RCRA Corrective Action Environmental Indicator (EI) RCRIS code (CA725)

Current Human Exposures Under Control

Facility Name:

JMT Facility (former General Electric/Black & Decker Site)

Facility Address:

200 State Street, Brockport, NY 14420

Facility EPA ID #:

NYD002221919

1.	Has all available relevant/significant information on known and reasonably suspected releases to soil, groundwater, surface water/sediments, and air, subject to RCRA Corrective Action (e.g., from Solid Waste Management Units (SWMU), Regulated unites (RU), and Areas of Concern (AOC), been considered in this EI determination?					
	8					
		If data are not available skip to #6 and enter "IN" (more information needed) status code.				

BACKGROUND

Definition of Environmental Indicators (for the RCRA Corrective Action)

Environmental Indicators (EI) are measures being used by the RCRA Corrective Action program to go beyond programmatic activity measures (e.g., reports received and approved, etc.) to track changes in the quality of the environment. The two EIs developed to-date indicate the quality of the environment in relation to current human exposures to contamination and the migration of contaminated groundwater. An EI for non-human (ecological) receptors is intended to be developed in the future.

Definition of "Current Human Exposures Under Control" EI

A positive "Current Human Exposures Under Control" EI determination ("YE" status code) indicates that there are no "unacceptable" human exposures to "contamination" (i.e., contaminants in concentrations in excess of appropriate risk-based levels) that can be reasonably expected under current land- and groundwater-use conditions (for all "contamination" subject to RCRA corrective action at or from the identified facility (i.e., site-wide)).

Relationship of EI to Final Remedies

While Final remedies remain the long-term objective of the RCRA Corrective Action program the EI are near-term objectives which are currently being used as Program measures for the Government Performance and Results Act of 1993, GPRA). The "Current Human Exposures under Control" EI are for reasonably expected human exposures under current land- and groundwater-use conditions ONLY, and do not consider potential future land- or groundwater-use conditions or ecological receptors. The RCRA Corrective Action program's overall mission to protect human health and the environment requires that Final remedies address these issues (i.e., potential future human exposure scenarios, future land and groundwater uses, and ecological receptors).

Duration / Applicability of EI Determinations

EI Determinations status codes should remain in RCRIS national database ONLY as long as they remain true (i.e., RCRIS status codes must be changed when the regulatory authorities become aware of contrary information).

Are groundwater, soil, surface water, sediments, or air media known or reasonably suspected to be "contaminated" above appropriately protective risk-based "levels" (applicable promulgated standards, as well as other appropriate standards, guidelines, guidance, or criteria) from releases subject to RCRA Corrective Action (from SWMUs, RUs or AOCs)?

	Yes	No	_?_	Rationale / Key Contaminants			
Groundwater	<u>X</u>			Groundwater monitoring: Volatile Organic Contaminants			
				(VOCs).			
Air (indoors) ²	_X_			Soil sampling & Groundwater Data: VOCs.			
Surface Soil (e.g	., <2 ft)	\mathbf{X}	3 <u> </u>	Soil sampling: PCBs			
Surface Water	v. 	X		See CA750 for detailed discussion of this medium.			
Sediment	<u>X</u>			Sediment sampling: PCBs			
Subsurf. Soil (e.	g., >2 ft) X			Soil sampling: PCBs.			
Air (outdoors)		X		No impact from facility releases.			
	, (,,,						
	medium could p	ose an	unacceptab	" (or provide an explanation for the determination that the le risk), and referencing supporting documentation. to #6 and enter "IN" status code.			

Rationale and Reference(s): Facility and Release Sources

Site Description: The facility is located at 200 State Street in Brockport, New York. The facility is approximately 28.6 acres is size, and is located in a largely industrial area. The facility is bounded to the north by State Street and the New York State Barge Canal, to the east by the Owens-Illinois, Inc. facility, and to the west by the Brockport Cold Storage Company facility (See Figure 1). The former 3M/Dynacolor site, a listed inactive hazardous waste disposal site, is also located on the west side of the facility. To the south of the facility are railroad tracks and other industrial facilities. The property was originally used as a New York State fairground. It was subsequently purchased by New York Frozen Foods, Inc., and was developed into a cold storage business. The original plant building still exists, but the plant building is currently larger due to various additions constructed over time by GE.

