

CA RICH
ENVIRONMENTAL SPECIALISTS

SITE MANAGEMENT PLAN

**Tishcon Corporation
30 - 36 New York Avenue and 31 - 33 Brooklyn Avenue
Westbury, New York
Site Number: 130043E**

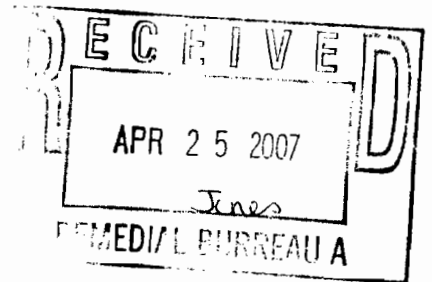
April 2007

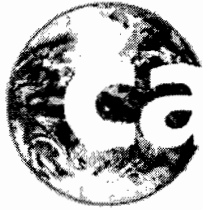
Prepared for:

**Tishcon Corporation
30 New York Avenue
Westbury, New York 11590**

Prepared by:

**CA Rich Consultants, Inc.
17 Dupont Street
Plainview, NY 11803**





CA RICH
ENVIRONMENTAL SPECIALISTS

April 18, 2007

NYSDEC

625 Broadway
Albany, New York 12233-7014

Attention: Joseph Jones

**Re: Site Management Plan
Tishcon Corporation
30 - 36 New York Ave. and 31 - 33 Brooklyn Ave.
Westbury, New York
NYSDEC Site No.: 130043E / Tishcon File# 75**

Dear Mr. Jones:

Attached is a copy of our Site Management Plan for the above- referenced Site.

As the termination criteria for the on-site wells have been achieved, the on-site AS/SVE system has been turned off since May 30, 2006. The Second Quarter 2007 will mark one year since the on-site AS/SVE system has been turned off. Quarterly monitoring since that time has not revealed any significant increase in the concentration of 1,1,1-TCA in the groundwater collected from the on-site wells. As such, the monitoring of the on-site compliance wells will be discontinued. Monitoring of the upgradient and downgradient wells will continue while the off-site AS/SVE system remains in operation.

The off-site extension of the AS/SVE system remains in operation. Maintenance and monitoring of this system will continue in accordance with our OM&M Plan. This document presents a summary of the institutional and engineering controls developed for this Site and establishes inspection procedures to ensure their proper implementation.

If there are any questions regarding this Plan, please do not hesitate to call our Office.

Sincerely,

CA RICH CONSULTANTS, INC.

Eric A. Weinstock
Vice President

cc: Paul Aufrichtig, Esq.
Lawrence Schnapf, Esq.
Kamal Chopra
Joe Elbaz
Alali Tamuno, Esq.
Richard Fedigan

SITE MANAGEMENT PLAN

**Tishcon Corporation
30 - 36 New York Avenue and 31 - 33 Brooklyn Avenue
Westbury, New York
Site Number: 130043E**

1.0 Introduction & Background

The following Site Management Plan has been prepared by CA RICH Consultants, Inc. (CA RICH) on behalf of the Tishcon Corporation (Tishcon). For the purposes of this document, the contaminants of concern are 1,1,1-trichloroethane (1,1,1-TCA) and its degradation products.

During the summer of 1996, a Focused Remedial Investigation (R.I.) for soil contamination and identification of source areas was performed. Based on the results of the initial R.I., an Interim Remedial Measure (IRM) was performed to remove contaminated soil from two on-site storm drains and from the bottom of an out-of-service cesspool.

A second Remedial Investigation was performed during 1998. Concurrent with the Remedial Investigation, a Remedial Design Investigation was performed to collect additional subsurface information for the layout of the on-site remediation system. A follow-up phase of the remedial investigation was performed during June of 1999. A map illustrating the location of the site wells is included as Figure 1.

