DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION

RCRA Corrective Action
Environmental Indicator (EI) RCRAInfo code (CA725)
Current Human Exposures Under Control

Facility Name: **Stauffer Management Co. - Skaneateles Falls**
Facility Address: **4512 Jordan Road, Skaneateles, New York**
Facility EPA ID #: **NYD004859955**

BACKGROUND

Definition of Environmental Indicators (for the RCRA Corrective Action)

Environmental Indicators (EIs) 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 EIs 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 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 soil, groundwater, surface water/sediments, and air, 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 are not available skip to #6 and enter"IN" (more information needed) status code.

Background

The Stauffer Management Company (SMC) Skaneateles Falls Site is located in central New York State in the Town of Skaneateles Falls, Onondaga County. The property is located at 4512 Jordan Road, approximately three miles north of Skaneateles Lake and approximately twenty miles west of the city of Syracuse. The SMC Skaneateles Falls Site encompasses an area of approximately 120 acres. The property is divided into two unequal portions by the Skaneateles Creek. The SMC Skaneateles Falls site is bounded to the west by a mix of residential and commercial property. The north, east, and south areas of the site are primarily bounded by undeveloped property.

The SMC production facility and former landfill are located on the western side of the property and cover an area of approximately 20 acres. The facility was formerly used to manufacture potassium and sodium silicates, detergents, and organic intermediates from other industries. The principle organic compound manufactured at the site was toluic acid, which used xylene as a raw material. Currently there are no manufacturing activities conducted at the site.

The facility was built in the mid 1920's by Draycott Mills to manufacture felt roofing materials. Cowles Chemical Company bought the property in the mid 1940's and manufactured potassium and sodium silicates and industrial detergents. Organic compounds were manufactured at the facility from the late 1950s to 1981. Stauffer Chemical Company (now SMC) purchased the facility in the late 1960s and continued operations until 1985.

On-site disposal areas include the landfill, former inorganic settling basins, closed sludge disposal area, and the sanitary sewage leach field. Of the four on-site disposal areas, only the existing landfill is considered an AEC (Area of Environmental Concern). The landfill, located east of the main production building, was used for the disposal of process hazardous wastes such as silicate sludge and general plant refuse. The sludge disposal area, located east of the landfill, received excavated solids from the former settling basins. Only the sanitary leach field currently receives solid waste.

2. Are groundwater, soil, surface water, sediments, or air **media** known or reasonably suspected to be **"contaminated"**[1] 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	X	___	___	_____

[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 appropriately protective risk-based "levels" (for the media, that identify risks within the acceptable risk range).

Air (indoors)[2]	X	___	___	_____
Surface Soil (e.g., <2 ft)	X	___	___	_____
Surface Water	X	___	___	_____
Sediment	X	___	___	_____
Subsurf. Soil (e.g., >2 ft)	X	___	___	_____
Air (outdoors)	___	___	___	See discussion below and figures.

_____ If no (for all media) - skip to #6, and enter "YE," status code after providing or citing appropriate "levels," and referencing sufficient supporting documentation demonstrating that these "levels" are not exceeded.

__X__ If yes (for any media) - continue after identifying key contaminants in each "contaminated" medium, citing appropriate "levels" (or provide an explanation for the determination that the medium could pose an unacceptable risk), and referencing supporting documentation.

_____ If unknown (for any media) - skip to #6 and enter "IN" status code.

Rationale:

Site investigations were initiated at the site beginning in 1986 following observations of leachate seeps emanating from the northwest corner of the landfill and within the basement of the production building. An Order of Consent between the New York State Department of Environmental Conservation (NYSDEC or Department) and SMC was executed on March 28, 1991. This Order required completion of a Remedial Investigation and Feasibility Study (RI/FS) to establish site conditions and evaluate options for remediation of any identified contamination. Table 1 (attached) provides a summary of the Areas of Environmental Concern (AEC), key contaminants, and impacted media identified during the RI.

A Record of Decision (ROD) was executed on March 28, 1996. According to the ROD, the Existing Landfill (AEC-1) and the North Plant Area (AEC-2) are the primary sources of contamination at the site, including contaminants detected in overburden and bedrock groundwater in the vicinity of the site. The 1996 ROD called for excavation of the landfill area (AEC-1), the North Plant Area (AEC-2), and Skaneateles Creek sediments (AEC-5). Contaminated soil and wastes were to be disposed and treated in a permanent, onsite treatment and containment cell (Corrective Action Management Unit, or CAMU, cell). Included in the 1996 ROD remedy was extraction of contaminated groundwater from overburden and shallow bedrock beneath the site (AEC-3), followed by treatment in an on-site facility. The ROD also provided for the continued monitoring of the deep groundwater aquifer (AEC-4).

After the ROD was issued, the Department and Stauffer entered into a legal order for designing and implementing the selected remedy. An Order on Consent was signed in March 1997 and then Stauffer began the remedial design. Stauffer's design was approved by the Department in December 1998. The wastewater

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[2]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.

treatment facility was constructed and became operational in 1999 and is currently operating under a State Pollution Discharge Elimination System (SPDES) Permit with the NYSDEC Division of Water.

In 2000, Stauffer approached the Department and proposed to re-evaluate off-site disposal in lieu of on-site treatment and disposal in the CAMU cell. An off-site disposal option was originally evaluated in Stauffer's 1995 Feasibility Study and rejected, mainly due to cost considerations. However, because costs for off-site disposal dropped significantly after the 1996 ROD was approved, the Department agreed to amend the ROD and allow for off-site disposal based on a revised FS submitted by SMC. The amended ROD was executed on December 6, 2001 and included an amended remedy based on three newly-identified areas of concern located on the west side of Skaneateles Creek. These include the Main Plant Building (AEC-6), the area in front of the Main Plant Building (AEC-7), and the south plant area (AEC-8). The amended remedy called for the excavation of contaminated soils and wastes from these AECs and from additional locations within AEC-1 and AEC-2. In addition, the amended remedy called for the excavated soil to be disposed off-site instead of treated on-site. In 2006, the sample results from a Supplemental Investigation illustrated that Lagoon 1, east of AEC-1, was heavily contaminated with xylene and toluic acid and other areas on site require remediation.

