Department of Environmental Conservation

Division of Environmental Remediation

Record of Decision

O.P. Held Inc., Site
City of Utica, Oneida County
Site Number 6-33-034

November 2000

New York State Department of Environmental Conservation
GEORGE E. PATAKI, *Governor* JOHN P. CAHILL, *Commissioner*

DECLARATION STATEMENT - RECORD OF DECISION

O.P. Held Inc. Inactive Hazardous Waste Site
City of Utica, Oneida County, New York
Site No. 6-33-034

Statement of Purpose and Basis

The Record of Decision (ROD) presents the selected remedy for the O.P. Held Inc., a class 2 inactive hazardous waste disposal site which was chosen in accordance with the New York State Environmental Conservation Law. The remedial program selected is not inconsistent with the National Oil and Hazardous Substances Pollution Contingency Plan of March 8, 1990 (40CFR300).

This decision is based on the Administrative Record of the New York State Department of Environmental Conservation (NYSDEC) for the O.P. Held Inc., inactive hazardous waste site and upon public input to the Proposed Remedial Action Plan (PRAP) presented by the NYSDEC. A listing of the documents included as a part of the Administrative Record is included in Appendix A of the ROD.

Assessment of the Site

Actual or threatened release of hazardous waste constituents from this site have been addressed by implementing the interim remedial measure identified in this ROD, therefore the site no longer represents a current or potential significant threat to public health and the environment.

Description of Selected Remedy

Based on the successful implementation of the Interim Remedial Measure (IRM), the Department has selected to delist the site from the Inactive Hazardous Waste Site Registry.

New York State Department of Health Acceptance

The New York State Department of Health concurs with the delisting of the site.

Declaration

The selected remedy is protective of human health and the environment and complies with State and Federal requirements that are legally applicable or relevant and appropriate.

12/18/2010
Date

Michael J. O'Toole, Jr., Director
Division of Environmental Remediation

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RECORD OF DECISION

O.P. Held Inc. Site
City of Utica, Oneida County
Site No. 6-33-034
November 2000

SECTION 1: SUMMARY OF THE RECORD OF DECISION

The New York State Department of Environmental Conservation (NYSDEC) in consultation with the New York State Department of Health has selected this remedy for the O.P. Held Inc. class 2, inactive hazardous waste disposal site. As more fully described in Sections 3 and 4 of this document, illegal dumping and historic spillage resulted in the disposal of a number of hazardous wastes, including heavy metals, petroleum and solvents, at the site. These disposal activities resulted in the following significant threats to the public health and/or the environment:

- a significant threat to human health associated with the contact with contaminated soils and hazardous waste left on site;
- a significant environmental threat associated with the impacts of contaminants to groundwater and soil.

During the course of the investigation certain actions, known as Interim Remedial Measures (IRMs), were identified in response to the identified threats. An IRM is conducted at the site when a source of contamination or exposure pathway can be effectively addressed before the completion of the RI/FS. The IRMs undertaken at the site included:

- the removal of 885 tons of petroleum and metal contaminated soils;
- the removal of three (3) underground storage tanks and associated piping;
- the removal of 7,235 gallons of petroleum contaminated liquids; and
- performance of verification sampling to confirm that all cleanup goals were achieved.

Based on the success of the above IRM, the site no longer poses a threat to human health or the environment, and therefore the No Further Action was selected as the remedy for this site. In addition, the Department will also delist the site from the New York State Registry of Inactive Hazardous Waste Disposal Sites.

SECTION 2.0: LOCATION AND DESCRIPTION

The O.P. Held site was the location of a screw manufacturing facility located on Rutgers Street in the City of Utica, Oneida County. The site consists of a triangularly shaped lot, which slopes gently to the southwest and is approximately one acre in size. The main manufacturing facility building was situated in the center of the site, but has since been demolished by the City. The main building was approximately 8000 square feet in size and housed the manufacturing area, storage area, staff lounge and packaging room. An office trailer once stood to the east of the manufacturing building but was also removed by the City of Utica in 1997. Rutgers Street and an abandoned rail line are located to the south, a fruit market and automobile repair shop are located to the north on Lansing Street, a small engine repair shop was located to the west and residential homes are found throughout the surrounding area.

3.0 SITE HISTORY

3.1: Operational/Disposal History

O.P. Held, Inc. operated a screw manufacturing facility in the City of Utica for many years. The start of the operation is unknown, however, the history of complaints and problems is well documented from about 1986. From 1986 to 1989 the facility operated while under scrutiny from the City of Utica, residential neighbors, the Bank of Utica and the NYSDEC. During this time, complaints from the community were voiced concerning the facility's waste handling, disposal practices and the overall site condition. By 1989, the company had declared bankruptcy and had abandoned the facility leaving a large quantity of waste. On February 17, 1989 the site was referred to the Department by the City of Utica and an emergency removal action was initiated by the Division of Hazardous Waste Remediation.

3.2: Remedial History

On March 2, 1989 an inspection of the facility was conducted and numerous drums and a container of waste oil and unknown materials were found abandoned in and out side of the main manufacturing facility. Numerous drums had been tipped over and their contents had spilled at the rear of the facility in the southwest corner of the site. From March 20, 1989 to June 5, 1989 an Emergency Removal Action (ERA) was performed to remove the majority of the abandoned waste which included:

1. 150 drums containing waste oil, solvents and debris;
2. 4,200 gallons of lead contaminated waste oil and a tank rinse water;
3. one - 4000 gallon underground storage tank;
4. 83.6 tons of lead contaminated soils associated with the leaking underground storage tank;
5. two-55 gallon drums of lead contaminated sludges from floor drains inside the main manufacturing building;
6. one - 5 gallon pail of PCB contaminated oil; and
7. 300 gallons of oil contaminated wash-water from drum cleaning activities.

At the conclusion of the ERA, a small area located to the south of the main manufacturing facility was fenced off due to the presence of visibly contaminated soils. The soils contained elevated levels of metals, oil and grease. The building was boarded up until such time that additional investigations could be conducted to determine the extent of residual contamination.

In 1997 the City of Utica demolished the on site buildings including the fence which had secured the contaminated area. This was part of a City wide effort to remove abandoned and unsafe structures.

SECTION 4: SITE CONTAMINATION

4.1: Summary of Site Investigations

The purpose of the IIWA was to define the nature and extent of any residual contamination remaining on site after the completion of the initial ERA.

