OPERATION, MAINTENANCE & MONITORING PLAN AND SITE MANUAL

40 Marbledale Road
Tuckahoe, Westchester County, NY
NYSDEC Site #V00237-3

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1.0 INTRODUCTION

1.1 DESCRIPTION OF PROJECT

On May 9, 2000, Kings Electronics Co., Inc, now Weissman Holdings, Inc. (Kings), entered into a Voluntary Cleanup Agreement (VCA) with the New York State Department of Environmental Conservation (NYSDEC) pursuant to the Voluntary Cleanup Program (VCP). In accordance with the VCA, Kings agreed to investigate and remediate contamination resulting from former metal parts degreasing operations conducted at 40 Marbledale Road, Tuckahoe, Westchester County (the Site). The Site location is presented in Figure 1. A Site Plan is presented in Figure 2.

Site investigation done prior to the VCA revealed that groundwater within the shallow, unconfined water table aquifer in the vicinity of Kings' former manufacturing/degreasing operations area had been impacted by chlorinated volatile organic compounds (CVOCs), primarily trichloroethene (TCE). The source of this contamination, soil impacted by the former degreasing operations, was excavated and removed from the Site in April of 1999 prior to entering the VCP. To address the impacted groundwater a Revised On-Site Remedial Action Work Plan (RAWP) dated July 3, 2002 was approved by NYSDEC. As described in the RAWP, an Enhanced Reductive Dechlorination (ERD) process was selected as the cleanup remedy. Under this process, routine injections of molasses solutions were used to produce subsurface conditions promoting the breakdown of CVOC contaminants into innocuous compounds. The ERD remedial system began operation in January 2003. The Site specific cleanup goals for groundwater [i.e.; below NYSDEC's Division of Water Technical and Operational Guidance Series (TOGS) 1.1.1] were achieved in January 2008. All molasses injections ended in August 2008, beginning the post-remediation groundwater monitoring period.

Although impacted soil was removed prior to the VCA (and the area was back-filled with compacted gravel and topped with concrete), additional soil sampling occurred after the VCA was executed. Some residual soil contamination was discovered, all beneath building foundations and/or asphalt/concrete cover. As discussed more fully herein, this residual contamination is addressed in a Deed Restriction established for the Site (a copy can be found within the "Deed Restriction" tab of this Manual). The Deed Restriction will subject activities disturbing either subsurface soil or the existing building foundation/asphalt cover to a NYSDEC-approved Soil Management Plan and a Health and Safety Plan.

In addition, in order to address possible soil vapor intrusion (SVI) at the Site, Kings agreed to install a sub-slab depressurization (SSD) system in the Site's current storage facility, in lieu of conducting a full scale SVI investigation. The SSD system installation began in 2007 and continued during the construction of the current storage facility, becoming fully operative in March of 2008.

It is important to note that the investigative and remedial activity at the Site has been governed by NYSDEC's VCP. While the VCP was replaced by the Brownfields Cleanup Program (BCP), Kings chose not to transition into the BCP. Accordingly, activities at the Site have been, and will continue to be, governed by the VCP.

In addition, Kings no longer owns the Site, as it was sold to Marbledale Road LLC (Marbledale) in 2006 (with NYSDEC's approval) and was converted to a self-storage facility operated by Storage Deluxe. In connection with some of the OM&M activities covered in this Manual, Kings will rely on a Post Closing Agreement dated January 19, 2006 whereby Marbledale agreed:

- To provide access to Kings for the completion of its obligations under the VCA;
- To use commercially reasonable efforts not to take any action at the Site which under the VCA would require NYSDEC's permission without obtaining such permission;
- Not to perform any activity that would cause Kings to be in violation of the provisions of the VCA; and
- To execute a deed restriction for recording in the Office of the Westchester County Clerk that is "reasonable and consistent with the language of the VCA."

1.2 PURPOSE OF THIS OM&M MANUAL

This Manual sets forth the post-remediation Operation, Maintenance and Monitoring (OM&M) procedures established for the Site. It is meant to be a stand alone document that can be implemented by individuals unfamiliar with the site and should be kept in a readily accessible area in Storage Deluxe's rental office, or other accessible area designated by the Site owner. The Manual includes:

- A history of the Site and the VCA investigations and remedial action;
- An Institutional and Engineering Control Plan, which incorporates the Site's Soil Management Plan and Health and Safety Plan;
- A post-remediation groundwater monitoring plan and operations and maintenance plan for the groundwater monitoring and injection system contained in the attached "*Post Remedial Operation, Maintenance and Monitoring Plan--On-Site Groundwater Remediation System"* prepared by ARCADIS of New York, Inc.(ARCADIS), dated November 9, 2009, (the ARCADIS OM&M Plan);
- An operations and management plan for the Site's SSD system entitled "*OM&M/Site Management Plan for Sub Slab Depressurization System Installed at Storage Deluxe"* prepared by Environmental Management, Ltd. (EML) dated May 16, 2008 and approved by NYSDEC and NYSDOH on August 6, 2008, (the SSD OM&M Plan); and
- An Emergency Contingency Plan.

The provisions of this Manual may be modified to reflect changes in the Site's operations, maintenance and monitoring activities, subject to NYSDEC approval.

1.3 SPECIAL SITE-SPECIFIC SAFETY WARNINGS

A Deed Restriction has been established for the Site and is identified in this Manual within a separate tab. It includes the following Site constraints:

- The Site may be used only for commercial purposes, other than as a daycare, childcare or medical facility, unless otherwise authorized by NYSDEC.

- Although groundwater has been successfully remediated as required by NYSDEC, groundwater underlying the property may not be used for any purpose unless permitted by NYSDEC.

- Activities disturbing the Site's subsurface soil and existing asphalt cover and building foundations (Soil Cover) are governed by the attached Soil Management Plan and Health and Safety Plan. These restrictions exist because low levels of contamination remain in soil underlying covered portions of the Site. (See Figure 3 for a Site map showing locations of remaining known residual soil contamination and Figure 4 identifying existing Soil Cover within the surface area of the property).

- The SSD system installed on-site, which mitigates potential soil vapor intrusion, should continue to be operated unless NYSDEC determines that it may be discontinued.

In addition to the above Deed Restriction items, the following matters should be noted:

- The groundwater remediation and monitoring well system is installed beneath building concrete slabs and exterior paved surfaces, and will be kept operable during the post-remediation monitoring period (as described in the ARCADIS OM&M Plan). Care should be taken not to disturb or open the flush mounted sealed access points. An As Built Remedial System Layout which shows the location of the groundwater system components is included within a separate tab in the Groundwater section of this Manual. Only qualified personnel should access the system components for post remedial activities such as groundwater sampling, molasses injection or system maintenance**.**

- The SSD system installed on-site includes six independent sub-systems each with an external wall mounted exhaust fan and adjacent electrical shutoff switch. As-builts for the SSD Systems are included within a separate tab in the SSD section of this Manual. All fans and electrical shutoffs are outside the buildings. The fans are enclosed and have no accessible moving parts. All fans should remain "on" at all times except in the event of obvious failure – overheating, grinding, and fire – when electrical power must be shut off. ***If smoke or fire, call 911***. Repair should be undertaken only by the installer (Mitigation Tech) or a licensed electrician. Contact information for the installer is posted at each manometer. The internal components (i.e.; components within the interior of the building) consist of an overhead PVC pipe network, and down drop PVC pipes sealed within metal chases inside individual storage units. The only accessible components are vacuum gauges (manometers) which indicate whether the system is maintaining adequate vacuum. The manometers should be read at least on a weekly basis by the Site operator.

