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May 5, 1998

Ms. Cheryl Ruth
Sr. Environmental Project Coordinator
Chautauqua County Dept. of Public Works
454 North Work Street
Falconer, New York 14733

Re: Edgewood Warehouse and Former Roblin Steel Sites
320 South Roberts Road, Dunkirk, New York
CHA Project No. 6801.07.04.

Dear Ms. Ruth:

Pursuant to your request, Clough, Harbour & Associates, LLP (CHA) has completed an evaluation of existing information concerning environmental conditions at the above referenced sites for the purpose of addressing the following issues:

- Scope and cost of Phase II Environmental Site Assessment (ESA) of the Edgewood Warehouse site to investigate potential environmental concerns identified in the Phase I ESA completed by CHA;

- Adequacy of previous environmental investigations completed at the Former Roblin Steel Site, and recommended scope of additional investigative measures to be employed to define potential environmental liabilities at the site;

- Potential remediation scenarios for the redevelopment of the Edgewood Warehouse/Former Roblin Steel Site; and

- Comparison of advantages/disadvantages of the Voluntary Cleanup and NYSDEC Brownfield Grant Programs relative to redevelopment of the project site.

The final issue listed above is a critical element of this project because the program selected for this project will dictate the scope of supplemental investigations to be performed, the extent of remediation to be completed, the project schedule, and the cost of the project. For this reason, the discussion concerning this issue is presented in the first section to follow.

1.0 COMPARISON OF REGULATORY PROGRAM OPTIONS

As discussed in our recent meeting with the New York State Department of Environmental Conservation (NYSDEC), the primary differences between the Voluntary Cleanup Program (VCP) and the Brownfield Grant Program are as follows:

- The scope of the investigation needed to pursue an agreement under the VCP need only be sufficient to characterize on-site conditions, while the Grant Program requires the investigation of both on-site and off-site contamination and the detailed evaluation of remedial alternatives;

- The VCP allows for cleanup levels reflective of the intended reuse and requires that only on-site contamination be addressed, while the Grant Program requires cleanup to pre-release conditions both on-site and off-site;

- Only municipalities are eligible for projects under the Grant Program, while both municipalities and private parties can participate in the VCP;

- Under the Grant Program, a municipality must have secured the title to the property, while a volunteer does not have to hold the title under the VCP;

- No funding is available under the VCP, however, up to 75% of the project costs can be funded under the Grant Program;

- The liability release available through the Grant Program is more comprehensive than that offered under the VCP, although both are transferable; and

- The typical schedule for completing an investigation and cleanup under the VCP is significantly shorter than that for a Grant Program project.

The decision of which regulatory program is most appropriate for the Edgewood/Roblin redevelopment project is a function of the magnitude and severity of the contamination associated with the site, the intended use of the site, the available budget for investigation and cleanup, and the required schedule for redevelopment. The NYSDEC has indicated that, in their opinion, the Former Roblin site is a good candidate for the VCP because existing data suggests that only mild contamination exists at the site, and that elaborate remediation measures are not likely to be necessary if the site is to be redeveloped for industrial use with deed restrictions prohibiting more intensive future uses (e.g., residential, institutional, etc.). However, the Department also agreed that supplemental investigations of the Former Roblin site are necessary to define the magnitude and extent of groundwater contamination at the site.

2.0 PHASE II ESA OF EDGEWOOD WAREHOUSE SITE

Based upon the results of the Phase I ESA completed at the Edgewood Warehouse Site in October, 1997 by CHA, the following recommendations for additional investigation were made:

- Collection and chemical analysis of soil, groundwater and sewer sediment/water samples to investigate potential impacts to these media;
- Testing of the active and inactive transformers present within the site buildings to determine the presence or absence of PCBs;
- Identification of all PCB-containing electrical equipment currently stored within the warehouse building;
- Disposal characterization of the solid substance observed within the three uncovered drums extant on the subject property; and
- Evaluation of the condition of asbestos containing materials (ACMs) identified within the warehouse building.

As per our recent discussions concerning this project, CHA recommends that the scope of the Phase II ESA of the Edgewood Warehouse site and that of the supplemental investigation of the Former Roblin Steel Site be integrated. This would enable the characterization of the entire redevelopment site in a cost effective manner. The combined Edgewood/Roblin site investigation program outlined in Section 4.0 of this letter incorporates all of the above listed recommendations.

3.0 PREVIOUS INVESTIGATIONS OF THE FORMER ROBLIN STEEL SITE

During the course of the Phase I ESA of the Edgewood Warehouse Site, CHA obtained and reviewed the following previous environmental reports for the Former Roblin Steel Site:

- *Environmental Site Review of Roblin Steel Plant Site, Dunkirk, New York*, Acres International Corp., January, 1989.
- *Phase II Environmental Site Assessment – Roblin Steel Plant Site,* Dunn Geoscience Corp., October, 1990.
- *Groundwater Assessment, Roblin Steel Plant, Dunkirk, New York*, Harrison Hydrosciences, May, 1991.

- *Analysis of Soil and Slag Piles for Lead, Roblin Steel Site*, Roy F. Weston, Inc., January, 1994.

CHA also reviewed the NYSDEC, Region 9 Office files pertaining to the Former Roblin Steel Site. Based upon these reports and files, the following information was noted concerning conditions at the Former Roblin Steel Site:

- Contamination of sewer sediment and/or water; subsurface soil; fill; and groundwater was detected at concentrations that exceed current NYSDEC soil cleanup objectives and groundwater standards, respectively;

- Contaminants detected in groundwater included chlorinated solvents and their degradation products that are denser than water and have the potential to migrate vertically downward through an aquifer. The presence of these compounds coupled with the shallow depth to bedrock, indicates the potential for contaminant migration into the bedrock aquifer;

- The NYSDEC commented that questionable monitoring well construction, installation and sampling methods were used at the site, and that the monitoring wells were not of sufficient depth to investigate the potential presence of Dense Non-Aqueous Phase Liquid (DNAPL) contaminants;

- Confirmatory samples collected following the completion of an U.S. Environmental Protection Agency (EPA) emergency response action at the site indicated that residual lead levels in soil at several locations exceed the current NYSDEC recommended soil cleanup objectives. The EPA contractor responsible for collecting and analyzing the samples concluded that further investigations are necessary to establish the extent of lead levels and the associated health risks. Records reviewed by CHA also indicate that the EPA completed a Preliminary Assessment of the site in 1995. CHA is currently attempting to obtain the report summarizing this assessment from the EPA with the hope that more extensive lead data are presented therein.

In summary, data concerning the chemistry of sewer sediment and water, fill, soil and groundwater were generated for the Former Roblin site. With the exception of the groundwater data, these results appear to be reliable. The groundwater data is considered suspect due to questionable monitoring well construction and sampling techniques, and is viewed as inadequate for the purpose of defining the magnitude and extent of groundwater contamination beneath the site. Although the soil data appear to be reliable, they are not sufficient to characterize the entire site. Furthermore, site conditions may have changed significantly over the eight (8) years that have elapsed since these data were collected. As such, CHA recommends that the existing soil data be supplemented, and that groundwater conditions in both the overburden and shallow bedrock zones be investigated. The scope of the additional investigation recommended is detailed in the following section.

4.0 COMBINED SITE CHARACTERIZATION PROGRAM

CHA has developed the following scope of work to investigate potential environmental concerns identified in connection with the Edgewood Warehouse Site, and to supplement previous environmental studies completed at the adjacent Former Roblin Steel Site. The investigative program detailed below is intended to generate sufficient data to enable the generation of a Voluntary Cleanup Work Plan, if necessary, for submittal to the NYSDEC. The Work Plan will define a specific scope of work required to remediate the site such that it is suitable for redevelopment for light industrial use. Once approved by the NYSDEC, the cost of the cleanup program outlined in the plan can be determined and, together with the approved plan, can be used to market the project site to potential developers and/or to negotiate with interested private parties for redevelopment.

TASK #1: HEALTH AND SAFETY PLAN

A site specific Health and Safety Plan (HASP) complying with the requirements of 29 CFR 1910.210 will be prepared prior to initiation of field work.

TASK #2: GEOPHYSICAL SURVEY

Completion of a surface geophysical survey to identify buried metallic items (e.g., drums, underground storage tanks, etc.) potentially present on the subject property. This task shall be performed using Geonics Limited Model EM61 buried metal detector, and the results shall be utilized to focus the subsurface investigation of the site through the more effective placement of monitoring wells and test pits.

TASK #3: WASTE CHARACTERIZATION

Samples of potential hazardous waste materials contained within the three 55-gallon drums located on the Edgewood Warehouse Site will be collected for the purpose of completing waste characterization analyses. Any suspect liquid and/or solid materials occurring within other containers present on the Former Roblin Site will also be sampled for this purpose. Samples will be analyzed for Ignitability, Reactivity, Corrosivity and Toxicity. The latter analysis will be performed using the Toxicity Characteristic Leaching Procedure (TCLP) with the resulting sample extracts analyzed for volatile and semi-volatile organic compounds and metals. CHA has assumed that 1 composite sample will be collected from the three drums and submitted for waste characterization.

TASK #4: SURVEY/TESTING OF POTENTIAL PCB TRANSFORMERS AND ELECTRICAL EQUIPMENT

A survey of all electrical equipment stored in the Edgewood Warehouse building will be performed to identify and inventory items that contain or may contain PCBs. The inventory will include the type, location and a description of each item identified. Samples will be collected from all of the potential PCB-containing electrical equipment identified during the survey, as well as from the six (6) potential PCB-containing transformers noted during the Phase I ESA of the Edgewood Site. The samples will be analyzed for PCBs using EPA Method 8080. CHA has assumed that 8 samples will be collected and submitted for PCB analysis.

TASK #5: VAULT, SUMP AND DRAIN INVESTIGATION

The covered vaults or sumps located within and along the northern exterior of the Edgewood Warehouse building will be inspected in an effort to determine their function and to identify and sample any suspect solids, liquids or sludges that may be present within these structures. Sediment samples will also be collected from the catch basins and floor drains located within and around the warehouse. All of the samples will be analyzed for the volatile and semi-volatile organic compounds and metals appearing on the EPA Target Compound and Target Analyte Lists, respectively, and for PCBs. CHA has assumed that 5 samples will be collected and submitted for analysis.

TASK #6: SURFACE SOIL/FILL SAMPLING

Surface soil samples will be collected from the Edgewood site for chemical analysis. The samples will be collected as grab samples using a grid system, and will be analyzed for the volatile and semi-volatile organic compounds and metals appearing on the EPA Target Compound and Target Analyte Lists, respectively, and PCBs. Grab samples will also be collected from areas of the Former Roblin site that were not previously sampled, and will be analyzed for the same parameter list. CHA has assumed that 10 samples will be analyzed for this parameter list. Additionally, surface soil/fill samples will be collected from the areas in which the EPA detected elevated lead levels for the purpose of delineating the lead contamination. These samples will be analyzed for total lead only. CHA has assumed that a total of 30 surface soil/fill samples will be analyzed for lead.

Lastly, three background soil samples will be collected from appropriate locations selected as a result of consultations with the NYSDEC. The background samples will be analyzed for the volatile and semi-volatile organic compounds and metals listed on the Target Compound and Target Analyte Lists, respectively, and for PCBs.

TASK #7: TEST PIT EXCAVATION

A series of test pits will be excavated across the combined Edgewood/Roblin site for the purpose of investigating metallic anomalies (e.g., potential buried drums, USTs, etc.) identified as a result of the geophysical survey described in Task #2. The location of these test pits will be determined based upon the aforementioned survey. Test pits will also be excavated on the eastern portion of the Former Roblin site, where the depth to bedrock is indicated to be less than 5 feet, for the purpose of characterizing the native soil and/or fill material in this area, and to enable the collection, field screening and chemical analysis of soil and fill samples from this area. All test pit excavation activities will be monitored by an experienced scientist or engineer, and overburden/fill stratigraphy will be logged. Real time air monitoring with a photo-ionization detector (PID) will be performed during excavation activities as part of the health and safety program.

TASK #8: DRILLING AND MONITORING WELL INSTALLATION, DEVELOPMENT AND SAMPLING

A subsurface investigation will be conducted to confirm the presence or absence of soil and/or groundwater contamination on the Edgewood Site, and to more thoroughly characterize the extent and distribution of soil and groundwater contamination on the Former Roblin Steel site. This will involve the drilling of a series of test borings across the combined site, and the installation of a number of groundwater monitoring wells on the combined site. All drilling activities will be supervised and documented by an experienced scientist or engineer, and will be performed under Modified Level D health and safety specifications. Air monitoring using a PID will also be performed throughout the drilling program.

A total of 25 test borings will be drilled on the approximately 18.46 ± acre combined site, 15 of which will occur within and around the Edgewood Warehouse building, while the remaining 10 will be drilled on the Former Roblin site. Ten (10) of these test borings will be completed with groundwater monitoring wells screened in the overburden. Four (4) additional shallow bedrock monitoring wells will be installed, three (3) of which will be completed on the Former Roblin site, while the remaining bedrock well will be installed on the Edgewood site. The locations of the test borings and monitoring wells were selected to investigate the numerous areas of potential concern identified on the Edgewood Warehouse site (e.g., pickling areas, pits, vaults, etc.), as well as to

provide both up-gradient and down-gradient groundwater monitoring points. The test boring and monitoring well locations selected for the Former Roblin site were selected to accomplish similar objectives, while complementing and confirming the existing data for the site. The proposed locations of the test borings and monitoring wells are depicted on the attached schematic site plan. The actual boring and well locations may be modified based upon the results of the surface geophysical survey and/or field conditions.

All test borings will be advanced to equipment refusal using hollow stem augers, and continuous split-spoon samples will be collected throughout the total depth of each borehole. Test borings that are to be completed with monitoring wells will be drilled using 4-1/4-inch I.D. augers, while 2-1/4-inch I.D. augers will be utilized for the remaining test borings. The wells will be constructed of 2-inch PVC and screened across the water table in the overburden. Previous data from investigations of the Former Roblin site indicate that overburden thickness ranges from approximately 2-14 feet, with the thickness increasing from east to west, and that groundwater occurs at depths of less than ten (10) feet below the ground surface. Therefore, CHA has assumed that the test borings and monitoring wells will be drilled to an average depth of 15-feet below the existing ground surface.

For the four (4) bedrock monitoring wells, the boreholes will be advanced to the top of bedrock using 6-5/8-inch I.D. hollow stem augers and a PVC surface casing will be grouted in place to seal off the overburden. Ten to 15 feet of bedrock will then be cored at each well location using an NX core barrel. The resulting coreholes will be reamed using a 3-7/8-inch roller bit to facilitate the installation of 2-inch PVC wells screened in the shallow bedrock zone.

The newly installed monitoring wells will be developed and gauged to determine static water levels for the purpose of identifying groundwater flow direction and gradient. Water levels within the eight existing monitoring wells on the Former Roblin site will also be recorded, and the integrity of these wells will be visually inspected. Additionally, the elevations of the top of the well risers and protective casings will be surveyed relative to a reference elevation of 100.00 feet. Lastly, representative groundwater samples will be obtained from the new monitoring wells for chemical analysis. Samples may also be obtained from some of the existing wells, depending upon their condition.

Materials generated during the investigation (e.g., auger spoils, development and decontamination fluids, etc.) will be managed in the following manner:

- Auger spoils will be staged on-site as per NYSDEC TAGM 4032, *Disposal of Drill Cuttings*, pending the results of the chemical analysis of soils. The staged cuttings will be covered with plastic to prevent interaction with the environment. If the materials are determined to be hazardous, they will require proper treatment or disposal;

- Soil excavated during the test pit program will be placed back in the test pit from which it originated;

- Fluids generated during monitoring well development and purging will be discharged to the ground surface in the vicinity of the well from which they originated;

- Decontamination fluids will be allowed to infiltrate the ground surface of the site.

TASK #9: SAMPLE SCREENING AND ANALYSIS

All soil/fill samples from split spoons and test pits will be field screened for Total Organic Vapors (TOVs) using a photoionization detector. Samples from the vadose zone that exhibit TOV levels indicative of contamination, will be selected for chemical analysis. For the purpose of this proposal, CHA has assumed that 20 subsurface soil/fill samples will be submitted for chemical analysis. These samples will be analyzed for the volatile and semi-volatile organic compounds and metals (total) appearing on the EPA Target Compound and Target Analyte Lists, respectively, and PCBs. This is in addition to the following samples from other environmental media that will be analyzed for the same parameter list:

- Ten (10) surface soil/fill samples
- Three (3) background surface soil samples
- Five (5) sewer sediment samples

The methods to be utilized for these analyses are as follows:

ANALYTES	METHOD
TCL Volatile Organic Compounds	EPA Method 8260
TCL Semi-Volatile Organic Compounds	EPA Method 8270
PCBs	EPA Method 8080
TAL Metals (Total)	Method 6010/7471

Groundwater samples from each of the 14 newly installed monitoring wells and possibly from some of the existing monitoring wells will be analyzed for the same parameters, except PCBs, using the methods listed above. Additional QA/QC

samples (e.g., trip blanks, field blanks, etc.) will be collected and analyzed to ensure the accuracy and reliability of the data. CHA has estimated that a total of 20 groundwater samples will undergo chemical analysis.

As previously noted, the following additional samples will be collected and analyzed as follows:

- 30 additional surface soil samples will be collected and analyzed for total lead using Method 6010 or 7420;
- An estimated eight (8) samples will be collected from potential PCB-containing transformers and electrical equipment for PCB analysis using Method 8080.
- One (1) composite sample of the material contained within the three (3) drums on the Edgewood site will be collected and analyzed for Ignitability, Reactivity, Corrosivity and Toxicity. The latter analysis will be performed using the TCLP with the resulting sample extract analyzed for volatile and semi-volatile organic compounds and metals.

All chemical analyses will be performed by a New York State Department of Health (NYSDOH) certified laboratory.

TASK #10: DATA EVALUATION AND REPORTING

The data resulting from the execution of Tasks 2-9 will be reviewed and evaluated, and a report summarizing and documenting the Phase II ESA will be prepared. The report will: (1) discuss the investigative measures employed; (2) describe the surface and subsurface conditions observed; (3) compare the analytical data with applicable regulatory levels; and (4) assess the implications of the site conditions encountered. The report will also contain raw and summarized analytical data, test boring and monitoring well construction logs, well sampling logs, groundwater contour maps illustrating the direction of flow in both the water table and shallow bedrock aquifers, and other pertinent data tables and maps.

TASK #11: DEVELOPMENT OF VOLUNTARY CLEANUP WORK PLAN

A Voluntary Cleanup Work Plan will be developed for the combined Edgewood/Roblin site based upon the results of the Phase II Investigation, and the type, configuration and method of construction of the redevelopment proposed for the site. The Work Plan will identify the cleanup objectives; describe the remedial measures to be employed to satisfy these objectives; and will outline the methods to be utilized to confirm that the cleanup objectives have been achieved. The Work Plan will be suitable for submittal to the NYSDEC as a precursor to, or a component of, a Voluntary Cleanup Agreement between the developer and the NYSDEC.

An estimate of the costs associated with the implementation of the RAP will be provided separately for use in marketing the redevelopment site or negotiations with an interested developer.

TASK #12: REGULATORY MEETINGS AND NEGOTIATIONS

Meetings and discussions will be held with the NYSDEC Division of Environmental Remediation to present and discuss the project, to review the results of the combined site characterization program and to negotiate the cleanup objectives and scope of the Voluntary Cleanup Work Plan.

Should the Grant Program be identified as the preferred regulatory program under which to advance this project, the preceding scope of work would serve as the basis for the Site Investigation (SI) required under this program. However, the following additions or modifications to this scope would be needed to satisfy the Grant Program requirements:

- A detailed *Site Investigation/Remedial Alternatives Report (SI/RAR) Work Plan* would have to be generated for review and approval by the NYSDEC;
- A topographic and boundary survey of the combined site would have to be completed;
- In-situ hydraulic conductivity testing of the overburden and bedrock would have to be performed to assist in the determination of potential contaminant migration rates;
- The chemical analysis of environmental samples would have to be performed in accordance with NYSDEC Analytical Services Protocol (ASP);
- Validation of 20% of the data generated during the investigation would be necessary;
- If contamination is found to be migrating off-site, additional investigations will be required to define the extent of the off-site contamination;
- A qualitative Risk Assessment must be performed to determine the potential threats to human health and the environment posed by the site; and
- A detailed analysis of remedial alternatives must be performed and documented in a *Remedial Alternatives Report* for NYSDEC review.

5.0 ESTIMATED COSTS FOR COMBINED SITE CHARACTERIZATION PROGRAM

6.0 POTENTIAL SITE REMEDIATION SCENARIOS

Based upon existing information concerning environmental conditions at the Former Roblin site, and discussions with the NYSDEC Division of Environmental Remediation, the scope of site remediation activities that might be acceptable under the Voluntary Cleanup Program could potentially include:

- Excavation and off-site disposal or on-site containment of localized areas of soil and fill containing high concentrations of lead and/or other contaminants;
- Closure of the existing sewer system at the site to prevent the leaching and off-site migration of contaminants from sewer sediment;
- Capping of the site with asphalt and buildings to prevent the infiltration of precipitation through contaminated soil and minimize the leaching of contaminants into groundwater;
- Implementation of a periodic groundwater monitoring program at the site; and
- Institution of deed restrictions for the properties to prevent more intensive uses in the future.

It is important to note, however, that the remedial measures outlined above are speculative at this point because site conditions have not been fully characterized. Should supplemental investigations identify more extensive and severe environmental problems, such as significant contamination of the bedrock aquifer beneath the site, the remediation program could be much more extensive and complicated. The same holds true for the Edgewood Warehouse site, which has not yet been investigated beyond the Phase I ESA level.

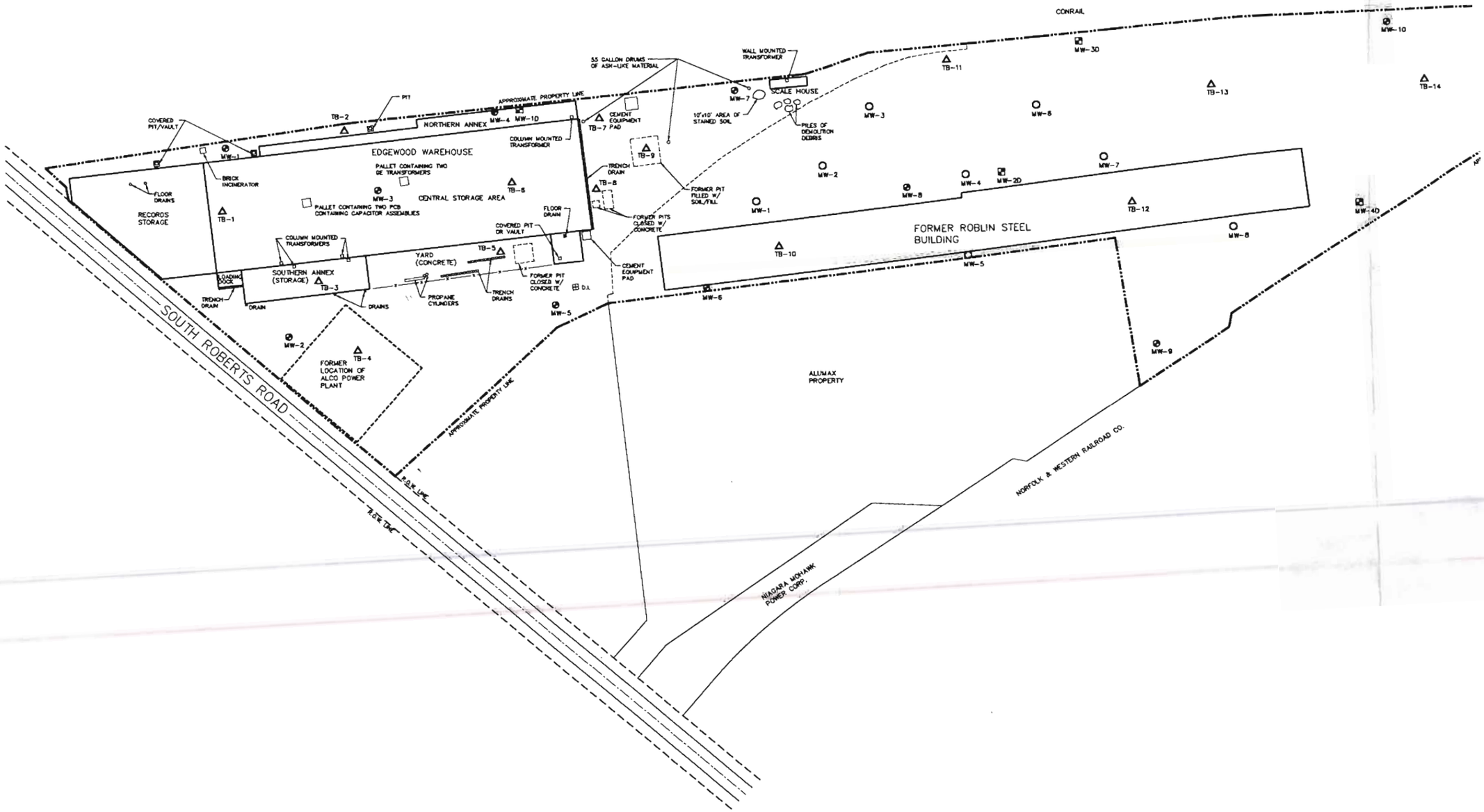
Should you have any questions concerning the information presented in this letter or wish to schedule a meeting to discuss the project, please do not hesitate to contact me at (716) 847-6310.

Sincerely,

CLOUGH, HARBOUR & ASSOCIATES LLP
ENGINEERS, SURVEYORS, PLANNERS & LANDSCAPE ARCHITECTS

Robert R. Napieralski, C.P.G.
Project Manager

/RRN


CONRAIL
MW-10
55 GALLON DRUMS OF ASH-LIKE MATERIAL
WALL MOUNTED TRANSFORMER
TB-11
MW-30
TB-14
TB-13
SCALE HOUSE
MW-7
10'x10' AREA OF STAINED SOIL
PILES OF DEMOLITION DEBRIS
MW-3
MW-8
APPROXIMATE PROPERTY LINE
TB-2
PIT
COVERED PIT/VAULT
NORTHERN ANNEX
MW-4
MW-1D
CEMENT EQUIPMENT PAD
TB-7
COLUMN MOUNTED TRANSFORMER
EDGEWOOD WAREHOUSE
TB-9
TRENCH DRAIN
TB-8
FORMER PIT FILLED W/ SOIL/FILL
FORMER PITS CLOSED W/ CONCRETE
MW-2
MW-4
MW-2D
MW-7
MW-1
MW-8
TB-12
MW-8
MW-40
FORMER ROBLIN STEEL BUILDING
TB-10
MW-5
MW-6
CEMENT EQUIPMENT PAD
FLOOR DRAINS
BRICK INCINERATOR
PALLET CONTAINING TWO DE TRANSFORMERS
MW-3
CENTRAL STORAGE AREA
TB-6
PALLET CONTAINING TWO PCB CONTAINING CAPACITOR ASSEMBLIES
RECORDS STORAGE
TB-1
FLOOR DRAIN
COVERED PIT OR VAULT
COLUMN MOUNTED TRANSFORMERS
YARD (CONCRETE)
TB-5
LOADING DOCK
SOUTHERN ANNEX (STORAGE)
TB-3
TRENCH DRAIN
DRAIN
DRAINS
PROPANE CYLINDERS
TRENCH DRAINS
FORMER PIT CLOSED W/ CONCRETE
D.I.
MW-5
MW-2
TB-4
FORMER LOCATION OF ALCO POWER PLANT
SOUTH ROBERTS ROAD
R.O.W. LINE
R.O.W. LINE
APPROXIMATE PROPERTY LINE
ALUMAX PROPERTY
MW-9
NORFOLK & WESTERN RAILROAD CO.
NIAGARA MOHAWK POWER CORP.

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October 30, 1997

Ms. Cheryl Ruth
Sr. Environmental Project Coordinator
Chautauqua County Department of
Public Works
454 North Work Street
Falconer, New York 14733

Re: **Phase I Environmental Site Assessment**
Edgewood Warehouse Site - 320 South Roberts Road, Dunkirk, New York
CHA Project No. 6801.07.01.

Dear Ms. Ruth:

Enclosed please find two copies of the report presenting the results of the Phase I Environmental Site Assessment (ESA) of the above referenced site completed by Clough, Harbour & Associates LLP (CHA) on behalf of the County of Chautauqua Industrial Development Agency. This Phase I ESA was performed in accordance with *American Society for Testing and Materials* (ASTM) Practice E-1527, and our September 15, 1997 proposal.

As reflected in the report, recognized environmental conditions were identified in connection with the subject property. These conditions are primarily related to the extensive industrial history of the industrial complex containing the subject property, and the documented occurrence of soil and groundwater contamination on the adjacent former Roblin Steel site which is situated hydrologically up-gradient from the subject property.

In consideration of these conditions, CHA recommends the further investigation of the subject property to define potential environmental liabilities associated with the acquisition of the property. The scope of the additional investigation recommended includes the following:

- Collection and chemical analysis of soil, groundwater and sewer sediment/water samples to investigate potential impacts to these media;
- Testing of active and inactive transformers present within the site buildings to determine the presence or absence of PCBs;
- Identification of all PCB-containing electrical equipment currently stored within the warehouse building;

- Disposal characterization of the solid substance observed within three uncovered drums extant on the subject property; and

- Evaluation of the condition of asbestos containing materials (ACMs) identified within the warehouse building.

Furthermore, prior to the acquisition of the subject property, CHA would recommend that all PCB-containing electrical equipment; solid waste; hazardous waste; and friable or damaged ACMs be removed from the site for disposal in accordance with all State and Federal Regulations.

Please do not hesitate to contact me at (716) 847-6310 should you have any questions concerning the report or aforementioned recommendations, or should you desire a detailed scope of work and cost estimate for the further investigation of the property.

Sincerely,

CLOUGH, HARBOUR & ASSOCIATES LLP
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Robert R. Napieralski, C.P.G.
Project Manager

Robert W. Badger, P.E.
Partner

RWB/rrn

enclosures

PHASE I ENVIRONMENTAL SITE ASSESSMENT REPORT

EDGEWOOD WAREHOUSE
320 SOUTH ROBERTS ROAD
DUNKIRK, NEW YORK
14048

PROJECT NO. 6801-07-01

OCTOBER 30, 1997

PREPARED FOR:

COUNTY OF CHAUTAUQUA INDUSTRIAL DEVELOPMENT AGENCY
200 HARRISON STREET
JAMESTOWN, NEW YORK
14701

PREPARED BY:

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APPENDICES

1.0 INTRODUCTION

Clough, Harbour & Associates LLP (CHA) was retained by the County of Chautauqua Industrial Development Agency (CCIDA) to perform a Phase I Environmental Site Assessment (ESA) of the Edgewood Warehouse site located at 320 South Roberts Road in the City of Dunkirk, Chautauqua County, New York (Figure 1). The purpose of this Phase I ESA was to identify recognized environmental conditions, as defined by *American Society for Testing and Materials* (ASTM) Practice E 1527-94, in connection with the subject property.

The term recognized environmental conditions is defined by ASTM as the presence or likely presence of any hazardous substance or petroleum products on a property under conditions that indicate an existing release, a past release, or a material threat of a release of any hazardous substances or petroleum products into structures on the property or into the ground, groundwater or surface water of the property. The term is not intended to include de minimis conditions that generally do not present a material risk of harm to public health or the environment, and that generally would not be the subject of an enforcement action if brought to the attention of the appropriate regulatory agencies.

This *Phase I ESA Report* has been prepared by CHA to provide a general description of the subject property, any structures occurring thereon, and the site vicinity; discuss the current and historical usage of the property; and identify the presence or absence of recognized environmental conditions in connection with the subject site based upon the results of a historical and regulatory records review, interviews and a thorough site inspection.

2.0 SCOPE OF WORK

The major components of this Phase I ESA included the review of available regulatory and historical information for the subject property and surrounding properties; interviews with the current property owner/occupant, other knowledgeable persons and local government officials; a thorough site inspection of on-site buildings and grounds; and reconnaissance of the site vicinity. The following subsections present a detailed outline of the scope of work performed for this Phase I ESA.

2.1 HISTORICAL REVIEW

This component involved the review of standard historical sources to develop a history of the previous uses or occupancies of the property and surrounding area in order to identify those uses or occupancies that are likely to have led to recognized environmental conditions in connection with the subject property. Where reasonably ascertainable concerning the required project schedule, the following standard historical sources were consulted to identify uses of the property from 1940 to the present:

- Available Aerial Photographs
- Property Tax Files
- Recorded Land Title Records
- USGS 7.5 Minute Topographic Maps
- Local Street Directories
- Building Department Records
- Zoning/Land Use Records

Furthermore, at least one of the above listed historical sources was consulted to investigate past uses of the site prior to 1940 until the time at which the property was not yet developed. The historical usage of properties in the surrounding area was also researched as part of this review.

2.2 REGULATORY RECORD SEARCH

A review of Local, State and Federal record sources relating to the presence or occurrence of facilities or spills involving solid and hazardous waste and petroleum products on the subject property and/or properties occurring within the approximate minimum search distances established in ASTM Practice E-1527 was performed. State and Federal record sources were reported by the Environmental Risk Imaging and Information Service (ERIIS), and included the following:

- Federal NPL Report
- Federal CERCLIS List
- Federal List of No Further Remedial Action Planned Sites
- Federal RCRA TSDF List
- Federal RCRA Hazardous Waste Generators List
- Federal ERNS List
- State List of Inactive Hazardous Waste Sites
- State List of Solid Waste Facilities
- State List of Leaking Storage Tanks
- State List of Chemical and Petroleum Bulk Storage Tanks
- State List of Major Oil Storage Facilities
- State List of Spills

2.3 INTERVIEWS

Reasonable attempts were made to conduct interviews with the property owner/occupant, current and former employees, and local government officials for the purpose of obtaining information indicating recognized environmental conditions in connection with the subject property.

2.4 SITE INSPECTION

A thorough site inspection of the property was conducted to identify visible environmental concerns such as:

- current and past use of the property and adjoining parcels
- the physical setting of the site including a general description of structures and improvements on the site
- evidence of hazardous waste or petroleum product generation, storage, treatment, or disposal
- storage tanks
- strong or noxious odors
- pools of liquid
- drums
- PCBs
- drains or sumps
- pits, ponds or lagoons
- stained soils and surfaces
- stressed vegetation
- solid waste
- waste water and storm water discharges
- on-site septic systems

2.5 ADDITIONAL SERVICES

No additional services were provided in association with this Phase I ESA. This Phase I ESA did not include the execution of: pressure testing of any discovered or undiscovered USTs; analytical testing for lead-based paint or potential asbestos containing building materials; penetrative or surface geophysical investigations, or the collection and analysis of groundwater, surface water, or soil samples for the purposes of characterizing physical or chemical conditions existing within the subsurface of the site.

3.0 SITE DESCRIPTION

3.1 GENERAL

The subject property is part of a larger industrial park, located at 320 South Roberts Road in the City of Dunkirk, Chautauqua County, New York, which is zoned M-2 for General Industrial District. The subject property is composed of three tax parcels, including tax parcel numbers 30-1-9, 30-1-10.2 and 30-1-7.1, and also contains a Conrail easement which extends along the southern property boundary. The Edgewood Warehouse site encompasses approximately 7.0 ± acres and contains an active warehouse, and a second, smaller building that is not currently in use. The remainder of the property consists primarily of aged asphalt and gravel parking areas. Perimeter chain link fencing topped with barbed wire surrounds the entire property. A schematic site plan of the subject property is presented in Figure 2.

The main portion of the warehouse building was erected between 1909 and 1910, and was the subject of numerous additions during subsequent years. This building is constructed primarily of brick with concrete block additions, does not contain a basement, and currently encompasses approximately 165,000 square feet. Internally, the warehouse can be divided into three main areas including: (1) the western end of the building which is generally unused with the exception of some file boxes containing records from the former Dunkirk Ice Cream; (2) the central storage area utilized for the warehousing of equipment, packaging and operating supplies associated with the Fieldbrook Farms Dairy; and (3) the southern annex which is used primarily for the storage of packaging materials for the dairy industry and also contains an heated office trailer for warehouse employees. Other unused areas of the warehouse include the annex that extends along the northern wall of the building, and a 49' x 46' concrete block addition near the southeastern corner of the building.

The second on-site building is situated to the east of the warehouse, along the northern site boundary. This building is constructed of concrete block, and encompasses approximately 1,000 square feet.

3.2 NEIGHBORING PROPERTIES

Land use in the site vicinity is characterized by a mixture of industrial and residential properties. The project site is bounded to the north by an active railroad yard; to the east by an abandoned steel mill formerly operated by Roblin Industries; to the west by South Roberts Road, beyond which lie residences and an active industrial park located along Talcott Street; and to the south by a dormant industrial facility owned by Alumax, Inc. Residential areas lie further to the north and south of the subject property.

3.3 SITE TOPOGRAPHY

The topography of the site is generally level with an elevation of approximately 600 feet above mean sea level (AMSL).

3.4 SITE GEOLOGY AND HYDROLOGY

3.4.1 Soils

Based upon a review of the *Soil Survey of Chautauqua County, New York*, the predominant soil unit occurring on the subject site is the Niagara silt loam (NgA). The Niagara soils are nearly level, very deep and somewhat poorly drained. The permeability of the Niagara silt loam is categorized as moderate to moderately slow, and the erosion hazard is characterized as slight.

3.4.2 Overburden and Bedrock

Based upon a review of the *Surficial Geologic Map of New York - Niagara Sheet* (1988), overburden on-site consists of lacustrine silt and clay deposits. The site is located in the Erie-Ontario Plain physiographic province and is underlain by bedrock consisting of Upper Devonian shale belonging to the Canadaway Group, according to the *Geologic Map of New York - Niagara Sheet* (1970).

3.4.3 Surface Water and Groundwater

Storm water runoff occurring on the property appears to drain: (1) into the storm sewer which extends beneath South Roberts Road; (2) into a catch basin situated near the southeast corner of the warehouse building; and (3) via uncontrolled overland flow in other areas of the site. A review of the *Flood Insurance Rate Map* (1992), developed for the project vicinity by the Federal Emergency Management Agency, indicated that the project site is located in an area designated Zone X for areas determined to be outside of a 500 year floodplain.

Regional groundwater flow direction, inferred from topographic mapping of the area, appears to be to the northwest toward the discharge area represented by Lake Erie. This was confirmed during the subsurface investigation of the adjacent Roblin Steel property, as discussed in Section 5.4. Residences and businesses in the site vicinity are serviced by the municipal water supply and sanitary sewer systems of the City of Dunkirk.

3.5 WETLAND MAPPING

Examination of the *New York State Freshwater Wetlands Map*, Dunkirk Quadrangle, and the *National Wetlands Inventory Map* for the project vicinity revealed that there are no state or federal wetlands mapped on the subject property or adjoining properties.

4.0 HISTORICAL REVIEW

4.1 CITY DIRECTORIES

City directories were reviewed at the Dunkirk Free Library and the Dunkirk Historical Museum for information concerning the historical occupancy and use of the subject property and adjoining industrial complex, which has a street address of 320 South Roberts Road. According to these directories, the occupants of the industrial complex containing the subject property included the following on the dates indicated:

- 1983: 320 South Roberts Road: Cenedella Wood Products
  Plymouth Tube Co.
  Roblin Steel Co.
- 1980: 320 South Roberts Road: Cenedella Wood Products
  Plymouth Tube Co.
  Roblin Steel Co.
  Allegheny Ludlum Steel (Warehouse)
- 1977: 320 South Roberts Road: Roblin Steel Co.
  Cenedella Wood Products
  Plymouth Tube Co.
  Allegheny Ludlum Steel (Warehouse)
- 1966: 320 South Roberts Road: Progress Park Industrial Complex
  - Dunkirk Lingerie Inc.
  - Roblin Steel
  - Cenedella Wood Products (Crate and Box Manufacturers)
- 1962: 320 South Roberts Road: ALCO Products Inc.
- 1950: 320 South Roberts Road: American Locomotive Company - ALCO Products Division
- 1940: 320 South Roberts Road: American Locomotive Company - ALCO Products Division

- 1935: East side of South Roberts Road: American Locomotive Company
- 1930: East side of South Roberts Road: American Locomotive Company
- 1910: East side of South Roberts Road: American Locomotive Company

No references to the presence of locomotive works or other industrial facility on the east side of South Roberts Road were noted in the directories prior to 1910. However, the Brooks Locomotive Works of Dunkirk, New York was listed in the 1873-1874 *Gazetteer & Business Directory of Chautauqua County, New York*.

Based upon this information, the subject property was part of an industrial complex historically utilized for the manufacture of locomotives, steel foundry operations, warehousing, wooden crate and box manufacturing, and other industrial/manufacturing applications from as early as 1910.

4.2 SANBORN FIRE INSURANCE MAPS

Sanborn fire insurance maps for the subject property and surrounding area from the years 1931, 1947 and 1964 were provided by ERIIS. Copies of these maps are provided in Appendix A. Additionally, Sanborn fire insurance maps for the years 1893 and 1919 were viewed at the Dunkirk Historical Museum. Based upon a review of these maps, the following information concerning the historical use of the subject property and adjacent properties was indicated:

- 1893 - No coverage of the subject property was provided, however, an industrial complex containing the Brooks Locomotive Works was depicted to the west of South Roberts Road, extending along Talcott Street.

- 1919 - Only partial coverage of the western portion of the project site was provided on this map. The subject property contained two buildings which were indicated to be part of a larger complex occupied by the American Locomotive Company - Brooks Works that had expanded eastward across South Roberts Road. The map showed the western portion of the existing warehouse building, which was labeled "tank paint shop", while a second building labeled "power house" was depicted to the south along South Roberts Road.

- 1931 - The site was bounded to the north, south and east by rail lines and contained two main buildings, including the existing warehouse building and former power house to the south. Five smaller structures, including a gatehouse, were also located on the subject site. The western portion of the existing warehouse building was labeled "tank paint shop". The subject property was associated with the American Locomotive Co. - Brooks Works, the complex for which encompassed a number of buildings to the east and southeast of the subject property, as well as facilities to the west across South Roberts Road.

- 1946 - Site conditions depicted on this map were identical to those shown on the 1931 map, and the site was still indicated to be part of the American Locomotive Co. (ALCO) -Brooks Works. With the exception of three buildings, however, the large ALCO complex to the west across South Roberts Road had been removed. Only the carpenter shops and an additional "factory building" remained.

- 1964 - Site conditions depicted on this map were identical to those shown on the 1931 and 1946 maps. However, no references to ALCO were shown, and the industrial complex containing the subject property was indicated to be occupied by Progress Park, Inc. and Roblin-Seaway Industries, Inc. The former ALCO facilities situated to the west of South Roberts Road had been expanded and were occupied by Van Raalte Co., Inc. and Kraft Food Division of National Dairy Products Corp., manufacturers of silk underwear and jelly and fruit juice, respectively.

4.3 HISTORICAL MAPS AND ATLASES

An historical map from the year 1882, maintained by the Dunkirk Historical Museum, indicated that the subject property was undeveloped at that time. This map depicted the Brooks Works locomotive manufacturing complex to the west of the subject site, across South Roberts Road. This is consistent with the 1893 Sanborn fire insurance mapping of the property discussed in the preceding section.

4.4 HISTORICAL REFERENCES

A 1985 thesis paper by D.P. Przytula concerning the history of the Brooks Locomotive Works in Dunkirk, New York was reviewed at the Dunkirk Historical Museum. This paper indicated that a large Erie Railroad engine house constructed for a terminal station to the west of the subject

property was converted into locomotive works in 1868. In 1901, the Brooks Works became affiliated with the American Locomotive Company (ALCO) and was the largest locomotive manufacturing facility east of the Mississippi River. The facility manufactured locomotives until 1930, at which time it was converted to enable the manufacturing of process equipment consisting mainly of heat exchangers, pressure vessels and pipe.

According to information presented in this paper, most of the ALCO plant west of South Roberts Road was demolished in 1936. This is consistent with that depicted in the 1947 Sanborn fire insurance map. After this time, manufacturing operations were presumably undertaken primarily in the industrial complex situated east of South Roberts Road, which contained the subject property and existing warehouse building constructed in 1910. Until its closing in 1963 due to a combination of labor, union and management problems, the ALCO facility manufactured a variety of process and military equipment. The latter included gun carriages, fragmentation bombs, thrust shafts and king posts for naval vessels, and missile housings.

An undated site plan of the ALCO complex east of South Roberts Road was included in the thesis paper. This site plan provides information concerning the historical configuration of the plant buildings and operations occurring therein, including the current warehouse and former power building located on the subject property. This site plan indicates that portions of the existing warehouse building previously housed offices, storage facilities, and a machine shop associated with the ALCO complex. Based upon this plan, sheet metal fabrication, tube bundle assembly, assembly and testing of heat exchangers, general machining operations, and shot blasting of parts was performed in the machine shop. A copy of this plan is provided in Appendix B.

The site plan also indicates that the second building located on the subject property, which was demolished in 1989, contained the ALCO facility power plant, repair shop, semi-works for experimental equipment, and the plant hospital.

4.5 AERIAL PHOTOGRAPHS

Available aerial photographs of the subject site and surrounding properties for the years 1956 through 1995, maintained by the Chautauqua County Department of Planning, were reviewed at five to seven year increments to provide information concerning the history of development of the subject property and surrounding area. Because of the relatively small scale of these photographs, it was difficult to discern a high level of detail relative to historic site conditions, however, the general use of the site and surrounding properties was defined.