The IIWA was performed in September of 1998 by Malcolm Pirnie, Inc. in cooperation with Department personnel. A report entitled Subsurface Site Characterization (SSC) was prepared describing the field activities and the findings of the IIWA in detail.

The IIWA included the following activities:

- collection of nineteen (19) surficial soil samples to evaluate shallow residual contamination;
- installation of ten (10) soil borings for chemical analysis of soils;
- excavation of four (4) test pits to evaluate site conditions, the potential for sources of contamination, and to look for the presence of underground storage tanks; and
- installation of shallow well points to evaluate impacts to the shallow groundwater.

To determine which media (soil, groundwater, etc.) contain contamination at levels of concern, the IIWA analytical data were compared to environmental Standards, Criteria and Guidance (SCGs). Groundwater and drinking water SCGs identified for the O.P. Held site were based on NYSDEC Ambient Water Quality Standards and Guidance Values and Part V of NYS Sanitary Code. NYSDEC TAGM 4046 soil cleanup guidelines for protection of groundwater, background conditions, and risk-based remediation criteria were used as SCGs for soil. Petroleum -Contaminated Soil Guidance Policy STARS Memo #1 was used to evaluate the requirements for proper closure of the underground storage tanks.

Based on the IIWA results, in comparison to the SCGs and potential public health and environmental exposure routes, certain areas and media at the site required remediation. These are summarized below. More complete information can be found in the Subsurface Site Characterization Report.

4.1.1 Site Geology & Hydrogeology:

The site lies approximately one mile south of the Mohawk River at an elevation of 500 feet above Mean Sea Level, within the Mohawk River drainage basin. The site slopes gently to the south towards Rutgers Street. A drainage swale is on the southern side of the property and during seasonal periods water has accumulated at the property's edge.

Site soils were comprised of fill material which was encountered up to a depth of 6 feet below grade. These soils were found to contain silty sand with gravel intermixed with silty clay and gravel. Beneath this fill layer, a dense unconsolidated glacial till composed of dark gray clay and silt with medium sub-rounded gravel was encountered. Because of its very low permeability, the glacial till acts as a barrier to the downward migration of groundwater and/or contamination.

The installation of monitoring wells in the till layer was determined to be inappropriate due to the low permeability of the dense native clay and silt underlying the fill material. No measurable amount of water or contamination was found in the till. Shallow well points were installed to a depth of approximately 2 to 3 feet below grade to collect groundwater samples at the site. This perched water table is seasonal in nature and does not represent a true groundwater table.

4.1.2 Nature of Contamination:

As described in the SSC Report, many soil and groundwater samples were collected to characterize the nature and extent of contamination.

The main category of contaminants which exceed their SCGs are semivolatile organics (SVOCs) and metals. The contamination is attributed to the use of cutting oils and the metal waste derived from the cutting operations. Subsequent spillage and poor handling of the waste caused releases to the environment which have been found around the site. In addition to the chemical composition of the soil and groundwater, one underground storage tank was found to be present at the site.

4.1.3 Extent of Contamination

The following are the media which were investigated and a summary of the findings of the investigation.

Soil

Soils at Test Pit 2 exhibited total xylene at 88 ppm. Soils at Test Pit 4 exhibited magnesium at 8430 ppm and Nickel at 36.8 ppm.

Surficial soils found at the site exceed SCGs for benzo(a)anthracene, chrysene, benzo(b)fluoranthene, benzo(k)fluoranthene, benzo(a)pyrene, indeno(1,2,3-cd) pyrene, cadmium, chromium, lead, magnesium, mercury, nickel and selenium. A complete listing of site contamination found during the IIWA is presented in Table 1-1. Most site contamination has been found in the upper two feet of soil and is believed to be related to the wastes that were abandoned and subsequently spilled. These soils are located at the southwestern end of the site, near the rear entrance to the old manufacturing building.

Sediment

Sediments from a small drainage swale found on the southern end of the site, which runs parallel to Rutgers Street, were sampled and found to contain low levels of benzo(a)anthracene, chrysene, benzo(a)pyrene, chromium, copper, magnesium, mercury, nickel, and zinc. This contamination is most likely associated with contamination found in the surficial soils at the southwestern end of the site. These contaminated surficial soils have been transported to the drainage swale by surface water run off during storm events or during winter snow melt.

During most of the year, this drainage swale is dry. Contamination found in the sediment is presented in Table 1-1.

Waste

During the IIWA, one underground storage tank was found. The contents were analyzed and were found to be kerosene. Kerosene was most likely used as a cutting oil during the screw machining operation. The kerosene has characteristics of an ignitable waste, D001. The tank was estimated to be 1000 gallons in size; however, the integrity of the tank was not known at the time of the IIWA.

Ground Water

Well points were installed which allowed for sampling and identification that the shallow groundwater was contaminated with predominantly metals which include barium, beryllium, cadmium, chromium, cobalt, copper, iron, lead, magnesium, and manganese. Levels of toluene, benzo(a)anthracene, chrysene, benzo (a)pyrene, and phenol were found at low concentrations. The perched water table was located predominately in the upper two feet of the fill soils above the till. No measurable amount of groundwater or contamination was found below the till unit.

Surface Water

No surface water is found on site except for periodic accumulations created during snow melt or rain fall events.

Air

Air sampling conducted during the soil investigation did not identify any air borne contaminants. The contamination found on site not does not volatilize easily and therefore, does not cause air quality standards contraventions.

4.2 Interim Remedial Measures (IRM):

As a result of the IIWA investigation an IRM was implemented in April and May of 2000. The IRM was developed to address all known hazardous waste contamination at the site which included the underground storage tank containing D001 (Ignitable) waste and contaminated soils containing heavy metals which remained after the ERA was completed. During the course of the IRM, two additional underground storage tanks were identified. These tanks were cleaned and removed along with associated contaminated soils and piping.

The following materials were removed as part of the IRM:

1. 885 tons of petroleum and metal contaminated soils;

2. Three (3) underground petroleum storage tanks; and

3. 7,235 gallons of petroleum contaminated liquids.

During the course of the IRM, verification samples from the excavation areas were taken to determine compliance with SCGs. Soil cleanup goals were achieved for all areas of concern pursuant to the NYS DEC's Technical and Administrative Guidance Memorandum (TAGM) 4046. The site was restored to existing grade level after the waste was excavated.

4.3 Summary of Human Exposure Pathways:

An exposure pathway is how an individual may come into contact with a contaminant. The five elements of an exposure pathway are: 1) the source of contamination; 2) the environmental media and transport mechanisms; 3) the point of exposure; 4) the route of exposure; and 5) the receptor population. These elements of an exposure pathway may be based on past, present, or future events.

