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February 6, 2006

Mr. Ed Hampston
NYS Department of Environmental Conservation
Division of Environmental Remediation
625 Broadway, 12th Floor
Albany, New York 12233-7013

Subject: **DRAFT - Soil Sampling Report**
Luster-Coate Metallizing Corporation
32 East Buffalo Street
Village of Churchville, Monroe County, New York
NYSDEC Site No. 828113

Dear Mr. Hampston:

Empire Geo-Services, Inc. (Empire) has prepared this draft report presenting the results of soil sampling conducted at the above-referenced site. The soil sampling was conducted in accordance with the Proposed Work Plan for Sampling of Soils and Proposed Work Plan for Removal of PCB-Contaminated Soils, which was approved by the New York State Department for Environmental Conservation (NYSDEC) in a letter dated November 9, 2005. This report also identifies areas recommended for excavation based on the soil sampling results, as well as excavated soil management procedures to be followed during the soil excavation. Figure 1 is a site layout map depicting relevant site features described in this report.

SOIL SAMPLING ACTIVITIES

Soil sampling activities were conducted on November 21 and 22, 2005, and January 3, 2006. The sampling locations are depicted on Figure 2. Surface soil samples were collected from depths up to 6-inches below ground surface (bgs). These samples were collected using shovels or hand augers. Subsurface soil samples were collected from depths ranging between 6 inches and 8 feet bgs. These samples were collected using direct push sampling methods.

In accordance with the work plan, all soil samples were field screened using a photoionization detector (PID) equipped with a 10.7 eV lamp during the sampling process. The PID will detect, if present, the aggregate concentration of many volatile organic compounds (which have been previously detected at the site) at a threshold of 1 to 2 parts per million (ppm). All PID reading collected during the investigation were 0 parts per million, indicating that no significant VOC impacts were present at the locations sampled during the investigation.

For the collection of the surface samples, the sampling tools (i.e. hand augers, shovels, etc.) were decontaminated between each sampling location using an Alconox wash and potable water rinse. For direct push sampling, the sampling tools (i.e. samplers and rods) were decontaminated between sample location and sample interval using an Alconox wash and potable water rinse. New sample tube liners were utilized for the collection of each soil sample.

After collection, the samples were transported by courier to Upstate Laboratories, Inc. in Syracuse, New York for analysis of polychlorinated biphenyl (PCB) concentration by EPA Method SW8082. A total of 51 non-duplicate samples were analyzed from a total of 45 sampling locations. One duplicate sample was analyzed for laboratory quality control. The sampling results are discussed in the following section.

SOIL SAMPLING RESULTS

Attachment A contains the Sample Data Summary Package prepared by Upstate. This package includes all the laboratory analytical reports, as well as a case narrative, summary of quality control results, and chain-of-custody documentation.

The PCB concentrations are summarized in Table 1. Table 1 includes a total PCB concentration that is the sum of the concentrations of the individual aroclors. If an aroclor concentration was reported as non-detect, it was assigned a value of zero in the total PCB calculation. Figure 2 is a map depicting the sampling locations and total PCB concentrations.

A total of three different aroclors were detected in the samples. Aroclor 1248 was the most prevalent, with detectable concentrations occurring in 41 of the 51 samples analyzed. Aroclor 1254 was detected in one sample at a concentration of 0.048 milligrams per kilogram (mg/kg). Aroclor 1260 was detected in one sample was detected in one sample at a concentration of 5.8 mg/kg.

The NYSDEC recommended soil cleanup objective (RSCO) for total PCBs in surface soils is 1 mg/kg. The 1 mg/kg RSCO was exceeded at 23 of the 45 sampling locations. These concentrations ranged from 1 to 145.8 mg/kg. As shown on Figure 2, these locations are generally concentrated along the site driveway and on the northwest side of the main site building, between the building and the creek. No total PCB concentrations exceeded 1 mg/kg in soil greater than two feet below ground surface.

PROPOSED SOIL EXCAVATION PLAN

Figure 3 is comprehensive summary map of total PCB concentrations at the site based on PCB concentration data collected and previously reported to NYSDEC by Shaw Environmental, Inc. (Shaw) in October 2004 and April 2005, and total PCB concentration data collected by Empire and summarized in the previous section.

