

Endicott-Johnson, Inc
ENDICOTT, BROOME COUNTY, NEW YORK

Site Management Plan

NYSDEC Site Number: 704018

Prepared for:

Endicott-Johnson, Inc Site
City Tax Map Parcel 157.06-1.10
901 Franklin Street
Village of Endicott
Broome County, NY

Revisions to Final Approved Site Management Plan:

Revision #	Submitted Date	Summary of Revision	DEC Approval Date

March 2011

Executive Summary

The Endicott Johnson Corporation entered into an Order on Consent with the New York State Department of Environmental Conservation (NYSDEC or Department) to remediate contamination at their property on Franklin Street in Endicott, New York. After the remedial work, some residual contamination remained in the subsurface. To manage the remaining contamination and address the potential for future exposure to any residual contamination, Institutional Controls (ICs) in the form of a deed restriction have been placed on the property.

This Site Management Plan (SMP) was prepared to manage future activities at the Site, and specifies the methods to ensure compliance with all the ICs and Engineering Controls (ECs) that are or may be required by the deed restriction. This plan has been approved by the NYSDEC, in consultation with the New York State Department of Health (NYSDOH), and compliance with this plan by the property owner (as well as successors and assigns) is required per the aforementioned deed restriction. This SMP may only be revised with the approval of the NYSDEC.

Before any activities are undertaken at the property, all parties should be aware of the following restrictions:

- Any development or change of use of the property must be preceded by a “Change of Use” notification to the Department as required by regulation, currently found at 6NYCRR Part375-1.11(d). (Note that transfer of ownership of all or part of the property is considered a “change of use.”) Procedures for this notification can be found on the NYSDEC’s internet web page. The property may only be used for commercial or industrial purposes, currently defined in regulation at 6NYCRR Part375-1.8(g)(2), unless an express written waiver is obtained from the Department or Relevant Agency.
- Any person responsible for construction or excavation activities at the Site must follow the prior notification procedures detailed in Section 2.4 and Appendix C of this SMP. Any excavation work will be expected to adhere to the details found in the Excavation Work Plan, which is part of this SMP (Appendix C).
- Use of the groundwater underlying the Property is prohibited unless the user first obtains permission from the Department or Relevant Agency.
- Periodic certification to the Department will be required to certify that the controls put in place are unchanged from the previous certification, and that there is continued compliance with this SMP. Certification procedures are found in Section 5 of this SMP.

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SITE MANAGEMENT PLAN

1.0 Introduction and Description of Remedial Program

1.1 Introduction

This document is an element of the remedial program for the Endicott-Johnson site under the New York State Inactive Hazardous Waste Disposal Site Remedial Program, administered by New York State Department of Environmental Conservation (NYSDEC). The site was remediated in accordance with Order on Consent Index #T081286, which was executed on September 1, 1986, and is identified by NYSDEC Site No. 704018.

1.1.1 General

Endicott Johnson Corporation entered into an Order on Consent with the NYSDEC to remediate a property located in Endicott, New York. This Order on Consent required the Remedial Party to investigate and remediate contaminated media at the site. A figure showing the site location and boundaries of the 5.5-acre area subject to this plan is provided in Figure 1. The boundaries of the site are more fully described in the metes and bounds site description that is part of the Deed Restriction. (See Appendix A)

After completion of the remedial work, some residual contamination remained in the subsurface at this site. This Site Management Plan (SMP) was prepared to manage this remaining contamination. Specifically, this SMP details the means for implementing the Institutional Controls (ICs) and potential future Engineering Controls (ECs) applied to the site.

All reports associated with the site can be viewed by contacting the NYSDEC or its successor agency managing environmental issues in New York State.

1.1.2 Purpose

This SMP specifies the methods to ensure compliance with all ECs and ICs required by the Deed Restriction for contamination that remains at the site. This plan has

been approved by the NYSDEC, in consultation with the NYDDOH, and compliance with this plan by the property owner (as well as successors and assigns) is required by the aforementioned Deed Restriction. This SMP may only be revised with the approval of the NYSDEC.

This SMP includes three plans: (1) an Engineering and Institutional Control Plan for implementation and management of EC/ICs; (2) a Monitoring Plan for implementation of Site Monitoring; and (3) an Operation and Maintenance Plan.

This plan also includes a description of Periodic Review Reports for the periodic submittal of data, information, recommendations, and certifications to NYSDEC.

It is important to note that this SMP details the site-specific implementation procedures that are required by the Deed Restriction. Failure to properly implement the SMP is a violation of the restriction.

1.1.3 Revisions

Revisions to this plan must be proposed in writing to the NYSDEC's project manager. The NYSDEC will provide written notice of any approved changes to the SMP.

1.2 Site Background

A Consent Order (CO) was finalized in September of 1986. The CO required the responsible party to implement a Remedial Investigation/Feasibility Study (RI/FS) at the site. The results of the RI/FS confirmed the presence of contamination in both soil and groundwater. The RI/FS report was approved by the DEC on October 20, 1989. The Record of Decision was signed on November 1, 1990. The selected remedial measures included vacuum extraction of contaminated soil, and groundwater pumping and treating (air stripping). A CO for design and construction was signed on May 14, 1991.

Subsequent testing of the groundwater revealed that contamination by non-halogenated solvents had fallen below detection limits. Consequently, it was decided that groundwater pumping and treating would not be necessary or required. A soil vapor extraction system was installed in 1993, and operated from May 1993 until March 1997.

Confirmatory soil sampling in June 1997 revealed one “hot spot” of toluene contamination. The contaminated soil was excavated in October 2002, with 28 cubic yards (41 tons) of soil removed and properly disposed of at the Broome County Landfill.

In July 2005, a letter was sent by the NYSDEC to Endicott-Johnson which informed them of the site’s status as a “legacy vapor site,” and requested that they participate in an evaluation of the site’s potential for soil vapor contamination.

Groundwater and soil vapor samples were collected in September 2006 and October 2007 pursuant to a Department-approved work plan. The data from this sampling showed that some residual contamination remained on site in the groundwater and soil vapor. To address this residual contamination, institutional controls on the property were recommended.

1.2.1 Site Location and Description

The site is located at 901 Franklin Street in Endicott, New York, and is identified as Block 157.06-1 and Lot 10 on the Village of Endicott Tax Map. The site is an approximately 5.5-acre area bounded by Franklin St. and commercial/industrial properties to the south and east, and residential properties to the north and west. The boundaries of the site are more fully described in metes and bounds, included in Appendix A to this SMP. The site is currently a vacant lot.

1.2.2 Site History

The Endicott-Johnson property was the location of a small manufacturing plant for the Endicott-Johnson Shoe Manufacturing Company. There were two buildings on the property which were used for manufacturing shoe “cements” (cements are the glues used to hold shoes together). There were twelve underground tanks on the property that were used for storing solvents and raw materials used in making the shoe cements.

The manufacturing plant ceased operation in 1983. The underground tanks were excavated and the buildings were demolished. Analysis of soil and groundwater samples demonstrated contamination by several different constituents, with toluene being the primary contaminant of concern.

1.2.3 Geologic Conditions

The site is located in the Susquehanna and Chenango River Valley System, which is part of the Susquehanna River Basin. The surface of the site is relatively flat with the exception of the northern edge, which rises abruptly approximately 7 feet to the original elevation. The natural soils at the site consist of gravels, sands, silts, and clays of glacial and glacial-lacustrine origin. Due to the excavation of the former underground storage tanks and associated piping, up to 13.5 feet of fill exists at the site. The fill is composed of building debris (reinforced concrete and brick rubble), probably from the demolition of the two Endicott Johnson buildings (Demolished “A” Plant and Demolished “B” Plant), mixed with soils that were disturbed with the excavation of the buildings and tanks. The backfill soils are predominantly clay and silt, with occasional areas of sands and gravel.

The first continuous layer of natural soil encountered at the site was a gray silty glacial till occurring near the surface at the northern edge of the site and grading deeper to the south. A layer of glacial-lacustrine silt with occasional clay stringers and fine gravel up to 6.5 feet thick was encountered discontinuously throughout the southern portion of the site immediately above the till. This unit was probably excavated in the northern portion of the site, where the fill material overlies the till unit. Subsurface explorations did not extend to bedrock, so depth to bedrock on the site could not be accurately determined.

The regional groundwater system consists of an upper and lower aquifer separated by an impermeable layer of silt and clay. Outwash and kame sand and gravel form the most significant water bearing zones of the Endicott-Johnson City Area Aquifer. Water enters the aquifer primarily through the kame-terrace gravels at the valley walls. Regional groundwater flow is generally toward the major rivers.

At the site, groundwater is encountered at approximately 5 to 10 feet below ground surface and generally flows south to southwest.

Geologic cross sections are attached to this SMP as Figures 3A and 3B. A groundwater flow figure is shown in Figure 4.

1.3 Summary of Remedial Investigation Findings

When manufacturing ceased and the underground storage tanks were excavated, sampling revealed the presence of soil and groundwater contamination. A Consent Order (CO) was finalized in September of 1986 which required the responsible party to implement a Remedial Investigation/Feasibility Study (RI/FS) at the site. The results of the RI/FS confirmed the presence of contamination in both soil and groundwater. The RI/FS report was approved by the DEC on October 20, 1989.

A Remedial Investigation (RI) was performed to characterize the nature and extent of contamination at the site. The results of site remedial investigation are described in detail in the following report:

- Remedial Investigation/ Feasibility Report, Final Report, Endicott Johnson Corporation, Franklin Street Property”, O’Brien & Gere Engineers, Inc., July 1989 (revised October 4, 1989)

1.3.1 Soil

Chemical analyses conducted on subsurface soil borings identified detectable concentrations of toluene in the vicinity of the underground tanks and hydraulically downgradient of the tanks. In addition, isolated detectable quantities of 1,1-dichloroethane, 1,2-dichloroethane, benzene, xylene and ethyl benzene were observed.

Toluene was the most prevalent organic found during the subsurface soil investigation, detected in 14 separate boring locations and in a total of 31 of the 35 samples. Values ranged from 0.011 ppm to 37,000 ppm. Most of the contamination was found at approximately 8-12 feet below the ground surface. Figure 2 shows the approximate extent of toluene-contaminated soil detected at the time of the studies.

Other contaminants detected in soil during the investigation, along with the respective maximum concentrations, include: benzene at 230 ppm; ethyl benzene at 0.018 ppm; xylene at 150 ppm; 1,2-dichloroethane at 0.13 ppm; and 1,1-dichloroethane at 0.023 ppm. There is a hypothesis that the low levels of chlorinated solvents may have migrated onto and through the property along historic sewer bedding which intercepts the groundwater table.

1.3.2 Groundwater

Solvents were also detected in site groundwater during the study including: toluene; benzene; ethylbenzene; xylene; chloroethane; 1,1- dichloroethane; and 1,1,1-trichloroethane.

Groundwater quality on the Franklin Street Property was assessed by sampling eight groundwater monitoring wells. Three rounds of samples were collected during the period from October 1986 through November 1987 and the most recent sampling round was in 2006.

The vertical extent of groundwater contamination appears to be in the uppermost portion of the aquifer. The horizontal extent of groundwater contamination appears to be confined mainly to the old tank farm area.

The hydraulically upgradient well had no detectable solvent concentrations. Peripheral wells had detected concentrations of xylene and halogenated compounds, although the concentrations of these solvents were less than 20 parts per billion (ppb.) A well in the deeper till contained no detectable concentrations of these solvents. Only Well 2S, which is located near Franklin Street, exhibited concentrations of solvents above 50 ppb.

Migration of low ppb concentrations of chlorinated solvents within the 48 inch storm sewer bedding was supported by the data generated as part of this study. The groundwater contamination's potential downgradient boundary is limited by a recovery well located south of Franklin Street and operated by IBM Corporation since 1983.

Groundwater samples were collected in 2006 to assess current conditions. The data from this sampling showed that residual contamination remained on-site in the groundwater, primarily in the area of the historic tank farm. (See Appendix D)

1.3.3 Soil Vapor

In 2006 and 2007, soil vapor samples were collected to evaluate of the potential for site-related soil vapor contamination. The data from this sampling showed that contamination existed in on-site soil vapor. (See Appendix E)

1.4 Summary of Remedial Actions

The site was remediated in accordance with the NYSDEC-approved Record of Decision dated November 1, 1990, as modified. The following is a summary of the Remedial Actions performed at the site:

1.4.1 Treatment Systems

A soil vapor extraction (SVE) system was installed in the area of the former tank farm. The SVE system consisted of four extraction wells, five inlet wells and an extraction unit. The area was surrounded by a six foot high chain link fence. The SVE system was installed in 1993 and was operated until 1997. No long-term treatment systems remain as part of the site remedy.

1.4.2 Removal of Contaminated Material

Post-SVE soil sampling in June 1997 revealed one “hot spot” of toluene contamination. The contaminated soil was excavated in October 2002, with 28 cubic yards (41 tons) of soil removed and properly disposed of at the Broome County Landfill.

1.4.3 Remaining Contamination

By October 2002, all required remediation had been completed at the site. However, environmental investigations in 2006 and 2007 revealed some residual groundwater contamination remained at the site as well as associated soil vapor contamination. (See Appendices D and E)

2.0 Engineering and Institutional Control Plan

2.1 Introduction

2.1.1 General

Since remaining contamination exists at the site in groundwater and soil vapor, Institutional Controls (ICs) and, based upon future analysis, the potential for Engineering Controls (ECs) exists. This Engineering and Institutional Control Plan describes the procedures for the implementation and management of all EC/ICs at the site. The EC/IC Plan is one component of the SMP and is subject to revision by NYSDEC.

2.1.2 Purpose

This plan provides:

- A description of all EC/ICs on the site;
- The basic implementation and intended role of each EC/IC;
- A description of the key components of the ICs set forth in the Deed Restriction; and,
- A description of plans and procedures to be followed for implementation of EC/ICs.