Groundwater: Groundwater monitoring wells on-site were sampled during the RI in 1992 and 1993. Figure 1 (attached) shows the locations of monitoring wells and piezometers associated with the site. The wells were located on-site and several produced samples that indicated concentrations of vinyl chloride, 1,2 dichloroethene, benzene, toluene, ethylbenzene, xylene, toluic acid, phenolics, and polycyclic aromatic hydrocarbons (PAHs) at levels approaching or exceeding NYSDEC groundwater Class GA standards. Several of the wells produced samples that displayed an increase in contamination between the first and second sampling events. For example, monitoring well MW-7S showed an increase of 1,2 dichloroethene from 18 to 85 ug/L with the NYSDEC standard being 5 ug/L. MW-6S showed an increase in total PAHs from 17 to 136.5 between the two sampling events. MW-5I showed an apparent increase in xylenes from 110 to 430 ug/L between rounds 1 and 2 and monitoring well MW-12I, located between MW-5I and the facility boundary, indicates a xylenes concentration of 1,700 ug/L during the second sampling event. MW-1I indicated an increase in xylenes from 8 to 290 ug/L and an increase in phenols from 60 to 2,400 ug/L.

Toluic acid concentrations in monitoring well MW-7I increased between the first and second sampling rounds reported in the RI. Monitoring well MW16I, located off-site and downgradient of MW-7I, also indicated significant levels of toluic acid during the second round of groundwater sampling. Although there were increases in concentration between the first and second round of sampling during the RI/FS, the RI/FS report stated that the increase could have been due to drought conditions during the second round of sampling.

Inorganic analytes such as antimony, arsenic, chromium, cobalt, copper, lead, manganese, nickel, and vanadium, among others, were also detected at concentrations exceeding NYSDEC groundwater standards. Analytical results from monitoring wells sampled in 1999 were presented in the Results of Additional Site Assessment Activities report (IT Corp., 1999). These results also show levels of arsenic, chromium, and lead at concentrations exceeding NYSDEC groundwater standards. At the time, the observed distribution and concentrations of inorganic constituents in the groundwater at the facility indicated that the horizontal and possibly the vertical extent of contamination were not adequately delineated. This is still the case.

In January 2002, groundwater samples from three off-site bedrock monitoring wells (MW-16I, MW-16D, MW-19D) and three private wells (PW–06, PW-15, PW-19) located southwest and northwest of the facility were collected. Low levels of semi-volatile organic compounds (SVOCs) were detected in MW-16I, MW-16D, and PW-19. Low levels of volatile organic analytes (VOAs) were detected in samples from MW-16I and MW-16D. An estimated concentration of acetone was detected in the field blank and also in MW-16I, MW-16D and MW-19D results. The acetone was probably a laboratory artifact (EA, January 2002). The Site Plan included in the August 1997 Predesign Hydrogeologic Investigation Report (OBG, 1997) depicts on-site well

locations. Off-site well locations are shown on Figure 1. The primary facility volatile and semi-volatile site-specific contaminants of concern (xylene, toluene and toluic acid) have not been detected off-site at concentrations above the NYSDEC groundwater standards, with the exception of MW-16I, which showed relatively constant concentrations of these contaminants of concern.

Table 2 (attached) provides a summary of the Groundwater Maximum Detected Concentrations and Comparisons to NYSDEC Ambient Water Quality Standards (Class GA) obtained in 1999 (pre-remediation). Table 3 (attached) provides a list of the contaminants of concern for the off-site investigation. Table 4 (attached) provides the July 2007 quarterly sample results from Off-site Groundwater Monitoring and Private Wells. Table 5 (attached) provides the data summary of contaminants found during off-site groundwater sampling. Since five (5) rounds of quarterly sampling have not detected contaminants of concern, the frequency of sampling these off-site wells will be reduced.

As for the extent of contamination issue, a Supplemental Investigation completed in 2006 has provided additional information on groundwater contamination on site. In addition, groundwater quality continues to improve on site as more of the source area is removed (approx. 50,000 tons in 2007).

Soil: During the Remedial Investigation, contamination associated with the Existing Landfill (AEC-1) and the North Plant Area (AEC-2) was identified. Samples of landfill waste showed xylene concentrations ranging from non-detect to 25,000 parts per million (ppm), with an average of 2,700 ppm and toluic acid concentration ranging from non-detect to 8,500 ppm, with an average of 500 ppm.

Further site field investigations were completed in 1997 by SMC's consultants at the time, O'Brien & Gere Engineers (OBG), and by IT Corporation (IT) during the construction phase of the groundwater treatment system in January 1999. The work completed by OBG during design activities consisted of the installation of 11 soil borings and the excavation of 73 test pits. The results of the soil sampling showed xylene concentrations up to 140 ppm. The work completed by IT Corporation consisted of installing 31 test pits across the property and 13 monitoring wells, and collecting samples for laboratory analysis. As a result of this work, the limits of contamination in AEC-1 and AEC-2 were found to be larger than originally delineated in the RI. Additional potential source areas requiring treatment were identified in front of the former Main Plant Building (AEC-7) and near the location of some former underground storage tanks (AEC-8). Demolition of the former Main Plant Building itself (AEC-6) was also included in the amended remedy. As an IRM, Lagoon 1 immediately east of AEC-1 is being removed in Summer 2007. The completion of this IRM is tentatively scheduled for November 2007. Phase II, Spring 2008 planned investigation start, of the 2006 Supplemental Investigation will identify and determine the extent of contamination left behind. It is hoped that the Responsible Party (RP) will remediate all on-site sources of contamination identified during these Supplemental investigations.

Sediment: During the RI/FS, organic and inorganic chemicals were also identified in the sediments of Skaneateles Creek (AEC-5). A detailed investigation of contaminants in the creek sediments was conducted in December 2004 and January 2005. The results showed the presence of organic and inorganic constituents on-site and downstream off-site exceeding NYSDEC LEL (low effect level) and SEL (severe effect level) sediment screening criteria. Most of the contaminated sediments are located on-site. The only impacted area off-site was the "mill pond" (approximately 500 feet downstream from the facility). When the remaining creek contamination is removed in 2008, the 'mill pond' will be retested to confirm the belief that it was not re-contaminated after the creek's insufficient on-site remediation in 2005. The creek's sediment investigation has also determined the degree of bioavailability in sediments in the creek bottom.

Surface water: Two rounds of creek water sampling conducted during the RI showed that the surface water was free of VOAs and semi-VOCs at the time of sampling. Similarly, the inorganic results showed no current

significant effects from the site on the water quality of the stream. However, exceedances of the NYSDEC SPDES permit have been identified for polychlorinated biphenyls (PCBs) at outfalls 001 and 003 on a couple of occasions. In 2003, outfall 001 was plugged and eliminated as part of the main building demolition. Discharges to the creek from the plant outfalls are monitored under the SPDES permit.

