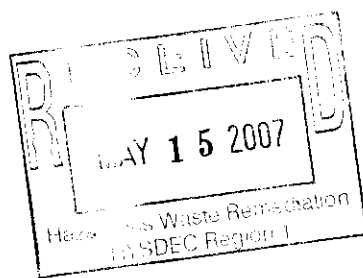
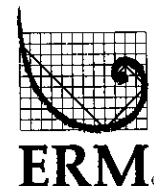


14 May 2007



Suite 210
520 Broad Hollow Road
Melville, NY 11747
(631) 756-8900
(631) 756-8901 (fax)
<http://www.erm.com>

Girish Desai, P.E.
New York State Department of Environmental Conservation
Division of Environmental Remediation
Building 40 - SUNY
Stony Brook, New York 11790-2356



Re: Powers Chemco Site No. 1-30-028
Work Plan for Additional Soil & Groundwater Sampling
Glen Cove, New York

Dear Mr. Desai:

On behalf of Konica Minolta Graphic Imaging USA, Inc., (KMGI), Environmental Resources Management (ERM) is providing this work plan for additional pre-design investigation activities for the above site.

Background

In April 2006, soil and groundwater samples were collected from 14 temporary sampling locations (PZ-01 to PZ-07 and TMP-01 to TMP-07). The groundwater samples were collected from the upper four feet of the saturated zone, and soil samples were collected from above the unsaturated zone. Figure 1 provides a summary of the concentrations of volatile organic compounds (VOCs) in groundwater at these locations, as well as the maximum detected concentrations at other permanent site wells. Based on these results, an area of approximately 0.30 acres is targeted for further groundwater remediation. This area, shown in Figure 1, contained VOC concentrations at 14 locations ranging from 402 micrograms per liter (ug/l) to 483,000 ug/l, with a mean and median concentration of 110,500 ug/l and 26,500 ug/l, respectively. VOCs in unsaturated zone soil marginally exceeded the TAGM No. 4046 Recommended Soil Cleanup Objectives (RSCOs) in 2 of the 14 soil samples (TMP-04 and PZ-06).

On 28 March 2007, the New York State Department of Environmental Conservation (NYSDEC) and KMGI met to discuss the overall status of the site and how to address these remaining VOCs. During that meeting, NYSDEC requested that KMGI perform additional soil and groundwater sampling to:

Girish Desai, P.E.
New York State Department of Environmental Conservation
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14 May 2007
Page 2

- Determine the extent of off-site groundwater VOCs above the Class GA Groundwater Quality Standards (GWQS); and
- Identify source material contributing to the very high groundwater VOC concentrations through collection of soil samples from the unsaturated and saturated zone. This sampling program should identify the extent of VOCs both horizontally and vertically.

In an effort to reduce the potential need to collect additional groundwater delineation samples and/or pre-design data subsequent to this investigation, KMGI also proposes collection of soil and groundwater samples to:

- Delineate groundwater VOCs above the GWQS, particularly to the northeast and east of the target remediation area;
- Fill large gaps between groundwater sampling points;
- Determine the vertical extent of VOCs above the GWQS in the target remediation area through installation of two vertical profile borings; and
- Assess groundwater flow direction and velocity by analyzing groundwater samples for fluorescent dyes injected in October 2005.

It is anticipated that at the conclusion of this investigation, sufficient data will be available to allow KMGI to proceed with preparation of a supplemental remedial action plan to address impacts in the target area (as refined following this investigation). Upon satisfactory completion of the supplemental remedial action, KMGI will adopt institutional controls, subject to NYSDEC review and approval, to conclude the remedial action, and facilitate a change to a Class V designation, as per the Inactive Hazardous Waste Site Program.

Scope of Work

ERM will collect groundwater and soil samples, as described in the following sections, using a direct-push drill rig. Prior to any intrusive work, a private utility locating firm will utilize geophysical methods to identify any utility lines within a ten-foot radius of all proposed drilling locations. Also, as required by law, a public utility mark-out will be conducted.

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New York State Department of Environmental Conservation
Division of Environmental Remediation
14 May 2007
Page 3

On-site Groundwater Sampling

A total of twelve (12) groundwater samples will be collected for laboratory analysis, using a temporary well screen from the upper four feet of the saturated zone. The locations of these temporary wells (TMP-08 to TMP-19) are provided in Figure 2.