GE owned and operated the facility from 1949 to 1984. Black & Decker purchased the property in 1984 and operated the facility through 1986. Both GE and Black & Decker manufactured small household electrical appliances, including mixers, electric knives, can openers, etc. The County of Monroe Industrial Development Agency (COMIDA) purchased the facility from Black & Decker in 1988 and leased the facility to Kleen-Brite Laboratories, Inc. (Kleen-Brite), which used the facility for packaging various household products. JMT purchased the property from COMIDA in 1993. The site is

[&]quot;Contamination" and "contaminated" describes media containing contaminants (in any form, NAPL and/or dissolved, vapors, or solids, that are subject to RCRA) in concentrations in excess of appropriately protective risk-based "levels" (for the media, that identify risks within the acceptable risk range).

Recent evidence (from the Colorado Dept. of Public Health and Environment, and others) suggest that unacceptable indoor air concentrations are more common in structures above groundwater with volatile contaminants than previously believed. This is a rapidly developing field and reviewers are encouraged to look to the latest guidance for the appropriate methods and scale of demonstration necessary to be reasonably certain that indoor air (in structures located above (and adjacent to) groundwater with volatile contaminants) does not present unacceptable risks.

currently vacant.

GE and then Black & Decker operated a hazardous waste treatment/storage/disposal (TSD) facility under interim status. Operations at the facility that generated wastes included various cleaning, degreasing, electroplating and metal finishing operations. The TSD units included six surface impoundments and one sludge drying bed. Closure of these units was completed in August 1987 in accordance with a NYSDEC approved Closure Plan. The facility is currently in the post-closure care period, which began on October 13, 1988. The facility was issued a NYS Part 373 Post-Closure Permit for the post-closure care of these units. The permit also specifies requirements for corrective action.

Groundwater

Groundwater is contaminated with solvents related to historic plating operations that were conducted at the site. Trichlororethene (TCE) is the primary contaminant, and the related TCE breakdown products cis-1,2-dichloroethene (1,2-DCE) and vinyl chloride are also present. 1,1,1-trichloroethane is also present in certain areas. Concentrations of TCE range up to approximately 50 parts per million (or 50,000 parts per billion) in certain areas of the site. These values are far above the protective levels which are 5 parts per billion, or lower. NYSDEC Technical Operation Guidance Series (TOGS) 1.1.1 provides a compendium of "protective" levels for ambient water quality criteria for New York State waters, including groundwater. TOGS 1.1.1 was last updated in 1998. Current groundwater quality conditions at this site are monitored quarterly, and reported semi-annually, as required by a 6NYCRR Part 373 Post-Closure Permit.

The facility has been conducting groundwater monitoring since the early 1980s. In response to evidence of a release, a groundwater migration control system was installed at the site and began operation in 1988. Quarterly performance monitoring of this system has been conducted since that time. The system initially included a 300-foot long collection system that was constructed in the bedrock through the use of controlled blasting. Blasting was used to insure a continuous hydraulically connected zone was created in the bedrock. The on-site groundwater migration control system was enhanced during 1999. During this work approximately 150 additional feet of trench was blasted, and part of the original installation was refractured (See Figure 1 for location of fracture zone and monitoring well network). The enhancements were undertaken to make the system more robust and to address concerns about declining hydraulic performance of the original system. Results following system enhancements show increased yields from the system and improved hydraulic performance (See Figures 2 and 3 for recent overburden and upper bedrock potentiometric maps). Water quality monitoring shows that groundwater downgradient of the migration control system is meeting ambient water quality criteria, indicating that contaminant migration from the site is being effectively controlled.

During the mid-1990s the NYSDEC required groundwater investigations downgradient of the site to determine if contamination had migrated off-site prior to installation of the groundwater migration control system. Results from this investigation showed that a remnant plume is present off-site, under a residential area. A quarterly groundwater monitoring program includes monitoring both on-site and in the off-site area. Results from this program show that groundwater quality in the off-site area is stable over the approximate 6 year period that the off-site well network has been in place.