Air (indoor): In the past, VOAs (predominantly xylene) were detected in groundwater which had migrated into the basement of the former Main Plant Building from the area near the former Organics Plant (AEC-2). The Main Plant Building was demolished in 2003, therefore on-site indoor air is not currently an issue. The potential for residential exposure to contaminants volatilizing from contaminated groundwater that migrates off-site is currently being evaluated by the NYSDEC. VOA sources in off-site groundwater have been removed and/or eliminated and the soil vapor intrusion evaluation was completed in August 2006 (no further action necessary), it is believed that the pathway for residents to breathe contaminants volatilizing from groundwater no longer exists.

References:

1. O'Brien & Gere Engineers, Inc., Pre-Design Hydrogeologic Investigation Report, August 1997.
2. IT Corporation, Results of Additional Site Assessment Activities, February 1999.
3. SPEC Consulting LLC, Final Focused Feasibility Study For Off-Site Disposal, May 2001.
4. EA Engineering, Science and Technology, Final Remedial Investigation Report, August 1994.
5. EA Engineering, Science and Technology, Final Groundwater Monitoring Report, April 2002.
6. SMC LLC, Groundwater Monitoring Report, February 2005 Report.

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

	Potential **Human Receptors** (Under Current Conditions)						
"Contaminated" Media	Residents	Workers	Day-Care	Construction	Trespassers	Recreation	Food[3]
Groundwater	No	No	No	No	No	No	No
Air (indoors)	No	No	No	No	No	No	No
Soil (surface, e.g., <2 ft)	No	No	No	No	No	No	No
Surface Water	No	No	No	No	No	No	No
Sediment	No	No	No	No	No	No	No
Soil (subsurface e.g., >2 ft)	No	No	No	No	No	No	No
Air (outdoors)	No	No	No	No	No	No	No

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

[3] Indirect Pathway/Receptor (e.g., vegetables, fruits, crops, meat and dairy products, fish, shellfish, etc.)

"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 to #6, and enter "YE" status code, after explaining and/or referencing condition(s) in-place, whether natural or man-made, preventing a complete exposure pathway from each contaminated medium (e.g., use optional Pathway Evaluation Work Sheet to analyze major pathways).

__X__ 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:

Remaining off-site contamination is limited to soil contamination that inaccessible to the public (i.e., under a heavily treed, inaccessible area or more than ten (10) feet below grade or at the fence line, etc.)

With the completion of the indoor air evaluation is August 2006 and several quarterly rounds of off-site groundwater monitoring results free from contaminants, the Department concludes that, under current conditions, the off-site contamination pathways are not complete.

There are still a large number of areas with on-site soil contamination and groundwater contamination. Workers must wear Personal Protection Equipment (PPE) to avoid contact with this contamination.

Summary of Remedial Action Completed:

In 1999, a portion of the groundwater extraction and treatment system for AEC-3 was constructed, including four of the proposed twelve recovery wells. The remaining wells were installed in 2004 after remediation of soils was essentially completed in AEC-1 and AEC-2. In 2001, a source control Interim Remedial Measure (IRM) was completed in AEC-8. The existing groundwater extraction system for AEC-3 will be operated as long as the Department determines it is necessary. The potential need for extraction and treatment of groundwater from AEC-4 (Deep Groundwater) is based on continued groundwater monitoring.

To date, AEC-1 has been excavated and capped and the majority of AEC-2 has been excavated and removed off-site for disposal. Movement of groundwater contamination in the shallow overburden aquifer (AEC-3) to the deep bedrock aquifer (AEC-4) has significantly decreased since the main sources were removed.

In 2003, AEC-6 (Main Plant Building) was demolished, and debris and soil were removed off-site. The sub-basement of AEC-6 was also excavated and disposed off-site. Excavation of contaminated bedrock soil was completed in October 2004. The majority of AEC-7 was excavated in August 2004, and remediation of AEC-8 (broken out into 8A, 8B, and 8C) has been initiated. 8A and 8B were excavated in 2005. Area 8C was mostly excavated in 2006. Unfortunately, some hazardous waste was not removed, but can be addressed during the future AEC-5 remedial activities in Summer 2008.

In February 2003, a french drain system was installed within AEC-1 to control the migration of contaminated groundwater toward the creek. Collected groundwater is pumped to the on-site wastewater treatment plant for

treatment prior to discharge to Skaneateles Creek.

With regard to AEC-5 (creek and pond sediments), more than 10,000 tons of impacted sediments were excavated and disposed of off-site during the summer of 2005. During recent excavation activities, additional areas of contaminated material along the creek bank were exposed. As an IRM, the soils of Lagoon 1 immediately east of AEC-1 were removed (approximately 50,000 tons) in Summer 2007. Plans are being developed to remediate these areas (tentatively scheduled for July 2008). Ongoing groundwater monitoring to evaluate the effectiveness of implemented selected remedies is planned.

Groundwater: With completion of remedial activities at AEC-1, and the initiation of AEC-3 remedial activities in the vicinity of AEC-1 in 2004, xylene and toluic acid concentrations have been substantially reduced to levels at or near NYSDEC groundwater standards.

In February 2005 (post-remediation), groundwater samples were collected from seven wells, five on-site border bedrock wells (including MW-16I), and two private wells. The samples were analyzed for 41 low detection limit (LDL) volatile organic analytes (VOAs) and Target Compound List (TCL) acid extractable analytes (e.g. toluic acid and benzoic acid). The results showed that none of the LDL VOAs detected in the groundwater samples were at concentrations above NYSDEC Class GA groundwater standards and that no TCL acid extractable semi-volatile organic compounds (including toluic acid and isomers) were detected in any of the groundwater samples. The results confirmed that once the sources of contamination were removed, concentrations of all contaminants in the groundwater were substantially reduced to below (or at) NYSDEC action levels. The concentration of chloroform (0.6 ug/L), vinyl chloride (2 ug/L), and cis 1,2-dichloroethene (4 ug/L) have fallen to below NYSDEC standards. All wells showed low concentrations of methylene chloride and acetone (laboratory artifacts).

After source removal, contaminants detected previously in off-site groundwater have substantially decreased and there is no longer an exposure pathway for residents to come into contact with contaminated groundwater. Most residents within 0.5 mile of the site do not use groundwater for potable or non-potable purposes. This determination was made as the result of a mail survey conducted by the facility during the 1994 RI. Therefore, the potential for exposure of residents to uncontrolled groundwater (i.e., off-site) does not exist. On-site workers are required to wear appropriate PPE, therefore very limited exposures by workers and construction personnel to contaminated groundwater are expected. The surrounding land is not used for agricultural purposes, therefore the contamination of human food sources from groundwater is not anticipated.