Initially, continuous soil samples will be collected from the ground surface to a depth of approximately four feet below the water table (estimated at 5 to 8 feet below ground surface). Soil cores will be collected in four-foot intervals. The cores will be screened visually and with a photo-ionization detector (PID) in one-foot intervals, and boring logs will be prepared. Upon reaching the water table, a four-foot screen will be driven into the saturated zone for collection of a groundwater sample.

The samples will be analyzed for Target Compound List (TCL) VOCs. After sampling at each location, the borings will be sealed with non-shrinking grout and the top of the bore hole will be finished to match the surrounding grade.

Off-site Groundwater Sampling

During the April 2006 investigation, VOCs were detected in groundwater between 159 and 585 ug/l at the northern property boundary of the site. Although soil gas samples collected in January and April 2005 from along this northern boundary did not indicate VOCs at levels that would suggest impacts to nearby residences, a vapor sampling program was recently completed at residences along The Place. The vapor sampling program included indoor air, ambient air, and sub-slab vapor samples. The findings suggest that groundwater containing VOCs along the northern property boundary has not migrated in this direction. Therefore, to delineate the northern extent of VOCs in groundwater, eight (8) sampling locations will be installed as shown in Figure 3. Seven sampling locations will be spaced evenly along The Place, and one location, TMP-OS-05, will be located further north on Elwood Street to provide a point where VOCs are anticipated to be less than the GWQS. Three locations (PZ-08 to PZ-10) will be piezometers, which will be left in place to allow for future water level measurements. Because these points will be located in public roadways, road opening permits will be required.

Girish Desai, P.E.
New York State Department of Environmental Conservation
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Page 4

The same procedures that were used for the on-site temporary groundwater monitoring points will be used for the off-site sampling locations. The piezometers (PZ-08 to PZ-10) will be installed after collection of the groundwater samples. The one-inch diameter PVC piezometers will be installed with eight-foot PVC screens. The top of the screen will be placed two feet above the water table to account for water table fluctuations.

The samples will be analyzed for Target Compound List (TCL) VOCs. After sampling at each location, the borings will be sealed with non-shrinking grout and the top of the bore hole will be finished to match the surrounding grade.

Soil Sampling

Figure 4 presents the location of twenty (20) soil borings. Nine (9) of the borings are located within the targeted remediation area in order to detect any remaining source material contributing to the elevated concentrations of groundwater in this area (as discussed under Vertical Profiles below, soil samples will also be collected from two vertical profiles borings from within this area). The remaining soil samples will be collected from the edge of the targeted remediation area to locate any other pockets of remaining source material and provide horizontal delineation for the extents of the impacted area that could be contributing to elevated VOCs in groundwater.

Continuous soil samples will be collected in four-foot intervals from the ground surface to an unspecified depth following the procedures below. The cores will be screened visually and with a PID in one-foot intervals, and boring logs will be prepared. At each location, three samples will be collected over a one-foot interval as follows:

Unsaturated zone: If any unsaturated soil exhibits signs of obvious impacts (i.e., staining, strong odor, and/or elevated PID readings), a sample will be collected for analysis from the most highly impacted interval. Otherwise, a sample will be collected from two-feet above the historic high water table.

Girish Desai, P.E.
New York State Department of Environmental Conservation
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14 May 2007
Page 5

Water Table: If any saturated soil exhibits signs of obvious impacts (i.e., staining, strong odor, and/or elevated PID readings), a sample will be collected for analysis from the most highly impacted interval. Otherwise, a sample will be collected from two-feet below the current water table.

Deep: Continuous soil samples will be collected until there is no evidence of obvious impacts. If there is no obvious change between soil conditions near the water table, and at deeper locations, then a sample will be collected for analysis from 15 feet below the current water table.

The samples will be analyzed for Target Compound List (TCL) VOCs. After sampling at each location, the borings will be sealed with non-shrinking grout and the top of the bore hole will be finished to match the surrounding grade.

Vertical Profiles

Figures 2 and 4 present the proposed location for two vertical profile soil borings. At each of these borings, a direct push drill rig fitted with a discrete groundwater sampler (18 inches in length) that will be used to collect five groundwater samples at varying depths. The top of each sampling interval will be at the following approximate depths: water table, 15 feet, 25 feet, 35 feet, and 45 feet.