Human exposure pathways which may have existed in the past have been eliminated by the removal of hazardous wastes during the Interim Remedial measures conducted at the site.

4.4: Summary of Environmental Exposure Pathways:

This section summarizes the types of environmental exposures which may be presented by the site. All hazardous waste above TAGM 4046 soil cleanup goals have been removed from the site. Soil cleanup goals have been achieved for all specific compounds and for all unspecified semi-volatile organic compounds on an individual or on a totals basis, therefore no environmental risk exists.

SECTION 5: ENFORCEMENT STATUS

Potentially Responsible Parties (PRPs) are those who may be legally liable for contamination at the site. This may include past and present owners and operators, waste generators and haulers.

At this time the City of Utica is the property owner. The O.P. Held Corporation was the owner and operator at the time when the waste was generated and released, however the company went bankrupt in 1989. No consent orders or agreements have been negotiated at this time.

SECTION 6: SUMMARY OF SELECTED ACTION

Based on the results of the investigations and the IRMs that have been performed at the site, the NYSDEC has selected the No Further Action as the final remedial action for this site. During the investigation all waste and contaminated soil was identified and found to be isolated to the site. During the IRM all waste and contaminated media above SCG's were removed from the site and groundwater has not been impacted.

The Department will delist the site from the New York State Registry of Inactive Hazardous Waste Disposal Sites. The site will be available for redevelopment in accordance with the City of Utica requirements.

SECTION 7: HIGHLIGHTS OF COMMUNITY PARTICIPATION

As part of the remedial investigation process, a number of Citizen Participation activities were undertaken in an effort to inform and educate the public about conditions at the site and the potential remedial alternatives. The following public participation activities were conducted for the site:

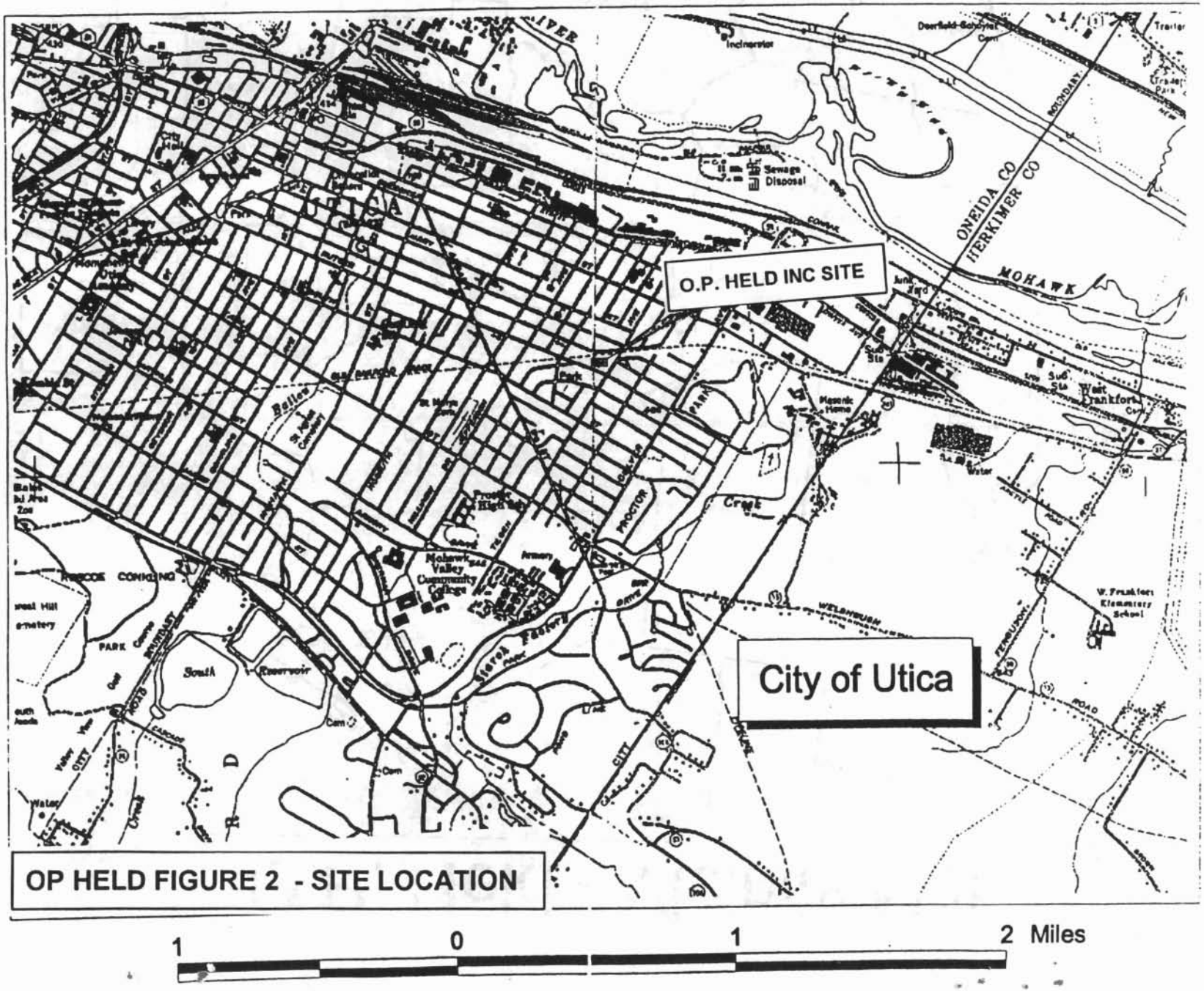
- A repository for documents pertaining to the site was established.
- A site mailing list was established which included nearby property owners, local political officials, local media and other interested parties.
- A public availability session was conducted and notices were mailed to all interested parties, inviting them to visit the Department representatives and talk about the PRAP.

No comments were received during the public comment period, either written or verbal, which would effect the selected remedy.

