

Cherokee Columbus Real Estate, LLC

2007 Land Farming Work Plan

**Former Borden Resins Facility
Bainbridge, New York**

February 2007

ERM Project Number 0059051

Prepared by:

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ABBREVIATIONS AND ACRONYMS

Cherokee	Cherokee Columbus Real Estate, LLC
COC	Chain of Custody
ERM	Environmental Resources Management
EWMI	Environmental Waste Minimization, Inc.
HASP	Health and Safety Plan
LFWP	Land Farming Work Plan
NYSDEC	New York State Department of Environmental Conservation
PRA	Phenol Recovery Area
RCRA	Resource Conservation and Recovery Act
SEP	Soil Excavation Plan
TRP	Total Recoverable Phenols

1.0

INTRODUCTION

This 2007 Land Farming Work Plan (LFWP) has been prepared by Environmental Resources Management (ERM) on behalf of Cherokee Columbus Real Estate, LLC (Cherokee) to describe land farming procedures at the Former Borden's Facility located in Bainbridge, New York (the Site). The Site Location Map is shown on Figures 1 of Appendix A.

Based on discussions over the spring and summer of 2006 with Mr. Doug Mosteller of Cherokee and Mr. Larry Thomas of the New York Department of Environmental Conservation (NYSDEC), ERM understands the NYSDEC has approved the Soil Excavation Plan (SEP), revised 7 November 2005 (prepared by the previous consultant, (MACTEC)). The Work Plan included the land farming of the stockpiled soil presently staged in the Phenol Recovery Area (PRA). In addition, on Friday, 27 October 2006, Mr. Mosteller and ERM had an additional conversation with Mr. Thomas in which Mr. Thomas agreed to allow the land farming to be performed at the present stockpiled location and initiation could wait until April of 2007.

The NYSDEC has identified this site as a Resource Conservation and Recovery Act (RCRA) site being regulated under the State Superfund program. This LFWP is being prepared based on the NYSDEC comments concerning the proposed scope of work for the land farming operation during a 7 January 2007 conference call and previously agreed upon NYSDEC procedures for this Site identified above.

In preparation of this LFWP, ERM reviewed the 7 November 2005 MACTEC Revised Work Plans for the Borden Facility submitted to Mr. Larry Thomas of the NYSDEC. In addition, ERM also reviewed 11 January 2001 and 2 April 2001 NYSDEC correspondence to MACTEC and Cherokee regarding biological treatment for ex-situ treatment of phenol affected soil.

1.2

WORK PLAN OBJECTIVE

As stated above, the objective of this LFWP is to present the procedures and protocols to be followed during the 2007 land farming operations at the Former Borden's Facility in Bainbridge, New York.

2.0 2007 LAND FARMING PLAN

2.1 PROJECT SCOPE

ERM and their subcontractor, Environmental Waste Minimization, Inc. (EWMI) of Northampton, Pennsylvania will mobilize to the Site around the first week in April 2007. A Site layout map showing the location of the land farming operations (within the PRA) is presented on Figure 2 in Appendix A. Work to be performed will include the following.

- Prior to the commencement of Site work, a site decontamination pad will be constructed at an appropriate location adjacent to the PRA.
- The existing polyethylene cover will be removed from the PRA stockpiled soil.
- The existing PRA stockpiled soil will be graded and leveled such that all leachate and runoff will be directed back to the aeration ponds east of the stockpiled soil.
- Approximately one-ton of 10-percent nitrogen, 10-percent phosphorous, 10-percent potassium fertilizer will be spread out over the entire stockpiled PRA soils and a bulldozer equipped with dedicated farm disc equipment will be used to mix the materials to a depth of approximately 18-inches.
- Additional mixing/disking of the upper 12 to 18-inches will be performed once every two-weeks for the next two months.
- After the initial two months of soil mixing, ERM will obtain representative samples based upon one sample per 100 cubic yards and analyze for Total Phenols.
- Upon receipt of the laboratory results, determination will be made if the material will be placed back in the aeration ponds as backfill material, placed at another Site location or remain within the land farm cell for additional land farming as required. Please note at this time ERM and Cherokee are not presenting any soil cleanup level. Upon completion of the February 2007 quarterly groundwater sampling event, results of the sampling and any other pertinent Site information will be summarized and ERM will submit a technical presentation on the recommended soil cleanup value within that document. Details of the February 2007 sampling event have been presented in a separate

work Plan, 2007 Quarterly Groundwater Sampling presented to the NYSDEC prior to this document in February 2007.