Immediately adjacent to the two groundwater sampling points, soil samples will be collected continuously from grade to a depth of 48 feet. The soil samples will be logged and screened with a PID. Based on the results of the field screening and visual observation of the samples, samples will be selected for analysis as noted in the Table 1. These data will be used for further evaluation of potential remedial technologies (e.g., soil excavation with off-site disposal or on-site treatment; in-situ soil mixing with application of an oxidant; in-situ thermal heating; chemical oxidation; and enhanced biodegradation; and combinations thereof) as pre-design information for a selected remedy. Table 1 provides the rationale and locations for each soil sample.

Dye tracer analysis

A round of groundwater samples will be collected from approximately 40 site air injection wells (AIWs), vapor recovery wells (VRWs), piezometers, and temporary groundwater sampling points. These wells will be analyzed

Girish Desai, P.E.
New York State Department of Environmental Conservation
Division of Environmental Remediation
14 May 2007
Page 6

for the presence of the dyes that were injected in October 2005 as part of the dye tracer study. The purpose of this study was to collect information on groundwater flow rates and directions for use in the final design of the remedy for this area. The injected dyes were just becoming detected in downgradient monitoring points during the last round of sampling in May 2006. The dye trace samples will be analyzed directly by ERM.

Water Level Measurement

Approximately two weeks after installation of the piezometers, water levels from the piezometers, and other site wells, will be collected and used to prepare a map showing groundwater elevations beneath the site, and along The Place.

Surveying

A New York State-licensed surveyor will be utilized to locate all new sampling locations on the existing base map, and to provide measuring point elevations for the three new piezometers.

Health & Safety

All site activities will be performed in accordance with ERM's Health & Safety Guidance Manual, and the task-specific Project Health & Safety Plan.

Laboratory Analysis & Reporting


During the sampling activities, duplicate, trip and field blank rinse samples will be collected. All soil and groundwater samples (except oxidant demand and dye tracer samples) will be analyzed by Accutest Laboratories in Dayton, New Jersey (a NYSDOH ELAP-certified laboratory) for the parameters noted in the above sections and in Table 1. Upon receipt, analytical data for the delineation of VOCs will be validated by a third party - Environmental Data Services. Waste classification and other pre-design data will not be validated. ERM will prepare a report for submission to NYSDEC that will include: 1) a summary table of all sampling results, 2) a surveyed site map showing the location of all

Girish Desai, P.E.
New York State Department of Environmental Conservation
Division of Environmental Remediation
14 May 2007
Page 7

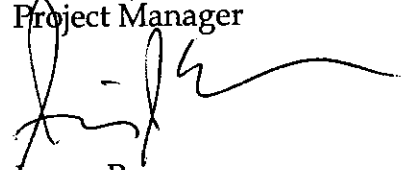
sampling points, and detections of VOCs, 3) soil boring logs, and 4) water level contour map showing groundwater flow direction.

Please review this document, and if you have any questions, please do not hesitate to contact us at (631) 756-8900. Once we receive your approval, we will proceed with the investigation activities.

Very truly yours,



John Mohlin, P.E.
Project Manager



James Rocco
Principal

Attachments

cc: David Pasquini, Ph.D. (KMGI)
Steve Schuster (KMGI)
Walter Parish (NYSDEC)
Don Miles (NYSDOH)

ELWOOD STREET

THE PLACE

CONC. CURB

CONC. CURB



MW-12

GRASS AREA
X-CHAIN LINK FENCE
GRASS AREA

PRELIMINARY TARGET AREA FOR GROUNDWATER REMEDIATION (APPROX. 13,424 SQ. FT)

EDGE OF PAVEMENT

EDGE OF PAVEMENT

THE PLACE

TMP-07 163 ug/l APRIL 2006

MW-04
PZ-03 APRIL 2006

PZ-02 310 ug/l APRIL 2006
TMP-02 174 ug/l APRIL 2006
AIW-701 16,370 ug/l SEPT. 2005