According to the 1956 photograph, the subject property was part of a larger industrial complex situated east of South Roberts Road. This complex occupied the same triangular area as that which currently contains the Edgewood Warehouse, Alumax and former Roblin Steel facilities. Two buildings were visible on the subject property in the 1956 photograph, including the existing warehouse building and a second building to the southwest along S. Roberts Road. Based upon other historical records, the second building housed the power generating facilities for the former locomotive manufacturing complex, and was later occupied by Cenedella Wood Products. A rail siding was shown along the southeastern property boundary, while a rail yard was present to the north of the site. Land use in the surrounding area based on the 1956 photograph was a mixture of industrial and residential, with several large industrial complexes visible to the north and west of the subject property. Residential areas bordered the industrial complexes to the north and south.

The condition of the subject property and adjacent industrial facilities in the subsequent photographs is very similar to that shown in the 1956 photograph. The second on-site building occurring on the subject property, however, is no longer present in the 1989 photograph, and the areal extent of the neighboring building to the east, the former Roblin Steel facility, has been substantially reduced.

4.6 BUILDING DEPARTMENT RECORDS

The office of the City of Dunkirk Housing, Building and Zoning Officer was contacted regarding records pertaining to the subject property. Specifically, records of building permits, underground storage tank (UST) installations and/or closures, and fire prevention inspections pertaining to the subject property were requested. With the exception of a 1973 construction appraisal report for the Plymouth Tube Company, this office was unable to identify any records concerning the subject property. The aforementioned report presented the results of an appraisal of the two main buildings located on the subject property in 1973 (see Appendix C). These buildings included the existing warehouse, which was at that time occupied by the Plymouth Tube Company, and the former ALCO power house, occupied by Cenedella Wood Products.

According to the appraisal report, prepared by Cole-Layer-Trumble Company of Dayton, Ohio, the former power house, or Cenedella building, was erected in 1909, and was used for wood working operations in 1973. This is consistent with information obtained from city directories which indicated that Cenedella manufactured wooden boxes and crates. The report also indicated that the Plymouth Tube Co. building complex was erected in 1910. At the time of the appraisal, the Plymouth Tube building complex consisted of: (1) a strip shop and offices in the western end; (2) a cold drawing shop in the central bay with additions including a neutralizing room, lime storage area, and pickling house; and (3) a manufacturing area in the southern bay. The floors of this building complex primarily consisted of reinforced concrete slabs, although 4-inch wood block flooring was present in a portion of the central bay. Lastly, the appraisal report also indicated the presence of a gate house and X-Ray building on the subject property. The latter structure was located to the east of the Plymouth Tube building.

According to notes which were hand written on the site plan included in the appraisal report, the Cenedella building was razed in 1989 along with several additions to the Plymouth Tube building.

5.0 PREVIOUS ENVIRONMENTAL STUDIES/INVESTIGATIONS AND REMEDIAL ACTIONS

Available reports summarizing environmental studies, investigations and remedial actions performed on the subject property and/or adjacent properties were reviewed by CHA. The majority of the reports acquired pertain to the former Roblin Steel site located adjacent to the subject property. These off-site reports were reviewed for information concerning the history of the overall industrial complex, as well as operations and/or conditions on the adjacent properties which may have negatively influenced the subject property. The following sections summarize information obtained from these reports.

5.1 ON-SITE REPORTS

5.1.1 ASBESTOS SURVEY

A report summarizing the results of an asbestos survey of the on-site warehouse building and eastern block building was provided by the current owner. The survey was performed by Fibertech Environmental Services of Erie, Pennsylvania in March, 1997. According to the report and certifications provided therein, Fibertech is a New York State Department of Labor licensed asbestos contractor. Samples of suspected asbestos containing materials (ACMs) were collected by Fibertech and analyzed via Polarized Light Microscopy (PLM) by Enviro Techniques, Inc. of Paterson, New Jersey, which is a New York State Department of Health certified laboratory.

Over 50 samples of suspected ACMs were collected and analyzed during the course of the Fibertech survey. The resulting laboratory data indicate the presence of the following ACMs:

- Pipe insulation on two, four and six inch diameter pipes located throughout the warehouse building;
- Gray exterior siding on the south bay area of the warehouse;

- Tan piping above the former office area of the warehouse building; and
- Boiler insulation on the two boiler units located within the south bay and former office area of the warehouse.

The condition and estimated quantity of these materials was not identified in the report. None of the other materials tested, including roofing materials from both buildings, were found to contain asbestos. The Fibertech report is presented in its entirety in Appendix D.

5.2 OFF-SITE REPORTS

5.2.1 ENVIRONMENTAL SITE REVIEW

A January, 1989 report entitled *Environmental Site Review of Roblin Steel Plant Site, Dunkirk, New York*, prepared by Acres International Corporation on behalf of the Chautauqua County Industrial Development Agency, was reviewed for information concerning the history and condition of the adjacent former industrial facility site. This report indicated the following:

- The Roblin Steel site and subject property were part of a larger industrial complex originally occupied by the Brooks Locomotive Works, which later became the American Locomotive Company.
- Tax maps obtained by Acres indicated that Edgewood Investments, Inc. owned approximately 14.5 acres of the industrial park situated east of South Roberts Road, referred to as the Progress Park complex. In addition to the industrial concerns listed above and Roblin Steel, other companies which currently, or at one time, used portions of the Progress Park complex included Alumax, Plymouth Tube, Dunkirk Ice Cream, and the Edgewood Group.
- A 1980 sketch of the Progress Park complex showed to buildings on the subject property including the existing warehouse building and former ALCO power building. The existing warehouse was occupied by Plymouth Tube, while the power building to the south was occupied by Cenedella.

- The Roblin Steel facility was a generator of hazardous waste listed as K061, which pertains to emission control dust or sludge from the primary production of steel in electric furnaces.

- Oil and potential oil contamination were present in many areas of the Roblin property, including soil, groundwater, and bedrock. Furthermore, oil spills were reportedly allowed to flow onto adjacent properties and into the storm sewers.

- Potential PCB-containing transformers were present on the northwestern portion of the Roblin Steel site, southeast of the subject property. Oily liquids were noted to have been leaking from these transformers onto a gravel surface. Additionally, undocumented rumors of PCB dumping on the property northwest of the Roblin Steel site, which could potentially be the subject property, were recorded.

- Emission control dust, a listed hazardous waste generated by the Roblin Steel facility, was noted in many areas of the Roblin Steel site and adjoining property. This included drummed waste located inside the plant building, and exterior areas of probable land disposal.

- All persons interviewed indicated the absence of any underground storage tanks (USTs) on the Roblin Steel site. However, historical maps indicated the presence of an oil cellar, three oil storage tanks, and pickling tanks on the Roblin site.

The Acres report concluded that the potential for environmental contamination encompassing several different environmental media exists at the Roblin Steel site, and recommended that further investigation of the site be performed to characterize the type and extent of contamination at the site.

5.2.2 PHASE II ESA

Dunn Geoscience Corporation completed a Phase II ESA of the Roblin Steel site in 1990 on behalf of Alumax Extrusions, Inc., who was considering purchasing the site for expansion of their adjacent facility. A draft report summarizing the results of this investigation was obtained from the NYSDEC.

The scope of the Phase II ESA completed by Dunn included the sampling and analysis of sediment and water contained within the Roblin Steel site's storm sewer system, as well as potential ACMs used in the construction of the Roblin buildings. Additionally, a series of test borings and test pits were installed to enable the characterization of physical and chemical subsurface soil conditions. The results of these efforts indicated the following:

- Soils on the Roblin Steel site consist of a heterogeneous mixture of fine-grained glacial deposits ranging from clayey silts to silty clay units with various percentages of coarse to fine sand and gravel. With the exception of one boring location, the subsurface profile contained relatively little fill material (2-4'). Overburden thickness increases from east to west. Shale bedrock was encountered in the borings at depths ranging from 2.5' to 14.2'.

- Groundwater was encountered at 4.5' below the ground surface.

- The concentration of volatile and semi-volatile organic compounds, PCBs, and metals in sewer sediment and/or water exceeded selected regulatory standards at seven of the eight catch basins sampled.

- The sewer system intercepts significant groundwater flow. Therefore, the contamination in the sewer water was considered indicative of groundwater contamination.

- Semi-volatile organic compounds were detected in subsurface soil samples collected from across the site at concentrations which exceed selected regulatory standards.

- Samples collected from test pits excavated in former pits and sub-basements, as well as in areas of suspected previous spills, contained concentrations of volatile and semi-volatile organic compounds and metals that exceeded selected regulatory standards. The presence of PCBs was also detected in three of the seven test pits sampled.

- The relatively shallow depth to bedrock indicates the potential for contaminant migration into the bedrock aquifer.

- Significant quantities of ACMs, including galsbestos and transite siding and roof panels, were identified in association with the Roblin buildings.

5.2.3 GROUNDWATER ASSESSMENT

A groundwater assessment, involving the drilling and sampling of eight monitoring wells, was performed at the Roblin Steel site by Harrison Hydrosciences in 1991. This assessment was performed on behalf of Alumax, Inc. in association with the potential acquisition of the Roblin site for expansion of the adjacent Alumax facility. The report summarizing this groundwater assessment was obtained from the NYSDEC and was reviewed for information concerning groundwater quality and flow directions on the Roblin site, situated adjacent to the subject property.

Based upon the report prepared by Harrison Hydrosciences, the depth to bedrock ranged from 2-13 feet below ground surface, with the greatest depth being in the northwestern corner of the Roblin site. Groundwater data presented in the report indicated that groundwater occurs at depths ranging from approximately two to seven feet below the ground surface, and flows to the northwest. Based upon this information, the subject property is located directly down-gradient of the Roblin Steel site.

Analytical results contained in the report indicate the presence of several volatile organic compounds in five of the eight wells installed on the Roblin Steel site, including two wells that are located in close proximity to the southeastern property boundary of the subject site. The compounds detected, including trichloroethene (TCE) and degradation products thereof, were linked to the potential use of chlorinated solvents at the Roblin Steel facility. TCE has a specific gravity of greater than 1.0, signifying that it is denser than water and, if spilled on the ground in quantities great enough to overcome the residual saturation, the pure phase may migrate vertically downward through an aquifer. TCE is also relatively soluble and can migrate as a dissolved phase with flowing groundwater.

Numerous semi-volatile organic compounds were also detected in one well positioned down-gradient of the Roblin Steel building. These compounds are characterized by relatively low

solubility and mobility. Potential sources of this contamination identified in the Report include tar, creosote and heavy oil.

After reviewing the above referenced report, the NYSDEC issued a number of comments relating to deficiencies in the design and construction of the monitoring wells installed by Harris Hydrosciences, as well as the sampling protocols they utilized. The NYSDEC also indicated that the monitoring wells were not installed to sufficient depths to investigate the potential presence of Dense Non-Aqueous Phase Liquid (DNAPL).

5.2.4. CERCLA REMOVAL ACTION

The U.S. Environmental Protection Agency (EPA) completed a Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Removal Action at the Roblin Steel site in May, 1994. This Removal Action was undertaken to address the presence of over 700 drums containing various types of hazardous wastes, as well as waste piles containing K061 wastes, on the Roblin Steel site under conditions which posed a threat to public health and the environment.

The following materials were removed from the site during the course of the Removal Action for proper treatment and/or disposal at appropriately permitted off-site disposal facilities:

- 160 tons of K061 Solids
- 688 Empty Drums
- 3,544 Gallons of K061 Liquids
- 1,865 Gallons of K061 Oils
- 20 Cubic Yards of K061 Debris
- 330 Gallons of PCB Oil
- 0.5 Tons of PCB Contaminated Equipment
- 110 Gallons of Acids
- 275 Gallons of Asbestos (Solid)
- 55 Gallons of Pesticide
- 55 Gallons of Carbon Disulfide
- 165 Gallons of Flammable Liquid

Prior to the removal of these materials, it was noted that at least 50-100 of the drums containing liquid wastes were either damaged, visually near the point of release, or leaking. Other mechanisms for the release of hazardous waste identified by the EPA included storm water runoff from piles of K061 wastes present at the site. Poor housekeeping and improper storage practices were cited by the EPA as the likely source of past releases at the site. Following the completion of the Removal Action, the EPA recommended that the site be subjected to a Preliminary Assessment for potential ranking on the National Priorities List (NPL).

5.2.5 SOIL/SLAG SAMPLING AND ANALYSIS

Under contract to the EPA, Roy F. Weston, Inc. completed a sampling and analysis program at the Roblin Steel site in January, 1994 to characterize the range of heavy metals contamination in piles and containers of K061 wastes. Post excavation soil samples were also collected from areas where K061 wastes had been previously staged prior to removal from the site, and other samples were collected from suspected areas of contamination throughout the site for metals analysis. Lead was identified as the primary indicator contaminant to be used for determining removal actions at the site.

The resulting data were compared with a 1,000 ppm clean-up criteria for lead. This clean-up level was selected by Roy F. Weston, Inc. for unknown reasons, and may not represent the applicable regulatory clean-up level for lead. Based upon the data, several areas exhibited lead concentrations greater than the stated clean up criteria, including an area situated just to the southeast of the subject property, where post excavation levels averaged over 2,000 ppm. According to the NYSDEC, background concentrations of lead in the eastern United States range from 4-61 ppm.

5.2.6 SUMMARY

Based upon the reports of several environmental investigations of the adjacent former Roblin Steel site, contamination exists at the Roblin site in a number of environmental media, including soil, groundwater and sewer sediments/water, resulting from historic operations, past spills and the on-site surface disposal of hazardous air emission control dust. Groundwater data contained within these reports indicates that the subject property is situated hydrologically downgradient of the former Roblin site. Therefore, the potential for contaminant migration from the former Roblin site onto the subject property is a potential concern.

6.0 STATE AND FEDERAL RECORDS REVIEW

Standard State and Federal record sources for the subject property and the properties occurring within the approximate minimum search distances established in ASTM Practice E-1527 were reported by the Environmental Risk Information and Imaging Service (ERIIS). The following sections discuss the results of this record search, while the entire ERIIS report is presented in Appendix E. Additionally, records held by local (e.g., county, city, etc.) agencies were reviewed and are discussed in Section 6.2.

6.1 STATE AND FEDERAL RECORDS

6.1.1 INACTIVE, UNCONTROLLED OR ABANDONED HAZARDOUS WASTE SITES

The subject property does not appear on the USEPA National Priorities List (NPL) of hazardous waste sites (June 1997), the USEPA Comprehensive Environmental Response, Compensation and Liability Information System (CERCLIS) database (June 1997) the No Further Remedial Action Planned (NFRAP) Report (April 1997) or the New York Inactive Hazardous Waste Disposal Site list (April 1996). However, the following sites were identified within the minimum search distances specified for these databases:

- The Dunkirk Landfill located 0.90 miles to the southeast of the subject property is included on the list of New York State Inactive Hazardous Waste Disposal Sites. This closed landfill is categorized as a Class 3 site by the NYSDEC, signifying that it does not pose a significant threat to public health or the environment, and that corrective action may be deferred. The Dunkirk Landfill is also listed in the NFRAP report. NFRAP sites may be sites where, following an initial investigation, no contamination was found, contamination was removed quickly without need for the site to be placed on the NPL, or the contamination was not serious enough to require federal superfund action or NPL consideration. Given the classification of this site and its distance from the subject property, it does not appear to constitute a threat to the environmental integrity of the subject property.

- The former Roblin Steel site, which bounds the subject property to the southeast, is listed in the NFRAP report. This site was listed as unplottable by ERIIS, and therefore does not appear in the statistical profile or corresponding map included in Appendix E. According to the NFRAP database, the EPA completed a preliminary assessment of the former Roblin Steel site in February, 1995 to determine its eligibility for inclusion on the National Priority List (NPL). As noted in Section 5.0, this site was the subject of several environmental investigations in the early 1990s, as well as a CERCLA Removal Action in 1994. The results of these previous environmental investigations indicated that soil and groundwater at the former Roblin Steel site are contaminated, and that the subject property is situated directly down-gradient of the Roblin Steel site with respect to groundwater flow direction. Therefore, contaminant migration from the former Roblin Steel site onto the subject property is a potential concern.

6.1.2. HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES

Review of the RCRA Treatment, Storage and Disposal Facilities (TSDF) Report (April 1997) indicated that no such facilities exist on or within a 1.0 mile radius of the subject property.

6.1.3 HAZARDOUS WASTE GENERATORS

The property investigated for this report does not appear on the USEPA Resource Conservation and Recovery Information System (RCRIS) list of hazardous waste generators (April 1997). However, review of the listing indicated that three properties located within 0.25 miles of the subject property are listed as large quantity hazardous waste generators. Large quantity generators either generate more than 1000 kg of hazardous waste per month, or meet other applicable requirements of RCRA. The following large quantity hazardous waste generators were identified:

- Alumax Extrusions, Inc. located southeast of the subject property reportedly generated multiple types of hazardous waste, including chromium and spent halogenated solvents, during its operation. This facility is located up-gradient of the subject property, but is currently inactive. As such, the Alumax site is not considered a current threat to the environmental integrity of the subject property. However, the RCRIS database indicates that the Alumax facility was the subject of an enforcement action resulting in a monetary penalty in 1987. Therefore, past activities at the Alumax facility may have been the source of environmental concern relative to the subject property.

- Roblin Steel Industries located adjacent to, and southeast of, the subject property reportedly generated hazardous air pollution emission control dust during its operation. As previously noted, the Roblin site has been inactive for approximately ten years, and has been the subject of an EPA removal action and environmental investigations that have identified soil and groundwater contamination. Contaminant migration from the former Roblin Steel site onto the subject property is a potential concern.

- Dunkirk Radiator Corporation located north of the subject property, on the opposite side of the railroad yard that bounds the subject property to the north, is listed as a large quantity hazardous waste generator. Based upon the location of this site cross-gradient from the subject property with respect to groundwater flow direction, the Dunkirk Radiator site is not viewed as a source of environmental concern relative to the subject property.

- East Dunkirk #63 Sub located approximately 0.25 miles southeast of the subject site. This site was listed as unplottable by ERIIS, and therefore does not appear in the statistical profile or corresponding map included in Appendix E. According to the RCRIS database, this site is not listed in the RCRA Administrative Action Tracking System (RAATS), nor has it been the subject of any corrective actions. Therefore, this site is not considered a threat to the environmental integrity of the subject property.

In addition to the above listed large quantity hazardous waste generators, one small quantity generator is located approximately 0.25 miles north of the subject property. This site, Reid Petroleum - Yellow Goose was listed as unplottable by ERIIS, and therefore does not appear in the statistical profile or corresponding map included in Appendix E. This site is located down-gradient of the subject property, and, therefore, is not viewed as an environmental threat to the subject property.

6.1.4 PETROLEUM AND CHEMICAL BULK STORAGE TANKS/FACILITIES

Review of the New York Petroleum Bulk Storage (PBS) Tank Report (June 1997) indicated that no PBS facilities occur on subject property. Further review of this database indicates that four PBS facilities are located within a 0.25 mile radius of the subject property. These PBS sites are listed and briefly described below:

- Ellmans Garage located south of the subject property is listed as having two active 3,000 gallon gasoline USTs. The distance of this site relative to the subject property was further

investigated and was found to be more than 0.5 miles, or outside of the required search radius for this database. Considering the distance and position of Ellmans Garage cross-gradient from the subject property relative to groundwater flow direction, this site is not considered a threat to the environmental integrity of the subject property.

- Alumax Extrusions, Inc. located to the southeast of the subject property is listed as having had one 10,000 gallon diesel UST removed. The UST was reportedly installed in 1986, and was removed in December, 1993 according to NYSDEC records.

- The Talcott Street Warehouse located within 1,000 feet southwest of the subject property is listed as having had four fuel oil USTs with a combined storage capacity of 62,000 gallons. According to the PBS database, all of these tanks have been closed and/or removed. Considering the inactive status of this PBS site and its cross-gradient position relative to the subject property, the Talcott Street Warehouse site does not appear to constitute a source of environmental concern with respect to the subject property.

- The Dunkirk Yellow Goose retail gasoline station is located approximately 0.25 miles north of the subject property and contains five active gasoline USTs with a combined capacity of 22,000 gallons. This site is listed as unplottable by ERIIS, and therefore does not appear in the statistical profile or corresponding map included in Appendix E. Based upon its down-gradient position relative to the subject site, this gas station does not present an environmental threat to the subject property.

The New York Chemical Bulk Storage (CBS) Report (June 1997) was also reviewed to identify the presence or absence of facilities that store regulated substances on or within a 0.25 radius of the subject property. According to this report, no CBS facilities occur on the subject property. However, two CBS facilities were identified within the aforementioned minimum search distance and are described below:

- Alumax Extrusions, Inc. reportedly contains one inactive 5,000 gallon above ground storage tank (AST) formerly utilized for the storage of a single unidentified hazardous substance. This tank was closed in-place according to the CBS database. Based upon its inactive status, this CBS facility is not considered to represent a current threat to the environmental integrity of the subject property.

- The Talcott Street Warehouse located within 1,000 feet southwest of the subject property is listed as having one active 900 gallon AST containing a single hazardous substance. This CBS facility is located cross-gradient from the subject property with respect to groundwater flow direction, and, therefore, does not pose an environmental concern relative to the subject property.

Review of the New York Major Oil Storage Facilities Report (June 1997) indicated that no facilities with petroleum storage capacities in excess of 400,000 gallons exist on or within a 0.25 mile radius of the subject property.

6.1.5 HAZARDOUS SUBSTANCE AND PETROLEUM RELEASES

A review of the Emergency Response Notification System (ERNS) (June 1997) indicated that there have been no sudden or accidental releases of hazardous substances or petroleum reported on the subject property or within a 0.05 mile radius between January 1, 1997 and June 11, 1997. Furthermore, no hazardous materials spills were reported on the subject property or within a 0.5 mile radius based upon the New York Spills Report (June 1997). Spill records maintained by the local NYSDEC office and field office are discussed in Section 6.2.2.1.

6.1.6 ACTIVE SOLID WASTE FACILITIES

Review of the New York Solid Waste Facility (SWF) Register (December 1996) indicated that no active solid waste facilities occur on the subject site. A mixed solid waste landfill, however, was identified within 0.5 miles of the subject property and is listed by ERIIS as an unplottable solid waste facility. According to the SWF register, this landfill is associated with the Dunkirk Radiator site located north of the railroad yard that bounds the subject property to the north. This site has not been included in the statistical profile or corresponding map presented in Appendix E due to its status as unplottable. Based upon its cross-gradient position relative to the subject property, this landfill is not considered to represent a threat to the environmental integrity of the subject property.

6.1.7 LEAKING STORAGE TANKS

According to the New York Leaking Storage Tanks Report (June 1997), there are no unresolved leaking storage tank sites reported on or within a 0.5 mile radius of the subject property.

6.2 LOCAL AGENCY RECORDS REVIEW AND INTERVIEWS

6.2.1 CITY OF DUNKIRK

6.2.1.1 Building/Zoning Office

The City of Dunkirk Housing, Building and Zoning Officer, Allan L. Zurawski, was requested to provide available records pertaining to recognized environmental conditions in connection with the subject property. Specific items requested included records or permits concerning the installation and removal of USTs and ACTS; facility inspection records; and other information relating to complaints or incidents involving hazardous waste or petroleum usage, storage or releases at the subject property. Mr. Zurawski indicated that his office has only maintained records of UST installations and closures since 1992, and does not have any such records for the subject property. Mr. Zurawski also indicated that his office does not have any other records relating to the requested information concerning the subject property.

6.2.1.2 Fire Department

Personnel at the City of Dunkirk Fire Department were interviewed by CHA concerning the local fire department's records relative to the occurrence of USTs or ACTS, spills, or discharges of hazardous waste or petroleum on the subject property. They indicated that the fire department did not have any records, including fire prevention inspection reports or tank registrations, pertaining to the subject property. One of the officers interviewed, however, did recall the presence of acid

tanks along the southern side of the warehouse building which were associated with pickling operations at the former Plymouth Tube facility.

6.2.1.3 Department of Public Works

A representative of the City of Dunkirk Department of Public Works (DPW), Mr. David Manzella, indicated that his office does not maintain records relative to UST or AST installations and removals, or environmental complaints or incidents. He also indicated that he was unaware of the existence of any old plans or drawings of the subject property in the DPW's files which might provide information concerning previous site operations or chemical/petroleum use and storage.

6.2.2 CHAUTAUQUA COUNTY

6.2.2.1 Environmental Health Department

Mr. Michael Vendette of the Chautauqua County Health Department, Environmental Division was interviewed concerning his knowledge of recognized environmental conditions in connection with the subject property. Mr. Vendette is also a member of the CHAUTAUQUA County Hazardous Material Team, and is the local NYSDEC field agent. Mr. Vendette was quite familiar with the subject property and adjacent industrial complex, and during a walk through of the site provided the following information:

- Approximately ten years ago, during the demolition of the former ALCO power house and Cenedella Wood Products building on the southwest corner of the property, a petroleum spill occurred in the basement of the building and entered the storm sewer running beneath South Roberts Road. The spill migrated through the sewer to Lake Erie where it was discovered and reported. Mr. Vendette was involved in the spill response efforts which included the pumping of product from the storm sewer, placement of absorbent booms at the point of discharge to Lake Erie, and the closure of the piping leading from the basement source area to the storm sewer. Mr. Vendette indicated that the suspected source

of the petroleum was one or more oil tanks of unknown size located in the basement of the building and damage as a result of demolition activities. Mr. Vendette could not recall whether the oil tanks from which the spill emanated were removed from the basement or closed in place, but did indicate that the spill was not suspected to have impacted soil or groundwater conditions. Mr. Vendette also indicated that the building contained several transformers, numerous containers of chemicals, and asbestos waste. Although the transformers and chemicals were removed prior to the completion of the building demolition, Mr. Vendette indicated that he suspected that the asbestos waste was buried on-site within the building footprint during the demolition.

- While occupied by the Plymouth Tube Company, sulfuric acid was utilized in the warehouse building to clean the tubes. Mr. Vendette suspected that the acid room was formerly located along the south side of the building, near the eastern end.

- Many unreported spills occurred on the subject property.

- The adjacent former Roblin Steel facility generated hazardous air pollution emission control dust, some of which was improperly deposited on the Roblin Steel site. Numerous other environmental problems were identified on the former Roblin Steel site including petroleum spills, elevated concentrations of lead in soil in several areas, and the presence of numerous drums of liquid wastes. Mr. Vendette indicated that the drums of waste and piles of hazardous baghouse dust were removed by the EPA, but that residual contamination exists on the former Roblin site in on-site fill, soil and groundwater.

Mr. Vendette suggested that the County Environmental Health Department files be reviewed to provide more information on the subject property, and provided the name of a past foreman of the Plymouth Tube Company for a potential interview.

Spill records maintained by the County Health Department were reviewed for information concerning incidents reported on the subject property and adjacent properties. These records indicated the following:

- A file concerning the on-site petroleum spill which originated in the basement of the former ALCO power house and Cenedella Wood Products building confirmed information provided by Mr. Vendette and described above. According to this file, the spill occurred in October, 1988 and was designated NYSDEC Spill No. 8806044. Incident reports indicated that smoke testing of the storm sewer confirmed that the spill was emanating from a raceway in the basement of the aforementioned on-site building, and identified a

damaged tank as the potential source of the petroleum. The file contained a NYSDEC memo dated May 17, 1990 which indicated that this spill file was to be closed.

- A petroleum spill occurred on the adjacent Roblin Steel site in January, 1987. This #2 fuel oil spill (NYSDEC No. 861027) originated from an AST located on the southern side of the Roblin facility where stained soil was observed in two locations.

- Several spills were reported on the Alumax Extrusions, Inc. site, including a July, 1987 spill (NYSDEC No. 8703629) of 30 gallons of diesel fuel from the fuel tank of a truck, and a sodium hydroxide spill (NYSDEC No. 9200526) from an AST located on the northern side of the Alumax facility.

Region 9 NYSDEC records indicate that the status of all of these spills is closed, signifying that they were satisfactorily resolved. Region 9 records also indicate that an anonymous caller alleged that acid and waste oil were being dumped on the subject property behind the warehouse in May, 1994 (NYSDEC No. 9402507). Upon inspection of the subject property, however, no evidence of dumping was noted, and the file was given closed status.

7.0 SITE RECONNAISSANCE AND INTERVIEWS

7.1 INTERVIEWS

Interviews of the current owner of the subject property, Mr. William Wells of Edgewood Investments, Inc., and the current site supervisor, Mr. Robert McMinn, were performed on September 25, 1997. Mr. Wells indicated that his company, Edgewood Investments, Inc., purchased the site in the early 1980's for use in warehousing packaging materials, operating supplies and equipment for Dunkirk Ice Cream whose operations were located on Ice Cream Drive in the City of Dunkirk. According to Mr. McMinn, who has been involved with the site since its acquisition by Edgewood Investments, and Mr. Wells, the warehouse building was last occupied by the Plymouth Tube Company which went out of business in 1982. Mr. Wells also indicated that the warehouse building was formerly a machine shop for ALCO prior to becoming the Plymouth Tube Company.

The following information concerning the subject property was provided by to the two Edgewood Investments, Inc. representatives interviewed:

- The warehouse building is not heated, but is connected to the City of Dunkirk potable water and sanitary sewer systems;
- There are no floor drains in the warehouse building;
- To their knowledge, the site does not contain any industrial or potable water supply wells, USTs or ACTS;
- A 350,000 gallon underground brick cistern originally utilized to store water for fire fighting purposes at the ALCO complex is located on the southern portion of the subject property and was filled with gravel at the direction of the City of Dunkirk Fire Department;
- A portion of the floor of the warehouse building was constructed of wooden blocks at the time that Edgewood Investments acquired the property. This floor area was subsequently macademized by Edgewood to accommodate fork lift traffic;

- The small concrete block building located on the subject property to the west of the warehouse is a former scale house;

- The warehouse has been utilized primarily for the storage of packaging supplies, operational supplies and equipment from the former Dunkirk Icecream and current Fieldbrook Farms Dairy facility.

- An asbestos survey of the warehouse building was performed on behalf of Edgewood Investments, Inc. earlier this year (Report was provided by Mr. Wells and discussed in Section 5.1).

In addition to the warehouse building, Mr. Wells related that the site formerly contained a four story building which originally served as the power house for ALCO and was subsequently occupied by Cenedella Wood Products, manufacturers of wooden crates and boxes. This building was located on the southwestern corner of the subject site, along South Roberts Road, and was demolished under contract to Mr. Wells in 1988. Mr. Wells indicated that a minor quantity of oil was spilled into the storm sewer from a heating oil tank located in the basement of the former building during its demolition. With the exception of this spill incident, Mr. Wells and Mr. McMinn indicated that they had no knowledge of any spills, environmental incidents, or contamination on the subject property.

CHA also interviewed a former employee of the Plymouth Tube Company, Mr. Paul Soper, whose name was provided to CHA by Mr. Vendette of the County Health Department. A telephone interview conducted with Mr. Soper on October 7, 1997 revealed that he was the sixteenth person hired by the Plymouth Tube Company and was employed there from 1967 until its closing in 1982 in the capacity of Foreman in the finish department. Mr. Soper indicated that the Plymouth Tube Co. occupied the warehouse building, while the former ALCO power house was occupied by Cenedella Wood Products. Plymouth Tube manufactured stainless steel feedwater heater tubes for heat exchangers, while Cenedella built wooden pallets and crates used by Plymouth Tube to ship their final products.

According to Mr. Soper, the manufacturing process at Plymouth Tube consisted of the welding of flat stainless steel stock into tubes which were cold drawn to the desired length and diameter. In order to clean the raw material and remove oxidation from the tubes after the drawing process, these materials were pickled in a mixture of hydrofluoric and nitric acids. Mr. Soper related that there were two pickling houses at the facility, each of which contained two large ASTs used to store the two types of acid individually. The raw material was pickled along the southern exterior of the building, while the tubes were pickled at the eastern end of the south bay of the building. Mr. Soper indicated that the spent pickling fluids were neutralized on-site with caustic material, and were transported to the City of Dunkirk Landfill on Roberts Road for disposal. Other chemicals used on-site included acetone, cutting fluids, and small volumes of ink for printing specifications on the tubing. According to Mr. Soper, proper housekeeping practices were employed at the Plymouth Tube facility, and he was unaware of any on-site disposal of liquid wastes.

Mr. Soper indicated that the layout of the Plymouth Tube facility was as follows:

- The western portion of the building contained offices and a raw material storage area;
- The center bay of the production area was utilized for finishing operations;
- The north bay was utilized for the cold drawing of smaller diameter tubes;
- Cold drawing took place in the south bay which contained a pickling house at the east end;
- Lavatories, a laboratory, and the Foremans' office were located along the north side of the building; and
- A compressor room with a recessed equipment well was centrally situated on the north side of the building.

Mr. Soper also indicated the presence of a small brick incinerator to the north of the warehouse building, between the building and the railroad tracks. He indicated that this structure was historically used by ALCO, but was not used during his tenure at Plymouth Tube.

Mr. Soper had no knowledge of any USTs on the subject property, but did indicate that numerous pits existed throughout the building. According to Mr. Soper, the wooden block flooring in the building was underlain by up to 18-inches of concrete, and the pits were concrete lined. Mr. Soper had no recollection of transformers inside the building or on the subject property, and was unaware of any PCB spills on the property. Lastly, Mr. Soper indicated that small acid spills occurred frequently at the facility, and that they were typically handled by plant personnel without outside assistance through the use of lime as a neutralizing agent.

7.2 SITE INSPECTION

On September 25, 1997, CHA conducted a comprehensive inspection of the Edgewood Warehouse site located at 320 South Roberts Road in the City of Dunkirk, New York. Photographs of the subject property were taken during this inspection event, and are included in Appendix F. CHA was unable to gain access to the concrete block records room located within the western portion of the warehouse. Therefore, the interior of this room was not examined during the site inspection. Although a flash-light was utilized during the site inspection, poor or non-existent lighting in portions of the warehouse building, particularly the northern annex, also affected the extent to which portions of the warehouse building could be visually inspected. The following sections detail the results of the site inspection.

7.2.1 HAZARDOUS SUBSTANCES/PETROLEUM PRODUCTS (Use, Storage, and Disposal)

Hazardous Substances

No evidence of the storage, use or disposal of hazardous substances or petroleum products was noted on the subject property or within the two on-site buildings.

Underground/Above Ground Storage Tanks

With the exception of one inactive 500-1000 gallon AST being stored in the warehouse building, no evidence of USTs or ACTS was noted on the subject property. The inactive AST observed inside the warehouse appeared to be associated with food processing equipment currently being stored in the building, and was noted to be empty and clean inside.

7.2.2 WASTE EVIDENCE OR MATERIAL WITH THREAT OF RELEASE

Drums or Barrels

Three uncovered 55-gallon drums containing a solid material resembling ash were noted on the eastern portion of the subject property, while five empty 5-gallon containers were observed in the vicinity of the former scale house building. One of these containers originally contained a hazardous substance, styrene, according to its label. Approximately 20-25 empty 5-gallon containers, the majority of which appeared to contain roofing tar residues, were also noted along the northern side of the warehouse building. Additionally, two empty 55-gallon drums were observed in this area. With the exception of several 55-gallon drums utilized as solid waste receptacles inside the warehouse building, no other drums or barrels were observed on the subject property.

Improper Disposal of Solid Waste

Several small piles of debris were observed on the eastern side of the subject property, in the vicinity of the former scale house. These piles appeared to consist primarily of demolition debris, including concrete, steel and bricks. One small piles of potential asbestos containing building materials (e.g., floor tiles, panels, etc.) was also observed adjacent to the former scale house building. Lastly, six used car tires and nine propane gas cylinders were noted along the eastern and southern sides of the warehouse building, respectively.

Stained Soil and Surfaces

Several areas of stained soil and other surfaces were noted on the exterior portion of the subject property. Staining was noted within the curbed concrete area situated along the southern side of the warehouse building. This area may have been utilized by the former Plymouth Tube Company for the pickling of raw materials, based upon an interview with a former employee of the plant. Old plans of the Plymouth Tube Co. also indicate that a neutralizing room was formerly located in the same general vicinity. Multiple areas of stained soil were also observed along the northeastern side of the property, between the warehouse and former scale house buildings. Within this general location, one larger area, measuring approximately 10'x10', and several smaller areas of stained soil were observed.

Minor staining of the concrete floor surface was observed throughout the warehouse building. This staining appeared to be attributable to incidental leakage form equipment stored and utilized within the warehouse, and from historic operations within the building. However, no areas of extensive or concentrated staining were noted within the warehouse building.

Noxious Odors

No chemical or noxious odors indicative of recognized environmental conditions were noted during the inspection of the subject property and buildings located thereon.

Stressed Vegetation

With the exception of some opportunistic weedy vegetation observed along the northern site boundary and an area of manicured lawn located near the entrance from South Roberts Road, the subject property is devoid of vegetation. The weedy vegetation was noted between the warehouse building and railroad yard, and along the northern margin of the open gravel area to the east of

the warehouse. This vegetation is present in the vicinity of the 10' x 10' stained soil area previously discussed, but is absent within the actual limits of this stained area.

Pools of Liquid, Ponds or Lagoons

No pooled liquids, ponds or lagoons were observed on the subject property at the time of the inspection.

Drains, Sumps and Pits

A series of drop inlets designed to receive storm water discharges from down spouts draining the warehouse roof were observed along the southern side of the building. Trench drains were also noted in the recessed loading dock area, in the exterior concrete yard situated along the southern side of the warehouse building, and along the east side of the warehouse building near a former access door. One drop inlet which appears to capture run-off from the asphalt and gravel lot was noted in the southeastern portion of the project site. Significant quantities of sediment were noted in all of these drains, however, no visual evidence of contamination (e.g., sheen, discoloration, etc.) was noted in these structures.

Floor drains were noted in several areas within the warehouse building, including the former office area located in the western end of the building, the former laboratory/stock room located along the northern wall, and in the former maintenance room located in the southeastern corner of the building. The floor of the warehouse building was not visible in many areas of the warehouse due to the presence of the goods being stored. Therefore, other floor drains, pits or vaults may be present in concealed floor areas of the building.

Three covered vaults, pits, or drains were noted on the exterior of the subject property along the northern side of the warehouse building. A fourth vault, pit or drain was noted inside the former

maintenance room situated in the southeastern corner of the warehouse building. All of these structures were covered with solid steel plates that prevented their inspection.

A number of what appear to be former pits that were filled with concrete were noted outside of the eastern end of the warehouse building. Some of these structures may have been associated with the pickling house and lime storage area which were formerly located in this area. Additionally, potential former pits were also observed in the exterior concrete yard located along the southern side of the warehouse building, in the vicinity of the neutralizing room formerly present in this area.

Indications of PCBs

Five column-mounted 25 KVA transformers were noted within the warehouse building, and one column mounted unit was observed in the former scale house building. Five of these units were manufactured by General Electric, while the fifth unit was manufactured by Westinghouse. Additionally, a pallet burdened with two out of service transformers manufactured by General Electric was noted amongst the equipment being stored in the central portion of the warehouse building. No labels indicating the type of fluid contained within any of these transformers were visible. Therefore, there is the potential that these units contain dielectric fluid that contains PCBs.

Two capacitor assemblies were also noted on a pallet in the central portion of the warehouse building. These units were manufactured by Cornell Dubilier and were labeled as PCB containing. The inspection of all of the electrical equipment stored within the warehouse was beyond the scope of this ESA. Therefore, other PCB containing electrical equipment may be stored within the warehouse building.

7.2.3 OTHER CONDITIONS OF POTENTIAL CONCERN

Several exterior concrete structures resembling former equipment or transformer pads were noted during the site inspection. One of these pads was observed near the southeastern corner of the subject property, while another pad was noted to the east of the warehouse building along the northern property margin. No secondary containment curbing was present in association with these structures, however, no pronounced staining was noted on or adjacent to these pads.

Numerous pipes were observed protruding through the base of the exterior northern wall of the warehouse building. These pipes appeared to be potential discharge points for storm water, interior drains, and/or process waste water.

Lastly, a brick incinerator is located along the exterior northern side of the warehouse building. According to a steel plate on the incinerator, it was associated with the operation of the former ALCO plant. The type of material burned in this incinerator, and the method and location of disposal of ash generated therefrom, was not determined during the course of this ESA.

8.0 FINDINGS AND CONCLUSIONS

Based upon information obtained as a result of site observations, interviews, and the review of available regulatory and historical information concerning the subject property and surrounding area, CHA has developed the following summary of conditions and conclusions with respect to recognized environmental conditions.

8.1 SUMMARY OF CONDITIONS

- Based upon historical research, the subject property was developed between 1909 and 1910 as part of a larger industrial complex associated with the expansion of the American Locomotive Company (ALCO) - Brooks Works. The Brooks Works, a locomotive manufacturing facility, was originally established in 1868 to the southeast of the subject property through the conversion of an existing Erie Railroad engine house, and, at the turn of the century, was the largest facility of its kind east of the Mississippi River.

- After 1930, the ALCO facility was converted to enable the manufacturing of military equipment, as well as process equipment consisting mainly of heat exchangers, pressure vessels and pipe.

- The existing on-site warehouse previously housed a tank paint shop, offices, storage facilities, and a machine shop associated with the ALCO complex. Sheet metal fabrication, tube bundle assembly, assembly and testing of heat exchangers, general machining operations, and shot blasting of parts was performed in the machine shop.

- The subject property also contained a second building which housed the ALCO facility power plant, repair shop, semi-works for experimental equipment, and the plant hospital.

- In 1967, following the closure of the ALCO facility four years earlier, the existing warehouse building on the subject property was occupied by the Plymouth Tube Company, manufacturer of stainless steel feedwater heater tubes for heat exchangers. Sometime between 1963 and 1966, the former ALCO power house situated on the subject property became Cenedella Wood Products, manufacturer of wooden crates and boxes utilized to ship final products produced by the Plymouth Tube Co.

- Operations at the Plymouth Tube Co. involved the pickling of raw materials and tubes using a mixture of hydrofluoric and nitric acids at two separate locations. The acids were stored in ASTs, while the spent pickling fluids were neutralized on-site with a caustic material prior to off-site land disposal at the City of Dunkirk Landfill. Small quantity acid spills were reportedly a frequent occurrence at the facility, and were typically handled by plant personnel through the use of lime. Other chemicals used on-site included acetone, cutting fluids, and small volumes of ink.

- A site plan contained within a report summarizing a 1973 appraisal of the Plymouth Tube Co. facility indicated the former presence of an X-Ray building to the east of the existing warehouse building. This building may have contained radiological sources.

- Following the closure of the Plymouth Tube Company in 1982, the existing warehouse building was converted to its present use for the storage of packaging and operational supplies and equipment for the dairy industry. The former ALCO power plant and Cenedella Wood Products building located on the subject property was razed in 1989, by the current property owner, Edgewood Investments, Inc..

- No historical records indicating the presence of USTs on the subject property during its occupation by ALCO, Plymouth Tube Co., and Cenedella Wood Products were noted during this ESA.

- The industrial complex containing the subject property was utilized for the manufacturing of locomotives prior to 1930, and process and military equipment between 1930 and 1963. After 1963, occupants of the adjacent industrial complex have included Roblin Steel Co., who reclaimed high quality scrap steel in two arc furnaces and operated a rolling mill for the production of reinforcing rods until 1987; Dunkirk Lingerie, Inc.; Alumax Extrusions, Inc.; and Allegheny Ludlum Steel.

- There are currently no active facilities within the industrial park containing the subject property. The former Roblin Steel plant site is situated immediately adjacent to, and southeast of, the subject property, while the dormant Alumax Extrusions, Inc. facility lies to the south of the Roblin Steel site.

- The subject property is currently occupied by a 165,000 square foot warehouse building presently utilized for the storage of packaging and operational supplies, and equipment from Fieldbrook Farms Dairy. A second building encompassing approximately 1,000 square feet is located near the northeastern corner of the property, and is presently vacant. This building is thought to be a former scale house associated with the rail access to the industrial complex.

- Land use in the surrounding area is a mixture of industrial and residential properties, with an industrial park situated to the west of the subject property, a railroad yard and industrial facility situated to the northeast of the subject property, and residential areas located to the north and southwest.

- The subject property and neighboring businesses and residents are currently serviced by municipal water and sanitary sewer systems of the City of Dunkirk.

- An asbestos survey of the on-site buildings was completed in March, 1997 on behalf of the current property owner. The resulting report indicated the presence of ACMs in the

warehouse building, including pipe insulation, exterior siding, piping, and boiler insulation.

- A series of environmental investigations were completed at the adjacent former Roblin Steel site. The resulting reports indicated that, while in operation, the Roblin facility generated air emission control dust categorized as a hazardous waste, and that this material had been improperly deposited on the Roblin site. These reports also identified contamination in the Roblin Steel site's storm sewer system, as well as soil and groundwater contamination and the presence of ACMs in the remaining Roblin buildings.

- Other areas of concern identified as a result of the Roblin site investigations included potential PCB-containing transformers, some of which were leaking onto the ground surface; an oil cellar and numerous equipment pits and vaults; undocumented rumors of PCB dumping on the property northwest of the Roblin Site, which could potentially have been the subject property; and oil spills that were reportedly allowed to flow onto adjacent properties and into the storm sewers.

- Groundwater data collected during the investigation of the adjacent former Roblin Steel site indicated that groundwater flow direction is to the northwest toward the subject property.

- In 1994, the EPA completed a CERCLA Removal Action at the former Roblin Steel site to address the presence of over 700 drums of various types of hazardous waste, as well as piles containing hazardous emission control dust (K061 wastes). As a result of this action, solid and liquid K061 wastes, PCB oil and contaminated electrical equipment, acids, pesticides, and flammable liquids were removed from the Roblin site for proper off-site disposal. Prior to the removal of these materials, the EPA indicated that at least 50-100 drums containing liquid wastes were either damaged, visually near the point of release, or leaking; and that storm water runoff from piles of K061 waste was another mechanism for

the release of hazardous wastes present on the site. Poor housekeeping and improper storage practices were cited by the EPA as the likely sources of past releases at the site.