Installation of the on-site remediation system began during August 1999 and consisted of the installation of the Soil Vapor Extraction (SVE) wells and Air Sparging (AS) points. The installation of the underground piping, the SVE blower and the air sparging compressor was completed during December 1999. An off-site extension of the system was placed into operation in August 2004. A layout of the SVE wells and AS points is presented on Figure 2.

The Final Engineering Report for the treatment system indicated that the AS system would remain in operation until the groundwater samples from the compliance wells: 1) meet the SCGs for TCA and its degradation products; 2) the data shows that TCA and its degradation products have reached an asymptotic condition and is no longer effectively removing the contaminants of concern; or, 3) the on-site and down-gradient groundwater contamination is at or less than the up-gradient groundwater contamination at the time of re-evaluation. It also stated that once the levels of total VOCs in the SVE wells decrease to a near constant or asymptotic concentration, operation of the SVE system would be suspended. These criteria were achieved during the Spring of 2006 and the on-site portion of the AS/SVE system was turned off on May 30, 2006. The off-site extension of the system remains in operation.

A soil vapor intrusion Investigation Work Plan was submitted to the NYSDEC for approval in November, 2006 and revised to address NYSDOH comments in February 2007. The proposed scope of work includes the installation of permanent, clustered soil vapor points in four locations. The depths of the clustered points will be approximately at 45 feet, 25 feet, and 8 feet below grade. As of the date of this report we have not received a letter indicating that the work plan is approved and that we should proceed.

The following documents prepared for this site should be reviewed for additional details:

- CA RICH, November 1995, Focused Remedial Investigation Work Plan, Sampling and Analysis Plan and Health and Safety Plan;
- CA RICH, May 1997, Final Focused Remedial Investigation Report;
- CA RICH, November 1997, Focused Remedial Investigation Work Plan for On-Site Groundwater;
- CA RICH, April 1998, Final Interim Remedial Measures Report;
- CA RICH, July 1998, Remedial Design Investigation Work Plan;
- CA RICH, July 1999, Final Remedial Investigation Report for On-Site Groundwater;
- CA RICH, August 1999, Remedial Design Report;
- CA RICH, March 2000, Final Engineering Report and Operations & Maintenance Manual, Soil Vapor Extraction and Air Sparging System;
- CA RICH, November 2004, Final Engineering Report and Operations & Maintenance Manual, On-Site and Off-Site Soil Vapor Extraction and Air Sparging System;
- CA RICH, July 2006, On-Site Air Sparging/Soil Vapor Extraction System Closure Report; and
- CA RICH, February 2007, On-Site and Limited Off-Site Soil Vapor Intrusion Investigation Work Plan.

2.0 Operations and Maintenance of Existing Equipment

2.1 Remediation Process and Equipment

As described in Section 1.0, the off-site portion of the AS/SVE system remains in operation. The components of the off-site system consist of four SVE/AS well couplets located along New York Avenue and Old Country Road. The three AS points at the downgradient site property line and their associated SVE wells also remain in operation. The soil vapor is extracted using a Fuji Model VFC604A-7W, 4½-horsepower blower located in the equipment shed. The soil vapor passes through a moisture knock-out drum, into the blower and flows through a series of two, 150 pound, vapor-phase carbon units located outside of the shed. Air sparging is achieved using a Curtis-Toledo™ model KS20, 20-horsepower Belt Driven Rotary Screw Compressor.

2.2 Maintenance Procedures

General

As described in the Operations, Maintenance and Monitoring (OM&M) Plan (Ref. 10) the door to the equipment shed should be opened once a day on Monday through Friday and a brief check should be performed for possible air leaks, vacuum leaks, excessive temperatures, freezing conditions or other equipment related issues.

Air Compressor

The air compressor should be inspected on the following basis.

Daily

- Check lubricant level. Fill as needed.
- Drain condensate from air receiver.
- Check pressure reading to insure proper operating point.
- Check controls for proper operation.

Weekly

- Inspect air filter element.
- Drain condensate from sump.
- Check pressure relief valve.
- Check for oil leaks, loose fasteners & connections and inspect hoses.

