DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION

RCRA Corrective Action
Environmental Indicator (EI) RCRAInfo code (CA750)
Migration of Contaminated Groundwater Under Control

Facility Name: **Industrial Environmental Systems Inc.**
Facility Address: **Old Kings Highway, Saugerties, NY**
Facility EPA ID #: **NYD000707885**

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 EI 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 "Migration of Contaminated Groundwater Under Control" EI

A positive "Migration of Contaminated Groundwater Under Control" EI determination ("YE" status code) indicates that the migration of groundwater has stabilized, and that monitoring will be conducted to confirm that contaminated groundwater remains within the original "area of contaminated groundwater" (for all groundwater "contaminated" 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 "Migration of Contaminated Groundwater Under Control" EI pertains ONLY to the physical migration (i.e., further spread) of contaminated ground water and contaminants within groundwater (e.g., non-aqueous phase liquids or NAPLs). Achieving this EI does not substitute for achieving other stabilization or final remedy requirements and expectations associated with sources of contamination and the need to restore, wherever practicable, contaminated groundwater to be suitable for its designated current and future uses.

Duration / Applicability of EI Determinations

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

1. Has **all** available relevant/significant information on known and reasonably suspected releases to the groundwater media, subject to RCRA Corrective Action (e.g., from Solid Waste Management Units (SWMU), Regulated Units (RU), and Areas of Concern (AOC)), been **considered** in this EI determination?

   X If yes - check here and continue with #2 below.

   _____ If no - re-evaluate existing data, or

   _____ If data is not available, skip to #8 and enter "IN" (more information needed) status code.

BACKGROUND

The Industrial Environmental Systems, Inc. facility stored and blended industrial waste solvents used as a fuel at the Northeast Solite Corporation rotary kilns from 1976 to the early 1980's. The Industrial Environmental Systems, Inc. facility is located entirely within the property of the Northeast Solite Corporation, which is currently a lightweight aggregate manufacturing plant (figure 1). The facility utilized nine (9) above ground storage tanks (ASTs) to blend, isolate, and transfer hazardous waste derived fuel to the Northeast Solite rotary kilns. The NYSDEC determined that the facility's use and storage of spent solvents constituted the operation of a hazardous waste storage site requiring a permit in 1981 and an Order on Consent was subsequently signed. As a result of signing the Order on Consent, Industrial Environmental Systems, temporarily ceased its hazardous waste storage operations and was required to conduct a subsurface investigation.

The facility was issued a Summary Abatement Order in 1982 by the NYSDEC due to polychlorinated biphenyl (PCB) contamination in the waste solvents. Thereafter, enforcement and permit revocation proceedings began against Industrial Environmental Systems.

Numerous investigations were conducted in the 1980's as part of the Order on Consent. On-site shallow groundwater monitoring wells showed contamination of Volatile Organic Compounds (VOCs) and PCBs related to spills in the immediate vicinity of the tank farm. Seepage from a bedrock face north of the tank farm was also observed. Sampling locations are shown on Figure 2. Prior to the implementation of the closure plan, initial concentrations of VOCs, including acetone (590 parts per billion (ppb)), methyl ethyl ketone (450 ppb), methyl isobutyl ketone (470 ppb), 1,1,1-trichloroethane (710 ppb), 1,1,2-trichloroethane (82 ppb), trans-1,2-dichloroethene (118 ppb), xylene (580 ppb), toluene (500 pp), benzene (46 ppb), and ethylbenzene (16 ppb) were detected above standards in groundwater (Table 1). However, low level organic contamination and improving conditions at the facility was observed during the facility monitoring program conducted between 1983 and 1987 following implementation of the RCRA closure plan. In addition data collected during a 2004 investigation at the facility indicated that underlying groundwater is not significantly impacted (See Tables 2-5). Sampling locations are shown on Figure 3.

2. Is **groundwater** known or reasonably suspected to be **"contaminated"**[1] above appropriately

[1]"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 appropriate "levels"

protective "levels" (i.e., applicable promulgated standards, as well as other appropriate standards, guidelines, guidance, or criteria) from releases subject to RCRA Corrective Action, anywhere at, or from, the facility?

____ If yes - continue after identifying key contaminants, citing appropriate "levels," and referencing supporting documentation.

_**X**__ If no - skip to #8 and enter "YE" status code, after citing appropriate "levels," and referencing supporting documentation to demonstrate that groundwater is not known or reasonably suspected to be "contaminated."

_____ If unknown - skip to #8 and enter "IN" status code.

Rationale:

By late 1983, Industrial Environmental Systems had removed all PCB- contaminated material from the storage tanks and no further shipments of hazardous waste were received.

As part of the RCRA closure plan from 1983 to 1986, activities at the facility resulted in the removal of all the underground pipelines. Areas with contaminated soil were excavated and backfilled with clean material. A collection system was installed to collect water from the bedrock seep for treatment and disposal. A four-inch thick, weather-sealed macadam cover was installed in the excavated area, which was in the vicinity of fuel tanks, fuel lines, and the bedrock seep. Industrial Environmental Systems, Inc received approval from NYSDEC of the closure certification on July 6, 1988.

A focused remedial investigation was conducted at the facility in May 2004 under an Order on Consent with the Department (Figure 3). Groundwater data (Tables 2 through 5) demonstrate that the site's underlying groundwater is not significantly impacted by metals, VOCs, semi-VOCs or PCBs and remediation efforts as part of the RCRA closure plan were effective in addressing historical, subsurface contamination issues.

References:

Groundwater conditions prior to the issuance of the post-closure permit are described in the 1984 and 1985 *Tank Farm Monitoring Well Installation and Groundwater Quality Analysis Reports*. Groundwater data collected since that time have been submitted in the *1991 Groundwater Monitoring Analysis Report*, the *1999 Summary of Closure and Remedial Activities Report* and the *2005 Focused Remedial Investigation Report.*

3. Has the **migration** of contaminated groundwater **stabilized** (such that contaminated groundwater is expected to remain within an existing area of contaminated groundwater[2] as defined by the

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(appropriate for the protection of the groundwater resource and its beneficial uses).

[2]"existing area of contaminated groundwater" is an area (with horizontal and vertical dimensions) that has

monitoring locations designated at the time of this determination)?

____ If yes - continue, after presenting or referencing the physical evidence (e.g., groundwater sampling/measurement/migration barrier data) and rationale why contaminated groundwater is expected to remain within the (horizontal or vertical) dimensions of the Aexisting area of groundwater contamination@[2]).

_____ If no (contaminated groundwater is observed or expected to migrate beyond the designated locations defining the Aexisting area of groundwater contamination@[2]) - skip to #8 and enter "NO" status code, after providing an explanation.

_____ If unknown - skip to #8 and enter "IN" status code.

Rationale:

References:

4. Does "contaminated" groundwater **discharge** into **surface water** bodies?

____ If yes - continue after identifying potentially affected surface water bodies.

____ If no - skip to #7 (and enter a "YE" status code in #8, if #7 = yes) after providing an explanation and/or referencing documentation supporting that groundwater "contaminated" does not enter surface water bodies.

_____ If unknown - skip to #8 and enter "IN" status code.

Rationale:

Type here

References:

Type here

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been verifiably demonstrated to contain all relevant groundwater contamination for this determination, and is defined by designated (monitoring) locations proximate to the outer perimeter of "contamination" that can and will be sampled/tested in the future to physically verify that all "contaminated" groundwater remains within this area, and that the further migration of "contaminated" groundwater is not occurring. Reasonable allowances in the proximity of the monitoring locations are permissible to incorporate formal remedy decisions (i.e., including public participation) allowing a limited area for natural attenuation.