A copy of the SSD *Owner's Manual and Information Packet for Mitigation Systems at Storage Deluxe* is included within a separate tab in the SSD section of this Manual.

1.4 RECORDS MANAGEMENT

1.4.1 OM&M Needs Summary

OM&M at the Site consists of the following, all of which are discussed in more detail later in this Manual:

For Groundwater:

- Implementing an on-site groundwater monitoring plan (which includes at least eight (8) quarters of groundwater sampling) to determine if there is a rebound of TCE from the source area resulting from deactivation of the ERD system;
- Evaluating monitoring data on a quarterly basis during the post-remedial monitoring period (i.e.; until groundwater monitoring is no longer required) and implementing appropriate post remedial activity if there is a rebound of TCE from the source area; and
- Maintaining the on-site monitoring and injection wells in operational order during the post-remedial monitoring period, including annual monitoring well and injection well integrity assessments.

For Soil:

- Subsurface soil and Soil Cover disturbance activities will be subject to both the approved Site-specific Soil Management Plan and the Health and Safety Plan, unless NYSDEC approves project specific plans.

For Potential Soil Vapor:

- Operating and maintaining the on-site SSD system pursuant to the SSD OM&M Plan previously approved by NYSDEC and the New York Department of Health (NYSDOH), or any approved modification thereof.

For Institutional and/or Engineering Controls:

- The Site owner will record the NYSDEC approved Deed Restriction for the Site with the Office of Westchester County Clerk. This Deed Restriction limits the use and development of the property, as well as restricts the use of groundwater and/or disturbance of subsurface soil, as discussed in more detail below.
- The Site owner or operator will submit an annual institutional control/engineering control (IC/EC) certification that there has been no violation of the Site's recorded Deed Restriction, until the State no longer requires such certification.

1.4.2 OM&M Needs Summary List of Official Records and References

See Section 13 below, *Electronic Copies of Official Records and References*, for a summary list of official records and references. Inspection and maintenance forms are discussed in Section 11 below and blank copies of all such forms are attached in the Blank Forms section of this Manual.

2.0 SITE DESCRIPTION

The Site consists of storage buildings, three paved ingress/egress parking areas, an alleyway, and paved loading/unloading dock areas. The property occupies approximately 1.8 acres and is located in a mixed area consisting of light industrial, commercial, and residential uses.

2.1 HISTORY

Prior to the development of the former Kings facility, the area operated as a marble quarry until the 1900's. Following cessation of quarrying operations, the quarried areas were backfilled with non-native material (e.g., soil, bricks, marble fragments) to the existing elevation.

The northern portion of the Site was developed and operated as an icehouse in the mid 1900's. Wood planks and cork that served as floor insulation have been found in some areas beneath the existing concrete floor of the original building. The remainder of the property was developed prior to 1900 by T.D. Wadelton & Sons (woodwork and manufacturer). Sometime between 1931 and 1952, a portion of the Site was redeveloped by the O.D. Chemical Corporation.

The former Kings facility became active after 1951, and manufacturing operations included wastewater pretreatment, electroplating, degreasing, machining, assembly and other production processes. Manufacturing operations ceased in 1998 and related process equipment, materials, and wastes were dismantled and/or removed that year.

As discussed above, in 2006, Kings sold the Site to Marbledale, which redeveloped the former Kings facility to the self-storage facility operated by Storage Deluxe today.

2.2 HYDROGEOLOGY

As set forth in Section 2.2.2 of the ARCADIS OM&M Plan, groundwater beneath the Site occurs in both the unconsolidated sand and silt, and bedrock. Depth to groundwater in the unconsolidated unit is between 9 and 12 feet bgs. Groundwater flow in the unconsolidated unit is generally to the south, southwest and follows topography, which slopes gently to the south. Hydraulic conductivity values in the unconsolidated unit average approximately 10 feet per day (ft/day). Horizontal seepage velocities for groundwater present in the unconsolidated sediments average approximately 0.8 ft/day.

An artesian bedrock production well (no longer in use) exists onsite and has demonstrated an upward gradient in the bedrock groundwater. The total depth of this well is reportedly 550 feet below grade. Based on a downhole television inspection of the open borehole (66' to 550' below grade), the bedrock formation is believed to be either Manhattan Schist or Fordham Gneiss.

Groundwater beneath the Site and the surrounding area is not used as a potable drinking water source.

Well logs are included in Appendix B to the ARCADIS OM&M Plan, which is included in this Manual.

3.0 SITE INVESTIGATION AND REMEDIAL ACTION

Groundwater, soil and soil vapor investigation activities were conducted at the Site. Groundwater investigation led to in-situ groundwater bioremediation action using an enhanced reductive dechlorination (ERD) process to treat impacted groundwater. The remaining environmental media (soil and soil vapor) have been and will continue to be addressed by institutional and/or engineering controls, as discussed in this Manual.

3.1 DESCRIPTION OF GROUNDWATER REMEDIAL ACTION

A complete description of the groundwater remediation is set forth in Section 3 of the ARCADIS OM&M Plan, entitled "Description of On-Site Remedial Action for CVOC Impacted Groundwater". It includes the following items:

- ERD process
- Injection well network
- Groundwater monitoring well network
- Baseline monitoring
- History of carbohydrate (molasses) injections
- History of on-site and off-site groundwater monitoring
- Meeting the goals of the groundwater remedial action

The specific groundwater cleanup goals established for the Site (i.e., below NYSDEC TOGS 1.1.1) were achieved in January 2008. All ERD injections ended in August 2008, beginning the post-remediation groundwater monitoring period. Pursuant to Section 6.1.1 below and the ARCADIS OM&M Plan, on-site injection and monitoring wells will continue to be maintained in operational order during the post-remedial monitoring period.

3.2 DESCRIPTION OF SOIL ACTIVITIES

Prior to entering the VCP, Kings voluntarily excavated the former degreaser area to remove the Site's source contamination. After acceptance into the VCP, additional soil investigation activities were conducted by Geovation Engineering, P.C. (Geovation) as follows:

- In January 2001, soil samples were collected from a "Test Pit" just north of the degreaser soil removal site. See "Results of Additional Soil Sampling Activities," Geovation, March 30, 2001 (on enclosed CD).