TMP-03 369,150 ug/l APRIL 2006

AIW-702 35,290 ug/l SEPT. 2005

PZ-04 92,986 ug/l APRIL 2006

AIW-703 SEPT. 2005

PZ-01 197 ug/l APRIL 2006

PZ-06 277,870 ug/l APRIL 2006

TMP-06 24,965 ug/l APRIL 2006

PZ-05

TMP-01 159 ug/l APRIL 2006

TMP-04 8,382 ug/l APRIL 2006

VRW-202 28,003 ug/l SEPT. 2003

TMP-05 482,953 ug/l APRIL 2006

VRW-203 189,900 ug/l SEPT. 2005

VRW-204 54 ug/l SEPT. 2005

WRW-304

WRW-305

WRW-306

WRW-307

PZ-07 585 ug/l APRIL 2006

WRW-301

WRW-302

AIW-706 1,253 ug/l SEPT. 2005

AIW-707 402 ug/l SEPT. 2005

AIW-708 54 ug/l SEPT. 2005

AIW-709 139 ug/l SEPT. 2005

1 STORY CONCRETE BLOCK BUILDING

ASPHALT PARKING AREA

ASPHALT DRIVE

WRW-308

WRW-310

WRW-311

WRW-312

WRW-313

WRW-314

WRW-315

WRW-316

MW-01

VRW-205 SEPT. 2005

VRW-206 SEPT. 2005

WRW-317

WRW-318

VRW-207 22 ug/l SEPT. 2005

VRW-208 SEPT. 2005

WRW-319

WRW-320

WRW-316

AIW-710 SEPT. 2005

WRW-319

AIW-711 SEPT. 2005

WRW-321

WRW-322

AIW-712 2,238 ug/l SEPT. 2003

AIW-713 SEPT. 2005

AIW-714 117 ug/l SEPT. 2003

WRW-316

WRW-319

VRW-209 SEPT. 2005

WRW-323

VRW-210 SEPT. 2005

WRW-324

WRW-325

WRW-326

WRW-327

WRW-316

WRW-319

WRW-320

WRW-321

WRW-322

WRW-323

WRW-324

WRW-325

WRW-326

WRW-316

WRW-319

WRW-320

WRW-321

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WRW-319

WRW-320

WRW-321

WRW-322

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WRW-325

WRW-326

WRW-316

WRW-319

WRW-320

WRW-321

WRW-322

WRW-323

WRW-324

WRW-325

WRW-326

TREATMENT BUILDING

POND

TIMBER CURB

MW-05 SEPT. 2003

VRW-211 SEPT. 2005

VRW-212 11 ug/l SEPT. 2005

WRW-327

WRW-328

AIW-717 SEPT. 2005

AIW-718 SEPT. 2005

WRW-327

WRW-328

AIW-717 SEPT. 2005

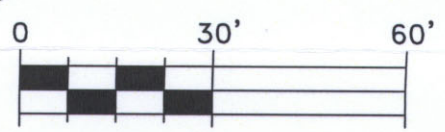
AIW-718 SEPT. 2005

WRW-327

WRW-328

AIW-717 SEPT. 2005

AIW-718 SEPT. 2005



GRAPHIC SCALE

MW-03R

MW-06

NOTES:

WELLS INDICATED IN BLUE DO NOT CONTAIN VOCs ABOVE THE GWQS.

WELLS INDICATED IN GREEN CONTAIN ONE OR MORE VOCs ABOVE THE GWQS. TOTAL VOC CONCENTRATION IS LESS THAN 100 PPB.

WELLS INDICATED IN ORANGE CONTAIN ONE OR MORE VOCs ABOVE THE GWQS. TOTAL VOC CONCENTRATION IS BETWEEN 100 PPB AND 1000 PPB.

WELLS INDICATED IN RED CONTAIN ONE OR MORE VOCs ABOVE THE GWQS. TOTAL VOC CONCENTRATION IS >1000 PPB.