2.2 Engineering Controls

2.2.1 Engineering Control Systems

There are currently no engineering controls on the property. Future evaluations, such as an evaluation for the potential for soil vapor intrusion into future structures, may result in the need for, and installation of, engineering controls such as a sub-slab depressurization system.

Procedures for operating and maintaining future engineering controls would be documented in an Operation and Maintenance Plan (Section 4 of this SMP). Procedures for monitoring the system would be included in the Monitoring Plan (Section 3 of this SMP).

2.2.2 Criteria for Termination of Remedial Systems

Generally, remedial processes are considered completed when effectiveness monitoring indicates that the remedy has achieved the remedial action objectives identified by the decision document. The framework for determining when remedial processes are complete is provided in Section 6.6 of NYSDEC DER-10.

2.2.2.1 Sub-slab Depressurization System (SSDS)

An active SSD system, if required for future construction, will not be discontinued unless prior written approval is granted by the NYSDEC. In the event that monitoring data indicates that an SSD system is no longer required, a proposal to

discontinue the SSD system would be submitted by the property owner to the NYSDEC and NYSDOH.

2.3 Institutional Controls – Deed Restriction

The site has a series of Institutional Controls in the form of site restrictions. Adherence to these Institutional Controls is required by the Deed Restriction. Site restrictions that apply to the Controlled Property are:

- The property may only be used for commercial use, which also allows for industrial use, provided that the long-term Engineering and Institutional Controls included in this SMP are employed. Prior to the construction of evaluation will be performed to determine whether any mitigation measures are necessary to eliminate potential exposure to vapors in the proposed structure (See Section 2.3.2);
- All future activities on the property that will disturb remaining contaminated material must be conducted in accordance with this SMP;
- The use of the groundwater underlying the property is prohibited without treatment rendering it safe for intended use; and,
- The site owner or remedial party will submit to NYSDEC a written statement that certifies, under penalty of perjury, that: (1) controls employed at the Controlled Property are unchanged from the previous certification or that any changes to the controls were approved by the NYSDEC; and, (2) nothing has occurred that impairs the ability of the controls to protect public health and environment or that constitute a violation or failure to comply with the SMP. NYSDEC retains the right to access such Controlled Property at any time in order to evaluate the continued maintenance of any and all controls. This certification shall be submitted annually, or an alternate period of time that NYSDEC may allow and will be made by an expert that the NYSDEC finds acceptable.

2.3.1 Soil Vapor Intrusion Evaluation

Prior to the construction of any enclosed structures on the property, a soil vapor intrusion (SVI) evaluation will be performed to determine whether any actions are necessary to address potential exposure to vapors resulting from SVI in the proposed structure. Alternatively, an SVI mitigation system may be installed as an element of the building's construction without first conducting an investigation.

Prior to conducting an SVI investigation or installing a mitigation system, a work plan will be developed and submitted to the NYSDEC and NYSDOH for approval. This work plan will be developed in accordance with the most recent NYSDOH "Guidance for Evaluating Vapor Intrusion in the State of New York". Measures to be employed to mitigate potential vapor intrusion will be evaluated, selected, designed, installed, and maintained based on the SVI evaluation, the NYSDOH guidance, and construction details of the proposed structure.

Preliminary (unvalidated) SVI sampling data will be forwarded to the NYSDEC and NYSDOH for initial review and interpretation. Upon validation, the final data will be transmitted to the agencies, along with a recommendation for follow-up action, such as mitigation.

SVI sampling results, evaluations, and follow-up actions will also be summarized in the next Periodic Review Report.

2.3.2 Excavation Work Plan

Any future intrusive work that may disturb the remaining contamination will be performed in compliance with the Excavation Work Plan (EWP) that is attached as Appendix C to this SMP.

2.4 Inspections and Notifications

2.4.1 Inspections

Inspections of all remedial components installed at the site will be conducted at the frequency specified in the SMP Monitoring Plan schedule. A comprehensive site-

wide inspection will be conducted annually, regardless of the frequency of the Periodic Review Report. The inspections will determine and document the following:

- Whether Engineering Controls, if applicable, continue to perform as designed; and,
- Compliance with requirements of this SMP and the Deed Restriction.

Inspections will be conducted in accordance with the procedures set forth in the Monitoring Plan of this SMP (Section 3). The reporting requirements are outlined in the Periodic Review Reporting section of this plan (Section 5).

2.4.2 Notifications

Notifications will be submitted by the property owner to the NYSDEC for the following reasons:

- 60-day advance notice of any proposed changes in site use, as defined in 6NYCRR Part 375 and/or Environmental Conservation Law. (Procedures for this notification can be found on the NYSDEC's internet web page).
- 7-day advance notice of any proposed ground-intrusive activities pursuant to the Excavation Work Plan.

Any change in the ownership of the site or the responsibility for implementing this SMP will include the following notifications:

- At least 60 days prior to the change, the NYSDEC will be notified in writing of the proposed change. This will include a certification that the prospective purchaser has been provided with a copy of all approved work plans and reports, including this SMP; and,
- Within 15 days after the transfer of all or part of the site, the new owner's name, contact representative, and contact information will be confirmed in writing.

3.0 Site Monitoring Plan

3.1 Introduction

3.1.1 General

The Monitoring Plan describes the measures for evaluating the performance and effectiveness of the controls to minimize exposure to residual contamination at the site. Monitoring of Engineering Controls is described in Chapter 4, Operation, Monitoring and Maintenance Plan. This Monitoring Plan may only be revised with the approval of NYSDEC.

3.1.2 Purpose and Schedule

This Monitoring Plan describes the methods to be used for:

- Evaluating site information periodically to confirm that the controls continue to be effective in protecting public health and the environment; and
- Preparing the necessary reports for the various monitoring activities.

To adequately address these issues, this Monitoring Plan provides information on:

- Reporting requirements; and,
- Annual inspection and periodic certification.

3.2 Site-wide Inspection Plan

Site-wide inspections will be performed on a regular schedule at a minimum of once a year. During each inspection, a written inspection form (Appendix B) will be completed which will document the following:

- Compliance with all ICs, including site usage;
- An evaluation of the condition and continued effectiveness of ECs, if applicable; and,
- General site conditions at the time of the inspection.

4.0 Operation and Maintenance Plan

4.1 Introduction

As of the date of this SMP revision, the site remedy does not rely on any mechanical systems, such as sub-slab depressurization systems or air sparge/soil vapor extraction systems to protect public health and the environment. Therefore, the operation and maintenance of such components is not included in this SMP.

Should future evaluations indicate the need for, and result in the construction of, mechanical systems (such as sub-slab depressurization systems), then this section of the SMP will be modified to include operation and maintenance of such components.

5.0 Inspections, Reporting and Certifications

5.1 Site Inspections

5.1.1 Inspection Frequency

All inspections will be conducted at the frequency specified in the schedules provided in Section 3 Monitoring Plan and Section 4 Operation and Maintenance Plan of this SMP. At a minimum, a site-wide inspection will be conducted annually. Inspections of remedial components, if any, will also be conducted when a breakdown of any treatment system component has occurred or whenever a severe condition has taken place, such as an erosion or flooding event that may affect the ECs.

5.1.2 Inspection Forms, Sampling Data, and Maintenance Reports

All inspections and monitoring events will be recorded on appropriate forms. A general site-wide inspection form will be completed during the site-wide inspection (see Appendix B.) Should future conditions result in the construction of engineering controls (such as sub-slab depressurization systems), additional inspection forms for these systems will be created and included in this SMP. Inspection forms are subject to NYSDEC revision.

All applicable inspection forms and other records, including all media sampling data and system maintenance reports, generated for the site during the reporting period will be provided in electronic format in the Periodic Review Report.

5.1.3 Evaluation of Records and Reporting

The results of the inspection and site monitoring data will be evaluated as part of the EC/IC certification to confirm that the:

- EC/ICs are in place, are performing properly, and remain effective;
- The Monitoring Plan is being implemented; and
- Site conditions continue to be protective of public health and the environment.

5.2 Certification of Institutional Controls

The following signed certification will be included in the Periodic Review Report described below.

For each institutional identified for the site, I certify that all of the following statements are true:

The institutional control employed at this site is unchanged from the date the control was put in place, or last approved by the Department;

Nothing has occurred that would impair the ability of the control to protect the public health and environment;

Nothing has occurred that would constitute a violation or failure to comply with any site management plan for this control;

Access to the site will continue to be provided to the Department to evaluate the remedy, including access to evaluate the continued maintenance of this control;

Use of the site is compliant with the deed restriction;

The information presented in this report is accurate and complete;

I certify that all information and statements in this certification form are true. I understand that a false statement made herein is punishable as a Class “A” misdemeanor, pursuant to Section 210.45 of the Penal Law. I, [name], of [business address], am certifying as [Owner or Owner’s Designated Site Representative] for the site;

No new information has come to my attention, including groundwater monitoring data from wells located at the site boundary, if any, to indicate that the assumptions made in the qualitative exposure assessment of off-site contamination are no longer valid; and

Every five years the following certification will be added:

The assumptions made in the qualitative exposure assessment remain valid.

The signed certification will be included in the Periodic Review Report described below.

5.3 Periodic Review Report

A Periodic Review Report will be submitted to the Department at a frequency determined by the Department, beginning eighteen months after the filing of the deed restriction. In the event that the site is subdivided into separate parcels with different ownership, a single Periodic Review Report will be prepared that addresses the site described in Appendix A (Metes and Bounds). The report will be prepared in accordance with NYSDEC DER-10 and submitted within 45 days of the end of each certification period. Media sampling results, if any, will also be incorporated into the Periodic Review Report. The report will include:

- Identification, assessment and certification of all ECs/ICs required by the remedy for the site;
- Results of the required annual site inspections;
- All applicable inspection forms and other records generated for the site during the reporting period in electronic format; and,
- Results of all analyses, copies of all laboratory data sheets, and the required laboratory data deliverables for all samples collected during the

reporting period, will be submitted electronically in a NYSDEC-approved format.

5.4 Corrective Measures Plan

If the periodic certification cannot be provided due to the failure of an institutional or engineering control, a corrective measures plan will be submitted to the NYSDEC for approval. This plan will explain the failure and provide the details and schedule for performing work necessary to correct the failure. Unless an emergency condition exists, no work will be performed pursuant to the corrective measures plan until it is approved by the NYSDEC.

FIGURES

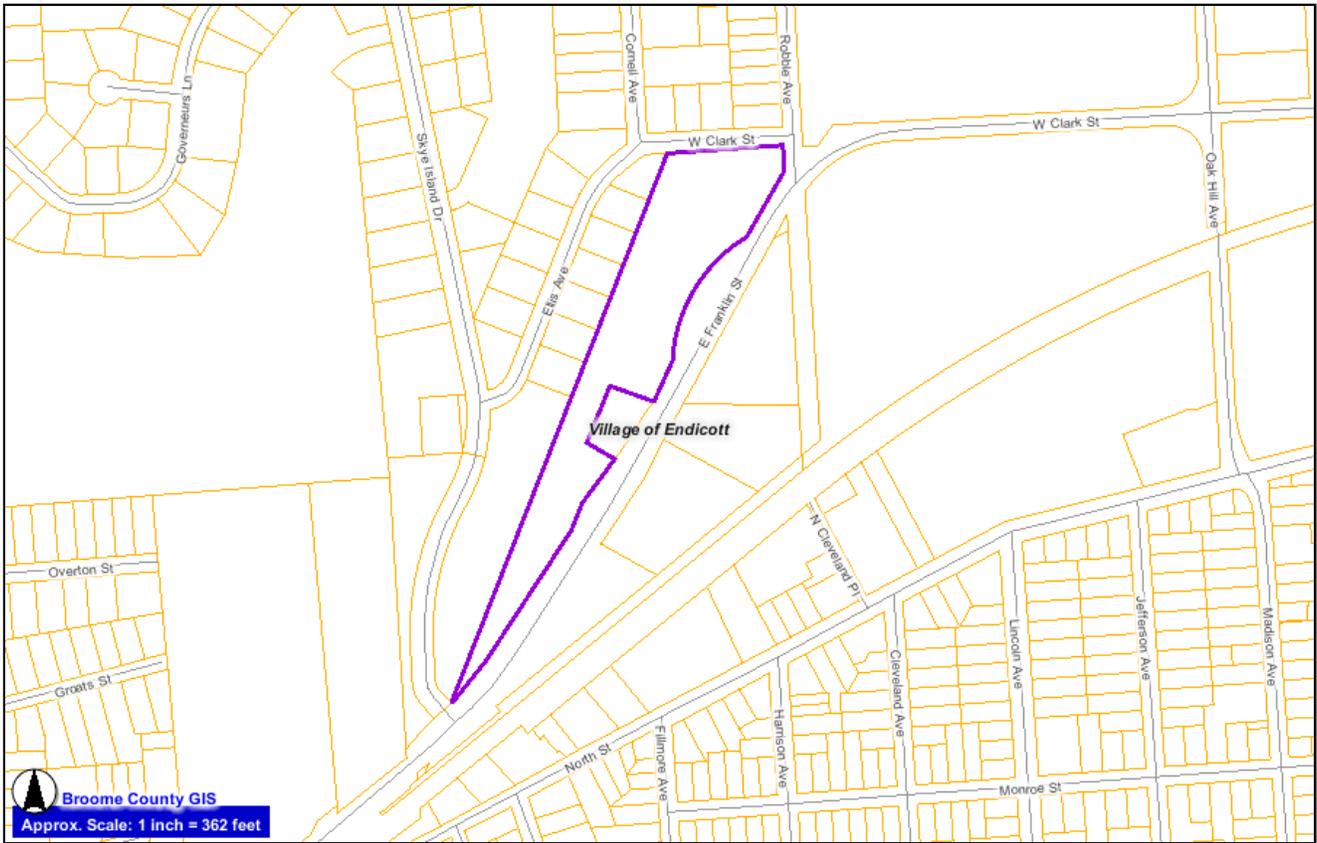


Figure 1

Endicott-Johnson (NYSDEC Site 704018)