In response to the presence of the off-site plume, an off-site groundwater recovery and treatment system was constructed and placed in operation during 2001 (See Figure 4 for site plan of this system). This system, located at 98 Lyman Street, has been implemented as part of an Off-Site Groundwater Interim Corrective Measures Implementation Plan. This plan describes the measures that are currently being taken to reduce contaminant levels in the heart of the off-site plume, as well as requiring a future assessment of the effectiveness of these actions. Following completion of the monitoring program specified in the Off-Site Groundwater Interim Corrective Measures Implementation Plan, the NYSDEC will make a final remedy determination regarding further remedial action and monitoring that may be needed for this area.

Key Groundwater Contaminants: trichloroethene, cis-1,2-dichloroethene, 1,1,1-trichloroethane, vinyl chloride

Indoor Air

Investigations have shown that hazardous waste constituents have been released to the soil and groundwater beneath the facility. Thus, there is a possibility that there may be some contaminants impacting the indoor air quality in the building located at the facility. The facility ceased operations in July 2001. There are no active process and/or administrative areas at the facility. The building at the facility is currently vacant. Even though there is a possibility that air quality inside the

buildings is impacted by underlying contamination, absence of any potential receptors eliminates any current concern regarding human exposure and its impact on human health for the on-site area.

A residential sampling program that included indoor air testing for buildings located over the off-site plume was performed. This is discussed in detailed in response to question No.3 of this EI.

Key Potential Indoor Air Contaminants: trichloroethene, cis-1,2-dichloroethene, 1,1,1-trichloroethane, vinyl chloride

Soils

Soil sampling conducted during an assessment related to the storm sewer system identified the presence of elevated levels of PCBs at the site. Interim corrective measures have been completed, removing surficial soils that had concentrations above 1 ppm of PCB. Deeper soils with PCB concentrations greater than 1 ppm remain at the site, but are not accessible (under the concrete foundation of a part of the building).

Soils were also investigated in the Prior Sludge Application Area (PSAA). This showed elevated nickel and chromium in the PSAA soils. In 1997 final corrective measures were selected and implemented (excavation and off-site disposal). As a result of that action, soils were cleaned to residential use criteria (unrestricted use) for chromium and nickel, even though it is an industrial site.

VOCs have been detected in soils on the east side of the main manufacturing building, but at levels below NYSDEC TAGM 3028 soil comparison values.

<u>Key Soil Contaminants</u>: polychlorinated biphenyls, chromium, nickel, trichloroethene, cis-1,2-dichloroethene, 1,1,1-trichloroethane, vinyl chloride.

Sediment

Sediment sampling conducted during an assessment related to the storm sewer system identified the presence of elevated levels of PCBs at the site (see Figure 5 for on-site storm sewer locations). Interim corrective measures have been completed on-site, removing debris and sediment from the sewer and also excavating contaminated surface soils. During these actions, a segment of the storm sewer (line 2 near the east side of the building) was also in-situ-formed. Performance monitoring shows that these and other response actions have significantly reduced sediment PCB concentrations, but values above 1 ppm were still present at certain locations. Additional storm sewer cleaning and sediment removal have been subsequently performed. Effectiveness monitoring and period vacuuming of the sediement trap and elected manholes is ongoing.

An extensive sampling program was conducted along the storm water drainageway downstream of the facility (see Figure 6). Testing showed elevated PCB concentrations in the sediments and soils along the drainageway. Part of this drainageway passes through a residential area. Soils and sediments within the residential area with PCB concentrations greater than 1 ppm were excavated and disposed of at permitted disposal sites. This excavation work occurred primarily within the stream segments labeled Stream Segment No.1 and Stream Segment No. 2 as shown on Figure 6. In addition sediment and debris within the storm sewer piping in the off-site area was also cleaned out and disposed at permitted disposal facilities. These cleanup actions were conducted under an interim measures implementation plan (ICMI) plan reviewed in conjunction with the NYSDOH and approved by the NYSDEC, and was completed during 2002. During 2003 soil and sediment with PCB levels greater than 1 ppm were removed from a non-residential area (Stream Segment No. 3 as shown on Figure 6), located farther downstream on the same drainageway. This work was also conducted under an interim measures implementation plan (ICMI) plan reviewed in conjunction with the NYSDOH and approved by the NYSDEC.