- In March 2001, additional soil samples were collected during the boring for installation of groundwater monitoring wells MW-10/11/12 south of the former degreaser location. See "Installation of 3 Additional Ground Water Monitoring Wells," Geovation, May 2001 (on enclosed CD).

- In November 2001, soil samples were collected from locations within the sidewalls of the excavation at the degreaser soil removal site. See "Additional Site Investigation Activities," Geovation, February 2002 (on enclosed CD).

- In April 2002, samples of silt layer soil were collected from within the sidewalls of the excavation at the degreaser soil removal site. See "Additional Silt Layer Sampling and Silt Layer Summary Report," Geovation, July 2002 (on enclosed CD).

- In August 2004, below slab soil samples were collected to identify future locations for possible soil vapor sampling. See "On-Site Sub-Slab Soil Sampling and Analysis Investigation Report," EML-Geovation, November 2004 (on enclosed CD).

- From March to July 2005 a series of soil investigations were conducted below and adjacent to the basement of the southern building (Storage Deluxe Building #7). See April, May and August 2005 Geovation Soil Sampling Reports (on enclosed CD).

Figure 3 (attached) identifies the locations of remaining residual contamination (above the 6 NYCRR Part 375 Unrestricted Use Soil Cleanup Objectives) discovered during the above soil sampling activities. All of this remaining residual soil contamination was located beneath either a building foundation or asphalt/concrete cover and was below the Part 375 Restricted Use Commercial Soil Cleanup Objectives for the Protection of Public Health (as noted, the Site's use is restricted commercial). As discussed in Section 4 below, NYSDEC agreed to allow Kings to address the remaining impacted soil through the use of engineering and institutional controls.

3.3 DESCRIPTION OF SOIL VAPOR ACTIVITIES

In September 2004, at NYSDOH's request, an investigation into possible on-site soil vapor intrusion began. Preliminary sub-slab soil vapor and indoor ambient air sampling was conducted at specific locations within the Site buildings in order to evaluate the potential for soil vapor intrusion into the buildings. (See October 2004 Indoor Air Sampling & Analysis Report, EML, on enclosed CD). Instead of continuing with a full-scale on-site SVI investigation, Kings agreed to install an on-site SSD system.

On August 3, 2005, NYSDEC approved a Mitigation System Work Plan for the installation of the SSD system at the Site. On January 19, 2006, the property was sold to Marbledale, which undertook extensive interior demolition, renovation and conversion of the property for self-storage use. In coordination with Marbledale's renovation activities, Kings' contractor, Mitigation Tech, installed the SSD systems in stages (as interior spaces were completed and utility services restored) and made necessary field modifications. Installation was substantially completed in late November 2007. Following a short evaluation period that ended with the March 2008 replacement of a failed fan impeller unit, the systems were deemed fully operative by Kings. Copies of certified SSD System As-Builts are included in this Manual within a separate tab in the Manual's SSD Section. As discussed in Section 6.1.2 below, the operation and maintenance of the SSD system is governed by the previously approved SSD OM&M Plan, a copy of which is included in this Manual.

4.0 INSTITUTIONAL AND ENGINEERING CONTROL (IC/EC) PLAN

4.1 GROUNDWATER

Groundwater underlying the Site shall not be used for any purpose without NYSDEC's permission. A Deed Restriction prohibiting such groundwater use has been established at this Site.

4.2 SOIL

Subsurface soil and existing Soil Cover (i.e., building foundation and asphalt cover) at the Site shall not be disturbed except in accordance with the Site's Soil Management Plan and Health and Safety Plans, or any amended or project specific plans approved by NYSDEC. This control is included in the Deed Restriction. Site Figure 3 identifies locations of known residual soil contamination and Figure 4 identifies the existing Soil Cover.

4.3 SOIL VAPOR

- The on-site SSD System shall continue to be operated by the Site's owner or operator until such time as NYSDEC determines it may be discontinued. The Deed Restriction so stipulates.

- The operation and maintenance of the SSD system shall be governed by the On-Site SSD OM&M Plan approved by NYSDEC and NYSDOH (the State) on August 6, 2008, or any State approved amendment thereto.

4.4 SITE USE

The Site can be used only for commercial purposes, other than as a daycare, childcare or medical facility, consistent with the permitted zoning classification of the Site, unless otherwise authorized by NYSDEC. The Deed Restriction so stipulates.

4.5 ANNUAL IC/EC CERTIFICATION

The Site's owner or operator will submit an annual certification (until no longer required by NYSDEC) that the terms of the Site's recorded Deed Restriction have not been violated.

5.0 GROUNDWATER MONITORING PLAN

The post-remedial groundwater sampling and monitoring plan for the Site is set forth in the ARCADIS OM&M Plan which is included within a separate tab in the Groundwater section of this Manual.

6.0 SITE OPERATIONS AND MAINTENANCE PLAN

Operations and/or maintenance activities covered in this Manual relate to the on-site groundwater remediation and monitoring well system and the on-site SSD system.

6.1 MAINTENANCE ACTIVITIES

6.1.1 Groundwater Remediation and Monitoring System

The on-site injection wells and monitoring wells will be maintained in operational order until groundwater monitoring is no longer required by NYSDEC. All maintenance and operations activities for the groundwater remediation and monitoring system are governed by the ARCADIS OM&M Plan (included within a separate tab in this Manual).

6.1.2 On-Site Sub-Slab Depressurization System

The on-site SSD System will be operated and maintained until NYSDEC allows the SSD System to be discontinued. The operation and maintenance of the SSD System is governed by the On-Site SSD OM&M Plan (included within a separate tab in this Manual). However, Kings' obligations under the SSD OM&M Plan will be turned over to the Site's owner or operator in accordance with the Deed Restriction.

Please note that the SSD *Owners Manual and Information Packet* (previously provided to Storage Deluxe and included within a separate tab in this Manual) summarizes the current responsibilities of Kings and the Site owner/operator with respect to the SSD system and contains manufacturers' instructions and catalog-cuts for the system and its components.

6.2 INSPECTIONS AND MAINTENANCE

6.2.1 Operating Records

Copies of completed forms relating to annual inspections and maintenance activities, as well as any Quarterly Interim Monitoring Reports, shall be included in the Site's Annual Report. A copy of each Annual Report that is submitted shall be maintained and filed in the Logs and Reports Binder accompanying this Manual. Copies of blank inspection forms are contained in the Blank Forms Section – last tab of this Manual.

6.2.2 Weekly Checklist

The Site owner or operator should read each of the six SSD manometers (gauges) at least weekly and complete an entry on the SSD Inspection Log Form. This log form is contained within the Weekly Log Section of the Logs and Reports Binder accompanying this Manual. Mitigation Tech should be notified (at 1-800-637-9228) if there is a change in a manometer reading.

6.2.3 Monthly Checklist

The Site owner or operator should inspect visible SSD components on a monthly basis for changes in appearance or unusual noise and complete an entry on the SSD Inspection

Log Form. This log form is contained within the Monthly Log Section of the Logs and Reports Binder accompanying this Manual. Mitigation Tech should be notified (at 1-800-637-9228) of any changes or unusual noise.