Based on this comprehensive summary map, Empire has prepared a proposed excavation map, which is included as Figure 4. The proposed excavation areas include all locations with total PCB concentrations exceeding the NYSDEC RSCO of 1 mg/kg. Nine excavation areas have been identified. These areas, including the sampling locations within the excavation areas, are summarized on Table 2.

The horizontal extent of the proposed excavation areas is based on sampling locations with PCB concentrations less than 1 mg/kg. In areas not well delineated by such sampling locations (such as east of SS-101 and SS-102 or northeast of SS-130 and SS-138), the extent of excavation required is not known. One discrete confirmation sample will be collected from the top of each sidewall for every 30 linear feet of sidewall.

Based on the sample results from the deeper soil borings, Empire proposes excavating impacted areas to a uniform depth of one foot bgs. The single exception to this is in the vicinity of SS-116, where a PCB concentration of 39 mg/kg was measured in a sample collected from 0 to 2 feet bgs. One discrete confirmation sample will be collected from the approximate center of every approximately 900 square feet of bottom area.

All confirmation samples will be shipped to Upstate and analyzed for PCBs by EPA Method 8082. Twenty-four hour turnaround time will be requested on the sample analysis, allowing the sample results to be used to direct further excavation. In the event that a sample has a PCB concentration exceeding 1 mg/kg, additional excavation will be performed and further sidewall and floor sampling will be conducted as appropriate.

Based on the estimated horizontal extent and depth of excavation, a minimum of approximately 1,109 tons of PCB contaminated soil will be excavated from the nine areas. The approximate tonnage to be excavated from each excavation area is summarized in Table 2. A backhoe and hand-shoveling will be utilized to perform the PCB-contaminated soil removal. At locations where it is feasible, excavated soil will be loaded directly into dump trucks for off-site disposal an approved waste management facility. If direct loading is not possible, the soil will be stockpiled near the excavation area. Any stockpiles of PCB-contaminated soil will be placed on polyethylene sheeting. At the end of each working day, any stockpiles will be covered with polyethylene sheeting.

Excavated soil with a total PCB concentration less than 50 mg/kg will be disposed of at a municipal landfill or equivalent. Soil with a total PCB concentration equal to or greater than 50 mg/kg will be disposed off at a Toxic Substances Control Act (TSCA) chemical waste landfill. Areas to be excavated as TSCA or non-TSCA waste are indicated on Figure 4. Based on the proposed excavation, approximately 996 tons of soil is expected to be disposed of as non-TSCA and 113 tons as TSCA waste. Determination of TSCA versus non-TSCA waste will be based on the soil sampling conducted to date and the concentrations shown on Figure 4. No additional sampling of the excavated soil for characterization as TSCA or non-TSCA waste is planned.

The New York State Department of Health Generic Community Air Monitoring Plan will be followed during excavation activities. During the excavation activities, Empire will monitor for organic vapor concentrations at the downwind site perimeter utilizing a PID meter. If elevated PID readings are detected at any time, excavation activities will be stopped until the measured organic vapors diminish to background values. Real-time particulate monitoring will also be conducted. Excavation will also be suspended if elevated particulate concentrations or visible dust is observed at the downwind site perimeter. If elevated particulate concentrations are routinely measured or observed, a water spray will be utilized to wet the excavation area and reduce the potential for airborne particulate matter. Based on the site contaminants and soil types, Empire is not anticipating organic vapors or dust to pose a threat to areas outside of the site boundaries.

The installation of silt fences or other appropriate practices will be employed where necessary to prevent stormwater "runon" and "runoff" into or from the excavated areas. Particular care will be taken in the area to be excavated between the west side of the main site building and Black Creek.

Following the completion of excavation activities, Empire will complete the following site restoration activities:

- Any deeper excavated areas (greater than one foot) will be filled with clean backfill material to a depth of about six inches below ground surface. This material may consist of crushed stone, sand and gravel, or silt and clay, as appropriate. Preliminary plans are to obtain backfill material from Elam Sand and Gravel. Sampling of the backfill material to ensure it does not contain contaminants will be conducted at the direction of NYSDEC.
- Topsoil will be used as cover material over backfill material within the excavated lawn and garden areas. Preliminary plans are to obtain backfill material from Elam Sand and Gravel. The backfill can be sampled to ensure it does not contain contaminants at the direction of NYSDEC. Grass seed will be placed on these areas, and any garden plants removed as part of the excavation activities will also be replaced.
- Pavement which may have been removed will be replaced.
- Fence structures which may have been removed will be replaced.
- Garden plants will be replaced.