Site location and boundaries subject to Site Management Plan plan

Figure 2

Environmental Investigation
Endicott-Johnson, Inc.
Site #704018

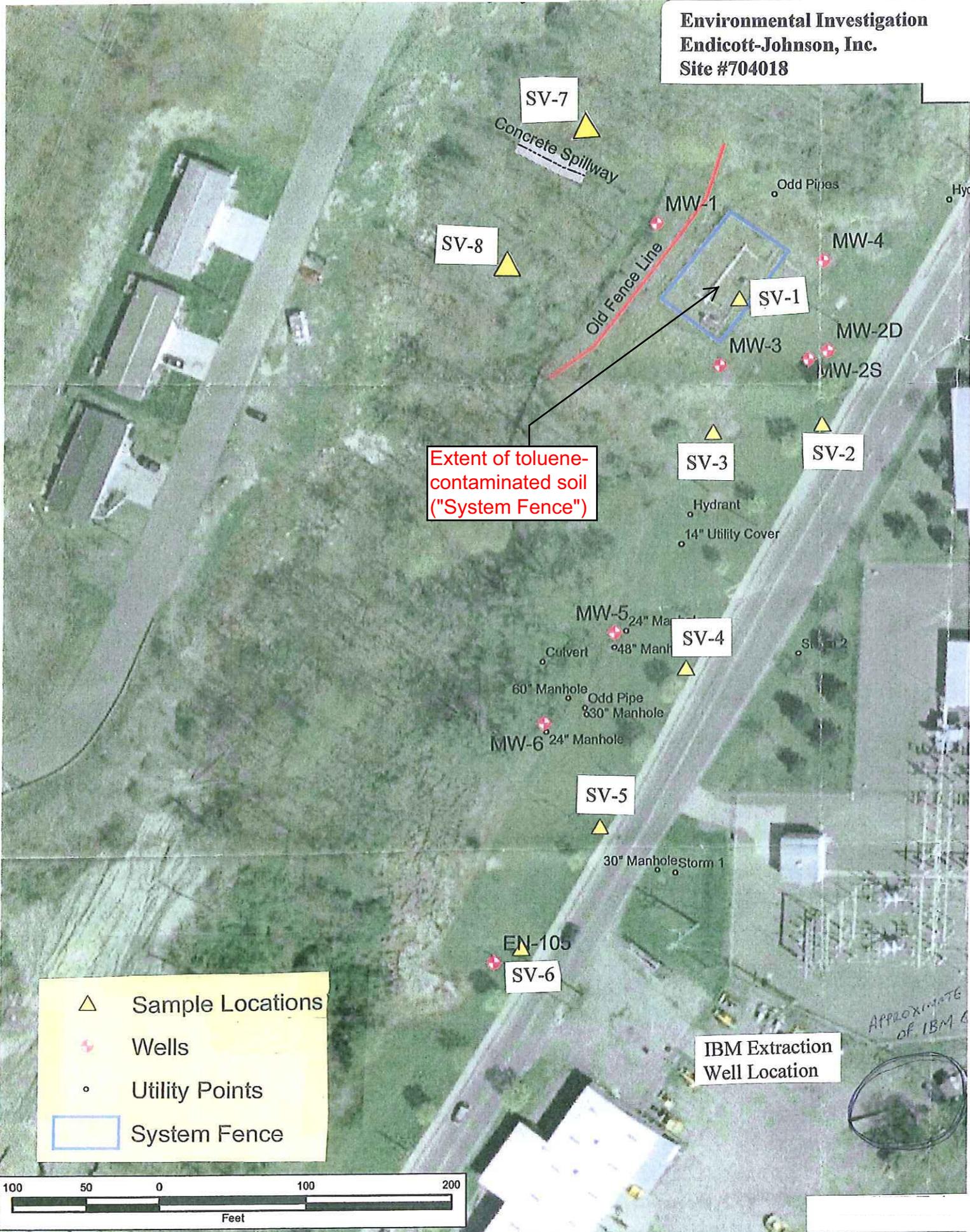
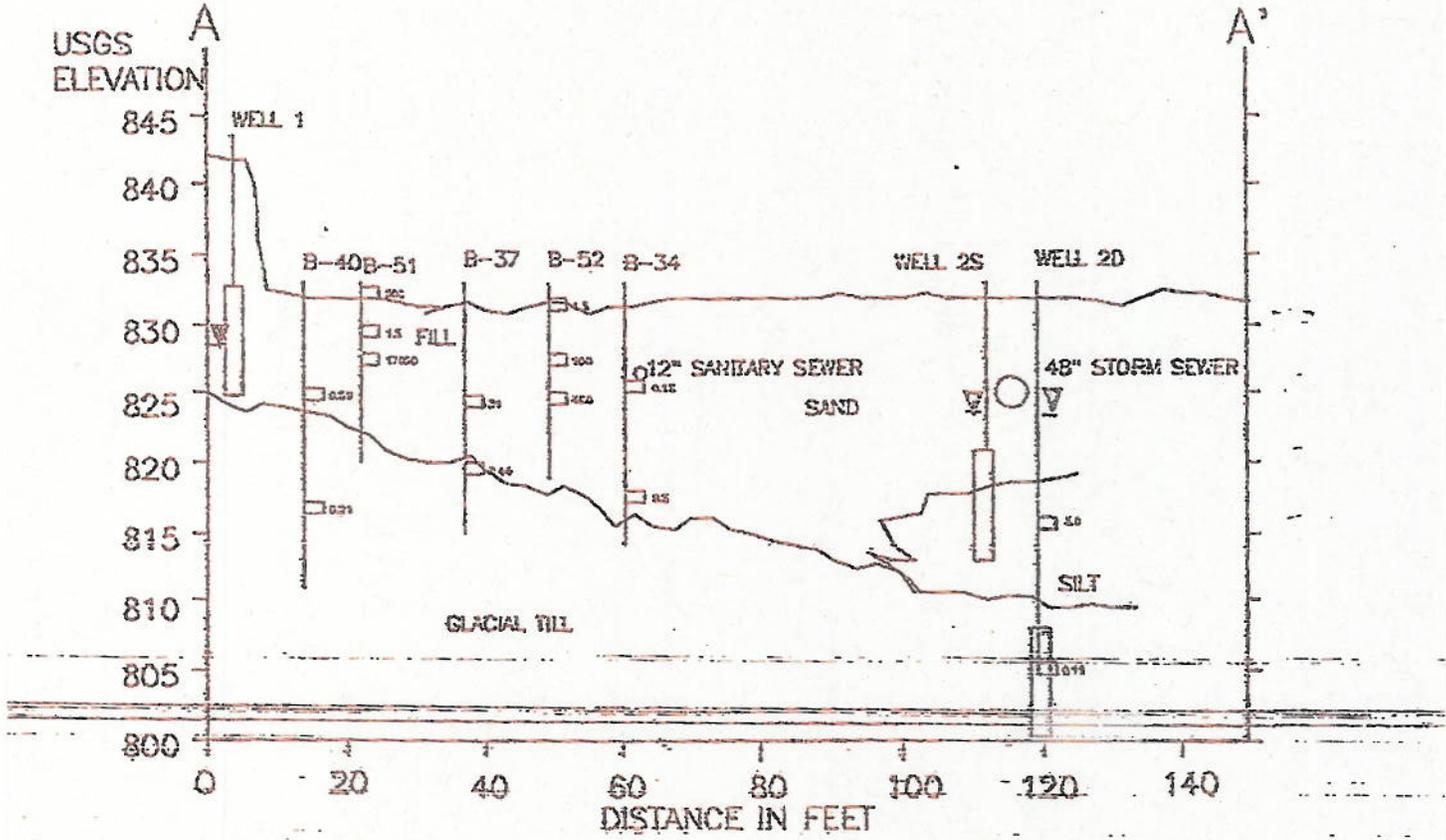


Figure 3A
 Endicott-Johnson (NYSDEC Site 704018)
 East - West Geologic Cross Section

EAST - WEST SECTION

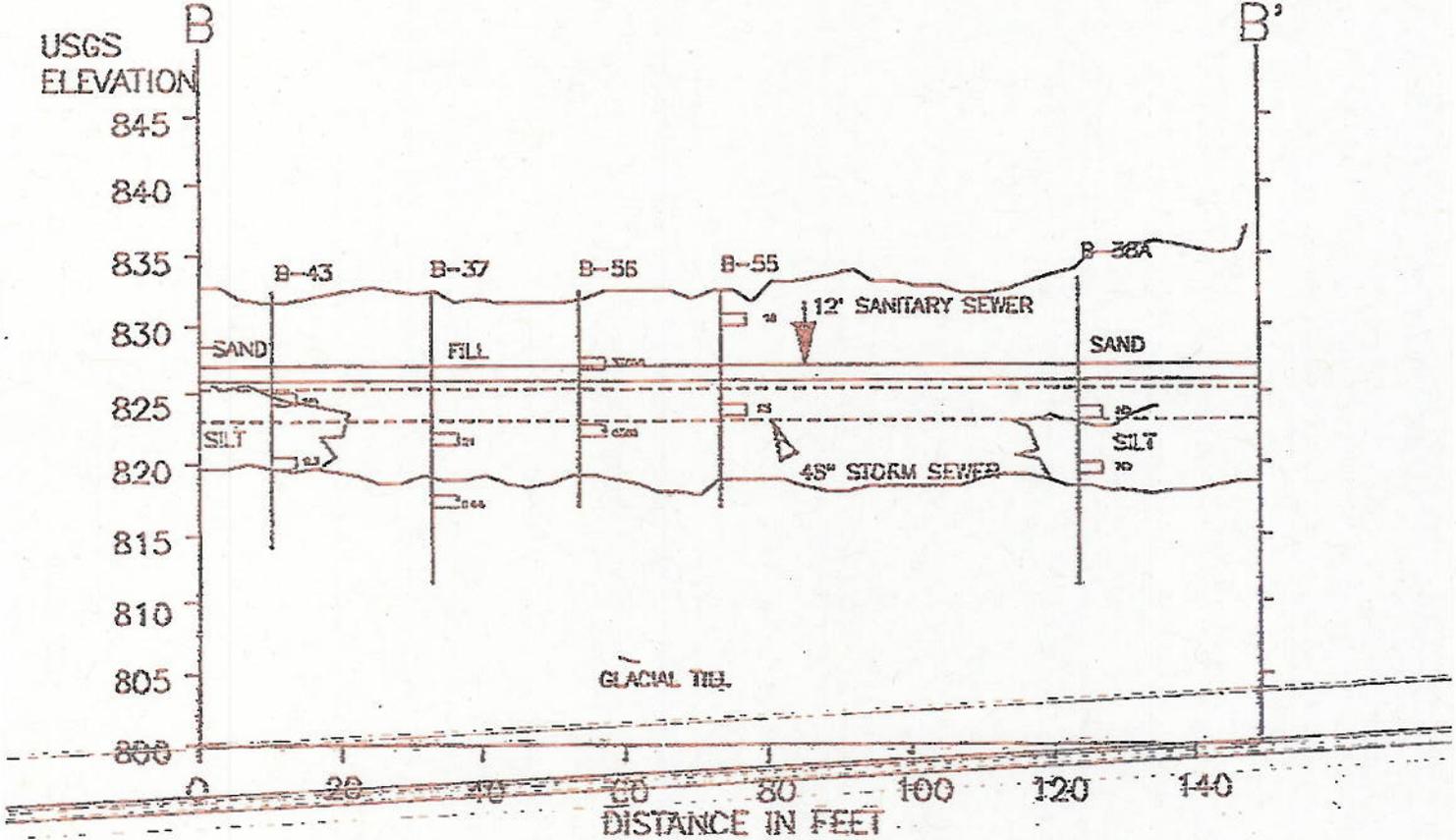


NOTE: MG/KG TOLUENE IN SOIL

▼ WATER LEVEL 8/27/87

Figure 3B
 Endicott-Johnson (NYSDEC Site 704018)
 North - South Geologic Cross Section