5. Is the **discharge** of "contaminated" groundwater into surface water likely to be **"insignificant"** (i.e., the maximum concentration[3] of each contaminant discharging into surface water is less than 10 times their appropriate groundwater "level," and there are no other conditions (e.g., the nature, and number, of discharging contaminants, or environmental setting), which significantly increase the potential for unacceptable impacts to surface water, sediments, or eco-systems at these concentrations)?

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___ If yes - skip to #7 (and enter "YE" status code in #8 if #7 = yes), after documenting: 1) the maximum known or reasonably suspected concentration[3] of key contaminants discharged above their groundwater "level," the value of the appropriate "level(s)," and if there is evidence that the concentrations are increasing; and 2) provide a statement of professional judgement/explanation (or reference documentation) supporting that the discharge of groundwater contaminants into the surface water is not anticipated to have unacceptable impacts to the receiving surface water, sediments, or eco-system.

_____ If no - (the discharge of "contaminated" groundwater into surface water is potentially significant) - continue after documenting: 1) the maximum known or reasonably suspected concentration[3] of each contaminant discharged above its groundwater "level," the value of the appropriate "level(s)," and if there is evidence that the concentrations are increasing; and 2) for any contaminants discharging into surface water in concentrations[3] greater than 100 times their appropriate groundwater "levels," the estimated total amount (mass in kg/yr) of each of these contaminants that are being discharged (loaded) into the surface water body (at the time of the determination), and identify if there is evidence that the amount of discharging contaminants is increasing.

_____ If unknown - enter "IN" status code in #8.

Rationale:

Type here

References:

Type here

6. Can the **discharge** of "contaminated" groundwater into surface water be shown to be "**currently acceptable**" (i.e., not cause impacts to surface water, sediments or eco-systems that should not be

[3]As measured in groundwater prior to entry to the groundwater-surface water/sediment interaction (e.g., hyporheic) zone.

allowed to continue until a final remedy decision can be made and implemented[4])?

___ If yes - continue after either: 1) identifying the Final Remedy decision incorporating these conditions, or other site-specific criteria (developed for the protection of the site=s surface water, sediments, and eco-systems), and referencing supporting documentation demonstrating that these criteria are not exceeded by the discharging groundwater; OR
2) providing or referencing an interim-assessment,[5] appropriate to the potential for impact, that shows the discharge of groundwater contaminants into the surface water is (in the opinion of a trained specialists, including ecologist) adequately protective of receiving surface water, sediments, and eco-systems, until such time when a full assessment and final remedy decision can be made. Factors which should be considered in the interim-assessment (where appropriate to help identify the impact associated with discharging groundwater) include: surface water body size, flow, use/classification/habitats and contaminant loading limits, other sources of surface water/sediment contamination, surface water and sediment sample results and comparisons to available and appropriate surface water and sediment "levels," as well as any other factors, such as effects on ecological receptors (e.g., via bio-assays/benthic surveys or site-specific ecological Risk Assessments), that the overseeing regulatory agency would deem appropriate for making the EI determination.

_____ If no - (the discharge of "contaminated" groundwater can not be shown to be "**currently acceptable**") - skip to #8 and enter "NO" status code, after documenting the currently unacceptable impacts to the surface water body, sediments, and/or eco-systems.

_____ If unknown - skip to 8 and enter "IN" status code.

Rationale:

Type here

References:

Type here

[4]Note, because areas of inflowing groundwater can be critical habitats (e.g., nurseries or thermal refugia) for many species, appropriate specialist (e.g., ecologist) should be included in management decisions that could eliminate these areas by significantly altering or reversing groundwater flow pathways near surface water bodies.

[5]The understanding of the impacts of contaminated groundwater discharges into surface water bodies is a rapidly developing field and reviewers are encouraged to look to the latest guidance for the appropriate methods and scale of demonstration to be reasonably certain that discharges are not causing currently unacceptable impacts to the surface waters, sediments or eco-systems.

7. Will groundwater **monitoring** / measurement data (and surface water/sediment/ecological data, as necessary) be collected in the future to verify that contaminated groundwater has remained within the horizontal (or vertical, as necessary) dimensions of the existing area of contaminated groundwater?

    ____ If yes - continue after providing or citing documentation for planned activities or future sampling/measurement events. Specifically identify the well/measurement locations which will be tested in the future to verify the expectation (identified in #3) that groundwater contamination will not be migrating horizontally (or vertically, as necessary) beyond the "existing area of groundwater contamination."

    _____ If no - enter "NO" status code in #8.

    _____ If unknown - enter "IN" status code in #8.

Rationale:

Type here

8. Check the appropriate RCRAInfo status codes for the Migration of Contaminated Groundwater Under Control EI (event code CA750), and obtain Supervisor (or appropriate Manager) signature and date on the EI determination below (attach appropriate supporting documentation as well as a map of the facility).

    X YE - Yes, "Migration of Contaminated Groundwater Under Control" has been verified. Based on a review of the information contained in this EI determination, it has been determined that the "Migration of Contaminated Groundwater" is "Under Control" at the Industrial Environmental Systems, Inc Facility, EPA ID #NYD000707885, located at Old Kings Highway, Saugerties, New York. Specifically, this determination indicates that the migration of known or reasonably suspected to be "contaminated" groundwater is under control, and that monitoring will be conducted, as necessary, to confirm that contaminated groundwater remains within the "existing area of contaminated groundwater". This determination will be re-evaluated when the Agency becomes aware of significant changes at the facility.

    _____ NO - Unacceptable migration of contaminated groundwater is observed or expected.

    _____ IN - More information is needed to make a determination.

Completed by: _____ Date: April 1, 2014
Jamie Verrigni
Project Manager

Supervisor: _____ Date: April 1, 2014
James Candiloro – Acting Chief
Remedial Section A

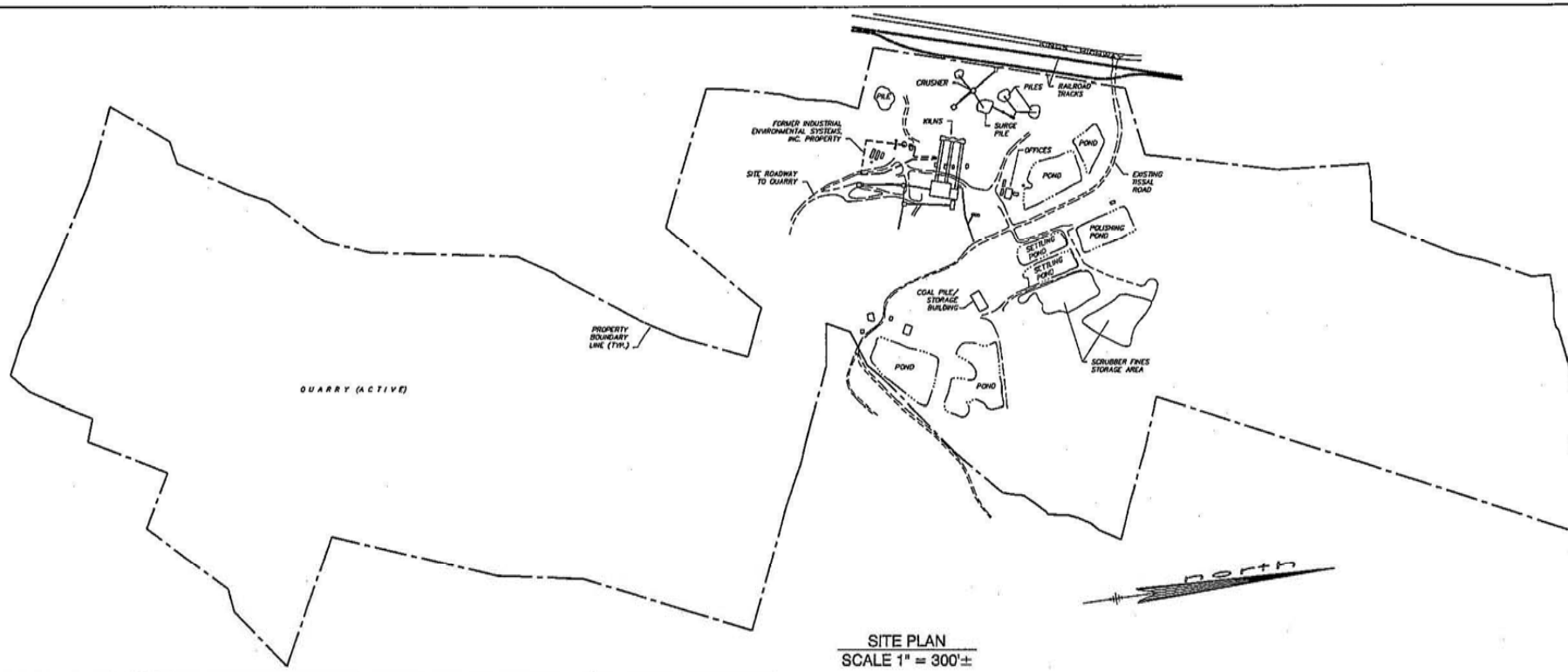
Director: _____ Date: April 1, 2014
George Heitzman
Director, Remedial Bureau C
Division of Environmental Remediation