- Under the direction of the EPA, a sampling and analysis program was completed at the Roblin site in 1994 to determine the extent of residual heavy metals contamination in surface soil and fill present on the site. Lead was selected as the primary indicator contaminant. Based upon the resulting data, several areas exhibited elevated lead concentrations (> 1,000 ppm), including an area situated just to the southeast of the subject property.

- A review of standard State and Federal record sources relating to the presence or occurrence of facilities or spill sites involving solid and hazardous waste and petroleum products indicated that no such sites exist on the subject property.

- State and Federal record sources indicate that the two other sites located within the 320 South Roberts Road industrial park, the former Roblin Steel site and the dormant Alumax Extrusions, Inc. facility, are both listed as large quantity hazardous waste generators. The former Roblin site is also listed as an NFRAP site; while the Alumax site formerly contained a 10,000 gallon diesel UST removed in 1993, and currently contains an inactive 5,000 gallon AST formerly utilized for the storage of an unidentified hazardous substance. Because of their proximity to the subject property, their up-gradient position with respect to groundwater flow direction, and their record of enforcement and removal actions, the former Roblin Steel site and inactive Alumax site are viewed as sources of environmental concern relative to the subject property.

- Numerous other sites involving the presence or occurrence of facilities or spill incidents involving solid and hazardous waste and petroleum products were identified within the applicable search radii based upon a review of State and Federal record sources. However, none of these sites are considered to pose a threat to the environmental integrity

of the subject property, based upon their location hydrologically down-gradient or cross-gradient of the subject property; their distance relative to the subject property; or their regulatory status.

- No records indicating the occurrence or removal of USTs or ASTs from the subject property were obtained form local record sources.

- Local record sources indicate that a petroleum spill occurred on the subject property in connection with the demolition of the former ALCO power plant and Cenedella Wood Products building in 1988. According to these records, the suspected source of this spill, which entered the storm sewer extending beneath South Roberts Road via a floor drain in the basement, was one or more tanks damaged during demolition activities. The spill migrated through the storm sewer to Lake Erie, but was not suspected to have impacted soil or groundwater on the subject property. These records also indicate that asbestos waste from the building was potentially buried on-site during the demolition.

- Local record sources also indicate that an anonymous caller alleged that acid and waste oil were being dumped on the subject property behind the warehouse in 1994. Upon inspection of the subject property by regulatory personnel, however, no evidence of dumping was noted and the spill file was given closed status.

- Several spill incidents on the former Roblin Steel site and Alumax Extrusions, Inc. site were also identified during the review of local record sources. These incidents include a 1987 No. 2 fuel oil spill from an AST on the southern side of the Roblin facility where stained soil was observed in two locations; a small quantity diesel fuel spill from the fuel tank of a truck located on the Alumax property in 1987; and a 1992 sodium hydroxide spill from an AST located on the northern side of the Alumax facility. According to Region 9 NYSDEC records, the status of all of these spills is closed, signifying that they were satisfactorily resolved.

- No information indicating the presence of USTs or ASTs on the subject property was obtained as a result of interviews conducted with the current property owner, site manager, and a former employee. Furthermore, no visible evidence of USTs or ASTs was encountered during the inspection of the property.

- Information obtained from interviews indicated that a 350,000 gallon underground brick cistern originally utilized to store water for fire fighting purposes at the ALCO complex is located on the southern portion of the subject property and was filled with gravel at the direction of the local fire department.

- No indications of the storage, handling or disposal of hazardous substances or petroleum products on the subject property were encountered during the site inspection.

- Three uncovered drums containing a solid material resembling ash and five empty 5-gallon containers were noted on the eastern portion of the subject property. Approximately 20-25 empty 5-gallon containers, the majority of which appeared to contain roofing tar residues, and two empty 55-gallon drums were also noted along the northern side of the warehouse building. No other drums or barrels were noted on the subject property.

- Several small piles of debris were observed on the eastern side of the subject property, in the vicinity of the former scale house. These piles appeared to consist primarily of demolition debris, however, one pile of potential ACMs was also observed in this area. Additionally, six used car tires and 9 propane cylinders were noted along the eastern and southern sides of the warehouse building, respectively.

- Several areas of stained soil were noted along the northeastern side of the subject property, between the warehouse and former scale house buildings. Vegetation generally present

in this vicinity was not present within the limits of the spill areas, the largest of which measured approximately 10' x 10'.

- Staining of the concrete surface along the southern exterior of the warehouse building was noted during the inspection. This area may have been utilized by the Plymouth Tube Co. for the pickling of raw materials, based upon an interview with a former employee of the facility. Old plans also indicate that a neutralizing room was formerly located in the same general vicinity.

- Minor staining of the floor surface was observed throughout the warehouse building. The staining appeared to be attributable to incidental leakage from equipment stored and utilized within the building, and from historic industrial usage.

- Numerous storm water drains were observed along the perimeter of the warehouse building, while one storm water catch basin was noted in the asphalt and gravel lot on the southeastern portion of the subject property. Significant quantities of sediment were noted in all of these drains, however, no visible evidence of contamination (e.g., sheen, discoloration, etc.) was noted in these structures.

- Several floor drains and one covered pit or vault was observed inside the warehouse building. Three additional covered pits, vaults or drains were also noted on the exterior of the subject property along the northern side of the warehouse building. All of these structures were covered with solid steel plates that prevented their inspection.

- A number of what appear to be former pits that were filled with concrete were noted along the eastern and southern warehouse exterior. These former pits may have been associated with the pickling houses, lime storage area, and neutralizing room formerly located in these areas.

- Six potentially PCB-containing transformers were observed within the on-site buildings. All of these transformers were 25 KVA column-mounted units, five of which were observed in the warehouse building, while the sixth was noted in the former scale house building.

- Two capacitor assemblies labeled as containing PCBs, and two potentially PCB-containing transformers were noted amongst the equipment being stored in the central portion of the warehouse building. Other out-of-service PCB-containing electrical equipment may also be stored within the warehouse.

- Several exterior concrete structures which may have been transformer pads were noted in exterior locations of the site. One pad was noted near the southeastern corner of the warehouse building, and another pad was observed to the east of the warehouse building, along the northern property margin. Neither of these pads had secondary containment curbing, however, no staining was noted on or adjacent to these structures.

- Numerous pipes were observed protruding from the base of the exterior northern wall of the warehouse building. These pipes may represent current/former discharge points for storm water, interior drains, and/or process waste water.

- A brick incinerator associated with the operation of the former ALCO plant is located along the north side of the warehouse building. The types of material burned in this incinerator and the method and location of disposal of ash generated therefrom are unknown.

- Large quantities of demolition debris were visible to the southeast of the subject property, on the former Roblin Steel site.

8.2 CONCLUSIONS

CHA has performed a Phase I Environmental Site Assessment in conformance with the scope and limitations of ASTM Practice E-1527 of Edgewood Warehouse site located at 320 South Roberts Road in the City of Dunkirk, New York. Any exceptions to, or deletions from, this practice are described in Section 2.0 of this report. This assessment has revealed the following evidence of recognized environmental conditions in connection with the subject property:

- The historical use of the subject property and adjoining industrial park for industrial purposes for nearly 90 years indicates the potential for past discharges of hazardous waste and/or petroleum products to the ground or into structures on or adjacent to the subject property.

- The position of the subject property immediately adjacent to, and hydrologically down-gradient of, the former Roblin Steel site, whereon soil, groundwater and surface fill contamination has been documented, indicates the potential for contaminant migration from the Roblin site onto the subject property via groundwater and surface water runoff.

- Information obtained from interviews indicating the occurrence of numerous historical on-site spills, and the presence of several areas of stained soil on the northeastern portion of the subject property is indicative of the past release of chemicals and/or petroleum on the ground surface of the subject property.

- The presence of numerous pipes of unknown origin protruding from the exterior northern wall of the warehouse building indicates the potential for past waste water discharges to the ground surface of the subject property;

- The on-site presence of three drums containing an unknown solid substance and the documented presence of drums of hazardous air emission control dust on the adjacent

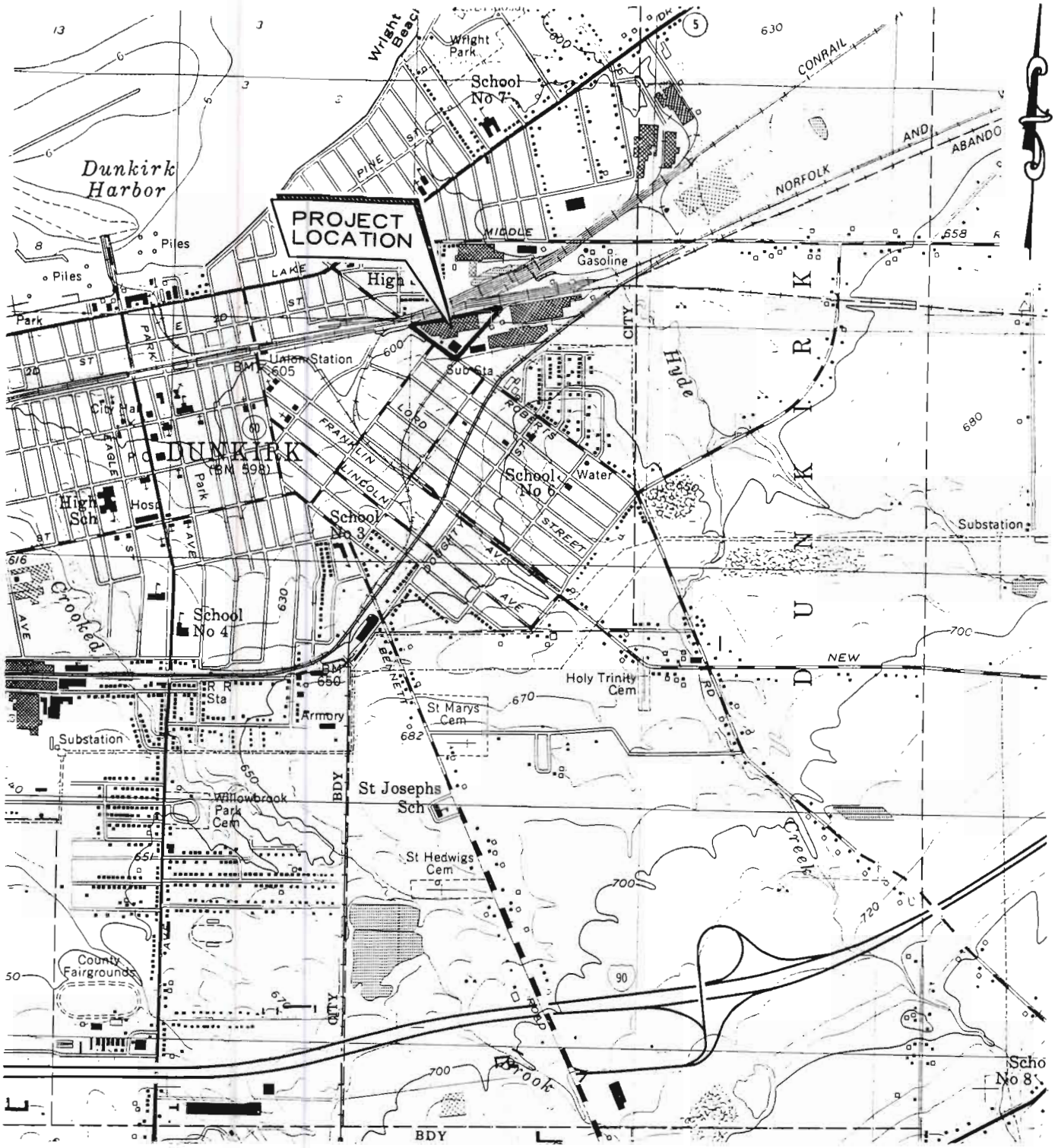
former Roblin Steel site indicates the potential presence of hazardous waste on the subject property; and

- The presence of ACMs of unknown condition within the warehouse building indicates the potential for exposure of warehouse employees to fiber release episodes from friable asbestos.

9.0 LIMITATIONS

The conclusions presented in this report are based on information gathered in accordance with the Scope of Services defined in Section 2.0 of the report. This report is not intended to assess the condition of the subsurface environment at the site. All conclusions reflect observable conditions existing at the time of the site inspection. Information provided by the Chautauqua County offices; City of Dunkirk offices; Soil Conservation Service Office; ERIIS; NYSDEC; USDA; NYSDOT; USGS and USEPA was utilized in assessing the site. The accuracy of the conclusions drawn from this assessment is, therefore, dependent upon the accuracy of information provided.

FIGURES



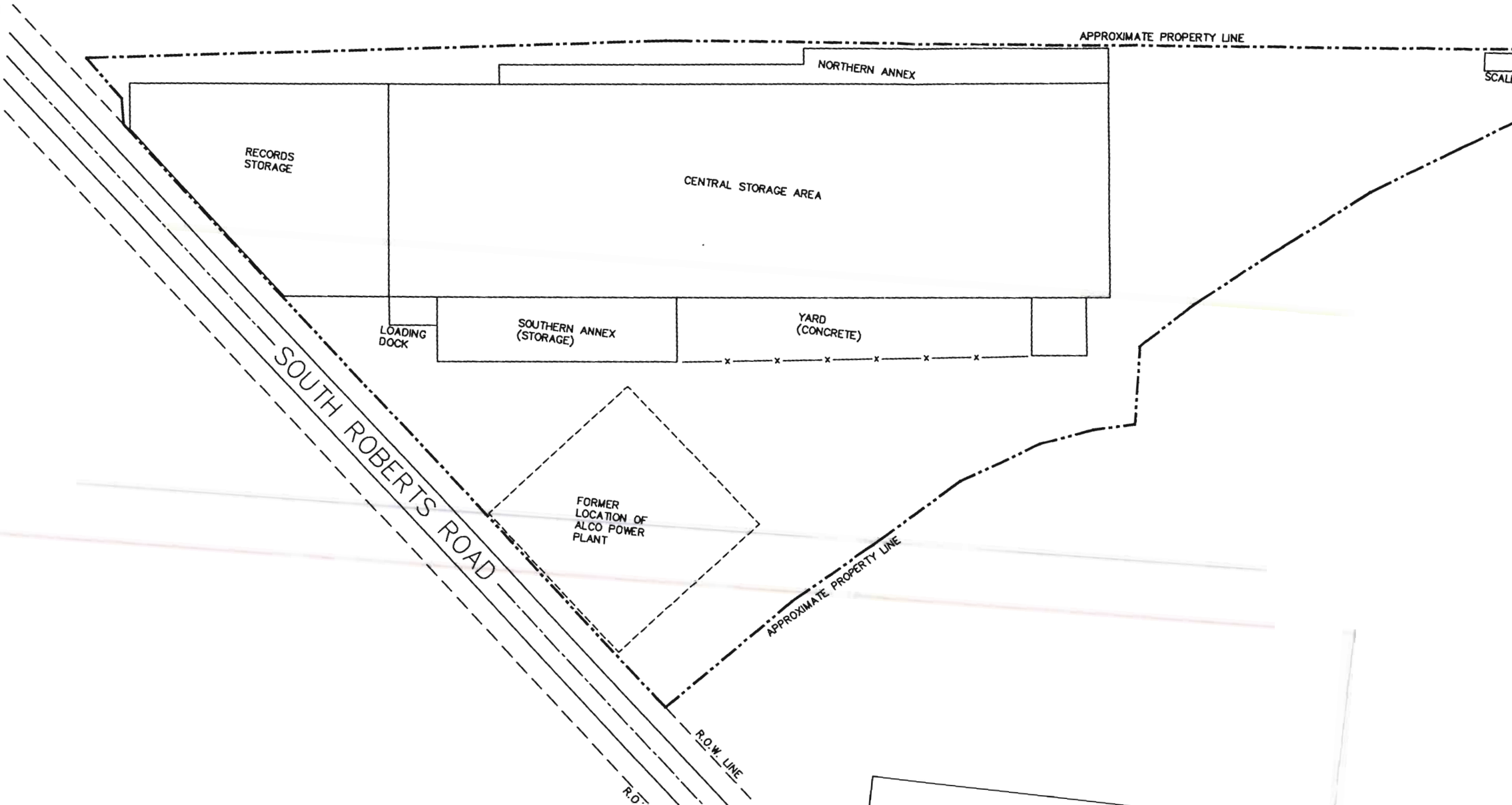
BASE MAP ADAPTED FROM
U.S. GEOLOGICAL SURVEY
DUNKIRK QUADRANGLE - 1979.

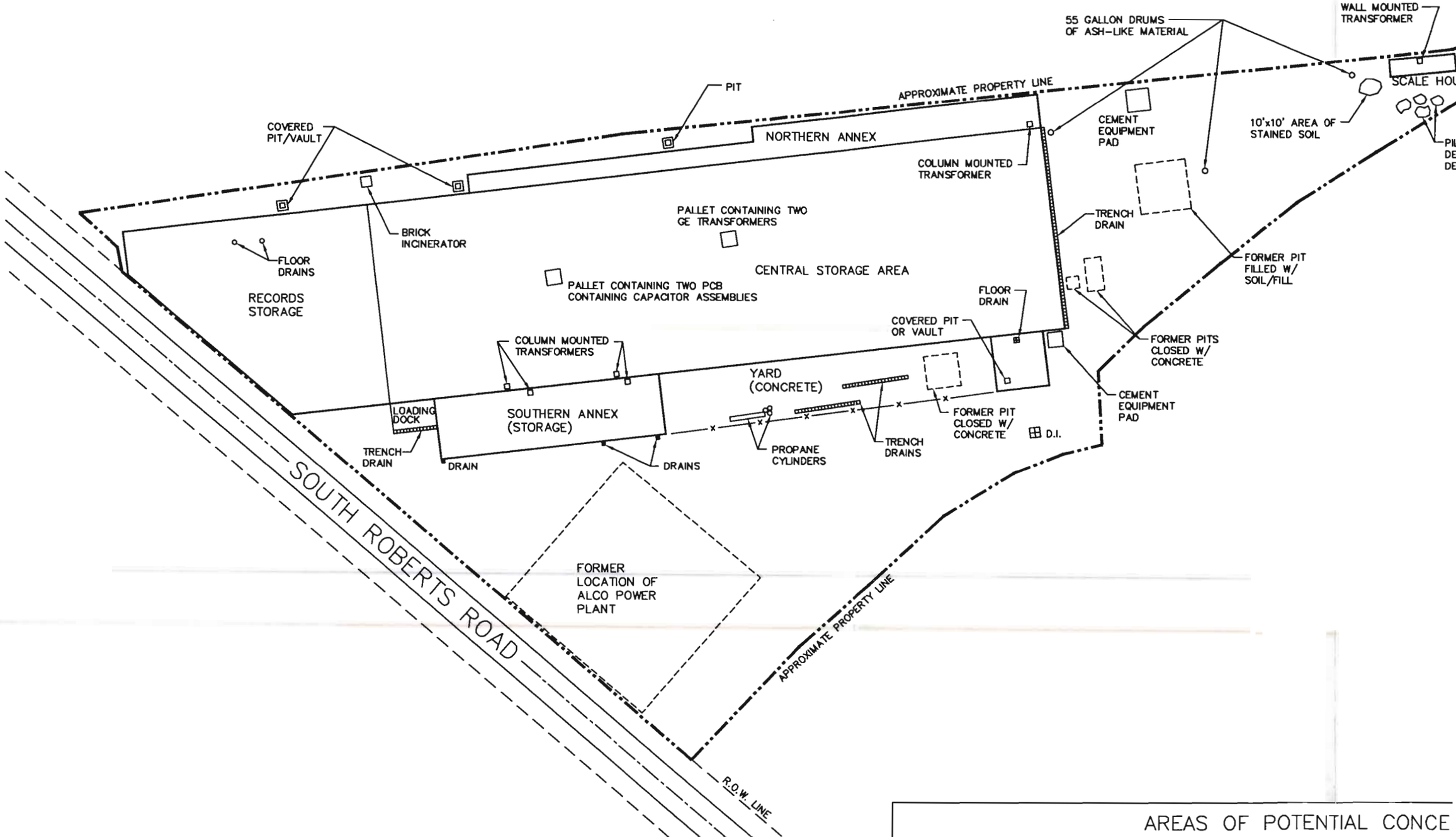
SITE LOCATION MAP

CLOUGH, HARBOUR & ASSOCIATES LLP
ENGINEERS, SURVEYORS, PLANNERS & LANDSCAPE ARCHITECTS

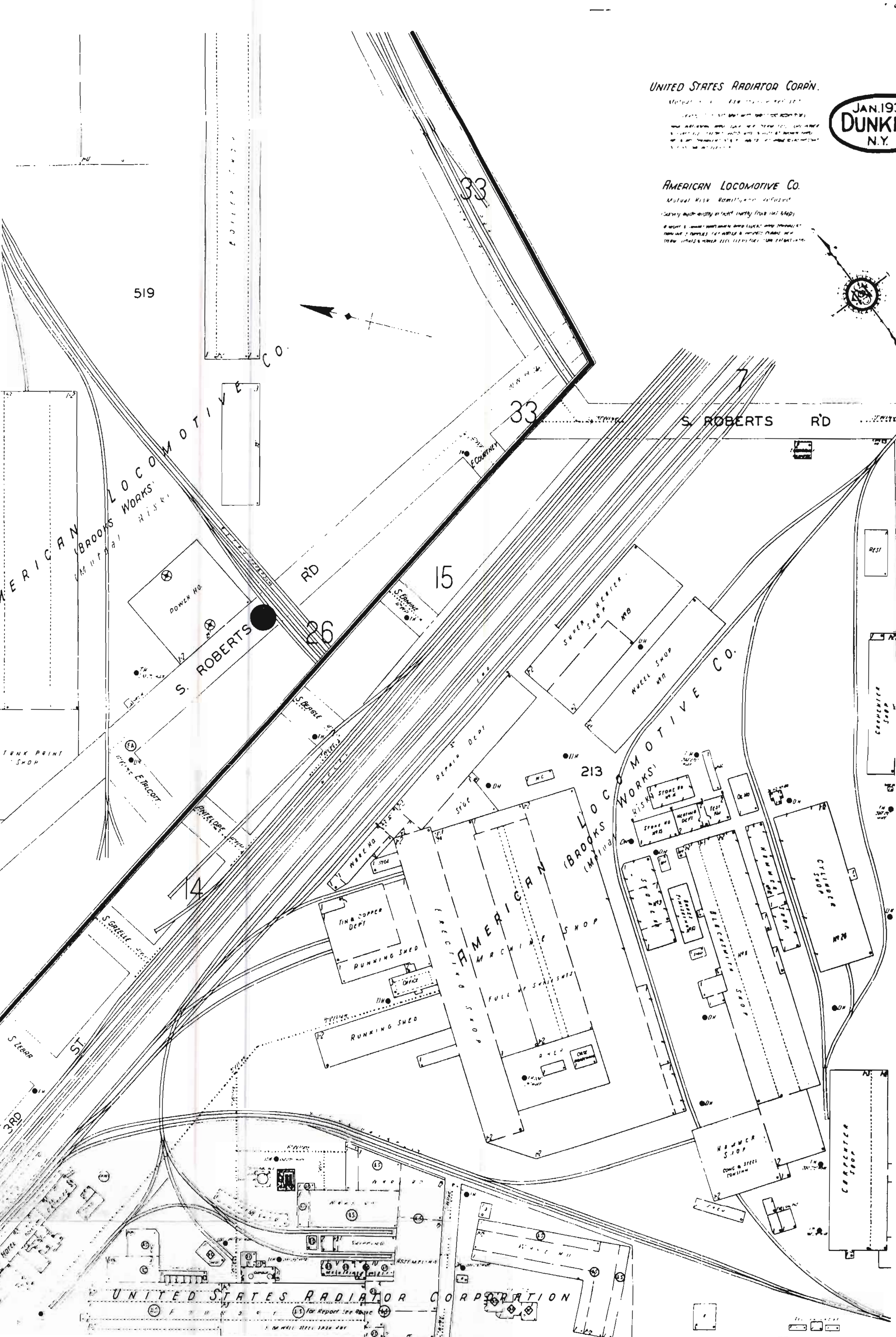
PHASE I ENVIRONMENTAL SITE ASSESSMENT
EDGEWOOD WAREHOUSE
DUNKIRK, NEW YORK

FIGURE NO. 1	SCALE: 1:24,000	PROJECT NO. 6801-07-01	DATE: OCTOBER 1997

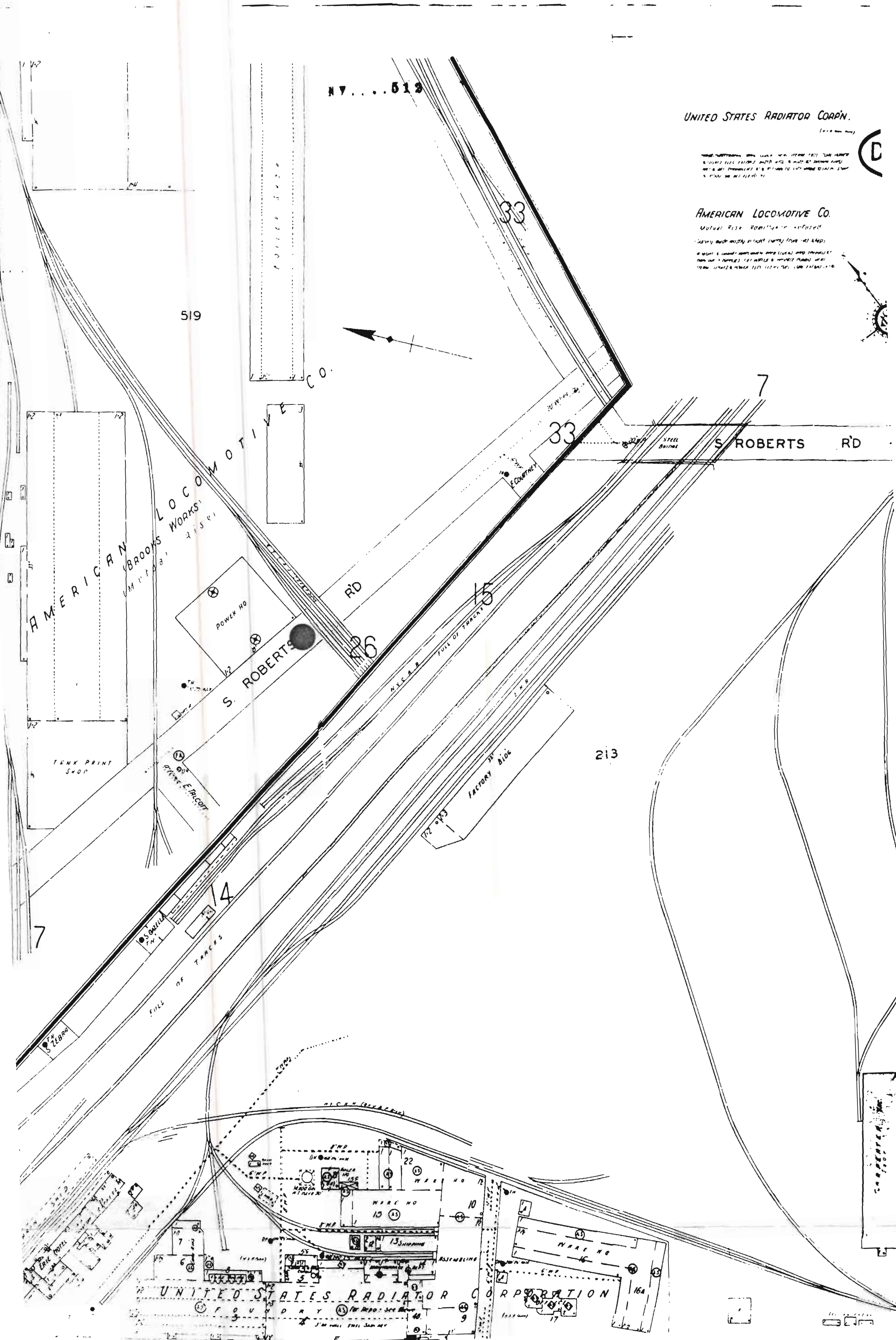

APPROXIMATE PROPERTY LINE
NORTHERN ANNEX
RECORDS STORAGE
CENTRAL STORAGE AREA
LOADING DOCK
SOUTHERN ANNEX (STORAGE)
YARD (CONCRETE)
SOUTH ROBERTS ROAD
FORMER LOCATION OF ALCO POWER PLANT
APPROXIMATE PROPERTY LINE
R.O.W. LINE



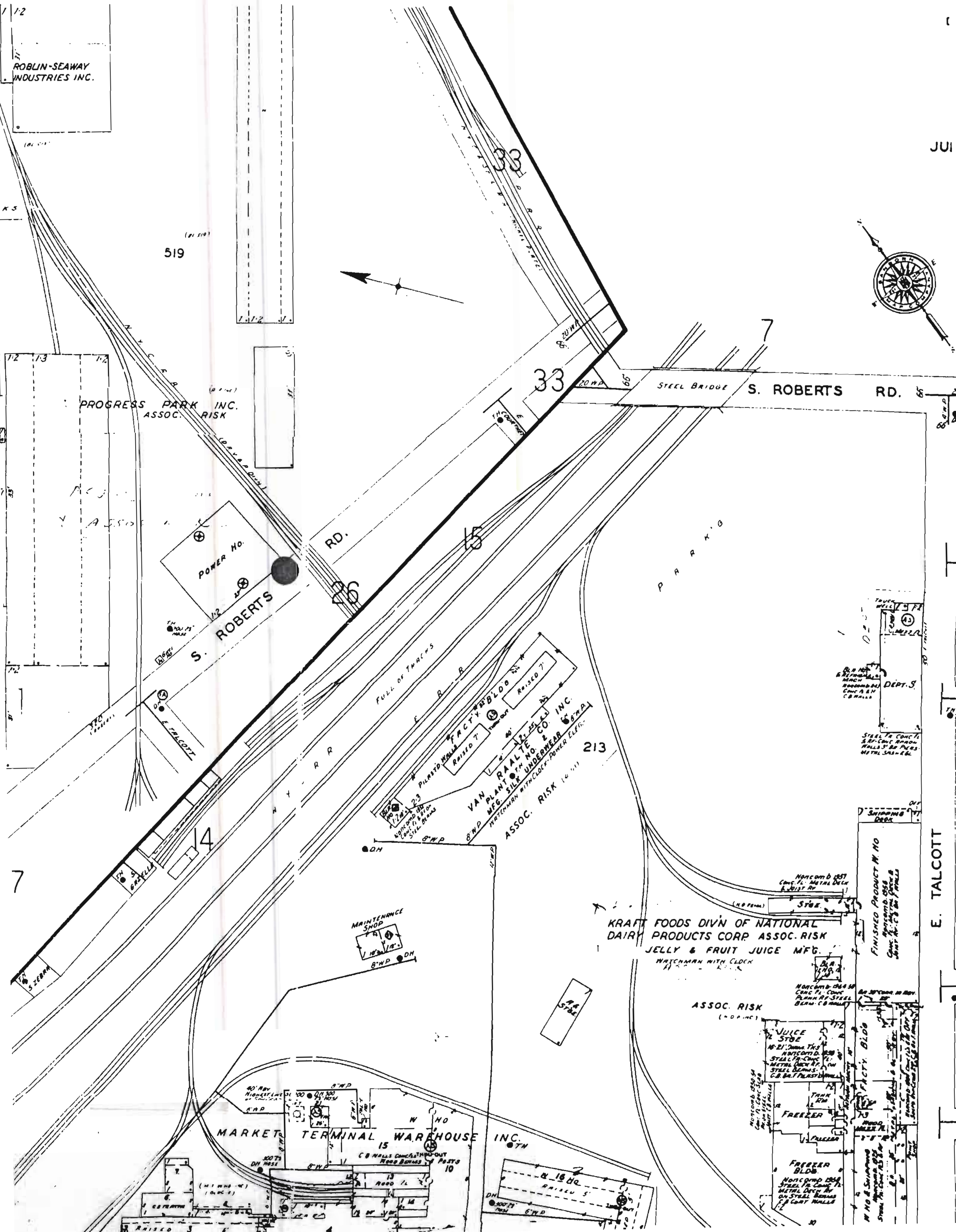
AREAS OF POTENTIAL CONCE



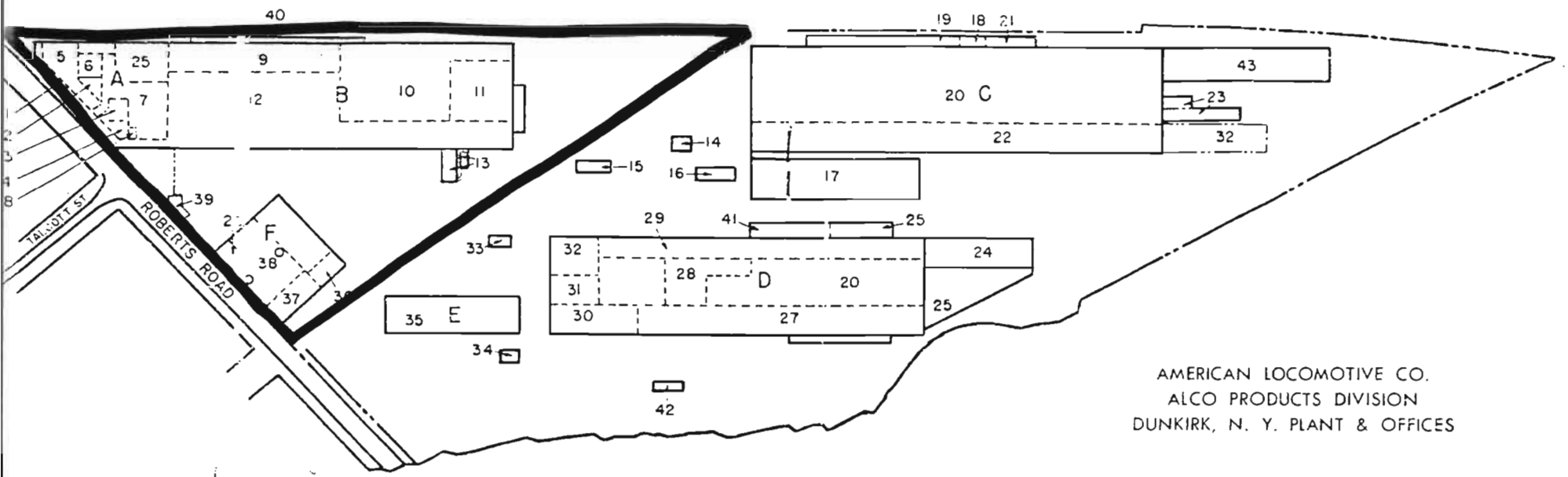
UNITED STATES RADIATOR CORP'N.
AMERICAN LOCOMOTIVE CO.
Mutual Risk
519
AMERICAN LOCOMOTIVE CO.
(BROOKS WORKS)
Mutual Risk
POWER HO.
S. ROBERTS
R'D
S. ROBERTS R'D
33
33
7
15
26
14
213
SUPER HEATER SHOP
WHEEL SHOP
REPAIR DEPT
TIN & COPPER DEPT
RUNNING SHED
RUNNING SHED
ERECTING SHOP
MACHINE SHOP
BLACKSMITH SHOP
CYLINDER SHOP
HAMMER SHOP
CARPENTER SHOP
REST
ST
3RD
UNITED STATES RADIATOR CORPORATION



NY . . . 512
UNITED STATES RADIATOR CORP'N.
AMERICAN LOCOMOTIVE CO.
519
AMERICAN LOCOMOTIVE CO.
(BROOKS WORKS)
POWER HO
TANK PRINT SHOP
S. ROBERTS RD
S. ROBERTS RD
STEEL BRIDGE
33
33
7
7
15
26
14
213
FACTORY BLDG
FULL OF TRACKS
FULL OF TRACKS
WARE HO
13 SHIPPING
ASSEMBLING
UNITED STATES RADIATOR CORPORATION
FOUNDRY



ROBLIN-SEAWAY INDUSTRIES INC.
519
33
7
S. ROBERTS RD.
STEEL BRIDGE
PROGRESS PARK INC.
ASSOC. RISK
POWER HO.
S. ROBERTS RD.
26
15
PARK'G
FULL OF TRACKS
N Y C R R
E. TALCOTT
VAN RAALTE CO. INC.
MFG. SILK UNDERWEAR
ASSOC. RISK
213
14
MAINTENANCE SHOP
KRAFT FOODS DIV'N OF NATIONAL DAIRY PRODUCTS CORP. ASSOC. RISK
JELLY & FRUIT JUICE MFG.
ASSOC. RISK
JUICE STGE.
FREEZER
FREEZER BLDG.
FINISHED PRODUCT W. HO.
DEPT. 3
E. TALCOTT
MARKET TERMINAL WAREHOUSE INC.

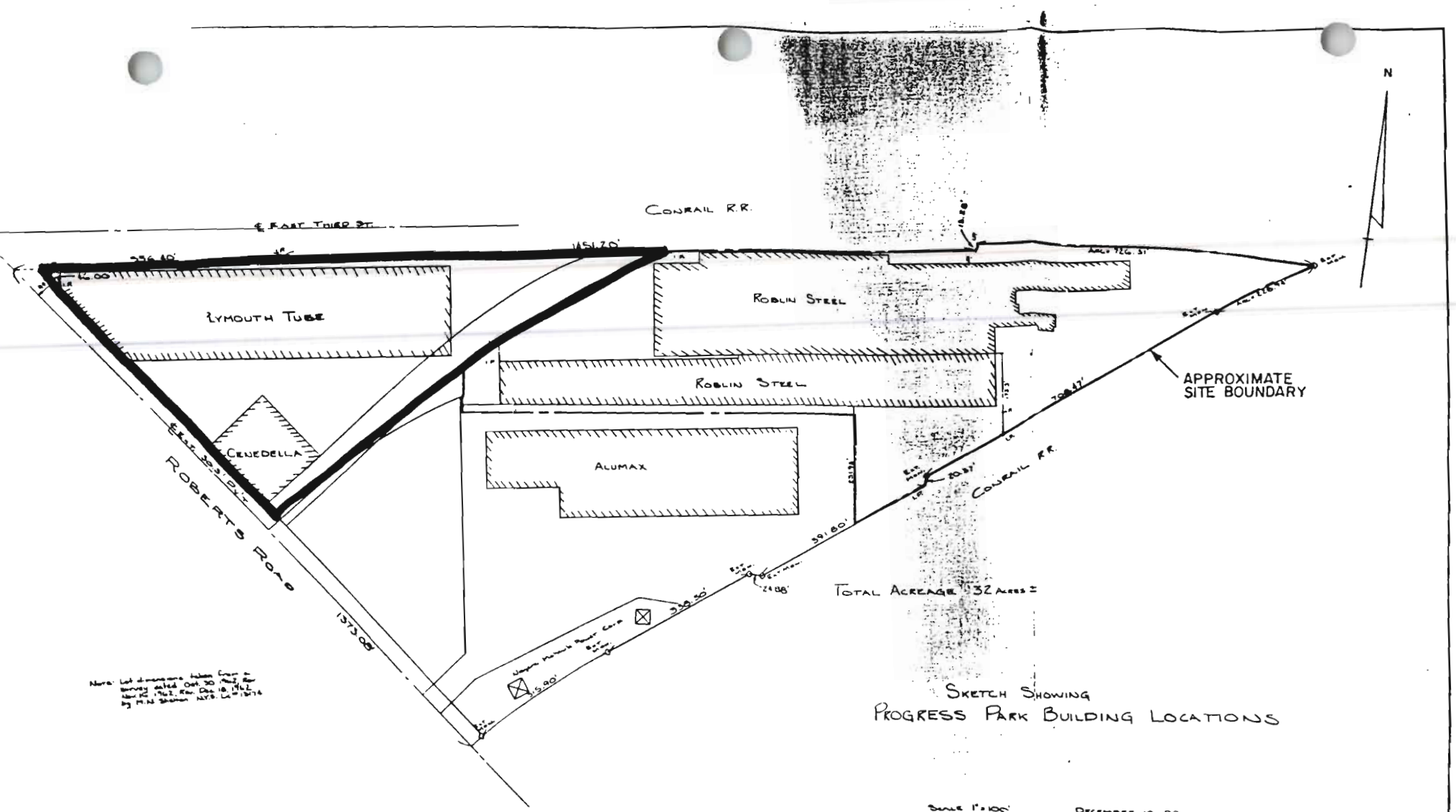


AMERICAN LOCOMOTIVE CO.
ALCO PRODUCTS DIVISION
DUNKIRK, N. Y. PLANT & OFFICES

A GENERAL OFFICE & STORE HOUSE BUILDING
B MACHINE SHOP No. 1
C PLATE SHOP
D MACHINE SHOP No. 2
E PATTERN SHOP
F POWER PLANT

LEGEND

1 Executive Offices
2 Sales Engineering
3 Material Dept.
4 Job Engineering
5 Accounting
6 Planning
7 Engineering Dept. & Drafting
8 Purchasing
9 Sheet Metal Fabrication
10 Tube Bundle Assembly
11 Assembly & Test of Heat Exchangers
12 General Machining Operations
13 Shot Blast (Heat Exchanger Parts)
14 Acetylene Generating House
15 Dri-ox (Liquid Oxygen) Building & Equipment
16 Oil Storage House
17 Application of Corrosion Preventative Coating to Large Dia. Water Pipe for Municipalities
18 Physical Laboratory For Testing of Materials, etc.
19 Shop Offices & Lavatories, etc.
20 General Mfg. of Pressure Vessels & Heavy Fabricated Plate Equipment
21 X-Ray Dept. for Non-Destructive Examination of Fabricated Equipment
22 Mfg. and Hydrostatic Testing of Large Dia. Water Pipe for Municipalities
23 Furnaces for Heat-Treatment of Pressure Vessels, etc.
24 Store Room—Receiving
25 Store Room
26 Plant Hospital
27 Mfg. of Pre-Fabricated Refinery & Other High Pressure Piping
28 Mfg. of Fin Tubing & Assembly of Fin Tube Bundle.
29 Mfg. of Heat Exchanger Parts
30 Mfg. of Tools, Jigs, etc.
31 Painting of Heat Exchangers
32 Shipping Dept.
33 Office for Outside Inspectors, etc.
34 Kiln for Drying Lumber for Patterns
35 Making & Storage of Patterns. Making of Crates for Shipments
36 Repairs to Plant Equipment
37 Semi-Works for Experimental Equipment
38 Power Plant
39 Gate House & Employment Office
40 Shop Offices, Restaurant, Lavatories, etc.
41 Shop Offices Lavatories, etc.
42 Sandblast for Miscellaneous Parts
43 Steel Plate Storage



SKETCH SHOWING ROBLIN STEEL AND OTHER PROGRESS PARK BUILDING LOCATIONS

FIGURE 2

APPENDIX C

APPRAISAL

OF

CONSTRUCTION

7.1, 9 & 10.2
30-1-A & B

PLYMOUTH TUBE COMPANY

CITY OF DUNKIRK

CHAUTAUQUA COUNTY, NEW YORK

DATE February 21, 1973

30 - 1 - 4 & 5

PLYMOUTH TUBE COMPANY
PLYMOUTH TUBE & CENDELLA WOOD PRODUCTS

CITY OF DUNKIRK

CHAUTAUQUA COUNTY, NEW YORK

CONSTRUCTION SUMMARY

Item No. & Description	Replacement Value	Depreciation	True Value
Parcel 30 - 1 - 4	443,040.00		17,720.00
Parcel 30 - 1 - 5	2,115,700.00		431,430.00
	2,558,740.00		449,150.00
TOTAL PLANT TRUE VALUE			449,150.00

PLYMOUTH TUBE COMPANY

CITY OF DUNKIRK

CHAUTAUQUA COUNTY, NEW YORK

CONSTRUCTION SUMMARY

Item No. & Description		Replacement Value	Depreciation	True Value
#43	Strip Shop	408,520.00	60/30%	114,390.00
#44	Cold Drawing Shop	1,527,860.00	65/20%	427,800.00
#44A	Manufacturing	145,370.00	45/20%	63,690.00
#63	Gate House	3,540.00	60/60%	570.00
Y-1	X-Ray Building	7,560.00	60%	3,020.00
	Railroad Siding	22,850.00	70%	6,860.00
		2,115,700.00		616,330.00

30% DEPRECIATION FOR OVERALL PLANT FUNCTIONAL/ECONOMIC OBSOLENCE

431,430.00

30 - 1 - 4

PLYMOUTH TUBE COMPANY

CENDELLA WOOD PRODUCTS

CITY OF DUNKIRK

CHAUTAUQUA COUNTY, NEW YORK

CONSTRUCTION SUMMARY

Item No. & Description	Replacement Value	Depreciation	True Value
#42 A & B Wood Working	443,040.00	75/60%	44,300.00
	443,040.00		44,300.00
60% DEPRECIATION FOR OVERALL PLANT FUNCTIONAL/ECONOMIC OBSOLENCE			17,720.00

Building #42A

WOOD WORKING

Erected - 1909

CONSTRUCTION & SIZE
One story brick, 175' x 95' x 35' high.

FOUNDATION
Reinforced concrete wall and column footings.

WALLS
4" common brick on 12" common brick back-up with pilasters and corbeling including stone coping, wood sash windows, service and trucking doors.

FLOORS
Reinforced concrete slab.

ROOF
Flat type, composition roofing, wood decking with steel purlins and steel beams on steel columns.

MECHANICAL FEATURES
Lighting - conduit wiring, fluorescent and incandescent fixtures.
Heating - unit heaters.
Plumbing - 3 water closets, 3 lavatories, 2 urinals, 1 water heater, piping and drains.

ADDITIONS
Storage - brick, 10' x 30' x 20' high.

Building #42B

WOOD WORKING

Erected - 1909

CONSTRUCTION & SIZE

One story brick, 175' x 60' x 35' to eaves and 39' to ridge.