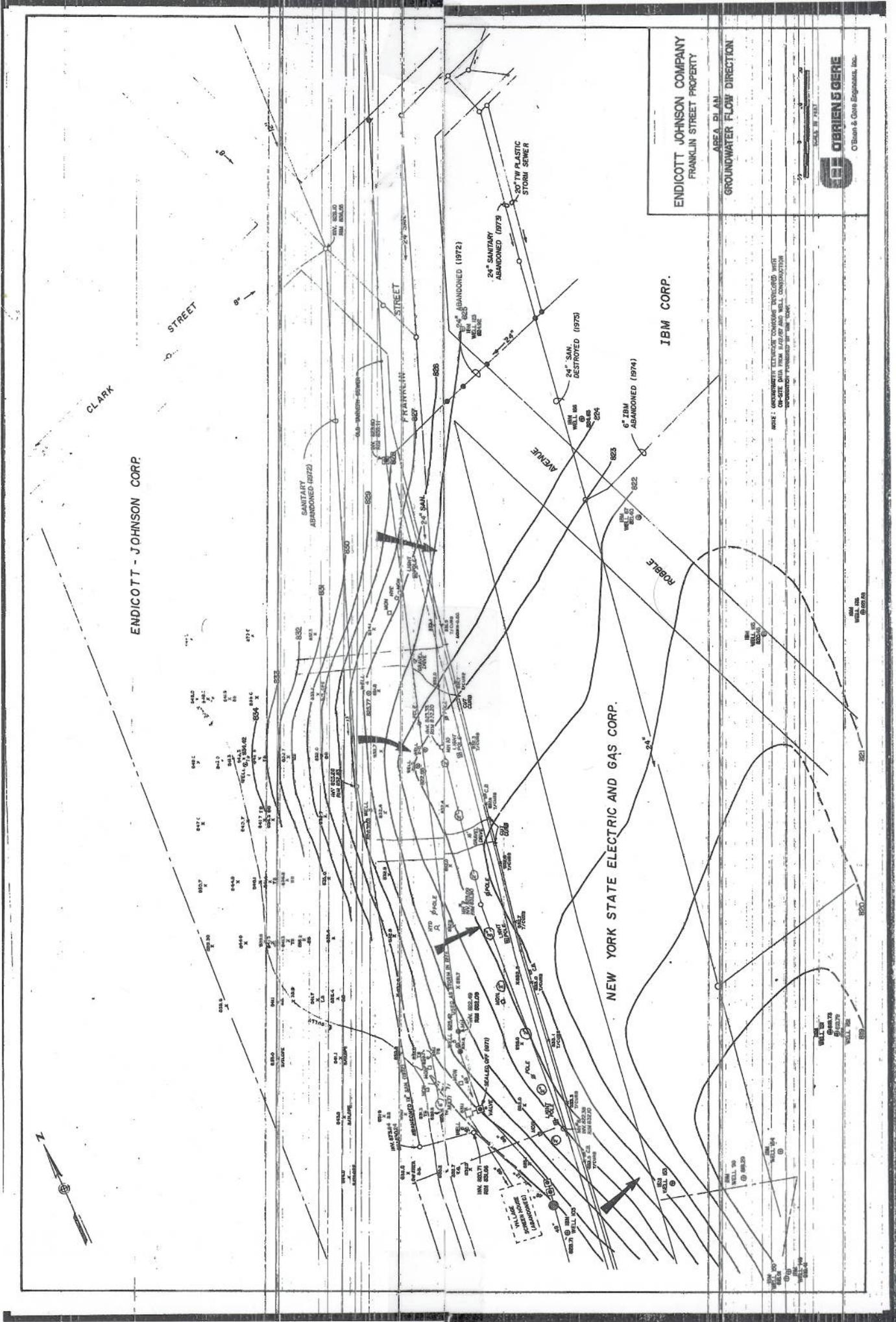
NORTH - SOUTH SECTION



NOTE: MG/KG TOLUENE IN SOIL

WATER LEVEL 8/27/87

Figure 4



Site Management Plan
Endicott-Johnson Site, 901 Franklin Street, Endicott, NY
NYSDEC Site ID 704018

Appendix A

DEED RESTRICTION

(DECLARATION of COVENANTS and RESTRICTIONS)

DECLARATION of COVENANTS and RESTRICTIONS

THIS COVENANT is made the 1st day of March 2010, by the County of Broome, a municipal corporation organized under the Laws of the State of New York and having an office for the transaction of business at Edwin L. Crawford County Office Building, PO Box 1766, Binghamton, New York 13902.

WHEREAS, Endicott Johnson, Inc. is the subject of an Order on Consent executed by Endicott Johnson Corporation as part of the New York State Department of Environmental Conservation's (the "Department's") State Superfund Program, namely that parcel of real property located on Franklin Street in the Village of Endicott, County of Broome, State of New York, which is part of lands conveyed by Kevin Keough, Real Property Tax Director to the County of Broome by deed dated June 3, 2009 in Book 2284 of Deeds at Page 423, and being more particularly described in Appendix "A," attached to this declaration and made a part hereof, and hereinafter referred to as "the Property"; and

WHEREAS, the Department approved a remedy to eliminate or mitigate all significant threats to the environment presented by the contamination disposed at the Property and such remedy requires that the Property be subject to restrictive covenants.

NOW, THEREFORE, the County of Broome, for itself and its successors and/or assigns, covenants that:

First, the Property subject to this Declaration of Covenants and Restrictions is as shown on a map attached to this declaration as Appendix "B" and made a part hereof.

Second, unless prior written approval by the Department or, if the Department shall no longer exist, any New York State agency or agencies subsequently created to protect the environment of the State and the health of the State's citizens, hereinafter referred to as "the Relevant Agency," is first obtained, where contamination remains at the Property subject to the provisions of the Site Management Plan ("SMP"), there shall be no construction, use or occupancy of the Property that results in the disturbance or excavation of the Property which threatens the integrity of the engineering controls or which results in unacceptable human exposure to contaminated soils.

Third, the owner of the Property shall not disturb, remove, or otherwise interfere with the installation, use, operation, and maintenance of engineering controls required for the Remedy, which are described in the SMP, unless in each instance the owner first obtains a written waiver of such prohibition from the Department or Relevant Agency.

Fourth, the owner of the Property shall prohibit the Property from ever being used for purposes other than for commercial or industrial use without the express written waiver of such prohibition by the Relevant Agency.

Fifth, the owner of the Property shall prohibit the use of the groundwater underlying the Property without treatment rendering it safe for drinking water or industrial purposes, as appropriate, unless the user first obtains permission to do so from the Department or Relevant Agency.

Sixth, the owner of the Property shall provide a periodic certification, prepared and submitted by a professional engineer or environmental professional acceptable to the Department or Relevant Agency, which will certify that the institutional and engineering controls put in place are unchanged from the previous certification, comply with the SMP, and have not been impaired.

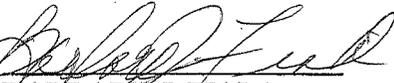
Seventh, the owner of the Property shall continue in full force and effect any institutional and engineering controls required for the Remedy and maintain such controls, unless the owner first obtains permission to discontinue such controls from the Department or Relevant Agency, in compliance with the approved SMP, which is incorporated and made enforceable hereto, subject to modifications as approved by the Department or Relevant Agency.

Eighth, this Declaration is and shall be deemed a covenant that shall run with the land and shall be binding upon the future owners of the Property, and shall provide that the owner and its successors and assigns consent to enforcement by the Department or Relevant Agency of the prohibitions and restrictions that the Order on Consent requires to be recorded, and hereby covenant not to contest the authority of the Relevant Agency to seek enforcement.

Ninth, any deed of conveyance of the Property, or any portion thereof, shall recite, unless the Department or Relevant Agency has consented to the termination of such covenants and restrictions, that said conveyance is subject to this Declaration of Covenants and Restrictions.

IN WITNESS WHEREOF, the undersigned has executed this instrument the day written below.

COUNTY OF BROOME

by 
BARBARA J. FIALA,
County Executive

Approved as to form
By 
BROOME COUNTY
ATTORNEY'S OFFICE

STATE OF NEW YORK)

ss.:

COUNTY OF BROOME)

On the 1 day of March, in the year 2010, before me, the undersigned, personally appeared Rahbata Pinal, personally known to me or proved to me on the basis of satisfactory evidence to be the individual(s) whose name is (are) subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their capacity(ies), and that by his/her/their signature(s) on the instrument, the individual(s), or the person upon behalf of which the individual(s) acted, executed the instrument.

Peter Roseba
Notary Public State of New York

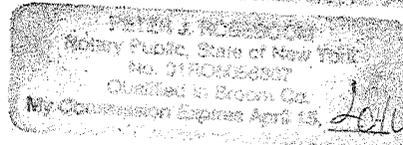


EXHIBIT A

ESB-4

5.468 ACRES OF LAND SITUATE ON FRANKLIN STREET
IN THE VILLAGE OF ENDICOTT, BROOME COUNTY, NY

ALL THAT TRACT OR PARCEL OF LAND situate in the Village of Endicott, County of Broome, and State of New York, bounded and described as follows;

BEGINNING at an iron set in the intersection of the Southerly line of Clark Street and the Westerly line of Robble Avenue, and running THENCE South 20 degrees 38 minutes 52 seconds West along the Westerly line of Robble Avenue, a distance of 61.04 feet to a stone monument found;

THENCE South 54 degrees 52 minutes 46 seconds West along the Northerly line of East Franklin Street, a distance of 186.16 feet to an iron set;

THENCE South 62 degrees 25 minutes 45 seconds West along the Northerly line of East Franklin Street, a distance of 174.60 feet to an iron set;

THENCE Southwestwardly along the Northerly line of East Franklin Street on a curve to the left having a radius of 383.13 feet, a distance of 160.48 feet to an iron set;

THENCE South 38 degrees 25 minutes 45 seconds West along the Northerly line of East Franklin Street, a distance of 56.37 feet to an iron set;

THENCE South 48 degrees 29 minutes 53 seconds West along the Northerly line of East Franklin Street, a distance of 113.95 feet to an iron set;

THENCE South 48 degrees 29 minutes 53 seconds West, along the Northerly line of East Franklin Street, a distance of 1.93 feet to an iron set;

THENCE North 44 degrees 27 minutes 46 seconds West along the Easterly line of the parcel conveyed to the Village of Endicott by Endicott Johnson Corporation by deed dated December 13, 1961, a distance of 111.67 feet to an iron set;

THENCE South 49 degrees 35 minutes 33 seconds West along the Northerly line of said parcel conveyed to the Village of Endicott, a distance of 159.28 feet to an iron set;

EXHIBIT A -continued

ESB-4

THENCE South 37 degrees 04 minutes 16 seconds East along the Westerly line of said parcel conveyed to the Village of Endicott, a distance of 84.90 feet to an iron set;

THENCE South 60 degrees 13 minutes 21 seconds West along the Northerly line of East Franklin Street, a distance of 147.36 feet to a stone monument found;

THENCE South 45 degrees 36 minutes 09 seconds West along the Northerly line of East Franklin Street, a distance of 75.64 feet to a stone monument found;

THENCE South 55 degrees 30 minutes 49 seconds West along the Northerly line of East Franklin Street, a distance of 397.64 feet to a stone monument found;

THENCE South 63 degrees 36 minutes 07 seconds West along the Northerly line of East Franklin Street, a distance of 127.18 feet to a stone monument found;

THENCE South 72 degrees 01 minutes 32 seconds West along the Northerly line of East Franklin Street, a distance of 15.34 feet to an iron set;

THENCE North 44 degrees 58 minutes 57 seconds East along the Easterly line of the lands reputedly of Norfield Estates, a distance of 1525.02 feet to an iron set;

THENCE South 69 degrees 07 minutes 58 seconds East along the Southerly line of Clark Street, a distance of 301.50 feet to the point or place of beginning;

BEING a portion of Parcel No. 11 in a deed from Endicott-Johnson Realty Co. to Endicott Johnson Corporation recorded in the Broome County Clerk's Office on April 18, 1919 in Book 284 of Deeds at Page 580, containing 5.466 acres as surveyed June 4, 1985 by Henry T. Blewer, Jr., P.L.S.;

SUBJECT TO a sanitary sewer easement 15 feet in width conveyed to the Village of Endicott by deed recorded in the Broome County Clerk's Office in Book 1211 of Deeds at Page 891;

ALSO SUBJECT TO a permanent easement designated as Parcel No. 43 conveyed to the Village of Endicott by deed recorded in the Broome County Clerk's Office in Book 1398 of Deeds at Page 185;

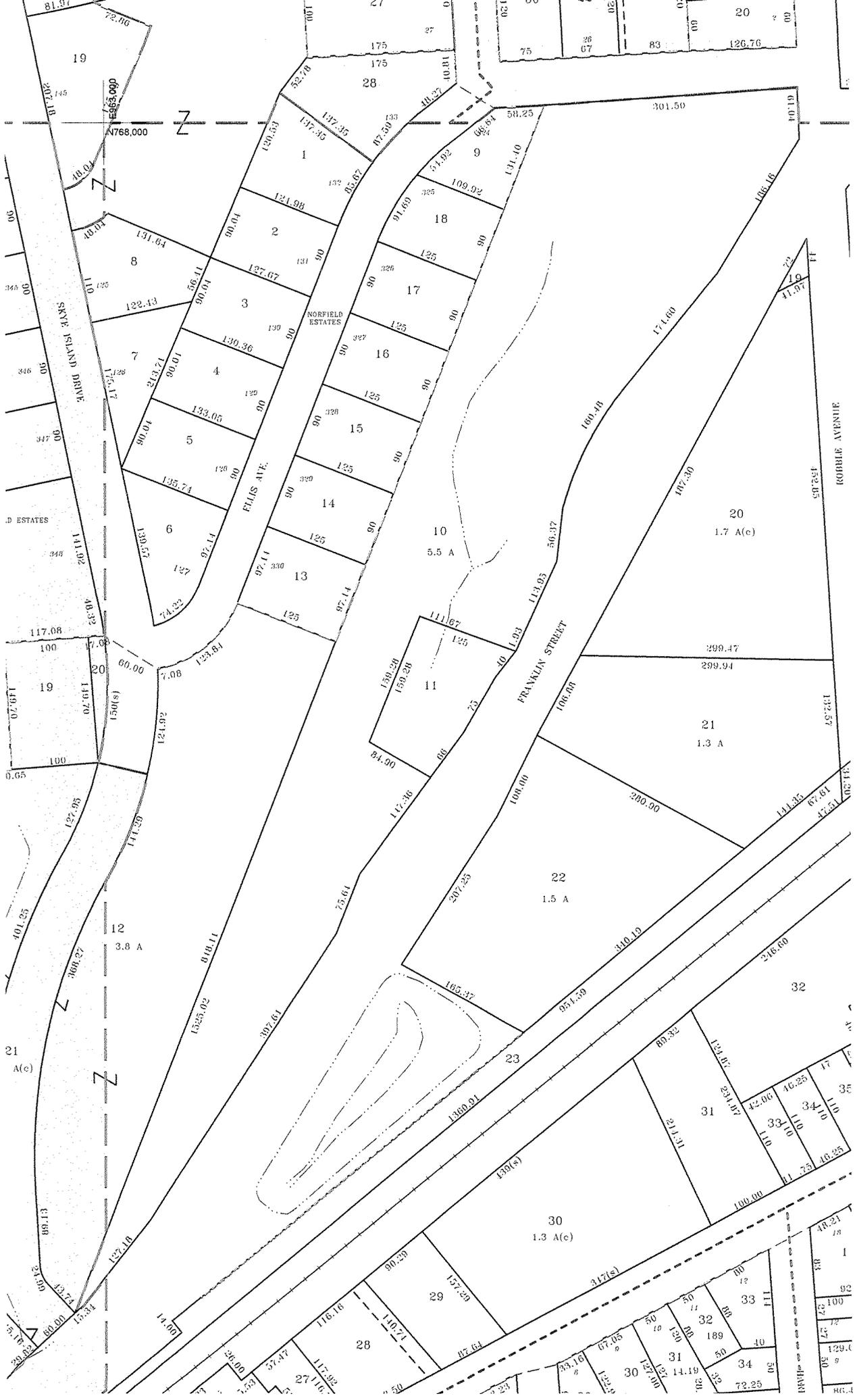
ALSO SUBJECT TO a permanent easement 20 feet in width for the Tannery Sewer conveyed to the Village of Endicott by deed dated February 25, 1974, recorded in the Broome County Clerk's Office in Book 1211 of Deeds at Page 887;

ALSO SUBJECT TO a permanent easement designated as Parcel No. 42 conveyed to the Village of Endicott by deed recorded in the Broome County Clerk's Office in Book 1398 of Deeds at Page 187;

ALSO SUBJECT TO easements 50 feet in width indicated as "Figure 4" and "Figure 5" on Map No. D9354 attached to the deed granting said easements to New York State Electric and Gas Corporation recorded in the Broome County Clerk's Office on February 2, 1970 in Book 1156 of Deeds at Page 451; and to easement granted to said New York State Electric and Gas Corporation by instrument dated December 19, 1985 and recorded *

ALSO SUBJECT TO the rights of others to electric power and telephone lines crossing the above described parcel.