Locations where References may be found:

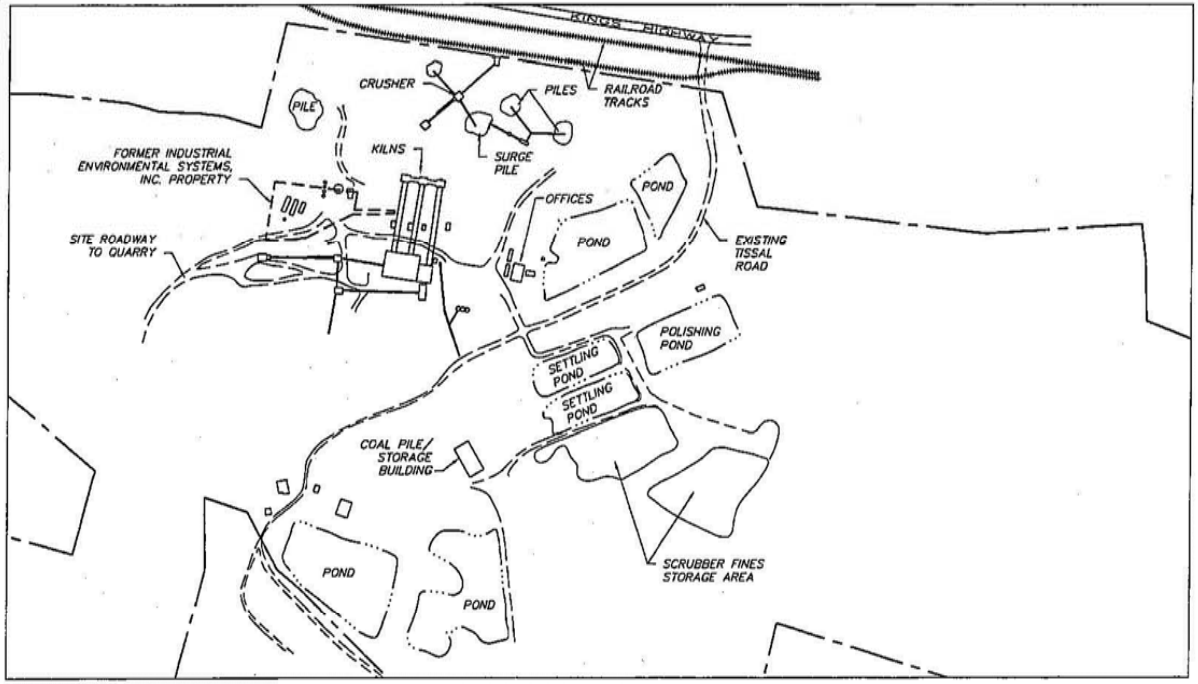
New York State Department of Environmental Conservation, Central Office
Division of Environmental Remediation
625 Broadway 11th Floor
Albany, New York 12233-7014

Contact, telephone number and e-mail:

Jamie Verrigni
(518) 402-9662
jlverrig@gw.dec.state.ny.us



SITE PLAN
SCALE 1" = 300'±



AREA OF INTEREST
SCALE 1" = 200'±

1" = 200'
200 0 100 200 400

1" = 300'
300 200 100 0 150 300 600

APPROXIMATE SCALES IN FEET

REVISIONS

NO.	DATE	DESCRIPTION

SITE PLAN

NORTHEAST SOLITE CORPORATION
FORMER INDUSTRIAL ENVIRONMEN
SERVICES INC. PROPERTY
MOUNT MARION, NEW YORK

HRP Associates, Inc.
Environmental/Civil Engineering & Hydrogeology
Creating the Right Solutions Together
Connecticut, New York, Massachusetts, Pennsylvania, South Carolina
100 Saratoga Blvd, Suite 27
Malta, New York 12020
(518) 899-3011
FAX: (518) 899-8129
www.hrpassociates.com