FOUNDATION

Reinforced concrete wall and column footings.

WALLS

North taken with adjoining building. Balance 4" common brick on 12" common brick back-up with pilasters and corbeling including stone coping, wood sash windows, service and trucking doors.

FLOORS

Reinforced concrete slab.

ROOF

Multi-pitch type, composition roofing, wood decking with steel purlins and steel trusses on steel columns.

MECHANICAL FEATURES

Lighting - conduit wiring, fluorescent and incandescent fixtures.
Heating - unit heaters.
Plumbing - piping and drains.

Building #43

STRIP SHOP

Erected - 1910

CONSTRUCTION & SIZE
One story brick, 36' to 185' x 135' and 185' x 91' x 24' high.
Sawtooth monitors.

FOUNDATION
Reinforced concrete wall and column footings.

WALLS
East taken with adjoining building. Balance 4" common brick on 12" common brick back-up and corbeling including metal facia, steel sash windows, service and trucking doors.

FLOORS
Reinforced concrete slab.

ROOF
Flat sawtooth monitor type, composition roofing, insulation, wood decking with wood joists and steel trusses on steel columns, 5 transverse bays, 4 longitudinal bays.

INTERIOR FINISH
240 lineal feet, 10' high, glazed tile interior wall finish.

MECHANICAL FEATURES
Lighting - conduit wiring, fluorescent fixtures.
Heating - unit heaters.
Sprinkler - wet pipe system.
Plumbing - 2 water closets, 2 lavatories, 1 water heater, piping and drains.

OTHER FEATURES
Offices - frame, 206' x 20' x 10' high.
Partitions - frame, 160 lineal feet, 20' high.

Building #44

COLD DRAWING SHOP

Erected - 1910

CONSTRUCTION & SIZE
One story brick, 185' x 595' x 25' high.
Monitor - 75' x 595' x 12' high.

FOUNDATION
Reinforced concrete wall and column footings.

WALLS
4" common brick on 12" common brick back-up, steel sash windows, service and trucking doors. Monitor, east and west, 4" common brick on 12" common brick back-up and corbeling including metal facia. Monitor, north and south, colored fiberglass siding on steel frame.

FLOORS
Reinforced concrete slab with part 4" wood block flooring.

ROOF
Flat monitor type, composition roofing, wood decking with steel purlins and steel beams on steel columns, 3 transverse bays, 29 longitudinal bays.

MECHANICAL FEATURES
Lighting - conduit wiring, mercury fixtures.
Heating - unit heaters.
Sprinkler - wet pipe system.
Plumbing - 10 water closets, 5 urinals, 3 54" circular, 1 water heater, piping and drains.

OTHER FEATURES
Craneways - 60' span x 595' long with steel girders bracketed to steel columns, 5 walkways, 24" girder depth, 6" girder width, 1/2" flange.
60' span x 595' long with steel girders bracketed to steel, timber columns, 40 walkways, 36" girder depth, 12" girder width, 1" flange.
60' span x 595' long with steel girders bracketed to steel, timber columns, 20 walkways, 30" girder depth, 8" girder width, 3/4" flange thick.

ADDITIONS
Locker Room & Office - brick, 13' x 303' x 10' high.
Bar Straightning - concrete block, 29' x 258' x 15' high.
Neutralizing Room - brick and concrete block, 57' x 29' x 25' average.

Building #44
continued

ADDITIONS (cont.)
Maintenance - brick and concrete block, 49' x 46' x 20' high.
Lime Storage - concrete block, 79' x 20' x 12' to 15' high.
Pickling House - metal, 28' x 110' x 12' average.
(Abandon)

Building #44A

MANUFACTURING

Erected - ?

CONSTRUCTION & SIZE

One story concrete block, 56' x 202' x 25' to 30' high.

WALLS

North taken with adjoining building, 25' high, balance 8" concrete block 5' high. Balance of walls 8" concrete block, steel sash windows, service doors.

FLOORS

Reinforced concrete slab.

ROOF

Single pitch type, composition roofing, insulation, metal decking on steel framing.

MECHANICAL FEATURES

Lighting - conduit wiring, fluorescent fixtures.
Heating - unit heaters.
Sprinkler - wet pipe system.
Plumbing - piping and drains.

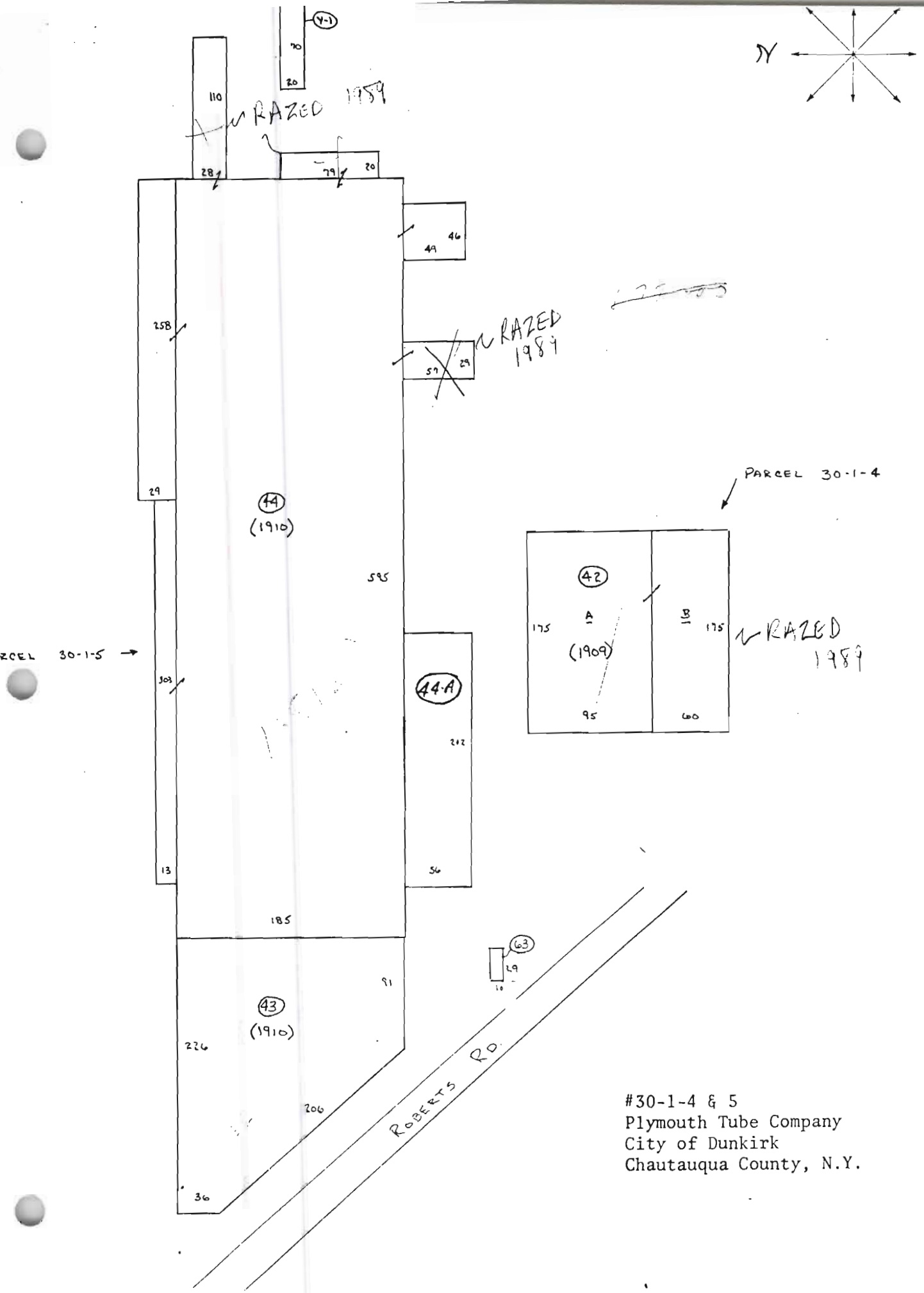
YARD

63 GATE HOUSE
Brick, 10' x 29' x 10' high.

Y-1 X-RAY BUILDING
Concrete block, 20' x 70' x 18' high.

RAILROAD SIDING
1070 lineal feet standard gauge railroad siding including 3 turnouts.

Underground piping consisting of fire prevention lines including post indicator valves and hydrants, storm and sanitary sewer lines, including catch basins and manholes, domestic water lines, gas lines, valves and fittings.



#30-1-4 & 5
Plymouth Tube Company
City of Dunkirk
Chautauqua County, N.Y.

100'-0"

APPRAISED G W.

DATE 8-16-72

APPENDIX D

FIBERTECH ENVIRONMENTAL SERVICES

P.O. Box 6301
Erie, PA 16512
PATRICK HAYNES Phone/Fax (~~814~~) ~~452-4051~~
716 836 0501

PROJECT REPORT

Asbestos Building Survey

for

Edgewood Warehouse

Dunkirk, NY

FIBERTECH ENVIRONMENTAL SERVICES
P.O. BOX 6301
ERIE, PA 1652
(716) 836-6294

Table of Contents

I. Executive Summary

In March of 1997, Fibertech Environmental Services conducted a survey of the Edgewood Warehouse, located on Tolcott street in Dunkirk, NY. The building was surveyed in an attempt to find any asbestos containing material that may be present in the warehouse. Fibertech Environmental Services is an asbestos contractor licensed by the New York State Department of Labor. All samples were collected by personnel trained in an EPA/NYS Asbestos Inspector training program and certified by the New York State Department of Labor to perform such tasks.

The samples collected were sent to Enviro Techniques, Inc., located in Paterson, NJ, for analysis utilizing polarized light microscopy of asbestos. Enviro Techniques is approved by the New York State Department of Health to perform environmental analysis for solid and hazardous waste and participates in the National Voluntary Laboratory Accreditation Program, as well as the Proficiency Analytical Testing Program. Fibertech Environmental Services is only responsible for the methods used during the collection of materials at the Edgewood warehouse and is in no way responsible for the methods used in the analysis of those samples.

Contained in this report are the results from the survey conducted at the Edgewood Warehouse in March of 1997. All materials suspected to contain asbestos were collected and sent to the laboratory for analysis. The results of those tests are summarized and presented for use by the owner. Fibertech Environmental Services is not responsible for any actions taken by the owner regarding any and all material found in the warehouse. Fibertech Environmental services is not responsible in any way for any materials found subsequent to the survey being conducted that may be found to contain asbestos.

Table of Contents

II. Homogeneous Materials List

II. Homogeneous Materials List

Number	Material	Description	Location(s)	Asbestos Present
1	Roof Flashing	brown roofing material	roof on east building	No
2	Siding	gray siding material	exterior of trailer house	Yes
3	Pipe Insulation	6" pipe insulation	throughout warehouse	Yes
4	Window Filler	brown cloth like material	trailer house windows	No
5	Pipe Insulation	2" pipe insulation	throughout warehouse	Yes
6	Pipe Insulation	4" pipe insulation	throughout warehouse	Yes
7	Floor Tile	9"x9" dark brown floor tile	records house	No
8	Floor Mastic	brown mastic material	records house	No
9	Wall Plaster	brown wall plaster board	records house loft	No
10	Wall Plaster	brown wall plaster	records house	No
11	Ceiling Tile	speckled ceiling tile-white	records house bathroom	No
12	Ceiling plaster	ceiling tile-white	Records House / Office Area	No
13	Boiler Insulation	white boiler insulation	Storage house	Yes
14	Wall Plaster	gray wall plaster	office area	No
15	Boiler Insulation	brown boiler insulation	office area	Yes
16	Pipe	tan pipe material	roof above office area / office area	Yes
17	Floor Tile	9"x 9" tan floor tile	records house bathroom	No
18	Floor Mastic	brown floor mastic	records house bathroom	No
19	Pipe Wrap	cloth like pipe wrap	office area	No
20	Floor Tile	12" x 12" gray floor tile	office area	No
21	Floor Mastic	brown floor mastic	office area	No
22	Window Caulk	white caulking material	throughout warehouse	No
23	Roof Membrane	black roofing material	throughout warehouse roof	No
24	Roof Membrane	black roofing material	throughout warehouse roof	No
25	Roof Membrane	brown roofing material	throughout warehouse roof	No
26	Roof Flashing	black roofing material	records house roof	No
27	Roof Membrane	black roofing material	records house roof	No
28	Roof Membrane	black roofing material	records house roof	No
29	Roof Tar	light brown roof tar material	records house roof	No
30	Roof Tar	dark brown roof tar material	records house roof	No
31	Roof Flashing	black roofing material	roof on east building	No

III. Summary of Samples Collected

III. Summary of Samples Collected

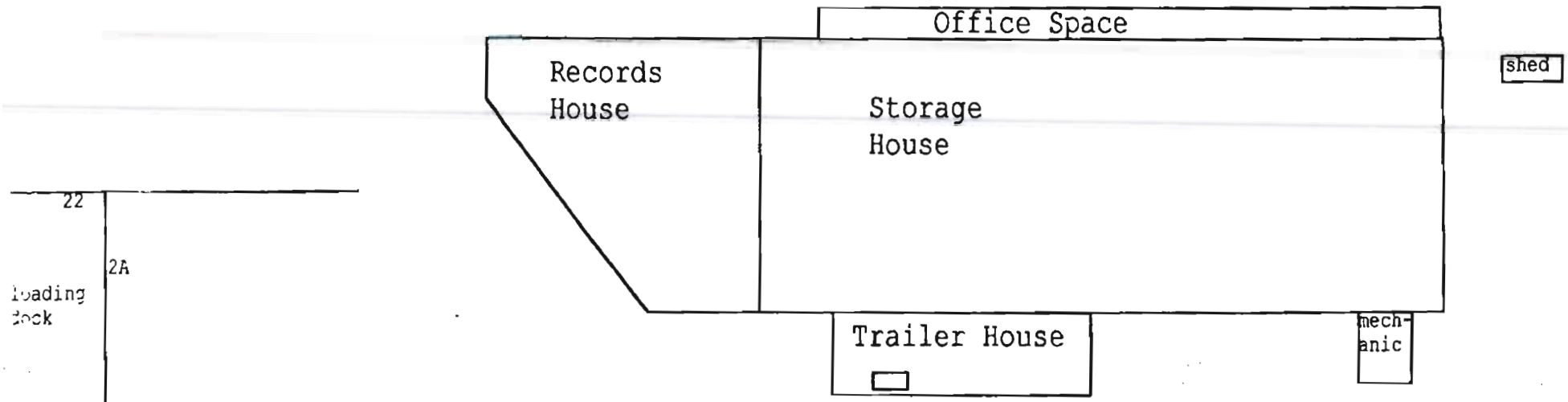
Sample #	Homogeneous #	Location of Sample	Asbestos Present
1	1	East building- roof	No
2A	2	Trailer House- West Wall	Yes
2B	2	Trailer House- South Wall	Yes
3A	3	Records House Loft- West Wall	Yes
3B	3	Trailer House- South Wall	Yes
4	4	Trailer House- South Wall	No
5A	5	Records House- West end of loft	Yes
5B	5	Records House Loft- North West corner	Yes
5C	5	Storage House- North Wall @ office	Yes
6A	6	Records House Loft- North West corner	Yes
6B	6	Records House- East Wall below loft	Yes
7A	7	Records House Loft- East end	No
7B	7	Records House Loft- West end	No
7C	7	Records House- @ stairs to loft	No
8A	8	Records House Loft- East end	No
8B	8	Records House Loft- West end	No
9A	9	Records House Loft- North wall	No
9B	9	Records House Loft- West wall	No
10A	10	Records House- bathroom wall	No
10B	10	Records House- records room wall	No
10C	10	Records House- North wall	No
11A	11	Records House- South wall of bathroom	No
11B	11	Records House Bathroom- inside ceiling	No
12A	12	Records House- Below Loft	No
12B	12	Records House- Below Loft	No
12C	12	Office Area -	No
13A	13	Storage House- boiler on South West Platform	Yes
13B	13	Storage House- boiler on South West Platform	Yes
~~13C~~	~~13~~	~~Storage House- boiler on South West Platform~~	~~Yes~~
14A	14	Office area- North wall	No
14B	14	Office area- South Wall	No
15A	15	Office area- Boiler on raised platform	Yes
15B	15	Office area- Boiler on raised platform	Yes
16A	16	Records House Roof	Yes
16B	16	Office area roof	Yes
17A	17	Records House Bathroom- North side	No
17B	17	Records House Bathroom- South side	No
18A	18	Records House Bathroom-North Side	No
18B	18	Records House Bathroom- South Side	No
19A	19	Office area- pipe above floor	No
20A	20	Office Area Floor	No
20B	20	Office Area Floor	No
21A	21	Office Area Floor	No
22A	22	Outside Trailer House-on loading dock	No
23A	23	Storage House- Lower roof north- east end	No
23B	23	Storage House- Raised roof- north	No
23C	23	Records House Roof- center	No
24A	24	Storage House- Lower roof north- east end	No
24B	24	Storage House- Raised roof- north	No
24C	24	Records House Roof- center	No

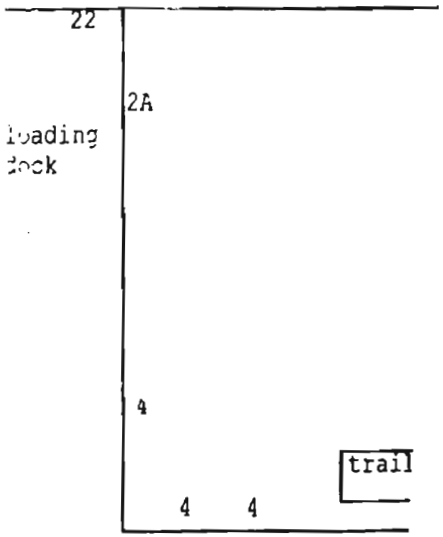
III. Summary of Samples Collected

Sample #	Homogeneous #	Location of Sample	Asbestos Present
25A	25	Storage House- Lower roof north- east end	No
26A, B	26	Office Area roof- East end	No
27A	27	Records House roof- West end	No
28A	28	Records House roof- West end	No
29A	29	Records House roof center on raised rectangle	No
30A	30	Records House roof center on raised rectangle	No
31A	31	East building- roof	No

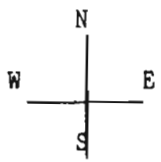
IV. Maps and Locations for Materials Collected

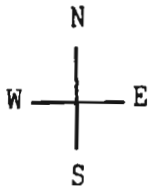
Traile

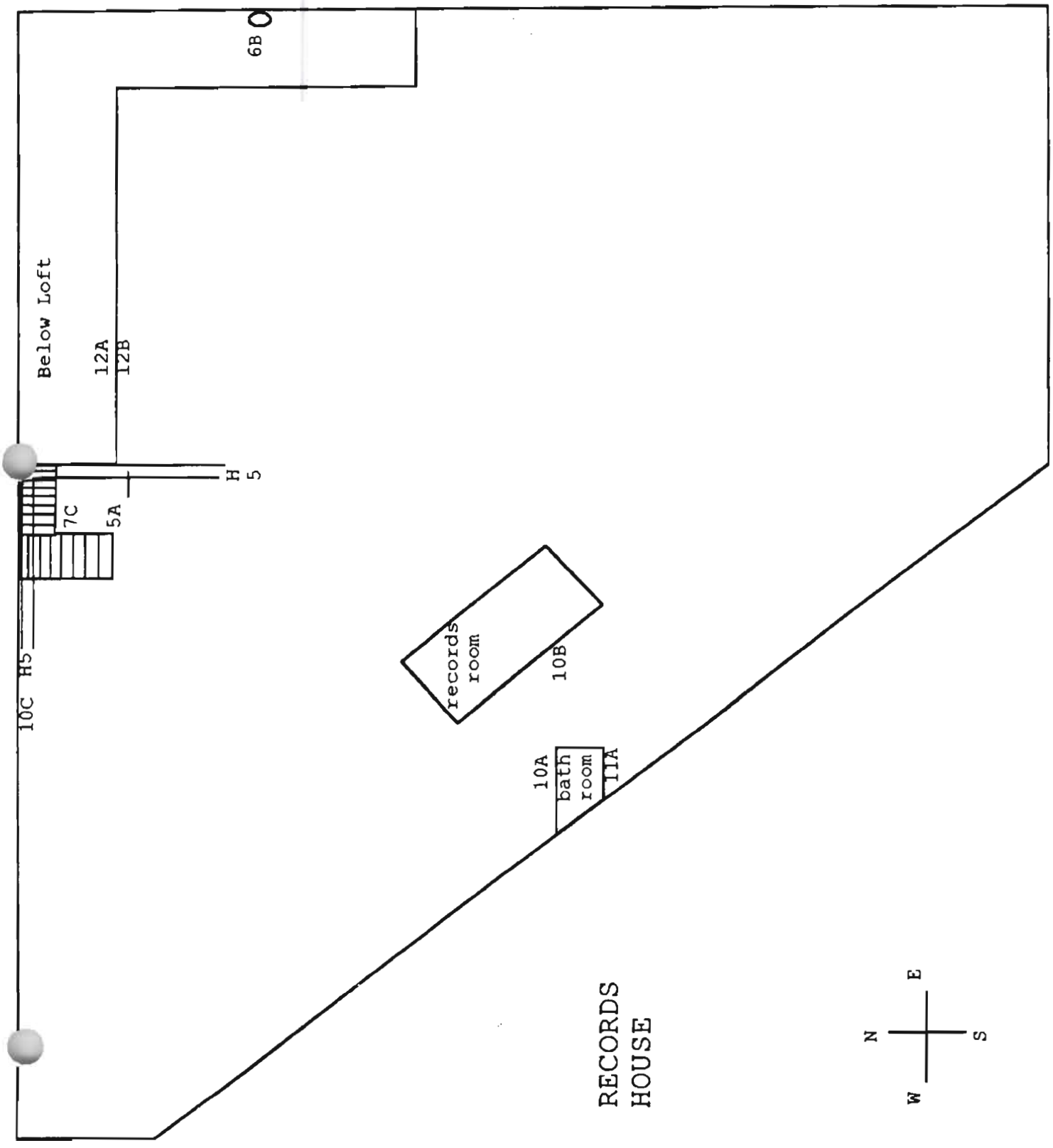


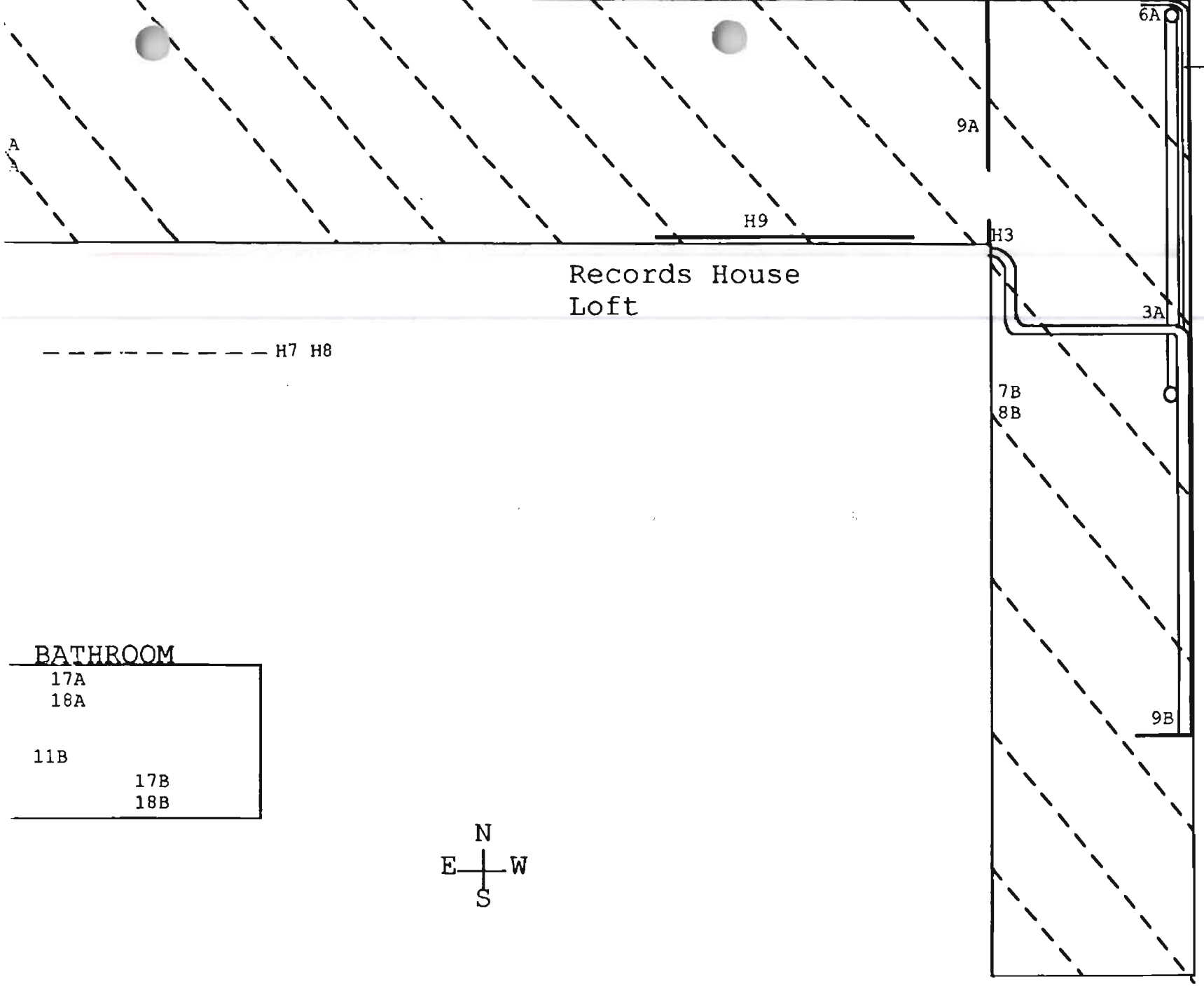


Edgewood Warehouse
Dunkirk, NY

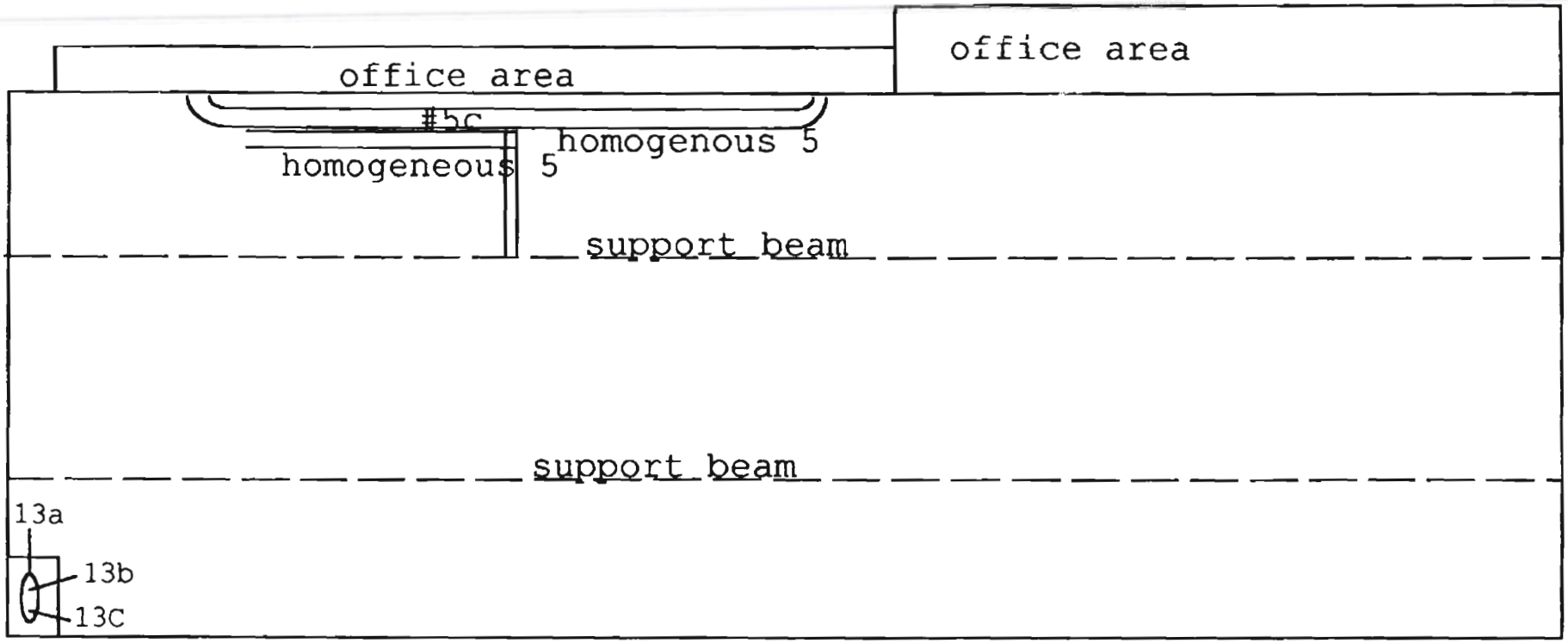


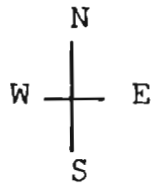



6B
Below Loft
12A
12B
H
5
7C
5A
H5
10C
records
room
10B
10A
bath
room
11A
RECORDS
HOUSE
E
N
S
W

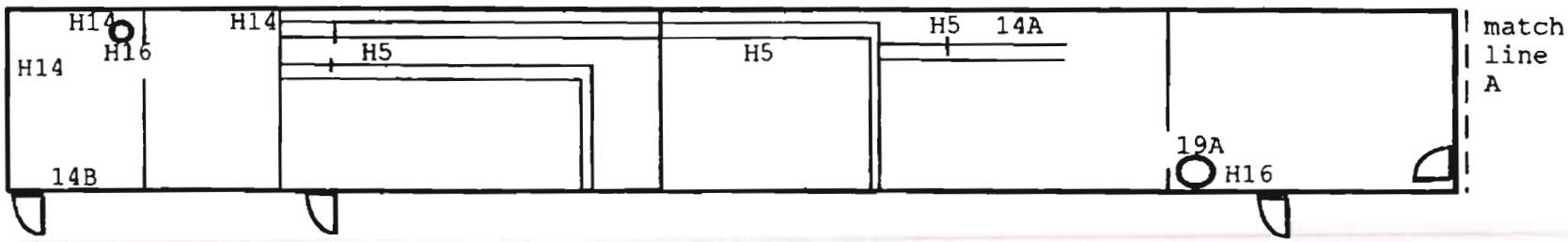

6A
5B
9A
A
H9
H3
Records House
Loft
3A
H7 H8
7B
8B
9B
BATHROOM
17A
18A
11B
17B
18B
N
E
W
S

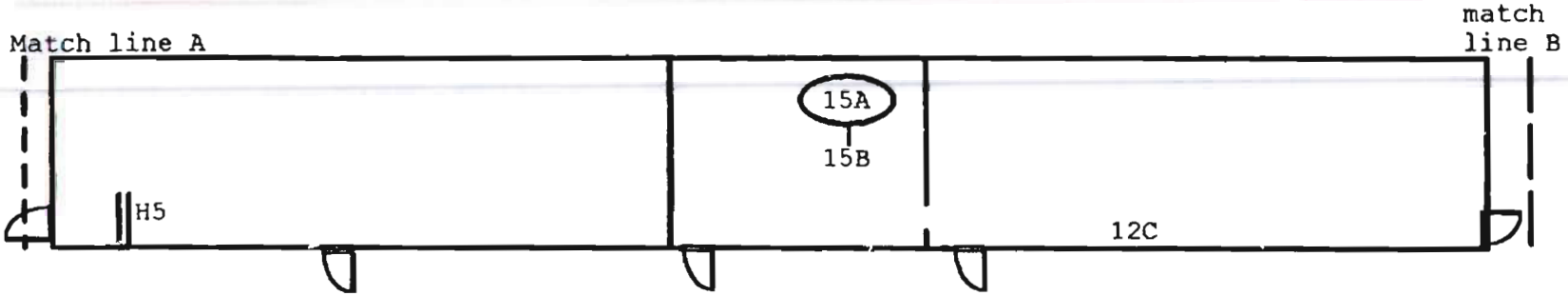
STORAGE HOUSE SITE PLAN
EDGEWOOD WAREHOUSE

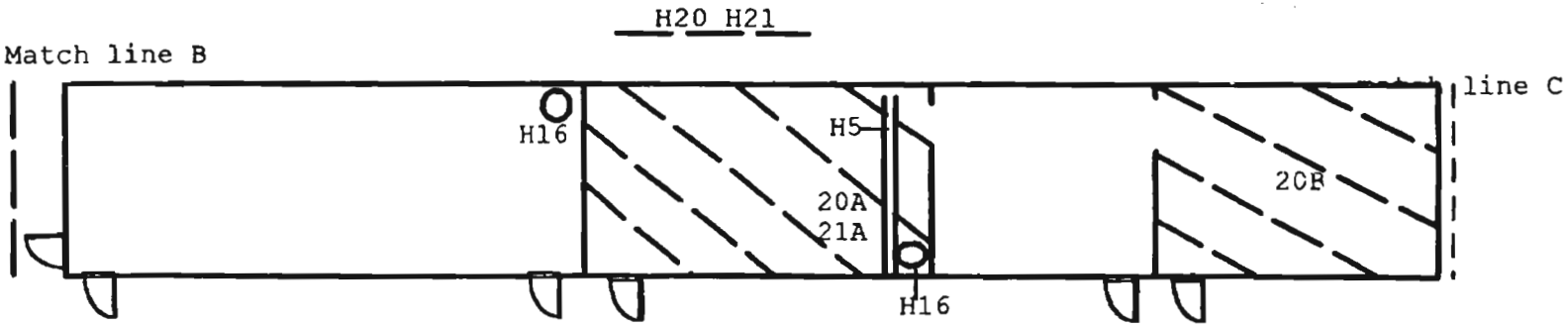


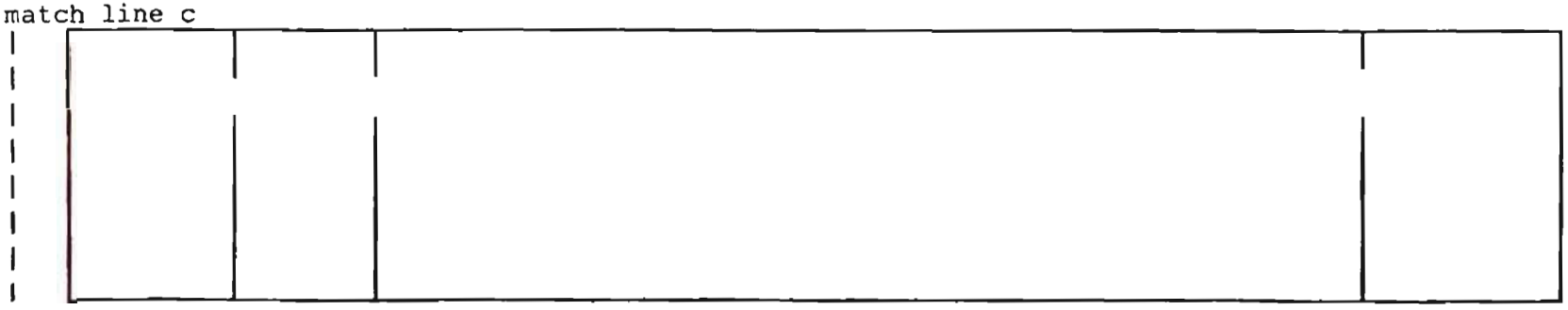


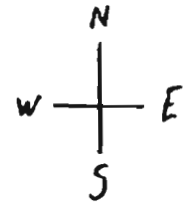
Office Area Site Plan-Adjacent to Storage House

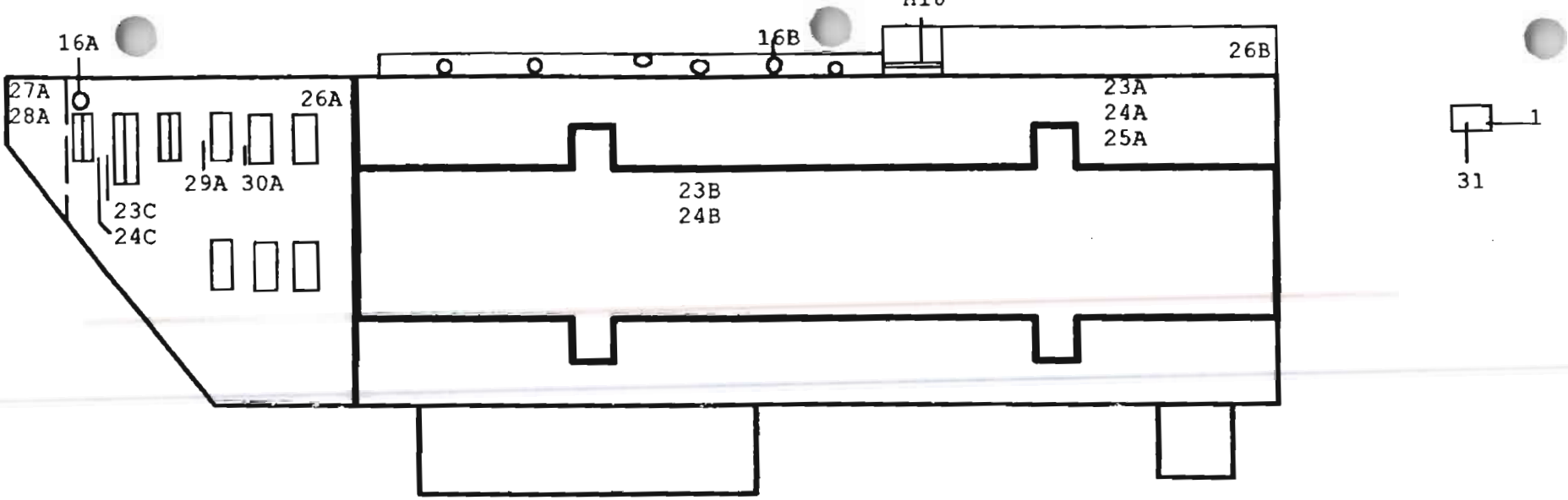




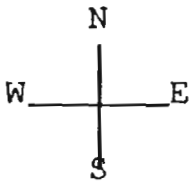








Edgewood Warehouse
Sample Locations for Roofing Material



V. Sample Analysis for Materials Collected

Enviro Techniques, Inc. 22 California Avenue, Paterson, N.J 07503 ■ (201) 684-0202

PLM Bulk Asbestos Report

Date Analyzed: 03/13/97
Project # S397160
Client: Fibertech Environmental Services

ELAP ID: 11043
NVLAP ID: 200024-0

Re: **Edgewood Warehouse**
Entire Warehouse

Sample ID	Lab ID	Asbestos Present	Total % Asbestos
1	7954	No	

Location: Roof Flashing on the back building
Description: Roof Membrane (brown)
Asbestos Types:
Other Materials: 80% Cellulose, 20% Non-fibrous

Sample ID	Lab ID	Asbestos Present	Total % Asbestos
2A	7955	Yes	30%

Location:
Description: Siding (gray)
Asbestos Types: 30% Chrysotile
Other Materials: 60% Cellulose, 10% Fiberglass

Sample ID	Lab ID	Asbestos Present	Total % Asbestos
2B	7956	Yes	30%

Location:
Description: Siding (gray)
Asbestos Types: 30% Chrysotile
Other Materials: 55% Cellulose, 5% Fiberglass, 10% Non-fibrous

Sample ID	Lab ID	Asbestos Present	Total % Asbestos
3A	7957	Yes	8%

Location:
Description: Pipe Insulation (gray)
Asbestos Types: 8% Chrysotile
Other Materials: 10% Cellulose, 6% Synthetic, 76% Non-fibrous

Sample ID	Lab ID	Asbestos Present	Total % Asbestos
3B	7958	Yes	12%

Location:
Description: Pipe Insulation (gray)
Asbestos Types: 12% Chrysotile
Other Materials: 20% Cellulose, 68% Non-fibrous

Analyst **Laboratory Director**

Note: NAD = No Asbestos Detected; NA = Not Analyzed

Bulk Asbestos Analysis per EPA/600/R-93/116, July 1993 and ELAP Analysis Protocols 198.1/198.4 for New York samples; Note: PLM is not consistently reliable in detecting asbestos in floor covering and similar non-friable organically bound materials. TEM is currently the only method that can be used to determine if this material can be considered or treated as non-asbestos -containing in New York State (see also EPA Advisory for floor tile, FR 59, 146, 38970, 8/1/94). National Institute of Standards and Technology Accreditation requirements mandate that this report must not be reproduced except in full with the approval of the laboratory. This report relates only to the items tested.

Enviro Techniques, Inc. 22 California Avenue, Paterson, N.J. 07503 ■ (201) 684-0202

PLM Bulk Asbestos Report

Date Analyzed: 03/13/97
Project # S397160
Client: Fibertech Environmental Services

ELAP ID: 11043
NVLAP ID: 200024-0

Re: **Edgewood Warehouse**
Entire Warehouse

Sample ID	Lab ID	Asbestos Present	Total % Asbestos
4	7959	No	

Location:
Description: Window Filler (brown)
Asbestos Types:
Other Materials: 40% Cellulose, 25% Synthetic, 35% Non-fibrous

Sample ID	Lab ID	Asbestos Present	Total % Asbestos
5A	7960	Yes	20%

Location:
Description: Pipe Insulation (gray)
Asbestos Types: 20% Chrysotile
Other Materials: 40% Cellulose, 40% Non-fibrous

Sample ID	Lab ID	Asbestos Present	Total % Asbestos
5B	7961	Yes	25%

Location:
Description: Pipe Insulation (gray)
Asbestos Types: 25% Chrysotile
Other Materials: 20% Cellulose, 55% Non-fibrous

Sample ID	Lab ID	Asbestos Present	Total % Asbestos
5C	7962	Yes	15%

Location:
Description: Pipe Insulation (gray)
Asbestos Types: 15% Chrysotile
Other Materials: 60% Cellulose, 25% Non-fibrous

Sample ID	Lab ID	Asbestos Present	Total % Asbestos
6A	7963	Yes	30%

Location:
Description: Pipe Insulation (gray)
Asbestos Types: 30% Chrysotile
Other Materials: 40% Cellulose, 30% Non-fibrous

_____ **Analyst** _____ **Laboratory Director**

Note: NAD = No Asbestos Detected; NA = Not Analyzed

Bulk Asbestos Analysis per EPA/600/R-93/116, July 1993 and ELAP Analysis Protocols 198.1/198.4 for New York samples; Note: PLM is not consistently reliable in detecting asbestos in floor covering and similar non-friable organically bound materials. TEM is currently the only method that can be used to determine if this material can be considered or treated as non-asbestos -containing in New York State (see also EPA Advisory for floor tile, FR 59, 146, 38970, 8/1/94).

Enviro Techniques, Inc. 22 California Avenue, Paterson, N.J. 07503 ■ (201) 684-0202

PLM Bulk Asbestos Report

Date Analyzed: 03/13/97
Project # S397160
Client: Fibertech Environmental Services

ELAP ID: 11043
NVLAP ID: 200024-0

Re: **Edgewood Warehouse**
Entire Warehouse

Sample ID	Lab ID	Asbestos Present	Total % Asbestos
6B	7964	Yes	90%

Location:
Description: Pipe Insulation (gray)
Asbestos Types: 30% Chrysotile, 60% Amosite
Other Materials: 10% Non-fibrous

Sample ID	Lab ID	Asbestos Present	Total % Asbestos
7A	7965	No	

Location:
Description: Floor Tile (brown)
Asbestos Types:
Other Materials: 6% Cellulose, 94% Non-fibrous

Sample ID	Lab ID	Asbestos Present	Total % Asbestos
7B	7966	No	

Location:
Description: Floor Tile (brown)
Asbestos Types:
Other Materials: 15% Cellulose, 85% Non-fibrous

Sample ID	Lab ID	Asbestos Present	Total % Asbestos
7C	7967	No	

Location:
Description: Floor Tile (brown)
Asbestos Types:
Other Materials: 20% Cellulose, 80% Non-fibrous

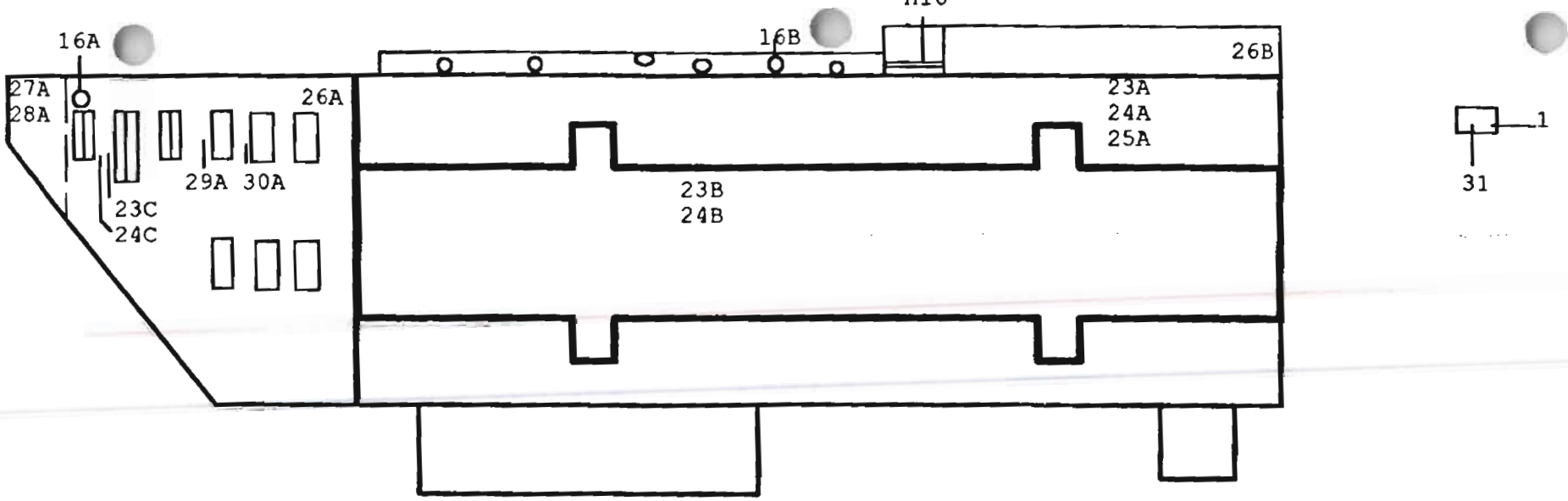
Sample ID	Lab ID	Asbestos Present	Total % Asbestos
8A	7968	No	

Location:
Description: Floor Mastic (brown)
Asbestos Types:
Other Materials: 4% Fiberglass, 14% Cellulose, 82% Non-fibrous

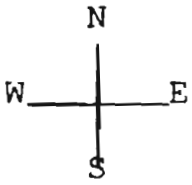
_____ **Analyst** _____ **Laboratory Director**

Note: NAD = No Asbestos Detected; NA = Not Analyzed

Bulk Asbestos Analysis per EPA/600/R-93/116, July 1993 and ELAP Analysis Protocols 198.1/198.4 for New York samples; Note: PLM is not consistently reliable in detecting asbestos in floor covering and similar non-friable organically bound materials. TEM is currently the only method that can be used to determine if this material can be considered or treated as non-asbestos -containing in New York State (see also EPA Advisory for floor tile, FR 59, 146, 38970, 8/1/94). National Institute of Standards and Technology Accreditation requirements mandate that this report must not be reproduced except in full with the approval of the laboratory. This report relates only to the items tested.