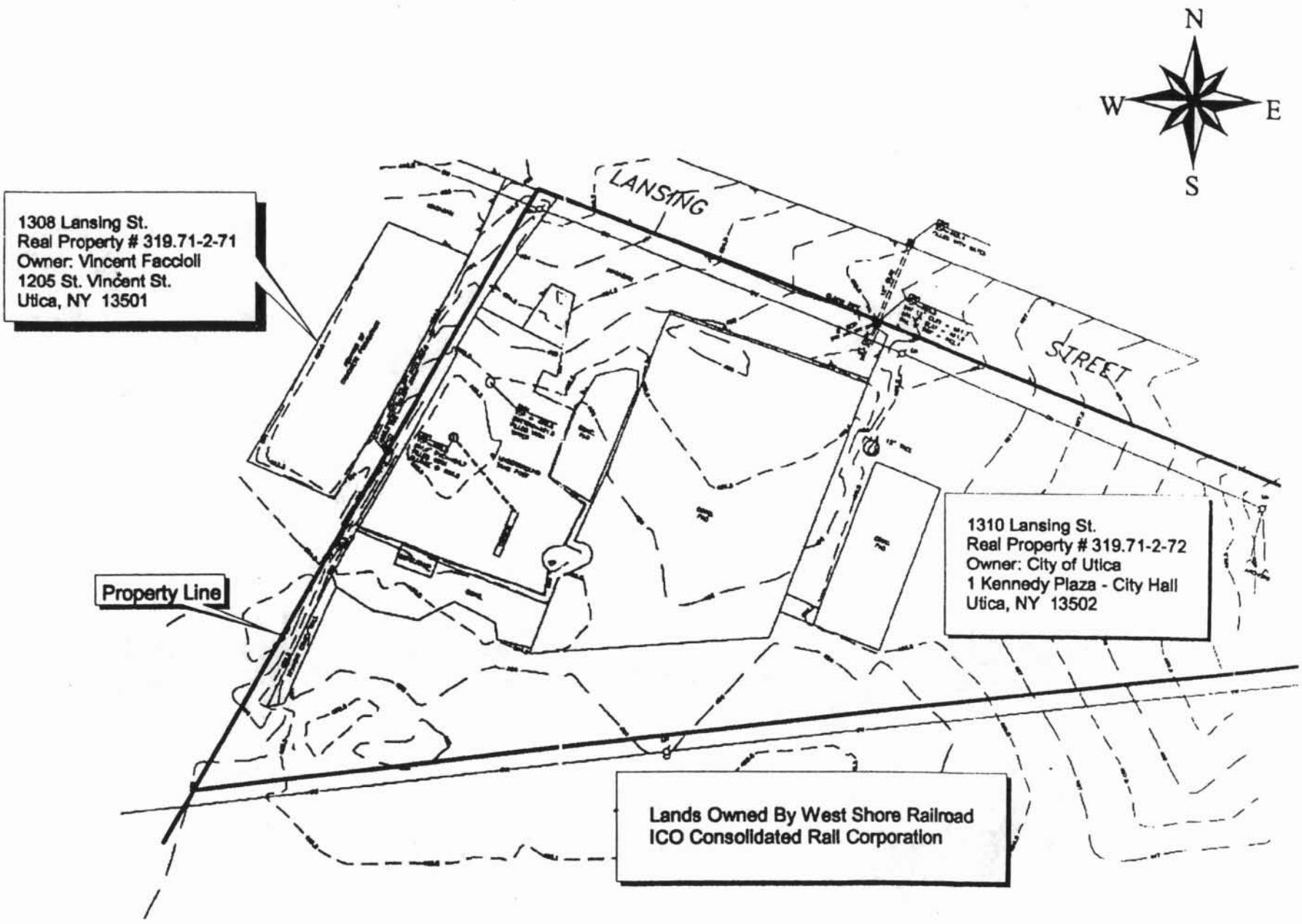
O.P. Held - Vicinity Map

OP HELD FIGURE 1 - VICINITY MAP

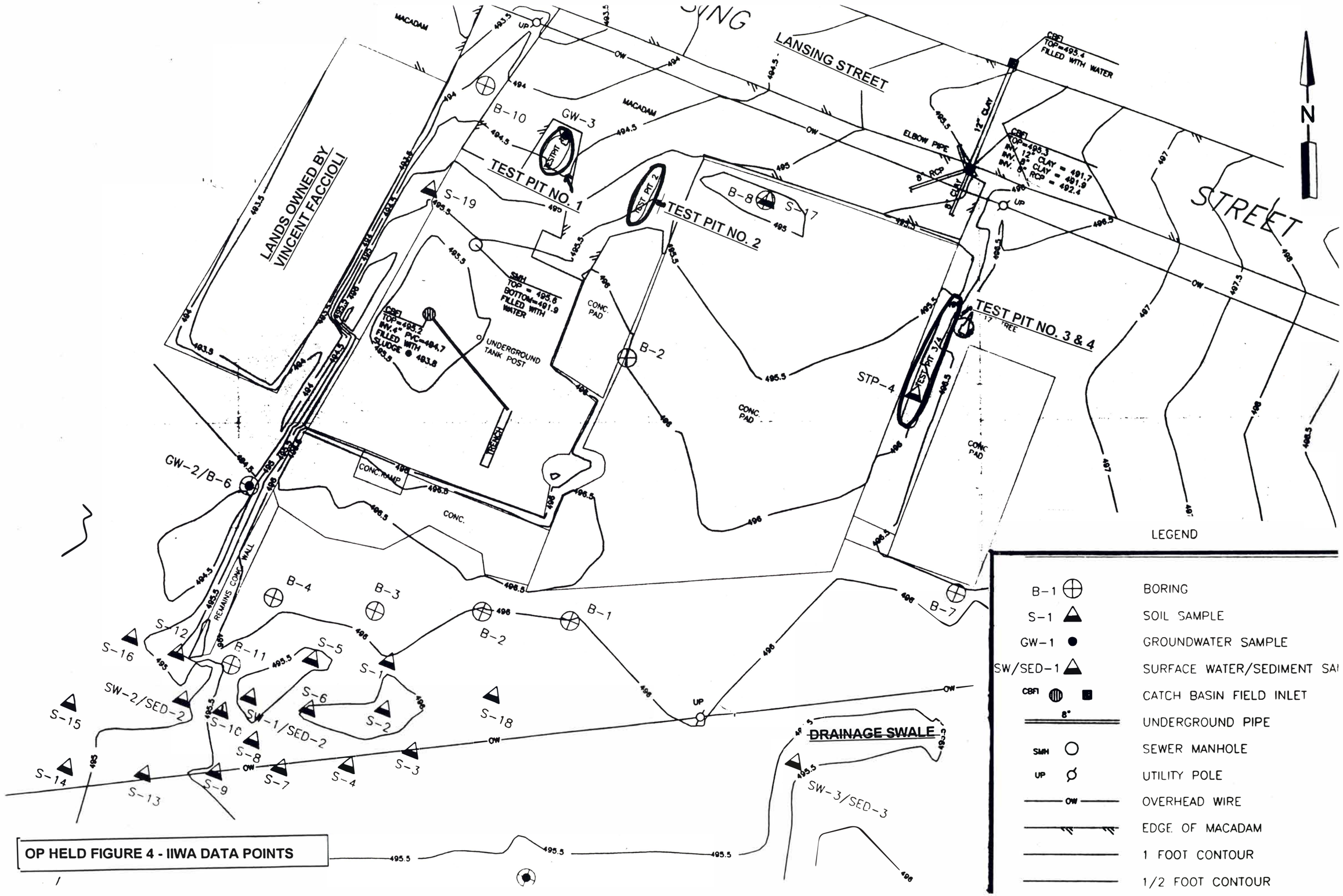
O.P Held - Site Location Map



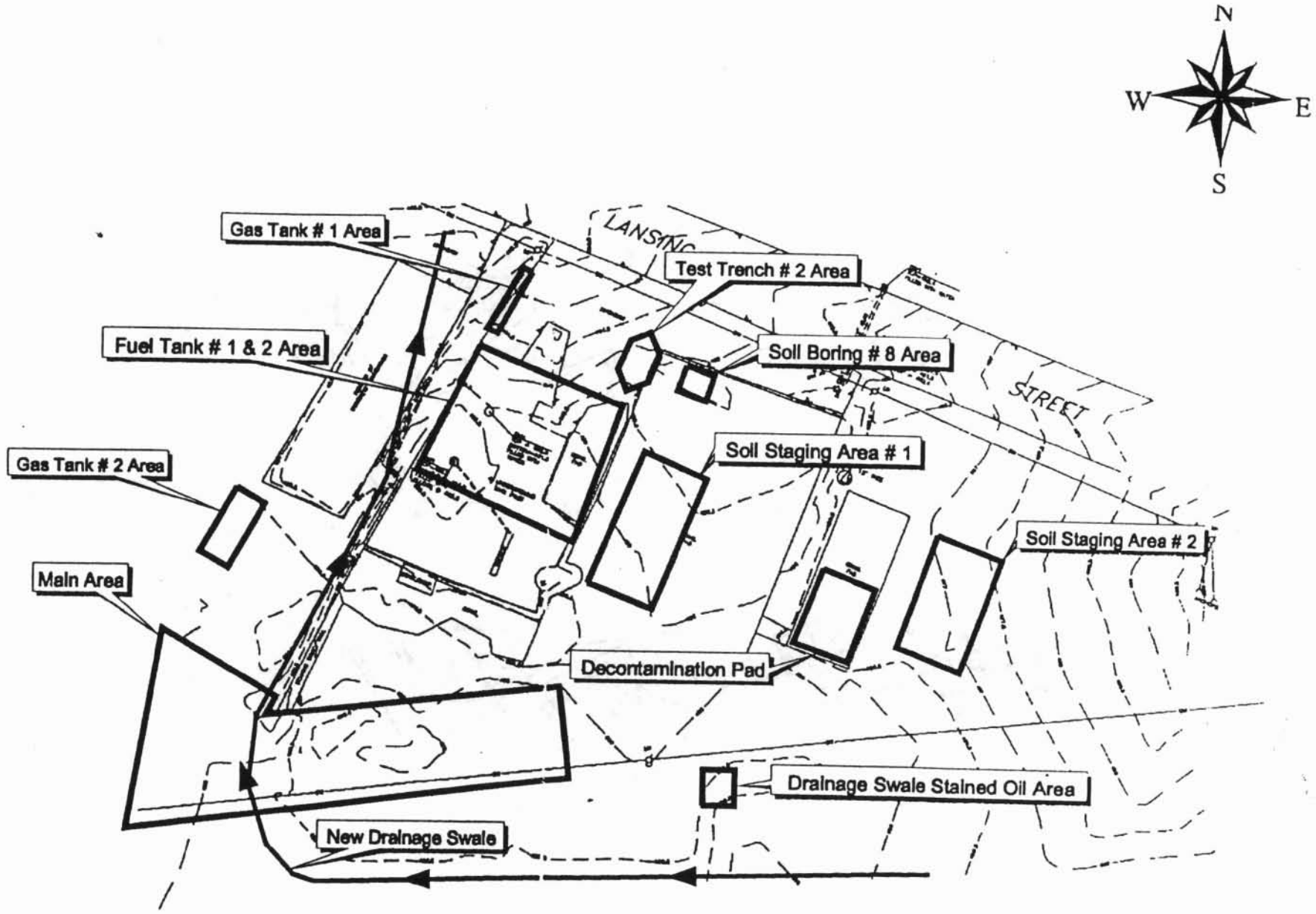
OP HELD FIGURE 2 - SITE LOCATION