The excavation plan calls for all soil with PCB concentrations greater than 1 mg/kg to be removed from the site. Therefore, no institutional controls or operation, maintenance, and monitoring plan are anticipated to be required for PCB-impacted soil at the site. In the event that all the soil with PCB concentrations greater than 1 mg/kg cannot be removed due to the presence of utilities, structures, or other reasons, a soil management plan will be prepared for the site.

Following completion of all field excavation activities, an interim report will be submitted to NYSDEC and will consist of a site sketch indicating the areas excavated. Following receipt of all disposal manifests and final laboratory analytical results, Empire will prepare a final PCB-Contaminated Soil Removal Summary report.

Empire can proceed with this excavation plan within two weeks of receiving a work authorization from NYSDEC. From that point, the following schedule is proposed:

Week 1- Identify and contract waste haulers and disposal facilities for both TSCA and non-TSCA waste

Week 2- Mobilize equipment to the site and conduct the soil excavation and confirmation sampling

Week 3- Conduct site restoration activities

Week 4- Begin preparation of the remedial report, including final inspection by NYSDEC

Week 5- Finalize remedial report and submit to NSYDEC

We hope this information meets your needs. If you have any questions, please call us at (585) 359-2730.

Sincerely,

Greg Young
Geologist

Charles Guzzetta
Project Manager

Figures

1 Site Plan
2 PCB Concentration Map (Empire Data)
3 Comprehensive PCB Concentration Map
4 Proposed Excavation Areas

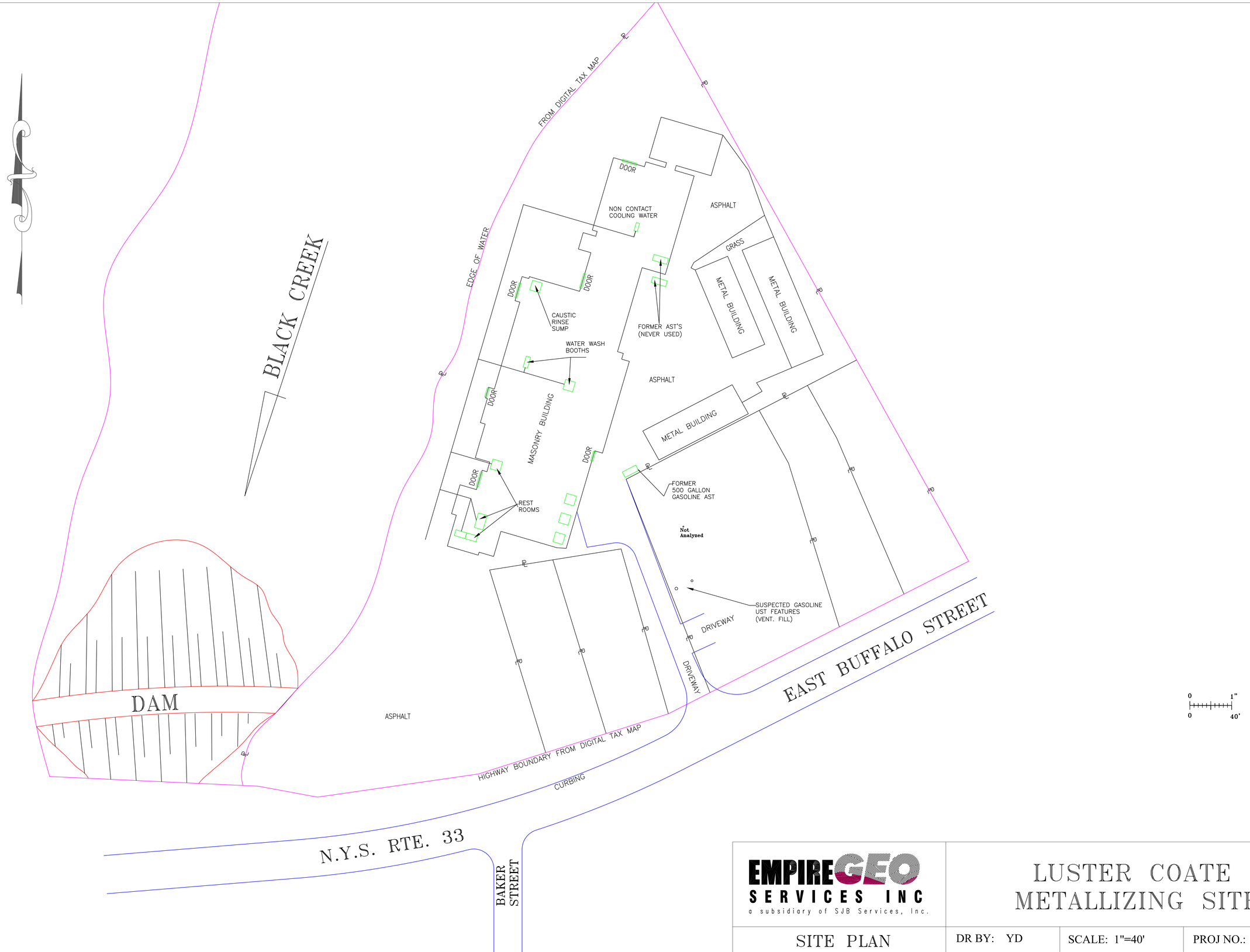
Tables

1 Summary of PCB Concentrations in Soil
2 Proposed Excavation Summary

Attachments

A Upstate Laboratory, Inc. Sample Data Summary Package

FIGURES



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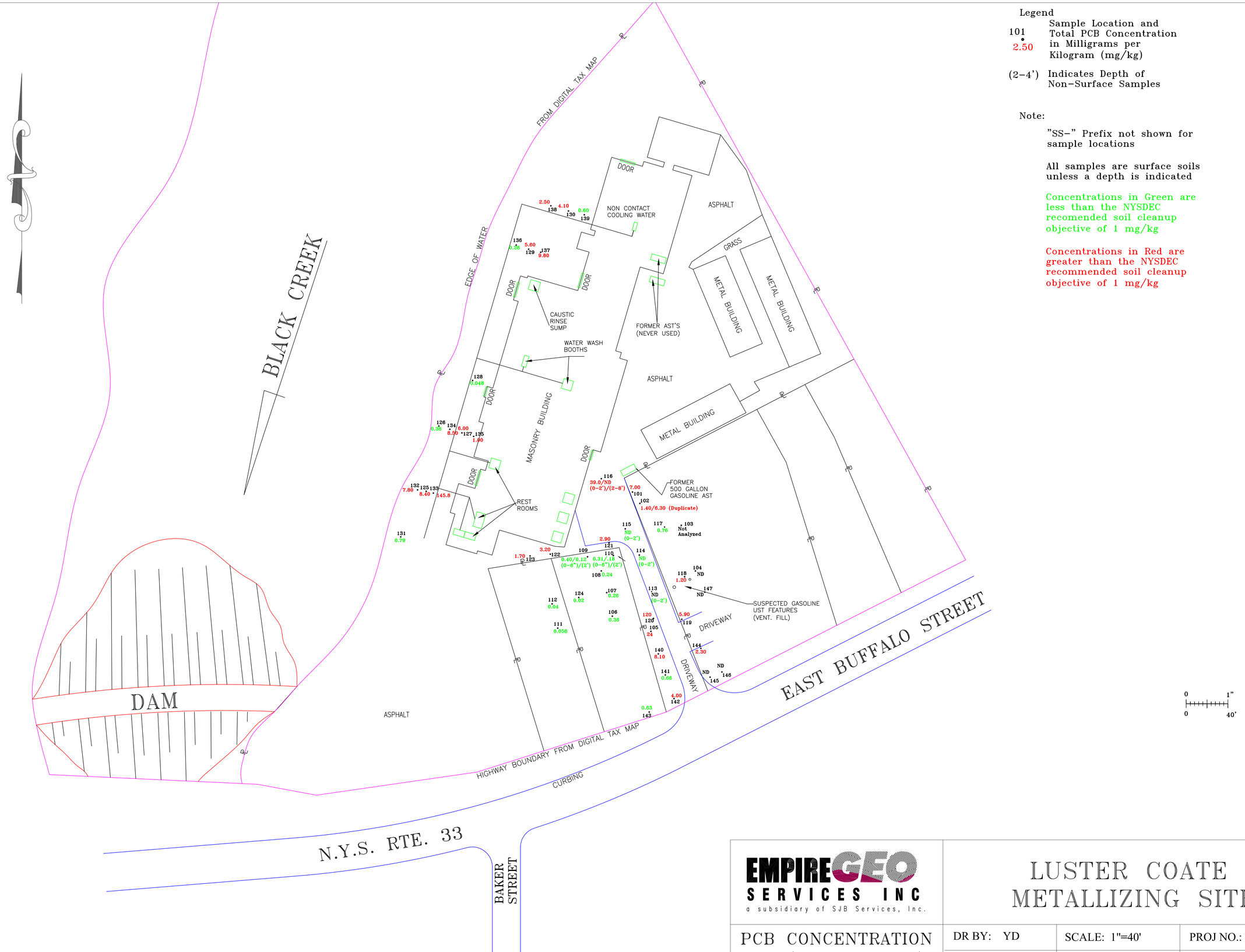
LUSTER COATE METALLIZING SITE