Soil: Phase I excavation of the former landfill is complete (draft AEC-1 Closure Report, November 2004). The Phase II AEC-7 & AEC-8 Work Plan was approved by the Department in September 2003. To date, approximately 4,402 tons from AEC-7 has been excavated, sampled, characterized and shipped off-site as non-hazardous solid waste. To date, approximately 19,668 tons of impacted material has been removed from within AEC-8. Approved areas have been backfilled. The Phase IIIA Main Plant Building (AEC-6) demolition and off-site disposal of 46,952 tons of material was completed in July 2003. The Phase IIIB AEC-6 soil remediation and backfilling was completed on November 30, 2004. All of the excavated material has been shipped off-site for disposal at licensed facilities. The AEC-6 Closure Report is currently being prepared by SMC for submittal. The Phase IV AEC-2 soil remediation was initiated on October 27, 2003. To date approximately 90,061 tons has been excavated, characterized and shipped off-site to appropriate receiving facilities. Within approved locations of AEC-2, backfilling operations have been completed.

Although remediation of all the AEC's is not yet complete and some areas of soil contamination remain, these areas are surrounded by a chain-link fence and are not accessible to the general public. On-site workers are required to wear appropriate PPE, therefore very limited exposures by workers and construction personnel to contaminated soil are expected.

Sediment: SMC submitted the revised Phase V AEC-5 Infrastructure Sediment Removal Plan in June 2005 which called for the excavation of the top 2 feet of creek sediment in identified impacted areas. In the summer of 2005, over 10,000 tons of impacted sediments were excavated and disposed of off-site, including the off-site mill pond sediments. During recent sediment excavation activities on-site behind the plant, additional areas of contaminated material on the east bank of the creek were exposed. Recent sampling of this material indicates hazardous levels of PCBs. Plans are being developed to remediate these areas.

Although remediation of AEC-5 is not yet complete and areas of contamination along the creek remain, these areas are not accessible to the general public. On-site workers are required to wear appropriate PPE, therefore very limited exposures by workers and construction personnel to contaminated sediment are expected. In addition, the potential for human exposure to site contaminants via consumption of fish is very low as a result of a specific health advisory pertaining to eating fish from Skaneateles Creek.

References:

1. O'Brien & Gere Engineers, Inc., Pre-Design Hydrogeologic Investigation Report, August 1997
2. IT Corporation, Results of Additional Site Assessment Activities, February 1999
3. SPEC Consulting LLC, Final Focused Feasibility Study for Off-Site Disposal, May 2001
4. EA Engineering, Science and Technology, Final Remedial Investigation Report, August 1994
5. NYS Department of Environmental Conservation, Amended Record of Decision, December 2001
6. Clough, Harbour & Assoc., SMC Skaneateles Falls Well Sampling Summary Report, 08/2000.
7. EA Science and Technology, Final Groundwater Monitoring Report, April 2002.
8. EA Science & Technology Groundwater Monitoring Report, April 25, 2005.
9. NYS Department of Environmental Conservation, Project Update, April 2005.

4. Can the **exposures** from any of the complete pathways identified in #3 be reasonably expected to be **"significant"**[4] (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)?

__X__ 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."

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[4] 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.

_____ If unknown (for any complete pathway) - skip to #6 and enter "IN" status code

Rationale and Reference(s):

There is more than 100 specific locations on-site that still have soil/sediment with contaminant concentrations exceeding Amended Record of Decision cleanup goals. Workers must wear Personal Protection Equipment (PPE) to avoid contact with this contamination.

The on-site areas of contamination will be addressed with the RP as they continue to work with the Department to complete the remediation. Additional pre-design sampling (Phase II of the 2006 Supplemental Investigation) is necessary before remedial action activities can be completed.

Off-site contamination is limited to four (4) locations. Two of these four locations are inaccessible, covered by numerous trees and the soil contamination is likely quite deep, not in the surface soils. One location is a petroleum fuel oil spill which may proceed a small distance (less than 10') west of the fence line near Jordan Road. This area will be satisfactorily remediated during the 2007 remedial construction season. The final location is located in the northwest portion of the site near the site's fence line adjacent to Jordan Road. Although soil contamination is heavy at and under the fence, the sample results from eight (8) soil borings along Jordan Road illustrate this contamination area is small. One of the soil borings contains xylene at a 12-foot depth. Further investigation by the RP or the Department in the near future will confirm that this is merely a point source.

5. Can the "significant" **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 and 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

Rationale and Reference(s):

6. Check the appropriate RCRAInfo status codes for the Current Human Exposures Under Control EI event code (CA725), 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__ YES - 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 **Stauffer Management Co. Site, EPA ID No. NYD004859955** located at **4512 Jordan Road, Skaneateles**

Falls, 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 Human Exposures" are NOT "Under Control."

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

Completed by: _____ Date: 9-28-2007
John Grathwol, P. E., Project Manager
Environmental Engineer II

Supervisor: _____ Date: 9-28-2007
Jack Aversa, P. E., Section Chief
Remedial Section C, Remedial Bureau B
Division of Environmental Remediation

Director: _____ Date: 9-28-2007
Robert J. Phaneuf, P.E., Acting Director
Bureau of Hazardous Waste and Radiation Management
Division of Solid and Hazardous Materials

Locations where References may be found:

New York State Department of Environmental Conservation, Central Office
Division of Environmental Remediation
625 Broadway
Albany, New York 12233

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FINAL NOTE: THE HUMAN EXPOSURES EI IS A QUALITATIVE SCREENING OF EXPOSURES AND THE DETERMINATIONS WITHIN THIS DOCUMENT SHOULD NOT BE USED AS THE SOLE BASIS FOR RESTRICTING THE SCOPE OF MORE DETAILED (E.G., SITE-SPECIFIC) ASSESSMENTS OF RISK.