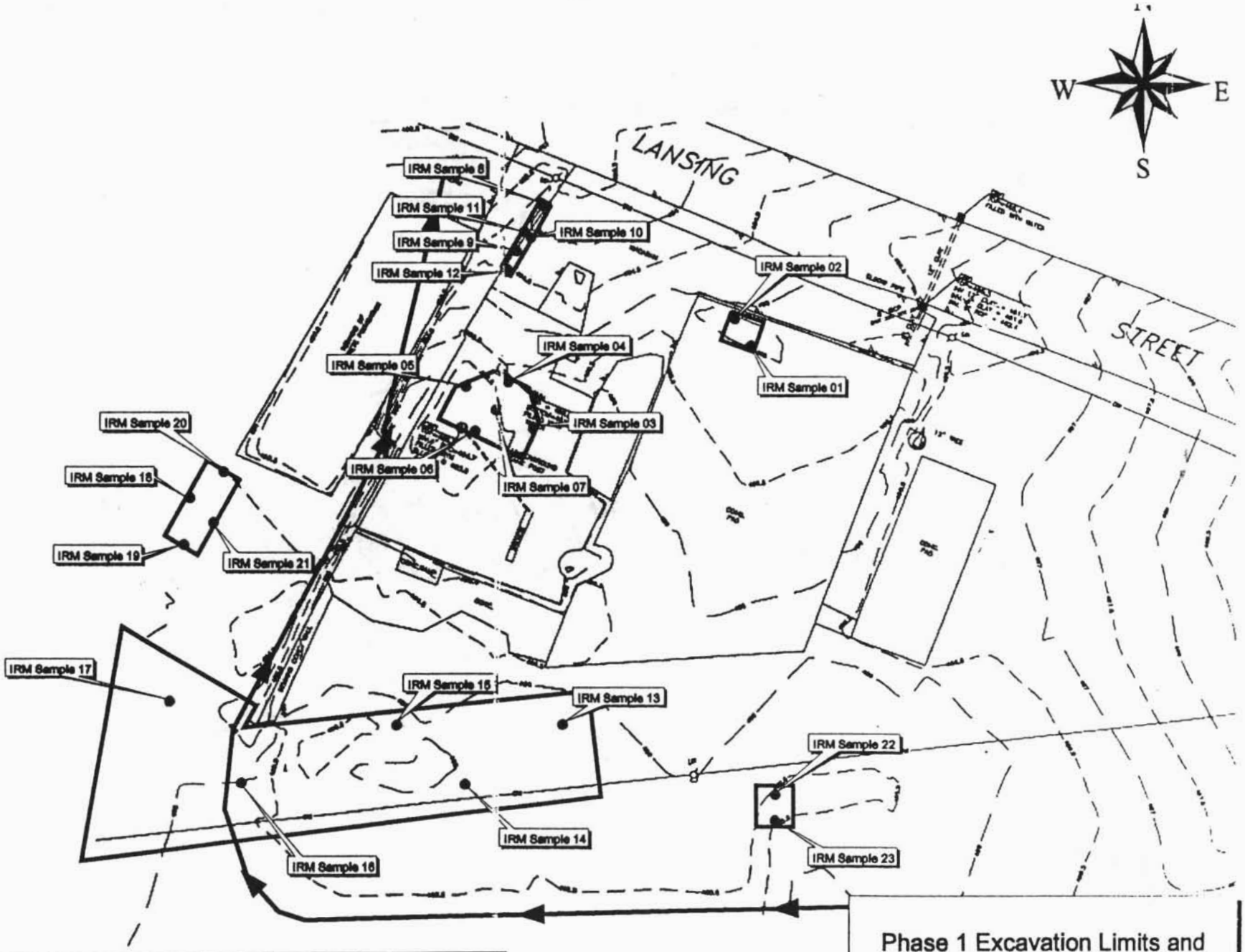
OP HELD FIGURE 3 - SITE OWNERS



OP HELD FIGURE 4 - IIWA DATA POINTS

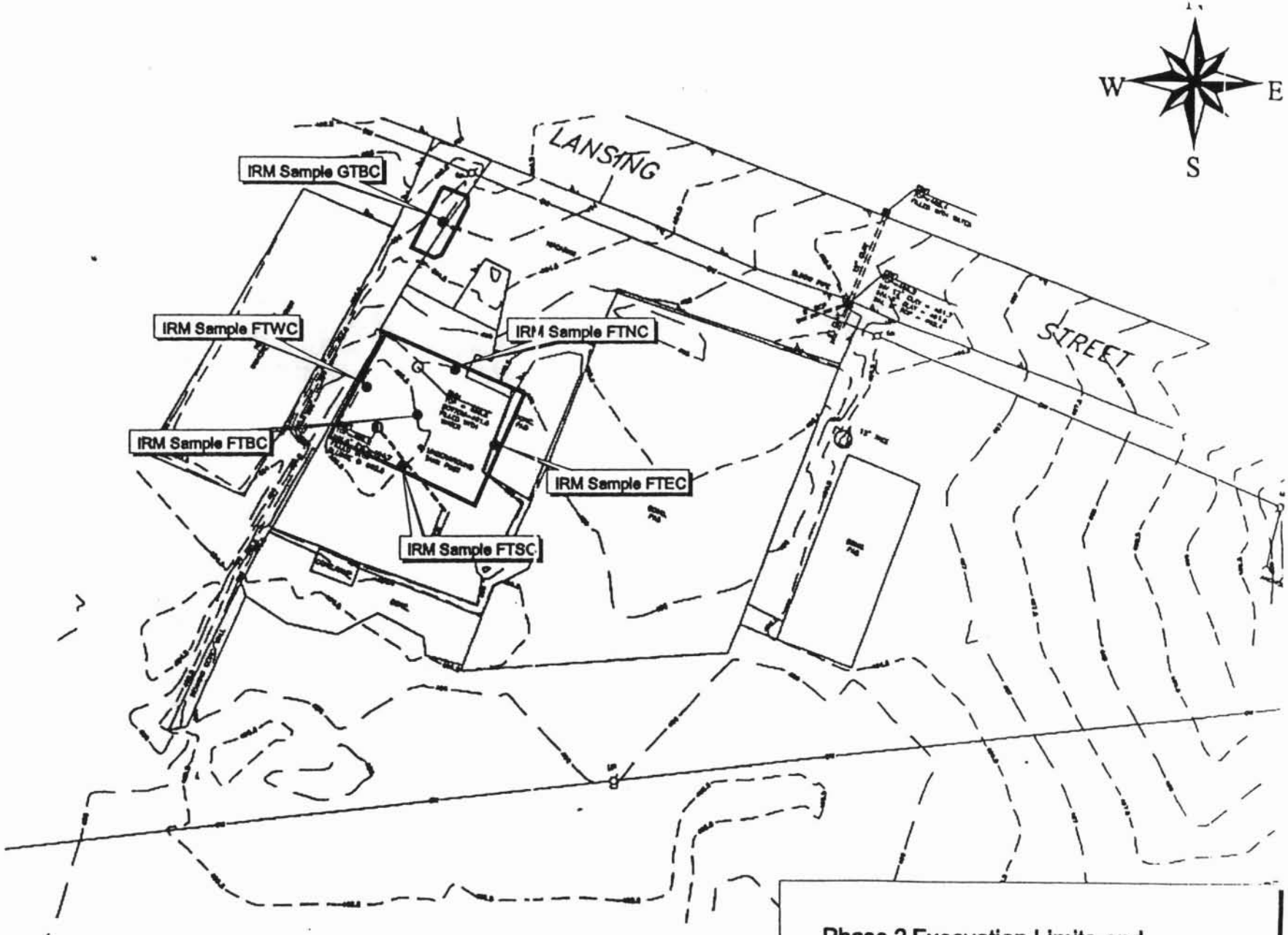


OP HELD FIGURE 5 - SITE FEATURES



OP HELD FIGURE 6 - PHASE 1 - IRM

Phase 1 Excavation Limits and Verification Soil Sampling Map
April 2000



OP HELD FIGURE 7 - PHASE 2 - IRM

Phase 2 Excavation Limits and
Verification Soil Sampling Location Map
May 2000

Table 1-1
Immediate Investigative Work Assignment Results
Representative Site Contamination