There is a tar coating on portions of the corrugated metal pipe (CMP) that is used in part of the off-site storm sewer system. Testing has shown elevated PCB concentrations in the tar coating that is present on the inside of the pipe, within the pipe sections that were previously cleaned during the ICMI. The cleaning only removed sediment and debris from the pipe, and did not remove the tar. It appears that the tar that was applied to the pipe prior to its installation has been contaminated by discharges passing through the pipe. The tar is generally not accessible because it is attached to the inside of the pipe. Some fragments of tar have been found within the stream segments following storm events, so the NYSDEC has been

requiring patrol and collection of tar at these times. GE/Black and Decker have also implemented an interim action plan to remove delaminating tar from the inside of the pipe. The latter work was completed in September 2003. GE/Black and Decker have also agreed to remove or clean affected storm sewer pipe that is tar coated. This sewer replacement work will begin during the fall of 2003. See Figure 7 for locations where tar-coated CMP will be removed or the tar coating removed, during the fall of 2003. Replacement of the buried storm sewer pipe within the residential area north of the canal, between Stream Segment No. 1 and Stream Segment No.2, is planned to be completed during the 2004 construction season.

In October 2001, the New York State Department of Health offered free blood serum PCB testing to current and former residents of the eight homes adjacent to Segments # 1 and 2 of Tributary No. 3 in Brockport. It is reasonable to believe that residents of these homes would have had a greater likelihood of repeated exposure to the tributary PCBs. The results of this sampling program indicate that people living in homes adjacent to the PCB-contaminated Tributary No. 3 in Brockport do not have levels of PCBs in their blood that are above those found in the general population.

Based on the results of this study, additional blood serum PCB sampling in the Brockport community was not recommended. This investigation reported on individuals who, based on currently available environmental sampling data, live in the area with the greatest potential for exposure to PCBs in and along Tributary No. 3. The findings indicate that these individuals had levels of PCBs in their blood typical of the general population. This testing was conducted prior to any clean-up of the drainageway, when concentrations of PCBs far above 1 ppm were present in potentially accessible soils. Now that the soils have been remediated to PCB levels less than 1 ppm, under a plan reviewed and approved by the NYSDOH and NYSDEC, existing conditions are considered protective.

Key Sediment Contaminants: polychlorinated biphenyls

References: Post-Closure Permit Application, Black & Decker, 1987; NYSDEC Technical Operation Guidance Series (TOGS) 1.1.1, June 1998; NYSDEC TAGM 3028 Contained-In Criteria, 1997; 6NYCRR Part 373 Permit for Facility I.D.# NYD002221919; JMT Facility Outside Container Storage Area/Degreaser Area RCRA Facility Investigation Report, August 1996; JMT Facility Prior Sludge Application Area RFI Report, 1996; JMT Facility Prior Sludge Application Area Statement of Basis; Prior Sludge Application Area Construction Certification Report, June 1998; JMT Facility Outside Container Storage Area/Degreaser Area Corrective Measures Study Report, January 2000; Waste Oil Container Storage Area Sampling Visit Report; Residential Sampling Program Report, January 1997; House #4 ICMI Plan, June 1996; House #6 ICMI Plan, January 1997; Storm Sewer Assessment Report November 2001; On-Site Storm Sewer Pre-Design Work Plan, 2001; JMT Facility 2002 Annual Groundwater Monitoring Report, January 2003; JMT Facility Compliance Monitoring Program Sampling and Analysis Plan, June 1999; Off-Site Groundwater Investigation Report, August 1996; Off-Site Groundwater Interim Corrective Measures Implementation Plan, February 2000; Off-Site Tributary #3 Storm Water Drainageway ICMI Plan; On-Site Storm Sewer ICMI Plan; Tributary #3, Brockport, NY, Blood Serum PCB Sampling Program, NYSDOH, June 2002; On-Site ICMI Effectiveness Monitoring Plan; On-Site Storm Sewer System Interim Corrective Measures Implementation Plan, March 2002, as amended May 2002; Off-Site Storm Water Drainageway Interim Corrective Measures Implementation Plan, April 2002, as amended May 2002, August 2002 and September 2002; Off-Site Storm Water Drainageway Interim Corrective Measures Implementation Plan, Amendment No. 1, September 2003.