* in the Broome County Clerk's Office in Book 1504 of Deeds at Page 451.



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1768,000

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STATE ISLAND DRIVE

ELIAS AVE.

PRAVALIN STREET

ROBBIE AVENUE

NORFIELD ESTATES

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Site Management Plan
Endicott-Johnson Site, 901 Franklin Street, Endicott, NY
NYSDEC Site ID 704018

Appendix B

ANNUAL SITE INSPECTION FORM

Annual Site Inspection Form (Page 1 of 2)

Date of Inspection: _____

Time of Inspection: _____

Person(s) Conducting Inspection:

Printed Name	Title	Organization

Site Information

NYSDEC Site ID#: _____

Site Description:

Site Contact: _____

Printed Name	Organization	Phone #

Site Specific Institutional Controls:

- The property may only be used for commercial or industrial purposes
- Any development or change of use of the property must be preceded by a “Change of Use” notification to the Department as required by regulation. Any person responsible for construction or excavation activities at the Site should follow the prior notification procedures found in Section 2.4 and Appendix A of the Site Management Plan.
- Use of the groundwater from the Site is prohibited unless properly treated, as necessary, and permission is obtained from the NYSDEC or Relevant Agency.
- Periodic certification to the Department will be required to certify that the controls put in place are unchanged from the previous certification, and that there is continued compliance with the Site Management Plan.

Annual Site Inspection Form (Page 2 of 2)

Land Use Designation: Commercial / Industrial

Current Land Use: _____

Are the Institutional Controls operational and functional? Y N

Is current use of the property limited to commercial or industrial purposes? _____

Is anyone using groundwater extracted from the Site? _____

 If yes to above, was prior approval received from the NYSDEC? _____

Has there been any site excavation, construction or development the past year? _____

 If yes to above, did notification to the NYSDEC precede any activities? _____

OBSERVATIONS:

DEFICIENCIES:

RECOMMENDATIONS:

Photograph Information: (Identify time, location and compass orientation of photographs taken)

Photo 1: _____

Photo 2: _____

Any Additional Information:

Site Management Plan
Endicott-Johnson Site, 901 Franklin Street, Endicott, NY
NYSDEC Site ID 704018

Appendix C

EXCAVATION WORK PLAN

APPENDIX C – EXCAVATION WORK PLAN (EWP)

C-1 NOTIFICATION

At least 7 days prior to the start of any activity that is anticipated to encounter remaining contamination, the site owner or their representative will notify the Department. Currently, this notification will be made to:

Mr. Harry Warner
Regional Hazardous Waste Remediation Engineer
NYSDEC Region 7
615 Erie Blvd. West
Syracuse, NY 13204

This notification will include:

- A detailed description of the work to be performed, including the location and areal extent, plans for site re-grading, intrusive elements or utilities to be installed below the soil cover, estimated volumes of contaminated soil to be excavated and any work that may impact an engineering control,
- A summary of environmental conditions anticipated in the work areas, and plans for any pre-construction sampling;
- A schedule for the work, detailing the start and completion of all intrusive work,
- A summary of the applicable components of this EWP,
- A statement that the work will be performed in compliance with this EWP and 29 CFR 1910.120,
- A copy of the contractor's health and safety plan, in electronic format,
- Identification of disposal facilities for potential waste streams,

- Identification of sources of any anticipated backfill, along with all required chemical testing results.

C-2 SOIL SCREENING METHODS

Visual, olfactory and instrument-based soil screening will be performed by a qualified environmental professional during all excavations into known or potentially contaminated material (remaining contamination).

Soils will be segregated based on previous environmental data and screening results into material that requires off-site disposal, material that requires testing, material that can be returned to the subsurface, and material that can be used as cover soil.

C-3 MATERIALS DISPOSAL OFF-SITE

All soil/fill/solid waste excavated and removed from the site will be treated as contaminated and regulated material unless demonstrated otherwise. If disposal of soil/fill from this site is proposed for unregulated off-site disposal (i.e. clean soil removed for development purposes), a formal request with an associated plan will be made to the NYSDEC. Unregulated off-site management of materials from this site will not occur without formal NYSDEC approval.

Off-site disposal locations for excavated soils will be identified in the pre-excavation notification. This will include estimated quantities and a breakdown by class of disposal facility if appropriate, i.e. hazardous waste disposal facility, solid waste landfill, petroleum treatment facility, C/D recycling facility, etc. Actual disposal quantities and associated documentation will be reported to the NYSDEC in the Periodic Review Report. This documentation will include: waste profiles, test results, facility acceptance letters, manifests, bills of lading and facility receipts.

Non-hazardous historic fill and contaminated soils taken off-site will be handled, at minimum, as a Municipal Solid Waste per 6NYCRR Part 360-1.2. Material that does not meet Track 1 unrestricted SCOs is prohibited from being taken to a New York State recycling facility (6NYCRR Part 360-16 Registration Facility).

C-4 MATERIALS REUSE ON-SITE

Chemical criteria for on-site reuse of material have been approved by NYSDEC and are listed in 6NYCRR Part 375.

C-5 FLUIDS MANAGEMENT

All liquids to be removed from the site, including excavation dewatering and groundwater monitoring well purge and development waters, will be handled, transported and disposed in accordance with applicable local, State, and Federal regulations.

Dewatering, purge and development fluids will not be recharged back to the land surface or subsurface of the site without prior approval from the NYSDEC

Discharge of water generated during large-scale construction activities to surface waters (i.e. a local pond, stream or river) will be performed under a SPDES permit.

C-6 BACKFILL FROM OFF-SITE SOURCES

All materials proposed for import onto the site will be approved by the qualified environmental professional and will be in compliance with provisions in this SMP prior to receipt at the site.

Material from industrial sites, spill sites, or other environmental remediation sites or potentially contaminated sites will not be imported to the site.

All imported soils will meet the backfill and cover soil quality standards established in 6NYCRR 375-6.7(d), based on an evaluation of the land use, protection of groundwater and protection of ecological resources criteria. Soils that meet 'exempt' fill requirements under 6 NYCRR Part 360, but do not meet backfill or cover soil objectives for this site, will not be imported onto the site without prior approval by NYSDEC. Solid waste will not be imported onto the site.

Trucks entering the site with imported soils will be securely covered with tight fitting covers. Imported soils will be stockpiled separately from excavated materials and covered to prevent dust releases.

C-7 CONTINGENCY PLAN

If underground tanks or other previously unidentified contaminant sources are found during post-remedial subsurface excavations or development related construction, excavation activities will be suspended until sufficient equipment is mobilized to address the condition.

Sampling will be performed on product, sediment and surrounding soils, etc. as necessary to determine the nature of the material and proper disposal method. Chemical analysis will be performed for full a full list of analytes (TAL metals; TCL volatiles and semi-volatiles, TCL pesticides and PCBs), unless the site history and previous sampling results provide a sufficient justification to limit the list of analytes. In this case, a reduced list of analytes will be proposed to the NYSDEC for approval prior to sampling.

Identification of unknown or unexpected contaminated media identified by screening during invasive site work will be promptly communicated by phone to NYSDEC's Project Manager. Reportable quantities of petroleum product will also be reported to the NYSDEC spills hotline. These findings will be also included in the periodic reports prepared pursuant to Section 5 of the SMP.

Site Management Plan
Endicott-Johnson Site, 901 Franklin Street, Endicott, NY
NYSDEC Site ID 704018

Appendix D

Environmental Investigation Report
Endicott-Johnson, Inc., Site #704018
FRANKLIN STREET
ENDICOTT, NEW YORK
November 1, 2006

Environmental Investigation Report

Endicott-Johnson, Inc., Site #704018

**FRANKLIN STREET
ENDICOTT, NEW YORK**

November 1, 2006

**JOHNSON HEALTH AND SAFETY, LLC
1480 IRONWOOD DRIVE
GREENBRIER, TN 37073**

**www.johnsonhealthandsafety.com
(615) 943-6199**

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5.0 CONCLUSIONS AND RECOMMENDATIONS	8

FIGURES

- FIGURE 1** Aerial Photo of Site with Sample Locations
FIGURE 2 Groundwater Elevation Data and Groundwater Flow Direction

TABLES

- TABLE 1** Monitoring Well and Soil Vapor Implant Groundwater Lab Results
TABLE 2 Soil Vapor Implant Air Lab Results
TABLE 3 Groundwater Monitoring Well Field Data
TABLE 4 Soil Vapor Implant Field Data
TABLE 5 Monitoring Well and Soil Vapor Implant Groundwater Elevation Data

APPENDICIES

- APPENDIX 1** Buck Environmental Lab Reports – Groundwater Monitoring Results
APPENDIX 2 Centek Labs – Soil Vapor Monitoring Results
APPENDIX 3 Site Photo Log

1.0 INTRODUCTION

NYSDEC requested that additional work and environmental sampling be performed at the Endicott-Johnson (EJ) property in Endicott, New York for two reasons: to support EJ's petition to delist the site from the NYSDEC's registry of inactive hazardous waste sites and to comply with the NYDEC's request to investigate the potential for contamination in the site's soil vapor. Although EJ completed all of the required activities under the ROD, as amended, EJ agreed to perform this additional sampling without waiving any defenses that EJ may have regarding the NYSDEC's authority to compel EJ to perform this additional work.

A Work Plan was submitted for State acceptance in order to gather the data necessary to resolve outstanding questions at the EJ property. With clarifications, NYSDEC accepted the Work Plan in a letter dated 9/6/06.

The site fieldwork and sampling was completed on September 25-26, 2006. David Johnson of Johnson Health and Safety, LLC and John Strang of NYSDEC supervised all onsite preparation and sampling activities. A geoprobe unit was used at six strategic locations to collect both soil gas and groundwater. The seven existing groundwater wells on the subject property were sampled. Geologic NY, Inc. and Gary Dyer Inc. were the local contractors that were used to perform the fieldwork at the site. The laboratory used to conduct sample analyses for groundwater was Buck Environmental Labs, Inc. The laboratory used to conduct soil vapor analyses was Centek Laboratories, LLC.

The geoprobe locations focused on the tank removal area (**SV1**), which was the focus of past remedial activities; the former location of the plant building where waste management may have occurred (**SV2**); the area immediately upgradient of an IBM extraction well that may be collecting contamination from an upgradient source (**SV6**); and along a line on the north side of Franklin Street, which is presumed to be the downgradient edge of the EJ property (**SV3-SV5**). **Figure 1** is an aerial photo depicting these soil vapor implant locations and the monitoring well locations. **Figure 2** is a site map illustrating groundwater elevation data and the predicted groundwater flow direction.

2.0 EXECUTIVE SUMMARY

An environmental investigation at the Endicott-Johnson (EJ) property in Endicott, New York (NYSDEC Site #704018) was completed to support EJ's petition to delist the site from the NYSDEC's registry of inactive hazardous waste sites and to investigate the potential for contamination in the site's soil vapor.

Although EJ completed all of the required activities under the ROD, as amended, EJ agreed to perform this additional sampling without waiving any defenses that EJ may have regarding the NYSDEC's authority to compel EJ to perform this additional work.

The site fieldwork and sampling was completed on September 25-26, 2006. David Johnson of Johnson Health and Safety, LLC and John Strang of NYSDEC supervised all onsite fieldwork and sampling activities in accordance with the approved Work Plan.

There were no volatiles or semi-volatiles detected above laboratory detection limits in the seven (7) existing groundwater monitoring wells (see **Figures 1 and 2**), with the exception of one contaminant detected in well MW3. 1,2-Dichloroethane was detected at a concentration of 14 ug/L at well MW3 (see **Table 1**).

The soil vapor implant groundwater and soil vapor sampling results indicate that the volatile contaminants of concern are primarily localized in the small area comprising the system fence (see **Figures 1 and 2** and **Tables 1 and 2**), which is the previous location of solvent underground storage tanks and the vacuum extraction remediation effort. **SV-1** is the identifier for the soil vapor implant groundwater and soil vapor sampling location inside of the system fence. Of the six (6) soil vapor implant locations, **SV-1** contained most all of the groundwater contaminant hits, with Toluene having the highest concentration at 1,700 ug/L. The second highest groundwater concentration detected at **SV-1** was Chloroform at 270 ug/L. The soil vapor gas contaminant concentrations at **SV-1** were, for the most part, much higher as compared with the other five (5) locations (see **Table 2**).