6.2.4 Annual Check List

The following activities will be conducted on an annual basis:

- Until groundwater monitoring is no longer required, Kings or its agent will conduct annual well integrity assessments for the injection wells (IW-5, IW-6, MW-HP-8S, MW-1, MW-11, MW-10, MW-12, MW-2, IW-8, IW-9, IW-10, IW-11, GP-106R2, IW-1R, IW-2, IW-3, IW-4, IW-12, IW-13, IW-14, IW-15R, MW-7S & IW-16) and for monitoring wells MW- 6S, MW-9S, MW-9D, PTW-2, GP-104R, GP103R and MW-13R, and complete a Monitoring Well Field Inspection Log for each well (see the Blank Forms Section – last tab). Well repairs should be carried out as necessary and documented in the assessment form.

- Kings or the Site owner or operator will conduct annual SSD routine maintenance and inspection and complete the Annual Inspection and Routine Maintenance Form for each of the six SSD sub-systems, and make any necessary repairs or adjustments and document such repairs/adjustments in the inspection form (see Blank Forms Section - last tab) until, with State approval, the operations and maintenance of the SSD systems are turned over to the Site owner or operator, or the SSD system is turned off, whichever is earlier.

6.2.5 Other Inspections and/or Maintenance

In addition to the above routine/scheduled inspections or maintenance activities, other inspections and/or maintenance activity will be performed by Kings or the Site owner or operator if there is:

- Any structural damage to or mechanical failure of the SSD System;;
- Any damage to a Monitoring or Injection Well; or
- Flooding or a severe weather event.

An *Incident Inspection Form* should be completed for these non-routine inspection/maintenance events requiring corrective action (see Blank Forms Section).

6.3 DISPOSAL OF WASTE

The only waste product generated on-site as a result of OM&M activities is monitoring well purge water. This wastewater will be accumulated within a designated 55-gallon plastic drum and stored on-site. A permitted solid waste transporter (with a current 6 NYCRR Part 364 permit) will transfer the waste purge water to a vacuum truck used by the transporter for delivery offsite.

7.0 REPORTS/CERTIFICATIONS

7.1 QUARTERLY REPORTS

Kings will prepare and submit a quarterly Interim OM&M Report to NYSDEC, while on-site quarterly groundwater monitoring is required by NYSDEC, which will include:

(i) Results of any quarterly groundwater monitoring presented on summary data tables and on a Site map with sampling locations and any corresponding significant analytical values.

(ii) Any comments, conclusions and recommendations based on an evaluation of groundwater monitoring results, as well as details of any post-remedial groundwater activities if there is a rebound of TCE from the Site's source area.

(iii) A description of any breakdowns and/or repairs in connection with the on-site SSD system or the injection or groundwater monitoring well system, with Incident Inspection Forms attached, and any comments, conclusions or recommendations based on resolution of such problems.

Quarters shall end on the last day of the following months: October, January, April and July. Any required Interim OM&M Reports shall be submitted within 45 days of the end of the specified quarters of October, January and April.

7.2 ANNUAL REPORT AND CERTIFICATIONS

An Annual Report shall be submitted by Kings to NYSDEC within 90 days of the end of the July quarter if there is a July groundwater sampling event, or within 90 days of the last on-site groundwater monitoring event if it occurs during a month other than July. The Annual Report shall contain the following items, where applicable:

(i) A location map

(ii) A site map

(iii) Any quarterly groundwater or bi-annual monitoring data, including test methods, analytical reports, summary data tables and a Site map with sampling locations and any corresponding significant analytical values.

(iv) A description of the annual inspections of the injection and monitoring wells with Monitoring Well Field Inspection Logs attached, as well a description of any damage and/or repairs in connection with the injection or groundwater monitoring well system.

(v) Comments, conclusions and recommendations based on an evaluation of groundwater monitoring results, injection and monitoring well integrity, and details of any post-remedial activities (if there is a rebound of TCE from the Site's source area). This information shall be prepared by ARCADIS (or other qualified hydrogeological firm).

(vi) A description of the annual inspections of the on-site SSD System with inspection forms attached, as well as a description of any breakdowns, repairs, maintenance and/or sampling in connection with the on-site SSD System.

(vii) The annual certification for the on-site SSD System as required by the SSD OM&M Plan.

(viii) An IC/EC Certification prepared by the Site owner that the terms of the Site's recorded Deed Restriction have not been violated.

7.3 OTHER REPORTS OR CERTIFICATIONS

Kings or its agents will submit additional report(s) to NYSDEC where decisions regarding changes to approved OM&M activities need to be made in between quarterly or annual reporting. After Kings submits its final Annual Report, a certification by the Site owner or operator that the terms of the Deed Restriction have not been violated will be submitted annually until the State no longer requires such certification.

8.0 CITIZEN PARTICIPATION

There are no citizen participation requirements or obligations in connection with any OM&M activities at the Site. See VCP Guide Section 5.

9.0 PERSONNEL- POST REMEDIAL OPERATIONS

The following organizational chart reflects a relative chain of command for Site activities during the post-remedial OM&M period..

All personnel below are subject to the Site HASP requirements (see Section 10 of this Manual). Relevant Material Safety Data Sheets and other health and safety documents are included in the Health and Safety Plans tabbed section of this Manual.

ENVIRONMENTAL MANAGEMENT, LTD. (EML)	
As environmental consultant to Kings, EML is responsible for overall supervision and Site management including: coordinating Site activities, conducting inspections, accompanying contractors, routine reporting, and acting as primary contact between Kings and the State (i.e.; both NYSDEC and NYSDOH project managers).	
Key Personnel	**Title**
Donald Wanamaker	President
Bruce M. Munson	Project Manager
Melinda Horan	Certified Industrial Hygienist
ARCADIS OF NEW YORK, INC. (ARCADIS)	
As a contractor to Kings, ARCADIS is responsible for all post-remedial groundwater monitoring, reactivation of ERD system or any other groundwater activity including: reporting, well injection and well maintenance. According to the ARCADIS Health and Safety Plan, all Site personnel receive applicable training pursuant to OSHA hazardous waste operations and emergency response (HAZWOPER) requirements (29 CFR 1910.120).	
Key Personnel	**Title**
Moh Mohuiddin, P.E.	Project Manager
Eric Rodriguez	Project Scientist
Power Liang	Engineer
GEOVATION ENGINEERING, P.C. (Geovation)	
As a contractor to Kings, Geovation was responsible for soil investigation activities, as well as SSD system as builts. Geovation's principals are professional engineers and/or certified professional geologists (CPG). According to Geovation's Health and Safety Plan, all Site personnel receive applicable training pursuant to OSHA HAZWOPER requirements.	
Key Personnel	**Title**
Robert Zimmer, P.E., C.P.G.	Project Manager
MITIGATION TECH (MT)	
As a contractor to Kings, MT is responsible for the continued operation, maintenance and effectiveness of the SSD system.	
Key Personnel	**Title**
Nicholas Mouganis	President
STORAGE DELUXE (SD)	
Storage Deluxe is the current Site operator and, in addition to its own actions under this OM&M Plan and Site Manual, should be notified for Site access in advance of planned OM&M activities.	
Key Personnel	**Title**
Steven Novenstein	President
The following State personnel currently oversee the Site.	
NYS DEPARTMENT OF ENVIRONMENTAL CONSERVATION (NYS DEC)	
Nicole Bonsteel, P.E.	518-402-9814
NYS DEPARTMENT OF HEALTH (NYS DOH)	
Carl Obermeyer	845-794-3165