3. Are there complete pathways between "contamination" and human receptors such that exposures can be reasonably expected under the current (land- and groundwater-use) conditions?

Summary Exposure Pathway Evaluation Table

"Contaminated" Media	Residents	Workers	Day-Care	Construction	Trespassers	Recreation	Food ³
Groundwater	NO	NO	NO	YES			NO
Air (indoors)	NO	YES	NO				
Soil (surface, e.g., <2 ft)	<u>NO</u>	NO	NO	NO	NO	NO	NO
Surface Water						# 50 B	- Table
Sediment	<u>NO</u>	NO		YES			
Soil (subsurface e.g., >2 ft)				YES			NO
Air (outdoors)							

Instructions for Summary Exposure Pathway Evaluation Table:

- 1. Strike-out specific Media including Human Receptors' spaces (for Media which are not "contaminated") as identified in #2 above.
- 2. Enter "yes" or "no" for potential "completeness" under each "Contaminated" Media Human Receptor combination (Pathway).

Note: In order to focus the evaluation to the most probable combinations, some potential "Contaminated: Media - Human Receptor combinations (Pathways) do not have check spaces ("____"). While these combinations may not be probable in most situations, they may be possible in some settings and should be added as necessary.

	If no (pathways are not complete for any contaminated media-receptor combination) - skip and enter "YE" status code, after explaining and/or referencing condition(s) in-place, when natural or man-made, preventing a complete exposure pathway from each contaminated media-receptor combination of the contaminated media-receptor combination of the contaminated media-receptor combination) - skip and enter "YE" status code, after explaining and/or referencing condition(s) in-place, when natural or man-made, preventing a complete exposure pathway from each contaminated media-receptor combination) - skip and enter "YE" status code, after explaining and/or referencing condition(s) in-place, when natural or man-made, preventing a complete exposure pathway from each contaminated media-receptor combination) - skip and enter "YE" status code, after explaining and/or referencing condition(s) in-place, when natural or man-made, preventing a complete exposure pathway from each contaminated media-receptor combination and the contaminated media-receptor combination and the combination of the combin					
<u>X</u>	If yes (pathways are complete for any "Contaminated" Media - Human Receptor combination) - continue after providing supporting explanation.					
	If unknown (for any "Contaminated" Media - Human Receptor combination) - skip to #6 and enter "IN" status code.					

Rationale and Reference(s):

Groundwater:

Groundwater is not used for drinking water or other purposes. The only plausible exposure pathway would be for construction activities involving deep excavations on-site in areas with the highest concentrations of VOCs. The concern would be posed by volatilization and possible inhalation, not with direct dermal contact with the water. For more detailed information about the groundwater, please refer to the response to Question No. 2 above.

<u>Indoor Air:</u>

Investigations have shown that hazardous waste constituents have been released to the soil and groundwater beneath the facility. Thus, there is a possibility that there may be some contaminants impacting the indoor air quality in the building located at the facility. The facility ceased operations in July 2001. There are no active process and/or administrative areas at the facility. The building at the facility is currently vacant. Even though there is a possibility that air quality inside the buildings is impacted by underlying contamination, absence of any potential receptors eliminates any concern regarding human exposure and its impact on human health.

An off-site residential sampling program that was reviewed by the NYSDEC and approved by the NYSDOH, was

conducted to evaluate potential exposures to VOCs in the residential area overlying the groundwater plume. As a result of this testing program, and following consultation with the NYSDOH, abatement measures were implemented at two houses. These measures have blocked the exposure pathway (no potential receptors) eliminating concern posed by this medium.

