

PRP/HTRW PROJECT SUMMARY SHEET
LAKE ONTARIO ORDNANCE WORKS
FUDS PROJECT NUMBER C02NY002507
23 FEBRUARY 2007

PROJECT DESCRIPTION: This PRP/HTRW project summary sheet is part of Addendum No. 1 to the initial Inventory Project Report (INPR) with the Findings and Determination of Eligibility (FDE) signed 15 June 1986, and proposes a PRP/HTRW project.

The original INPR stated that Service Corporation of America (SCA), a predecessor of one of the current owners, CWM Chemical Services LLC. (CWM LLC.), submitted a claim against Department of Defense (DOD) pursuant to CERCLA. The claim stated that SCA spent more than \$50,000 and requested that DOD assume all financial responsibility for future investigation costs as well as the cost of removing additional material as necessary to prevent or abate the release of hazardous wastes from the site. The original INPR also stated that Olin Mathieson (Olin) and SCA had already undertaken certain cleanup efforts in response to a request by New York State Department of Environmental Conservation (NYSDEC) (Olin correspondence cites an agreement with SCA to pay for cleanup of some areas). The eligibility determination section of the original FDE stated that contamination was identified at the site that could be DOD responsibility; however, there was no certainty as to whether DOD was solely or jointly responsible. The original INPR recommended "that DoD conduct a Remedial Investigation / Feasibility Study (RI/FS) covering the areas of suspected DoD responsibility". The original INPR thus authorized a project to conduct an RI/FS to address chemical and explosive contaminants across eligible properties encompassing the former LOOW.

USACE has conducted a historical search and sampling as part of the ongoing RI (project No. C02NY002501). The following PRP/HTRW issues associated with the former LOOW were identified during this effort:

- A large portion of the original LOOW (approximately 1,500 acres) was transferred to Atomic Energy Commission (AEC), non-DOD entity, after 1946. This area was subsequently referred to as the Lake Ontario Storage Area (LOSA). AEC accepted radioactive waste materials from the Knolls Atomic Power Laboratory (KAPL) as well as from other facilities, and stored them on the LOSA site in buildings, rail cars, a water tower, the former water treatment facilities, and on the ground. According to a report prepared by the NY State Assembly, most of the KAPL wastes were shipped from LOSA to Oak Ridge, TN, however, some waste was allegedly burned onsite by Hooker Chemical Co. (AEC's contractor) in the late 1950s. The "KAPL wastes" were reportedly burned on a former building foundation on the north side of the western portion of "M" street. This area is within "Vicinity Property H" and the former USACE constructed "contaminated materials storage area (CMSA)". AEC stopped accepting radioactive wastes at the LOSA in 1953. Hooker began a limited consolidation and cleanup of the material at that time.
- A small portion of the AEC property and several existing buildings were used in the separation of Boron Isotopes. These operations were known as the Boron 10 Production Plant (Boron 10 Plant). The facility was operated by AEC's contractor, Hooker Chemical Co., from 1953 to 1958. The facility was placed in standby, was shut down for a period, and then was restarted and operated by a second AEC contractor (Nuclear Materials and Equipment Corporation [NUMEC]) from 1965 to 1971. During these

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periods the former sewage and wastewater treatment plant and the former boiler building (Building 401) associated with the LOOW TNT production facility were part of the Boron 10 operations.