10.0 HEALTH AND SAFETY PLAN

There are two relevant Health and Safety Plans for the Site, both included in the HASP tabbed section of this manual. One applies to all personnel involved in on-site groundwater activities (see the HASP-Groundwater prepared by ARCADIS). The other HASP (Non-Groundwater) applies to all personnel inspecting and/or repairing the SSD system and/or any person (including, but not limited to, facility personnel, contractors, utility workers and emergency responders) engaged in subsoil or soil cover disturbance activities. When taken with the Site's Soil Management Plan (included within a separate tab in this Manual), these HASPs include measures to assure protection from exposure to any remaining Site contaminants.

11.0 RECORDS AND FORMS

11.1 MONITORING FORMS

Blank copies of the following forms relating to groundwater sampling/monitoring are included in the last section of this Manual within the Blank Forms tab:

- Low-Flow Groundwater Sampling Log
- Chain of Custody & Laboratory Analysis Request Form

11.2 OPERATING AND INSPECTION FORMS

Blank copies of the following inspection forms are provided in the last section of this Manual within the Blank Forms tab:

- IC/EC Certification
- Annual Inspection and Routine Maintenance Form - SSD Systems
- Storage Deluxe – Log Form for SSD System Inspections
- Visual Inspection Form – SSD Systems
- Monitoring Well Field Inspection Log
- Incident Inspection Form

11.3 HEALTH AND SAFETY PLAN AND SOIL MANAGEMENT PLAN FORMS

Blank copies of the following forms are also provided in the last section of this Manual within the Blank Forms tab:

- Contractor Occupational Health and Safety Plan-HASP Review Form
- Acknowledgement That Access To Soil Management Plan Was Offered

12.0 EMERGENCY CONTINGENCY PLAN

12.1 EMERGENCY SPILL RESPONSE

Except for the preservatives used in groundwater sampling procedures, there are no OM&M activities currently being conducted or which are planned that involve the use of hazardous materials, hazardous substances or petroleum products. Preservatives (e.g., HCL for VOCs) are used in such small quantities that they would not require any emergency spill response.

12.2 FIRE/EXPLOSION

There are no activities currently being conducted or which are planned that involve the use of flammable materials or oxidizers.

There is a fire potential for SSD system fans to overheat. In case of smoke or fire from the fan housing unit, ***call 911 and report a potential electrical fire. Turn the fan off.***

12.3 PERSONAL INJURY

In the event of a serious personal injury during OM&M activities, call 911. The nearest hospital is Lawrence Hospital, 55 Palmer Avenue, Bronxville, NY (914-787-1000). See driving directions in Section 12.6 below.

12.4 TOXIC EXPOSURES

A SSD System operates at the Site to address potential soil vapor intrusion. Residual soil contamination is beneath building foundations or asphalt/concrete cover and below NYSDEC Restricted Use (Commercial) Soil Cleanup Guidelines for the protection of human health. A Soil Management Plan (SMP), a Site HASP and a Deed Restriction are in effect at this Site to prevent exposure.

Site subsurface soil contamination is at a low concentration. Acute hazards due to CVOC exposure no longer exists. In order to protect Site workers (during subsurface soil disturbance activities) from potential chronic hazards, due to low level exposures from handling environmental media, the SMP and Site HASP have been devised. Since trichloroethylene (TCE) quickly evaporates from surface water, any post-remedial groundwater activity that brings groundwater to the surface must be conducted in conformance with the Site HASP. Although TCE evaporates less easily from soil, because it sticks to soil particles (particularly silt or clay), provisions of the Site HASP still apply.

Except for the small quantities of preservatives used in groundwater sampling procedures and gases used to calibrate field instruments, there are no OM&M activities currently being conducted or which are planned that involve the use of hazardous materials, hazardous substances or petroleum products. Preservatives (e.g., HCL for VOCs) and calibration gases are used in small quantities and their management still requires compliance with the Site HASP.

12.5 PUBLIC NOTIFICATION

Based on the OM&M activities at the Site, there are no anticipated situations arising that would require immediate notification to the public.

12.6 EMERGENCY TELEPHONE NUMBERS, MAP AND DIRECTIONS TO NEAREST HEALTH FACILITY

Emergency Contact	Phone Numbers
Local Police	911 or 914.961.4800
Local Ambulance	911 or 914.723.2003
Local Fire Department	911 or 914.793.6402
Local Hospital – Lawrence Hospital	914.787.1000