After initial 30 days or 100 operating hours

- Change oil filter element

Every 6 Months or 1000 hours

- Change oil filter element.
- Inspect air filter element.
- Check belts and hoses for signs of wear.
- Clean motor and ventilation openings.
- Test high temperature shut down switch.

Yearly or after 2000 operating hours

- Change oil filter element.
- Change air filter element.
- Change compressor oil.
- Grease motor bearings.
- Change air/oil separator.
- Check V-belt alignment.

Coalescing Oil-Removal Filter

- Check filter service indicator weekly. Replace filter element when indicator changes from green to red.
- This is a self draining unit, no other maintenance is required.

Pressure Regulators

- There are no periodic maintenance procedures recommended by the manufacturer.

SVE Blower (Ring Compressor)

Weekly

- Check vacuum gauge at inlet and record value.

Monthly

- Clean the inside and outside of the cooling fan

Moisture Knock-Out Drum

- The water level in the drum should be checked once a month. Turn off the power to the blower using the circuit breakers marked in the electric panel, place a container in front of the drain valve at the bottom of the drum and open the drain valve. If water flows out of the drum, the drum should be drained and the water stored in a suitable plastic container with a water-tight lid. The system can then be restarted. Contact CA RICH to arrange for the proper disposal of the water.
- The moisture knock-out drum contains an air filter to prevent sediment from entering the blower. The filter should be checked every 6 months or after a significant increase in the measured vacuum at the inlet to the blower. The filter element should be either cleaned or replaced depending on the condition of the element.

Vacuum Relief Valve

- There are no periodic maintenance procedures recommended by the manufacturer.

Carbon Canisters

- The sampling ports on the discharge side of the blower should be monitored quarterly using an HNU meter and the values recorded. Once the meter indicates breakthrough of the carbon, CA RICH should be contacted to arrange for replacement of the unit.
- There are no periodic maintenance procedures recommended by the manufacturer.

Exhaust Fan

- Lubricate motor every six months using SAE 20 non-detergent oil. Insert 2-3 drops of oil in the oiling hole on the back plate of the motor.

Timer

- There is no periodic maintenance required for the timer as specified by the manufacturer. If there is a power outage, check that the clock is operating properly.

3.0 Monitoring

The following monitoring programs have been established in the Operations, Maintenance and Monitoring Plan (Ref. 10) and include: groundwater monitoring and soil vapor monitoring.

3.1 Groundwater Monitoring

During the course of work at this site, numerous wells were installed at different points in time. For the purposes of this Report, the groundwater analytical results from the November 1998 Remedial Investigation will serve as a starting point with regard to plotting the data versus time. As part of the Remedial Design, a series of compliance wells were designated. A map illustrating the locations of these wells is presented on Figure 1. The network of compliance wells consists of the following:

Upgradient

- AIMW-11A
- AIMW-11B

On-Site

- TW-1
- MDCW-1S
- MDCW-1I
- MDCW-1D
- NC-24

Downgradient

- MDCW-2S
- MDCW-2I
- MDCW-2D
- MDCW-3S
- MDCW-3I
- MDCW-3D

The Second Quarter 2007 will mark one year since the on-site AS/SVE system has been turned off. Quarterly monitoring since that time has not revealed any significant increase in the concentration of 1,1,1-TCA in the groundwater collected from the on-site wells. As such, the monitoring of the on-site compliance wells will be discontinued. Monitoring of the upgradient and downgradient wells will continue while the off-site AS/SVE system remains in operation.

Three casing volumes of groundwater will be purged from each of these wells using a Grundfos™ groundwater sampling pump. Two 40-mil vials will then be filled directly from the pump discharge and placed in a cooler with ice packs. The purge water will be containerized and sampled prior to discharge in a drain connected to the NCDPW sewer system.