CBB	JRS	AS
DESIGNED	APPROVED	SCALE
B.O.B.	JUNE 4, 2003	
DRAWN	DATE	
CBB	NOR3700.P2	
CHECKED	PROJECT NO.	SHE

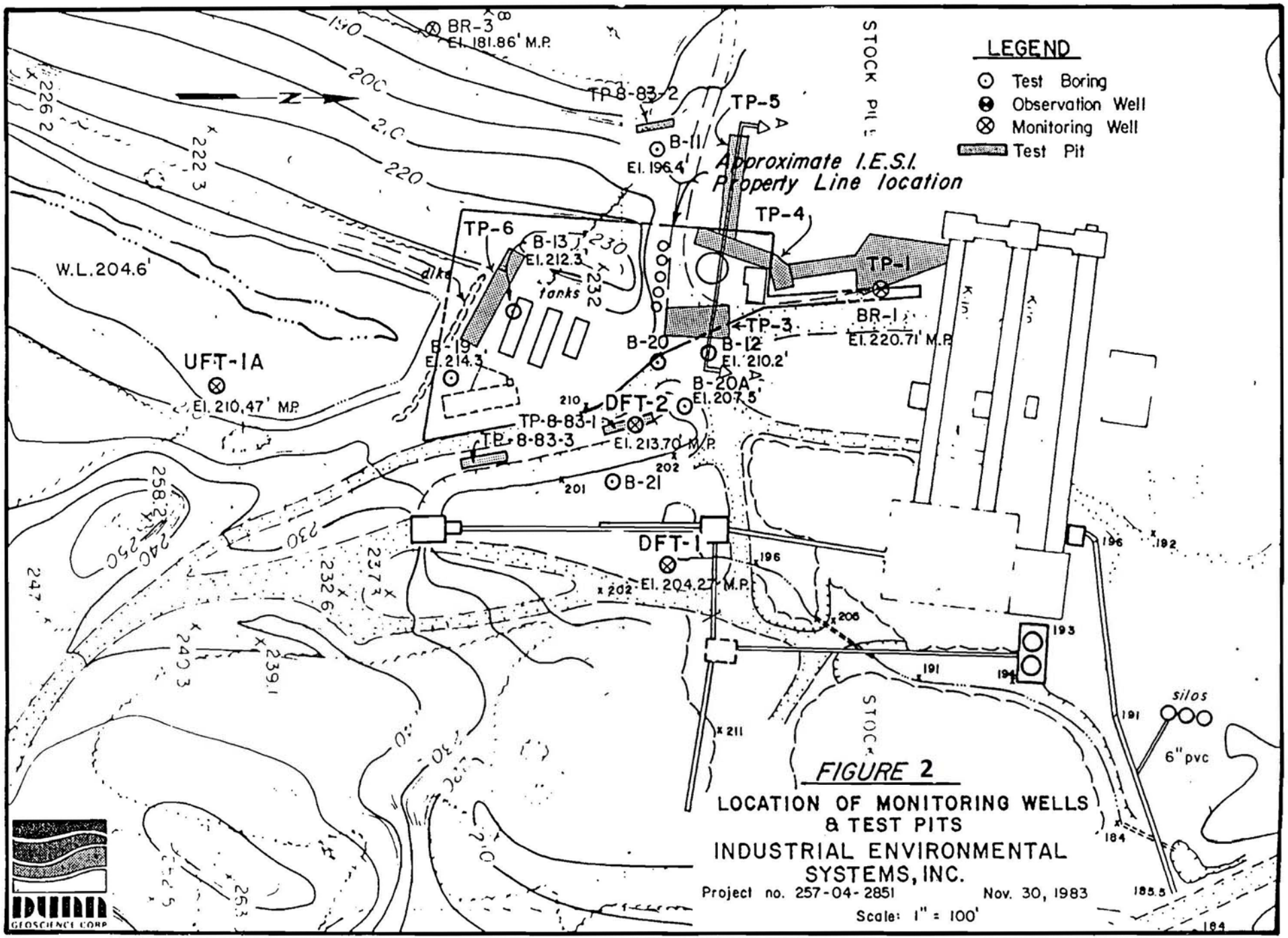


FIGURE 2

LOCATION OF MONITORING WELLS & TEST PITS

INDUSTRIAL ENVIRONMENTAL SYSTEMS, INC.

Project no. 257-04-2851 Nov. 30, 1983

Scale: 1" = 100'

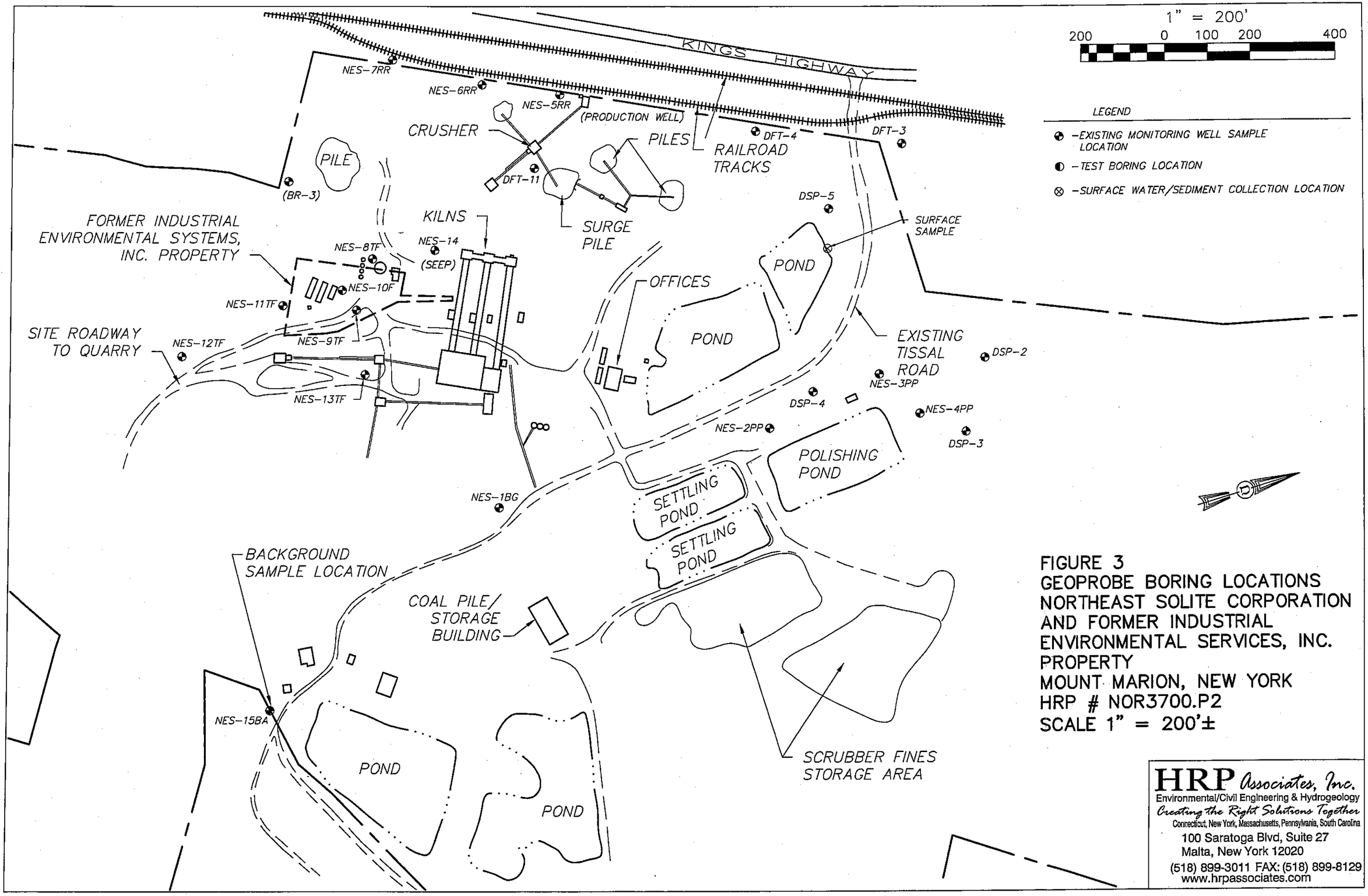


FIGURE 3
GEOPROBE BORING LOCATIONS
NORTHEAST SOLITE CORPORATION
AND FORMER INDUSTRIAL
ENVIRONMENTAL SERVICES, INC.
PROPERTY
MOUNT MARION, NEW YORK
HRP # NOR3700.P2
SCALE 1" = 200'±

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Table 1

SUMMARY OF HISTORICAL GROUNDWATER MONITORING DATA
FORMER INDUSTRIAL ENVIRONMENTAL SYSTEMS, INC. FACILITY
MOUNT MARION, NEW YORK
SEPTEMBER 1983 TO JUNE 1988