SITE PLAN

DR BY: YD	SCALE: 1"=40'	PROJ NO.:
CHKD BY:	DATE: 12/02/05	FIGURE NO: 1



Legend

101 • 2.50 — Sample Location and Total PCB Concentration in Milligrams per Kilogram (mg/kg)

(2-4') — Indicates Depth of Non-Surface Samples

Note:

"SS-" Prefix not shown for sample locations

All samples are surface soils unless a depth is indicated

Concentrations in Green are less than the NYSDEC recomended soil cleanup objective of 1 mg/kg

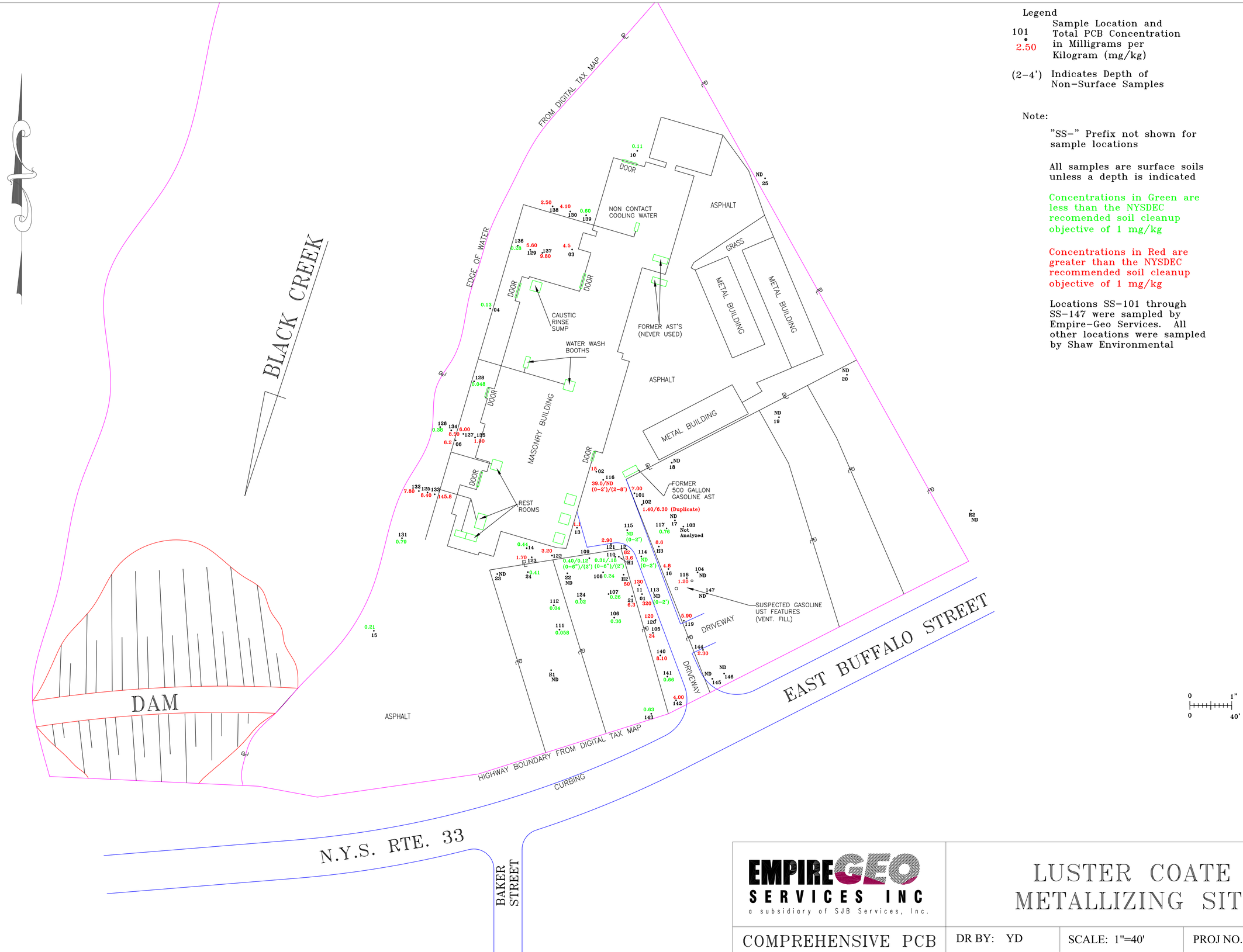
Concentrations in Red are greater than the NYSDEC recommended soil cleanup objective of 1 mg/kg