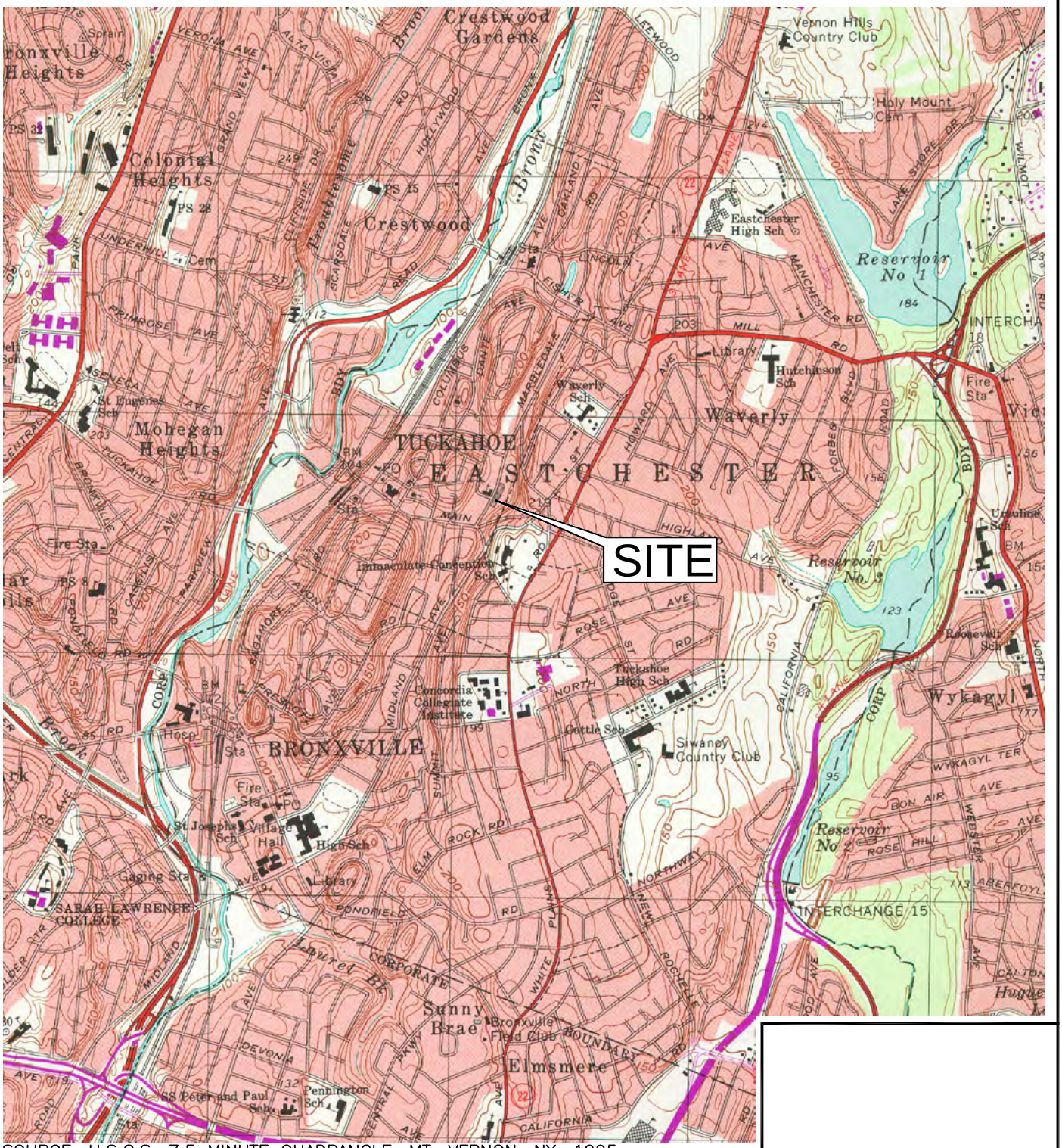
DIRECTIONS TO LAWRENCE HOSPITAL
55 Palmer Avenue, Bronxville, NY 10708, (914) 787-1000

- **SOUTHWEST** on Marbledale Road toward Marble Place (approximately 0.1 mile)
- **LEFT** onto Winter Hill Road (approximately 0.1 mile)
- **RIGHT** onto Midland Avenue (approximately 1 mile)
- **RIGHT** onto Pondfield Road (approximately 0.5 mile)
- Enter next roundabout and take 2nd exit onto Palmer Avenue (approximately 0.1 mile)

13.0 ELECTRONIC COPIES OF OFFICIAL RECORDS AND REFERENCES

See attached CD for the following documents:

- Additional Silt Layer Sampling Report, Geovation, July 2002
- Additional Site Investigation Activities, Geovation, Feb 2002
- Additional Soil Sampling Report, Geovation, March 2001
- CHASP & SMP Revised, AKRF, Feb 2006
- Comprehensive On-Site SSD Report, EML, May 2008
- Draft Deed Restriction, Cohen & Perfetto, Jan 2006
- February 2006 GW Elevation Report, Geovation
- GW Contour Maps, Geovation, May 2008
- October 2004 Indoor Air Sampling & Analysis Report, EML
- On-Site Sub-Slab Soil Report, 11-16-04
- Preliminary Regional GW Characterization, Geovation, May 2002
- Revised On-Site RAWP, ARCADIS, July 2002
- Revised On-Site RAWP – Addendum, ARCADIS, Dec 2002
- September 2004 Additional Off-Site Investigation (GW), Geovation
- September 2004 Off-Site Soil-Gas Report, EML
- Site Sampling Location Map, Geovation, May 2008
- Sub-Slab Soil Report, Geovation, April 2005
- Sub-Slab Soil Report, Geovation, May 2005
- Sub-Slab Soil Report, Geovation, Aug 2005
- Summary of Investigative Findings, LB&G, June 2000
- UST Closure Report – 40 Marbledale Rd., Tuckahoe, AKRF, Oct 2006
- Voluntary Cleanup Agreement
- Well Installation – Soil Sampling Report, Geovation, May 2001



SOURCE: U.S.G.S. 7.5 MINUTE QUADRANGLE, MT. VERNON, NY, 1995

QUADRANGLE LOCATION

0 2000' 4000'

GRAPHIC SCALE

N

Professional Engineer's
MOH MOHIUDDIN

P.E.'s Number	State	Date Signed
074527	NY	12/19/08

ARCADIS

ARCADIS OF NEW YORK, INC.