GWQS NEW YORK STATE CLASS GA GROUNDWATER QUALITY STANDARDS

LEGEND

- MONITORING WELL
 - PIEZOMETER
 - PASSIVE AIR INJECTION WELL
 - VAPOR RECOVERY WELL
 - △ WATER RECOVERY WELL
 - TEMPORARY SOIL AND GROUNDWATER SAMPLING POINT
 - SAMPLE LOCATION WITH MAXIMUM TOTAL VOC CONCENTRATION IN GROUNDWATER SINCE SHUTDOWN AND DATE
- PZ-05
189,900 ug/l
APRIL 2006

TITLE

MAXIMUM DETECTED VOC CONCENTRATIONS IN GROUNDWATER POWERS CHEMCO SITE, GLEN COVE, NEW YORK

PREPARED FOR

CONCENTRATIONS IN GROUNDWATER CARBON COMPANY DISPOSAL SITE

Environmental Resources Management ERM	SCALE	FIGURE
	GRAPHIC	1
DRAWN: EMF/JPM	JOB NO.: 0006435.3	DATE: 4/26/07
	FILE NAME: 0006435-03-005	

ELWOOD STREET

THE PLACE

CONC. CURB

CONC. CURB

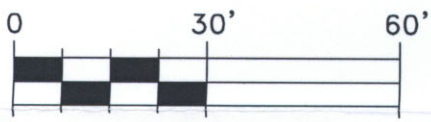
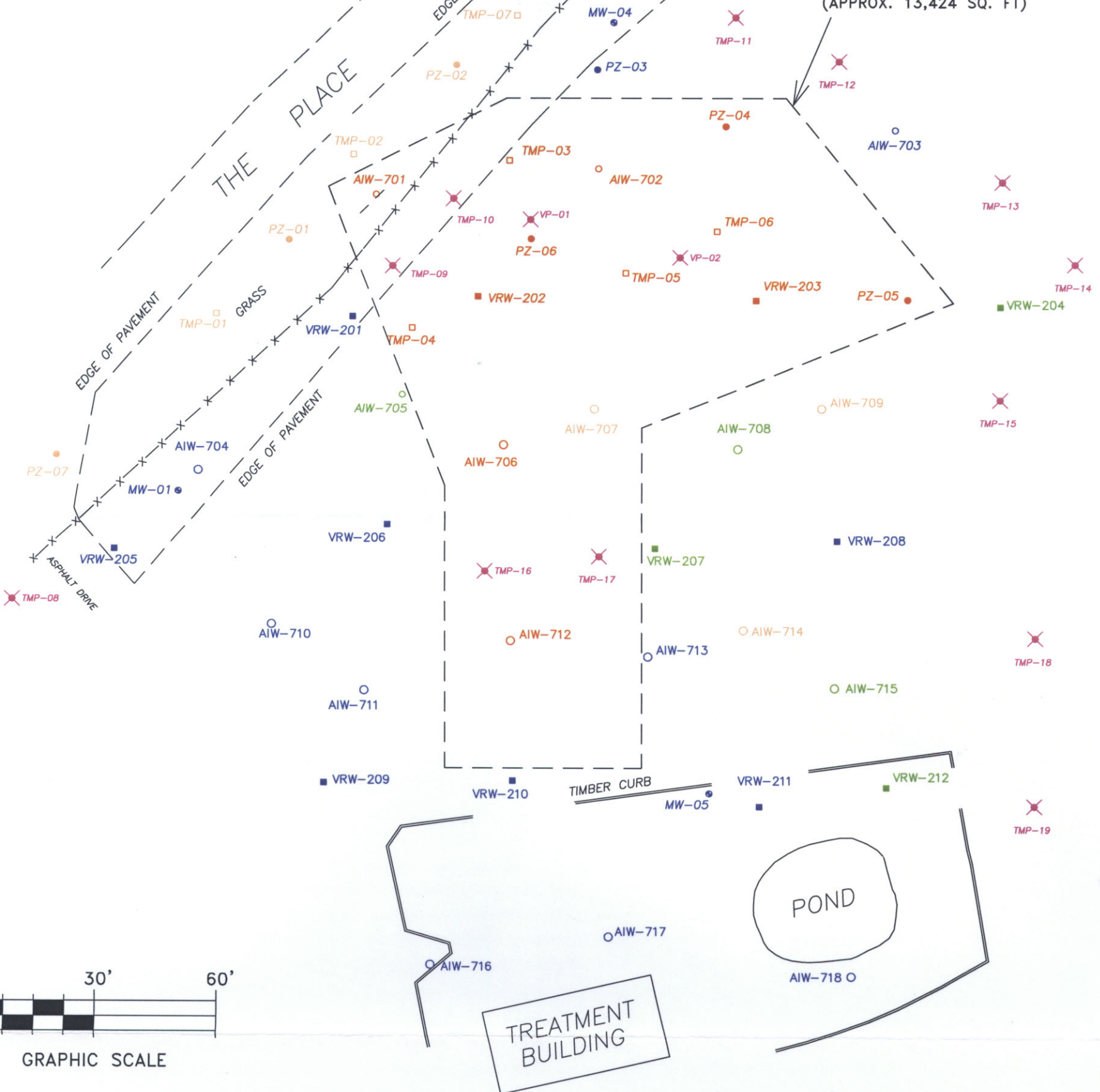