Edgewood Warehouse
Sample Locations for Roofing Material



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PLM Bulk Asbestos Report

Date Analyzed: 03/13/97
Project # S397160
Client: Fibertech Environmental Services

ELAP ID: 11043
NVLAP ID: 200024-0

Re: **Edgewood Warehouse**
Entire Warehouse

Sample ID	Lab ID	Asbestos Present	Total % Asbestos
8B	7969	No	

Location:
Description: Floor Mastic (brown)
Asbestos Types:
Other Materials: 69% Non-fibrous, 1% Fiberglass, 30% Cellulose

Sample ID	Lab ID	Asbestos Present	Total % Asbestos
9A	7970	No	

Location:
Description: Wall Plaster Board (brown)
Asbestos Types:
Other Materials: 10% Cellulose, 90% Non-fibrous

Sample ID	Lab ID	Asbestos Present	Total % Asbestos
9B	7971	No	

Location:
Description: Wall Plaster Board (brown)
Asbestos Types:
Other Materials: 85% Cellulose, 15% Non-fibrous

Sample ID	Lab ID	Asbestos Present	Total % Asbestos
10A	7972	No	

Location:
Description: Wall Plaster (brown)
Asbestos Types:
Other Materials: 95% Cellulose, 5% Non-fibrous

Sample ID	Lab ID	Asbestos Present	Total % Asbestos
10B	7973	No	

Location:
Description: Wall Plaster (white)
Asbestos Types:
Other Materials: 4% Cellulose, 96% Non-fibrous

Analyst **Laboratory Director**

Note: NAD = No Asbestos Detected; NA = Not Analyzed

Bulk Asbestos Analysis per EPA/600/R-93/116, July 1993 and ELAP Analysis Protocols 198.1/198.4 for New York samples; Note: PLM is not consistently reliable in detecting asbestos in floor covering and similar non-friable organically bound materials. TEM is currently the only method that can be used to determine if this material can be considered or treated as non-asbestos -containing in New York State (see also EPA Advisory for floor tile, FR 59, 146, 38970, 8/1/94). National Institute of Standards and Technology Accreditation requirements mandate that this report must not be reproduced except in full with the approval of the laboratory. This report relates only to the items tested.

Enviro Techniques, Inc. 22 California Avenue, Paterson, N.J. 07503 ■ (201) 684-0202

PLM Bulk Asbestos Report

Date Analyzed: 03/13/97
Project # S397160
Client: Fibertech Environmental Services

ELAP ID: 11043
NVLAP ID: 200024-0

Re: **Edgewood Warehouse**
Entire Warehouse

Sample ID	Lab ID	Asbestos Present	Total % Asbestos
10C	7974	No	

Location:
Description: Wall Plaster (white)
Asbestos Types:
Other Materials: 1% Cellulose, 99% Non-fibrous

Sample ID	Lab ID	Asbestos Present	Total % Asbestos
11A	7975	No	

Location:
Description: Speckled Ceiling Tile (white)
Asbestos Types:
Other Materials: 80% Fiberglass, 5% Cellulose, 15% Non-fibrous

Sample ID	Lab ID	Asbestos Present	Total % Asbestos
11B	7976	No	

Location:
Description: Speckled Ceiling Tile (white)
Asbestos Types:
Other Materials: 95% Fiberglass, 5% Non-fibrous

Sample ID	Lab ID	Asbestos Present	Total % Asbestos
12A	7977	No	

Location:
Description: Ceiling Tile (white)
Asbestos Types:
Other Materials: 12% Fiberglass, 40% Cellulose, 48% Non-fibrous

Sample ID	Lab ID	Asbestos Present	Total % Asbestos
12B	7978	No	

Location:
Description: Ceiling Tile (white)
Asbestos Types:
Other Materials: 4% Fiberglass, 20% Cellulose, 76% Non-fibrous

_____ **Analyst** _____ **Laboratory Director**

Note: NAD = No Asbestos Detected; NA = Not Analyzed

Bulk Asbestos Analysis per EPA/600/R-93/116, July 1993 and ELAP Analysis Protocols 198.1/198.4 for New York samples; Note: PLM is not consistently reliable in detecting asbestos in floor covering and similar non-friable organically bound materials. TEM is currently the only method that can be used to determine if this material can be considered or treated as non-asbestos -containing in New York State (see also EPA Advisory for floor tile, FR 59, 146, 38970, 8/1/94). National Institute of Standards and Technology Accreditation requirements mandate that this report must not be reproduced except in full with the approval of the laboratory. This report relates only to the items tested.

Sep-11-97 09:57A

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PLM Bulk Asbestos Report

Date Analyzed: 03/13/97
Project # S397160
Client: Fibertech Environmental Services

ELAP ID: 11043
NVLAP ID: 200024-0

Re: **Edgewood Warehouse**
Entire Warehouse

Sample ID	Lab ID	Asbestos Present	Total % Asbestos
12C	7979	No	

Location:
Description: Ceiling Tile (white)
Asbestos Types:
Other Materials: 22% Cellulose, 78% Non-fibrous

Sample ID	Lab ID	Asbestos Present	Total % Asbestos
13A	7980	Yes	4%

Location:
Description: Boiler Insulation (white)
Asbestos Types: 4% Chrysotile
Other Materials: 10% Cellulose, 86% Non-fibrous

Sample ID	Lab ID	Asbestos Present	Total % Asbestos
13B	7981	Yes	5%

Location:
Description: Boiler Insulation (gray)
Asbestos Types: 5% Chrysotile
Other Materials: 15% Cellulose, 80% Non-fibrous

Sample ID	Lab ID	Asbestos Present	Total % Asbestos
14A	7982	No	

Location:
Description: Gr. Wall Plaster (gray)
Asbestos Types:
Other Materials: 4% Fiberglass, 10% Cellulose, 86% Non-fibrous

Sample ID	Lab ID	Asbestos Present	Total % Asbestos
14B	7983	No	

Location:
Description: Gr. Wall Plaster (gray)
Asbestos Types:
Other Materials: 2% Cellulose, 98% Non-fibrous

Analyst **Laboratory Director**

Note: NAD = No Asbestos Detected; NA = Not Analyzed

Bulk Asbestos Analysis per EPA/600/R-93/116, July 1993 and ELAP Analysis Protocols 198.1/198.4 for New York samples; Note: PLM is not consistently reliable in detecting asbestos in floor covering and similar non-friable organically bound materials. TEM is currently the only method that can be used to determine if this material can be considered or treated as non-asbestos -containing in New York State (see also EPA Advisory for floor tile, FR 59. 146, 38970, 8/1/94).

Enviro Techniques, Inc. 22 California Avenue, Paterson, N J. 07503 ■ (201) 684-0202

PLM Bulk Asbestos Report

Date Analyzed: 03/13/97
Project # S397160
Client: Fibertech Environmental Services

ELAP ID: 11043
NVLAP ID: 200024-0

Re: **Edgewood Warehouse**
Entire Warehouse

Sample ID	Lab ID	Asbestos Present	Total % Asbestos
15A	7984	Yes	15%

Location:
Description: Boiler Insulation (brown)
Asbestos Types: 15% Chrysotile
Other Materials: 35% Cellulose, 50% Non-fibrous

Sample ID	Lab ID	Asbestos Present	Total % Asbestos
15B	7985	Yes	16%

Location:
Description: Boiler Insulation (brown)
Asbestos Types: 16% Chrysotile
Other Materials: 30% Cellulose, 54% Non-fibrous

Sample ID	Lab ID	Asbestos Present	Total % Asbestos
16A	7986	Yes	45%

Location:
Description: Pipe (gray)
Asbestos Types: 30% Chrysotile, 15% Amosite
Other Materials: 10% Cellulose, 45% Non-fibrous

Sample ID	Lab ID	Asbestos Present	Total % Asbestos
16B	7987	Yes	40%

Location:
Description: Pipe (brown)
Asbestos Types: 30% Chrysotile, 10% Amosite
Other Materials: 16% Cellulose, 44% Non-fibrous

Sample ID	Lab ID	Asbestos Present	Total % Asbestos
17A	7988	No	

Location:
Description: Floor Tile (brown)
Asbestos Types:
Other Materials: 3% Fiberglass, 2% Cellulose, 95% Non-fibrous

Analyst **Laboratory Director**

Note: NAD = No Asbestos Detected; NA = Not Analyzed

Bulk Asbestos Analysis per EPA/600/R-93/116, July 1993 and ELAP Analysis Protocols 198.1/198.4 for New York samples; Note: PLM is not consistently reliable in detecting asbestos in floor covering and similar non-friable organically bound materials. TEM is currently the only method that can be used to determine if this material can be considered or treated as non-asbestos -containing in New York State (see also EPA Advisory for floor tile, FR 59, 146, 38970, 8/1/94).

Enviro Techniques, Inc. 22 California Avenue, Paterson, N.J. 07503 ■ (201) 684-0202

PLM Bulk Asbestos Report

Date Analyzed: 03/13/97
Project # S397160
Client: Fibertech Environmental Services

ELAP ID: 11043
NVLAP ID: 200024-0

Re: **Edgewood Warehouse**
Entire Warehouse

Sample ID	Lab ID	Asbestos Present	Total % Asbestos
17B	7989	No	

Location:
Description: Floor Tile (brown)
Asbestos Types:
Other Materials: 4% Fiberglass, 2% Cellulose, 94% Non-fibrous

Sample ID	Lab ID	Asbestos Present	Total % Asbestos
18A	7990	No	

Location:
Description: Floor Mastic (brown)
Asbestos Types:
Other Materials: 100% Non-fibrous

Sample ID	Lab ID	Asbestos Present	Total % Asbestos
18B	7991	No	

Location:
Description: Floor Mastic (brown)
Asbestos Types:
Other Materials: 100% Non-fibrous

Sample ID	Lab ID	Asbestos Present	Total % Asbestos
19A	7992	No	

Location:
Description: Pipe Wrap (gray)
Asbestos Types:
Other Materials: 90% Cellulose, 2% Synthetic, 8% Non-fibrous

Sample ID	Lab ID	Asbestos Present	Total % Asbestos
20A	7993	No	

Location:
Description: Floor Tile (green)
Asbestos Types:
Other Materials: 2% Cellulose, 98% Non-fibrous

_____ **Analyst** _____ **Laboratory Director**

Note: NAD = No Asbestos Detected; NA = Not Analyzed

Bulk Asbestos Analysis per EPA/600/R-93/116, July 1993 and ELAP Analysis Protocols 198.1/198.4 for New York samples; Note: PLM is not consistently reliable in detecting asbestos in floor covering and similar non-friable organically bound materials. TEM is currently the only method that can be used to determine if this material can be considered or treated as non-asbestos -containing in New York State (see also EPA Advisory for floor tile, FR 59, 146, 38970, 8/1/94). National Institute of Standards and Technology Accreditation requirements mandate that this report must not be reproduced except in full with the approval of the laboratory. This report relates only to the items tested.

Sep-11-97 09:58A

Enviro Techniques, Inc. 22 California Avenue, Paterson, N.J. 07503 ■ (201) 684-0202

PLM Bulk Asbestos Report

Date Analyzed: 03/13/97
Project # S397160
Client: Fibertech Environmental Services

ELAP ID: 11043
NVLAP ID: 200024-0

Re: **Edgewood Warehouse**
Entire Warehouse

Sample ID	Lab ID	Asbestos Present	Total % Asbestos
20B	7994	No	

Location:
Description: Floor Tile (green)
Asbestos Types:
Other Materials: 3% Fiberglass, 97% Non-fibrous

Sample ID	Lab ID	Asbestos Present	Total % Asbestos
21A	7995	No	

Location:
Description: Floor Mastic (brown)
Asbestos Types:
Other Materials: 90% Cellulose, 10% Non-fibrous

Sample ID	Lab ID	Asbestos Present	Total % Asbestos
22A	7996	No	

Location:
Description: Window Caulking (white)
Asbestos Types:
Other Materials: 1% Cellulose, 99% Non-fibrous

Sample ID	Lab ID	Asbestos Present	Total % Asbestos
23A	7997	No	

Location:
Description: Roof Membrane (black)
Asbestos Types:
Other Materials: 90% Cellulose, 10% Non-fibrous

Sample ID	Lab ID	Asbestos Present	Total % Asbestos
23B	7998	Yes	3%

Location:
Description: Roof Membrane (black)
Asbestos Types: 3% Chrysotile
Other Materials: 85% Cellulose, 12% Non-fibrous

_____ **Analyst** _____ **Laboratory Director**

Note: NAD = No Asbestos Detected; NA = Not Analyzed

Bulk Asbestos Analysis per EPA/600/R-93/116, July 1993 and ELAP Analysis Protocols 198.1/198.4 for New York samples; Note: PLM is not consistently reliable in detecting asbestos in floor covering and similar non-friable organically bound materials. TEM is currently the only method that can be used to determine if this material can be considered or treated as non-asbestos -containing in New York State (see also EPA Advisory for floor tile, FR 59, 146, 38970, 8/1/94).

Enviro Techniques, Inc. 22 California Avenue, Paterson, N.J. 07503 ■ (201) 684-0202

PLM Bulk Asbestos Report

Date Analyzed: 03/13/97
Project # S397160
Client: Fibertech Environmental Services

ELAP ID: 11043
NVLAP ID: 200024-0

Re: **Edgewood Warehouse**
Entire Warehouse

Sample ID	Lab ID	Asbestos Present	Total % Asbestos
23C	7999	No	

Location:
Description: Roof Membrane (black)
Asbestos Types:
Other Materials: 88% Cellulose, 12% Non-fibrous

Sample ID	Lab ID	Asbestos Present	Total % Asbestos
24A	8000	No	

Location:
Description: Roof Membrane (black)
Asbestos Types:
Other Materials: 70% Cellulose, 30% Non-fibrous

Sample ID	Lab ID	Asbestos Present	Total % Asbestos
24B	8001	No	

Location:
Description: Roof Membrane (black)
Asbestos Types:
Other Materials: 85% Cellulose, 15% Non-fibrous

Sample ID	Lab ID	Asbestos Present	Total % Asbestos
24C	8002	No	

Location:
Description: Roof Membrane (black)
Asbestos Types:
Other Materials: 88% Cellulose, 12% Non-fibrous

Sample ID	Lab ID	Asbestos Present	Total % Asbestos
25A	8003	No	

Location:
Description: Roof Membrane (brown)
Asbestos Types:
Other Materials: 95% Cellulose, 5% Non-fibrous

_____ **Analyst** _____ **Laboratory Director**

Note: NAD = No Asbestos Detected; NA = Not Analyzed

Bulk Asbestos Analysis per EPA/600/R-93/116, July 1993 and ELAP Analysis Protocols 198.1/198.4 for New York samples; Note: PLM is not consistently reliable in detecting asbestos in floor covering and similar non-friable organically bound materials. TEM is currently the only method that can be used to determine if this material can be considered or treated as non-asbestos -containing in New York State (see also EPA Advisory for floor tile, FR 59, 146, 38970, 8/1/94). National Institute of Standards and Technology Accreditation requirements mandate that this report must not be reproduced except in full with the approval of the laboratory. This report relates only to the items tested.

Sep-11-97 09:59A

Enviro Techniques, Inc. 22 California Avenue, Paterson, N.J. 07503 ■ (201) 684-0202

PLM Bulk Asbestos Report

Date Analyzed: 03/13/97
Project # S397160
Client: Fibertech Environmental Services

ELAP ID: 11043
NVLAP ID: 200024-0

Re: **Edgewood Warehouse**
Entire Warehouse

Sample ID	Lab ID	Asbestos Present	Total % Asbestos
26A	8004	No	

Location:
Description: Roof Flashing (black)
Asbestos Types:
Other Materials: 10% Cellulose, 90% Non-fibrous

Sample ID	Lab ID	Asbestos Present	Total % Asbestos
26B	8005	No	

Location:
Description: Roof Flashing (black)
Asbestos Types:
Other Materials: 15% Cellulose, 85% Non-fibrous

Sample ID	Lab ID	Asbestos Present	Total % Asbestos
27A	8006	No	

Location:
Description: Roof Membrane (black)
Asbestos Types:
Other Materials: 30% Cellulose, 30% Fiberglass, 40% Non-fibrous

Sample ID	Lab ID	Asbestos Present	Total % Asbestos
28A	8007	No	

Location:
Description: Roof Membrane (black)
Asbestos Types:
Other Materials: 15% Fiberglass, 20% Cellulose, 10% Synthetic, 55% Non-fibrous

Sample ID	Lab ID	Asbestos Present	Total % Asbestos
29A	8008	No	

Location:
Description: Light Roof Tar (black)
Asbestos Types:
Other Materials: 5% Fiberglass, 26% Cellulose, 69% Non-fibrous

Analyst

Laboratory Director

Note: NAD = No Asbestos Detected; NA = Not Analyzed

Bulk Asbestos Analysis per EPA/600/R-93/116, July 1993 and ELAP Analysis Protocols 198.1/198.4 for New York samples; Note: PLM is not consistently reliable in detecting asbestos in floor covering and similar non-friable organically bound materials. TEM is currently the only method that can be used to determine if this material can be considered or treated as non-asbestos -containing in New York State (see also EPA Advisory for floor tile, FR 59, 146, 38970, 8/1/94)

Enviro Techniques, Inc. 22 California Avenue, Paterson, N.J. 07503 ■ (201) 684-0202

PLM Bulk Asbestos Report

Date Analyzed: 03/13/97
Project # S397160
Client: Fibertech Environmental Services

ELAP ID: 11043
NVLAP ID: 200024-0

Re: **Edgewood Warehouse**
Entire Warehouse

Sample ID	Lab ID	Asbestos Present	Total % Asbestos
30A	8009	No	

Location:
Description: Dark Roof Tar (black)
Asbestos Types:
Other Materials: 1% Fiberglass, 25% Cellulose, 74% Non-fibrous

Sample ID	Lab ID	Asbestos Present	Total % Asbestos
31A	8010	No	

Location:
Description: Roof Flashing (black)
Asbestos Types:
Other Materials: 10% Fiberglass, 35% Cellulose, 55% Non-fibrous

_____ **Analyst** _____ **Laboratory Director**

Note: NAD = No Asbestos Detected; NA = Not Analyzed

Bulk Asbestos Analysis per EPA/600/R-93/116, July 1993 and ELAP Analysis Protocols 198.1/198.4 for New York samples; Note: PLM is not consistently reliable in detecting asbestos in floor covering and similar non-friable organically bound materials. TEM is currently the only method that can be used to determine if this material can be considered or treated as non-asbestos -containing in New York State (see also EPA Advisory for floor tile, FR 59, 146, 38970, 8/1/94).

NEW YORK DEPARTMENT OF LABOR
DIVISION OF SAFETY AND HEALTH
License and Certificate Unit
ONE MAIN STREET
BROOKLYN, NY 11201

ASBESTOS HANDLING LICENSE

LICENSE NUMBER: AC-97-0050
DATE OF ISSUE: 01-30-97
EXPIRATION DATE: 09-30-97

Contractor: FIBERTECH ENVIRONMENTAL SERVICES

Address: P.O. BOX 6301
ERIE, PA 16512

Duly Authorized Representative: JEFFREY A. HAYNES, PRES.

This license has been issued in accordance with applicable provisions of Article 30 of the Labor Law of New York State and of the New York State Codes, Rules and Regulations (12 NYCRR Part 56). It is subject to suspension or revocation for a (1) serious violation of state, federal or local laws with regard to the conduct of an asbestos project, or (2) demonstrated lack of responsibility in the conduct of any job involving asbestos or asbestos material.

This license is valid only for the contractor named above and this license or a photocopy must be prominently displayed at the asbestos project worksite. The licensee verifies that all persons employed by the licensee on an asbestos project in New York State have been issued an Asbestos Certificate, appropriate for the type of work they perform, by the New York State Department of Labor.

Maria L. Colavito

Maria L. Colavito, Director
FOR THE COMMISSIONER OF LABOR

DOSH-432 (2-91)

Niagara County Community College

Division of Lifelong Learning

Certificate of Completion

This is to certify that:

PATRICK J. HAYNES

SS# 081-58-8856

has successfully completed the requisite training for
U.S. EPA - TSCA Title II and New York State Department of Health - Part 73
for the

EPA/NYS ASBESTOS INSPECTOR TRAINING PROGRAM

on

MARCH 11 - 13, 1996

Date of Examination: MARCH 13, 1996

Date of Expiration: MARCH 13, 1997

Date of Birth: MAY 29, 1966

Dean of Lifelong Learning
Niagara County Community College

Director of Corporate Training
Niagara County Community College

Certificate No. EI 295

NIAGARA COUNTY COMMUNITY COLLEGE

Niagara County Community College
Division of Lifelong Learning
Department of Corporate Training
PO Box 70
Lockport, NY 14095
(716) 433-1856

Niagara County Community College
Division of Lifelong Learning
Certificate of Completion

This is to certify that:

PATRICK HAYNES

SS# 081-58-8856

has successfully completed the requisite training for
U.S. EPA - TSCA Title II and New York State Department of Health - Part 73
for the

EPA/NYS ASBESTOS INSPECTOR REFRESHER TRAINING PROGRAM

on

FEBRUARY 6, 1997

Dean of Lifelong Learning
Niagara County Community College

Date of Examination: FEBRUARY 6, 1997

Date of Expiration: FEBRUARY 6, 1998

Date of Birth: MAY 29, 1966

Director of Corporate Training
Niagara County Community College

NIAGARA COUNTY COMMUNITY COLLEGE

Certificate No. IR 250

Niagara County Community College
Division of Lifelong Learning
Department of Corporate Training
PO Box 70
Lockport, NY 14095
(716) 433-1856

National Institute of Standards and Technology

NVLAP®

National Voluntary Laboratory Accreditation Program

ISO/IEC GUIDE 25:1990
ISO 9002:1987

Scope of Accreditation

BULK ASBESTOS FIBER ANALYSIS **NVLAP LAB CODE 200024-0**

ENVIRO TECHNIQUES, INC.
22 California Avenue
Paterson, NJ 07503
Mr. Frank Marino
Phone: 201-684-0202 Fax: 201-684-3007

NVLAP Code	*Designation*
18/A01	U.S. EPA's "Interim Method for the Determination of Asbestos in Bulk Insulation Samples" as found in 40 CFR, Part 763, Subpart F, App. A, or the current U.S. EPA method for the analysis of asbestos in building material.

September 30, 1997

Effective through

For the National Institute of Standards and Technology

United States Department of Commerce
National Institute of Standards and Technology

NVLAP®

ISO/IEC GUIDE 25:1990
ISO 9002:1987

Certificate of Accreditation

DEPARTMENT OF COMMERCE
UNITED STATES OF AMERICA

ENVIRO TECHNIQUES, INC.
PATERSON, NJ

is recognized under the National Voluntary Laboratory Accreditation Program for satisfactory compliance with criteria established in Title 15, Part 285 Code of Federal Regulations. These criteria encompass the requirements of ISO/IEC Guide 25 and the relevant requirements of ISO 9002 (ANSI/ASQC Q92-1987) as suppliers of calibration or test results. Accreditation is awarded for specific services, listed on the Scope of Accreditation for:

BULK ASBESTOS FIBER ANALYSIS

September 30, 1997

Effective through

For the National Institute of Standards and Technology

NVLAP Lab Code: 200024-0

NVLAP 01C (11-96)

BARBARA A. DEBUONO, M.D., M.P.H. Commissioner

Expires 12:01 AM April 1, 19
ISSUED April 1, 1996
REVISED July 24, 1996

INTERIM CERTIFICATE OF APPROVAL FOR LABORATORY SERVICE

Issued in accordance with and pursuant to section 502 Public Health Law of New York State

Lab ID No.: 11043
Director: MR. FRANK MARINO
Lab Name: ENVIRO TECHNIQUES INC
Address : 22 CALIFORNIA AVENUE
PATTERSON NJ 07503

is hereby APPROVED as an Environmental Laboratory for the category

ENVIRONMENTAL ANALYSES/SOLID AND HAZARDOUS WASTE

All approved subcategories and/or analytes are listed below:

Cellaneous :
Asbestos in Friable Material
Lead in Paint

Serial No.: 033096

Wadsworth Center

Property of the New York State Department of Health. Valid only at the address shown.
Must be conspicuously posted. Valid certificate has a red serial number.

DOH-3317 (3/95)

PROFICIENCY ANALYTICAL TESTING (PAT) PROGRAM
LABORATORY YEAR-TO-DATE PERFORMANCE REPORT FOR ROUND 126
LAB ID=06985 AUGUST 19, 1996
ENVIROTECH, PATERSON, NJ 07503

SAMPLE TYPE	ROUND	ROUND * PERFORMANCE	ACCUMULATED PERFORMANCE 4 ROUNDS	(%)	2 ROUNDS	(%)	PROFICIENCY RATING #
ASBESTOS/FIBERS	123	4/4					
	124	3/4					
	125	4/4					
	126	4/4	15/16	94	8/8	100	P

* The denominators represent the number of total samples analyzed.
The numerators represent the number of acceptable results.

\# P : Proficient N: Nonproficient -: Not Rated

Performance ratings are based on accumulated results over four rounds (one year). A lab's performance on each sample type is rated proficient (P), if: 1) three-fourths (75%) or more of the accumulated results over four rounds are acceptable or 2) for the last two rounds, all samples are analyzed and the results are 100 % acceptable. If a laboratory receives samples for a contaminant and does not report the data, no rating will be given for that contaminant.

STATE OF NEW YORK · DEPARTMENT OF LABOR
DIVISION OF SAFETY AND HEALTH
License and Certificate Unit
ONE MAIN STREET
BROOKLYN, NY 11201

ASBESTOS HANDLING LICENSE

LICENSE NUMBER: AC-96-0741
DATE OF ISSUE: 08-16-96
EXPIRATION DATE: 08-31-97

Contractor: ENVIRO TECHNIQUES, INC.
Address: 122 CALIFORNIA AVENUE
PATERSON, NJ 07503

Duly Authorized Representative: FRANK MARINO, PRES.

This license has been issued in accordance with applicable provisions of Article 30 of the Labor Law of New York State and of the New York State Codes, Rules and Regulations (12 NYCRR Part 56). It is subject to suspension or revocation for a (1) serious violation of state, federal or local laws with regard to the conduct of an asbestos project, or (2) demonstrated lack of responsibility in the conduct of any job involving asbestos or asbestos material.

This license is valid only for the contractor named above and this license or a photocopy must be prominently displayed at the asbestos project worksite. The licensee verifies that all persons employed by the licensee on an asbestos project in New York State have been issued an Asbestos Certificate, appropriate for the type of work they perform, by the New York State Department of Labor.

Maria L. Colavito

Maria L. Colavito, Director
FOR THE COMMISSIONER OF LABOR

POSH-432 (3-91)

APPENDIX E

ERIIS Custom Detail Radius Report

SUBJECT PROPERTY: Roblin
Roberts Road
Dunkirk, NY 14048

ORDERED BY: Clough, Harbour $ Associate, LLP

REPORT NUMBER: 190681A

PREPARED ON: 09/09/97

ERIIS DISCLAIMER

The Information contained in the ERIIS Report has been obtained from publicly available data sources and other secondary sources of information produced by entities other than ERIIS. Although reasonable care has been taken by ERIIS in compiling the information contained in the Report, ERIIS disclaims any and all liability for any errors, omissions or inaccuracies in this information. THIS REPORT DOES NOT CONSTITUTE A LEGAL OR PROFESSIONAL OPINION AND IS NOT AN ENVIRONMENTAL RISK AUDIT OR ASSESSMENT. THE DATA AND REPORTS ARE PROVIDED "AS IS". ERIIS MAKES NO REPRESENTATIONS OR WARRANTIES OF ANY KIND WHATSOEVER WITH RESPECT TO THE DATA OR THE REPORTS INCLUDING, BUT NOT LIMITED TO, THEIR CORRECTNESS, COMPLETENESS, CURRENTNESS, FITNESS FOR A PARTICULAR PURPOSE OR MERCHANTABILITY, NOR ARE SUCH REPRESENTATIONS OR WARRANTIES TO BE IMPLIED WITH RESPECT TO THE DATA OR REPORTS FURNISHED AND ERIIS ASSUMES NO RESPONSIBILITY WITH RESPECT TO THE PURCHASER'S USE THEREOF. ERIIS SHALL HAVE NO LIABILITY, IN CONTRACT, TORT OR OTHERWISE, FOR ANY INACCURACY OR DEFECT OR OMISSION IN PROCURING, COMPILING, COLLECTING, INTERPRETING, REPORTING, COMMUNICATING OR DELIVERING THE REPORTS OR DATA OR ANY OTHER MATTER RELATED TO CUSTOMER'S USE OF THE SERVICE, WITHOUT LIMITING THE GENERALITY OF THE FOREGOING. NONE OF ERIIS, ITS PARTNERS, OFFICERS, EMPLOYEES OR DATA SUPPLIERS SHALL IN ANY EVENT HAVE ANY LIABILITY FOR LOST PROFITS OR FOR ANY OTHER INDIRECT, SPECIAL, INCIDENTAL, CONSEQUENTIAL, EXEMPLARY OR PUNITIVE DAMAGES. Each Report is valid only for the geographical parameters and as of the date specified on the cover page of such Report, and any alteration or deviation from the description, or any subsequent use, will require a new Report. In the case of any Data obtained from a Data Supplier, ERIIS will advise the Data Supplier of any inaccuracies reported to it, but can take no responsibility for the accuracy or completeness of the Data provided to the Purchaser under this Agreement.

ERIIS Custom Detail Radius Statistical Profile

ERIIS Report #190681A

Sep 9, 1997

ITE: Roblin
Roberts Road
Dunkirk, NY 14048

Latitude: 42.486556
Longitude: -79.316136

State: NY

DATABASE	RADIUS (MI)	TARGET AREA**	PROPERTY-1/4	1/4-1/2	1/2-1	>1	TOTAL
NPL	1.00		0	0	0		0
CERCLIS	0.60		0	0	0		0
RCRIS_TS	1.00		0	0	0		0
RCRIS_LG	0.35		3	0			3
RCRIS_SG	0.35		0	0			0
ERNS	0.15		0				0
LRST	0.60		0	0	0		0
SWF	0.60		0	0	0		0
HWS	1.00		0	0	1		1
NFRAP	0.60		0	0	0		0
CBS	0.35		2	0			2
MOSF	0.35		0	0			0
PBS	0.35		3	0			3
SPILLS	0.60		0	0	0		0
			8	0	1	0	9

TOPO QUAD: Dunkirk

Radon Zone Level: 1

Zone 1 has a predicted average indoor screening level > than 4 pCi/L

A Radon Zone should not be used to determine if individual homes need to be tested for radon.
The EPA's Office of Radiation and Indoor Air (202/233-9320) recommends that all homes be tested for radon, regardless of geographic location or the zone designation in which the property is located.

*A target area is defined as a .02 mile buffer around the site's latitude and longitude.
A blank radius count indicates that the database was not searched by this radius per client instructions.
NR in a radius count indicates that the database cannot be reported by this search criteria due to insufficient and/or inaccurate addresses reported by a federal/state agency.

505 Huntmar Park Dr, Suite 200
Herndon, VA 20170
(703)834-0600 (800)989-0402
FAX: (703)834-0606

SITE INFORMATION

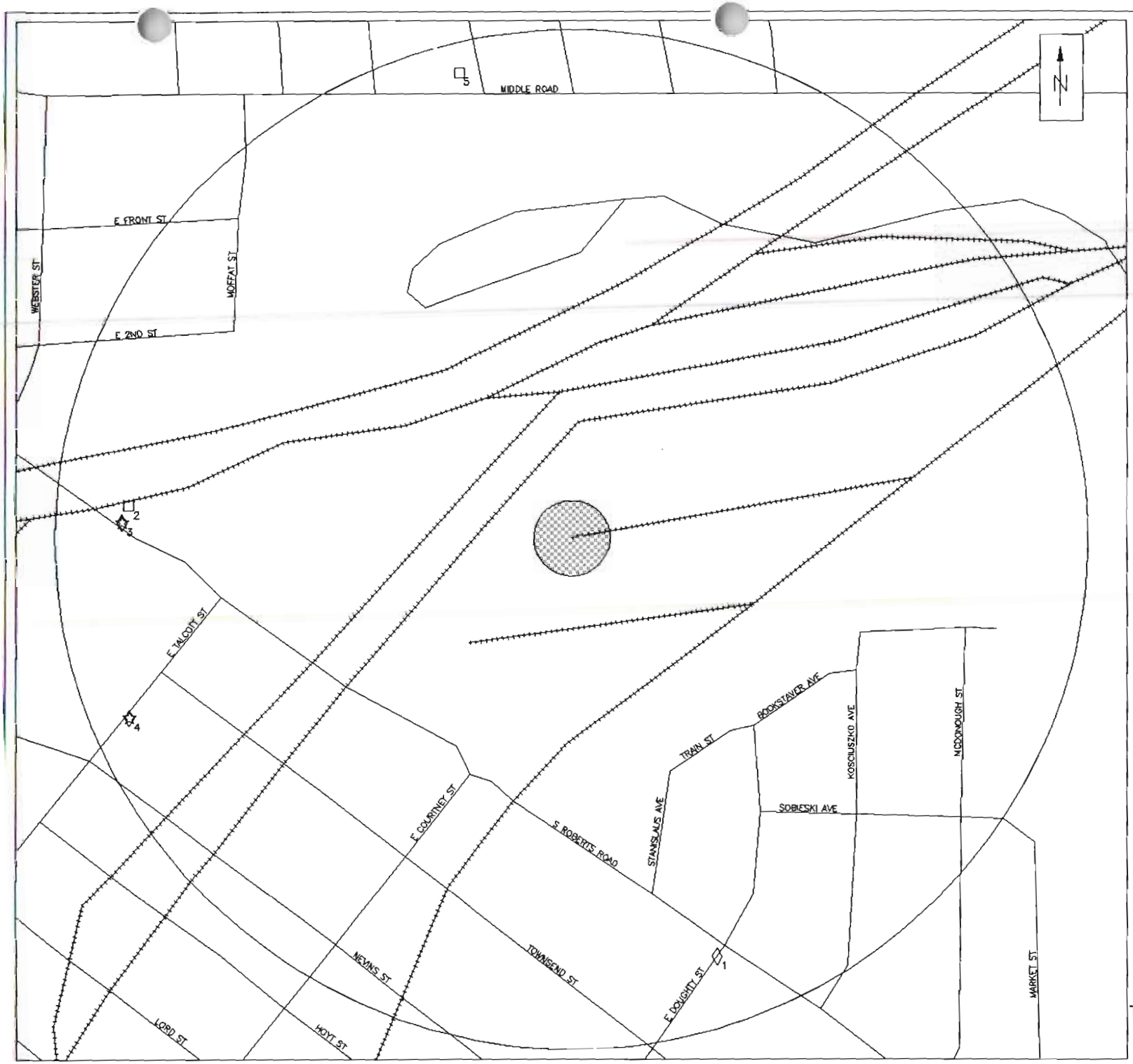
Roblin
Roberts Road
Dunkirk, NY
Chautauqua County
Job Number: 190681A
Map Plotted: Sep 9, 1997

MAP LEGEND

- Target Area
- Radii .25, .5, 1 Mi
- Hydrography
- Railroads
- Roads
- Highways
- NPL 0 Sites
- RCRIS_TS 0 Sites
- CERCLIS 0 Sites
- NFRAP 0 Sites
- RCRIS_LG 3 Sites
- RCRIS_SG 0 Sites
- ERNS 0 Sites
- HWS 1 Site
- LRST 0 Sites
- SWF 0 Sites
- PBS 3 Sites
- MOSF 0 Sites
- CBS 2 Sites
- SPILLS 0 Sites

Miles

0 0.25 0.5



505 Huntmar Park Dr, Suite 200
Herndon, VA 20170
(703)834-0600 (800)989-0402
FAX: (703)834-0606

SITE INFORMATION

Roblin
Roberts Road
Dunkirk, NY
Chautauqua County
Job Number: 190681A
Map Plotted: Sep 9, 1997

MAP LEGEND

- Target Area
- Radii .25, .5, 1 Mi
- Hydrography
- Railroads
- Roads
- Highways
- ★ NPL 0 Sites
- □ RCRIS_TS 0 Sites
- ● CERCLIS 0 Sites
- ○ NFRAP 0 Sites
- □ RCRIS_LG 3 Sites
- □ RCRIS_SG 0 Sites
- ☆ ERNS 0 Sites
- ○ HWS 1 Site
- ✣ LRST 0 Sites
- △ SWF 0 Sites
- ◇ PBS 3 Sites
- ✣ MOSF 0 Sites
- ☆ CBS 2 Sites
- ◇ SPILLS 0 Sites

*Legend is not adjusted for 1/4 mile view.

Miles

0 0.05 0.1

NPL

Date of Data: 06/06/97
Release Date: 06/13/97
Date on System: 06/27/97
US Environmental Protection Agency
Office of Solid Waste and Emergency Response
703/603-8881

National Priorities List

The NPL Report is an EPA listing of the nation's worst uncontrolled or abandoned hazardous waste sites. NPL sites are targeted for possible long-term remedial action under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) of 1980. In addition, the NPL Report includes information concerning cleanup agreements between EPA and Potentially Responsible Parties (commonly called Records of Decision, or RODS), any liens filed against contaminated properties, as well as the past and current EPA budget expenditures tracked within the Superfund Consolidated Accomplishments Plan (SCAP).

CERCLIS

Date of Data: 06/06/97
Release Date: 06/13/97
Date on System: 06/27/97
US Environmental Protection Agency
Office of Solid Waste and Emergency Response
703/603-8881

Comprehensive Environmental Response, Compensation, and Liability Information System

The CERCLIS Database is a comprehensive listing of known or suspected uncontrolled or abandoned hazardous waste sites. These sites have either been investigated, or are currently under investigation by the U.S. EPA for the release, or threatened release of hazardous substances. Once a site is placed in CERCLIS, it may be subjected to several levels of review and evaluation, and ultimately placed on the National Priorities List (NPL). In addition to site events and milestone dates, the CERCLIS Report also contains financial information from the Superfund Consolidated Accomplishments Plan (SCAP).

RCRIS_TS

Date of Data: 04/04/97
Release Date: 06/02/97
Date on System: 08/15/97
US Environmental Protection Agency
Office of Solid Waste and Emergency Response
800/424-9346

Resource Conservation and Recovery Information System - Non-Corrective Action TSD Facilities

The RCRIS_TS Report contains information pertaining to facilities which either treat, store, or dispose of EPA regulated hazardous waste. The following information is also included in the RCRIS_TS Report:
- Information pertaining to the status of facilities tracked by the RCRA Administrative Action Tracking System (RAATS)
- Inspections & evaluations conducted by federal and state agencies
- All reported facility violations, the environmental statute(s) violated, and any proposed & actual penalties
- A complete listing of EPA regulated hazardous wastes which are generated or stored on-site

RCRIS_LG

Date of Data: 04/04/97
Release Date: 06/02/97
Date on System: 08/08/97
US Environmental Protection Agency
Office of Solid Waste and Emergency Response
800/424-9346

Resource Conservation and Recovery Information System - Large Quantity Generators

The RCRIS_LG Report contains information pertaining to facilities which either generate more than 1000kg of EPA regulated hazardous waste per month, or meet other applicable requirements of the Resource Conservation And Recovery Act. The following information is also included in the RCRIS_LG Report:
- Information pertaining to the status of facilities tracked by the RCRA Administrative Action Tracking System (RAATS)
- Inspections & evaluations conducted by federal and state agencies
- All reported facility violations, the environmental statute(s) violated, and any proposed & actual penalties
- Information pertaining to corrective actions undertaken by the facility or EPA
- A complete listing of EPA regulated hazardous wastes which are generated or stored on-site

ENVIRONMENTAL RISK INFORMATION & IMAGING SERVICES
DATABASE REFERENCE GUIDE

RCRIS_SG

Date of Data: 04/04/97
Release Date: 06/02/97
Date on System: 08/08/97
US Environmental Protection Agency
Office of Solid Waste and Emergency Response
800/424-9346

Resource Conservation and Recovery Information System - Small Quantity Generators

The RCRIS_SG Report contains information pertaining to facilities which either generate between 100kg and 1000kg of EPA regulated hazardous waste per month, or meet other applicable requirements of the Resource Conservation And Recovery Act. On advice of the U.S. EPA, ERIIS does not report so-called "RCRA Protective Filers." Protective Filers, commonly called Conditionally Exempt Small Quantity Generators (CESQG's), are facilities that have completed RCRA notification paperwork, but are not, in fact, subject to RCRA regulation. The determination of CESQG status is made by the U.S. EPA. The following information is also included in the RCRIS_SG Report:
- Information pertaining to the status of facilities tracked by the RCRA Administrative Action Tracking System (RAATS)
- Inspections & evaluations conducted by federal and state agencies
- All reported facility violations, the environmental statute(s) violated, and any proposed & actual penalties
- Information pertaining to corrective actions undertaken by the facility or EPA
- A complete listing of EPA regulated hazardous wastes which are generated or stored on-site

ERNS

Date of Data: 06/11/97
Release Date: 06/13/97
Date on System: 06/27/97
US Environmental Protection Agency
Office of Solid Waste and Emergency Response
202/260-2342

Emergency Response Notification System

ERNS is a national computer database system that is used to store information concerning the sudden and/or accidental release of hazardous substances, including petroleum, into the environment. The ERNS Reporting System contains preliminary information on specific releases, including the spill location, the substance released, and the responsible party. Please note that the information in the ERNS Report pertains only to those releases that occured between January 1, 1997 and June 11, 1997.

LRST

Date of Data: 06/01/97
Release Date: 07/07/97
Date on System: 08/22/97
NY Dept. of Environmental Conservation
Spill Prevention and Response Section
518/457-7363

New York Leaking Storage Tanks

The New York Leaking Storage Tank Report is a comprehensive listing of all leaking storage tank cases reported to The New York State Department of Environmental Conservation which have not yet been resolved. The information for the LST Report is extracted from the original spills list provided to ERIIS by the NYSDEC. Information pertaining to leaking storage tank cases which have been resolved can be provided upon request.

SWF

Date of Data: 12/31/96
Release Date: 02/26/97
Date on System: 03/14/97
NY Dept. of Environmental Conservation
Bureau of Solid Waste
518/457-2051

New York Active Solid Waste Facility Register

The New York Solid Waste Facility Register is a comprehensive listing of all active and inactive permitted solid waste landfills and processing facilities within the State of New York.

HWS

Date of Data: 04/01/96
Release Date: 12/20/96
Date on System: 02/14/97
NY Dept. of Environmental Conservation
Hazardous Waste Remediation Division
518/457-0747

New York Inactive Hazardous Waste Disposal Sites

The New York Inactive Hazardous Waste Disposal Sites List contains summary information pertaining to those facilities that are deemed potentially hazardous to the public health and welfare by the New York State Department of Environmental Conservation (NYSDEC).

NFRAP

Date of Data: 04/01/97
Release Date: 05/06/97
Date on System: 05/23/97
US Environmental Protection Agency
Office of Solid Waste and Emergency Response
703/603-8881

No Further Remedial Action Planned Sites

The No Further Remedial Action Planned Report (NFRAP), also known as the CERCLIS Archive, contains information pertaining to sites which have been removed from the U.S. EPA's CERCLIS Database. NFRAP sites may be sites where, following an initial investigation, either no contamination was found, contamination was removed quickly without need for the site to be placed on the NPL, or the contamination was not serious enough to require federal Superfund action or NPL consideration.

CBS

Date of Data: 06/01/97
Release Date: 07/07/97
Date on System: 08/15/97
NY Dept. of Environmental Conservation
Spill Prevention and Response Section
518/457-7363

New York Chemical Bulk Storage Tanks

The New York Chemical Bulk Storage Report contains information pertaining to active and inactive facilities that store regulated substances in aboveground storage tanks with capacities of 185 gallons or greater, and/or underground storage tanks of any size.