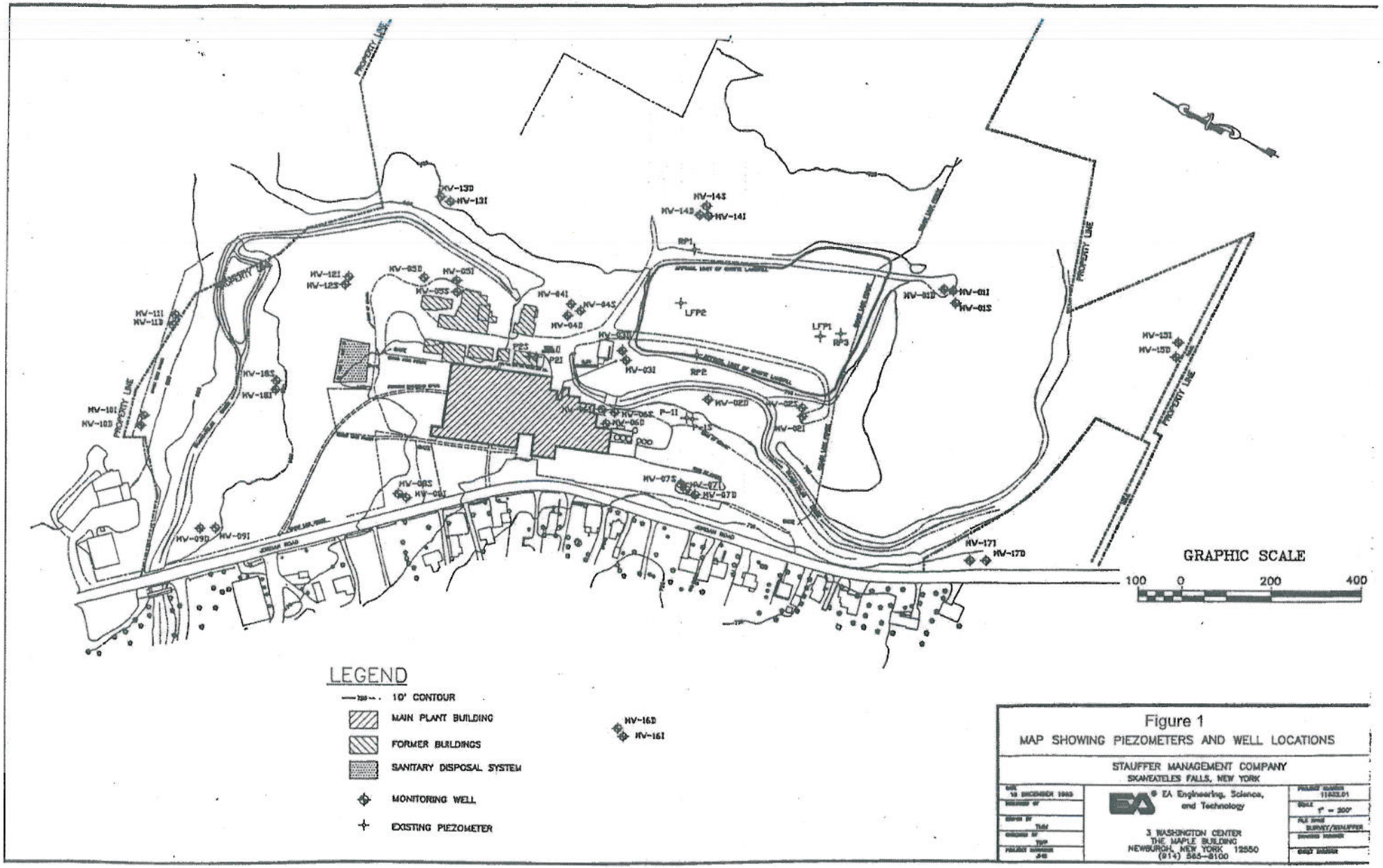

Figure 1

MAP SHOWING PIEZOMETERS AND WELL LOCATIONS

STAUFFER MANAGEMENT COMPANY

SKANEATELES FALLS, NEW YORK

DATE 16 DECEMBER 1993	EA Engineering, Science, and Technology	PROJECT NUMBER 11823.01
DRAWN BY		SCALE 1" = 200'
CHECKED BY TMH		FILE NAME SURVEY/SKAUFFER
APPROVED BY TMH		DRAWING NUMBER
PROJECT MANAGER JHS		SHEET NUMBER

3 WASHINGTON CENTER
THE MAPLE BUILDING
NEWBURGH, NEW YORK 12550
(914) 565-8100

Table 1. Summary of Media Impacted and Areas of Concern Based on Data Collected During the Remedial Investigation

Area of Concern (AOC or AEC)	Ground-water	Indoor Air	Surface Soil	Surface Water	Sedi-ment	Sub-surf Soil	Outdoor Air	Corrective Action Measure and Status	Key Contaminants
AEC-1 (Existing Landfill)	yes	no	yes	yes	no	yes	no	Soil remediation and disposal of wastes in an offsite disposal facility	toluene, xylene, PAHs, toluic acid, chromium, cobalt, mercury, zinc
AEC-2 (Former Organics Plant Area or North Plant Area)	yes	yes	yes	yes	no	yes	no	Soil remediation and disposal of wastes in an offsite disposal facility	xylene, PAHs, toluicacid, chromium, lead, mercury, nickel, zinc
AEC-3 Shallow Groundwater	yes	no	no	yes	yes	no	no	Constructed a shallow groundwater extraction and treatment system	toluene, xylene, PAHs, toluic acid, 4,4'DDE, arsenic, chromium
AEC-4 Deep Groundwater	yes	no	no	yes	no	no	no	Conduct monitoring.Currently no action proposed for deep groundwater	1,2-dichloroethene, toluene, xylene, phenol, toluic acid,4,4'DDE, arsenic
AEC-5 Skaneateles Creek Sediments	yes	no	yes	yes	yes	yes	no	Excavation of contaminated sediments and disposal of wastes in an off-site disposal facility	tetrachloroethene, toluene, xylenes, 1,2dichloroethene, PAHs, antimony, copper, mercury
AEC-6 Main Plant Building	yes	yes	yes	yes	no	yes	no	Soil remediation and disposal of wastes in an offsite disposal facility	toluene, xylene, PAHs, toluic acid, chromium, cobalt, mercury, zinc
AEC-7 Area in Front of Main Plant Building	yes	no	yes	yes	no	yes	no	Soil remediation and disposal of wastes in an offsite disposal facility	toluene, xylene, PAHs, toluic acid, chromium, cobalt, mercury, zinc
AEC-8 South Plant Area	yes	no	yes	yes	no	yes	no	Soil remediation and disposal of wastes in an offsite disposal facility	toluene, xylene, PAHs, toluic acid, chromium, cobalt, mercury, zinc

Table 2. Summary of Groundwater Maximum Detected Concentrations Pre-Remediation (August 1999)