MW-12

GRASS AREA
X-CHAIN LINK FENCE
GRASS AREA

CONC. CURB

PRELIMINARY TARGET AREA FOR
GROUNDWATER REMEDIATION
(APPROX. 13,424 SQ. FT)



GRAPHIC SCALE

LEGEND

- MONITORING WELL
- PIEZOMETER
- PASSIVE AIR INJECTION WELL
- VAPOR RECOVERY WELL
- TEMPORARY SOIL AND GROUNDWATER SAMPLING POINT
- ✕ TMP-08 PROPOSED TEMPORARY SOIL/GROUNDWATER SAMPLING POINT
- ✕ VP-01 PROPOSED VERTICAL PROFILE LOCATION

NOTES:

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WELLS INDICATED IN RED CONTAIN ONE OR MORE VOCs ABOVE THE GWQS. TOTAL VOC CONCENTRATION IS >1000 PPB.

GWQS NEW YORK STATE CLASS GA
GROUNDWATER QUALITY STANDARDS

TITLE		
PROPOSED ON-SITE TEMPORARY GROUNDWATER SAMPLING LOCATIONS POWERS CHEMCO SITE, GLEN COVE, NEW YORK		
PREPARED FOR KONICA MINOLTA GRAPHIC IMAGING USA, INC.		
Environmental Resources Management ERM	SCALE GRAPHIC	FIGURE 2
DATE 5/14/07	JOB NO. 0006435.3	FILE NAME 0006435-03-003
DRAWN: EMF/JPM		



PRELIMINARY TARGET AREA FOR
GROUNDWATER REMEDIATION

LEGEND

- TMP-OS-01 ● PROPOSED TEMPORARY OFF-SITE
GROUNDWATER SAMPLING POINT
- PZ-08 ○ PROPOSED PIEZOMETER

● SAMPLE LOCATION WHERE GROUNDWATER
VOC LEVELS ARE BELOW CLASS GA GWQS



TITLE		OFF-SITE GROUNDWATER SAMPLE LOCATIONS	
PREPARED FOR		KONICA MINOLTA GRAPHIC IMAGING USA, INC.	
DRAWN		JOB NO.:	FILE NAME:
ERM	JPM	0006435-03	0006435-03-002
SCALE		GRAPHIC	FIGURE
			3
		DATE	4/26/07

ELWOOD STREET

THE PLACE

CONC. CURB

CONC. CURB



MW-12

GRASS AREA
CHAIN LINK FENCE

GRASS AREA

EDGE OF PAVEMENT

PRELIMINARY TARGET AREA FOR
GROUNDWATER REMEDIATION
(APPROX. 13,424 SQ. FT)