3.2 Soil Vapor

One soil vapor sample will be collected from the SVE blower discharge using a SUMMA canister and analyzed for via EPA Method TO-15. The SUMMA canister will be connected to a sample port located between the blower discharge and the first carbon unit. In addition to the SUMMA canister sample, field readings are also measured using an HNU with an 11.7ev bulb. Extracted soil vapor samples will continue to be collected on a quarterly basis while the off-site system remains in operation.

4.0 Institutional and Engineering Controls (I&ECs)

The goal of the I&EC portion of this Plan is to describe the procedures that will be employed to manage the institutional and engineering controls for the Site. Specifically, this Plan addresses the following issues:

- Contemplated Use;
- Institutional Controls / Engineering Controls (IC/ECs);
- An Assurance of the Engineering Controls which are part of the Remedy;
- Certification of the IC/ECs; and
- Provisions for the Continued Use, Reuse or Redevelopment of the Site within the Constraints of the Remedy.

Each of these items is addressed in detail in the following sections of this report.

4.1 Contemplated Use

Tishcon Corporation is located in a commercial and industrial, residential area in Westbury, New York. The reasonable, foreseeable future use of the Tishcon Corporation property is commercial/industrial. Tishcon currently plans to expand the rear portion of the plant by approximately 20 feet in the current parking lot area between the present building footprint and Brooklyn Avenue.

4.2 Institutional Controls

The following institutional controls for this site will be implemented by the property owner: 1) a deed notification and 2) groundwater beneath the site cannot be used for potable or industrial purposes without treatment unless first obtaining permission to do so from NYSDEC. The property owner will implement these two institutional controls.

4.3 Engineering Controls

1,1,1 TCA and its degradation products were detected in the underlying soil vapor and groundwater. To address these issues, a mechanical system was installed to serve as an engineering control. This consisted on an on-site system followed by the installation of an off-site extension.

The termination criteria for the operation of the on-site portion of the system have been achieved. This was documented in our On-Site Air Sparging/Soil Vapor Extraction System Closure Report (Ref. 10). The off-site portion of the system will remain in operation until the termination criteria for that portion of the system are met.

4.4 Assurance of the Engineering Controls which are Part of the Remedy

Assurance of the engineering controls developed for this site will be achieved using a combination of site inspections, monitoring, and annual certification. The groundwater and soil vapor will be sampled on a quarterly basis in accordance with the OM&M Plan (Ref. 10). The operation of the AS/SVE system will be inspected and certified on an annual basis by a Professional Engineer (or qualified environmental professional) (see Section 4.5). December of each year will represent the end of a one year certification period. In that regard, the Quarterly Monitoring Reports will also include a certification of the AS/SVE system.

4.5 Certification of the Institutional Controls / Engineering Controls (IC/ECs)

On an annual basis, a professional engineer (or qualified environmental professional) will review this Plan and the most recent monitoring data. The property owner will also be interviewed to confirm that no potable or industrial groundwater supply wells have been installed at the site.

Specifically, the certification will state the ICs and ECs for the project and certify that:

- they are in place and effective;
- they are performing as designed;
- nothing has occurred that would impair the ability of the controls to protect public health and the environment;
- no violations have occurred and there were no failures to comply with the Site Management Plan;
- Site access is available to maintain the engineering controls; and
- there is no groundwater usage at the Site.

4.6 Provisions for the Continued Use, Reuse or Redevelopment of the Site within the Constraints of the Remedy

This Site Management Plan adequately addresses the operational requirements for continued use of the Tishcon Facility. At this time, there are plans for a 20 foot wide expansion of the rear portion of the plant in the area between the building foot print and Brooklyn Avenue. Provisions for the continued use, reuse and potential redevelopment of this Site are addressed below by media.

Soil – If the Tishcon Corporation property is to be redeveloped, soil samples will be collected from the planned excavation areas during construction. The samples will be tested for volatile organic compounds using USEPA 8260. The excavated soil will then be properly disposed of based on the results of the soil samples.

