **Summary of Findings**
Former Manual Screen Wash Area
Champion Products Facility
Perry, New York
DEC Site No: V00018-9
Delta Project No: S098-009

Dear Maurice:

The purpose of this letter is to present the findings of the investigation in the former manual screen wash area. The scope of work, as outlined in a letter submitted to the New York Department of Environmental Conservation (Department) on June 4, 1999, was completed on June 30, 1999. Investigation of the former manual screen wash area was initiated as part of the investigation Champion Products Company is performing in anticipation of entering into a Voluntary Cleanup Agreement with the Department.

Background

During the week of May 3, 1999, the concrete vault located adjacent to the existing screen wash area was removed and upgraded with a fiberglass system. During the removal activities, Delta's subcontractor, Mr. Donald Butler, indicated that he recalled installing a concrete overflow vault in the vicinity of the former manual screen wash area in the early 1980's. According to Mr. Butler, a steel holding tank was previously used as part of the manual screen washing activities, prior to the replacement with the concrete overflow vault. Discussions with facility personnel also indicated the historical usage of the concrete overflow vault and steel holding tank. Neither Mr. Butler nor facility personnel were aware of the exact location of the vault or if the vault had been removed from the subsurface. The vault was believed to be located outside of the facility building, adjacent to the former manual screen wash area, as illustrated in Figure 1.

On June 10, 1999, a geophysical survey was performed in the area of the former screen wash area, south of the equipment shed. This survey indicated a magnetic anomaly in the area illustrated in Figure 1. The boundaries of this anomaly were marked with paint, and two test pits were excavated in the area of the anomaly on June 30, 1999 to verify the presence/absence of the suspected vault.

The following is a summary of methodology used, results of the geophysical survey and the results of the test pit excavations.

Geophysical Survey

Delta contracted Enviroscan, Inc. to perform the geophysical survey. The purpose of performing the geophysical survey was to confirm the presence or absence of the overflow vault and to locate any underground utilities prior to installation of the proposed dual phase vapor extraction system. In order to ensure detection of the widest possible range of subsurface utilities and structures (i.e. the overflow vault), the geophysical survey was completed using the following equipment:

- A Fisher TW-6 electromagnetic (EM) pipe and cable tracer: A deep-sensing metal detector that detects highly electrically conductive materials by creating a magnetic field with a transmitting coil.
- A Radiodetection C.A.T and Genny pipe and cable tracer: Capable of following an exposed utility and tracing through the subsurface.
- A GSSI SIR-2 ground penetrating radar (GPR) system: GPR systems are able to confirm utilities detected using the above-mentioned methods, and to provide detection of potential non-metallic utilities or structures (i.e., PVC pipe, terra cotta or non-reinforced concrete). Ground penetrating radar operates by transmitting pulses of high frequency radio waves down into the ground through a transducer or antenna. The energy is reflected from various buried objects or distinct contacts between earth materials. The antenna receives the reflected waves and logs them on a control unit.

Geophysical Results

Results of the geophysical survey performed in the former screen wash area indicated a large, apparently metal-rich target with a roughly rectangular shape just south of the equipment shed, as shown one Figure 1. GPR results indicated that the magnetic anomaly did not produce high amplitude, parabolic-shaped reflections of the type commonly associated with cylindrical UST's, however, the magnetic anomaly could have represented a flat-topped concrete vault. A copy of the Enviroscan Geophysical Survey is enclosed.

Test Pits

On June 30, 1999, Delta advanced two test pits in the area identified by the geophysical survey, as shown in Figure 1. Mr. Maurice Moore of the Department was present to observe this activity.

Test Pit 1 was advanced to a depth of 7 feet below ground surface (bgs), was excavated in a north/south direction and was approximately 25 feet in length. Soil encountered during the excavation appeared to be undisturbed and consisted of native material (silts and clays). Backfill material, distribution lines or any evidence that would indicate a possible tank and/or vault (i.e., fragments of concrete or steel) were not identified. Test Pit 2 was advanced to a depth of 7 feet bgs, was excavated in a east/west direction and was approximately 10 feet in length. No evidence was found that would indicate a tank or vault presently or previously existed in this area.

Conclusions

Based upon the findings of this report, the following conclusions are provided:

- The geophysical survey indicated a magnetic anomaly in the area south of the equipment shed.
- The two test pits advanced in the location of the magnetic anomaly showed no evidence of a tank or vault presently or previously being located in this area.
- Based on the results of the geophysical survey, a process tank or vault is not located in the area of the former manual screen wash area.

- The source of the magnetic anomaly found in the former manual screen wash area is unknown.