There was no apparent correlation between the soil vapor implant groundwater results and the soil vapor results. From the groundwater results, there is not indication that the contaminants of concern have migrated significantly from the localized area comprising the system fence (see **Figures 1 and 2**.)

With completion of the environmental investigation, Endicott-Johnson, Inc. requests that the NYSDEC re-review EJ's petition to delist the site from the NYSDEC's registry of inactive hazardous waste sites.

3.0 GROUNDWATER AND SOIL VAPOR MONITORING

3.1 Sample Locations and Purpose of Sample Locations

The seven existing groundwater, monitoring wells at the site were sampled. The respective wells are identified as MW-1, MW-2S, MW-2D, MW-3, MW-4, MW-5 and MW-6 on **Figures 1 and 2**.

Six strategic geoprobe/soil probes with installation of soil vapor implants to collect both soil gas (SV-1-SV-6) and groundwater (SV-1W – SV-6W) were located as follows:

- 1) **(SV-1, SV-1W)** Western most sample inside of former “System Fence” to focus on the tank removal area, which was where past remedial activities occurred to show that the remedial activities were successful;
- 2) **(SV-2, SV-2W)** East of “System Fence” near location of former plant building where waste management may have occurred to show that there is no contamination in this particular area;
- 3) **(SV-3, SV-3W; SV-4, SV-4W; SV-5, SV-5W)** Three samples evenly spaced along a line on the North side of Franklin Street, which is the presumed downgradient edge of the EJ property to show that there is no contamination migrating downgradient and off site;
- 4) **(SV-6, SV-6W)** Eastern most sample, also along a line on the North side of Franklin Street, to focus on area immediately upgradient of an IBM extraction well to show that the well is not collecting contamination from an upgradient source, such as the EJ property.

The six soil probes ranged in depth from 4 to 10.5 feet pending impact with groundwater. See **Tables 3-5** for groundwater and soil vapor field data and elevation data. See **Figures 1 and 2** for the approximate location of each of the proposed soil probes / soil vapor implants.

3.2 Sampling Methodology and Laboratory Methods

3.21 GROUNDWATER MONITORING WELL SAMPLING METHODOLOGY

From the top of the casing, the hang depth to groundwater was measured and the groundwater elevation was determined from the differential leveling survey data. With the known depth of the well factored, the volume of water in the well was calculated. Using a disposable polyethylene bailer, three times the well volume was purged or the well was purged until dry. After the well recharged, groundwater samples were taken.

The groundwater sample collected in the bailer was poured or discharged directly into the laboratory sample vials/jars and kept chilled until delivery to the analytical laboratory. Chain of custody procedures were followed throughout sample collection and delivery.

3.22 GROUNDWATER AND SOIL VAPOR IMPLANT SAMPLING METHODOLOGY USING HYDRAULIC PROBES

The hydraulic probe holes were advanced utilizing a truck mounted hydraulic probe. The probe holes were advanced using 1-inch diameter probe rods. The probe rods were driven by a hydraulic-hammer that delivers 1,800 blows per minute.

The probe rods were driven with an expendable point placed in the end of the lead rod until groundwater was encountered. The rods were then retracted several feet. Groundwater samples were obtained using polyethylene tubing connected to a peristaltic pump.

The groundwater samples were collected directly into the laboratory sample vials/jars and kept chilled until delivery to the analytical laboratory. Chain of custody procedures were followed throughout sample collection and delivery. The probing equipment was cleaned with a liquinox and water solution before starting work at the site and between each boring to minimize the possibility of cross contamination.

The hydraulic probe was then used to install temporary soil vapor implants. Soil vapor implants were constructed of inch-inch long, stainless steel mesh. The stainless steel implants were connected to polyethylene tubing. The direct-push sampling rod was advanced to the desired depths, which was approximately 1-foot above the groundwater elevation. The soil vapor implant was placed down through the rods, and then as the rods are withdrawn, the annular space around the implant was filled with sand to a height of 30 inches or so above the implant. Hydrated, bentonite pellets were used to seal the upper two or so feet of the annular space.

The polyethylene tubing initially extended at least six inches above the ground surface. To minimize the risk of ambient air being drawn down the borehole and into the implant during sampling, hydrated bentonite was placed on the ground surface around the tubing with an approximate 9-inch radius. A 3-foot square piece of plastic sheeting was placed over the bentonite. On top of the plastic sheeting, another bentonite seal was placed immediately surrounding where the plastic tubing projected through the plastic sheeting.

To verify that the soil vapor samples were not diluted with ambient air, helium was used as a tracer. A vessel was placed on top of the plastic sheet over the tubing and bentonite was used to seal the rim of the vessel. The implant tubing was immediately connected to the helium detector. Helium was then released into the vessel and allowed to stand several minutes to assure that helium was not detected from the implant.

One-Liter mini-canisters were used to collect the soil vapor samples. Before collecting the soil vapor samples, the soil vapor implant and tubing was purged of air using a PID. Immediately after purging, the tubing was connected to the 1-Liter canister and the soil vapor sample was collected directly into the canister for laboratory analysis. The samples were collected over approximately a 1-hour period.

The soil vapor samples were analyzed for TO-15 compounds (see **Appendix 2** for a list of the 63 compounds and the minimum reporting limits) utilizing EPA method TO-15 with a Limit of Quantitation (LOQ) of 1 µg/m³.

The groundwater samples from the soil vapor implants and the seven existing groundwater wells were analyzed for full scan EPA 8260 volatiles and EPA 8270 semi-volatiles using EPA SW846 Methods 8260 and 8270 (see **Appendix 1** for a list of the intended analytes and the minimum reporting limits).

3.3 Groundwater Elevations

During the soil vapor and groundwater sampling effort, a synoptic round of groundwater elevations was collected and a groundwater flow direction was determined. The groundwater flow direction appears to be to the South toward the river from the elevation data gathered. The groundwater elevations and groundwater flow direction are illustrated in **Figure 2**.

3.31 SURVEY METHODOLOGY

Elevations of the ground surface of the temporary soil vapor implants and the top of casing elevation of the groundwater monitoring wells were determined by differential leveling.

The top of casing for IBM monitoring well EN150 with an established elevation of 834.60 was used as a benchmark.

3.4 Work Schedule

After State review and approval of the Work Plan, the onsite fieldwork and sampling was completed on Monday, September 25 and Tuesday, September 26, 2006. The groundwater and soil vapor sample results were received from subcontractor, Geologic, Inc. on October 19, 2006.

4.0 FINDINGS AND OBSERVATIONS

The site fieldwork and sampling was completed in accordance with the approved Work Plan on September 25-26, 2006. David Johnson of Johnson Health and Safety, LLC and John Strang of NYSDEC supervised all onsite fieldwork and sampling activities.

There were no hindrances due to inclement weather or equipment malfunction and the fieldwork and sampling was completed on schedule. The groundwater elevations measured at the existing monitoring wells indicate a groundwater flow direction to the South toward the IBM property (see **Table 2**).

There were no volatiles or semi-volatiles detected above laboratory detection limits in the seven (7) existing groundwater monitoring wells (see **Figures 1 and 2**), with the exception of one contaminant detected in well MW3. 1,2-Dichloroethane was detected at a concentration of 14 ug/L at well MW3 (see **Table 1**).

The soil vapor implant groundwater and soil vapor sampling results indicate that the volatile contaminants of concern are primarily localized in the small area comprising the system fence (see **Figures 1 and 2** and **Tables 1 and 2**), which is the previous location of solvent underground storage tanks and the vacuum extraction remediation effort. **SV-1** is the identifier for the soil vapor implant groundwater and soil vapor sampling location inside of the system fence. Of the six (6) soil vapor implant locations, **SV-1** contained most all of the groundwater contaminant hits, with Toluene having the highest concentration at 1,700 ug/L. The second highest groundwater concentration detected at **SV-1** was Chloroform at 270 ug/L. The soil vapor gas contaminant concentrations at **SV-1** were, for the most part, higher as compared with the other five (5) locations (see **Table 2**).

There was no apparent correlation between the soil vapor implant groundwater results and the soil vapor results. From the groundwater results, there is not indication that the contaminants of concern have migrated significantly from the localized area comprising the system fence (see **Figures 1 and 2**.)

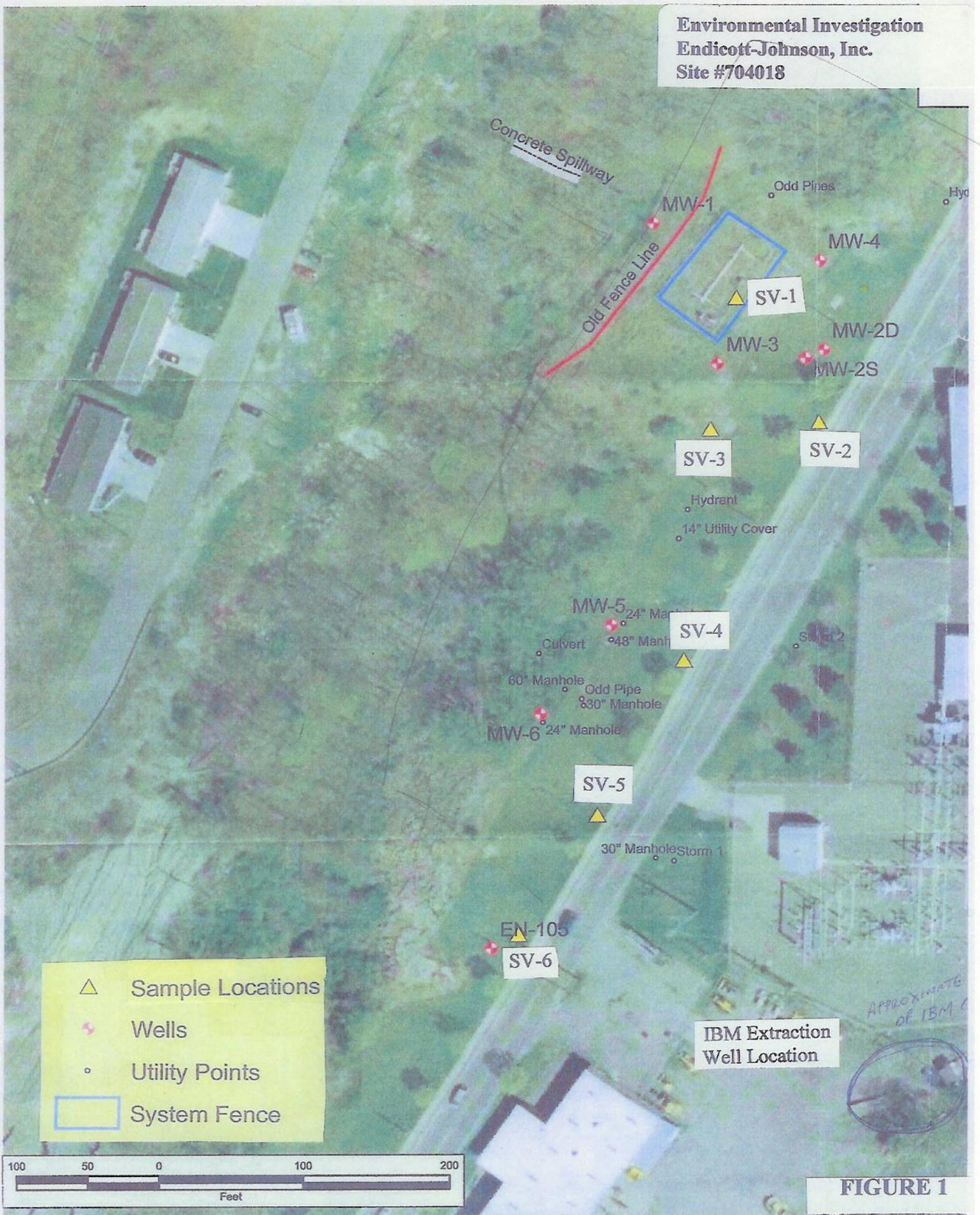
5.0 CONCLUSIONS AND RECOMMENDATIONS

The NYSDEC's letter from P. David Smith dated August 5, 2005 requested that Endicott-Johnson, Inc. (EJ - Site No. 704018) participate in conducting a soil vapor intrusion evaluation at the site. Endicott-Johnson, Inc. agreed to participate and developed an Environmental Work Plan dated August 9, 2006, which was approved by NYSDEC with certain clarifications in a letter from James A. Quinn dated September 6, 2006. Although EJ completed all of the required activities under the ROD, as amended, EJ agreed to perform this additional sampling without waiving any defenses that EJ may have regarding the NYSDEC's authority to compel EJ to perform this additional work.

With completion of the approved Environmental Work Plan, as illustrated within this report, Endicott-Johnson, Inc. (EJ) requests that the NYSDEC re-review EJ's petition to delist the site from the NYSDEC's registry of inactive hazardous waste sites.