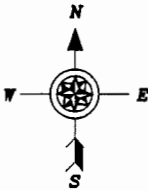
Groundwater – There are currently no future plans to use the groundwater beneath the site either for potable or industrial purposes. The property owner or tenant will not install and operate an on-site supply well unless permission is obtained from NYSDEC in advance.

Soil Vapor – The operation of the current SVE system assures that any remaining 1,1,1-TCA vapors in the subsurface do not enter the interior of the surrounding structures. The procedures for termination of the SVE system are included in the OM&M Plan (Ref. 10).

5.0 REFERENCES

1. CA RICH, November 1995, Focused Remedial Investigation Work Plan, Sampling and Analysis Plan and Health and Safety Plan, Tishcon Corporation, 30-36 New York Avenue and 31-33 Brooklyn Avenue, Westbury, New York.
2. CA RICH, April 1998, Final Interim Remedial Measures Report, Tishcon Corporation, 30-36 New York Avenue and 31-33 Brooklyn Avenue, Westbury, New York.
3. CA RICH, May 1997, Final Focused Remedial Investigation Report, Tishcon Corporation, 30-36 New York Avenue and 31-33 Brooklyn Avenue, Westbury, New York.
4. CA RICH, November 1997, Focused Remedial Investigation Work Plan for On-Site Ground Water, Tishcon Corporation, 30-36 New York Avenue and 31-33 Brooklyn Avenue, Westbury, New York.
5. CA RICH, July 1998, Remedial Design Investigation Work Plan, Tishcon Corporation, 30-36 New York Avenue and 31-33 Brooklyn Avenue, Westbury, New York.
6. NYSDEC, January 24, 1994, Department's Technical And Guidance Memorandum: Determination of Soil Cleanup Objectives and Cleanup Levels.
7. CA RICH, July 1999, Final Remedial Investigation Report for On-Site Groundwater, Tishcon Corporation, 30-36 New York Avenue and 31-33 Brooklyn Avenue, Westbury, New York.
8. CA RICH, August 1999, Remedial Design Report, Tishcon Corporation, 30-36 New York Avenue and 31-33 Brooklyn Avenue, Westbury, New York.
9. CA RICH, March 2000, Final Engineering Report and Operations & Maintenance Manual, Tishcon Corporation, 30-36 New York Avenue and 31-33 Brooklyn Avenue, Westbury, New York.
10. CA RICH, November 2004, Final Engineering Report and Operations & Maintenance Manual for On-Site and Off-Site Soil Vapor Extraction and Air Sparging System, Tishcon Corporation, 30-36 New York Avenue and 31-33 Brooklyn Avenue, Westbury, New York.
11. CA RICH, July 2006, On-Site Air Sparging/Soil Vapor Extraction System Closure Report, Tishcon Corporation, 30 New York Avenue, Westbury, NY, Site No.: 130043E.
12. CA RICH, February 2007, On-Site and Limited Off-Site Soil Vapor Intrusion Investigation Work Plan, Tishcon Corporation, 30 New York Avenue, Westbury, NY, Site No.: 130043E