DFT-1

PARAMETERS	SEPT 1983	NOV-DEC 1983	JAN-FEB 1984	APRIL 1984	JUNE 1984	AUG 1984	NOV 1984	FEB 1985	APRIL 1985
ACETONE	--	--	--	--	--	--	--	--	-- / --
1-1-DICHLOROETHANE	1	3	--	8	18	16	B	18.7	4 / 5
TRANS-1,2-DICHLOROETHENE	--	--	--	--	--	--	--	--	-- / --
CHLOROFORM	--	--	--	--	--	--	--	--	-- / 3.1
METHYL ETHYL KETONE	--	35	--	--	--	--	--	--	-- / --
1,2-DICHLOROETHANE	4	12	9	15	18	31	11	B	15 / 11.5
1,1,1-TRICHLOROETHANE	--	--	--	2	4	B	--	--	4 / --
TRICHLOROETHENE	--	--	--	--	--	B	B	B	-- / --
1,1,2-TRICHLOROETHANE	--	--	--	3	--	B	B	--	3 / --
METHYL ISOBUTYL KETONE	--	25	--	--	--	--	--	--	-- / --
TETRACHLOROETHENE	--	--	--	--	--	B	B	--	-- / --
1,1,2,2-TETRACHLOROETHANE	--	2	--	--	--	--	--	--	-- / --
TOLUENE	--	--	--	--	--	14	--	--	-- / --
ETHYL BENZENE	--	--	--	--	--	--	--	--	-- / --
M-XYLENE	NA	NA	NA	NA	NA	NA	NA	NA	NA
O-XYLENE	NA	NA	NA	NA	NA	NA	NA	NA	NA
P-XYLENE	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL XYLENE	--	--	--	--	--	--	--	--	-- / --
TETRAHYDROFURAN	--	--	--	--	--	--	--	--	-- / --
ISOPROPYL ETHER	--	--	--	--	--	--	--	--	-- / --
METHYLENE CHLORIDE	--	--	--	--	--	--	--	4.8	-- / --
2-CHLOROETHYL-VINYL ETHER	--	--	--	--	--	--	--	--	-- / --
BENZENE	--	--	--	--	--	--	B	B	-- / --
CHLOROBENZENE	--	--	--	--	--	--	B	--	-- / --
1,2-DICHLOROPROPENE	--	--	--	--	--	--	--	--	-- / --
1,2-DICHLOROPROPANE	--	--	--	--	--	--	--	--	-- / --
CARBON TETRACHLORIDE	--	--	--	--	--	--	--	--	-- / 1.3
1,2-DICHLOROETHENE	--	--	--	--	--	--	--	B	-- / 1.1
TRICHLOROFLUOROMETHANE	--	--	--	--	--	--	--	--	-- / --
TRICHLOROFLUOROETHANE	--	--	--	--	--	--	--	--	-- / --
CHLOROMETHANE	--	--	--	--	--	--	--	--	-- / --
CHLOROETHANE	--	--	--	--	--	--	--	--	-- / --
1,1-DICHLOROETHENE	--	--	--	--	--	--	--	--	-- / --
DICHLOROBENZENES	--	--	--	--	--	--	--	--	-- / --
VINYL CHLORIDE	--	--	--	--	--	--	--	B	-- / --
1,2 DICHLOROBENZENE	--	--	--	--	--	--	--	--	-- / --
P,P' - DDE	0.03	--	0.04	--	--	--	--	--	-- / --
PCB 1242	--	--	--	--	--	--	--	--	-- / --
PCB 1260	--	--	--	--	--	--	--	--	-- / --

NA = Not Analyzed.
B = Originally reported as BMDL, outdated nomenclature (Below Method Detection Limit) signifying a qualitative detection less than the quantitation limit
Units in PPB
- GC/MS , GC

Table 1

SUMMARY OF HISTORICAL GROUNDWATER MONITORING DATA
FORMER INDUSTRIAL ENVIRONMENTAL SYSTEMS, INC. FACILITY
MOUNT MARION, NEW YORK
SEPTEMBER 1983 TO JUNE 1988

PARAMETERS	MAY 1985	AUG 1985	NOV 1985	JUNE 1988
ACETONE	– / –	– / --	-- / --	– // –
1-1-DICHLOROETHANE	8.8 / 5.3	6 / --	5.3 / 5.1	2.2 // 2.1
TRANS-1,2-DICHLOROETHENE	– / --	-- / --	-- / --	-- // --
CHLOROFORM	8 / --	-- / --	-- / --	-- // --
METHYL ETHYL KETONE	-- / --	– / --	-- / --	-- // --
1,2 DICHLOROETHANE	24.1 / 15	24 / 21	18 / 19.7	5.9 // 7.5
1,1,1-TRICHLOROETHANE	8 / 1.3	-- / --	-- / 1	-- // --
TRICHLOROETHENE	– / 13.5	-- / --	-- / --	-- // --
1,1,2-TRICHLOROETHANE	5.7 / --	-- / --	3.2 / --	-- // --
METHYL ISOBUTYL KETONE	-- / --	-- / --	-- / --	-- // --
TETRACHLOROETHENE	-- / --	-- / --	-- / --	-- // --
1,1,2,2-TETRACHLOROETHANE	-- / --	– / --	-- / --	-- // --
TOLUENE	-- / --	5 / --	-- / --	-- // --
ETHYL BENZENE	-- / --	-- / --	-- / --	-- // --
M-XYLENE	NA	NA	NA	-- // --
O XYLENE	NA	NA	NA	-- // --
P-XYLENE	NA	NA	NA	-- // --
TOTAL XYLENE	-- / --	-- / --	-- / --	-- // --
TETRAHYDROFURAN	-- / --	-- / --	-- / --	-- // --
ISOPROPYL ETHER	-- / --	-- / --	-- / --	-- // --
METHYLENE CHLORIDE	4.8 / --	-- / --	-- / --	-- // --
2-CHLOROETHYL-VINYL ETHER	-- / --	– / --	-- / --	-- // --
BENZENE	8 / --	2 / --	-- / --	-- // --
CHLOROBENZENE	-- / --	-- / --	-- / --	-- // --
1,2-DICHLOROPROPENE	-- / --	-- / --	-- / --	-- // --
1,2-DICHLOROPROPANE	-- / --	-- / --	-- / --	-- // --
CARBON TETRACHLORIDE	-- / --	-- / --	- / --	-- // --
1,2-DICHLOROETHENE	-- / 1.7	-- / 1.3	-- / 1.4	-- // --
TRICHLOROFLUOROMETHANE	-- / 3.3	-- / 2	-- / --	-- // --
TRICHLOROFLUOROETHANE	-- / --	-- / --	-- / --	-- // --
CHLOROMETHANE	-- / --	-- / --	-- / -	-- // --
CHLOROETHANE	-- / --	-- / --	-- / --	-- // --
1,1-DICHLOROETHENE	-- / --	-- / --	-- / --	-- // --
DICHLOROBENZENES	-- / --	-- / -	-- / --	-- // --
VINYL CHLORIDE	-- / --	-- / --	-- / --	-- // --
1,2 DICHLOROBENZENE	-- / --	-- /	-- / -- /	-- // --
P,P' - DDE	-- / --	-- / -	-- / -	-- // --
PCB 1242	-- / --	-- / --	- / --	-- // --
PCB 1260	-- / --	-- / --	-- / --	-- // --

x // y = Original // Duplicate.
NA = Not Analyzed.
B = Originally reported as BMDL, outdated nomenclature (Below Method Detection Limit) signifying a qualitative detection less than the quantitation limit.
Units in PPB
* GC/MS , GC

Table 1

SUMMARY OF HISTORICAL GROUNDWATER MONITORING DATA
FORMER INDUSTRIAL ENVIRONMENTAL SYSTEMS, INC. FACILITY
MOUNT MARION, NEW YORK
SEPTEMBER 1983 TO JUNE 1988

DFT-2

PARAMETERS	SEPT 1983	NOV-DEC 1983	JAN-FEB 1984	APRIL 1984	JUNE 1984
ACETONE	--	590		1400	--
1-1-DICHLOROETHANE	6	28		27	20
TRANS-1,2-DICHLOROETHENE	9	118		45	23
CHLOROFORM	13	--		150	93
METHYL ETHYL KETONE	--	450		400	--
1,2-DICHLOROETHANE	5	80		110	65
1,1,1-TRICHLOROETHANE	110	710		1100	690
TRICHLOROETHENE	4	36		180	85
1,1,2-TRICHLOROETHANE	--	19		11	7
METHYL ISOBUTYL KETONE	--	470		800	--
TETRACHLOROETHENE	20	170		290	130
1,1,2,2-TETRACHLOROETHANE	--	72		--	19
TOLUENE	--	500	D	1900	120
ETHYL BENZENE	--	--	R	--	--
M-XYLENE	NA	NA	Y	NA	NA
O-XYLENE	NA	NA		NA	NA
P-XYLENE	NA	NA		NA	NA
TOTAL XYLENE	--	580	W	1000	250
TETRAHYDROFURAN	--	--	E	--	--
ISOPROPYL ETHER	--	--	L	--	--
METHYLENE CHLORIDE	--	80	L	190	120
2-CHLOROETHYL-VINYL ETHER	--	--		--	--
BENZENE	--	46		94	26
CHLOROBENZENE	--	3		12	3
1,2-DICHLOROPROPENE	--	3		--	--
1,2-DICHLOROPROPANE	--	--		--	2
CARBON TETRACHLORIDE	--	--		--	--
1,2-DICHLOROETHENE	--	--		--	--
TRICHLOROFLUOROMETHANE	--	--		--	--
TRICHLOROFLUOROETHANE	--	--		--	--
CHLOROMETHANE	--	--		--	--
CHLOROETHANE	--	--		--	--
1,1-DICHLOROETHENE	--	--		--	--
DICHLOROBENZENES	--	--		--	--
VINYL CHLORIDE	--	--		--	--
1,2 DICHLOROBENZENE	--	--		--	--
				--	
P,P'- DDE	--	--		--	--
PCB 1242	--	--		--	--
PCB 1260	0.22	0.95		1.17	0.15