Recommendations

Based on the above findings, Delta recommends that no additional investigation is needed in the former manual screen wash area. As proposed in the Draft Remediation Workplan, dual phase vapor extraction will be performed in this area to remove volatile organic compounds from the subsurface.

Please contact us if you have any questions or comments regarding the items contained in this summary.

Sincerely,

DELTA ENVIRONMENTAL CONSULTANTS, INC.

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Project Manager

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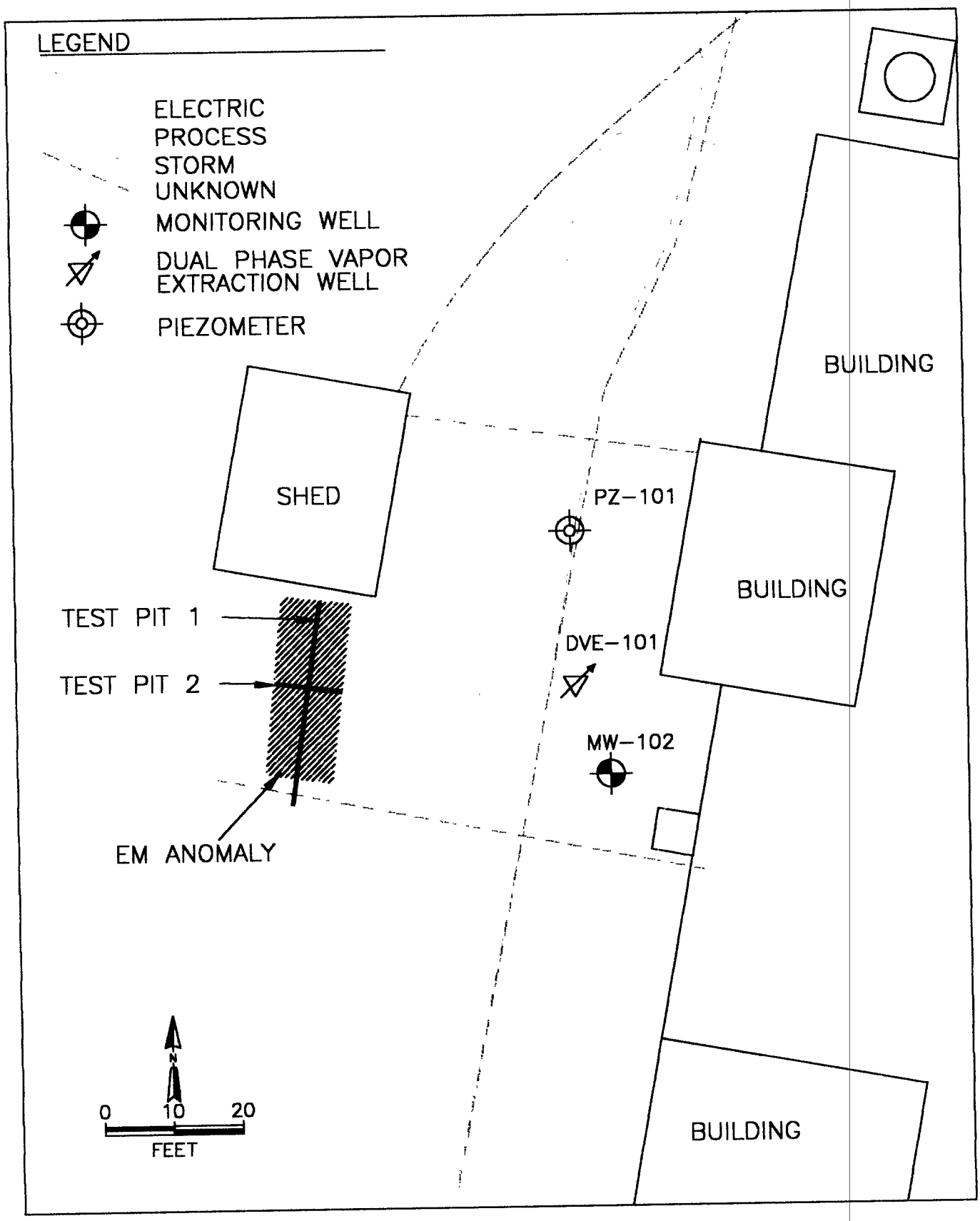

Delta Environmental Consultants, Inc.	TITLE: MAGNETIC ANOMALIES AND TEST PIT LOCATIONS CHAMPION PRODUCTS COMPANY PERRY, NEW YORK	DWN: HLW	DES.:	PROJECT NO.: S098-009
		CHKD:	APPD:	FIGURE NO.: 1
		DATE: 7/28/99	REV.:	