- Some of the land originally transferred to AEC was occupied from approximately 1954 through 1962 under use and right of entry permits by the Navy and Air Force for various GOCO operations including operation of Air Force Plant 68 (AFP-68) and the Navy Interim Pilot Production Plant (Navy IPPP). Both of these operations were GOCO facilities operated by Olin, and they were constructed for the testing and production of boron-based high-energy fuels (HEF). The Navy IPPP was more of a test facility. AFP-68 was slated to become a production facility; however, production in AFP-68 was cancelled after startup testing operations. Both of these operations were tied into existing wastelines as well as the sewage and wastewater treatment plant. Additional process/waste lines were installed for production. Olin was reportedly involved in decommissioning the AFP-68 facilities.
- The area owned by Somerset Group, part of the former AFP-68, has not been maintained. According to the current owner minimal use has been made of the existing buildings/facilities. During a 2001 site visit, poor housekeeping operations were observed (e.g., abandoned vehicles parked around the site and in Building No. 41, engine repair operations ongoing in Building No. 41, oil spills, stains, etc.). Indirect current owner impact to an existing UST was observed (run-off tied into a sump in Building No. 41 was thought to be connected to an existing UST). The current owner was observed pumping out this same sump onto the ground (the sump contained dark black/gray water with a slight sheen).
- CWM LLC. and its predecessor companies (Chem-Trol/SCA) have used portions of the former LOOW/AFP-68 site for waste treatment, storage, and disposal operations. CWM has constructed landfills, processing areas, storage lagoons, etc. throughout its property. Some CWM LLC. facilities are situated over underground lines associated with the former LOOW and Navy IPPP. The NYSDEC and USACE have identified specific lines installed by DOD as part of the TNT facility or the Navy IPP/AFP-68 which have been impacted by CWM LLC. or its predecessors (reports/studies prepared by NYSDEC and the Town of Lewiston document liquids overflowing from manholes and getting into the sewage and wastewater treatment plant and the central drainage ditch during operation of the adjacent site by CWM LLC.). Some of the underground lines have been excavated, cleaned, and capped by CWM LLC.. Many of CWM LLC.'s response actions involving the lines have occurred east of the Central Drainage ditch upgradient of the former AFP-68 location.
- In May 1975, the Town of Lewiston sealed an abandoned LOOW influent 30-in. sewer line just east of the former LOOW sewage and wastewater treatment plant. The sewer line was sealed due to suspicion that waste was entering the sewage and wastewater treatment plant from Chem-Trol (predecessor to SCA and CWM LLC.). A water pollution case report issued by the NYDOH stated that floating organic material, believed to be industrial organic waste, was found floating in the manholes of abandoned sanitary sewers adjacent to Chem-Trol operations. Similar

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organic waste was also found on the surface of in-ground, concrete chemical waste storage tanks operated by Chem-Trol.

- The ongoing RI effort includes soil and groundwater investigations as well as incidental cleanup/removal of asbestos material by USACE on property owned by The Somerset Group and CWM LLC.. In accordance with DERP-FUDS policy, the cleanup was conducted as part of the authorized HTRW project (project No. C02NY002501) for reasons of health and safety (the areas to be sampled were littered with asbestos). It was reported that the contractors involved in the original decommissioning of the AFP-68 site may have been the cause of asbestos being spread around the site.
- In 2000/2001 a removal/closure operation was conducted under contract to USACE (DERP-FUDS project No. C02NY002502). The project involved the removal and closure in place of the former TNT waste line from the TNT wash-houses down to the sewage and wastewater treatment plant. The interim action was completed by 30 September 2003. One section of piping was not cleaned but left in place under an existing lagoon operated by CWM LLC.. During pipeline removal/closure operations in August 2000, TNT crystals were observed on the ground surface in three separate locations along the pipeline. In a report entitled "Project Report Second Phase Emergency Ordnance Explosive Services Lake Ontario Ordnance Works TNT Pipeline Removal Project Lewiston, New York" prepared by ISSI Unexploded Ordnance Inc. (a contractor to Severson), it was reported that approximately 6 pounds (explosive weight) of TNT was found on the surface of the site along the former LOOW TNT waste line. It was reported that over 95% TNT was present in the sample.
- During the 2001 site visit, EA personnel observed what appeared to be parts of a degreasing sink (including a hood with a fan for volatiles) located in Building No. 41 (part of AFP-68) along the western wall of the building in the repair area. According to the current owner this sink has not been used. Piping/drains associated with this degreasing sink may represent a potential PRP/HTRW hazard. In addition, EA observed piping associated with the former AFP-68 operations that may represent a potential DOD PRP/HTRW hazard. On property owned by Occidental Chemical Corporation (Occidental), EA personnel observed what may have been a landfill associated with the former operation of LOOW (initially identified in aerial photographs from the 1940s). Material in the western portion of the landfill (clay piping, rusted drums, transite panels) appeared to be of DOD vintage, while material in the eastern portion of the landfill along the access road appeared to be more recent (plastic bottles, tires, and miscellaneous things on the surface). Unknown material potentially present in the drums/landfill may represent a potential PRP/HTRW hazard.