MOSF

Date of Data: 06/01/97
Release Date: 07/07/97
Date on System: 06/01/97
NY Dept. of Environmental Conservation
Spill Prevention and Response Section
518/457-7363

New York Major Oil Storage Facilities

The Major Oil Storage Facilities Report contains summary information on active and inactive facilities with petroleum storage capacities in excess of four-hundred thousand gallons.

PBS

Date of Data: 06/01/97
Release Date: 07/07/97
Date on System: 08/15/97
NY Dept. of Environmental Conservation
Spill Prevention and Response Section
518/457-7363

New York Petroleum Bulk Storage Tanks

The New York Petroleum Bulk Storage Report is a comprehensive listing of all reported active and inactive facilities that have petroleum storage capacities in excess of 1100 gallons, and less than four hundred thousand gallons. ERIIS has obtained the PBS information from the Delegated Counties in the State of New York. The dates of The information for the specific counties are as follows:

Cortland	03/24/97
Nassau	02/04/97
Rockland	03/25/97
Suffolk	02/21/97

SPILLS

Date of Data: 06/01/97
Release Date: 07/07/97
Date on System: 08/22/97
NY Dept. of Environmental Conservation
Spill Prevention and Response Section
518/457-0722

New York Spills Report

The New York Spills Report is a comprehensive listing of all hazardous materials spills reported to The New York State Department of Environmental Conservation which have not yet been resolved. Information pertaining to spills which have been resolved can be provided upon request.

If a selected database does not appear on this list, it is not available for the subject property's state.

Summary of Plottable sites

ERIIS Report #190681A

Sep 9, 1997

ERIIS ID. DATABASE	FACILITY ADDRESS COMMENTS	DISTANCE FROM SITE	DIRECTION FROM SITE	MAP ID
	0 - 1/4 Miles			
36007000050 RCRIS_LG	Alumax Extrusions Inc 320 S Roberts Rd Dunkirk, NY 14048-2810 County: Chautauqua	0.21 Mi	NORTHWEST	2
36007002220 RCRIS_LG	Roblin Steel Industries 320 S Roberts Rd Dunkirk, NY 14048-2810 County: Chautauqua	0.21 Mi	NORTHWEST	2
36048019661 PBS	Ellmans Garage 4 E Doughty St Dunkirk, NY 14048-2926 County: Chautauqua	0.21 Mi	SOUTHEAST	1
36047001497 CBS	Alumax Extrusions Inc 320 S Roberts Rd Dunkirk, NY 14048-2810 County: Chautauqua	0.22 Mi	NORTHWEST	3
36048020183 PBS	Alumax Extrusions, Inc. 320 S Roberts Rd Dunkirk, NY 14048-2810 County: Chautauqua	0.22 Mi	NORTHWEST	3
36007001396 RCRIS_LG	Dunkirk Radiator Corp 85 Middle Rd Dunkirk, NY 14048-1311 County: Chautauqua	0.23 Mi	NORTHWEST	5
36048020435 PBS	Talcott Street Warehouse 26-38 E Talcott St Dunkirk, NY 14048-2854 County: Chautauqua	0.23 Mi	SOUTHWEST	4
36047001466 CBS	Talcott Warehouse 26-38 E Talcott St Dunkirk, NY 14048-2854 County: Chautauqua	0.23 Mi	SOUTHWEST	4
	1/2 - 1 Miles			
36053000723 HWS	Dunkirk Landfill South Roberts Road Dunkirk, NY 14048 County: Chautauqua	0.90 Mi	SOUTHEAST	6

ERIIS Report #190681A Sep 9, 1997

ERIIS ID / EPA ID	FACILITY	ADDRESS	MAP ID
36007000050 NYD000632109	Alumax Extrusions Inc DISTANCE FROM SITE: 0.21 Miles DIRECTION FROM SITE: Northwest	320 S Roberts Rd Dunkirk, NY 14048-2810 County: Chautauqua	2

Facility Is Not Reported In Raats

FACILITY VIOLATIONS:

1. DATE DETERMINED: 01/15/87 DATE RESOLVED: 10/27/87
   AREA OF VIOLATION: Generator-all Requirements

FACILITY EVALUATIONS:

1. EVALUATION DATE: 01/15/87 EVALUATION AGENCY: State
   TYPE OF EVALUATION: Non-financial Record Review
   AREA(S) OF EVALUATION: Generator-all Requirements

FACILITY ENFORCEMENTS:

1. ENFORCEMENT DATE: 01/15/1987 ENFORCEMENT AGENCY: State
   TYPE OF ACTION: 3008(a) Compliance Order, Final Formal Administrative Action
   PENALTY(S): $500 Final Monetary Penalty

HAZARDOUS WASTES:

1. WASTE CODE: D000 AMOUNT OF WASTE: .00000
   SOURCE OF INFO: Notification
2. WASTE CODE: D007 AMOUNT OF WASTE: .00000
   SOURCE OF INFO: Notification
3. WASTE CODE: F003 AMOUNT OF WASTE: .00000
   SOURCE OF INFO: Notification
4. WASTE CODE: F005 AMOUNT OF WASTE: .00000
   SOURCE OF INFO: Notification
5. WASTE CODE: F017 AMOUNT OF WASTE: .00000
   SOURCE OF INFO: Notification
6. WASTE CODE: F019 AMOUNT OF WASTE: .00000
   SOURCE OF INFO: Notification

36007002220 NYD013512462	Roblin Steel Industries DISTANCE FROM SITE: 0.21 Miles DIRECTION FROM SITE: Northwest	320 S Roberts Rd Dunkirk, NY 14048-2810 County: Chautauqua	2

Facility Is Not Reported In Raats

HAZARDOUS WASTES:

1. WASTE CODE: K061 AMOUNT OF WASTE: .00000
   SOURCE OF INFO: Notification

36007001396 NYD002101137	Dunkirk Radiator Corp DISTANCE FROM SITE: 0.23 Miles DIRECTION FROM SITE: Northwest	85 Middle Rd Dunkirk, NY 14048-1311 County: Chautauqua	5

Facility Is Not Reported In Raats

HAZARDOUS WASTES:

1. WASTE CODE: F017 AMOUNT OF WASTE: .00000
   SOURCE OF INFO: Notification

ERIIS ENVIRONMENTAL DATA REPORT
NEW YORK INACTIVE HAZARDOUS WASTE DISPOSAL SITES
HWS - PLOTTABLE SITES - PAGE 1

ERIIS Report #190681A Sep 9, 1997

ERIIS ID / EPA ID / SITE CODE	FACILITY	ADDRESS	MAP ID
36053000723 NYD094176310 907003	Dunkirk Landfill DISTANCE FROM SITE: 0.90 Miles DIRECTION FROM SITE: Southeast	South Roberts Road Dunkirk, NY 14048 COUNTY: Chautauqua	6

SITE TYPE(X): DUMP STRUCTURE LAGOON LANDFILL X TREATMENT POND
ACRES: 27
CLASSIFICATION: No Significant Threat - Action May Be
REMEDIAL ACTION: Not Reported

LEGAL ACTION: None
ENFORCEMENT STATUS: Not Reported
STATE LEGAL ACTION: No
FEDERAL LEGAL ACTION: No
REMEDIAL ACTION PROPOSED: No
REMEDIAL ACTION UNDER DESIGN: No
REMEDIAL ACTION IN PROGRESS: No
REMEDIAL ACTION COMPLETED: No

SITE DESCRIPTION: The City Of Dunkirk Operated This Site As A Municipal Landfill From 1966 To 1973. Various Types Of Household And Industrial Wastes Were Accepted During The Period. These Include Iron Oxide Slag And Dust/furnace Slag, Paint, Ink Wastes, Steel Plant Sludge, Neutralized Acids, Oil Wastes, Air Polution Control Fines Etc. The Property Was Leased To The Chautauqua County Dept. Of Public Works (ccdpw) And Continued Operation As A Landfill Until 1978 When It Was Closed In Accordance With A Nysdec Closure Plan. In 1979, Quarterly Surface Water And Groundwater Sampling Was Initiated By The Ccdpw. Sampling Has Indicated Elevated Levels Of Ph, Metals, Total Dissolved Solids, Volatile Organic Compounds, And Semi-volatile Organic Compounds. A Preliminary Site Assessment (psa) Was Completed In 1993 And A Final Report Has Been Issued. This Site Does Not Presently Constitute A Threat To The Environment.
ASSESSMENT OF ENVIRONMENTAL PROBLEMS: Leachate Is Entering Surface Waters And Leaving The Site. Monitoring Wells Have Shown Some Groundwater Contamination. A More Suitable Cap Is Needed. Sampling Indicates Methylene Chloride In The Surface Water, And Arsenic And Several Semi-volatiles In The Sediment.

OWNER: Chautauqua County Dpw
CONTACT: Not Reported
OWNER TYPE: Operator During Use
OWNER ADDRESS: 3889 Towerville Road
Jamestown, NY 147019653

OWNER: City Of Dunkirk
CONTACT: Not Reported
OWNER TYPE: Current Owner
OWNER ADDRESS: Town Hall, Willow Pond
Dunkirk, NY 14048

ERIIS ENVIRONMENTAL DATA REPORT
NEW YORK CHEMICAL BULK STORAGE TANKS
CBS - PLOTTABLE SITES - PAGE 1

ERIIS Report #190681A Sep 9, 1997

ERIIS ID. / CBS NO.	FACILITY	ADDRESS	MAP ID
36047001497 9-000293	Alumax Extrusions Inc DISTANCE FROM SITE: 0.22 Miles DIRECTION FROM SITE: Northwest	320 S Roberts Rd Dunkirk, NY 14048-2810 COUNTY: Chautauqua	3

OPERATOR: Wayne Martin FACILITY PHONE: (716) 366-6065

STATUS: Inactive PBS NO: Not Reported CERTIFICATE DATE: 08/26/92
SPDES NO: Not Reported EXPIRATION DATE: 11/02/94

TYPE OF FACILITY: Manufacturing

TANK NO.: 002 CAPACITY (GAL): 5000 % HAZ: 20
SUBSTANCE DESC: Single Hazardous Substance On Dec List
TANK STATUS: Closed - In Place
TANK LOCATION: Aboveground On Crib, Rack, Or Cradle

ERIIS ID. / CBS NO.	FACILITY	ADDRESS	MAP ID
36047001466 9-000260	Talcott Warehouse DISTANCE FROM SITE: 0.23 Miles DIRECTION FROM SITE: Southwest	26-38 E Talcott St Dunkirk, NY 14048-2854 COUNTY: Chautauqua	4

OPERATOR: Richard Frey FACILITY PHONE: (716) 366-5450

STATUS: Active PBS NO: Not Reported CERTIFICATE DATE: 07/18/95
SPDES NO: Not Reported EXPIRATION DATE: 08/08/97

TYPE OF FACILITY: Other

TANK NO.: 001 CAPACITY (GAL): 900 % HAZ: 100
SUBSTANCE DESC: Single Hazardous Substance On Dec List
TANK STATUS: In-service
TANK LOCATION: Aboveground

ERIIS ENVIRONMENTAL DATA REPORT
NEW YORK PETROLEUM BULK STORAGE TANKS
PBS - PLOTTABLE SITES - PAGE 1

ERIIS Report #190681A — Sep 9, 1997

ERIIS ID / PBS NO. / CBS NO.	FACILITY	ADDRESS	MAP ID
36048019661 9-120057	Ellmans Garage DISTANCE FROM SITE: 0.21 Miles DIRECTION FROM SITE: Southeast	4 E Doughty St Dunkirk, NY 14048-2926 COUNTY: Chautauqua	1

FACILITY TYPE: Retail Gasoline Sales
CONTACT: James V Ellman (716) 366-0808
NO. OF TANKS: 2
TOTAL CAPACITY (GAL): 6000
SITE STATUS: Active
CERTIFICATE DATE: 07/02/92
EXPIRATION DATE: 08/24/97

TANK ID: 1 — INSTAL. DATE: 06/85 — CAPACITY (GAL.): 3000
TANK STATUS: In-service — TANK LOCATION: Underground
PRODUCT STORED: Leaded Gasoline
TANK TYPE: Steel/carbon Steel

TANK ID: 2 — INSTAL. DATE: 06/85 — CAPACITY (GAL.): 3000
TANK STATUS: In-service — TANK LOCATION: Underground
PRODUCT STORED: Unleaded Gasoline
TANK TYPE: Steel/carbon Steel

36048020183 9-437018	Alumax Extrusions, Inc. DISTANCE FROM SITE: 0.22 Miles DIRECTION FROM SITE: Northwest	320 S Roberts Rd Dunkirk, NY 14048-2810 COUNTY: Chautauqua	3

FACILITY TYPE: Manufacturing
CONTACT: Alumax Extrusions, Inc. (716) 366-6063
NO. OF TANKS: 0
TOTAL CAPACITY (GAL): 0
SITE STATUS: Inactive
CERTIFICATE DATE: 04/08/93
EXPIRATION DATE: 06/28/98

TANK ID: 1 — INSTAL. DATE: 05/86 — CAPACITY (GAL.): 10000
TANK STATUS: Closed - Removed — TANK LOCATION: Underground
PRODUCT STORED: Diesel
TANK TYPE: Steel/carbon Steel

36048020435 9-465488	Talcott Street Warehouse DISTANCE FROM SITE: 0.23 Miles DIRECTION FROM SITE: Southwest	26-38 E Talcott St Dunkirk, NY 14048-2854 COUNTY: Chautauqua	4

FACILITY TYPE:
CONTACT: Lakeside Warehouse Corp (716) 366-5450
NO. OF TANKS: 0
TOTAL CAPACITY (GAL): 0
SITE STATUS: Inactive
CERTIFICATE DATE: 12/06/88
EXPIRATION DATE: 12/06/93

TANK ID: 1 — INSTAL. DATE: 12/65 — CAPACITY (GAL.): 6000
TANK STATUS: Closed Before April 1, 1991 — TANK LOCATION: Underground
PRODUCT STORED: Nos. 1, 2 Or 4 Fuel Oil
TANK TYPE: Steel/carbon Steel

TANK ID: 2 — INSTAL. DATE: 12/65 — CAPACITY (GAL.): 6000
TANK STATUS: Closed Before April 1, 1991 — TANK LOCATION: Underground
PRODUCT STORED: Nos. 1, 2 Or 4 Fuel Oil
TANK TYPE: Steel/carbon Steel

TANK ID: 3 — INSTAL. DATE: 12/75 — CAPACITY (GAL.): 25000
TANK STATUS: Closed - Removed — TANK LOCATION: Underground
PRODUCT STORED: Nos. 1, 2 Or 4 Fuel Oil
TANK TYPE: Steel/carbon Steel

TANK ID: 4 — INSTAL. DATE: 12/78 — CAPACITY (GAL.): 25000
TANK STATUS: Closed - Removed — TANK LOCATION: Underground
PRODUCT STORED: Nos. 1, 2 Or 4 Fuel Oil
TANK TYPE: Steel/carbon Steel

Summary of Unplottable sites

ERIIS Report #190681A Sep 9, 1997

ERIIS ID. DATABASE	FACILITY ADDRESS COMMENTS	SELECTED BY
36008000034 RCRIS_SG	Reid Petroleum - Yellow Goose 253 Lakeshore Rd Dunkirk, NY 14048 County: Chautauqua	ZIP code
36048020493 PBS	Dunkirk Yellow Goose 253-255 Lakeshore Road Dunkirk, NY 14048 County: Chautauqua	ZIP code
36039000308 NFRAP	Roblin Steel 320 South Road Dunkirk, NY 14048 County: Chautauqua	ZIP code
36048020687 PBS	Genesee Leroy Stone Corp Plt31 Bennett Rd Dunkirk, NY 14048 County: Chautauqua	ZIP code
36007006824 RCRIS_LG	Niagara Mohawk Station 99 Bennett Rd Dunkirk, NY 14048 County: Chautauqua	ZIP code
36048020780 PBS	D & F Plaza Wine Shop Bennett Road Dunkirk, NY 14048 County: Chautauqua	ZIP code
36007005407 RCRIS_LG	East Dunkirk #63 Sub Bookstaver Ave Dunkirk, NY 14048 County: Chautauqua	ZIP code
36007011454 RCRIS_LG	Nys Thruway Auth Brigham Rd Over Thruway Dunkirk, NY 14048 County: Chautauqua	ZIP code
36007001404 RCRIS_LG	C P S E Lake Rd Rte 5 Dunkirk, NY 14048 County: Chautauqua	ZIP code
36047001315 CBS	Cps (e. Lake Shore Dr. Fac.) East Lake Shore Drive-rte.5 Dunkirk, NY 14048 County: Chautauqua	ZIP code
36007013725 RCRIS_LG	Nys Thruway Auth Exit 59 Dunkirk Maint Area Dunkirk, NY 14048 County: Chautauqua	ZIP code
36007000284 RCRIS_LG	Sunoco Service Station I-90 & Bennet Rd Dunkirk, NY 14048 County: Chautauqua	ZIP code
36048017797 PBS	School Number 7-garage Lake Shore Drive East (serval Street) Dunkirk, NY 14048 County: Chautauqua	ZIP code
36048018632 [illegible]S	City Of Dunkirk-central Garage Lucas Avenue Dunkirk, NY 14048 County: Chautauqua	ZIP code

Summary of Unplottable sites

ERIIS Report #190681A Sep 9, 1997

ERIIS ID. DATABASE	FACILITY ADDRESS COMMENTS	SELECTED BY
36007012213 RCRIS_LG	Nys Thruway Auth Main St Mp 468.70 Eb Dunkirk, NY 14048 County: Chautauqua	ZIP code
36007012214 RCRIS_LG	Nys Thruway Auth Main St Mp 468.71 Wb Dunkirk, NY 14048 County: Chautauqua	ZIP code
36048019141 PBS	Genesee Leroy Stone Corp Middle Rd Dunkirk, NY 14048 County: Chautauqua	ZIP code
36048020297 PBS	H. Olsen & Sons Contractors,in Middle Rd Dunkirk, NY 14048 County: Chautauqua	ZIP code
36048047494 PBS	Great Circle Aviation Middle Road Dunkirk, NY 14048 County: Chautauqua	ZIP code
36007012215 RCRIS_LG	Nys Thruway Auth Mile Post 470.61 Eb Over Dunkirk, NY 14048 County: Chautauqua	ZIP code
36007012216 RCRIS_LG	Nys Thruway Auth Mile Post 470.62 Wb Over Dunkirk, NY 14048 County: Chautauqua	ZIP code
36048019305 PBS	Dunkirk Aviation Sales & Serv Inc. Municipal Airport Middle Rd Dunkirk, NY 14048 County: Chautauqua	ZIP code
36048018884 PBS	J & L Well Service Co Newell Rd Dunkirk, NY 14048 County: Chautauqua	ZIP code
36048018935 PBS	Van Buren Pennzoil Rd 2 West Lake Rd Dunkirk, NY 14048 County: Chautauqua	ZIP code
36007011453 RCRIS_LG	Nys Thruway Auth Roberts Rd Over Thruway Dunkirk, NY 14048 County: Chautauqua	ZIP code
36007010250 RCRIS_LG	Nysdot Bin 1001240 Rte 5 Over Canadaway Crk Dunkirk, NY 14048 County: Chautauqua	ZIP code
36007013770 RCRIS_LG	Nysdot Bin 1027890 Rte 60 At I-90 Dunkirk, NY 14048 County: Chautauqua	ZIP code
36039000307 FRAP	Dunkirk Lf South Roberts Rd Dunkirk, NY 14048 County: Chautauqua	ZIP code

Summary of Unplottable sites

ERIIS Report #190681A Sep 9, 1997

ERIIS ID. DATABASE	FACILITY ADDRESS COMMENTS	SELECTED BY
36008000332 RCRIS_SG	Great Lakes Color Printing Corporation Stegelski Ave Dunkirk, NY 14048 County: Chautauqua	ZIP code
36007002736 RCRIS_LG	Chemical Process & Supply Stegelski Rd Dunkirk, NY 14048 County: Chautauqua	ZIP code
36007013625 RCRIS_LG	Norfolk & Western Railway Co Temple Rd Mp B43 65 1/4 Mi W Dunkirk, NY 14048 County: Chautauqua	ZIP code
36007011455 RCRIS_LG	Nys Thruway Auth Temple St Over Thruway Dunkirk, NY 14048 County: Chautauqua	ZIP code
36048020350 PBS	A. Sam & Sons Produce Co.,inc. West Lake Road Dunkirk, NY 14048 County: Chautauqua	ZIP code
36007006808 RCRIS_LG	Niagara Mohawk Station 50 Willowbrook Ave Dunkirk, NY 14048 County: Chautauqua	ZIP code
36039000309 NFRAP	Special Metals Corp Willowbrook Ave Dunkirk, NY 14048 County: Chautauqua	ZIP code
36007003088 RCRIS_LG	Special Metals Corp Willowbrook Ave Dunkirk, NY 14048 County: Chautauqua	ZIP code
36048019884 PBS	Dunkirk Sewage Treatment Plant Wright Park Dr Dunkirk, NY 14048 County: Chautauqua	ZIP code
36018001835 SWF	Chautauqua Co. Dpw Slf NY County: Chautauqua	County
36018001842 SWF	Chautauqua Landfill NY County: Chautauqua	County
36018001844 SWF	Dunkirk Radiator NY County: Chautauqua	County
36018002030 SWF	Dunkirk T.s. NY County: Chautauqua	County
36018001820 SWF	Ellery T.s. (t) NY County: Chautauqua	County

Summary of Unplottable sites

ERIIS Report #190681A Sep 9, 1997

ERIIS ID. DATABASE	FACILITY ADDRESS COMMENTS	SELECTED BY
36018001845 SWF	Fredonia Slf NY County: Chautauqua	County
36018001843 SWF	Hanover Slf NY County: Chautauqua	County
36018001839 SWF	Kiantone Lf NY County: Chautauqua	County
36018001824 SWF	Lily Dale Rural T.s. NY County: Chautauqua	County
36018001850 SWF	South Chautauqua T.s. NY County: Chautauqua	County
36018001816 SWF	Villenova Rural T.s. NY County: Chautauqua	County
36018002045 SWF	Westfield T.s. NY County: Chautauqua	County
36018001849 SWF	West Chautauqua County Route 76, Southern Tier Expr. NY County: Chautauqua	County

ERIIS ENVIRONMENTAL DATA REPORT
RESOURCE CONSERVATION AND RECOVERY INFORMATION SYSTEM - LARGE QUANTITY GENERATORS
RCRIS_LG - UNPLOTTABLE SITES

ERIIS Report #190681A Sep 9, 1997

ERIIS ID / EPA ID	FACILITY	ADDRESS
36007000284 NYD000699181	Sunoco Service Station	I-90 & Bennet Rd Dunkirk, NY 14048 County: Chautauqua

Facility Is Not Reported In Raats

HAZARDOUS WASTES:

1.	WASTE CODE:	D000	AMOUNT OF WASTE:	.00000
	SOURCE OF INFO:	Notification		
2.	WASTE CODE:	D001	AMOUNT OF WASTE:	.00000
	SOURCE OF INFO:	Notification		

36007001404 NYD002102002	C P S	E Lake Rd Rte 5 Dunkirk, NY 14048 County: Chautauqua

Facility Is Not Reported In Raats

HAZARDOUS WASTES:

1.	WASTE CODE:	D001	AMOUNT OF WASTE:	.00000
	SOURCE OF INFO:	Notification		
2.	WASTE CODE:	F003	AMOUNT OF WASTE:	.00000
	SOURCE OF INFO:	Notification		
3.	WASTE CODE:	F005	AMOUNT OF WASTE:	.00000
	SOURCE OF INFO:	Notification		
4.	WASTE CODE:	F010	AMOUNT OF WASTE:	.00000
	SOURCE OF INFO:	Notification		
5.	WASTE CODE:	F017	AMOUNT OF WASTE:	.00000
	SOURCE OF INFO:	Notification		

36007002736 NYD047350350	Chemical Process & Supply	Stegelski Rd Dunkirk, NY 14048 County: Chautauqua

Facility Is Not Reported In Raats

HAZARDOUS WASTES:

1.	WASTE CODE:	D001	AMOUNT OF WASTE:	.00000
	SOURCE OF INFO:	Notification		

36007003088 NYD057982993	Special Metals Corp	Willowbrook Ave Dunkirk, NY 14048 County: Chautauqua

Facility Is Not Reported In Raats

HAZARDOUS WASTES:

1.	WASTE CODE:	D001	AMOUNT OF WASTE:	.00000
	SOURCE OF INFO:	Notification		

36007005407 NYD980782411	East Dunkirk #63 Sub	Bookstaver Ave Dunkirk, NY 14048 County: Chautauqua

Facility Is Not Reported In Raats

HAZARDOUS WASTES:

ERIIS ENVIRONMENTAL DATA REPORT
RESOURCE CONSERVATION AND RECOVERY INFORMATION SYSTEM - LARGE QUANTITY GENERATORS
RCRIS_LG - UNPLOTTABLE SITES

ERIIS Report #190681A Sep 9, 1997

ERIIS ID
EPA ID FACILITY ADDRESS

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1. WASTE CODE: D000 AMOUNT OF WASTE: .00000
SOURCE OF INFO: Notification
2. WASTE CODE: X002 AMOUNT OF WASTE: .00000
SOURCE OF INFO: Notification

36007006808 Niagara Mohawk Station 50 Willowbrook Ave
NYD981488604 Dunkirk, NY 14048
County: Chautauqua

Facility Is Not Reported In Raats

HAZARDOUS WASTES:

1. WASTE CODE: D000 AMOUNT OF WASTE: .00000
SOURCE OF INFO: Notification

36007006824 Niagara Mohawk Station 99 Bennett Rd
NYD981488794 Dunkirk, NY 14048
County: Chautauqua

Facility Is Not Reported In Raats

HAZARDOUS WASTES:

1. WASTE CODE: D000 AMOUNT OF WASTE: .00000
SOURCE OF INFO: Notification

36007010250 Nysdot Bin 1001240 Rte 5 Over Canadaway Crk
NYD986952265 Dunkirk, NY 14048
County: Chautauqua

Facility Is Not Reported In Raats

HAZARDOUS WASTES:

1. WASTE CODE: D000 AMOUNT OF WASTE: .00000
SOURCE OF INFO: Notification
2. WASTE CODE: D008 AMOUNT OF WASTE: .00000
SOURCE OF INFO: Notification
3. WASTE CODE: None AMOUNT OF WASTE: .00000
SOURCE OF INFO: Epa Inspection

36007011453 Nys Thruway Auth Roberts Rd Over Thruway
NYD986998706 Dunkirk, NY 14048
County: Chautauqua

Facility Is Not Reported In Raats

HAZARDOUS WASTES:

1. WASTE CODE: D000 AMOUNT OF WASTE: .00000
SOURCE OF INFO: Notification
2. WASTE CODE: D008 AMOUNT OF WASTE: .00000
SOURCE OF INFO: Notification

ERIIS ENVIRONMENTAL DATA REPORT
RESOURCE CONSERVATION AND RECOVERY INFORMATION SYSTEM - LARGE QUANTITY GENERATORS
RCRIS_LG - UNPLOTTABLE SITES

ERIIS Report #190681A Sep 9, 1997

ERIIS ID / EPA ID	FACILITY	ADDRESS
36007011454 NYD986998714	Nys Thruway Auth	Brigham Rd Over Thruway Dunkirk, NY 14048 County: Chautauqua

Facility Is Not Reported In Raats

HAZARDOUS WASTES:

1.	WASTE CODE:	D000	AMOUNT OF WASTE:	.00000
	SOURCE OF INFO:	Notification		
2.	WASTE CODE:	D008	AMOUNT OF WASTE:	.00000
	SOURCE OF INFO:	Notification		

36007011455 NYD986998722	Nys Thruway Auth	Temple St Over Thruway Dunkirk, NY 14048 County: Chautauqua

Facility Is Not Reported In Raats

HAZARDOUS WASTES:

1.	WASTE CODE:	D000	AMOUNT OF WASTE:	.00000
	SOURCE OF INFO:	Notification		
2.	WASTE CODE:	D008	AMOUNT OF WASTE:	.00000
	SOURCE OF INFO:	Notification		

36007012213 NYD987032661	Nys Thruway Auth	Main St Mp 468.70 Eb Dunkirk, NY 14048 County: Chautauqua

Facility Is Not Reported In Raats

HAZARDOUS WASTES:

1.	WASTE CODE:	D000	AMOUNT OF WASTE:	.00000
	SOURCE OF INFO:	Notification		
2.	WASTE CODE:	D008	AMOUNT OF WASTE:	.00000
	SOURCE OF INFO:	Notification		

36007012214 NYD987032679	Nys Thruway Auth	Main St Mp 468.71 Wb Dunkirk, NY 14048 County: Chautauqua

Facility Is Not Reported In Raats

HAZARDOUS WASTES:

1.	WASTE CODE:	D000	AMOUNT OF WASTE:	.00000
	SOURCE OF INFO:	Notification		
2.	WASTE CODE:	D008	AMOUNT OF WASTE:	.00000
	SOURCE OF INFO:	Notification		

36007012215 NYD987032687	Nys Thruway Auth	Mile Post 470.61 Eb Over Dunkirk, NY 14048 County: Chautauqua

Facility Is Not Reported In Raats

HAZARDOUS WASTES:

ERIIS ENVIRONMENTAL DATA REPORT
RESOURCE CONSERVATION AND RECOVERY INFORMATION SYSTEM - LARGE QUANTITY GENERATORS
RCRIS_LG - UNPLOTTABLE SITES

ERIIS Report #190681A Sep 9, 1997

ERIIS ID / EPA ID	FACILITY	ADDRESS

1. WASTE CODE: D000 AMOUNT OF WASTE: .00000
   SOURCE OF INFO: Notification
2. WASTE CODE: D008 AMOUNT OF WASTE: .00000
   SOURCE OF INFO: Notification

36007012216 Nys Thruway Auth
NYD987032695
Mile Post 470.62 Wb Over
Dunkirk, NY 14048
County: Chautauqua

Facility Is Not Reported In Raats

HAZARDOUS WASTES:

1. WASTE CODE: D000 AMOUNT OF WASTE: .00000
   SOURCE OF INFO: Notification
2. WASTE CODE: D008 AMOUNT OF WASTE: .00000
   SOURCE OF INFO: Notification

36007013625 Norfolk & Western Railway Co
NY0000693549
Temple Rd Mp B43 65 1/4 Mi W
Dunkirk, NY 14048
County: Chautauqua

Facility Is Not Reported In Raats

HAZARDOUS WASTES:

1. WASTE CODE: D000 AMOUNT OF WASTE: .00000
   SOURCE OF INFO: Notification
2. WASTE CODE: D008 AMOUNT OF WASTE: .00000
   SOURCE OF INFO: Notification

36007013725 Nys Thruway Auth
NY0000964585
Exit 59 Dunkirk Maint Area
Dunkirk, NY 14048
County: Chautauqua

Facility Is Not Reported In Raats

HAZARDOUS WASTES:

1. WASTE CODE: D000 AMOUNT OF WASTE: .00000
   SOURCE OF INFO: Notification
2. WASTE CODE: D008 AMOUNT OF WASTE: .00000
   SOURCE OF INFO: Notification

36007013770 Nysdot Bin 1027890
NY0001015734
Rte 60 At I-90
Dunkirk, NY 14048
County: Chautauqua

Facility Is Not Reported In Raats

HAZARDOUS WASTES:

1. WASTE CODE: D000 AMOUNT OF WASTE: .00000
   SOURCE OF INFO: Notification
2. WASTE CODE: D008 AMOUNT OF WASTE: .00000
   SOURCE OF INFO: Notification

ERIIS ENVIRONMENTAL DATA REPORT
RESOURCE CONSERVATION AND RECOVERY INFORMATION SYSTEM - SMALL QUANTITY GENERATORS
RCRIS_SG - UNPLOTTABLE SITES

ERIIS Report #190681A — Sep 9, 1997

ERIIS ID / EPA ID	FACILITY	ADDRESS
36008000034 NYD000699173	Reid Petroleum - Yellow Goose	253 Lakeshore Rd Dunkirk, NY 14048 County: Chautauqua

Facility Is Not Reported In Raats

HAZARDOUS WASTES:

1.	WASTE CODE:	D000	AMOUNT OF WASTE:	.00000
	SOURCE OF INFO:	Notification		
2.	WASTE CODE:	D001	AMOUNT OF WASTE:	.00000
	SOURCE OF INFO:	Notification		
3.	WASTE CODE:	D018	AMOUNT OF WASTE:	.00000
	SOURCE OF INFO:	Notification		

36008000332 NYD002113694	Great Lakes Color Printing Corporation	Stegelski Ave Dunkirk, NY 14048 County: Chautauqua

Facility Is Not Reported In Raats

FACILITY VIOLATIONS:

1.	DATE DETERMINED:	03/24/88	DATE RESOLVED:	09/27/88
	AREA OF VIOLATION:	Generator-all Requirements		

FACILITY EVALUATIONS:

1.	EVALUATION DATE:	03/24/88	EVALUATION AGENCY:	State
	TYPE OF EVALUATION:	Compliance Evaluation Inspection		
	AREA(S) OF EVALUATION:	Generator-all Requirements Generator-land Ban Requirements		

FACILITY ENFORCEMENTS:

1.	ENFORCEMENT DATE:	05/02/1988	ENFORCEMENT AGENCY:	State
	TYPE OF ACTION:	3008(a) Compliance Order, Inital Formal Administrative Action		
	PENALTY(S):			
2.	ENFORCEMENT DATE:	08/17/1988	ENFORCEMENT AGENCY:	State
	TYPE OF ACTION:	3008(a) Compliance Order, Final Formal Administrative Action		
	PENALTY(S):			

HAZARDOUS WASTES:

1.	WASTE CODE:	D000	AMOUNT OF WASTE:	.00000
	SOURCE OF INFO:	Notification		
2.	WASTE CODE:	D001	AMOUNT OF WASTE:	.00000
	SOURCE OF INFO:	Notification		
3.	WASTE CODE:	D002	AMOUNT OF WASTE:	.00000
	SOURCE OF INFO:	Notification		

ERIIS ENVIRONMENTAL DATA REPORT
NEW YORK ACTIVE SOLID WASTE FACILITY REGISTER
SWF - UNPLOTTABLE SITES

ERIIS Report #190681A — Sep 9, 1997

ERIIS ID / FACILITY ID	FACILITY	ADDRESS
36018001816 07R02	Villenova Rural T.s.	Not Reported NY COUNTY: Chautauqua

PHONE #: Not Reported
OPERATOR NAME: Not Reported
FACILITY ACTIVITY: Small Transfer Station (<50,000 Cy Annually)
WASTE TYPE: Residential
REGULATORY STATUS: None
PERMIT NO:
ISSUE DATE: Not Reported

36018001820 07R06	Ellery T.s. (t)	Not Reported NY COUNTY: Chautauqua

PHONE #: Not Reported
OPERATOR NAME: Chautauqua County Dpw
FACILITY ACTIVITY: Small Transfer Station (<50,000 Cy Annually)
WASTE TYPE: Residential
REGULATORY STATUS: Sapa
PERMIT NO: 9063600006000050
ISSUE DATE: Not Reported

36018001824 07R10	Lily Dale Rural T.s.	Not Reported NY COUNTY: Chautauqua

PHONE #: Not Reported
OPERATOR NAME: Not Reported
FACILITY ACTIVITY: Small Transfer Station (<50,000 Cy Annually)
WASTE TYPE: Residential
REGULATORY STATUS: None
PERMIT NO:
ISSUE DATE: Not Reported

36018001835 07S05	Chautauqua Co. Dpw Slf	Not Reported NY COUNTY: Chautauqua

PHONE #: Not Reported
OPERATOR NAME: Not Reported
FACILITY ACTIVITY: Mixed Solid Waste Landfill
WASTE TYPE:
REGULATORY STATUS: None
PERMIT NO:
ISSUE DATE: Not Reported

36018001839 07S09	Kiantone Lf	Not Reported NY COUNTY: Chautauqua

PHONE #: Not Reported
OPERATOR NAME: Not Reported
FACILITY ACTIVITY: Mixed Solid Waste Landfill
WASTE TYPE:
REGULATORY STATUS: None
PERMIT NO:
ISSUE DATE: Not Reported

36018001842 07S12	Chautauqua Landfill	Not Reported NY COUNTY: Chautauqua

PHONE #: (716) 985-4785
OPERATOR NAME: Richard Johnson
FACILITY ACTIVITY: Mixed Solid Waste Landfill
WASTE TYPE: Residential, Demolition, Asbestos, Sludge, Industrial, Cont. Soil
REGULATORY STATUS: Permit
PERMIT NO: 9063600006000050
ISSUE DATE: 10/31/96

36018001843 07S13	Hanover Slf	Not Reported NY COUNTY: Chautauqua

PHONE #: Not Reported
OPERATOR NAME: Not Reported
FACILITY ACTIVITY: Mixed Solid Waste Landfill
WASTE TYPE:
REGULATORY STATUS: None
PERMIT NO:
ISSUE DATE: Not Reported

ERIIS ENVIRONMENTAL DATA REPORT
NEW YORK ACTIVE SOLID WASTE FACILITY REGISTER
SWF - UNPLOTTABLE SITES

ERIIS Report #190681A — Sep 9, 1997

ERIIS ID / FACILITY ID	FACILITY	ADDRESS
36018001844 07S14	Dunkirk Radiator	Not Reported NY COUNTY: Chautauqua

PHONE #: Not Reported
OPERATOR NAME: Not Reported
FACILITY ACTIVITY: Mixed Solid Waste Landfill
WASTE TYPE:
REGULATORY STATUS: None
PERMIT NO:
ISSUE DATE: Not Reported

36018001845 07S15	Fredonia Slf	Not Reported NY COUNTY: Chautauqua

PHONE #: Not Reported
OPERATOR NAME: Not Reported
FACILITY ACTIVITY: Mixed Solid Waste Landfill
WASTE TYPE:
REGULATORY STATUS: None
PERMIT NO:
ISSUE DATE: Not Reported

36018001849 07T18	West Chautauqua County	Route 76, Southern Tier Expr. NY COUNTY: Chautauqua

PHONE #: (716) 985-4785
OPERATOR NAME: George Riedesel
FACILITY ACTIVITY: Large Transfer Station (>50,000 Cy Annually)
WASTE TYPE: Residential, Commercial, Recyclables
REGULATORY STATUS: Permit
PERMIT NO: 9066600019000030
ISSUE DATE: 01/03/95

36018001850 07T19	South Chautauqua T.s.	Not Reported NY COUNTY: Chautauqua

PHONE #: Not Reported
OPERATOR NAME: Not Reported
FACILITY ACTIVITY: Large Transfer Station (>50,000 Cy Annually)
WASTE TYPE: Residential, Recyclables
REGULATORY STATUS: Sapa
PERMIT NO: 9063800012000010
ISSUE DATE: 05/17/90

36018002030 07T21	Dunkirk T.s.	Not Reported NY COUNTY: Chautauqua

PHONE #: Not Reported
OPERATOR NAME: Bfi Of New York
FACILITY ACTIVITY: Large Transfer Station (>50,000 Cy Annually)
WASTE TYPE: C&d Debris
REGULATORY STATUS: Permit
PERMIT NO: 9063400003000010
ISSUE DATE: 05/16/96

36018002045 07T17	Westfield T.s.	Not Reported NY COUNTY: Chautauqua

PHONE #: Not Reported
OPERATOR NAME: Not Reported
FACILITY ACTIVITY: Large Transfer Station (>50,000 Cy Annually)
WASTE TYPE: Residential
REGULATORY STATUS: Permit
PERMIT NO: 906720004000040
ISSUE DATE: 08/01/96

ERIIS ENVIRONMENTAL DATA REPORT
NO FURTHER REMEDIAL ACTION PLANNED SITES
NFRAP - UNPLOTTABLE SITES

ERIIS Report #190681A Sep 9, 1997

ERIIS ID / EPA ID	FACILITY	ADDRESS
36039000307 NYD094176310	Dunkirk Lf	South Roberts Rd Dunkirk, NY 14048 COUNTY: Chautauqua

SITE EVENT(S)	COMPLETE DATE
Preliminary Assessment	09/30/86
Discovery	04/15/80
Screening Site Inspection	09/28/88

ERIIS ID / EPA ID	FACILITY	ADDRESS
36039000308 NYD987025160	Roblin Steel	320 South Road Dunkirk, NY 14048 COUNTY: Chautauqua

SITE EVENT(S)	COMPLETE DATE
Removal Action	05/05/94
Removal Investigation	05/27/93
Preliminary Assessment	02/09/95

ERIIS ID / EPA ID	FACILITY	ADDRESS
36039000309 NYD057982993	Special Metals Corp	Willowbrook Ave Dunkirk, NY 14048 COUNTY: Chautauqua

SITE EVENT(S)	COMPLETE DATE
Discovery	06/01/81
Preliminary Assessment	06/18/87

ERIIS ENVIRONMENTAL DATA REPORT
NEW YORK CHEMICAL BULK STORAGE TANKS
CBS - UNPLOTTABLE SITES

ERIIS Report #190681A Sep 9, 1997

ERIIS ID. / CBS NO.	FACILITY	ADDRESS
36047001315 9-000107	Cps (e. Lake Shore Dr. Fac.)	East Lake Shore Drive-rte.5 Dunkirk, NY 14048 COUNTY: Chautauqua

OPERATOR: Tim Dykas FACILITY PHONE: (716) 366-6010

STATUS: Inactive PBS NO: Not Reported CERTIFICATE DATE: 05/16/95
SPDES NO: Not Reported EXPIRATION DATE: 06/07/97

TYPE OF FACILITY: Manufacturing

TANK NO.: 00001
CAPACITY (GAL): 6500 % HAZ: 100
SUBSTANCE DESC: Single Hazardous Substance On Dec List
TANK STATUS: Closed - In Place
TANK LOCATION: Aboveground

TANK NO.: 00002
CAPACITY (GAL): 6500 % HAZ: 100
SUBSTANCE DESC: Single Hazardous Substance On Dec List
TANK STATUS: Closed - In Place
TANK LOCATION: Aboveground

ERIIS ENVIRONMENTAL DATA REPORT
NEW YORK PETROLEUM BULK STORAGE TANKS
PBS - UNPLOTTABLE SITES

ERIIS Report #190681A — Sep 9, 1997

ERIIS ID
PBS NO.
CBS NO. FACILITY ADDRESS

36048017797 School Number 7-garage
9-002968
Lake Shore Drive East (serval Street)
Dunkirk, NY 14048
COUNTY: Chautauqua

FACILITY TYPE: School
CONTACT: Dunkirk Public Schools (716) 366-6700
NO. OF TANKS: 0
TOTAL CAPACITY (GAL): 0
SITE STATUS: Inactive
CERTIFICATE DATE: 04/12/91
EXPIRATION DATE: 04/15/96

TANK ID: 1 INSTAL. DATE: 03/77 CAPACITY (GAL.): 2000
TANK STATUS: Closed - Removed TANK LOCATION: Underground
PRODUCT STORED: Leaded Gasoline
TANK TYPE: Steel/carbon Steel

36048018632 City Of Dunkirk-central Garage
9-037842
Lucas Avenue
Dunkirk, NY 14048
COUNTY: Chautauqua

FACILITY TYPE: Other
CONTACT: City Of Dunkirk Dpw (716) 366-3755
NO. OF TANKS: 2
TOTAL CAPACITY (GAL): 4000
SITE STATUS: Active
CERTIFICATE DATE: 03/26/96
EXPIRATION DATE: 06/18/97

TANK ID: 1 INSTAL. DATE: 08/77 CAPACITY (GAL.): 1000
TANK STATUS: Closed - Removed TANK LOCATION: Underground
PRODUCT STORED: Diesel
TANK TYPE: Steel/carbon Steel
TANK ID: 2 INSTAL. DATE: 09/81 CAPACITY (GAL.): 4000
TANK STATUS: Closed - Removed TANK LOCATION: Underground
PRODUCT STORED: Unleaded Gasoline
TANK TYPE: Steel/carbon Steel
TANK ID: 1 INSTAL. DATE: 10/92 CAPACITY (GAL.): 1000
TANK STATUS: Closed - Removed TANK LOCATION: Underground
PRODUCT STORED: Diesel
TANK TYPE: Steel/carbon Steel
TANK ID: 1 INSTAL. DATE: 11/94 CAPACITY (GAL.): 2000
TANK STATUS: In-service TANK LOCATION: Underground
PRODUCT STORED: Unleaded Gasoline
TANK TYPE: Steel/carbon Steel
TANK ID: 2 INSTAL. DATE: 11/94 CAPACITY (GAL.): 2000
TANK STATUS: In-service TANK LOCATION: Underground
PRODUCT STORED: Diesel
TANK TYPE: Steel/carbon Steel

36048018884 J & L Well Service Co
9-384275
Newell Rd
Dunkirk, NY 14048
COUNTY: Chautauqua

FACILITY TYPE: Other
CONTACT: J & L Well Service Co (716) 673-9116
NO. OF TANKS: 0
TOTAL CAPACITY (GAL): 0
SITE STATUS: Inactive
CERTIFICATE DATE: 05/21/92
EXPIRATION DATE: 07/20/97

TANK ID: 1 INSTAL. DATE: 10/81 CAPACITY (GAL.): 10000
TANK STATUS: Closed - In Place TANK LOCATION: Underground
PRODUCT STORED: Leaded Gasoline
TANK TYPE: Steel/carbon Steel

36048018935 Van Buren Pennzoil
9-384925
Rd 2 West Lake Rd
Dunkirk, NY 14048
COUNTY: Chautauqua

FACILITY TYPE: Retail Gasoline Sales
CONTACT: Robert T Boorady (716) 679-4376
NO. OF TANKS: 3
TOTAL CAPACITY (GAL): 12000
SITE STATUS: Active
CERTIFICATE DATE: 09/02/92
EXPIRATION DATE: 07/20/97