NA = Not Analyzed.
B = Originally reported as BMDL, outdated nomenclature (Below Method Detection Limit) signifying a qualitative detection less than the quantitation limit.
Units in PPB

Table 1

SUMMARY OF HISTORICAL GROUNDWATER MONITORING DATA
FORMER INDUSTRIAL ENVIRONMENTAL SYSTEMS, INC. FACILITY
MOUNT MARION, NEW YORK
SEPTEMBER 1983 TO JUNE 1988

	DFT- 4	DFT-6			DFT-6B	DFT-6C		DFT-7		DFT-9
PARAMETERS	MAY 1985	APRIL 1984	JUNE 1984	AUG 1984	AUG 1985	NOV 1985	JUNE 1988	MAY 1985	AUG 1985	APRIL 1984
ACETONE	--	--	--	--	--	--	--	--	--	--
1-1-DICHLOROETHANE	--	23	8	47	--	26.4	21	--	--	2
TRANS-1,2-DICHLOROETHENE	--	--	--	--	--	--	--	--	--	--
CHLOROFORM	--	--	--	--	--	--	--	--	--	3
METHYL ETHYL KETONE	--	--	--	--	--	--	--	--	--	--
1,2-DICHLOROETHANE	--	--	--	--	--	--	--	--	--	5
1,1,1-TRICHLOROETHANE	--	66	81	B	1.3	2.1	--	--	--	7
TRICHLOROETHENE	4.7	--	--	--	--	--	--	3.2	--	--
1,1,2-TRICHLOROETHANE	--	--	--	--	--	--	--	--	--	4
METHYL ISOBUTYL KETONE	--	--	--	--	--	--	--	--	--	--
TETRACHLOROETHENE	--	--	--	B	--	--	--	--	--	--
1,1,2,2-TETRACHLOROETHANE	--	--	--	--	--	--	--	--	--	3
TOLUENE	--	--	--	36	--	--	--	--	--	--
ETHYL BENZENE	--	--	--	--	--	--	--	--	--	--
M-XYLENE	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
O-XYLENE	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
P-XYLENE	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL XYLENE	--	--	--	--	--	--	--	--	--	--
TETRAHYDROFURAN	--	--	--	--	--	--	--	--	--	--
ISOPROPYL ETHER	--	--	--	--	--	--	--	--	--	--
METHYLENE CHLORIDE	--	--	--	--	--	--	--	--	1.2	--
2-CHLOROETHYL-VINYL ETHER	--	--	--	--	--	--	--	--	--	--
BENZENE	--	--	--	--	--	--	--	--	--	--
CHLOROBENZENE	--	--	--	--	1.8	--	--	--	--	--
1,2 DICHLOROPROPENE	--	--	--	--	--	--	--	--	--	--
1,2-DICHLOROPROPANE	--	--	--	--	--	--	--	--	--	--
CARBON TETRACHLORIDE	--	--	--	--	--	--	--	--	--	--
1,2-DICHLOROETHENE	--	--	--	--	--	--	--	--	--	--
TRICHLOROFLUOROMETHANE	--	--	--	--	--	--	--	--	--	--
TRICHLOROFLUOROETHANE	--	--	--	--	--	--	--	--	--	--
CHLOROMETHANE	--	--	--	--	1.2	--	--	--	--	--
CHLOROETHANE	--	--	--	--	--	2.5	--	--	--	--
1,1-DICHLOROETHENE	--	--	--	--	38	--	--	--	--	--
DICHLOROBENZENES	--	--	--	--	--	--	--	--	--	--
VINYL CHLORIDE	--	--	--	--	--	--	--	--	--	--
1,2-DICHLOROBENZENE	--	--	--	--	--	--	--	--	--	--
P,P'- DDE	--	--	--	--	--	--	--	--	--	--
PCB 1242	--	--	--	--	--	--	--	--	--	--
PCB 1260	--	--	--	--	--	--	--	--	--	--

NA = Not Analyzed.
B = Originally reported as BMDL, outdated nomenclature (Below Method Dectection Limit) signifying a qualitative detection less than the quantitation limit.
Units in PPB

Table 1

SUMMARY OF HISTORICAL GROUNDWATER MONITORING DATA
FORMER INDUSTRIAL ENVIRONMENTAL SYSTEMS, INC. FACILITY
MOUNT MARION, NEW YORK
SEPTEMBER 1983 TO JUNE 1988

	DFT-9 con't						DFT-10			DFT-11
PARAMETERS	JUNE 1984	AUG 1984	NOV 1984	APRIL 1985	MAY 1985	AUG 1985	AUG 1984	MAY 1985	AUG 1985	AUG 1984
ACETONE	--	--	--	--	--	--	--	--	--	--
1-1-DICHLOROETHANE	2	B	--	1	--	--	--	--	--	--
TRANS-1,2-DICHLOROETHENE	--	--	--	--	--	--	--	--	--	--
CHLOROFORM	--	--	--	--	--	--	--	--	--	--
METHYL ETHYL KETONE	--	--	--	--	--	--	--	--	--	--
1,2-DICHLOROETHANE	--	--	--	1.3	1.1	--	--	--	--	--
1,1,1-TRICHLOROETHANE	3	B	--	1.1	--	--	--	--	--	--
TRICHLOROETHENE	--	B	B	--	11.4	--	--	4.9	--	--
1,1,2-TRICHLOROETHANE	--	B	--	--	--	--	--	--	--	--
METHYL ISOBUTYL KETONE	--	--	--	--	--	--	--	--	--	--
TETRACHLOROETHENE	--	B	--	--	--	--	66	--	--	B
1,1,2,2-TETRACHLOROETHANE	2	--	--	--	--	--	--	--	--	--
TOLUENE	--	B	--	--	--	--	B	--	--	--
ETHYL BENZENE	--	--	--	--	--	--	--	--	--	--
M-XYLENE	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
O-XYLENE	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
P-XYLENE	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL XYLENE	--	--	--	--	--	--	--	--	--	--
TETRAHYDROFURAN	--	--	--	--	--	--	--	--	--	--
ISOPROPYL ETHER	--	--	--	--	--	--	--	--	--	--
METHYLENE CHLORIDE	--	--	--	--	--	--	--	--	--	--
2-CHLOROETHYL-VINYL ETHER	--	--	--	--	--	--	--	--	--	--
BENZENE	--	--	--	--	1.1	--	--	--	--	--
CHLOROBENZENE	--	--	--	--	--	--	--	--	--	--
1,2-DICHLOROPROPENE	--	--	--	--	--	--	--	--	--	--
1,2-DICHLOROPROPANE	--	--	--	--	--	--	--	--	--	--
CARBON TETRACHLORIDE	--	--	--	--	--	--	--	--	--	--
1,2-DICHLOROETHENE	--	--	--	--	1.4	1.3	--	--	--	--
TRICHLOROFLUOROMETHANE	--	--	--	--	--	--	--	--	--	--
TRICHLOROFLUOROETHANE	--	--	--	--	--	--	--	--	--	--
CHLOROMETHANE	--	--	--	--	--	--	--	--	--	--
CHLOROETHANE	--	--	--	--	--	--	--	--	--	--
1,1-DICHLOROETHENE	--	--	--	--	--	--	--	--	--	--
DICHLOROBENZENES	--	--	--	--	--	--	--	--	--	--
VINYL CHLORIDE	--	--	--	--	--	--	--	--	--	--
1,2 DICHLOROBENZENE	--	--		--	--	--	--	--	--	--
P,P'-DDE	--	--	--	--	--	--	--	--	--	--
PCB 1242	--	--		--	--	--	--	--	--	--
PCB 1260	--	--		--	--		--	--	--	--