EMPIRE GEO SERVICES INC
a subsidiary of SJB Services, Inc.

LUSTER COATE METALLIZING SITE

PCB CONCENTRATION MAP (EMPIRE DATA)

DR BY: YD	SCALE: 1"=40'	PROJ NO.:
CHKD BY:	DATE: 12/02/05	FIGURE NO: 2



Legend

101 Sample Location and
2.50 Total PCB Concentration in Milligrams per Kilogram (mg/kg)

(2-4') Indicates Depth of Non-Surface Samples

Note:

"SS-" Prefix not shown for sample locations

All samples are surface soils unless a depth is indicated

Concentrations in Green are less than the NYSDEC recomended soil cleanup objective of 1 mg/kg

Concentrations in Red are greater than the NYSDEC recommended soil cleanup objective of 1 mg/kg

Locations SS-101 through SS-147 were sampled by Empire-Geo Services. All other locations were sampled by Shaw Environmental

EMPIRE GEO SERVICES INC
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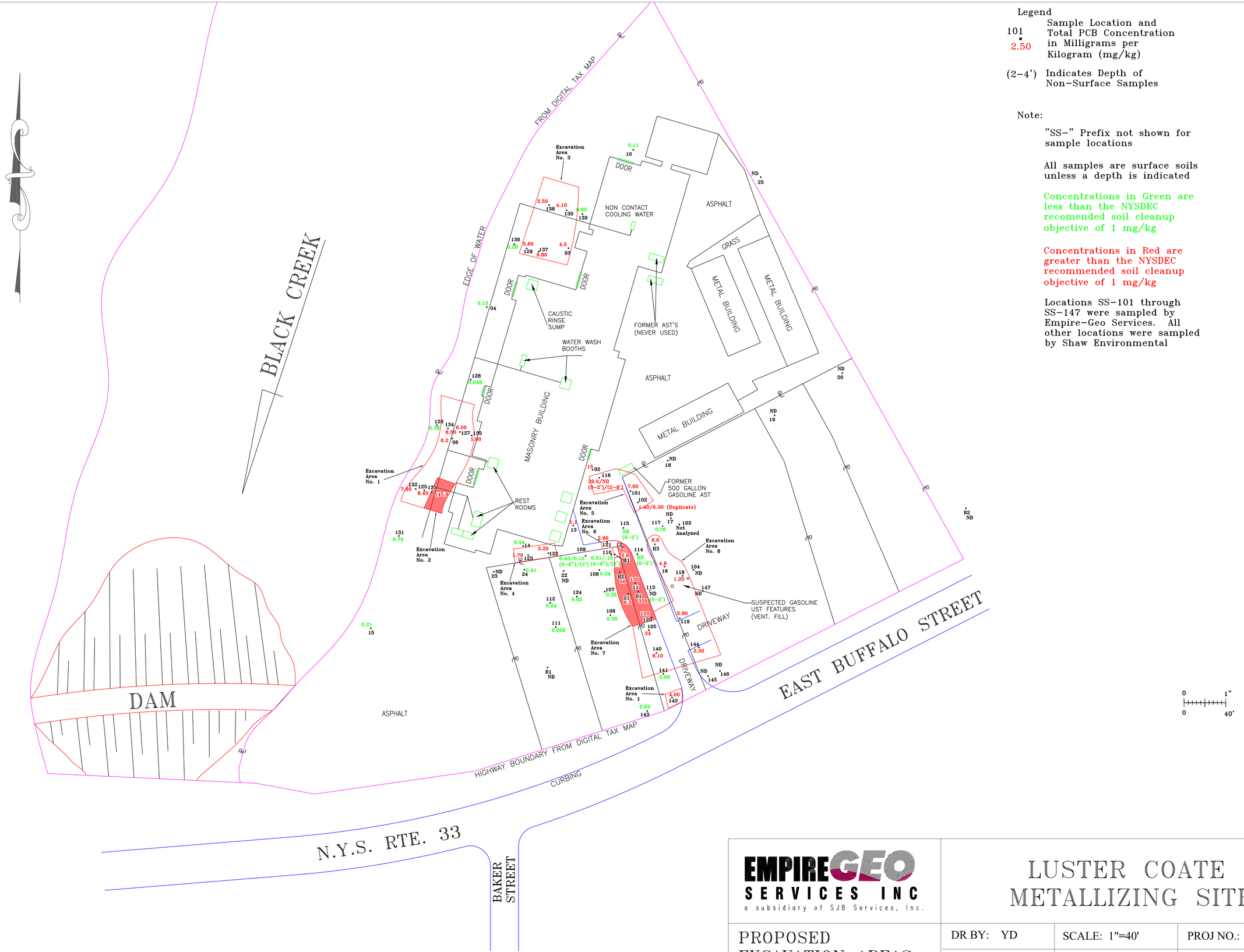
LUSTER COATE METALLIZING SITE