Contaminant (concentrations in ug/L)	Maximum Detected Concentration Pre-Remediation (1999)	NYSDEC Ambient Water Quality Standards and Guidance Values (Class GA)	Maximum > Cleanup Objectives?
Acetone	130	50	Yes
Aluminum	42,800	100	Yes
Ammonia	38,000	2,000	Yes
Antimony	55.6	3	Yes
Arsenic	910	25	Yes
Barium	653	1,000	
Benzene	4	1	Yes
Benzo(a)anthracene	14	0.002	Yes
Benzo(a)pyrene	10	ND	Yes
Benzo(b)fluoranthene	19	0.002	Yes
Benzo(k)fluoranthene	1	0.002	Yes
Benzoic acid	330	-	-
Benzyl alcohol	26	-	-
Beryllium	2.7	3	
Bis(2-chloroethyl)methane	150	1	Yes
Bis(2-ethylhexyl)phthalate	160	5	Yes
Cadmium	12.1	5	Yes
Calcium	666,000	-	-
Chloride	344,000	250,000	Yes
Chloroethane	49	5	Yes
Chromium	6,870	50	Yes
Chrysene	13	0.002	Yes
Cobalt	992	-	-
Copper	1,320	200	Yes
Cyanide	79	200	
4,4-DDE	0.61	0.2 (SCG: ND)	Yes
1,1-Dichloroethane	150	5	Yes
1,1-Dichloroethene	10	5	Yes
1,2-Dichloroethene (total)	1,500	5	Yes
Ethylbenzene	3	5	
Fluorene	2	50	
Fluoride	32,900	1,500	Yes
Iron	76,200	300	Yes

Table 2. Summary of Groundwater Maximum Detected Concentrations Pre-Remediation (August 1999)

Contaminant (concentrations in ug/L)	Maximum Detected Concentration Pre-Remediation (1999)	NYSDEC Ambient Water Quality Standards and Guidance Values (Class GA)	Maximum > Cleanup Objectives?
Lead	1,370	25	Yes
Magnesium	82,400	35,000	Yes
Manganese	7,460	300	Yes
Naphthalene	9	10	
Nickel	1,090	100	Yes
Nitrate	4,400	10,000	
Nitrobenzene	18	0.4	Yes
Pentachlorophenol	20	1	Yes
4-methyl-2-pentanone	71	-	-
Phenanthrene	1	50	
Phenol	2,400	1	Yes
2,4-Dimethylphenol	320	1	Yes
2-Methylphenol	30	1	Yes
4-Methylphenol	69	1	Yes
Di-n-butyl phthalate	2	50	
Potassium	85,800	-	-
Selenium	6.4	10	
Sodium	4,770,000	20,000	Yes
Sulfate	62,900	250,000	
Tetrachloroethene	2,900	5	Yes
Toluene	1,600	5	Yes
M-toluic acid	450,000	31,000	Yes
O-toluic acid	690,000	31,000	Yes
P-toluic acid	240,000	31,000	Yes
Trichloroethene	180	5	Yes
Vanadium	343	-	-
Vinyl chloride	21	2	Yes
Xylenes (total)	73,000	5	Yes
Zinc	1,140	2,000	

(-) - Water quality standards were not provided for this constituent.
ND - non-detect
References: Tables 4-14, 4-15, 4-16, 4-18, 4-19, 4-20, 4-21, and 4-22 of the Remedial Investigation Report, dated August 1994. Tables 1.3, 1.4, 1.5 and 1.6 of the Final Focused Feasibility Study for Off-Site Disposal, dated May 18, 2001. Tables 1.3, 1.4, 1.5 and 1.6 of 2001 Amended ROD.

Table 3

Target Analytes

Offsite Groundwater Monitoring and Private Wells

Stauffer Management Company - Skaneateles Falls Site

LOW DETECTION LIMIT VOLATILE ORGANIC COMPOUNDS (VOC)			
Chemical	CAS#	Chemical	CAS#
Acetone	67-64-1	cis-1,3-Dichloropropene	10061-01-5
Benzene	71-43-2	trans-1,3-Dichloropropene	10061-02-6
Bromodichloromethane	75-27-4	Ethylbenzene	100-41-4
Bromoform	75-25-2	2-Hexanone	591-78-6
Bromomethane	74-83-9	Methylene Chloride	75-09-2
2-Butanone (MEK)	78-93-3	4-Methyl-2-Pentanone	108-10-1
Carbon Disulfide	75-15-0	Styrene	100-42-5
Carbon Tetrachloride	75-00-3	1,1,2,2-Tetrachloroethane	79-34-5
Chlorobenzene	56-23-5	Tetrachloroethene	127-18-4
Chloroethane	108-90-7	Toluene	108-88-3
Chloroform	67-66-3	1,1,1-Trichloroethane	71-55-6
Chloromethane	74-87-3	1,1,2-Trichloroethane	79-00-5
2-Chloroethylvinylether	110-75-8	Trichlorofluoromethane	75-69-4
Dibromochloromethane	124-48-1	Trichloroethene	79-01-6
Dichlorodifluoromethane	75-61-6	Vinyl Acetate	108-05-4
1,1-Dichloroethane	75-34-3	Vinyl Chloride	75-01-4
1,2-Dichloroethane	107-06-2	Total Xylenes	1300-73-8
1,1-Dichloroethene	75-35-4	1,3-Dichlorobenzene	541-73-1
cis-1,2-Dichloroethene	156-59-2	1,4-Dichlorobenzene	106-46-7
trans-1,2-Dichloroethene	156-60-5	1,2-Dichlorobenzene	95-50-1
1,2-Dichloropropane	78-87-5		

SEMI-VOLATILE ORGANIC COMPOUNDS (SVOC)			
Chemical	CAS#	Chemical	CAS#
Phenol	108-95-2	2,4,6-Trichlorophenol	88-06-2
2-Chlorophenol	95-57-8	2,4,5-Trichlorophenol	95-95-4
2-Methylphenol	95-48-7	2,4-Dinitrophenol	51-28-5
4-Methylphenol	106-44-5	4-Nitrophenol	100-2-7
2-Nitrophenol	88-75-5	2-Methyl-4,6-Dinitrophenol	534-52-1
2,4-Dimethylphenol	105-67-9	Pentachlorophenol	87-86-5
Benzoic Acid	65-85-0	o-Toluic Acid	NA
2,4-Dichlorophenol	120-83-2	m-Toluic Acid	NA
4-Chloro-3-Methylphenol	59-50-7	p-Toluic Acid	NA