NA = Not Analyzed.
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Units in PPB

Table 1

SUMMARY OF HISTORICAL GROUNDWATER MONITORING DATA
FORMER INDUSTRIAL ENVIRONMENTAL SYSTEMS, INC. FACILITY
MOUNT MARION, NEW YORK
SEPTEMBER 1983 TO JUNE 1988

	DFT-11A	DITCH		
PARAMETERS	**MAY 1985**	**JUNE 1984**	**AUG 1984**	**NOV 1984**
ACETONE	--	--	--	--
1-1-DICHLOROETHANE	--	--	--	--
TRANS-1,2-DICHLOROETHENE	--	--	--	--
CHLOROFORM	--	--	--	--
METHYL ETHYL KETONE	--	--	--	--
1,2-DICHLOROETHANE	--	--	--	--
1,1,1-TRICHLOROETHANE	--	2	--	--
TRICHLOROETHENE	1.8	--	--	--
1,1,2-TRICHLOROETHANE	--	--	--	--
METHYL ISOBUTYL KETONE	--	--	--	--
TETRACHLOROETHENE	--	--	22	--
1,1,2,2-TETRACHLOROETHANE	--	--	--	--
TOLUENE	--	--	--	--
ETHYL BENZENE	--	--	--	--
M-XYLENE	NA	NA	NA	NA
O-XYLENE	NA	NA	NA	NA
P-XYLENE	NA	NA	NA	NA
TOTAL XYLENE	--	--	--	--
TETRAHYDROFURAN	--	--	--	--
ISOPROPYL ETHER	--	--	--	--
METHYLENE CHLORIDE	--	--	--	B
2-CHLOROETHYL-VINYL ETHER	--	--	--	--
BENZENE	--	--	--	--
CHLOROBENZENE	--	--	--	--
1,2-DICHLOROPROPENE	--	--	--	--
1,2-DICHLOROPROPANE	--	--	--	--
CARBON TETRACHLORIDE	--	--	--	--
1,2-DICHLOROETHENE	1.2	--	--	--
TRICHLOROFLUOROMETHANE	--	--	--	--
TRICHLOROFLUOROETHANE	--	--	--	--
CHLOROMETHANE	--	--	--	--
CHLOROETHANE	--	--	--	--
1,1-DICHLOROETHENE	--	--	--	--
DICHLOROBENZENES	--	--	--	--
VINYL CHLORIDE	--	--	--	--
1,2 DICHLOROBENZENE	--	--	--	--
P,P' - DDE	--	--	--	--
PCB 1242	--	--	--	--
PCB 1260	--	--	--	--

NA = Not Analyzed.
B = Originally reported as BMDL, outdated nomenclature (Below Method Dectection Limit) signifying a qualitative detection less than the quantitation limit.
Units in PPB

Table 1

SUMMARY OF HISTORICAL GROUNDWATER MONITORING DATA
FORMER INDUSTRIAL ENVIRONMENTAL SYSTEMS, INC. FACILITY
MOUNT MARION, NEW YORK
SEPTEMBER 1983 TO JUNE 1988

	BR-1	BR-2	BR-3						BR-4	
PARAMETERS	NOV 1984	NOV 1984	AUG 1984	NOV 1984	APRIL 1985	MAY 1985	AUG 1985	NOV 1985	APRIL 1984	AUG 1984
ACETONE	--	--	--	--	--	--	--	--	--	--
1-1-DICHLOROETHANE	--	--	--	--	2.1	3.9	--	7.4	--	--
TRANS-1,2-DICHLOROETHENE	--	--	--	--	--	--	--	--	--	--
CHLOROFORM	--	--	--	--	--	--	--	--	2	--
METHYL ETHYL KETONE	--	--	--	--	--	--	--	--	--	--
1,2-DICHLOROETHANE	--	--	--	--	2.1	--	5.7	--	--	--
1,1,1-TRICHLOROETHANE	--	--	--	--	1.1	--	1.7	1.7	--	--
TRICHLOROETHENE	--	--	--	--	--	3.8	--	--	--	--
1,1,2-TRICHLOROETHANE	--	--	--	--	--	--	--	--	--	--
METHYL ISOBUTYL KETONE	--	--	--	--	--	--	--	--	--	--
TETRACHLOROETHENE	--	B	11	--	--	--	--	--	--	--
1,1,2,2-TETRACHLOROETHANE	--	--	--	--	--	--	--	--	--	--
TOLUENE	--	B	B	--	--	--	--	--	--	--
ETHYL BENZENE	--	--	--	--	--	--	--	--	--	--
M-XYLENE	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
O-XYLENE	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
P-XYLENE	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL XYLENE	--	--	--	--	--	--	--	--	--	--
TETRAHYDROFURAN	--	--	--	--	--	--	--	--	--	--
ISOPROPYL ETHER	--	--	--	--	--	--	--	--	--	--
METHYLENE CHLORIDE	B	--	--	--	--	--	--	--	--	B
2-CHLOROETHYL-VINYL ETHER	--	--	--	--	--	--	--	--	--	--
BENZENE	--	--	--	--	--	--	--	--	--	--
CHLOROBENZENE	--	--	--	--	--	--	--	--	--	--
1,2-DICHLOROPROPENE	--	--	--	--	--	--	--	--	--	--
1,2-DICHLOROPROPANE	--	--	--	--	--	--	--	--	--	--
CARBON TETRACHLORIDE	--	--	--	--	1.1	--	--	--	--	--
1,2-DICHLOROETHENE	--	--	--	--	--	--	--	--	--	--
TRICHLOROFLUOROMETHANE	--	--	--	--	--	--	--	--	--	--
TRICHLOROFLUOROETHANE	--	--	--	B	--	--	--	--	--	--
CHLOROMETHANE	--	--	--	--	--	--	--	--	--	--
CHLOROETHANE	--	--	--	--	--	--	--	--	--	--
1,1-DICHLOROETHENE	--	--	--	--	--	--	--	--	--	--
DICHLOROBENZENES	--	--	--	--	--	--	--	--	--	--
VINYL CHLORIDE	--	--	--	--	--	--	--	--	--	--
1,2-DICHLOROBENZENE	--	--	--	--	--	--	--	--	--	--
P,P'-DDE	--	--	--	--	--	--	--	--	--	--
PCB 1242	--	--	--	--	--	--	--	--	--	--
PCB 1260	--	--	--	--	--	--	--	--	--	--

NA = Not Analyzed.
B = Originally reported as BMDL, outdated nomenclature (Below Method Detection Limit) signifying a qualitative detection less than the quantitation limit.
Units In PPB

TABLE 2
Summary of Groundwater Sample Results-RCRA Metals
Northeast Solite Corporation
Mount Marion, New York