FORMER KINGS ELECTRONICS SITE • TUCKAHOE, NEW YORK

OPERATIONS, MAINTENANCE AND MONITORING PLAN

SITE LOCATION

ENVIRONMENTAL

ARCADIS Project No.
NJ00423.0005.00001

Date
12/19/08

ARCADIS
RARITAN PLAZA III
105 FIELDCREST AVE, SUITE 305
EDISON, NJ 08837
TEL. 732.225.5061

1

CITY: EDISON DIV/GROUP: ENR1-1 DB: JG LD: ER PIC:MM PM: MM TM: PL LYR:ON=*;OFF=*REF*
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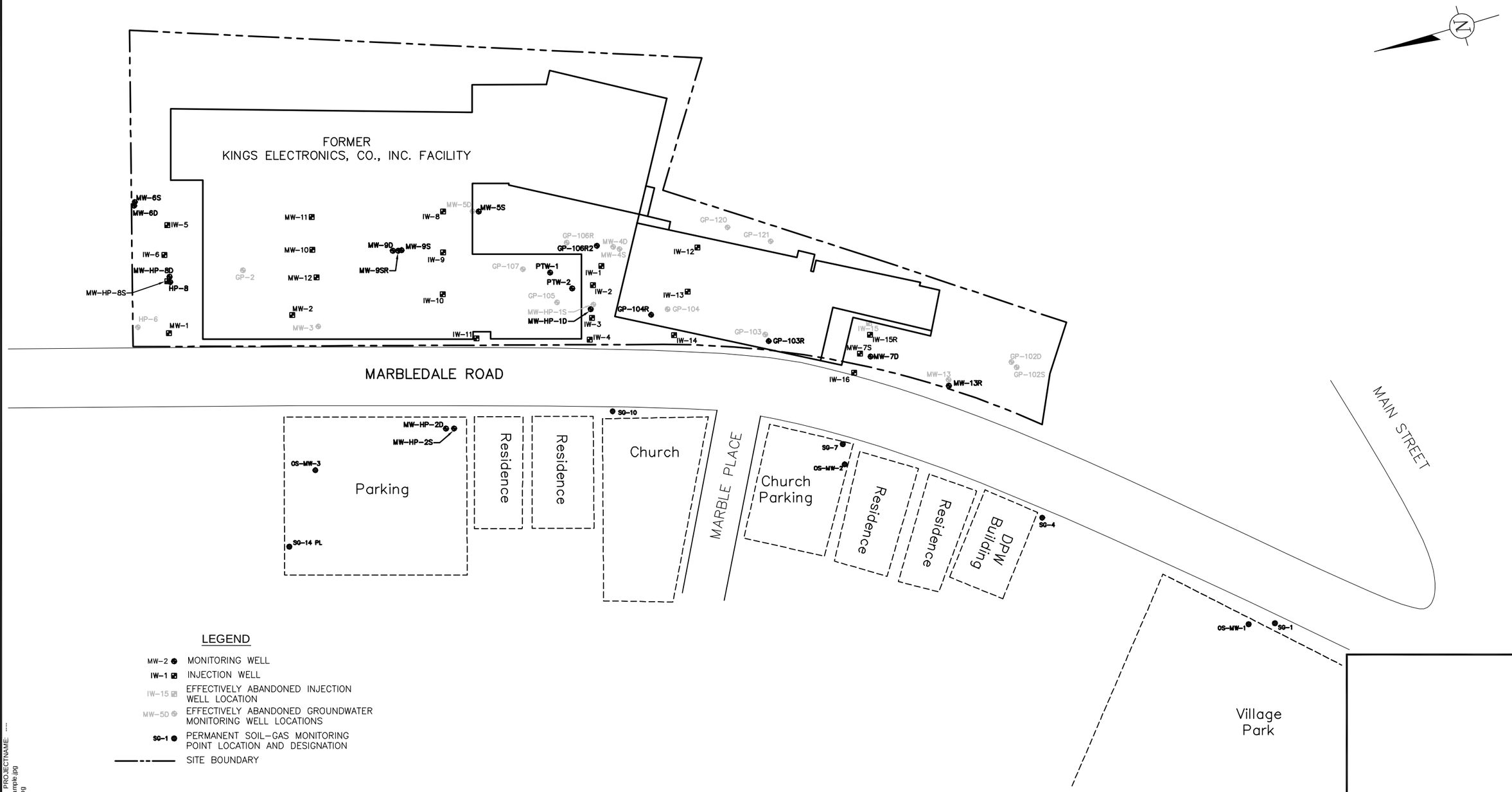
XREFS: IMAGES: PROJECTNAME: ---



LEGEND

- MW-2 ● MONITORING WELL
- IW-1 ■ INJECTION WELL
- IW-15 ▣ EFFECTIVELY ABANDONED INJECTION WELL LOCATION
- MW-5D ⊕ EFFECTIVELY ABANDONED GROUNDWATER MONITORING WELL LOCATIONS
- SG-1 ● PERMANENT SOIL–GAS MONITORING POINT LOCATION AND DESIGNATION
- SITE BOUNDARY

SOURCE(S): PARTIAL PLOT PLAN, KINGS ELECTRONICS, BY ROB IAROPOLI, L.S., MAY 23, 2001, AND JOSEPH M. PICARDI, P.L.S., SITE PLAN, JULY 23, 1978.

SITE BOUNDARY BASED ON SITE PLAN PROVIDED BY GABRIEL E. SENOR, P.C. TITLED "SURVEY OF LOT 2 AS SHOWN ON SUBDIVISION MAP PREPARED FOR KINGS ELECTRONICS CO., INC., DRAWING NO. S-1, SEPTEMBER 21, 2000".

Professional Engineer's
MOH MOHIUDDIN

P.E.'s Number	State	Date Signed
074527	NY	12/19/08

0 60' 120'
GRAPHIC SCALE

THIS BAR REPRESENTS ONE INCH ON THE ORIGINAL DRAWING: USE TO VERIFY FIGURE REPRODUCTION SCALE

No.	Date	Revisions	By	Ckd

THIS DRAWING IS THE PROPERTY OF THE ARCADIS ENTITY IDENTIFIED IN THE TITLE BLOCK AND MAY NOT BE REPRODUCED OR ALTERED IN WHOLE OR IN PART WITHOUT THE EXPRESS WRITTEN PERMISSION OF SAME.

Project Mgr. MM
Designed by ER
Drawn by JG
Checked by PL

ARCADIS
ARCADIS OF NEW YORK, INC.

FORMER KINGS ELECTRONICS SITE • TUCKAHOE, NEW YORK
OPERATIONS, MAINTENANCE AND MONITORING PLAN

SITE PLAN

ENVIRONMENTAL

ARCADIS Project No. NJ000423.0005.00001
Date 12/19/08

ARCADIS
RARITAN PLAZA III
105 FIELDCREST AVE, SUITE 305
EDISON, NJ 08837
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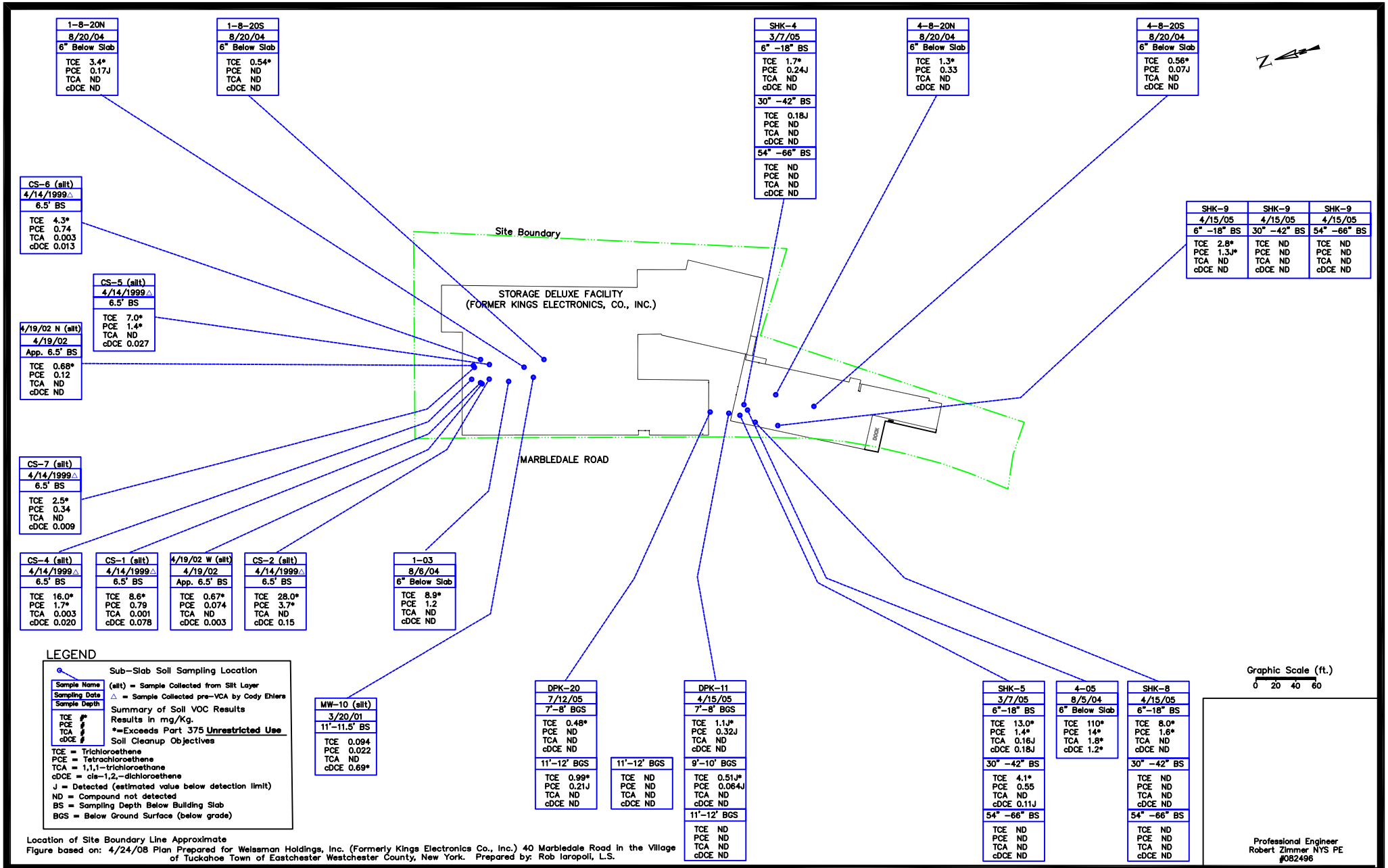
2