PROJECT ELIGIBILITY: Contamination has been found at the former LOOW site for which DOD as well as other past/current owners and operators may bear CERCLA responsibility; therefore, a PRP/HTRW project is eligible. HTRW issues are related to DOD contractor GOCO operations (LOOW, AFP-68, and Navy IPPP) as well as subsequent owner operations. Several GOCO operators/successors including Olin Mathieson appear to be viable.

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POLICY CONSIDERATIONS: There are no policy considerations that prevent the proposal of a PRP/HTRW project at this site.

PROPOSED ACTIVITIES: As liability issues arise, the Corps will provide appropriate legal representation regarding DoD's share of liability. Activities may include further investigation into the ownership and operation of those portions of the site that are in contention and negotiations to come to agreement on liability issues.

PROJECT POINT OF CONTACT: Bill Kowalewski, CELRB-PM-F, (716) 879-4418.

LEAD REGULATOR: Kent Johnson, New York State Department of Environmental Conservation (NYSDEC), (518) 402-8594.

PROJECT SUMMARY SHEET
FOR
DERP-FUDS PRP/HTRW PROJECT
LAKE ONTARIO ORDNANCE WORKS
LEWISTON/PORTER, NIAGARA COUNTY NEW YORK
SITE NO. C02NY0025
21 DECEMBER 2001

PROJECT DESCRIPTION: This PRP/HTRW project summary sheet is part of Addendum No. 1 to the initial Inventory Project Report (INPR) with the Findings and Determination of Eligibility (FDE) signed 15 June 1986. This addendum combines additional periods of use originally identified as separate sites into the INPR for the Lake Ontario Ordnance Works (LOOW) site (C02NY0025). Those sites which are included in the LOOW INPR are as follows: C02NY0012 (entitled Ransomville Test Annex [RTA] and signed 17 December 1992), C02NY0074 (entitled NIKE Battery NF-03 and signed 20 September 1985) and C02NY0576 (entitled Air Force Plant # 68 [AFP-68] signed 3 January 1992). Two additional sites C02NY0005 (identified as the Youngstown National Guard Facility) and C02NY0003 (identified as Air Force Plant 38 [AFP-38]) were determined to be ineligible since they are active DOD sites. However, since these sites were part of the original FUDS-eligible LOOW, they are also incorporated into this addendum. The addendum addresses site history, past uses of the site, and additional environmental and safety concerns remaining at the site.

The United States Department of Defense (DOD) acquired a total of approximately 7,567.46 acres in the towns of Lewiston and Porter Niagara County, New York at various times and by various methods for various uses. The acquisition of these 7,567.46 acres was for the construction of LOOW. Subsequent to the operation of LOOW, additional periods of DOD use occurred during which portions of the site were identified as the Northeast Chemical Warfare (NECW) Depot, U.S. Air Force Plant 38 (AFP-38), Model City Igloo Area, Army National Guard Weekend Training Site (WETS), Navy Interim Pilot Production Plant (IPPP), AFP-68, NIKE Missile Battery NF-03/05, RTA, and the Youngstown Test Annex (YTA). Approximately 974.37 acres (98.62 acres fee associated with the YTA/the former Launch Area of NIKE Missile Battery NF-03/05 and 860.67 fee and 15.08 acres easement associated with the Army National Guard Weekend Training Site (WETS)/formerly known as AFP-38 and Model City Igloo Area) are still owned by DOD; therefore, this acreage is ineligible for consideration under DERP-FUDS. Potential PRP/HTRW hazards specifically associated with these ineligible parcels are not included in the discussion since they are ineligible for consideration under DERP-FUDS and should be addressed under the Installation Restoration Program (IRP).

The following identify potential PRP/HTRW issues associated with the former LOOW:

- Between 1940-1943 LOOW was constructed and operated as a TNT manufacturing facility. The site was a government owned-contractor operated (GOCO) facility operated by the Chemical Construction Corporation (CCC) for DOD. In 1943, partial decontamination of the site was completed by John W. Cowper Co. and John W. Danforth Co. The work mainly involved the decontamination of process equipment, machinery, tools, and surplus stock items that were in high demand by other bases. It was reported that much of this material was transferred to other facilities. However, no list indicating what was decontaminated and no certificate of decontamination was found.