FIGURES

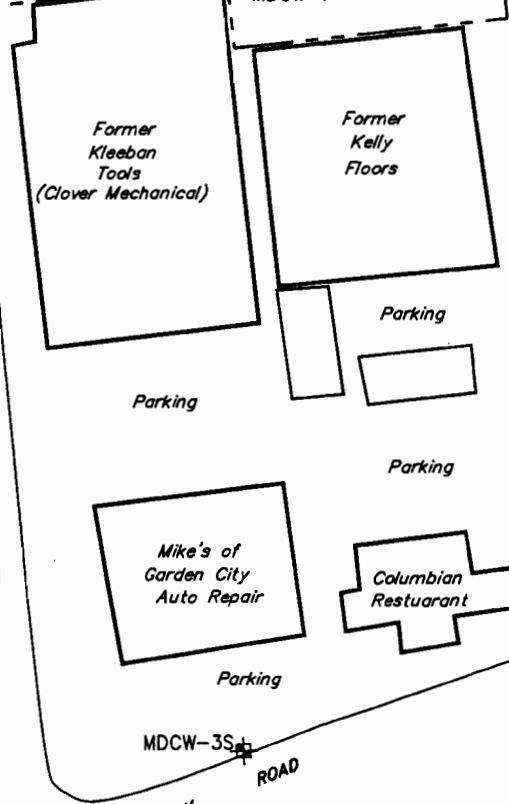
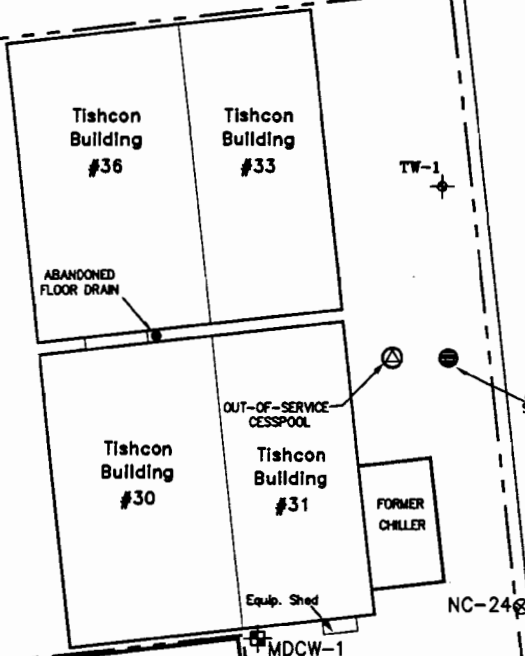
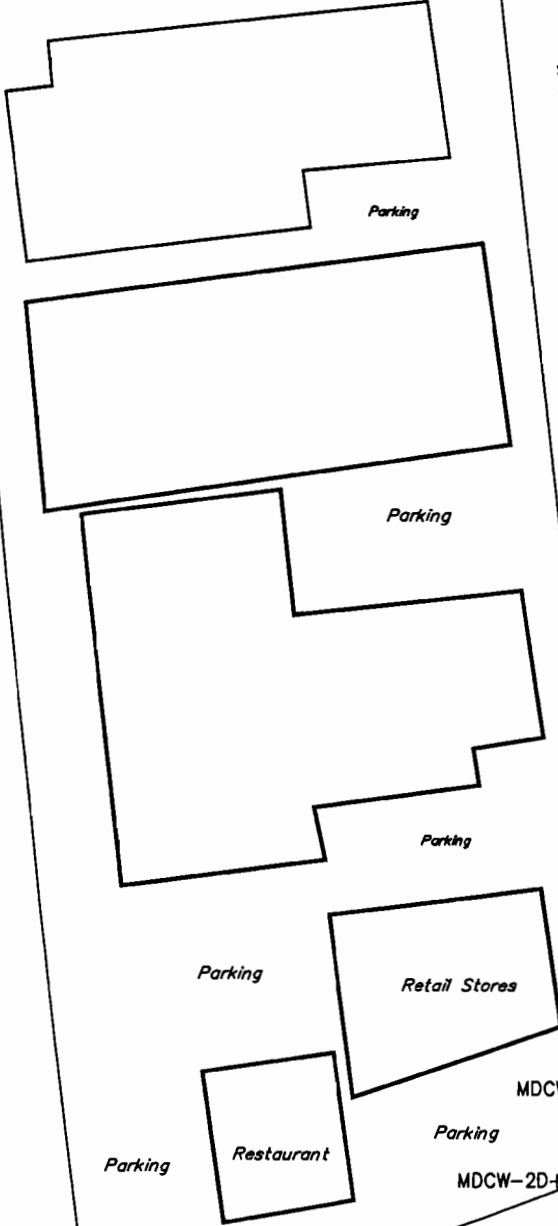