Key Potential Contaminants: trichloroethene, cis-1,2-dichloroethene, 1,1,1-trichloroethane, vinyl chloride

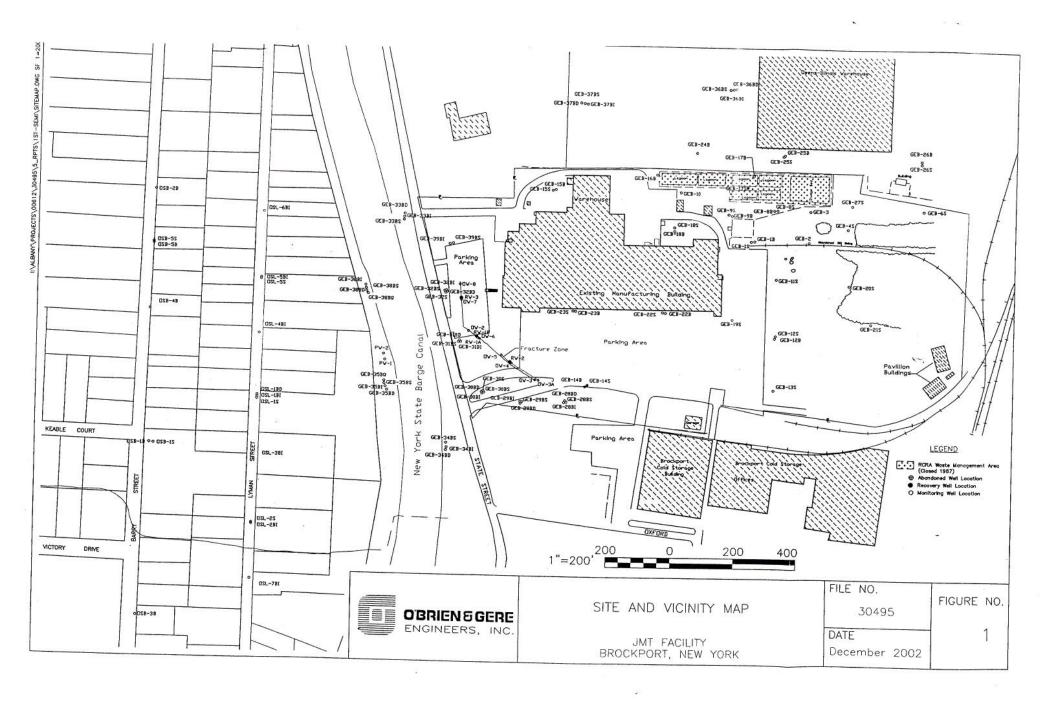
Surface Soils and Subsurface Soils: The only soils that could pose a potential concern through direct contact/ingestion are soils located below a concrete slab under a part of the building. These soils contain PCBs with a maximum reported value of approximately 110 ppm. Due to their position, these soils are effectively inaccessible, and any exposure pathway associated with these soils is effectively blocked. As a registered inactive hazardous waste site, any significant change in use (such as demolition of the building and removal of the foundation) would trigger notification of the NYSDEC and NYSDOH pursuant to the 6NYCRR Part 375 regulations. Through this notification mechanism, NYSDEC and/or NYSDOH are provided an opportunity to impose requirements that may be warranted to protect both workers and the surrounding community. This could involve requiring a Health and Safety plan for the action that addresses both workers and the community. The site is not used for recreation or food production. In addition, any new owner of the facility would be a co-permittee, and would be subject to the corrective action requirements of the 6NYCRR Part 373 post-closure permit, as well as post-closure care requirements for the closed waste management area (location of former impoundments).