PRP/HTRW PROJECT SUMMARY SHEET (Continued)
LAKE ONTARIO ORDNANCE WORKS
PRP/HTRW PROJECT
LEWISTON/PORTER, NIAGARA COUNTY NEW YORK
SITE NO. C02NY0025

- A portion of the site was transferred to Atomic Energy Commission (AEC), non-DOD entity, after 1946. The AEC supervised the operation of a Boron 10 production plant on the former LOOW. The facility was operated by AEC's contractor, Hooker Chemical Co., from 1953 to 1958. The facility was shut down for a period and then restarted and operated by a second AEC contractor (Nuclear Materials and Equipment Corporation [NUMEC]) from 1965 to 1971. During this period the former wastewater treatment plant was part of the operation. Additional reports indicate that AEC stored material around the former LOOW site in buildings, rail cars, a water tower, the former water treatment facilities, and sometimes on the ground. Although it was reported that most of the wastes from the Knolls Atomic Power Laboratory (KAPL) were shipped to Oak Ridge, TN, it was also alleged that some waste was allegedly burned onsite by Hooker Chemical Co. (AEC's contractor) in the late 1950s. The location of the burn site has not been identified.
- Some of the land originally transferred to AEC was occupied under use permit by the Navy/Air Force for various operations including operation of the Navy IPP and AFP-68. Both of these were GOCO facilities operated by Olin Mathieson and they were constructed for the testing and production of boron based high-energy fuels (HEF). The Navy IPPP was more of a test facility and AFP-68 was to become a production facility; however, production in AFP-68 was cancelled after startup testing operations. Both of these operations were tied into existing wastelines as well as the wastewater Treatment Plant. Additional process/waste lines were installed for production. Based on a review of available information, Olin Mathieson was reportedly involved in decommissioning the AFP 68 facilities.
- The area owned by Somerset Group, part of the former AFP-68 has not been maintained. According to the current owner minimal use has been made of the existing buildings/facilities. During a recent site visit, poor housekeeping operations were observed (i.e. abandoned vehicles parked around the site and in Building No. 41, engine repair operations ongoing in Building No. 41, oil spills, stains, etc.). Indirect current owner impact to an existing UST was observed (run/off tied into a sump in Building No. 41 was thought to be connected to an existing UST). The current owner was observed pumping out this same sump on to the ground (the sump contained dark black/gray water with a slight sheen). In addition, the current owner reportedly leased at least one building; however, tenant operations were not identified.
- CWM and its predecessor companies (Chemtrol/SCA) have used most of the southern portion of the former LOOW/AFP 68 site as a hazardous waste facility. CWM has constructed landfills, processing areas, storage lagoons, etc. The NYDEC and USACE have identified specific lines installed by DOD as part of the TNT facility or the Navy IPP/AFP 68 which have been impacted by CWM or its predecessors (reports/studies prepared by NYDEC and the Town of Lewiston document liquids overflowing from manholes and getting into the WWTP and the central drainage ditch during operation of the adjacent site by CWM). Some of the underground lines have been excavated cleaned and capped by CWM. In addition, CWM facilities are situated on top of some of the former DOD lines. Many of the response actions involving the lines have occurred east of the Central Drainage ditch upgradient of the former AFP 68 location.

PRP/HTRW PROJECT SUMMARY SHEET (Continued)
LAKE ONTARIO ORDNANCE WORKS
PRP/HTRW PROJECT
LEWISTON/PORTER, NIAGARA COUNTY NEW YORK
SITE NO. C02NY0025

- In May 1975, the Town of Lewiston sealed an abandoned LOOW influent 30-in. sewer line just east of the former LOOW wastewater treatment plant. The sewer line was sealed due to suspicion that waste was entering the wastewater treatment plant from Chem-Trol (predecessor to SCA and CWM). A water pollution case report issued by the NYDOH stated that floating organic material, believed to be industrial organic waste, was found floating in the manholes of abandoned sanitary sewers adjacent to Chem-Trol operations. Similar organic waste was also found on the surface of in-ground, concrete chemical waste storage tanks operated by Chem-Trol.
- USACE has conducted numerous sampling events as part of the ongoing RI. Part of the RI process involved cleanup of asbestos material on property owned by The Somerset Group and CWM. It was reported that the contractors involved in the original decommissioning of the site may have been the cause of asbestos being spread around the site.