ERIIS ENVIRONMENTAL DATA REPORT
NEW YORK PETROLEUM BULK STORAGE TANKS
PBS - UNPLOTTABLE SITES

ERIIS Report #190681A Sep 9, 1997

IIS ID
BS NO.
CBS NO. FACILITY ADDRESS

TANK ID: 1 INSTAL. DATE: 05/81 CAPACITY (GAL.): 4000
TANK STATUS: Closed Before April 1, 1991 TANK LOCATION: Underground
PRODUCT STORED: Leaded Gasoline
TANK TYPE: Steel/carbon Steel
TANK ID: 2 INSTAL. DATE: 05/81 CAPACITY (GAL.): 4000
TANK STATUS: Closed Before April 1, 1991 TANK LOCATION: Underground
PRODUCT STORED: Unleaded Gasoline
TANK TYPE: Steel/carbon Steel
TANK ID: 3 INSTAL. DATE: 05/81 CAPACITY (GAL.): 4000
TANK STATUS: Closed Before April 1, 1991 TANK LOCATION: Underground
PRODUCT STORED: Unleaded Gasoline
TANK TYPE: Steel/carbon Steel
TANK ID: 4 INSTAL. DATE: 04/90 CAPACITY (GAL.): 4000
TANK STATUS: In-service TANK LOCATION: Underground
PRODUCT STORED: Unleaded Gasoline
TANK TYPE: Steel/carbon Steel
TANK ID: 5 INSTAL. DATE: 04/90 CAPACITY (GAL.): 4000
TANK STATUS: In-service TANK LOCATION: Underground
PRODUCT STORED: Unleaded Gasoline
TANK TYPE: Steel/carbon Steel
TANK ID: 6 INSTAL. DATE: 04/90 CAPACITY (GAL.): 4000
TANK STATUS: In-service TANK LOCATION: Underground
PRODUCT STORED: Unleaded Gasoline
TANK TYPE: Steel/carbon Steel

36048019141 Genesee Leroy Stone Corp Middle Rd
9-223204 Dunkirk, NY 14048
COUNTY: Chautauqua

FACILITY TYPE: Other
CONTACT: G.a. Dewitt (716) 366-4996 SITE STATUS: Inactive
NO. OF TANKS: 0 CERTIFICATE DATE: 08/17/87
TOTAL CAPACITY (GAL): 0 EXPIRATION DATE: 08/17/92

TANK ID: 1 INSTAL. DATE: 07/72 CAPACITY (GAL.): 15000
TANK STATUS: Closed - Removed TANK LOCATION: Aboveground
PRODUCT STORED: Nos. 1, 2 Or 4 Fuel Oil
TANK TYPE: Steel/carbon Steel
TANK ID: 2 INSTAL. DATE: 07/75 CAPACITY (GAL.): 900
TANK STATUS: Closed - Removed TANK LOCATION: Aboveground
PRODUCT STORED: Nos. 1, 2 Or 4 Fuel Oil
TANK TYPE: Steel/carbon Steel

36048019305 Dunkirk Aviation Sales & Serv Inc. Municipal Airport Middle Rd
9-382329 Dunkirk, NY 14048
COUNTY: Chautauqua

FACILITY TYPE: Retail Gasoline Sales; Other Retail Sales
CONTACT: Dunkirk Avia Sales & Serv Inc (716) 366-6938 SITE STATUS: Active
NO. OF TANKS: 4 CERTIFICATE DATE: 03/17/94
TOTAL CAPACITY (GAL): 32000 EXPIRATION DATE: 08/17/97

TANK ID: 1 INSTAL. DATE: 00/00 CAPACITY (GAL.): 6000
TANK STATUS: In-service TANK LOCATION: Underground
PRODUCT STORED: Leaded Gasoline
TANK TYPE: Fiberglass Reinforced Plastic
TANK ID: 2 INSTAL. DATE: 00/00 CAPACITY (GAL.): 3000
TANK STATUS: Closed - Removed TANK LOCATION: Underground
PRODUCT STORED: Leaded Gasoline
TANK TYPE: Steel/carbon Steel
TANK ID: 3 INSTAL. DATE: 00/00 CAPACITY (GAL.): 4000
TANK STATUS: Closed - Removed TANK LOCATION: Underground
PRODUCT STORED: Leaded Gasoline
TANK TYPE: Steel/carbon Steel
TANK ID: 4 INSTAL. DATE: 00/00 CAPACITY (GAL.): 4000
TANK STATUS: Closed - Removed TANK LOCATION: Underground
PRODUCT STORED: Leaded Gasoline
TANK TYPE: Steel/carbon Steel

ERIIS ID
PBS NO.
CBS NO. FACILITY ADDRESS

TANK ID: 5 INSTAL. DATE: 06/82 CAPACITY (GAL.): 10000
TANK STATUS: In-service TANK LOCATION: Underground
PRODUCT STORED: Kerosene
TANK TYPE: Steel/carbon Steel
TANK ID: 6 INSTAL. DATE: 06/82 CAPACITY (GAL.): 10000
TANK STATUS: In-service TANK LOCATION: Underground
PRODUCT STORED: Kerosene
TANK TYPE: Steel/carbon Steel
TANK ID: 2 INSTAL. DATE: 07/92 CAPACITY (GAL.): 6000
TANK STATUS: In-service TANK LOCATION: Underground
PRODUCT STORED: Leaded Gasoline
TANK TYPE: Fiberglass Reinforced Plastic

36048019884 Dunkirk Sewage Treatment Plant Wright Park Dr
9-414190 Dunkirk, NY 14048
COUNTY: Chautauqua

FACILITY TYPE: Utility
CONTACT: City Of Dunkirk (716) 366-3611 SITE STATUS: Inactive
NO. OF TANKS: 0 CERTIFICATE DATE: 10/06/87
TOTAL CAPACITY (GAL): 0 EXPIRATION DATE: 10/06/92

TANK ID: 001 INSTAL. DATE: 05/75 CAPACITY (GAL.): 9600
TANK STATUS: Closed Before April 1, 1991 TANK LOCATION: Underground
PRODUCT STORED: Nos. 1, 2 Or 4 Fuel Oil
TANK TYPE: Steel/carbon Steel

36048020297 H. Olsen & Sons Contractors,in Middle Rd
9-444030 Dunkirk, NY 14048
COUNTY: Chautauqua

FACILITY TYPE: Trucking/transportation
CONTACT: Glenn Olsen (716) 965-4866 SITE STATUS: Inactive
NO. OF TANKS: 0 CERTIFICATE DATE: 03/22/93
TOTAL CAPACITY (GAL): 0 EXPIRATION DATE: 06/28/98

TANK ID: 1 INSTAL. DATE: 06/80 CAPACITY (GAL.): 10000
TANK STATUS: Closed - Removed TANK LOCATION: Underground
PRODUCT STORED: Leaded Gasoline
TANK TYPE: Steel/carbon Steel
TANK ID: 2 INSTAL. DATE: 06/91 CAPACITY (GAL.): 2000
TANK STATUS: Closed - Removed TANK LOCATION: Aboveground
PRODUCT STORED: Diesel
TANK TYPE: Steel/carbon Steel

36048020350 A. Sam & Sons Produce Co.,inc. West Lake Road
9-446874 Dunkirk, NY 14048
COUNTY: Chautauqua

FACILITY TYPE: Trucking/transportation
CONTACT: Randall Sam (716) 366-6666 SITE STATUS: Active
NO. OF TANKS: 2 CERTIFICATE DATE: 04/21/93
TOTAL CAPACITY (GAL): 16000 EXPIRATION DATE: 07/28/98

TANK ID: 1 INSTAL. DATE: 08/86 CAPACITY (GAL.): 6000
TANK STATUS: In-service TANK LOCATION: Underground
PRODUCT STORED: Leaded Gasoline
TANK TYPE: Fiberglass Reinforced Plastic
TANK ID: 2 INSTAL. DATE: 10/69 CAPACITY (GAL.): 10000
TANK STATUS: In-service TANK LOCATION: Aboveground
PRODUCT STORED: Diesel
TANK TYPE: Steel/carbon Steel
TANK ID: 3 INSTAL. DATE: 07/86 CAPACITY (GAL.): 1000
TANK STATUS: Closed - Removed TANK LOCATION: Aboveground
PRODUCT STORED: Other
TANK TYPE: Steel/carbon Steel

ERIIS ID
PBS NO.
CBS NO. FACILITY ADDRESS

TANK ID: 4 INSTAL. DATE: 08/86 CAPACITY (GAL.): 2800
TANK STATUS: Closed - Removed TANK LOCATION: Aboveground
PRODUCT STORED: Other
TANK TYPE: Steel/carbon Steel

36048020493 Dunkirk Yellow Goose 253-255 Lakeshore Road
9-487546 Dunkirk, NY 14048
COUNTY: Chautauqua

FACILITY TYPE: Retail Gasoline Sales
CONTACT: Mws Enterprises (716) 366-7230 SITE STATUS: Active
NO. OF TANKS: 5 CERTIFICATE DATE: 11/14/95
TOTAL CAPACITY (GAL): 22000 EXPIRATION DATE: 06/23/99

TANK ID: 1 INSTAL. DATE: 00/00 CAPACITY (GAL.): 4000
TANK STATUS: In-service TANK LOCATION: Underground
PRODUCT STORED: Unleaded Gasoline
TANK TYPE: Steel/carbon Steel
TANK ID: 2 INSTAL. DATE: 00/00 CAPACITY (GAL.): 4000
TANK STATUS: In-service TANK LOCATION: Underground
PRODUCT STORED: Unleaded Gasoline
TANK TYPE: Steel/carbon Steel
TANK ID: 3 INSTAL. DATE: 00/00 CAPACITY (GAL.): 4000
TANK STATUS: In-service TANK LOCATION: Underground
PRODUCT STORED: Unleaded Gasoline
TANK TYPE: Steel/carbon Steel
TANK ID: 4 INSTAL. DATE: 00/00 CAPACITY (GAL.): 4000
TANK STATUS: In-service TANK LOCATION: Underground
PRODUCT STORED: Unleaded Gasoline
TANK TYPE: Steel/carbon Steel
TANK ID: 5 INSTAL. DATE: 06/91 CAPACITY (GAL.): 6000
TANK STATUS: In-service TANK LOCATION: Underground
PRODUCT STORED: Unleaded Gasoline
TANK TYPE: Fiberglass Coated Steel

36048020687 Genesee Leroy Stone Corp Plt31 Bennett Rd
9-502758 Dunkirk, NY 14048
COUNTY: Chautauqua

FACILITY TYPE: Manufacturing
CONTACT: Genesee Leroy Stone Corp (716) 366-4996 SITE STATUS: Active
NO. OF TANKS: 2 CERTIFICATE DATE: 03/06/95
TOTAL CAPACITY (GAL): 15500 EXPIRATION DATE: 05/11/00

TANK ID: 312 INSTAL. DATE: 01/89 CAPACITY (GAL.): 15000
TANK STATUS: In-service TANK LOCATION: Aboveground
PRODUCT STORED: Nos. 1, 2 Or 4 Fuel Oil
TANK TYPE: Steel/carbon Steel
TANK ID: 313 INSTAL. DATE: 01/89 CAPACITY (GAL.): 500
TANK STATUS: In-service TANK LOCATION: Aboveground
PRODUCT STORED: Diesel
TANK TYPE: Steel/carbon Steel

36048020780 D & F Plaza Wine Shop Bennett Road
9-516449 Dunkirk, NY 14048
COUNTY: Chautauqua

FACILITY TYPE: Retail Gasoline Sales
CONTACT: D & F Plaza Wing Shop (716) 842-1500 SITE STATUS: Inactive
NO. OF TANKS: 0 CERTIFICATE DATE: 02/08/91
TOTAL CAPACITY (GAL): 0 EXPIRATION DATE: 02/07/96

TANK ID: 1 INSTAL. DATE: 00/00 CAPACITY (GAL.): 10000
TANK STATUS: Closed - Removed TANK LOCATION: Underground
PRODUCT STORED: Leaded Gasoline
TANK TYPE: Steel/carbon Steel

ERIS ID
PBS NO.
CBS NO. FACILITY ADDRESS

TANK ID: 2 INSTAL. DATE: 00/00 CAPACITY (GAL.): 10000
TANK STATUS: Closed - Removed TANK LOCATION: Underground
PRODUCT STORED: Leaded Gasoline
TANK TYPE: Steel/carbon Steel
TANK ID: 3 INSTAL. DATE: 00/00 CAPACITY (GAL.): 10000
TANK STATUS: Closed - Removed TANK LOCATION: Underground
PRODUCT STORED: Leaded Gasoline
TANK TYPE: Steel/carbon Steel
TANK ID: 4 INSTAL. DATE: 00/00 CAPACITY (GAL.): 10000
TANK STATUS: Closed - Removed TANK LOCATION: Underground
PRODUCT STORED: Leaded Gasoline
TANK TYPE: Steel/carbon Steel
TANK ID: 5 INSTAL. DATE: 00/00 CAPACITY (GAL.): 1200
TANK STATUS: Closed - Removed TANK LOCATION: Underground
PRODUCT STORED: Other
TANK TYPE: Steel/carbon Steel
TANK ID: 6 INSTAL. DATE: 00/00 CAPACITY (GAL.): 1200
TANK STATUS: Closed - Removed TANK LOCATION: Underground
PRODUCT STORED: Diesel
TANK TYPE: Steel/carbon Steel

36048047494 Great Circle Aviation Middle Road
9-600167 Dunkirk, NY 14048
COUNTY: Chautauqua

FACILITY TYPE: Airline(air Taxi)
CONTACT: Great Circle Aviation (716) 366-1409 SITE STATUS: Active
NO. OF TANKS: 2 CERTIFICATE DATE: 08/12/94
TOTAL CAPACITY (GAL): 12000 EXPIRATION DATE: 08/09/99

TANK ID: 1 INSTAL. DATE: 12/93 CAPACITY (GAL.): 10000
TANK STATUS: In-service TANK LOCATION: Aboveground
PRODUCT STORED: Kerosene
TANK TYPE: Steel/carbon Steel
TANK ID: 2 INSTAL. DATE: 12/93 CAPACITY (GAL.): 2000
TANK STATUS: In-service TANK LOCATION: Aboveground
PRODUCT STORED: Leaded Gasoline
TANK TYPE: Steel/carbon Steel

ERIIS LIST OF STREETS IN THE RADIUS

ERIIS Report #190681A Sep 9, 1997

STREET NAME
E 2ND ST
W 2ND ST
E 3RD ST
W 3RD ST
E 4TH ST
W 4TH ST
E 5TH ST
W 5TH ST
E 6TH ST
E 7TH ST
E 9TH ST
ANTELOPE ST
ARMADILLO ST
N BEAGLE ST
S BEAGLE ST
N BEAVER ST
S BEAVER ST
BENNETT ROAD
E BENTON ST
W BENTON ST
BOOKSTAVER AVE
BUCKNOR ST
E CEDAR ST
CENTRAL AVE
E CHESTNUT ST
COLUMBUS AVE
E COURTNEY ST
W COURTNEY ST
DEER ST
E DOUGHTY ST
W DOUGHTY ST
N ERMINE ST
S ERMINE ST
FIZELL ST
FRANKLIN AVE
E FRONT ST
N GAZELLE ST
S GAZELLE ST
GENET ST
GRANT AVE
GREENHURST AVE
HOME PL
HOYT ST
ICE CREAM DR
IRVING PL
N JERBOA ST
S JERBOA ST
KING ST
KOSCIUSZKO AVE
LAKE SHORE DR E
LAKESIDE BLVD
LAMPHERE ST
LEMING ST
LEOPARD ST
LIBERTY ST
LINCOLN AVE
LORD ST
LYNX ST
MAIN ST
N MAIN ST
MAPLE AVE
S MARGAY ST
MARKET ST
N MARTIN ST
S MARTIN ST
MCDONOUGH ST
MIDDLE ROAD
MOFFAT ST
MONROE ST
NEVINS ST
NEW ROAD
N OCELOT ST
S OCELOT ST
ORCHARD ST

ERIIS LIST OF STREETS IN THE RADIUS

ERIIS Report #190681A Sep 9, 1997

STREET NAME
OTTER ST
OUNCE ST
N PANGOLIN ST
S PANGOLIN ST
PARK AVE
N PARK AVE
E PINE ST
PROGRESS DR
RABBIT ST
N ROBERTS ROAD
S ROBERTS ROAD
RUGGLES ST
SAINT HEDWIG AVE
N SERVAL ST
S SERVAL ST
SISSON ST
SOBIESKI AVE
STANISLAUS AVE
STEGELSKE AVE
E TALCOTT ST
W TALCOTT ST
E TENNEY ST
W TENNEY ST
TOWNSEND ST
TRAIN ST
URBAN ROAD
N WARSAW ST
S WARSAW ST
WASHINGTON AVE
WEBSTER ST
WHITE AVE
WRIGHT ST
WRIGHT PARK DR
N ZEBRA ST
S ZEBRA ST
ZORTILLA ST

SEARCH RESULTS
ERIIS HISTORICAL MAP COLLECTION

PERTAINING TO: Roblin
Roberts Road
Dunkirk, NY 14048

REPORT NUMBER: 190681A

Preliminary research of the ERIIS Historic Map Collection indicates that historic map coverage may be available for this site. If more detailed research shows that coverage is not, in fact, available, you will be sent a version of this page indicating "No Coverage Available". If historic maps are found, you will receive them according to the terms of of your ERIIS service and delivery agreement.

The ERIIS Historic Map Collection is the largest and most extensive private collection of prior-use maps in the United States, thereby affording the greatest degree of historic due diligence. ERIIS' inventory includes images from the following publishers:

- Bromley
- Dakin
- Hexamer
- Hopkins
- Manufacturers Mutual Fire Insurance Maps
- Nirenstein Real Estate Atlases
- Sanborn Fire Insurance Map Collections
- Scarlett and Scarlett
- Rascher
- William G. Baist

Note: Electronic delivery may not be available for some historic maps. If you requested electronic delivery of maps for a site where this service is not available, paper copies of all maps for your subject property will be sent via overnight carrier to arrive within your delivery time at no additional charge.

APPENDIX F

Photo #1: Edgewood Warehouse building looking northeastward from the intersection of South Roberts Road and Talcott Street.

Photo #2: Western side of warehouse building extending along South Roberts Road.

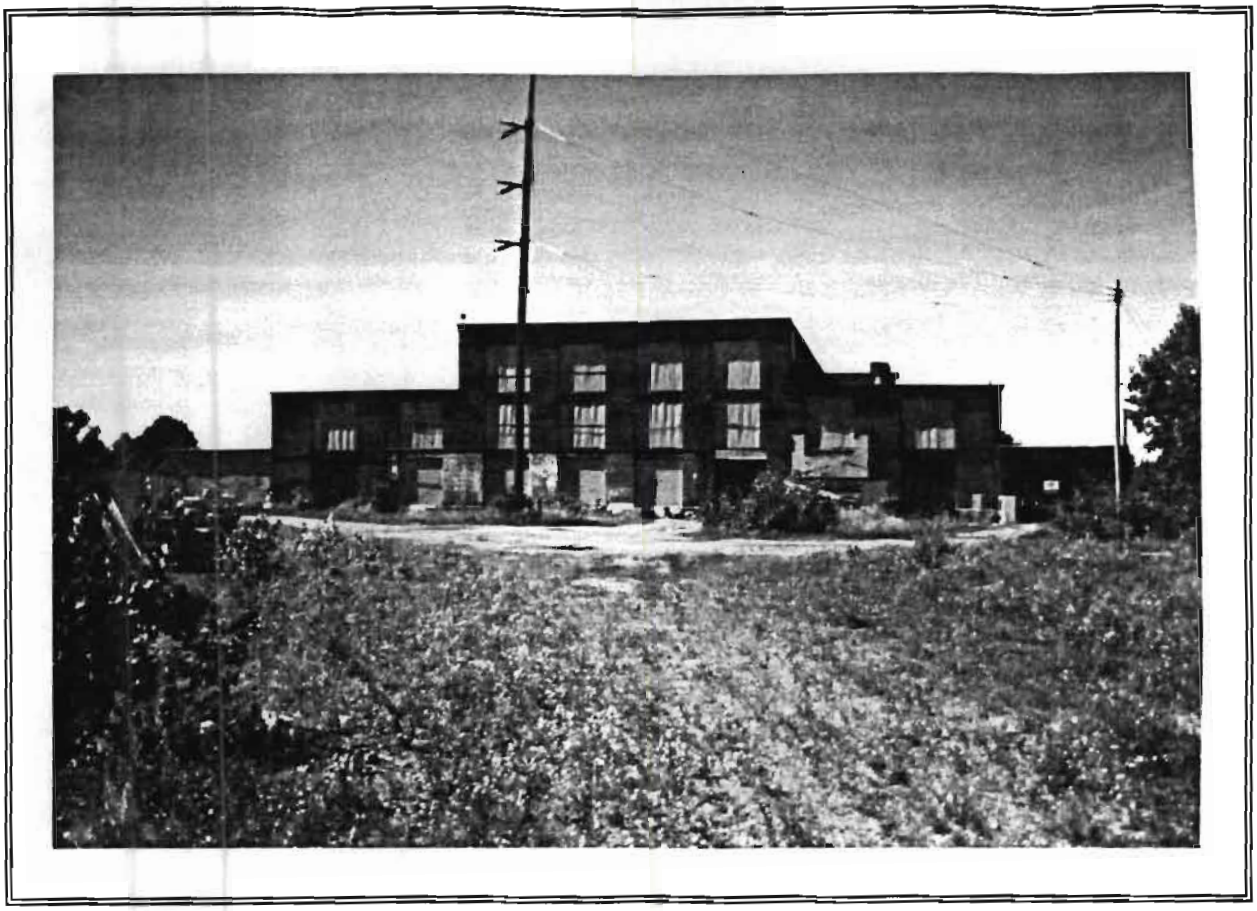

Photo #3: East side of warehouse building.

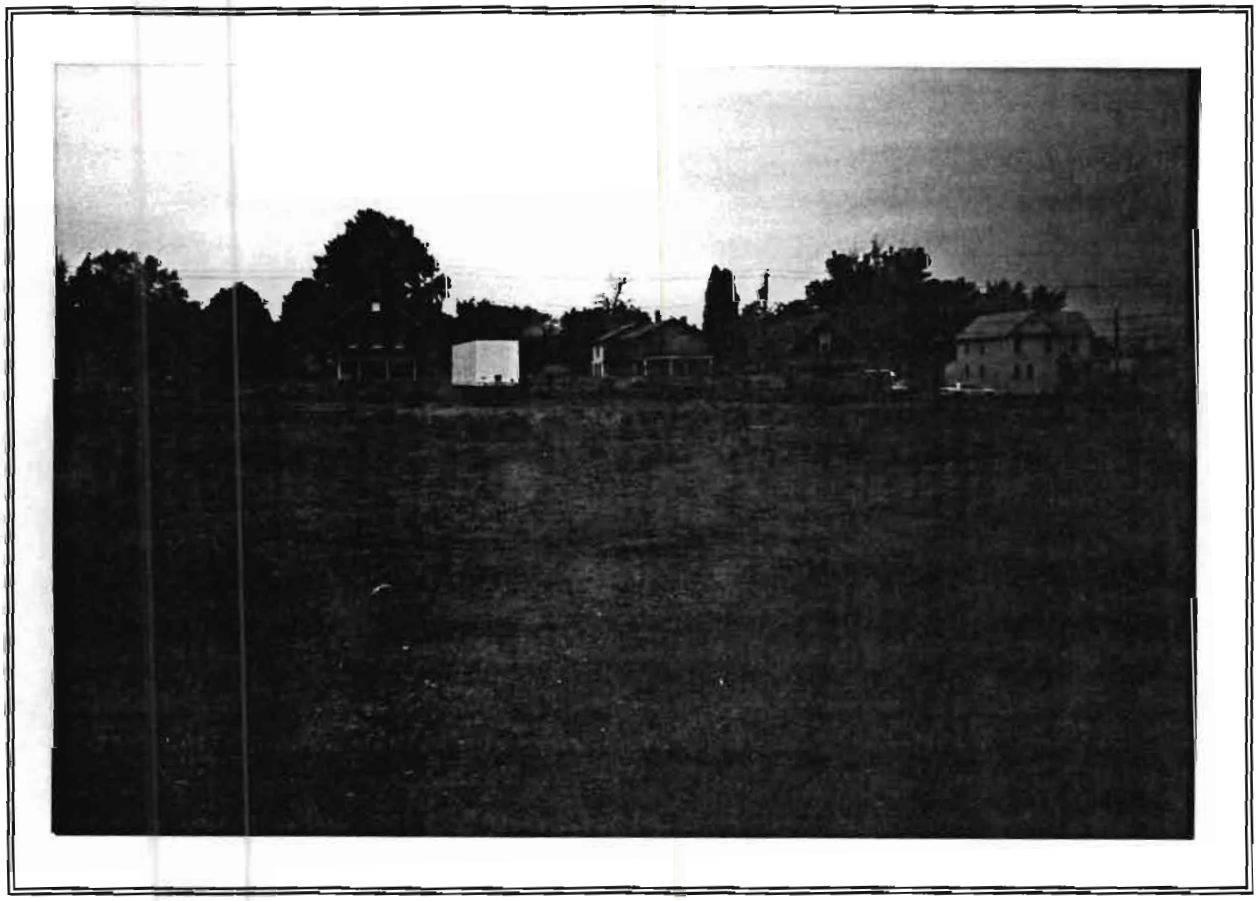

Photo #4: Southwestern portion of subject property looking towards South Roberts Road.

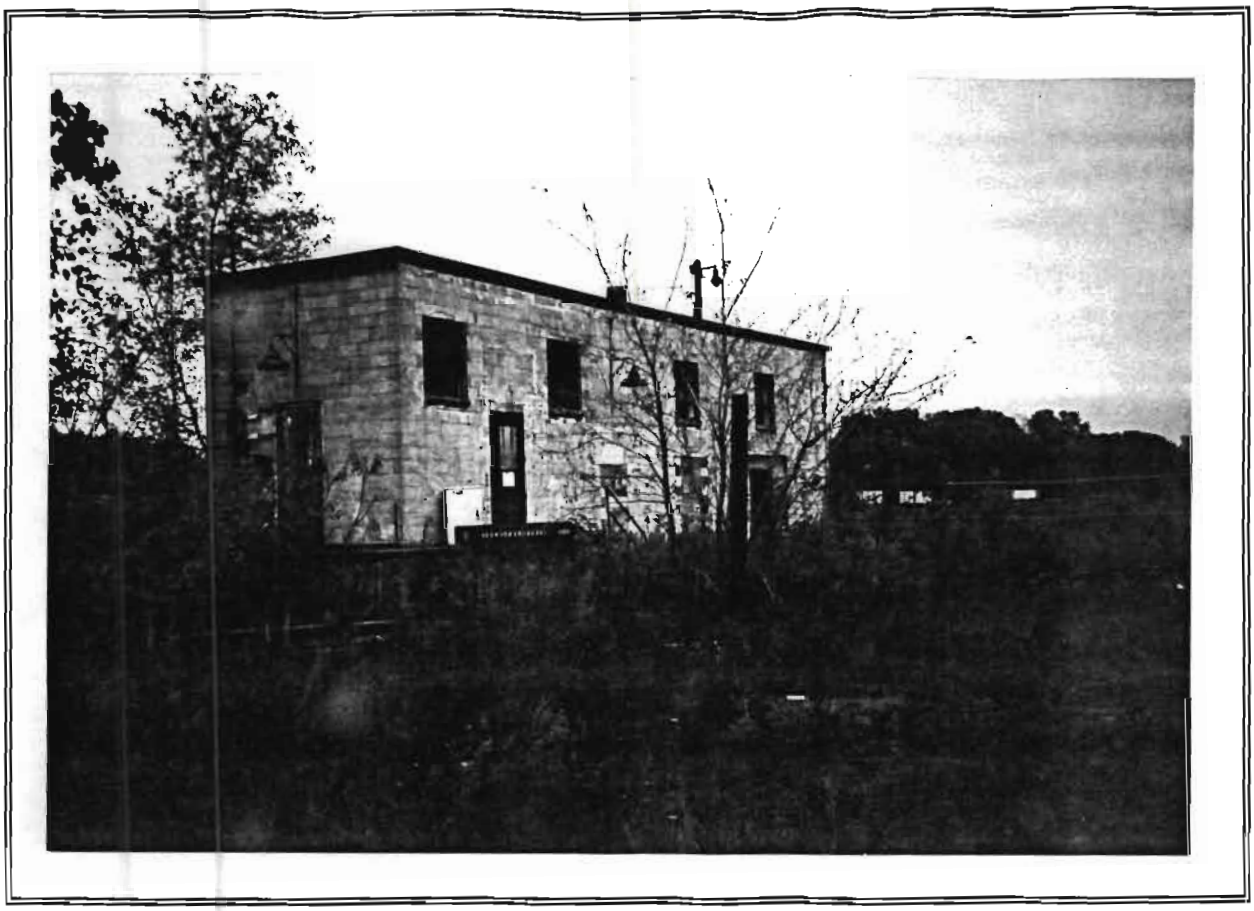

Photo #5: Former scale house building located on northeastern corner of subject property.

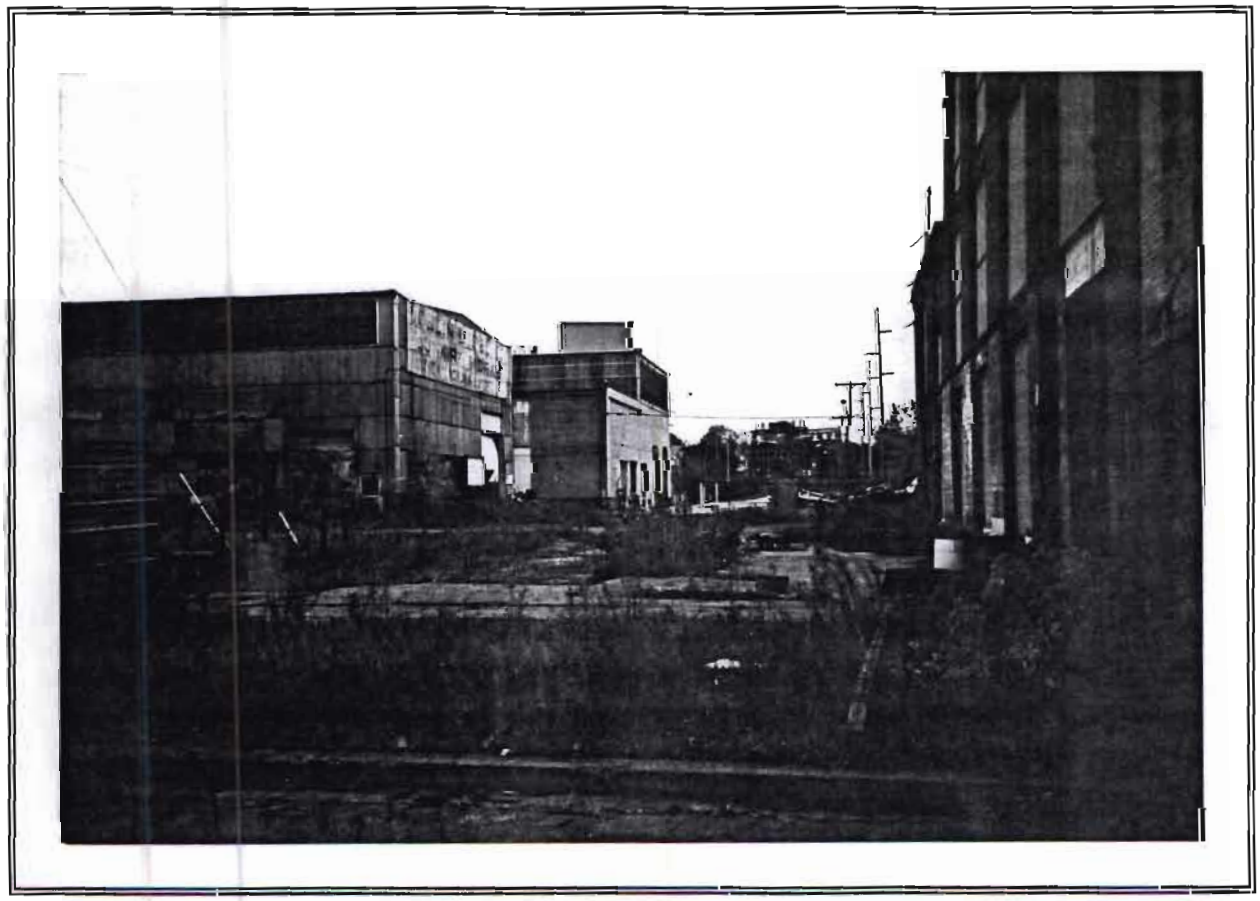

Photo #6: Neighboring properties to the south and southeast, including former Roblin Steel plant (midground) and dormant Alumax Extrusions, Inc. facility (background).

Photo #7: Equipment, packaging and operating supplies stored within warehouse.

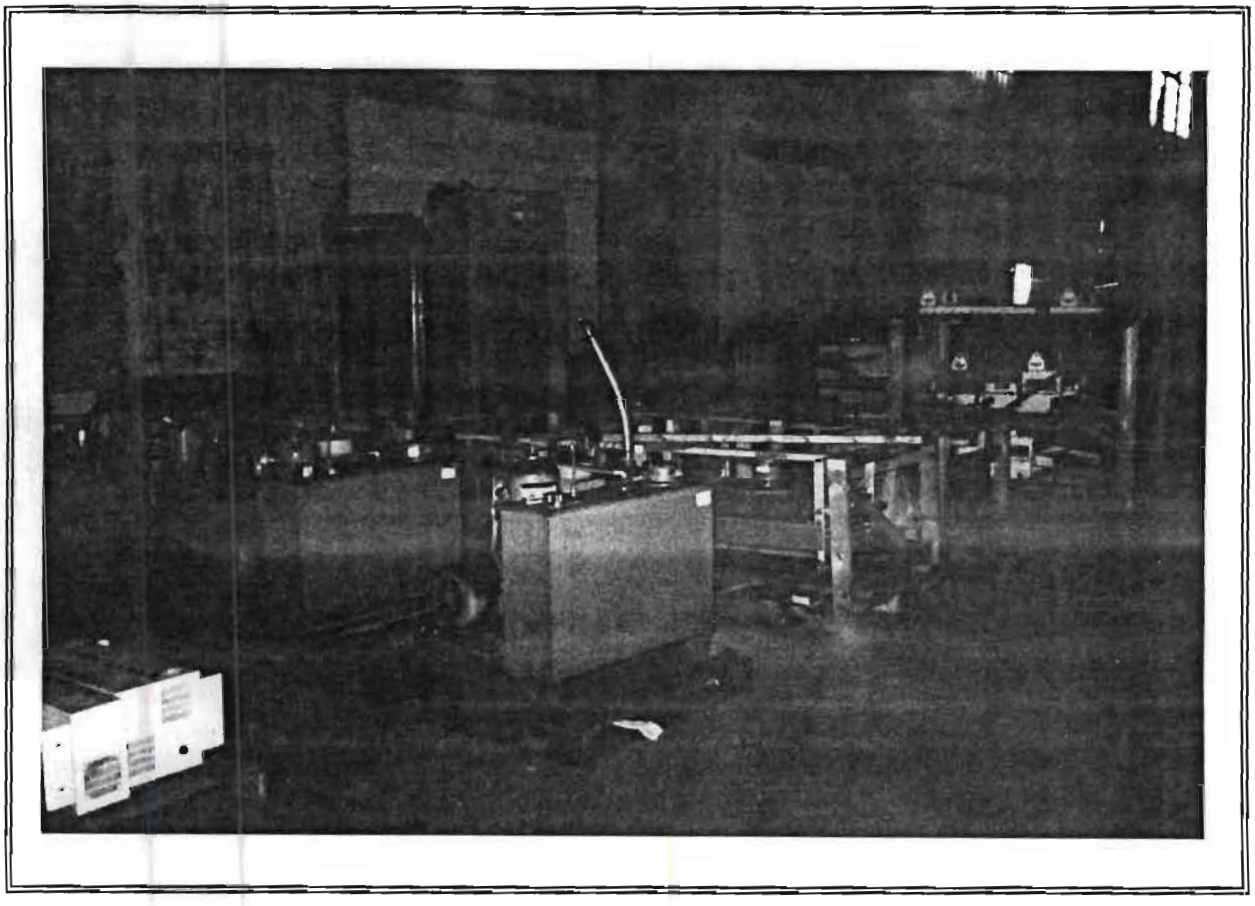

Photo #8: Equipment stored within warehouse.

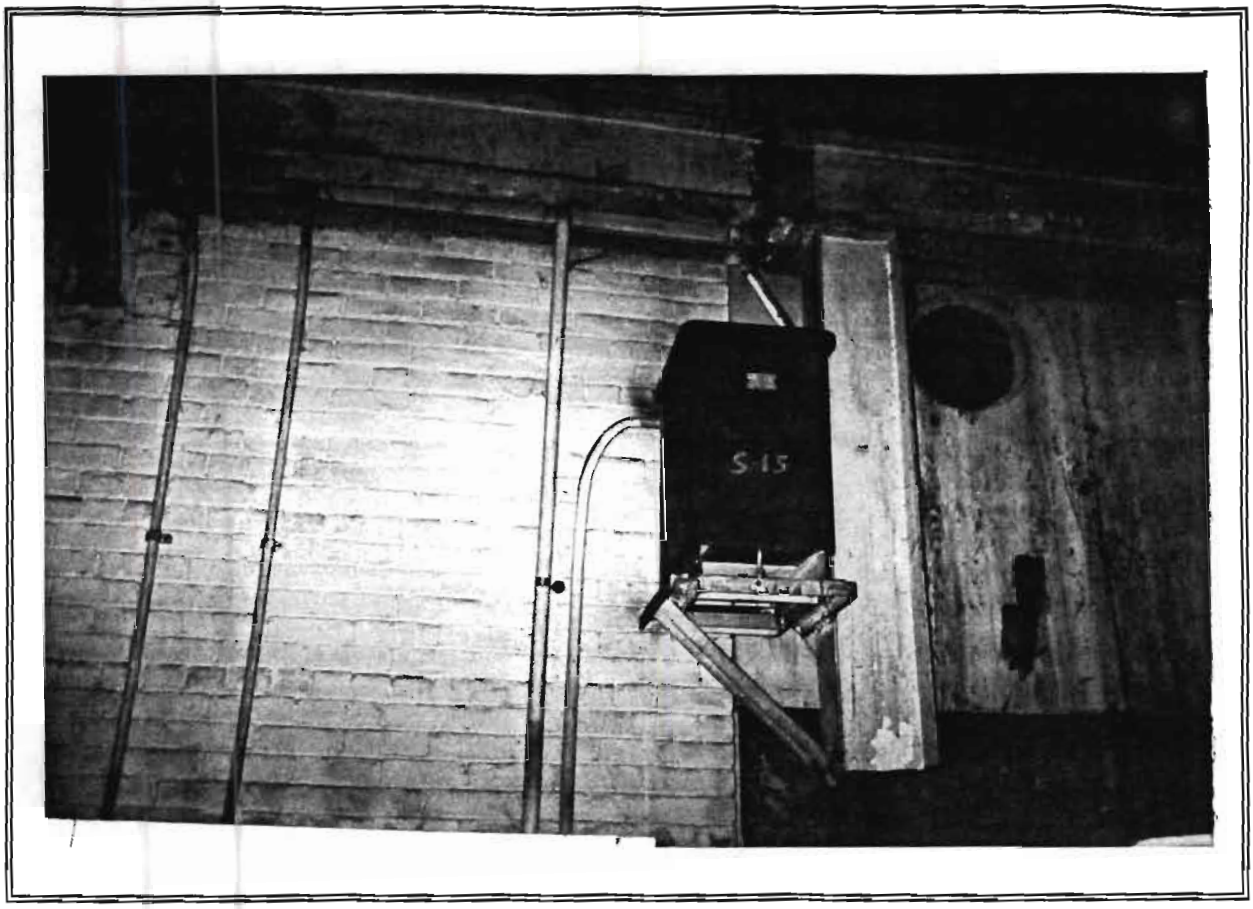

Photo #9: Column-mounted 25 KVA transformer located within warehouse building.

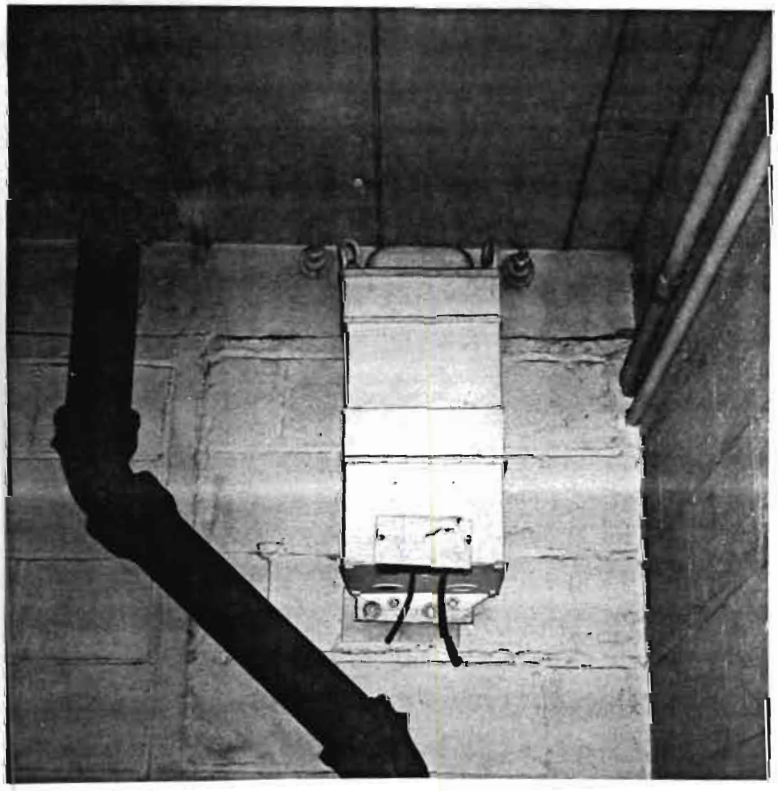

Photo #10: Wall mounted transformer located in former scale house building.

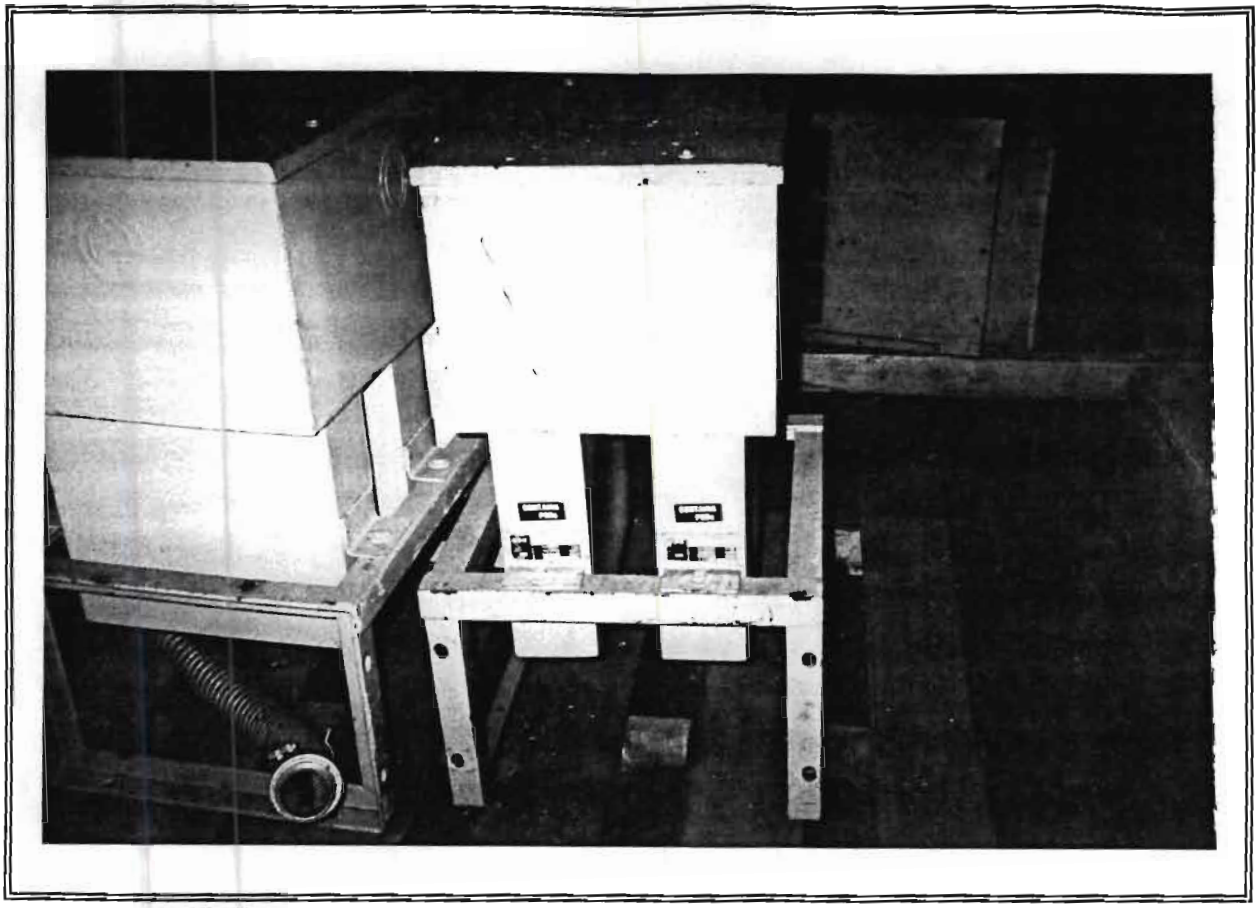

Photo #11: Pallet holding two capacitor assemblies labeled as PCB-containing stored within warehouse.