- If sample results indicate that the Total Phenols are below the recommended NYSDEC Soil Cleanup Standard (as presented in the results of the February 2007 quarterly sampling report), the top one foot of material will be removed from the stockpile and placed in one of the aeration ponds as backfill material or at another Site location. The process described above will then be repeated until early November 2007.
- ERM will present updates on the status of the land farming operations in the quarterly groundwater reports throughout the land farming operations in 2007.
- The cell material soils will be mixed weekly through the first week of December 2007, at which time the stockpiled PRA soils will be covered with two layers of 6-mil polyethylene for the winter season and allowed to “cure”. ERM will then prepare a status report documenting the previous eight months of land farming operations with details on the remaining scope of work.

Also during the initial site visit in April 2007, the bagged carbon presently on-site and the carbon in the vessels within the remediation building and in the two 55-gallon staged drums will be loaded and transported to Hyland Acres in Angelica, New York as non-hazardous waste with the appropriate manifest documentation.

3.0 WASTE MANAGEMENT

Management practices for wastes generated during implementation of 2007 land farming operation at the Site will be focused on the primary goal of minimizing the volume of waste that requires off-site management and disposal. ERM anticipates that only non-hazardous wastes will be generated during implementation of the remedial action at the Site. Management of wastes will be performed in compliance with applicable federal, state, and local laws and regulations.

3.1 ON-SITE WASTE MANAGEMENT

ERM proposes to manage certain types of non-hazardous wastes on Site. PPE, disposable sampling equipment, plastic sheeting, or other similar wastes associated with non-hazardous solid or liquid wastes will be placed into heavy-duty plastic bags. These bags will subsequently be placed into the Facility's normal solid waste dumpsters for eventual transport and disposal off Site at a permitted solid waste (Subtitle D) disposal facility.

3.2 OFF-SITE WASTE MANAGEMENT

ERM proposes to manage all non-hazardous wastes requiring proper transport and disposal at off-Site locations (such as the previously discussed carbon material) in conformance with applicable federal, state, and local regulations. PPE, disposable sampling equipment, and plastic sheeting associated with non-hazardous solid or liquid wastes will be placed into heavy-duty plastic bags. These bags will subsequently be placed with non-hazardous materials for subsequent transport and disposal off-Site at a permitted solid waste (Subtitle D) disposal facility.

4.0

HEALTH AND SAFETY

ERM has previously indicated to the NYSDEC that ERM has reviewed and accepted the previously NYSDEC approved MACTEC Site-specific Health and Safety Plan (HASP). The Site-specific HASP will be used for work performed in conjunction with all remedial activities proposed in this LFWP. Anyone requesting access to the work areas will be required to review the site specific HASP and execute an acknowledgement that they understand the contents and procedures outlined in the HASP.

5.0

PROJECT ORGANIZATION AND SCHEDULE

Based on information available at the time of preparation of this LFWP, the following table provides contact information for key personnel that will be involved with the implementation of the land farming operations at the Site.

Individual	Company	Role	Phone Number(s)
Mr. Ed Hinchey, P.G.	ERM	Principal-in-Charge	315-445-2554 (office) 315-256-5355 (cell)
Mr. David W. Myers	ERM	Project Manager	518-356-5749 (office) 518-461-8936 (cell)
Mr. Todd Marsh	ERM	Project Geologist	315-445-2554 (office) 315-506-0202 (cell)
Mr. Mike Nigro.	ERM	Field Team Leader	315-445-2554 (office) 315-546-5341 (cell)

The following paragraph presents a proposed project schedule for implementation of the groundwater sampling at the Site. The proposed schedule is tentative based on regulatory review approval times, Site access, and outside scheduling considerations for subcontractors and suppliers.