It is also noted that the original LOOW INPR (signed 6/15/86) states that SCA has submitted a claim against DOD pursuant to CERCLA. According to the INPR, the claim says SCA has spent more than 50k and it requests that DOD assume all financial responsibility for future investigation costs as well as the cost of removing additional material as may become necessary to prevent or abate the release of hazardous wastes from the site. The INPR also states that Olin and SCA have already undertaken certain cleanup efforts in response to a request by NYDEC (Olin signed a consent decree with CWM and paid for clean up of some areas saying they were partly responsible). In the eligibility determination section of the original FDE, it states that contamination was identified at the site which could be DOD responsibility; however, there was not certainty as to whether DOD was solely or jointly responsible; therefore a Remedial Investigation (RI) was recommended to determine the hazards. Based on a review of the information collected since the original INPR, a PRP/HTRW investigation is warranted.

PROJECT ELIGIBILITY: The former LOOW, AFP-68/Navy IPPP, NIKE Missile Battery NF-03/05, and RTA were DOD owned installations. During various periods of use including LOOW, Navy IPPP and AFP-68 the site functioned as a GOCO facility. The site is no longer owned by DOD.

POLICY CONSIDERATIONS: According to DERP-FUDS policy, a PRP/HTRW project may be proposed if there is physical or reliable testimonial evidence that DOD is potentially responsible for property contamination and that the contamination may be at least partially the result of other PRP's actions. Current DERP-FUDS policy also states that in reference to GOCO facilities, that if a FUDS was operated by another party under a contract or lease or other commercial arrangement during the period the property was under the jurisdiction of DOD and hazardous substances were disposed during that period of operations, and that party is apparently financially viable, then a PRP project will be designated and the operator will be considered a PRP for the property. Therefore, based on a review of available information including historical site information, ongoing RI results and DERP-FUDS policy, it would appear that past/current owners and operators may be responsible for contamination which has been reported at the site. Therefore a PRP/HTRW project is warranted.

PRP/HTRW PROJECT SUMMARY SHEET (Continued)
LAKE ONTARIO ORDNANCE WORKS
PRP/HTRW PROJECT
LEWISTON/PORTER, NIAGARA COUNTY NEW YORK
SITE NO. C02NY0025

PROPOSED PROJECT: A PRP/HTRW investigation is proposed to assess potential contribution by others in conjunction with DOD responsibility for the existing and potential contamination at the site. The proposed PRP/HTRW project will expand on the site history report and identify responsible parties and their relation to the reported contamination associated with the former operation of the LOOW, AFP-68, Navy IPPP as well as subsequent/current owner operations.

EPA FORM 2070-12: Attached.

PROJECT COST SUMMARY: Attached.

DISTRICT POC: Mary K. Foley, CELRB-PM-PM, (716) 879-4417.

PROJECT COST SUMMARY
DEW-FUDS PRP/HTRW PROJECT
LAKE ONTARIO ORDNANCE WORKS
DEW-FUDS SITE NO. C02NY0025
21 DECEMBER 2001

<u>ITEM</u>	<u>COSTS (\$000)</u>
Construction Costs	
1) Project Planning/Investigation Report	204.6
2) Negotiation/Potential Litigation	204.6
3) Administration/Review (20% of CWE)	<u>81.8</u>
TOTAL IMPLEMENTATION COST	498.0

DESCRIPTION OF PROPOSED PRP/HTRW PROJECT

Develop Investigation Plan.

Perform historical research/conduct interviews to identify areas of potential interest and to develop site history.

Perform liability analysis to determine contractor/DOD liability.

Prepare site operations and liability analysis report.

Costs are in FY 01/02 dollars.

PROJECT SUMMARY SHEET
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DERP-FUDS PRP/HTRW PROJECT NO. C02NY002509
LAKE ONTARIO ORDNANCE WORKS
LEWISTON/PORTER, NIAGARA COUNTY NEW YORK
SITE NO. C02NY0025
30 JULY 2001

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LEWISTON/PORTER, NIAGARA COUNTY NEW YORK
SITE NO. C02NY0025

operation. Additional reports indicate that AEC stored material around the former LOOW site in buildings, rail cars, a water tower, the former water treatment facilities, and sometimes on the ground. Although it was reported that most of the wastes were eventually shipped to Oak Ridge, TN, some KAPL waste was allegedly burned by Hooker Chemical Co. (AEC's contractor) in the late 1950s. The location of the burn site has not been identified.