Table 4

Analytical Summary

Offsite Groundwater
Monitoring and Private Wells

Stauffer Management Company
Skaneateles Falls Site

Q2 2007		Sample ID	MW-16D	MW-16I	MW-19D	MW-19I	MW-20D
		CES Sample#	No Sample	492623 492628	492624 492629	No Sample	492625 492630
		Sample Date		7/10/2007	7/10/2007		7/10/2007
Target Analyte	***CAS #***	**Typical Detection Limit (ppb)**					
Volatiles (8260)							
Acetone	*67-64-1*	*5*	-	ND	ND	-	ND
Benzene	*71-43-2*	*1*	-	ND	ND	-	ND
Bromodichloromethane	*75-27-4*	*1*	-	ND	ND	-	ND
Bromoform	*78-93-3*	*1*	-	ND	ND	-	ND
Bromomethane	*75-25-2*	*2*	-	ND	ND	-	ND
2-Butanone (MEK)	*74-83-9*	*5*	-	ND	ND	-	ND
Carbon Disulfide	*75-15-0*	*1*	-	ND	ND	-	ND
Carbon Tetrachloride	*56-23-5*	*1*	-	ND	ND	-	ND
Chlorobenzene	*108-90-7*	*1*	-	ND	ND	-	ND
Chloroethane	*75-00-3*	*2*	-	ND	ND	-	ND
Chloroform	*67-66-3*	*1*	-	ND	ND	-	ND
Chloromethane	*74-87-3*	*2*	-	ND	ND	-	ND
2-Chloroethylvinylether	*110-75-8*	*5*	-	ND	ND	-	ND
Dibromochloromethane	*124-48-1*	*1*	-	ND	ND	-	ND
Dichlorodifluoromethane	*75-61-6*	*2*	-	ND	ND	-	ND
1,1-Dichloroethane	*75-34-3*	*1*	-	ND	ND	-	ND
1,2-Dichloroethane	*107-06-2*	*1*	-	ND	ND	-	ND
1,1-Dichloroethene	*75-35-4*	*1*	-	ND	ND	-	ND
cis-1,2-Dichloroethene	*156-59-2*	*1*	-	ND	ND	-	ND
trans-1,2-Dichloroethene	*156-60-5*	*1*	-	ND	ND	-	ND
1,2-Dichloropropane	*78-87-5*	*1*	-	ND	ND	-	ND
cis-1,3-Dichloropropene	*10061-01-5*	*1*	-	ND	ND	-	ND
trans-1,3-Dichloropropene	*10061-02-6*	*1*	-	ND	ND	-	ND
Ethylbenzene	*100-41-4*	*1*	-	ND	ND	-	ND
2-Hexanone	*591-78-6*	*5*	-	ND	ND	-	ND
Methylene Chloride	*75-09-2*	*1*	-	ND	ND	-	ND
4-Methyl-2-Pentanone	*108-10-1*	*5*	-	ND	ND	-	ND
Styrene	*100-42-5*	*1*	-	ND	ND	-	ND
1,1,2,2-Tetrachloroethane	*79-34-5*	*1*	-	ND	ND	-	ND
Tetrachloroethene	*127-18-4*	*1*	-	ND	ND	-	ND
Toluene	*108-88-3*	*1*	-	ND	ND	-	ND
1,1,1-Trichloroethane	*71-55-6*	*1*	-	ND	ND	-	ND
1,1,2-Trichloroethane	*79-00-5*	*1*	-	ND	ND	-	ND
Trichlorofluoromethane	*75-69-4*	*1*	-	ND	ND	-	ND
Trichloroethene	*79-01-6*	*1*	-	ND	ND	-	ND
Vinyl Acetate	*108-05-4*	*5*	-	ND	ND	-	ND
Vinyl Chloride	*75-01-4*	*1*	-	ND	ND	-	ND
Total Xylenes	*1300-73-8*	*3*	-	ND	ND	-	ND
1,3-Dichlorobenzene	*541-73-1*	*1*	-	ND	ND	-	ND
1,4-Dichlorobenzene	*106-46-7*	*1*	-	ND	ND	-	ND
1,2-Dichlorobenzene	*95-50-1*	*1*	-	ND	ND	-	ND
SVOC - (8270)							
Phenol	*108-95-2*	*5*	-	ND	ND	-	ND
2-Chlorophenol	*95-57-8*	*5*	-	ND	ND	-	ND
2-Methylphenol	*95-48-7*	*10*	-	ND	ND	-	ND
4-Methylphenol	*106-44-5*	*10*	-	ND	ND	-	ND
2-Nitrophenol	*88-75-5*	*10*	-	ND	ND	-	ND
2,4-Dimethylphenol	*105-67-9*	*5*	-	ND	ND	-	ND
Benzoic Acid	*65-85-0*	*20*	-	ND	ND	-	ND
2,4-Dichlorophenol	*120-83-2*	*5*	-	ND	ND	-	ND
4-Chloro-3-Methylphenol	*59-50-7*	*5*	-	ND	ND	-	ND
2,4,6-Trichlorophenol	*88-06-2*	*5*	-	ND	ND	-	ND
2,4,5-Trichlorophenol	*95-95-4*	*5*	-	ND	ND	-	ND
2,4-Dinitrophenol	*51-28-5*	*10*	-	ND	ND	-	ND
4-Nitrophenol	*100-2-7*	*10*	-	ND	ND	-	ND
2-Methyl-4,6-Dinitrophenol	*534-52-1*	*10*	-	ND	ND	-	ND
Pentachlorophenol	*87-86-5*	*5*	-	ND	ND	-	ND
o-Toluic Acid	*NA*	*5*	-	ND	ND	-	ND
m-Toluic Acid	*NA*	*5*	-	ND	ND	-	ND
p-Toluic Acid	*NA*	*5*	-	ND	ND	-	ND