FIGURES

**Environmental Investigation
Endicott-Johnson, Inc.
Site #704018**



-  Sample Locations
-  Wells
-  Utility Points
-  System Fence

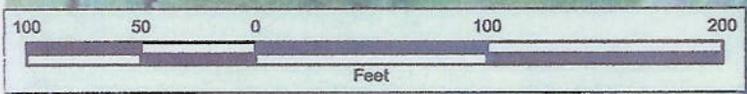
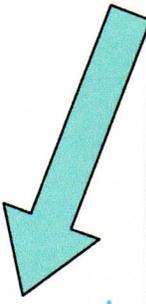


FIGURE 1

GROUNDWATER ELEVATIONS AND FLOW DIRECTION



PREDICTED GROUNDWATER FLOW DIRECTION
BASED UPON MW GROUNDWATER ELEVATIONS



ENVIRONMENTAL INVESTIGATION ENDICOTT-JOHNSON, INC. SITE #704018

-  SOIL VAPOR IMPLANT LOCATIONS
-  GW MONITORING WELL LOCATIONS
-  SYSTEM FENCE

NOT TO SCALE

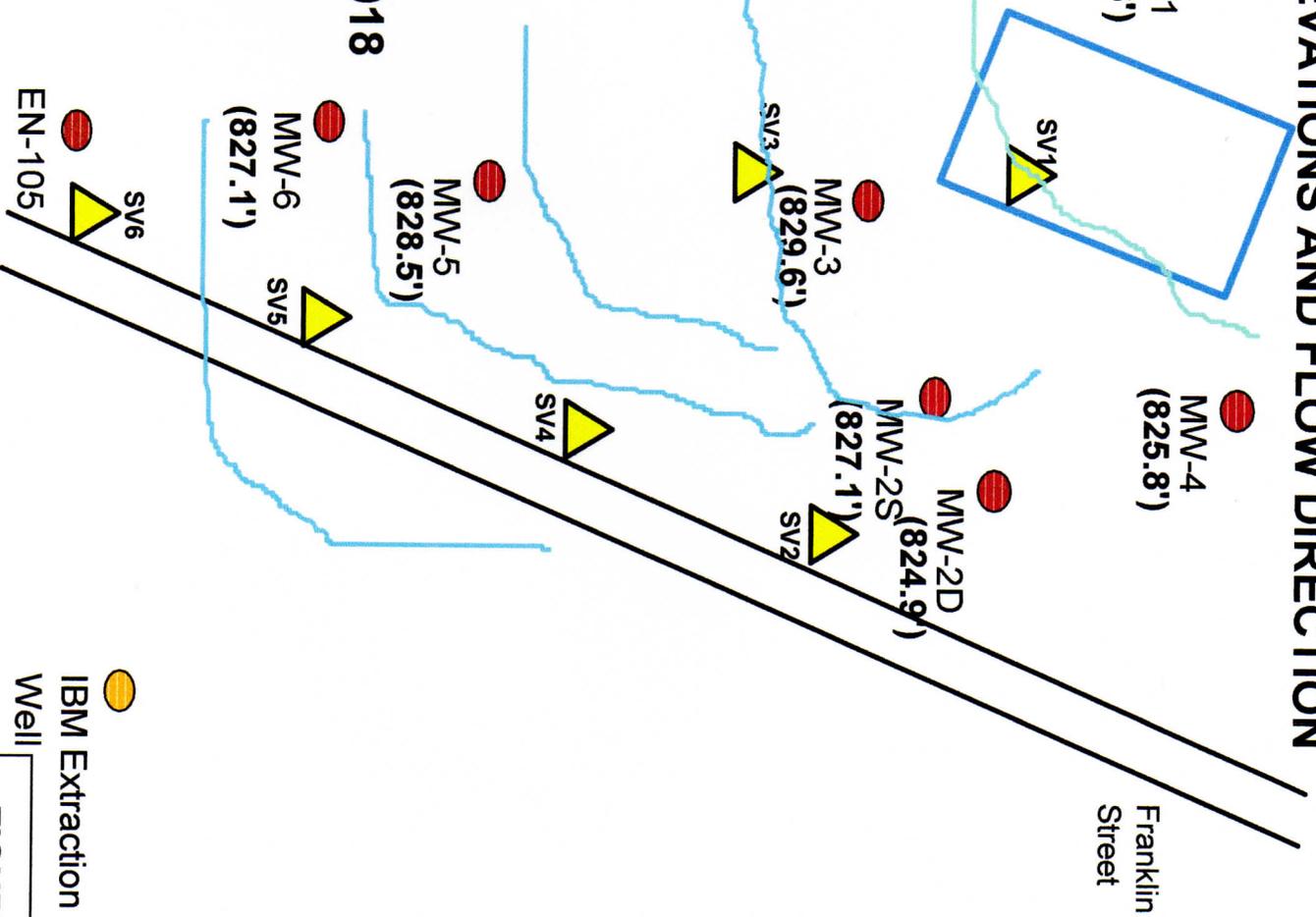


FIGURE 2

TABLES

Table 1 Monitoring Well and Soil Vapor Implant Groundwater Lab Results

Table 2 Soil Vapor Implant Air Lab Results

Table 3 Groundwater Monitoring Well Field Data

Table 4 Soil Vapor Implant Field Data

Table 5 Monitoring Well and Soil Vapor Implant Groundwater Elevation Data

Endicott-Johnson, Inc., Site #704018
 Franklin Street, Endicott, New York
 Monitoring Well and Soil Vapor Implant Groundwater Monitoring Laboratory Results

Volatile / Semivolatile*	MCL** (ug/L)	MW1 (ug/L)	MW2S (ug/L)	MW2D (ug/L)	MW3 (ug/L)	MW4 (ug/L)	MW5 (ug/L)	MW6 (ug/L)	SV1 (ug/L)	SV2 (ug/L)	SV3 (ug/L)	SV4 (ug/L)	SV5 (ug/L)	SV6 (ug/L)
1,1,1-Trichlorethane	5								19			16	6	
1,1-Dichloroethane	5								20			7	11	
1,2-Dichloroethane	5				14									
Acetone	50								30					
Benzene	5								140					
Chlorobenzene											7			
Carbon Tetrachloride									88					
Chloroform									270					
m,p-Xylene	5								22					
Methylene Chloride	5								18					
o-Xylene	5								7					
Toluene	5								1,700					

* If not listed, 8260 Volatile or 8270 Semivolatile was not detected above laboratory detection limits for any of the listed sample locations.

** As listed in ROD dated November, 1990. The standard for groundwater are from the New York State Sanitary Code Subpart 5-1, amendment, entitled "Standards Limiting Organic Contamination In Drinking Water."

Endicott-Johnson, Inc., Site #704018
 Franklin Street, Endicott, New York
 Soil Vapor Implant Vapor Monitoring Laboratory Results

Volatile / Semivolatile*	SV1 (ug/m3)	SV2 (ug/m3)	SV3 (ug/m3)	SV4 (ug/m3)	SV5 (ug/m3)	SV6 (ug/m3)	AMBIENT (ug/m3)
1,1,1-Trichloroethane	110,000.0	23,000.0	1,500.0	250.0	9,600.0	100.0	
1,1-Dichloroethane	2,300.0	650.0	32.0	15.0	360.0	5.8	
1,1-Dichloroethene	38.0	63.0	0.9		0.9		
1,2,4-Trimethylbenzene	6.6	12.0	9.4	6.9	5.3	2.1	
1,2-Dichloroethane							
1,3,5-Trimethylbenzene	3.0	4.1	4.2	2.9	3.0	1.0	
2,2,4-triethylpentane	57.0	44.0	19.0	76.0	82.0	2.2	
4-ethyltoluene	4.2	6.5	3.5	4.4	3.5	0.9	
Acetone	570.0	270.0	450.0	820.0	1,300.0	94.0	16.0
Benzene	29.0	9.1	3.5	2.2	2.4	0.7	0.3
Carbon disulfide	220.0	3.9	2.9	3.4	15.0	1.0	
Carbon Tetrachloride	3.4		4.5				
Chloroethane	4.3	0.3	2.8				
Chloroform	6.6	7.0	6.5	1.2	8.5		
Chloromethane	0.3	1.6	0.3	0.3	0.3	0.6	0.7
cis-1,2-Dichloroethene	4.0	130.0	1.9	0.5	4.8		
Cyclohexane	140.0	9.1	5.3	4.1	5.8		
Ethylbenzene	5.6	7.0	2.3	5.3	4.3	1.0	
Freon 11	1.4	4.0	2.1	1.3	4.2	0.9	1.4
Freon 113		3,000.0	6.0	48.0	590.0		
Freon 12	1.8	1.6	1.0	2.0	1.9	1.8	2.7
Heptane	260.0	12.0	7.8	8.3	13.0	2.0	0.8
Hexane	1,300.0	22.0	13.0	2.1	5.8	4.4	

Endicott-Johnson, Inc., Site #704018
 Franklin Street, Endicott, New York
 Soil Vapor Implant Vapor Monitoring Laboratory Results

Volatile / Semivolatile*	SV1 (ug/m3)	SV2 (ug/m3)	SV3 (ug/m3)	SV4 (ug/m3)	SV5 (ug/m3)	SV6 (ug/m3)	AMBIENT (ug/m3)
Isopropyl Alcohol				15.0	22.0		
m,p-Xylene	14.0	23.0	5.6	13.0	10.0	3.2	0.5
Methyl Ethyl Ketone			9.9	17.0	37.0		
Methyl Isobutyl Ketone		5.4	2.8	8.7	14.0		
Methylene Chloride	2.4		0.4	1.6		0.5	
o-Xylene	4.2	6.6	2.3	4.0	3.0	1.1	
Styrene	2.1	3.5	2.8	3.6	3.7		
Tetrachloroethylene	0.9	13.0	6.7	2.1	12.0		
Toluene	240.0	25.0	15.0	23.0	16.0	5.9	0.7
trans-1,2-Dichloroethene		0.6	0.6		0.8		
Trichloroethene	45.0	190.0	86.0	16.0	24.0	0.4	
Vinyl Chloride	2.2						

* If not listed, TO15 Volatile or Semivolatile was not detected above laboratory detection limits for any of the listed soil vapor implant locations.

Endicott-Johnson, Inc., Site #704018
Franklin Street, Endicott, New York
Groundwater Monitoring Well Field Data

Monitoring Well #	MW1	MW2S	MW2D	MW3	MW4	MW5	MW6
Surface Elevation	844.6	835.9	835.8	836.6	836.0	835.2	834.6
Top of Well Casing Elevation	846.5	835.7	835.9	836.4	835.9	836.8	836.7
Hang Depth to Groundwater	5.9	8.7	10.9	6.8	10.1	8.3	9.6
Groundwater Elevation	840.6	827.1	825.0	829.6	825.8	828.5	827.1

Endicott-Johnson, Inc., Site #704018
Franklin Street, Endicott, New York
Soil Vapor Implant Field Data

Soil Vapor Implant #	SV1	SV2	SV3	SV4	SV5
Surface Elevation	836.3	836.3	835.6	836.8	837.0
Depth to Groundwater	5.6	10.2	5.3	11.0	9.4
Groundwater Elevation	830.7	826.1	830.3	825.8	827.6
Depth to bottom of Soil Vapor Implant	4.5	9.5	4.3	10.0	8.2
Implant Inlet Depth from Groundwater during Soil Vapor Sample Collection	1.1	0.7	1.0	1.0	1.2
Soil Vapor Implant Tubing Inlet Elevation	831.8	826.8	831.3	826.8	828.8

**Endicott-Johnson, Inc., Site #704018
Franklin Street, Endicott, New York
Soil Vapor Implant Field Data**

SV6
836.3

6.1

830.2

5.0

1.1

831.3

Endicot-Johnson, Inc., Site #704018
 Franklin Street, Endicott, New York
 Monitoring Well and Soil Vapor Implant Groundwater Elevation Data

Location	Ground Surface Elevation (Feet)	Top of Well Casing Elevation (Feet)	Groundwater Elevation (Feet)
EN-105*	832.2	834.6	NM
MW-1	844.6	846.5	840.6
MW-2S	835.9	835.7	827.1
MW-2D	835.8	835.9	824.9
MW-3	836.6	836.4	829.6
MW-4	836.0	835.9	825.8
MW-5	835.2	836.8	828.5
MW-6	834.6	836.7	827.1
SV-1	836.3	NA	830.7
SV-2	836.3	NA	826.1
SV-3	835.6	NA	830.3
SV-4	836.8	NA	825.8
SV-5	837.0	NA	827.5
SV-6	836.3	NA	829.8

*Benchmark elevation = 832.2' at well EN-105

Site Management Plan
Endicott-Johnson Site, 901 Franklin Street, Endicott, NY
NYSDEC Site ID 704018

Appendix E

**Additional Soil Vapor Sampling
Environmental Report
Endicott-Johnson, Inc., Site #704018**

FRANKLIN STREET
ENDICOTT, NEW YORK
November 14, 2007

**Additional Soil Vapor Sampling
Environmental Report**

Endicott-Johnson, Inc., Site #704018

**FRANKLIN STREET
ENDICOTT, NEW YORK**

November 14, 2007

**JOHNSON HEALTH AND SAFETY, LLC
4180 IRONWOOD DRIVE
GREENBRIER, TN 37073**

**www.johnsonhealthandsafety.com
(615) 943-6199**

1.0 INTRODUCTION

After New York State Departments of Health and Environmental Conservation review of the Environmental Investigation Report dated January 8, 2007, it was requested that additional soil vapor samples be collected at or around the site.

To ensure that residual volatile organic compounds (“VOCs”) from the former source area at the site, generally the location of previous soil vapor implant SV-1 or the highlighted fenced area on **Figures 1-3**, are not migrating in the vapor phase toward potential receptors north of the site, two (2) soil vapor samples were collected between the source area and the nearest potential receptors. The nearest potential receptors are three residential properties located north of the site as shown on attached aerial photographs depicted as **Figure 1 and Figure 2**.

The terrain and accessibility with the drill rig allowed the soil vapor samples to be collected at the two locations highlighted on **Figure 1 and Figure 2** (shown as **SV-7 and SV-8**). The two (2)-soil vapor samples were collected in accordance with the Environmental Work Plan dated August 9, 2006, as amended by the NYDEC’s approval letter dated September 6, 2006. Bedrock was encountered before reaching groundwater and the soil vapor samples were obtained approximately one (1) foot from bedrock depth (see **Table 2**). Geologic NY, Inc. and Gary Dyer Inc. are the local contractors that were used to perform the fieldwork at the site. Javier Perez, Environmental Engineer with NYDEC Division of Environmental Remediation, was present during the soil vapor implant installation and sampling events.