Medium	Class	Contaminant	Concentration Range	Frequency of Exceedances	SCG's*
Soil	Volatile Organic Compounds	Acetone	Non Detect - 200 ppb	1 out of 22	200 ppb
		(m+p) Xylene	Non Detect - 52,000 ppb	1 out of 22	1,200 ppb
		o-xylene	Non Detect - 36,000 ppb	1 out of 22	1,200 ppb
	Semi Volatile Organic Compounds	Benzo (a) anthracene	Non Detect - 1,600 J ppb	5 out of 22	224 ppb
		Chrysene	Non Detect - 3,400 J D ppb	5 out of 22	400 ppb
		Benzo (b) Fluoranthene	Non Detect - 3900 D ppb	3 out of 22	1,100 ppb
		Benzo (k) Fluroanthene	Non Detect - 3,400 J D ppb	3 out of 22	1,100 ppb
		Benzo (a) Pyrene	Non Detect - 3,400 D ppb	7 out of 22	61 ppb
		Indeno (1,2,3-cd) Pyrene	Non Detect - 3,700 J D ppb	1 out of 22	3,200 ppb
		DiBenz (a,h) anthracene	Non Detect - 1,200 J ppb	4 out of 22	14 ppb
		Phenol	Non Detect - 5,400 J ppb	3 out of 22	30 ppb
		4-Chloro-3 Methyl Phenol	Non Detect - 7,000 J ppb	1 out of 22	240 ppb
	Metals	Chromium	Non Detect - 138 ppm	3 out of 22	50 ppm or SB
		Lead	Non Detect - 5,340 ppm	5 out of 22	200-500 ppm
		Magnesium	Non Detect - 8,430 ppm	1 out of 22	SB
		Mercury	Non Detect - 1.1 ppm	4 out of 22	0.1 ppm
		Nickel	Non Detect - 128 ppm	8 out of 22	13 ppm or SB
		Selenium	Non Detect - 29.6 ppm	2 out of 22	2 ppm or SB
		Zinc	Non Detect - 544 ppm	1 out of 22	20 ppm or SB

Medium	Class	Contaminant	Concentration Range	Frequency of Exceedances	SCG's*
Groundwater	Volatile Organic Compounds	Toluene	Non Detect - 5 J ppb	1 out 10	5 ppb
	Semi Volatile Organic Compounds	Benzo (a) Anthracene	Non Detect - 2 J ppb	1 out 10	.002 ppb
		Chrysene	Non Detect - 2 J ppb	1 out of 10	.002 ppb
		Benzo (a) Pyrene	Non Detect - 2 J ppb	1 out of 10	.002 ppb
		Phenol	Non Detect - 6 J ppb	1 out of 10	.002 ppb
	Metals	Barium	Non Detect - 8750 ppb	2 out of 10	1 ppb
		Beryllium	Non Detect - 37 ppb	3 out of 10	1000 ppb
		Cadmium	Non Detect - 63.4 ppb	3 out of 10	3 ppb
		Chromium	Non Detect - 908 ppb	3 out of 10	5 ppb
		Cobalt	Non Detect - 761 ppb	3 out of 10	50 ppb
		Copper	Non Detect - 252 ppb	1 out of 10	200 ppb
		Iron	Non Detect - 1,700,000 ppb	8 out of 10	300 ppb
		Lead	Non Detect - 11,300 ppb	4 out of 10	25 ppb
		Magnesium	Non Detect - 405,000 ppb	4 out of 10	35,000 ppb
		Manganese	Non Detect - 198,000 ppb	6 out of 10	300 ppb
		Nickel	Non Detect - 1,620 ppb	3 out of 10	100 ppb
		Selenium	Non Detect - 368 ppb	2 out of 10	10 ppb
		Silver	Non Detect - 70.9 ppb	1 out of 10	50 ppb
		Sodium	Non Detect - 99,100 ppb	7 out of 10	20,000 ppb
		Thallium	Non Detect - 52.8 ppb	4 out of 10	0.5 ppb
		Vanadium	Non Detect - 1,040 ppb	3 out of 10	14 ppb
		Zinc	Non Detect - 32,400 ppb	3 out of 10	2000 ppb

Medium	Class	Contaminant	Concentration Range	Frequency of Exceedances	SCG's*
Sediment	Semi Volatile Organic Compounds	Benzo (a) Anthracene	Non Detect - 500 ppb	1 out of 3	224 ppb
		Chrysene	Non Detect - 520 ppb	1 out of 3	400 ppb
		Benzo (a) Pyrene	130 J - 480 ppb	3 out of 3	61 ppb
	Metals	Copper	250 - 521 ppm	3 out of 3	1 - 50 ppm
		Magnesium	3,770 - 5,040 ppm	1 out of 3	SB
		Mercury	0.08 - 0.33 ppm	2 out of 3	0.1 ppm
		Nickel	Non Detect - 33.6 ppm	2 out of 3	13 or SB
		Zinc	Non Detect - 546 ppm	2 out of 3	20 or SB

Notes:

- SCG's for groundwater are based on standards found in 6NYCRR Part 703
- SCG's for soils are based on the NYSDEC's TAGM 4046
- SCG's for metals are based on the NYSDEC's TAGM 4046 or site background (SB)

Acronyms:

- ppb - parts per billion
- ppm - parts per million
- J - Indicates estimated value
- D - Spike diluted out

Table 1-2
O.P. HELD Site No. 6-33-034
Phase I Verification Sampling Results
April 26, 2000