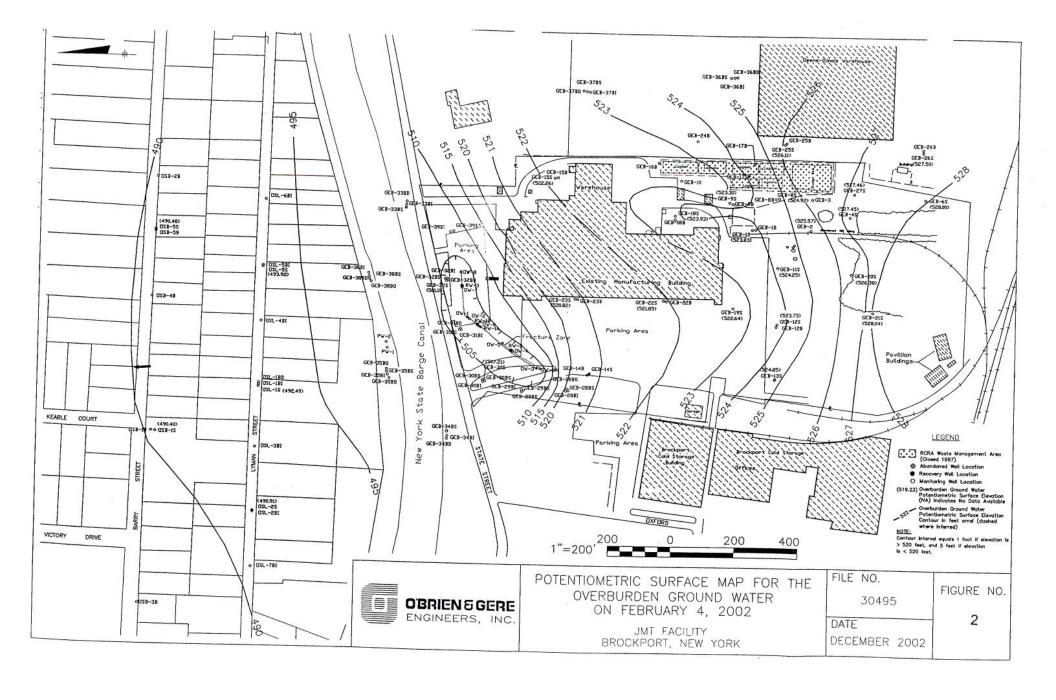
<u>References:</u> 6NYCRR Part 375; JMT Facility 6NYCRR Part 373 Post-Closure Permit, References: Work Plan for Interim Corrective Measures at House No. 4, JMT Facility, June 11, 1996; Work Plan for Interim Corrective Measures at House No. 6, JMT Facility, January 9, 1997; JMT Facility Residential Sampling Program Report, January 1997; Storm Sewer Assessment Report November 2001.

4.	Can the exposure from any of the complete pathways identified in #3 be reasonably expected to be "significant" (i.e., potentially "unacceptable" because exposures can be reasonably expected to be: 1) greater in magnitude (intensity, frequency and/or duration) than assumed in the derivation of the acceptable "levels" (used to identify the "contamination"); or 2) the combination of exposure magnitude (perhaps even though low) and contaminant concentrations (which may be substantially above the acceptable "levels") could result in greater than acceptable risks)?					
	<u>X</u>	If no (exposures can not be reasonably expected to be significant (i.e., potentially "unacceptable") for any complete exposure pathway) - skip to #6 and enter "YE" status code after explaining and/or referencing documentation justifying why the exposures (from each of the complete pathways) to "contamination" (identified in #3) are not expected to be "significant".				
		If yes (exposures could be reasonably expected to be "significant" (i.e., potentially "unacceptable") for any complete exposure pathway) - continue after providing a description (of each potentially "unacceptable" exposure pathway) and explaining and/or referencing documentation justifying why the exposures from each of the remaining complete pathways) to "contamination" (identified in #3) are not expected to be "significant".				
		If unknown (for any complete pathway) - skip to #6 and enter "IN" status code.				
Rationa	ale and Reference	<u>e(s):</u>				
See resp	onses to question	ns 2 and 3.				
		×				
5.	Can the "signifi	cant" exposures (identified in #4) be shown to be within acceptable limits?				
		If yes (all "significant" exposures have been shown to be within acceptable limits) - continue and enter "YE" after summarizing <u>and</u> referencing documentation justifying why all "significant" exposures to "contamination" are within acceptable limits (e.g., a site-specific Human Health Risk Assessment).				
		If no (there are current exposures that can be reasonably expected to be "unacceptable") - continue and enter "NO" status code after providing a description of each potentially "unacceptable" exposure.				
	-	If unknown (for any potentially "unacceptable" exposure) - continue and enter "IN" status code.				
Rationa	ale and Reference	re(s):				
Not app	licable, see respo	nses to questions 2, 3 and 4.				
Access to the second						

If there is any question on whether the identified exposures are "significant" (i.e., potentially "unacceptable") consult a human health Risk Assessment specialist with appropriate education, training and experience.