After State review and approval of the proposed “Additional Soil Vapor Sampling Work Plan” dated July 31, 2007 (“Work Plan”), the Work was scheduled and completed on October 15, 2007. The soil vapor samples were relinquished to Centek Laboratories, Inc. for analysis.

2.0 EXECUTIVE SUMMARY

Additional soil vapor monitoring at the Endicott-Johnson (EJ) property in Endicott, New York (NYSDEC Site #704018) was completed to support EJ's request to delist the site from the NYSDEC's registry of inactive hazardous waste sites and to investigate the potential for volatile organic compounds ("VOCs") from the former source area at the site to migrate in the vapor phase toward potential receptors north of the site.

Although EJ completed all of the required activities under the ROD, as amended, EJ agreed to perform this additional sampling without waiving any defenses that EJ may have regarding the NYSDEC's authority to compel EJ to perform this additional work.

The site fieldwork and sampling was completed on October 15, 2007. David Johnson of Johnson Health and Safety, LLC and Javier Perez of NYSDEC supervised all onsite fieldwork and sampling activities in accordance with the approved Work Plan.

Two (2) soil vapor samples (SV-7 and SV-8) were collected between the source area and the nearest potential receptors as shown on **Figures 1-3**. The sampling results are revealed in **Table 1** and in **Appendix 1**. The VOCs with the highest soil vapor concentrations detected at SV-7 and SV-8 were toluene, acetone and xylene. Toluene had a soil vapor concentration of 42 $\mu\text{g}/\text{m}^3$ at SV-7 and 33 $\mu\text{g}/\text{m}^3$ at SV-8. Acetone had a soil vapor concentration of 33 $\mu\text{g}/\text{m}^3$ at SV-7 and 24 $\mu\text{g}/\text{m}^3$ at SV-8. Xylene had a soil vapor concentration of 33 $\mu\text{g}/\text{m}^3$ at SV-7 and 9.8 $\mu\text{g}/\text{m}^3$ at SV-8. All other VOCs analyzed were either undetected or less than 10 $\mu\text{g}/\text{m}^3$.

The soil vapor concentration levels detected at SV-7 and SV-8 are low and beneath the initial classification for sub-slab concentrations in NYDOH's Soil Vapor / Indoor Air Matrixes (**Appendix 3 – Matrix 1 <50 $\mu\text{g}/\text{m}^3$; Matrix 2 < 100 $\mu\text{g}/\text{m}^3$**), which are not expected to significantly affect indoor air quality. With regard to EPA's Subsurface Vapor Intrusion Guidance, the detected levels are significantly below the "target shallow gas concentration corresponding to target indoor air concentration" published in Table 2b (**Appendix 1**). This respective EPA level for toluene is 4,000 $\mu\text{g}/\text{m}^3$; for acetone is 3,500 $\mu\text{g}/\text{m}^3$; and for xylene is 70,000 $\mu\text{g}/\text{m}^3$.

From the soil vapor implant results at SV-7 and SV-8, there is no indication that the VOCs of concern have migrated significantly from the localized area comprising the system fence in the vapor phase toward potential receptors north of the site. With the results of the additional soil vapor sampling in comparison with NYDOH and EPA screening or target levels, Endicott-Johnson, Inc. proposes to submit the following environmental easements to NYDEC for approval: 1) groundwater use on the property is prohibited; 2) sub-slab depressurization systems will be considered for any structures that may be built on the property; and 3) compliance with said environmental easements will be periodically certified. With approval, the easements will be officially filed with the property deed. Endicott-Johnson, Inc. will subsequently renew its request that the NYSDEC delist the site from the NYSDEC's registry of inactive hazardous waste sites.

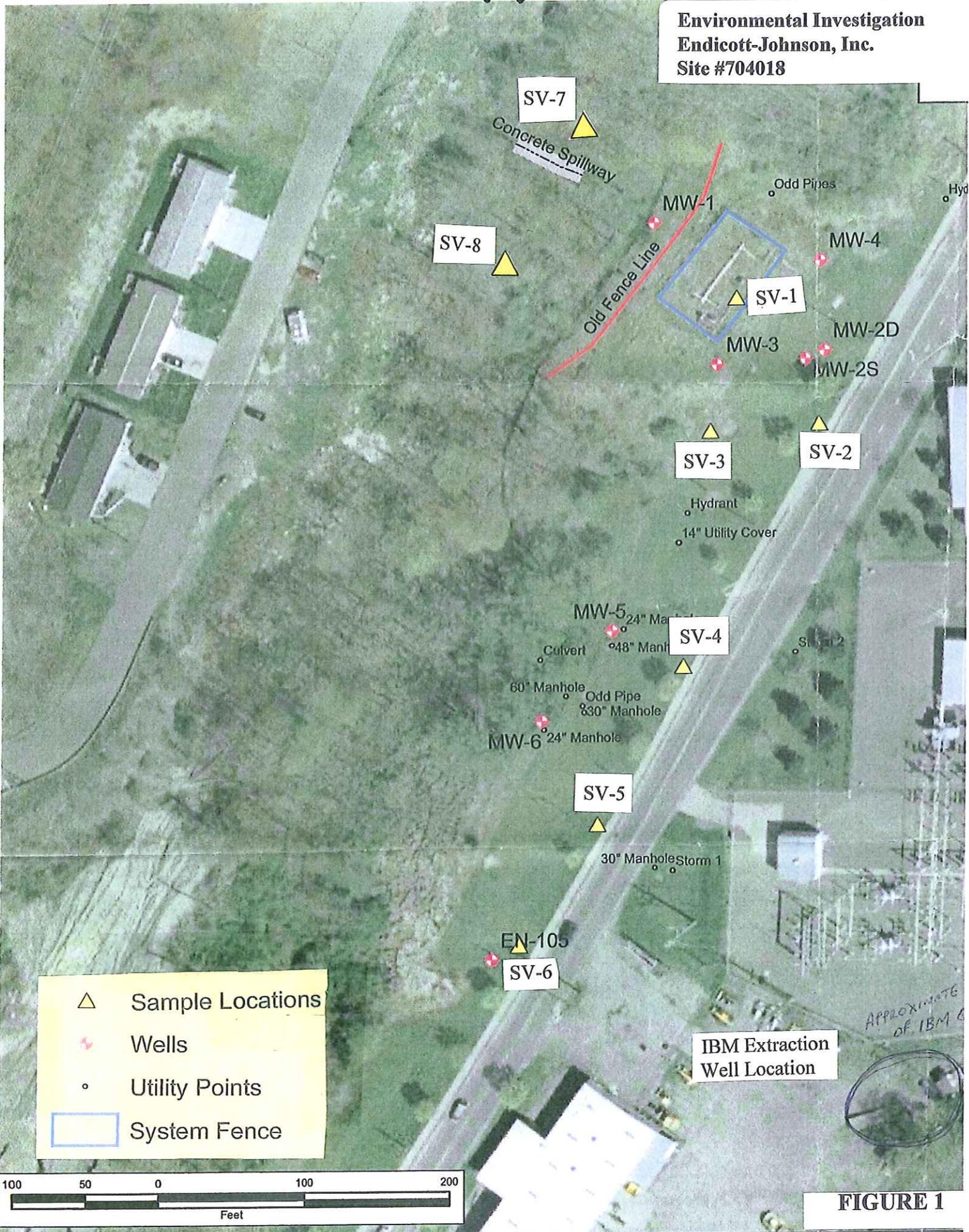
5.0 CONCLUSIONS AND RECOMMENDATIONS

The soil vapor concentration levels detected at SV-7 and SV-8 are low and beneath the initial classification for sub-slab concentrations in NYDOH's Soil Vapor / Indoor Air Matrixes (**Appendix 3 – Matrix 1 <50 ug/m³; Matrix 2 < 100 ug/m³**), which are not expected to significantly affect indoor air quality. With regard to EPA's Subsurface Vapor Intrusion Guidance, the detected levels are significantly below the "target shallow gas concentration corresponding to target indoor air concentration" published in Table 2b (**Appendix 1**). This respective EPA level for toluene is 4,000 ug/m³; for acetone is 3,500 ug/m³; and for xylene is 70,000 ug/m³.

From the soil vapor implant results at SV-7 and SV-8, there is no indication that the VOCs of concern have migrated significantly from the localized area comprising the system fence in the vapor phase toward potential receptors north of the site. With the results of the additional soil vapor sampling in comparison with NYDOH and EPA screening or target levels, Endicott-Johnson, Inc. proposes to submit the following environmental easements to NYDEC for approval: 1) groundwater use on the property is prohibited; 2) sub-slab depressurization systems will be considered for any structures that may be built on the property; and 3) compliance with said environmental easements will be periodically certified. With approval, the easements will be officially filed with the property deed. Endicott-Johnson, Inc. will subsequently request that the NYSDEC delist the site from the NYSDEC's registry of inactive hazardous waste sites.



**Environmental Investigation
Endicott-Johnson, Inc.
Site #704018**



- △ Sample Locations
- ⊕ Wells
- Utility Points
- System Fence

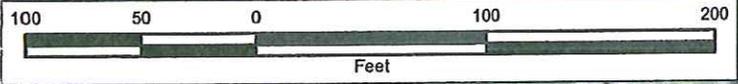


FIGURE 1

**Environmental Investigation
Endicott-Johnson, Inc.
Site #704018
PROPERTY BONDERIES**



FIGURE 2

TABLE 1
 Endicott-Johnson, Inc., Site #704018
 Franklin Street, Endicott, New York
 Soil Vapor Implant Vapor Monitoring Laboratory Results

	9-25-06 SV1 (ug/m3)	9-25-06 SV2 (ug/m3)	9-25-06 SV3 (ug/m3)	9-25-06 SV4 (ug/m3)	9-25-06 SV5 (ug/m3)	9-25-06 SV6 (ug/m3)	9-25-06 AMBIENT (ug/m3)	10-15-07 SV7 (ug/m3)	10-15-07 SV8 (ug/m3)	10-15-07 AMBIENT (ug/m3)
Volatile / Semivolatile*										
1,1,1-Trichloroethane	110,000.0	23,000.0	1,500.0	250.0	9,600.0	100.0				
1,1-Dichloroethane	2,300.0	650.0	32.0	15.0	360.0	5.8				
1,1-Dichloroethene	38.0	63.0	0.9		0.9					
1,2,4-Trimethylbenzene	6.6	12.0	9.4	6.9	5.3	2.1		9.0	2.5	
1,2-Dichloroethane										
1,3,5-Trimethylbenzene	3.0	4.1	4.2	2.9	3.0	1.0		3.6	0.9	
2,2,4-triethylpentane	57.0	44.0	19.0	76.0	82.0	2.2		4.6	1.3	
4-ethyltoluene	4.2	6.5	3.5	4.4	3.5	0.9		4.2	0.9	
Acetone	570.0	270.0	450.0	820.0	1,300.0	94.0	16.0	33.0	24.0	5.6
Benzene	29.0	9.1	3.5	2.2	2.4	0.7	0.3	8.1	2.7	
Carbon disulfide	220.0	3.9	2.9	3.4	15.0	1.0		1.1	2.0	
Carbon Tetrachloride	3.4		4.5							0.8
Chloroethane	4.3	0.3	2.8							
Chloroform	6.6	7.0	6.5	1.2	8.5					
Chloromethane	0.3	1.6	0.3	0.3	0.3	0.6	0.7			
cis-1,2-Dichloroethene	4.0	130.0	1.9	0.5	4.8					
Cyclohexane	140.0	9.1	5.3	4.1	5.8			6.8	1.5	
Ethylbenzene	5.6	7.0	2.3	5.3	4.3	1.0		9.3	2.4	
Freon 11	1.4	4.0	2.1	1.3	4.2	0.9	1.4	1.3		1.4
Freon 113		3,000.0	6.0	48.0	590.0					
Freon 12	1.8	1.6	1.0	2.0	1.9	1.8	2.7	2.3		2.6
Heptane	260.0	12.0	7.8	8.3	13.0	2.0	0.8	9.2	2.0	
Hexane	1,300.0	22.0	13.0	2.1	5.8	4.4		17.0	3.4	1.0
Isopropyl Alcohol				15.0	22.0					
m,p-Xylene	14.0	23.0	5.6	13.0	10.0	3.2	0.5	33.0	9.8	
Methyl Ethyl Ketone			9.9	17.0	37.0					
Methyl Isobutyl Ketone		5.4	2.8	8.7	14.0					

TABLE 1
 Endicott-Johnson, Inc., Site #704018
 Franklin Street, Endicott, New York
 Soil Vapor Implant Vapor Monitoring Laboratory Results

Volatile / Semivolatile*	9-25-06 SV1 (ug/m3)	9-25-06 SV2 (ug/m3)	9-25-06 SV3 (ug/m3)	9-25-06 SV4 (ug/m3)	9-25-06 SV5 (ug/m3)	9-25-06 SV6 (ug/m3)	9-25-06 AMBIENT (ug/m3)	10-15-07 SV7 (ug/m3)	10-15-07 SV8 (ug/m3)	10-15-07 AMBIENT (ug/m3)
Methylene Chloride	2.4		0.4	1.6		0.5				
o-Xylene	4.2	6.6	2.3	4.0	3.0	1.1		8.8	2.4	
Styrene	2.1	3.5	2.8	3.6	3.7					
Tetrachloroethylene	0.9	13.0	6.7	2.1	12.0			1.2		
Toluene	240.0	25.0	15.0	23.0	16.0	5.9	0.7	42.0	33.0	1.2
trans-1,2-Dichloroethene		0.6	0.6		0.8					
Trichloroethene	45.0	190.0	86.0	16.0	24.0	0.4				
Vinyl Chloride	2.2									

* If not listed, TO15 Volatile or Semivolatile was not detected above laboratory detection limits for any of the listed soil vapor implant locations.