ADMW11

PROPERTY BOUNDARY

NEW YORK AVENUE

BROOKLYN AVENUE



NC-11

MDCW-2S

MDCW-2D

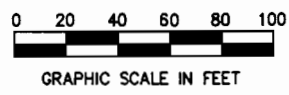
MDCW-3S

ROAD

OLD

COUNTRY

Curb



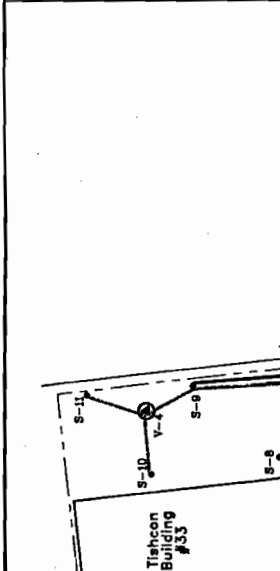
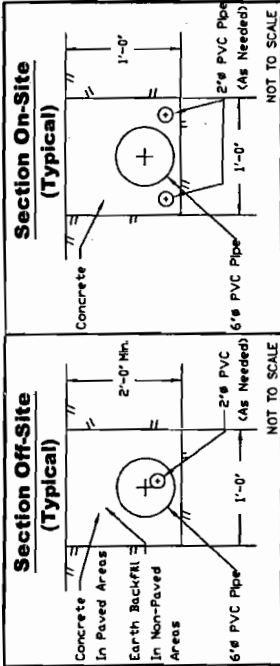
LEGEND

- ⊕ 2-INCH DIAMETER MULTI-DEPTH WELL CLUSTER
- ⊗ EXISTING NCDH/USGS MONITORING WELL
- ⊕ WATER TABLE MONITORING WELL

CA RICH CONSULTANTS, INC.

Certified Ground-Water and Environmental Specialists
17 Dupont Street, Plainview, New York 11803

TITLE: EXISTING GROUNDWATER MONITORING WELL LOCATIONS		DATE: 10/29/04
FIGURE: 1		SCALE: AS SHOWN
DRAWING NO.: 1154-1A	30-36 NEW YORK AVENUE 31-33 BROOKLYN AVENUE WESTBURY, NEW YORK	DRAWN BY: S.T.M. APPR. BY: E.A.W.



ZONE #	AIR SPARGE POINTS	COLOR LINE	TUBING COLOR
1a	S1	---	RED
1b	S2	---	RED WITH GREEN TAPE
1c	S3	---	RED WITH ORANGE TAPE
2a	S6 & S7	---	YELLOW
2b	S10 & S11	---	GREEN
3a	S8 & S9	---	BLACK
3b	S5 & S4	---	BLUE
OS1	OFSP-1	---	BLACK WITH ORANGE TAPE
OS2	OFSP-2	---	BLACK WITH GREEN TAPE
OS3	OFSP-3	---	BLACK WITH BLUE TAPE
OS4	OFSP-4	---	BLACK WITH RED TAPE

CA RICH CONSULTANTS, INC.
 Certified Groundwater and Environmental Specialists
 17 Dupont Street, Plainview, New York 11803

Stephen J. Osmundsen, P.E.
 Consulting Engineer
 513 Centre Island Road, Oyster Bay, New York 11771

TITLE: Air Sparge Point and SVE Well Layout
 DATE: 11/2/04
 SCALE: 1" = 60'
 DRAWN BY: S.T.M.
 CHECKED BY: S.U.O./E.A.W.

LEGEND

- ⊙ SOIL VAPOR EXTRACTION WELL (SVE)
- ⊙ DEEP SPARGE POINT
- ⊙ SHALLOW SPARGE POINT
- ⊙ COMBINATION DEEP SPARGE POINT and SVE WELL
- ⊙ UTILITY PULL BOX

0 20 40 60 80 100
 GRAPHIC SCALE IN FEET