Check the appropriate RCRIS status codes for the Current Human Exposures Under Control EI event code (CA 725), and obtain Supervisor (or appropriate Manager) signature and date on the EI determination below (and attach appropriate supporting documentation as well as a map of the facility):							
X_	YE - Yes, "Current Human Exposures Under Control" has been verified. Based on a review of the information contained in this EI Determination, "Current Human Exposures" are expected to be "Under Control" at the <u>JMT Properties, Inc.</u> facility, EPA ID# NYD002221919, located at 200 State Street, Brockport, NY under current and reasonably expected conditions. This determination will be re-evaluated when the Agency/State becomes aware of significant changes at the facility.						
	NO - "Current Hur	nan Exposures" are N	OT "under Control"	, .			
	IN - More informa	tion is needed to make	a determination.				
Approved by:	150 E	7M_		Date: September 30, 2	.003		
	Stephen G. Malsan Environmental Eng New York State Do		nental Conservation	(NYSDEC)			
	And						
	Robert J P.	In the second	a e	Date: 9/30/03			
Supervisor:	Robert J. Phaneuf Chief, Hazardous V NYSDEC	Waste Engineering We	estern Section	Date: 7/30/03			
	Edwin Dassatti Director, Bureau o NYSDEC	f Hazardous Waste an	d Radiation Manag	ement			
Locations where	References may be	found:					
625 Bro	n of Solid and Hazar	dous Materials					
Contact telephon	e and e-mail number	rs					
Step	hen Malsan	(518) 402-8594	E-Mail: sgm	alsan@gw.dec.state.ny.us			





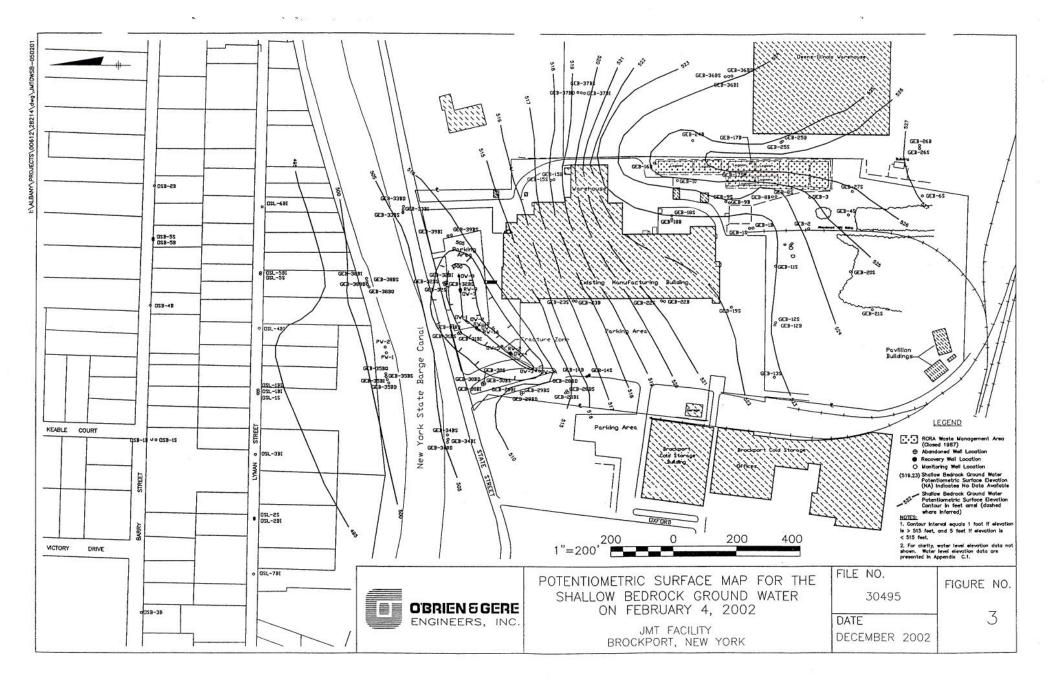


Figure 4 - Off-Site Groundwater Interim Corrective Measures