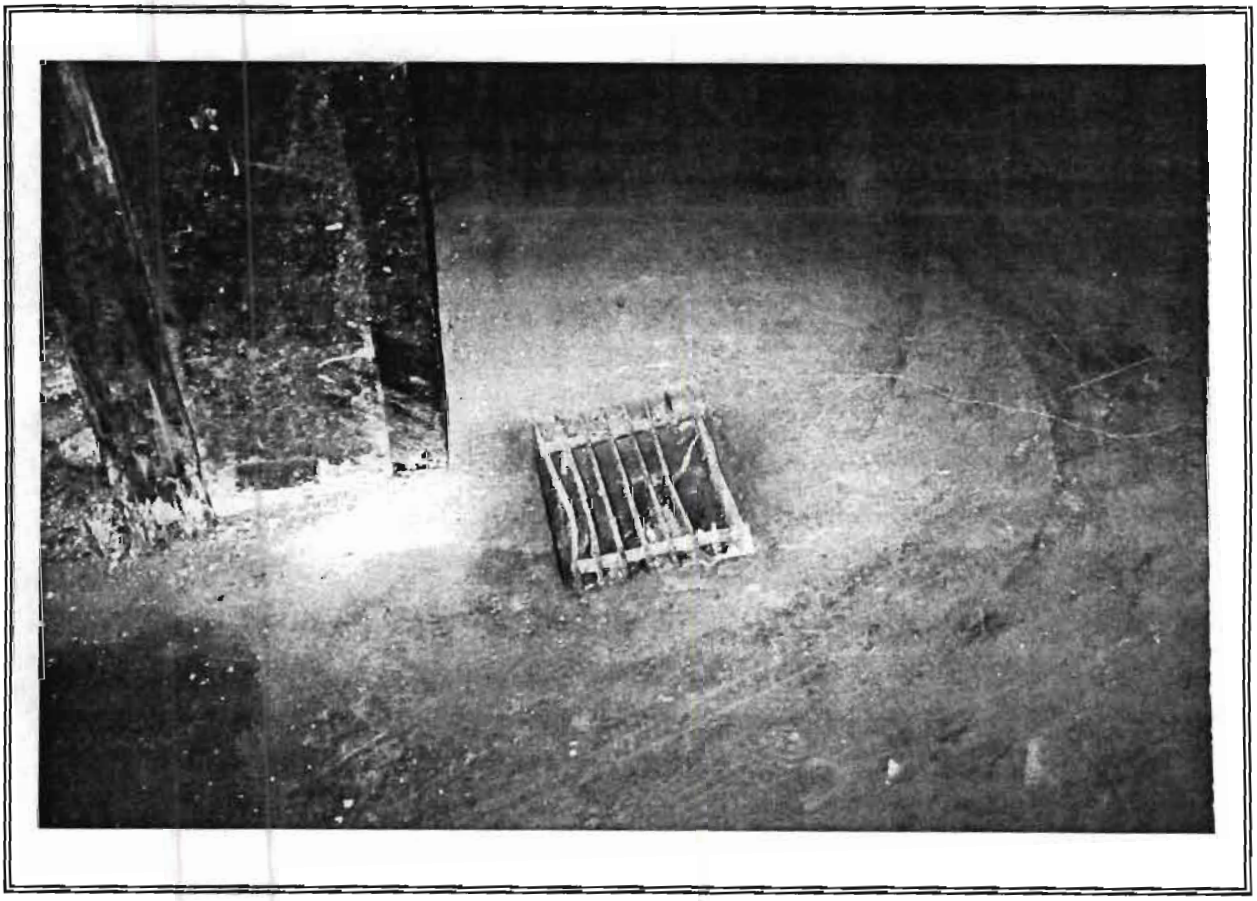

Photo #12: Floor drain located within former maintenance room of warehouse building.

Photo #13: Area of stained soil located along northern property margin between warehouse and scale house.

Photo #14: Discarded container observed near former scale house building (labeled as originally containing hazardous substance).

Photo #15: One of three uncovered 55-gallon drums containing a solid substance resembling ash observed on the east side of the warehouse building.

Photo #16: 5-gallon pails containing roofing-tar residues observed along northern side of warehouse building .

Photo #17: Former pit filled with soil/fill on the east side of warehouse building in the vicinity of the former pickling house.

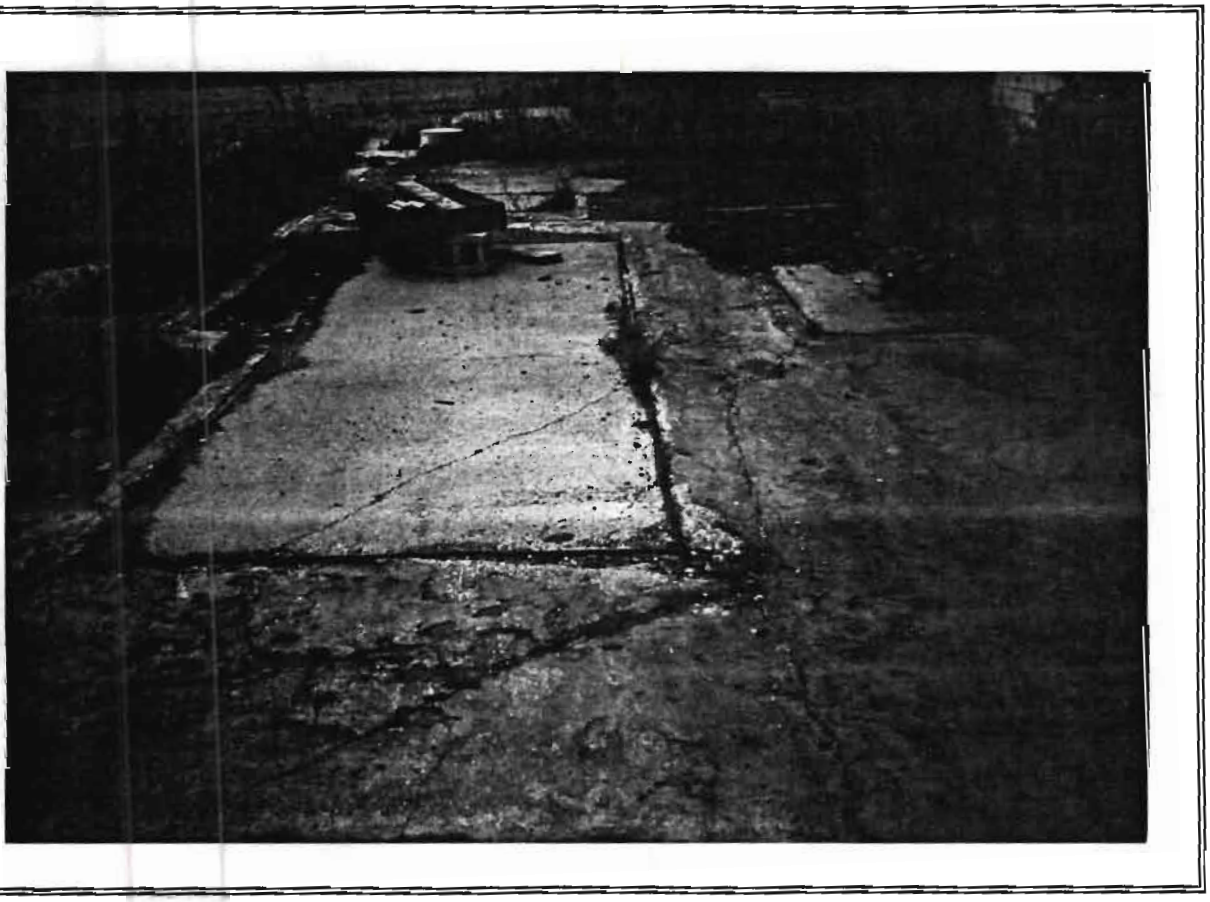

Photo #18: Former pits filled with concrete located near east end of warehouse building in vicinity of former lime storage room.

Photo #19: Potential former transformer pad located near southeastern corner of warehouse.

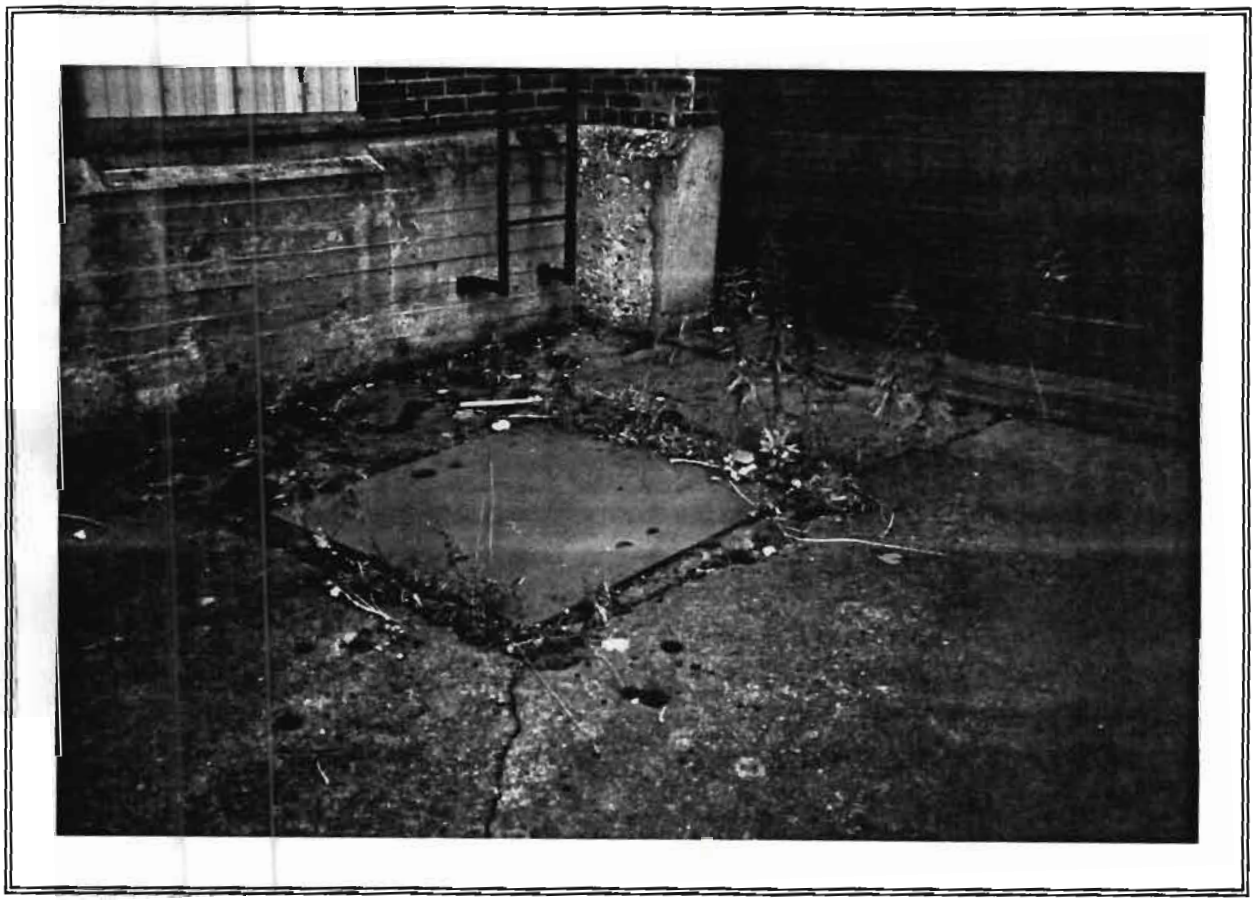

Photo #20: Covered pit located along northern side of warehouse building.

Photo #21: Pipes protruding from base of northern wall of the warehouse building.

Photo #22: Pile of demolition debris potentially containing ACMs located near former scale house building.

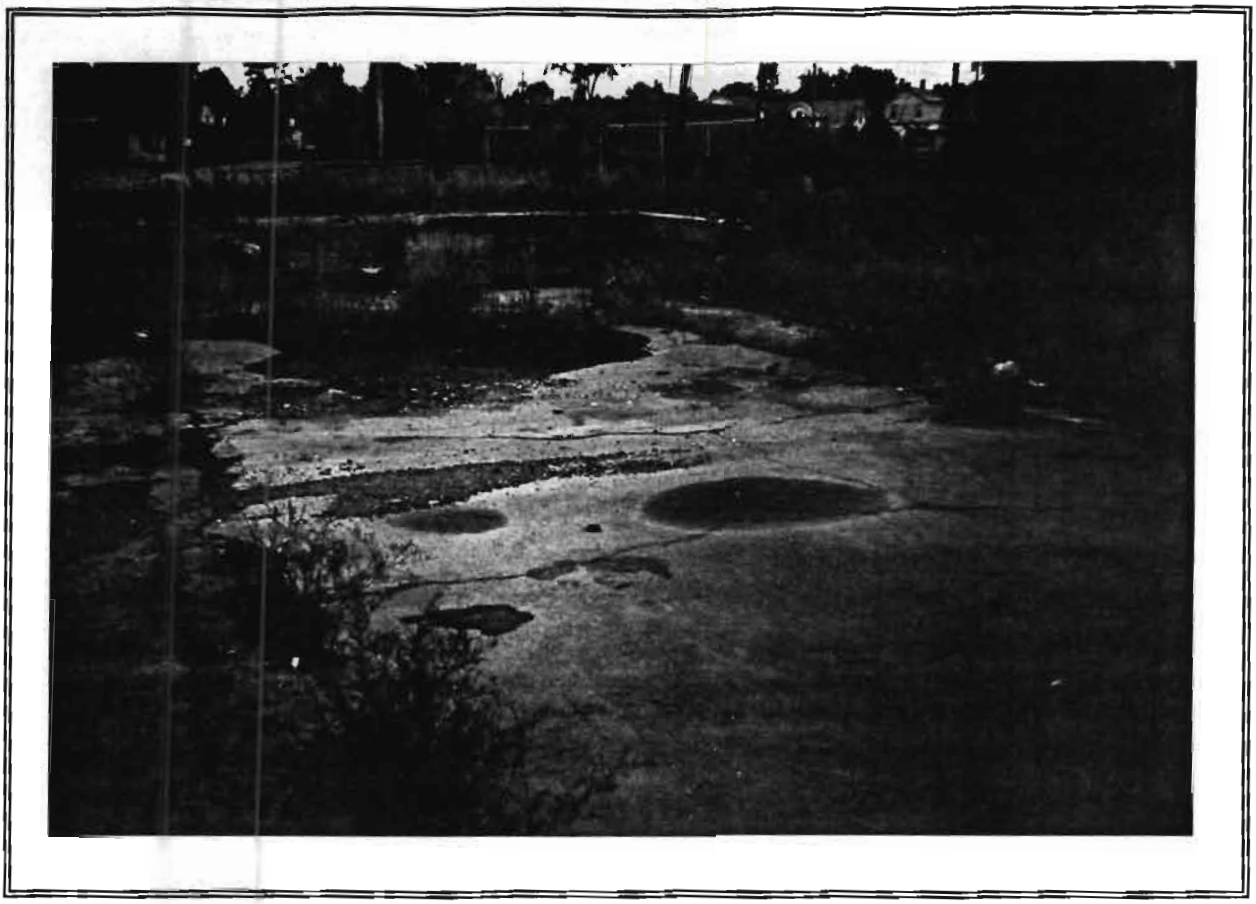

Photo #23: Former pit filled with concrete located along south side of warehouse building in the vicinity of the former neutralizing room (potential stained surface shown in background).

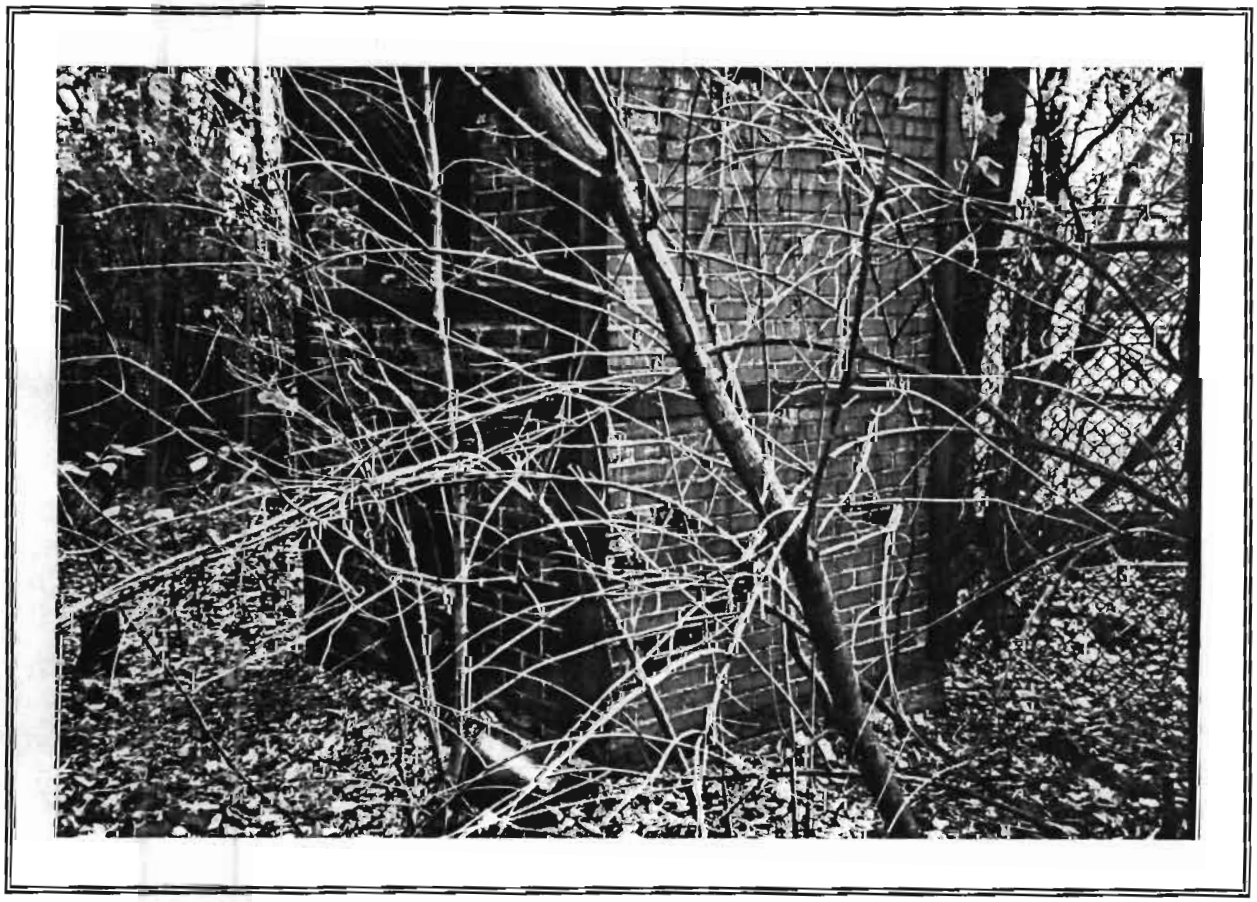

Photo #24: Brick incinerator located north of the warehouse building.

Photo #25: Trench drain filled with sediment observed in fenced yard located along south side of warehouse building.

Photo #26: Demolition debris located on former Roblin Steel site just east of the subject property's eastern boundary (note groundwater monitoring well in foreground).

PHASE II ENVIRONMENTAL SITE ASSESSMENT REPORT

FOR THE

EDGEWOOD WAREHOUSE SITE
320 SOUTH ROBERTS ROAD
DUNKIRK, NEW YORK
(CHA PROJECT NO. 8279)

MAY 7, 1999

Prepared for:

CLIFFSTAR CORPORATION
One Cliffstar Avenue
Dunkirk, New York 14048

Prepared by:

CLOUGH, HARBOUR & ASSOCIATES LLP
ENGINEERS, SURVEYORS, PLANNERS & LANDSCAPE ARCHITECTS
295 Main Street
Suite 900
Buffalo, New York 14202

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project. Therefore, no comparison of the inorganic results with background data is provided, and the evaluation of these results focuses on water quality trends across the site and comparisons with applicable regulatory standards.

With the exception of the samples from MW-5 and MW-6, the concentrations of the inorganic parameters analyzed are relatively uniform across the site and are generally below the groundwater standards. Some exceptions to this include iron and manganese, which were detected at concentrations that exceed the groundwater standards in each of the eight (8) wells. The concentrations of numerous metals detected in MW-5 and MW-6, however, are markedly higher than the average concentrations of these parameters in the six (6) remaining wells, and exceed the applicable groundwater standards. Examples of this include the aluminum, arsenic, berylium, iron, nickel, potassium, and zinc.

Analytical results from the trip blanks indicate that no VOCs were detected in either of these QA/QC samples. Therefore, there were no indications that any cross contamination due to sample handling, storage or shipping procedures occurred during the course of the project. A comparison of the results from the sample collected from MW-5 with those from the blind field duplicate sample, which was also collected from MW-5, revealed that the data generally coincide. As such, the reproducibility of the laboratory results does not appear to be in question.

inorganic parameters is attributed to the historic industrial use of the subject property and adjacent properties, and the presence of fill containing slag and foundry sand across the site.

As previously noted, the presence of PAHs in the subsurface soil at the levels detected is not anticipated to represent a significant threat to groundwater beneath the site, due to the chemical characteristics of these compounds. Areas of elevated metals concentrations, however, could adversely affect groundwater quality. As discussed in Section 6.3, however, widespread groundwater contamination by inorganic parameters was not detected at the site.

6.3 GROUNDWATER

Chlorinated hydrocarbons were detected in two (2) of the eight (8) groundwater monitoring wells installed on-site at concentrations that exceed groundwater standards. Both of the wells (MW-4 and MW-8) are located to the north of, and hydrologically down-gradient from, the warehouse. As previously mentioned, chlorinated hydrocarbons are commonly associated with solvents used for degreasing metal parts. The compounds detected in the two (2) groundwater samples included trichloroethene (TCE), which is one of the most widely encountered groundwater contaminants, and degradation products of TCE. Relatively low concentrations of these compounds were also detected in the subsurface soil samples collected during the drilling of these wells.

TCE is quite soluble in water and is highly mobile in the subsurface. If spilled on the ground in quantities great enough to overcome the residual saturation, the pure phase of TCE may migrate vertically downward through an aquifer because it is denser than water. TCE and its degradation products were detected in groundwater on the former Roblin Steel site, which is situated hydrologically up-gradient from the subject property, during a previous investigation of that site. As such, the groundwater contamination detected on-site may be originating from an on-site source, such as industrial fill or chemical discharges to the ground surface that may have occurred in the past, or the contamination may be migrating onto the site from the former Roblin Steel site.

Lastly, an evaluation of the levels of metals detected in groundwater samples from the site indicated that, with the exception of samples from two (2) well locations, the concentrations of the inorganic parameters analyzed are relatively uniform across the site and are generally below the groundwater standards. Exceptions to this include iron and manganese, which were detected in all of the wells above the groundwater standards. The concentrations of numerous metals detected in the samples from MW-5 and MW-6, however, were markedly higher than the average concentrations of these parameters in the six (6) remaining wells, and exceed the applicable groundwater standards. Since the concentration of total solids in the samples from both MW-5 and MW-6 were elevated, the higher concentrations of metals may be attributable to sample turbidity.

TABLE 5-1

GROUNDWATER ANALYSIS SUMMARY – VOCs

(DETECTED COMPOUNDS ONLY)

COMPOUND	CONCENTRATION (PPB)		NYS AMBIENT WATER QUALITY STANDARDS * (PPB)
	MW-2	MW-4	
CHLOROETHENE	-	65	5
1,1-DICHLOROETHANE	96	82	5
1,1,1-TRICHLOROETHANE	280	110	5
TRICHLOROETHENE		9	5

NOTES: 1. * New York State Ambient Water Quality Standards and Guidance Values (June 1998).

2. ** New York State Guidance Value used where no Groundwater Standard was available.

TABLE 5-2

GROUNDWATER ANALYSIS SUMMARY – INORGANIC COMPOUNDS

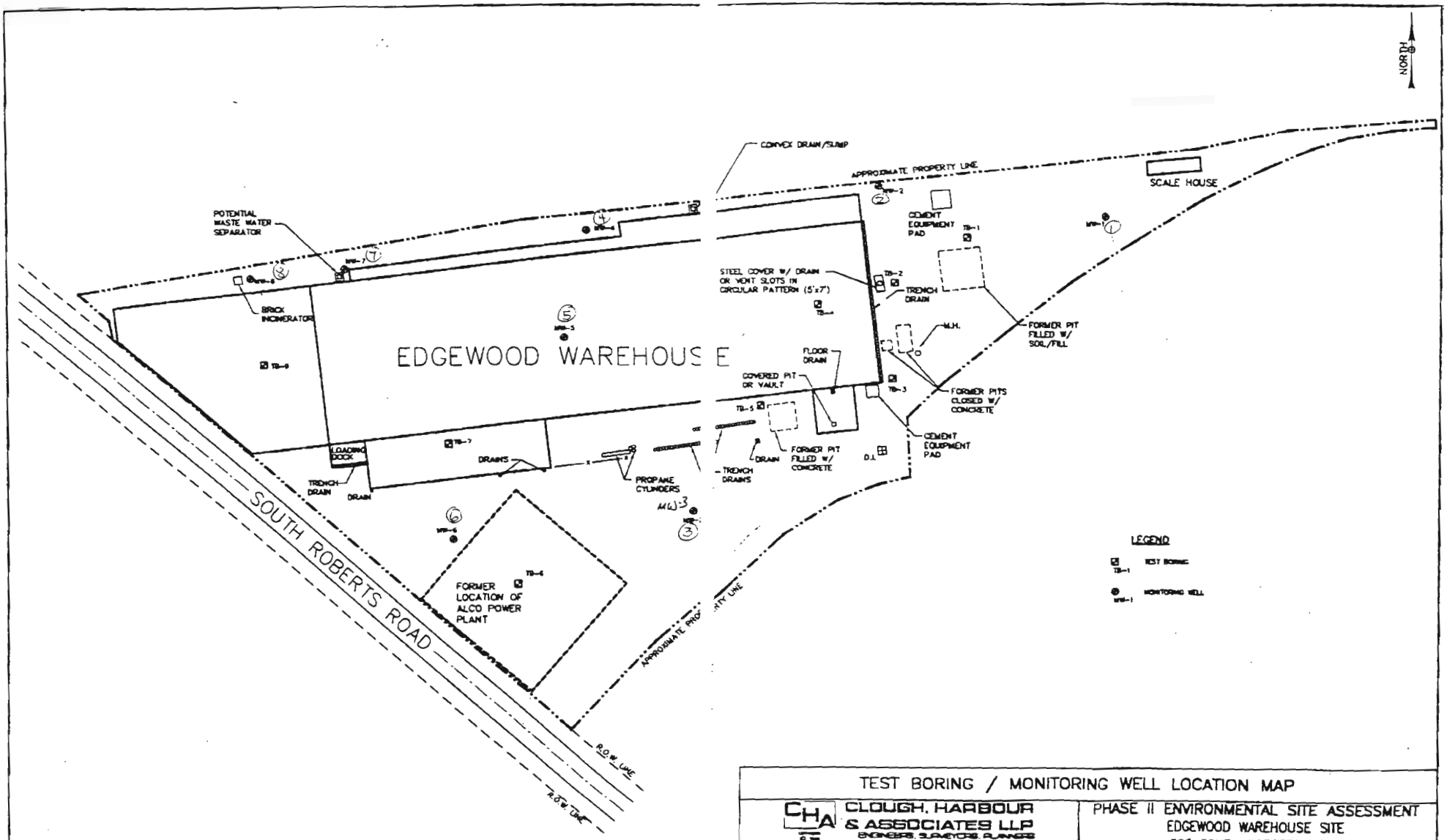
(ALL COMPOUNDS REPORTED)

COMPOUND	CONCENTRATION (PPM)									NYS AMBIENT WATER QUALITY STANDARDS * (PPM)
	MW-1	MW-2	MW-3	MW-4	MW-5	MW-6	MW-7	MW-8	BFD	
SOLIDS, DISSOLVED	-	-	394	-	1030	871	-	776	817	NA
ALUMINUM	2.69	8.67	.9	1.08	81.9	99.1	3.24	-	67	NA
ANTIMONY	-	-	-	-	-	-	-	-	-	.003
ARSENIC	.003	.008	-	.002	.021	.031	.004	.003	.01	.025
BARIUM	.138	.139	.11	.275	.298	1.26	.074	.083	.209	1.0
BERYLIUM	.002	.002	.002	.002	.009	.007	.002	.002	.008	.003 **
CADMIUM	-	.006	-	.007	.009	.01	-	-	.009	.005
CALCIUM	83.9	119	90	126	73.2	198	-	171	68.1	NA
CHROMIUM	-	.012	-	-	.573	.173	-	-	.312	.050
COBALT	-	-	-	-	.304	.104	.016	-	.27	NA
COPPER	-	.117	-	.02	.049	.323	.025	-	0.26	0.200
IRON	5.16	15.7	3.16	19.5	69.3	238	6.82	.214	44.4	0.300
LEAD	.016	.055	.004	.012	.029	0.2	.011	.001	0.16	0.025
MAGNESIUM	31.5	23.1	18.1	27.9	49.4	99.9	22.4	32.3	43.5	35.0**
MANGANESE	.335	1.72	2.91	1.66	9.79	2.94	.86	1.23	8.94	0.300
MERCURY	-	-	-	-	-	.003	-	-	-	0.0007
NICKEL	.017	.063	.032	.022	9.83	.292	.024	.025	8.89	0.100
POTASSUM	3.43	6.36	4.62	3.3	15.8	44.5	2.76	3.27	14.1	NA
SELENIUM	-	-	-	-	-	.003	-	-	-	0.010
SILVER	-	-	-	-	-	-	-	-	-	0.050
SODIUM	43.1	15.5	14	20.2	40.1	69.5	9.19	13.3	38.3	20.0
THALLIUM	-	-	-	-	.001	.004	-	-	-	0.0005**
VANADIUM	.01	.018	-	-	.061	.186	.012	-	.039	NA
ZINC	.15	.106	.063	.039	.535	.516	.121	.029	.443	2.0**

NOTES: 1. * New York State Ambient Water Quality Standards and Guidance Values (June 1998).

2. ** New York State Guidance Value used where no Groundwater Standard was available.

3. BFD – Blind field duplicate sample collected from monitoring well MW-5.

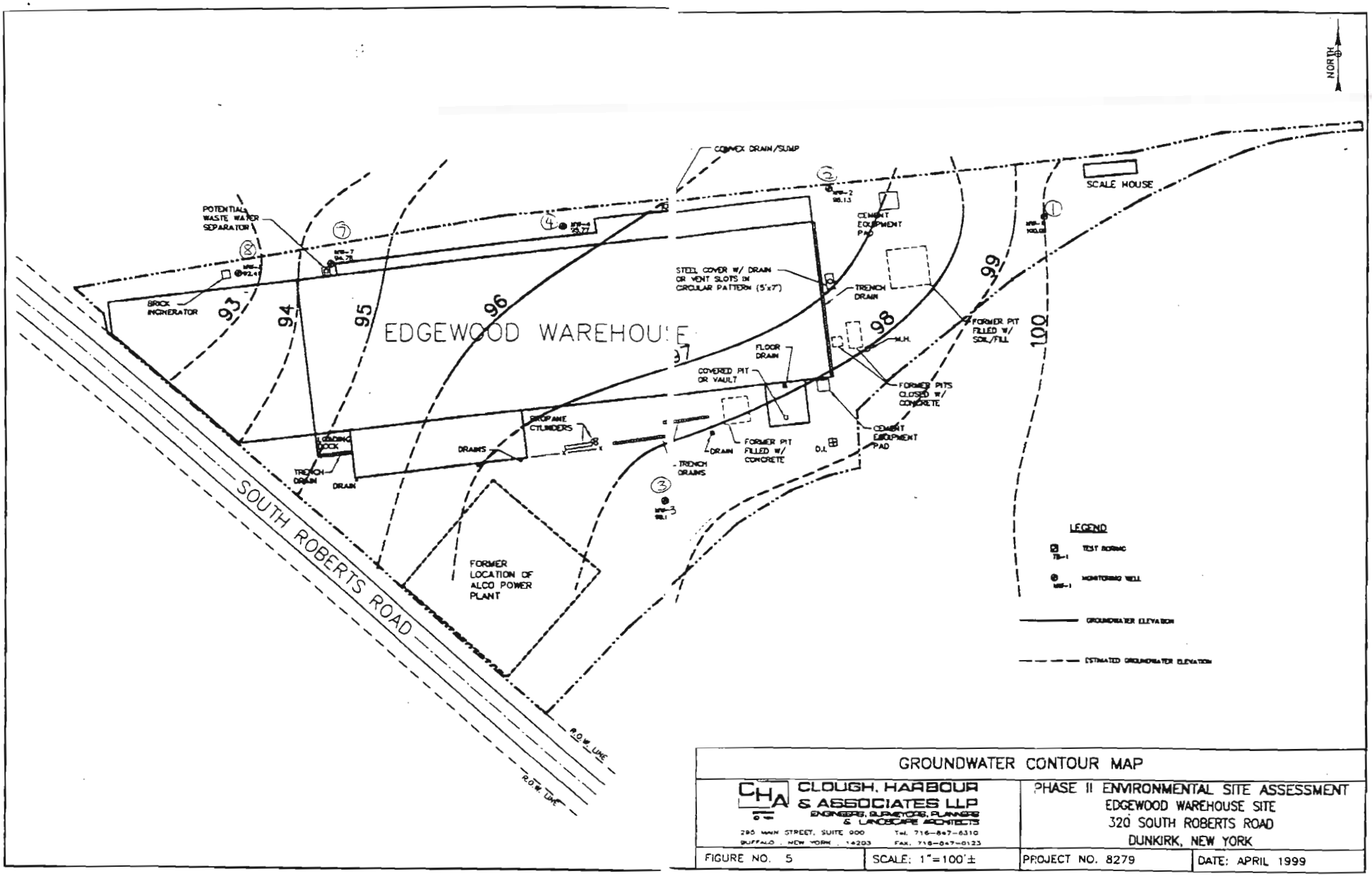


TEST BORING / MONITORING WELL LOCATION MAP

CLOUGH, HARBOUR & ASSOCIATES LLP
ENGINEERS, SURVEYORS, PLANNERS & LANDSCAPE ARCHITECTS
295 MAIN STREET, SUITE 900 Tel: 716-847-6310
BUFFALO, NEW YORK 14203 Fax: 716-847-0123

PHASE II ENVIRONMENTAL SITE ASSESSMENT
EDGEWOOD WAREHOUSE SITE
320 SOUTH ROBERTS ROAD
DUNKIRK, NEW YORK

FIGURE NO. 3	SCALE: 1"=100'±	PROJECT NO. 8279	DATE: APRIL 1999



GROUNDWATER CONTOUR MAP

CLOUGH, HARBOUR & ASSOCIATES LLP
ENGINEERS, SURVEYORS, PLANNERS & LANDSCAPE ARCHITECTS
295 MAIN STREET, SUITE 900 BUFFALO, NEW YORK 14203
TEL. 716-847-6310 FAX. 716-847-0123

PHASE II ENVIRONMENTAL SITE ASSESSMENT
EDGEWOOD WAREHOUSE SITE
320 SOUTH ROBERTS ROAD
DUNKIRK, NEW YORK

FIGURE NO. 5	SCALE: 1"=100'±	PROJECT NO. 8279	DATE: APRIL 1999

TVGA
CONSULTANTS

FAX TRANSMITTAL COVER

Office (716) 655-8842
Fax (716) 655-0937

TO:	NYSDEC
ATTN:	Mr. Greg Sutton
FAX:	(716)-851-7226
FROM:	William J. Czelusta, Jr.
DATE:	November 18, 2002
RE:	**Edgewood Warehouse PII ESA, Dunkirk, NY**

As requested, if you can't locate your copy let me know and I'll have someone make one for you!

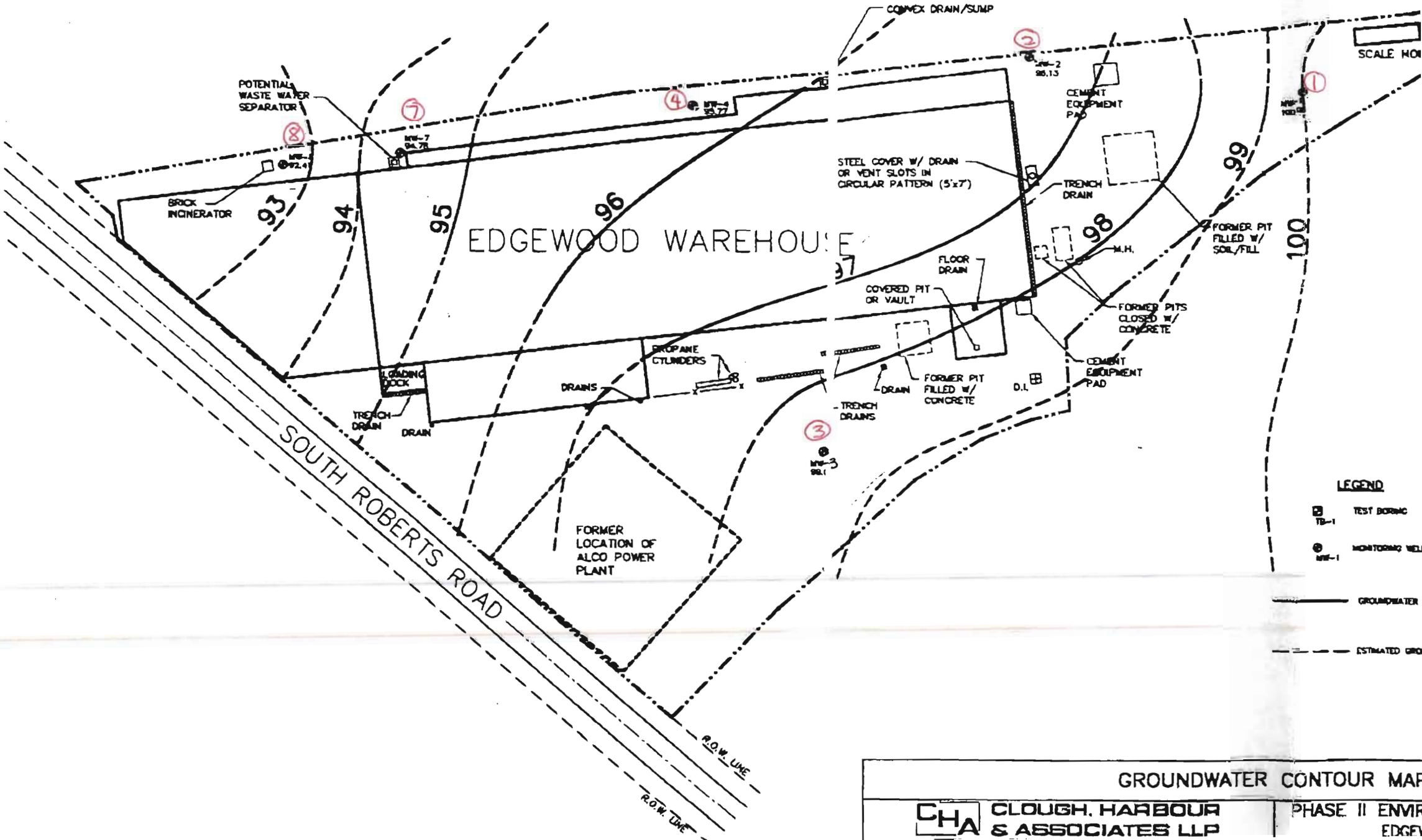
Very truly yours,

William J. Czelusta, Jr.

Bill

Project Scientist

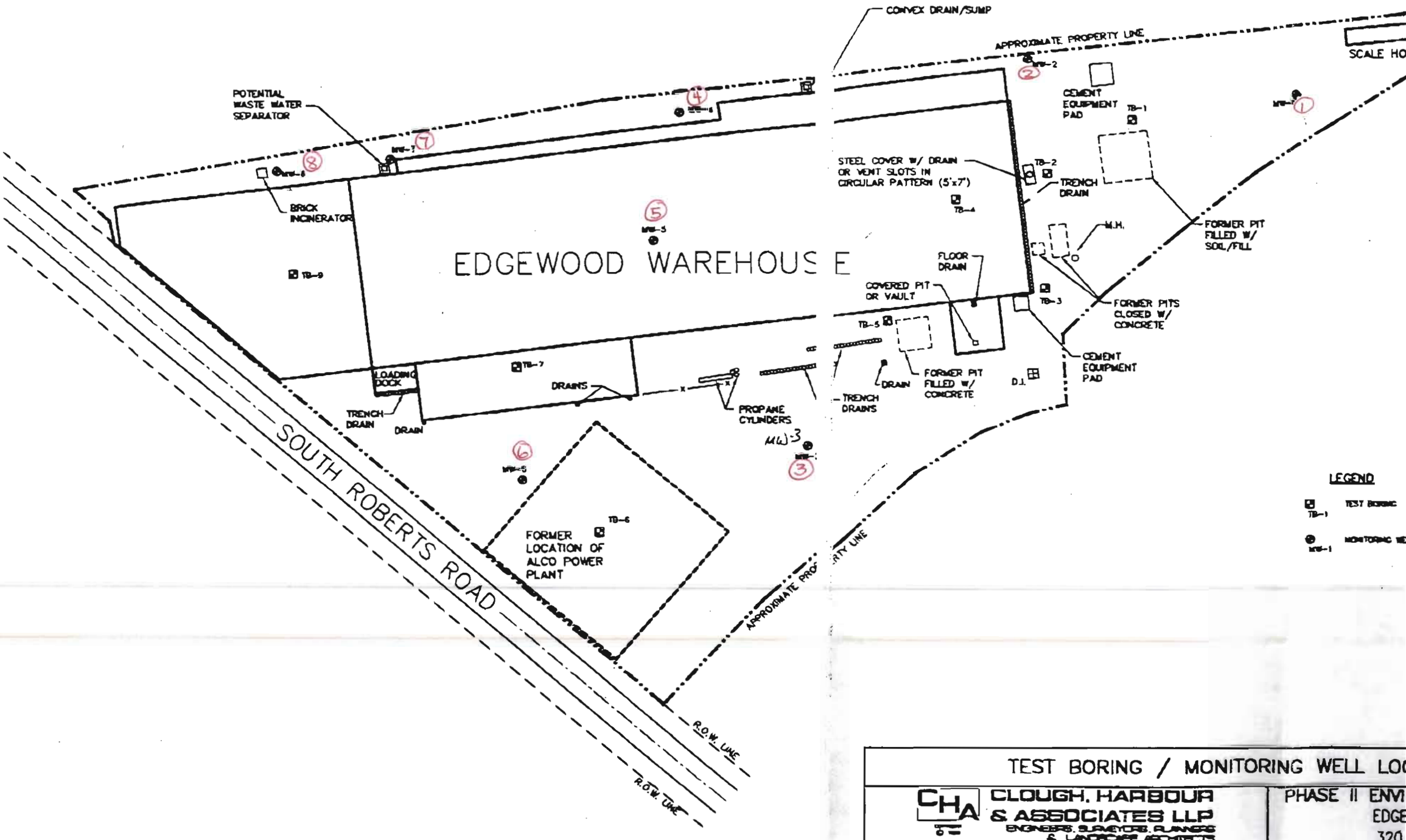
TOTAL PAGES SENT (Including this sheet 12)



GROUNDWATER CONTOUR MAP

CLOUGH, HARBOUR & ASSOCIATES LLP

PHASE II ENVIR
EDGEW



TEST BORING / MONITORING WELL LOC

CLOUGH, HARBOUR & ASSOCIATES LLP
ENGINEERS, SURVEYORS, PLANNERS & LANDSCAPE ARCHITECTS

PHASE II ENVI
EDGE
320

GREG SUTTON,
ANY UPDATE AFTER 12/13?

Region 9 - Consent Order Compliance Schedule Tracking System

Program	DEC Case Number	Inspector	Respondent	Date Addressed
SW - RCRA - Indl. Haz. Waste Mgmt., Article 27	B9-0542-98-10	Greg Sutton	West Falls Machine Company, Inc.	20021120

Due Date	Done	Description	Note
20021213	NO	Schedule B: Respondent shall submit by no later than December 13, 2002 an approvable site investigation work plan which will include a site description, work plan objectives, description of work, quality control/assurance requirements, a health & safety plan and the following items: - a review Green Environmental's field notes to confirm the location of sample point #12 noted in the Green Environmental Specialists, Inc. Groundwater Sampling Survey Final Report; - installation of a minimum of six soil boring around the area of sample point #12 to determine the horizontal and vertical extent of chromium contamination; - If the location of sample point #12 is not within the septic field area, additional soil borings shall be installed in the septic field area to determine the horizontal and vertical extent of contamination within the leach field; - Samples shall be analyzed for Priority Pollutant Metals (13 parameters) and screened with a PID meter and if the PID meter reading exceeds 5 ppm, a sample of soil and groundwater should be collected and analyzed for TCL VOA's; - At least one soil sample from the leach field shall be analyzed for TCLP metals; - Drill a sufficient number of soil borings and collect a sufficient number samples so that certain samples can be selected for analysis based on field conditions and others retained for later analysis, if necessary; - All samples shall be analyzed by an ELAP/DOH certified Laboratory using ASP methods including all necessary quality control procedures producing a Category B report; - A geophysical description of all soil borings including the borings already made for the final report shall be performed and a geologic profile provided; - Provide inside sump sampling data; - Install groundwater monitoring well(s) if the need for such is indicated by the gathered data.	

Updated By: _____

Printed December 10, 2002 Date Updated: _____