Sample	Location	Contaminant	Level	TAGM 4046	STARS
03	Fuel Tank # 1	n-propylbenzene	1,600 ppb		100 ppb
		1,2,4-Trimethylbenzene	780 ppb		100 ppb
		Sec-Butylbenzene	3, 400ppb		100 ppb
		Isopropyl toluene	1,400 ppb		100 ppb
		n-Butylbenzene	9,300 ppb		100 ppb
04	Fuel Tank # 1	n-propylbenzene	110 ppb		100 ppb
		n-Butylbenzene	740 ppb		100 ppb
05	Fuel Tank # 1	n-propylbenzene	2,600 ppb		100 ppb
		1,2,4-Trimethylbenzene	11,000 ppb		100 ppb
		Sec-Butylbenzene	1,800 ppb		100ppb
		Isopropyl toluene	790 ppb		100 ppb
06	Fuel Tank # 1	n-propylbenzene	190 ppb		100 ppb
		Sec-Butylbenzene	310 ppb		100 ppb
07	Fuel Tank # 1	1,2,4 - Trimethylbenzene	190 ppb		100 ppb
		Sec-Butylbenzene	120 ppb		100ppb
		n-Butylbenzene	790 ppb		100 ppb
09	Gas Tank # 1	Benzene	800 ppb	60 ppb	14 ppb
		1,2,4-Trimethylbenzene	160 ppb		100 ppb
12	Gas Tank # 1	Benzo(a)pyrene	110 J ppb	61 ppb	40 ppb
13	Main Area	Benzo(a)pyrene	200 J ppb	61 ppb	40 ppb
15	Main Area	Benzo(a)anthracene	340 J ppb	224 ppb	40 ppb
		Benzo(a)pyrene	390 J ppb	61 ppb	40 ppb
17	Main Area	Benzo(a)anthracene	350 J ppb	224 ppb	40 ppb

Sample	Location	Contaminant	Level	TAGM 4046	STARS
20	Gas Tank # 2	Benzo(a)anthracene	420 J ppb	224 ppb	40 ppb
		Benzo(b)fluroanthene	1,100 J ppb	1,100 ppb	40 ppb
		Benzo(a)pyrene	530 J ppb	61 ppb	40 ppb
21	Gas Tank # 2	Benzo(a)pyrene	150 J ppb	61 ppb	40 ppb
22	Oil Stained Area	Benzo(a)pyrene	210 J ppb	61 ppb	40 ppb

Notes:

- SCG's for soils are based on the NYSDEC's TAGM 4046

Acronyms:

- ppb - parts per billion
- ppm - parts per million
- J - Indicates estimated value
- D - Spike diluted out

Table 1-3
O.P. HELD Site No. 6-33-034
Phase II Verification Sampling Results
May 26, 2000

Sample	Location	Contaminant	Level	TAGM 4046
FTWC TOTAL	Fuel Tank # 1 & # 2	Sec-Butylbenzene	0.36 ppm	< 50 ppm
		n-Butylbenzene	0.536 ppm	< 50 ppm
		Tert-Butylbenzene	0.124 ppm	< 50 ppm
		Naphthalene	0.487 ppm	< 13 ppm
		N-Propylbenzene	0.319 ppm	< 50 ppm
		1,2,4-Trimethylbenzene	0.118 ppm	< 50 ppm
		1,3,5 - Trimethylbenzene	0.321 ppm	< 50 ppm
FTSC TOTAL	Fuel Tank # 1 & # 2	Sec-Butylbenzene	4.97 ppm	< 50 ppm
		n-Butylbenzene	0.536 ppm	< 50 ppm
		Tert-Butylbenzene	1.21 ppm	< 50 ppm
		Naphthalene	7.54 ppm	<13.0 ppm
		N-Propylbenzene	3.89 ppm	< 50 ppm
		1,2,4-Trimethylbenzene	2.24 ppm	< 50 ppm
		1,3,5 - Trimethylbenzene	2.58 ppm	< 50 ppm
FTBC TOTAL	Fuel Tank # 1 & # 2	Sec-Butylbenzene	5.47 ppm	< 50 ppm
		n-Butylbenzene	17.3 ppm	< 50 ppm
		Tert-Butylbenzene	2.06 ppm	< 50 ppm
		Naphthalene	6.21 ppm	< 13 ppm
		Cymene	4.36 ppm	< 50 ppm

Sample	Location	Contaminant	Level	TAGM 4046
FTBC TOTAL	Fuel Tank # 1 & # 2 Cont.	n-propylbenzene	3.81 ppm	< 50 ppm
		Sec-Butylbenzene	5.47 ppm	< 50 ppm
		1,2,4-Trimethylbenzene	13.0 ppm	< 50 ppm
		1,3,5 - Trimethylbenzene	5.79 ppm	< 50 ppm
		2-Methylnaphthalene	1.6 ppm	< 50 ppm
		Naphthalene	0.740 ppm	< 13 ppm

FTWC - Fuel Tank West Composite
FTSC - Fuel Tank South Composite
FTBC - Fuel Tank Bottom Composite
ppm - Parts per million
Total analysis utilizing USEPA Method 8021 or 8270 for Volatile and Semivolatile Organic Compounds
Pursuant to the NYSDEC's Technical and Administrative Guidance Memorandum the cleanup goal for unspecified semivolatile organics is 50 ppm for individual compounds and 500 ppm for total concentrations.

APPENDIX A

RESPONSIVENESS SUMMARY

O.P. Held Inc.
Proposed Remedial Action Plan
City of Utica, Oneida County, New York
Site No. 6-33-034

The Proposed Remedial Action Plan (PRAP) for the O.P. Held Site, was prepared by the New York State Department of Environmental Conservation (NYSDEC) and placed in the local document repository on September 29, 2000. This Plan outlined the preferred remedial measure proposed for the O.P. Held Site. The preferred remedy is to delist the site from the Inactive Hazardous Waste Site Registry due to the success cleanup of the site performed during the IRM.

The release of the PRAP was announced via a notice to the mailing list, informing the public of the PRAP's availability.

A public availability session was held on October 19, 2000 which included a presentation of the Immediate Investigative Work Assignment (IIWA) and the Interim Remedial Measure (IRM) as well as a discussion of the proposed remedy. The meeting provided an opportunity for citizens to discuss their concerns, ask questions and comment on the proposed remedy.

No comments, written or verbal, were received during the public comment period and/or availability session which would effect the Department's PRAP.

APPENDIX B

Administrative Record
O.P. Held Inc., Site No. 6-33-034

1. Proposed Remedial Action Plan, September 29, 2000, NYSDEC;

2. Interim Remedial Action Final Closure Report, July 21, 2000, NYSDEC;

3. Interim Remedial Action Summary Report, July 19, 2000, Environmental Products and Services, Liverpool, New York;

4. Interim Remedial Measure Work Plan, February 2000, NYSDEC

5. Immediate Investigative Work Assignment Report, August 1999, NYSDEC;

6. Soil Analysis Report, August 1989, Environmental Oil

7. Site Remediation Report, May 1989, Environmental Oil

8. Final Site Remediation Report (Emergency Removal), February 1989, Environmental Oil

9. Office Files and Correspondence 1986 - 2000, NYSDEC