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PRP/HTRW PROJECT NO. C02NY002509
LEWISTON/PORTER, NIAGARA COUNTY NEW YORK
SITE NO. C02NY0025

- USACE has conducted numerous sampling events as part of the ongoing RI. Part of the RI process involved cleanup of asbestos material on property owned by The Sommerset Group and CWM were thought to have been the cause of asbestos was reportedly spread around due to these operations. During the sampling events USACE has identified PCBs which were thought to be directly associate with current CWM operations.

It is also noted that the original LOOW INPR (signed 6/15/86) states that SCA has submitted a claim against DOD pursuant to CERCLA (EA has not seen this document). According to the INPR, the claim says SCA has spent more than 50k and it requests that DOD assume all financial responsibility for future investigation costs as well as the cost of removing additional material as may become necessary to prevent or abate the release of hazardous wastes from the site. The INPR also states that Olin and SCA have already undertaken certain cleanup efforts in response to a request by NYDEC (Olin signed a consent decree with CWM and paid for clean up of some areas saying they were partly responsible). In the eligibility determination section of the FDE, it states that contamination was identified at the site which could be DOD responsibility; however, there was not certainty as to whether DOD was solely or jointly responsible; therefore a Remedial Investigation (RI) was recommended to determine the hazards. Based on a review of the information collected since the original INPR, a PRP/HTRW investigation is warranted.

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EPA FORM 2070-12: Attached.

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PRP/HTRW PROJECT NO. C02NY002509
LEWISTON/PORTER, NIAGARA COUNTY NEW YORK
SITE NO. C02NY0025

PROJECT COST SUMMARY: Attached.

DISTRICT POC: Mary K. Foley, CELRB-PE-EE, (716) 879-4417.

PROJECT COST SUMMARY
DERP-FUDS PRP/HTRW PROJECT NO. C02NY002509
LAKE ONTARIO ORDNANCE WORKS
DERP-FUDS SITE NO. C02NY0025
30 JULY 2001

<u>ITEM</u>	<u>COSTS (\$000)</u>
Construction Costs	
1) Project Planning/Investigation Report	204.6
2) Negotiation/Potential Litigation	204.6
3) Administration/Review (20% of CWE)	<u>81.8</u>
TOTAL IMPLEMENTATION COST	498.0

DESCRIPTION OF PROPOSED PRP/HTRW PROJECT

- Develop Investigation Plan.
- Perform historical research/conduct interviews to identify areas of potential interest and to develop site history.
- Perform liability analysis to determine contractor/DOD liability.
- Prepare site operations and liability analysis report.
- Costs are in FY 01 dollars.

PROJECT COST SUMMARY
DERP-FUDS HTRW PROJECT NO. C02NY002509
LAKE ONTARIO ORDNANCE WORKS
GENEVA, CRAWFORD COUNTY, PENNSYLVANIA
DERP-FUDS SITE NO. C03PA0043
28 FEBRUARY 2001

<u>ITEM</u>	<u>COSTS (\$000)</u>
Construction Costs	
1) Project Planning	90.0
2) Site Investigation (field activities and report)	848.9
3) Administration/Review (20% of CWE)	<u>187.8</u>
TOTAL IMPLEMENTATION COST	1,126.7

DESCRIPTION OF PROPOSED HTRW PROJECT

- Develop Work Plan, Site Specific Health and Safety Plan, and Chemical Data QA Plans.
- Perform historical research to identify areas of potential interest such as waste disposal area, burning ground, waste disposal lines, etc.
- Installation of 20 borings to 15 ft. below grade and collection of soil samples.
- Installation of 6 monitoring wells to 35 ft. below grade and collection of soil and groundwater samples.
- Collection of soil samples for onsite analysis using immunoassay methodology.
- Camera survey of waste water lines and process piping.
- Collection of samples from the waste water lines and process piping.
- Installation of test pits and collection of soil samples.
- Analyses of soil and aqueous samples collected during the investigation.
- Preparation of a Site Inspection (SI) Report.
- Costs are in FY 01 dollars.