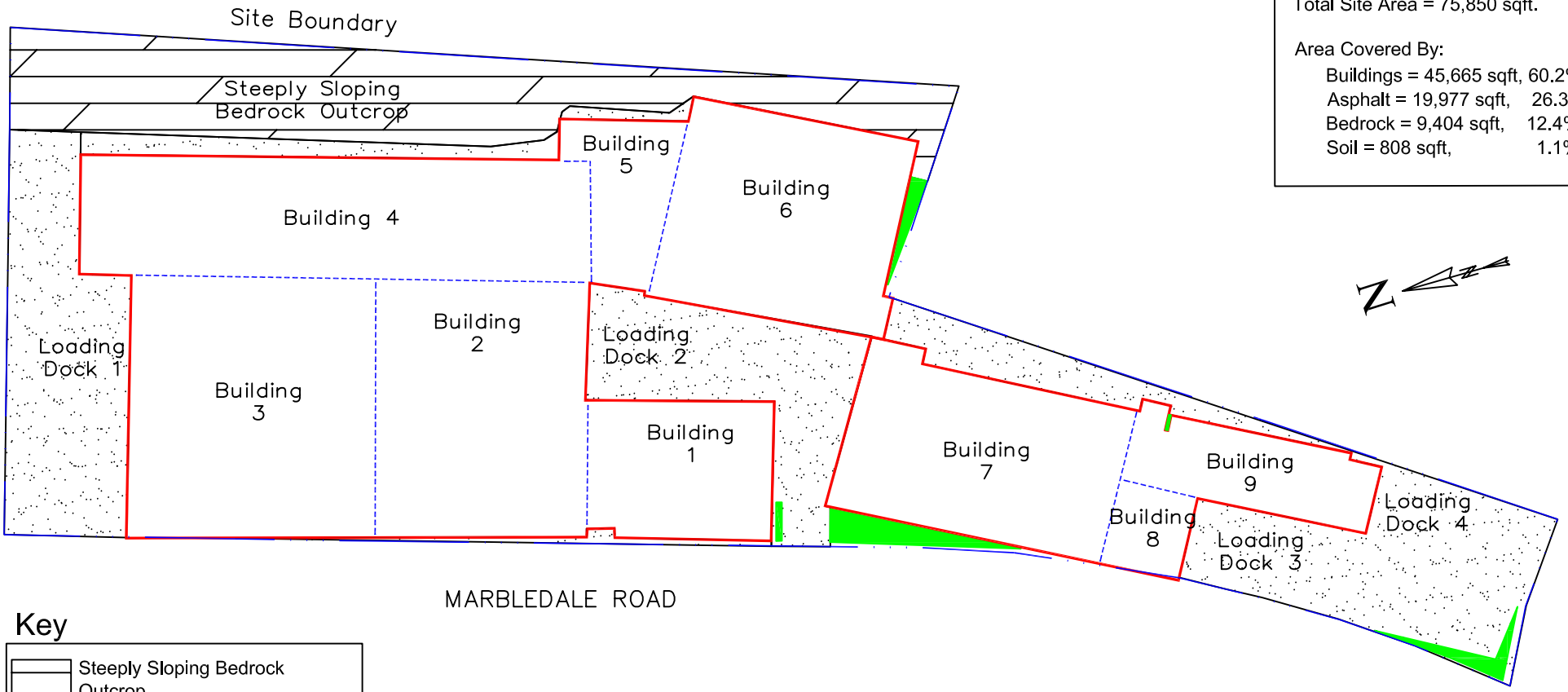
Location of Site Boundary Line Approximate
Figure based on: 4/24/08 Plan Prepared for Weissman Holdings, Inc. (Formerly Kings Electronics Co., Inc.) 40 Marbledale Road in the Village of Tuckahoe Town of Eastchester Westchester County, New York. Prepared by: Rob Iaropoli, L.S.

GEOVATION Engineering, P.C.
Innovative Solutions to Environmental Problems
468 Rte. 17A, P.O. Box 293
Florida, New York 10921

Location, Depth and Summary of VOC Soil Sampling Results Conducted Pursuant to Voluntary Cleanup Agreement and which Exceed 6NYCRR Part 375 Unrestricted Use SCOs.

Storage Deluxe Facility – Former Kings Electronics Co., Inc.
40 Marbledale Rd. Tuckahoe, NY

FIGURE
3



Area Calculations

Total Site Area = 75,850 sqft.

Area Covered By:

Buildings =	45,665 sqft,	60.2%
Asphalt =	19,977 sqft,	26.3%
Bedrock =	9,404 sqft,	12.4%
Soil =	808 sqft,	1.1%

Key

- Steeply Sloping Bedrock Outcrop
- Asphalt/Concrete
- Soil
- Outline of Storage Deluxe Facilty Buildings

Graphic Scale

0 50 100

feet

Location of site boundary line and site features approximate

Figure based on: 9/17/08 Survey Map Prepared by Arcadis reliant upon 9/21/2000 Survey of Lot 2 as shown on subdivision map prepared for Kings Electronics, Co., Inc., by Gabriel E. Senor, P.C., Drawing No. S-1,

Professional Engineer
Robert Zimmer NYS PE
#082496

GEOVATION
Engineering, P.C.
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Florida, New York 10921

Surface Area Showing Buildings, Asphalt/Concrete, Bedrock Outcrops and Soil. (Building Numbers also shown on Figure)
Storage Deluxe Facilty/Former Kings Electronics Co., Inc.
40 Marbledale Rd., Tuckahoe, NY

FIGURE
4