Proposed Schedule

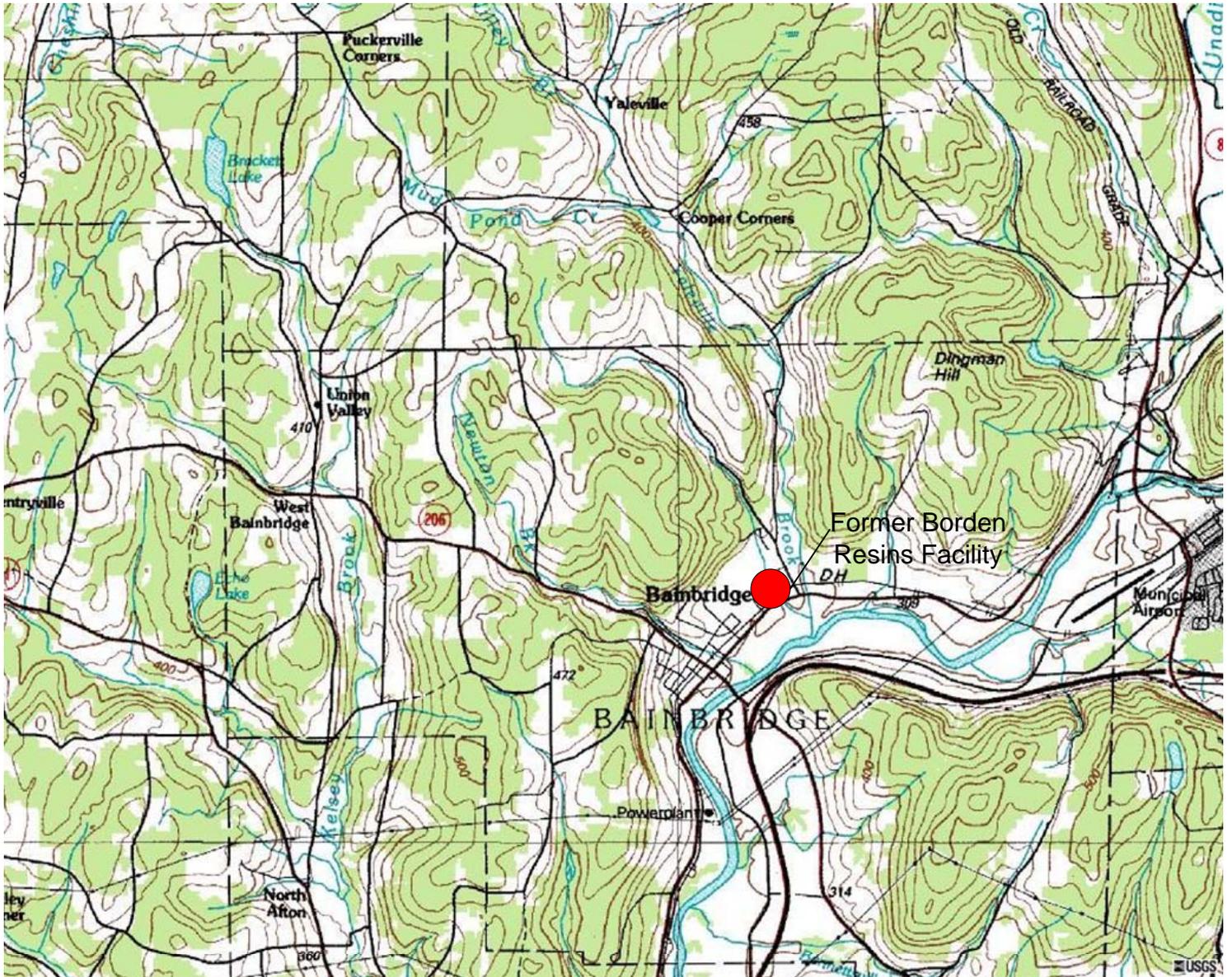
- March 2007: Submit February Quarterly Groundwater Report to NYSDEC.
- April 2, 2007: Initiate Land Farming Operations and off-site disposal of staged carbon materials.
- June 2007: Submit May Quarterly Groundwater Report to NYSDEC with update on land farming operations.
- September 2007: Submit August Quarterly Groundwater Report to NYSDEC with update on land farming operations.

December 2007:

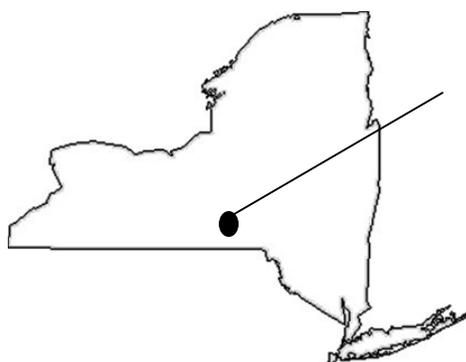
Submit November Quarterly
Groundwater Report to NYSDEC with
status of land farming operations.

Appendix A

Figures



Source:
www.TerraServer.com



Bainbridge, New York

Former Borden Resins Facility
Bainbridge, New York

 ERM	Scale 1:2000	Figure 1
	Date 1/07	



APPROXIMATE PHENOL RECOVERY AREA

MW-28

Existing Ponds

Treatment Shed

MW-16

MW-20

OW-035

POE

MW-30

MW-15

MW-35

MW-27

CANADIAN PACIFIC RAILROAD

Beatty Creek

LEGEND

MW-12 MONITORING WELL LOCATION

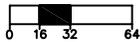
PHENOL RECOVERY AREA

Creek Flow Direction

CHAIN LINK FENCE

CREEK SAMPLE LOCATION

SCALE (IN FEET)



Notes: - Existing Ponds and Beatty Creek are not to scale.

- Base map obtained from MACTEC Environmental Consultants, Inc. Detailed Site Map dated 28 April 2005.

SITE LAYOUT MAP
FORMER BORDEN RESINS FACILITY
BAINBRIDGE, NEW YORK

PREPARED FOR



SCALE
1"=64'

DATE
01/07

FIGURE

2

PROJECT #40000000