EDGE OF PAVEMENT

MW-04

TMP-07

SB-01

PZ-02

PZ-03

SB-02

THE PLACE

TMP-02

AIW-701

SB-12

SB-13

AIW-702

SB-14

TMP-03

VP-01

SB-17

PZ-04

AIW-703

SB-15

SB-16

VP-02

TMP-06

PZ-06

VRW-202

TMP-05

SB-20

VRW-203

SB-18

PZ-05

SB-03

VRW-204

SB-04

VRW-201

TMP-04

AIW-705

SB-09

AIW-706

SB-19

AIW-707

AIW-708

AIW-709

SB-04

SB-10

PZ-07

AIW-704

MW-01

VRW-205

ASPHALT DRIVE

EDGE OF PAVEMENT

GRASS

EDGE OF PAVEMENT

VRW-206

AIW-710

SB-08

AIW-711

VRW-209

AIW-712

SB-06

VRW-207

AIW-713

AIW-714

AIW-715

VRW-208

VRW-210

TIMBER CURB

MW-05

VRW-211

VRW-212

AIW-716

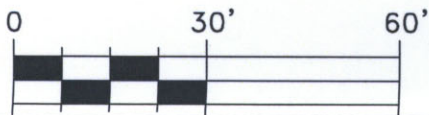
AIW-717

AIW-718

POND

TREATMENT BUILDING

MW-03R



GRAPHIC SCALE

LEGEND

- MONITORING WELL
- PIEZOMETER
- PASSIVE AIR INJECTION WELL
- VAPOR RECOVERY WELL
- TEMPORARY SOIL AND GROUNDWATER SAMPLING POINT
- ✕ VP-01 PROPOSED VERTICAL PROFILE LOCATION
- ✕ SB-08 PROPOSED SOIL BORING

NOTES:

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WELLS INDICATED IN ORANGE CONTAIN ONE OR MORE VOCs ABOVE THE GWQS. TOTAL VOC CONCENTRATION IS BETWEEN 100 PPB AND 1000 PPB.

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GWQS NEW YORK STATE CLASS GA GROUNDWATER QUALITY STANDARDS

TITLE		
PROPOSED SOIL SAMPLING LOCATIONS POWERS CHEMCO SITE, GLEN COVE, NEW YORK		
PREPARED FOR KONICA MINOLTA GRAPHIC IMAGING USA, INC.		
Environmental Resources Management ERM	SCALE GRAPHIC	FIGURE 4
DRAWN: EMF/JPM	JOB NO.: 0006435.3	FILE NAME: 0006435-03-004
	DATE: 5/14/07	

TABLE 1
Sampling and Analysis Plan for Vertical Profile Borings
Konica Minolta, Glen Cove, New York

Parameter	Matrix	Field Samples	Comments
TCL VOCs	GW	10	Vertical delineation - 5, 15, 25, 35, 45 ft
TCLP - all parameters	Soil	2	Waste characterization for disposal purposes - most visually impacted
Corrosivity	Soil	2	Waste characterization for disposal purposes - most visually impacted
Reactivity	Soil	2	Waste characterization for disposal purposes - most visually impacted
Ignitability	Soil	2	Waste characterization for disposal purposes - most visually impacted
TCL VOCs	Soil	6	Locate remaining source material and waste characterization for disposal purposes - saturated zone, water table, and deep
PAHs	Soil	2	Waste characterization for disposal purposes - most visually impacted
PCBs	Soil	2	Waste characterization for disposal purposes - most visually impacted
TAL metals plus cyanide	Soil	2	Waste characterization for disposal purposes - most visually impacted
Grain size distribution	Soil	6	Evaluate vertical permeability - water table, 20 ft, 40 ft
Total organic carbon (TOC)	Soil	2	Help determine oxidant requirements - most visually impacted
Oxidant demand test - 1st sample	Soil	1	Determine oxidant requirements - most visually impacted from VP-01
Oxidant demand test - 2nd sample	Soil	1	Determine oxidant requirements - most visually impacted from VP-02
<u>Biodegradation Parameters</u>			
Carbon dioxide	GW	10	Assess biodegradation potential - 5, 15, 25, 35, 45 ft
Methane	GW	10	Assess biodegradation potential - 5, 15, 25, 35, 45 ft
Nitrate	GW	10	Assess biodegradation potential - 5, 15, 25, 35, 45 ft
Sulfate	GW	10	Assess biodegradation potential - 5, 15, 25, 35, 45 ft
Ferrous iron	GW	10	Assess biodegradation potential - 5, 15, 25, 35, 45 ft
pH	GW	10	Field analyses - assess biodegradation potential - 5, 15, 25, 35, 45 ft
ORP	GW	10	Field analyses - assess biodegradation potential - 5, 15, 25, 35, 45 ft
Conductivity	GW	10	Field analyses - assess biodegradation potential - 5, 15, 25, 35, 45 ft
Dissolved oxygen (DO)	GW	10	Field analyses - assess biodegradation potential - 5, 15, 25, 35, 45 ft
Heterotrophic plate count	Soil	4	Confirm sufficient soil bacteria present - most visually impacted and moderately impacted from saturated zone

GW = groundwater