Groundwater Sample ID	RCRA Metal (Atomic symbol in parentheses)							
	Arsenic (As)	Barium (Ba)	Cadmium (Cd)	Chromium (Cr)	Lead (Pb)	Mercury (Hg)	Selenium (Se)	Silver (Ag)
DFT-3	3.7R	75.6	0.5UJ	2.3UJ	2.7UJ	0.1U	3.8R	2.8U
DSP-2-2	3.7R	28.1	0.5UJ	2.3UJ	3.6J	0.1U	3.8R	2.8U
DSP-2-4	3.7R	214	0.65BJ	7.0BJ	2.7UJ	0.1U	3.8R	2.8U
DSP-3	3.7R	43.2B	6.1J	2.3UJ	22.4J	0.1U	11.6R	2.8U
DSP-4	3.7R	53.8B	2.8BJ	2.3UJ	9.9J	0.1U	3.8R	2.8U
DSP-5	3.7U	527	0.50U	2.3U	7.6	0.13B	3.8UJ	2.8U
NES-5RR	3.7R	159B	**43.8J**	**53.2**	**57.9J**	0.1U	3.8R	2.8U
NES-6RR	3.7R	174B	0.5UJ	2.3UJ	2.7UJ	0.1U	3.8R	2.8U
NES-7RR	3.7R	91.0B	0.91BJ	36.4J	**27.4J**	0.1U	3.8R	2.8U
NES-13TF	3.7R	134B	0.5UJ	15.4J	3.8J	0.1U	3.8R	2.8U
NES-15BA	3.7R	391	0.5UJ	6.6BJ	19.5J	0.1U	3.8R	2.8U
NYSDEC Groundwater Quality Standard*	25	1,000	10	50	25	2	10	50

All results reported in µg/l (ppb)
u-undetected at the MDL
j-detected below quantitation limit
uj-undetected with trace amount
*Derived from Article 17 of the Environmental Conservation Law and 6 NYCRR Parts 700-705, Water Quality Regulations

TABLE 3
Summary of Groundwater Sample Results-VOCs
Northeast Solite Corporation
Mount Marion, New York

Groundwater Sample ID	Volatile Organic Compound							
	Vinyl Chloride	Methylene Chloride	Acetone	trans-1,2-Dichloroethene	Trichloroethene	Tetrachlorethene	Toluene	cis-1, 2-Dichloroethene
BR-3	10U	5U	10U	5U	5U	5U	5U	5U
DFT-3	10U	5U	10U	5U	5U	5U	5U	5U
DFT-4	10U	5U	10U	5U	5U	5U	5U	5U
DFT-11	10U	5U	10U	5U	5U	5U	5U	5U
DSP-2-2	10U	5U	10U	5U	5U	5U	5U	5U
DSP-2-4	10U	5U	10U	5U	5U	5U	5U	5U
DSP-3	10U	5U	10U	5U	5U	5U	5U	5U
DSP-4	10U	5U	10U	5U	5U	5U	5U	5U
DSP-5	10UJ	5UJ	10UJ	5UJ	5UJ	5UJ	5UJ	5UJ
NES-5RR	10U	5U	10U	5U	5U	5U	5U	5U
NES-6RR	10U	5U	10U	5U	5U	5U	5U	5U
NES-7RR	10U	5U	10U	5U	5U	5U	5U	5U
NES-13TF	10U	5U	10U	5U	5U	5U	5U	5U
NES-15BA	10U	5U	10U	5U	5U	5U	5U	5U
Production Well	10U	5U	10U	5U	5U	5U	5U	5U
Seep	10UJ	5U	10U	5U	5U	5U	5U	5U
NYSDEC Groundwater Quality Standard*	5	5	5	5	5	5	5	5

All results reported in µg/l (ppb)
u-undetected at the MDL
j-detected below quantitation limit
uj-undetected with trace amount
*-*Derived from Article 17 of the Environmental Conservation Law and 6 NYCRR Parts 700-705, Water Quality Regulations

TABLE 4
Summary of Groundwater/Surface Water Sample Results-Semi-VOCs
Northeast Solite Corporation
Mount Marion, New York

Groundwater Sample ID	Semi-volatile Organic Compound								
	Phenol	Fluorene	4-Nitroaniline	Phenanthrene	Anthracene	Fluoranthene	Pyrene	Di-n-butylphthalate	Bis (2-Ethylhexyl) phthalate
BR-3	5U	5U	25U	5U	5U	5U	5U	2J	5U
DFT-3	5U	5U	25U	5U	5U	5U	5UJ	5U	5U
DFT-4	5UJ	5U	25U	5U	5U	5U	5UJ	2J	5U
DFT-11	5U	5U	25U	5U	5U	5U	5UJ	5U	5U
DSP-2-2	5U	5U	27U	5U	5U	5U	5UJ	1J	5U
DSP-2-4	5U	5U	3J	5U	5U	5U	5UJ	2J	5U
DSP-3	5UJ	5U	25U	5U	5U	5U	5U	5U	5U
DSP-4	5UJ	5U	25U	5U	5U	5U	5U	5U	5U
DSP-5	5UJ	5UJ	26UJ	5UJ	5UJ	5UJ	5UJ	5UJ	5UJ
NES-5RR	5U	5U	25U	5U	5U	5U	5U	5U	5U
NES-6RR	5U	5U	25U	5U	5U	5U	5U	5U	5U
NES-7RR	5U	5U	25U	5U	5U	5U	5U	5U	5U
NES-13TF	5U	5U	25U	5U	5U	5U	5U	5U	6U
NES-15BA	5U	5U	25U	5U	5U	5U	5U	5U	5U
Production Well	5U	5U	25U	5U	5U	5U	5U	5U	5U
Seep	5U	5U	25U	5U	5U	5U	5U	5U	6U
NYSDEC Groundwater Quality Standard*	1	50	5	50	50	50	50	50	50

All results reported in µg/l (PPB)
u-undetected at the MDL
j-detected below quantitation limit
uj-undetected with trace amount
* Derived from Article 17 of the Environmental Conservation Law and 6 NYCRR Parts 700-705, Water Quality Regulations

TABLE 5
Summary of Groundwater Sample Results-Polychlorinated Biphenyls (PCBs)
Northeast Solite Corporation
Mount Marion, New York

Groundwater Sample ID	Arochlor						
	1016	1221	1232	1242	1248	1254	1260
BR-3	0.062U	0.062U	0.062U	0.062U	0.062U	0.062U	0.062U
DFT-3	0.065U	0.065U	0.065U	0.065U	0.065U	0.065U	0.041J
DFT-4	0.062U	0.062U	0.062U	0.062U	0.062U	0.062U	0.062U
DFT-11	0.062U	0.062U	0.062U	0.062U	0.062U	0.062U	0.062U
DSP-2-2	0.062U	0.062U	0.062U	0.062U	0.062U	0.062U	0.062U
DSP-2-4	0.062U	0.062U	0.062U	0.062U	0.062U	0.062U	0.062U
DSP-3	0.065U	0.065U	0.065U	0.065U	0.065U	0.065U	0.065U
DSP-4	0.062U	0.062U	0.062U	0.062U	0.062U	0.062U	0.062U
DSP-5	0.062UJ	0.062UJ	0.062UJ	0.062UJ	0.062UJ	0.062UJ	0.062UJ
NES-5RR	0.062U	0.062U	0.062U	0.062U	0.062U	0.062U	0.062U
NES-6RR	0.062U	0.062U	0.062U	0.062U	0.062U	0.062U	**0.13**
NES-7RR	0.062U	0.062U	0.062U	0.062U	0.062U	0.062U	0.025J
NES-13TF	0.062U	0.062U	0.062U	0.062U	0.062U	0.062U	0.062U
NES-15BA	0.062U	0.062U	0.062U	0.062U	0.062U	0.062U	0.062U
Production Well	0.062U	0.062U	0.062U	0.062U	0.062U	0.062U	0.062U
Seep	0.062U	0.062U	0.062U	0.062U	0.062U	0.062U	0.074
Surface Water	0.065U	0.065U	0.065U	0.065U	0.065U	0.065U	0.065U
NYSDEC Groundwater Quality Standard*	0.1	0.1	0.1	0.1	0.1	0.1	0.1

All results reported in mg/kg (PPM)
u-undetected at the MDL
j-detected below quantitation limit
uj-undetected with trace amount
*Derived from Article 17 of the Environmental Conservation Law and 6 NYCRR Parts 700-705, Water Quality Regulations