NOTES:
All units are in ppb
Dash indicates Not Analyzed

Table 4

Analytical Summary

Offsite Groundwater
Monitoring and Private Wells

Stauffer Management Company
Skaneateles Falls Site

Q2 2007			Sample ID	MW-20I	DUP (MW-19D)	Trip Blank	PW-14 Harvard	PW-19 Brewer
			CES Sample#	492987 492988	492626 492631	492989	493813 493814	493811 493812
			Sample Date	7/11/2007	7/10/2007	7/11/2007	7/20/2007	7/20/2007
Target Analyte	*CAS #*	**Typical Detection Limit (ppb)**						
Volatiles (8260)								
Acetone	*67-64-1*	*5*		ND	ND	ND	ND	ND
Benzene	*71-43-2*	*1*		ND	ND	ND	ND	ND
Bromodichloromethane	*75-27-4*	*1*		ND	ND	ND	ND	ND
Bromoform	*78-93-3*	*1*		ND	ND	ND	ND	ND
Bromomethane	*75-25-2*	*2*		ND	ND	ND	ND	ND
2-Butanone (MEK)	*74-83-9*	*5*		ND	ND	ND	ND	ND
Carbon Disulfide	*75-15-0*	*1*		ND	ND	ND	ND	ND
Carbon Tetrachloride	*56-23-5*	*1*		ND	ND	ND	ND	ND
Chlorobenzene	*108-90-7*	*1*		ND	ND	ND	ND	ND
Chloroethane	*75-00-3*	*2*		ND	ND	ND	ND	ND
Chloroform	*67-66-3*	*1*		ND	ND	ND	ND	ND
Chloromethane	*74-87-3*	*2*		ND	ND	ND	ND	ND
2-Chloroethylvinylether	*110-75-8*	*5*		ND	ND	ND	ND	ND
Dibromochloromethane	*124-48-1*	*1*		ND	ND	ND	ND	ND
Dichlorodifluoromethane	*75-61-6*	*2*		ND	ND	ND	ND	ND
1,1-Dichloroethane	*75-34-3*	*1*		ND	ND	ND	ND	ND
1,2-Dichloroethane	*107-06-2*	*1*		ND	ND	ND	ND	ND
1,1-Dichloroethene	*75-35-4*	*1*		ND	ND	ND	ND	ND
cis-1,2-Dichloroethene	*156-59-2*	*1*		ND	ND	ND	ND	ND
trans-1,2-Dichloroethene	*156-60-5*	*1*		ND	ND	ND	ND	ND
1,2-Dichloropropane	*78-87-5*	*1*		ND	ND	ND	ND	ND
cis-1,3-Dichloropropene	*10061-01-5*	*1*		ND	ND	ND	ND	ND
trans-1,3-Dichloropropene	*10061-02-6*	*1*		ND	ND	ND	ND	ND
Ethylbenzene	*100-41-4*	*1*		ND	ND	ND	ND	ND
2-Hexanone	*591-78-6*	*5*		ND	ND	ND	ND	ND
Methylene Chloride	*75-09-2*	*1*		ND	ND	ND	ND	ND
4-Methyl-2-Pentanone	*108-10-1*	*5*		ND	ND	ND	ND	ND
Styrene	*100-42-5*	*1*		ND	ND	ND	ND	ND
1,1,2,2-Tetrachloroethane	*79-34-5*	*1*		ND	ND	ND	ND	ND
Tetrachloroethene	*127-18-4*	*1*		ND	ND	ND	ND	ND
Toluene	*108-88-3*	*1*		ND	ND	ND	ND	ND
1,1,1-Trichloroethane	*71-55-6*	*1*		ND	ND	ND	ND	ND
1,1,2-Trichloroethane	*79-00-5*	*1*		ND	ND	ND	ND	ND
Trichlorofluoromethane	*75-69-4*	*1*		ND	ND	ND	ND	ND
Trichloroethene	*79-01-6*	*1*		ND	ND	ND	ND	ND
Vinyl Acetate	*108-05-4*	*5*		ND	ND	ND	ND	ND
Vinyl Chloride	*75-01-4*	*1*		ND	ND	ND	ND	ND
Total Xylenes	*1300-73-8*	*3*		ND	ND	ND	ND	ND
1,3-Dichlorobenzene	*541-73-1*	*1*		ND	ND	ND	ND	ND
1,4-Dichlorobenzene	*106-46-7*	*1*		ND	ND	ND	ND	ND
1,2-Dichlorobenzene	*95-50-1*	*1*		ND	ND	ND	ND	ND
SVOC - (8270)								
Phenol	*108-95-2*	*5*		ND	ND	-	ND	ND
2-Chlorophenol	*95-57-8*	*5*		ND	ND	-	ND	ND
2-Methylphenol	*95-48-7*	*10*		ND	ND	-	ND	ND
4-Methylphenol	*106-44-5*	*10*		ND	ND	-	ND	ND
2-Nitrophenol	*88-75-5*	*10*		ND	ND	-	ND	ND
2,4-Dimethylphenol	*105-67-9*	*5*		ND	ND	-	ND	ND
Benzoic Acid	*65-85-0*	*20*		ND	ND	-	ND	ND
2,4-Dichlorophenol	*120-83-2*	*5*		ND	ND	-	ND	ND
4-Chloro-3-Methylphenol	*59-50-7*	*5*		ND	ND	-	ND	ND
2,4,6-Trichlorophenol	*88-06-2*	*5*		ND	ND	-	ND	ND
2,4,5-Trichlorophenol	*95-95-4*	*5*		ND	ND	-	ND	ND
2,4-Dinitrophenol	*51-28-5*	*10*		ND	ND	-	ND	ND
4-Nitrophenol	*100-2-7*	*10*		ND	ND	-	ND	ND
2-Methyl-4,6-Dinitrophenol	*534-52-1*	*10*		ND	ND	-	ND	ND
Pentachlorophenol	*87-86-5*	*5*		ND	ND	-	ND	ND
o-Toluic Acid	*NA*	*5*		ND	ND	-	ND	ND
m-Toluic Acid	*NA*	*5*		ND	ND	-	ND	ND
p-Toluic Acid	*NA*	*5*		ND	ND	-	ND	ND

NOTES:
All units are in ppb
Dash indicates Not Analyzed

Table 5

Historical Analytical Data Summary

Analytes Appearing in Offsite Groundwater Sampling

Stauffer Management Company - Skaneateles Falls Site

Period Ending: Q2 2007

	Q1 2005	Q2 2005	Q3 2005	Q4 2005	Q1 2006	Q2 2006	Q3 2006	Q4 2006	Q1 2007	Q2 2007	NYSDEC Class GA Standards (ppb)
MW-16I (DUP)											
cis-1,2-Dichloroethene	4 (4)	1 (1)		1.8 (1.9)	2.09 (2.07)						5
vinyl chloride	2 (2)										2
MW-19D											
chloroform			5	3.4	0.80						7

Note:

Concentrations are in µg/L (ppb)

Estimated concentrations (below practical quantification limit) and concentrations for analytes also detected in method blank are not listed

Results in parenthesis are duplicate sample results