COMPREHENSIVE PCB CONCENTRATION MAP

DR BY: YD	SCALE: 1"=40'	PROJ NO.:
CHKD BY:	DATE: 12/02/05	FIGURE NO: 3



Legend

101 • 2.50 — Sample Location and Total PCB Concentration in Milligrams per Kilogram (mg/kg)

(2-4') — Indicates Depth of Non-Surface Samples

Note:

"SS-" Prefix not shown for sample locations

All samples are surface soils unless a depth is indicated

Concentrations in Green are less than the NYSDEC recomended soil cleanup objective of 1 mg/kg

Concentrations in Red are greater than the NYSDEC recommended soil cleanup objective of 1 mg/kg

Locations SS-101 through SS-147 were sampled by Empire-Geo Services. All other locations were sampled by Shaw Environmental

EMPIRE GEO SERVICES INC
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LUSTER COATE METALLIZING SITE

PROPOSED EXCAVATION AREAS

DR BY: YD	SCALE: 1"=40'	PROJ NO.:
CHKD BY:	DATE: 12/02/05	FIGURE NO: 4

TABLES

TABLE 1
SUMMARY OF PCB CONCENTRATIONS IN SOIL
Luster Coate Metallizing Site 828113
East Buffalo Street
Churchville, New York

Analyte	SS-101	SS-102	SS-102 DUP	SS-103	SS-104	SS-105	SS-106	SS-107	SS-108
Aroclor 1016	ND	ND	ND		ND	ND	ND	ND	ND
Aroclor 1221	ND	ND	ND		ND	ND	ND	ND	ND
Aroclor 1232	ND	ND	ND		ND	ND	ND	ND	ND
Aroclor 1242	ND	ND	ND		ND	ND	ND	ND	ND
Aroclor 1248	7.00	1.40	6.30		ND	24 J	0.36	0.26	0.24
Aroclor 1254	ND	ND	ND		ND	ND	ND	ND	ND
Aroclor 1260	ND	ND	ND		ND	ND	ND	ND	ND
Total PCBs	7.00	1.40	6.30	Not Analyzed	ND	24	0.36	0.26	0.24

Analyte	SS-109 (0-6")	SS-109 (2')	SS-110 (0-6")	SS-110 (2')	SS-111	SS-112	SB-113 (0-2')	SB-114 (0-2')	SB-115 (0-2')
Aroclor 1016	ND	ND	ND	ND	ND	ND	ND	ND	ND
Aroclor 1221	ND	ND	ND	ND	ND	ND	ND	ND	ND
Aroclor 1232	ND	ND	ND	ND	ND	ND	ND	ND	ND
Aroclor 1242	ND	ND	ND	ND	ND	ND	ND	ND	ND
Aroclor 1248	0.40 J	0.12	0.31	0.18	0.058	0.04 J	ND	ND	ND
Aroclor 1254	ND	ND	ND	ND	ND	ND	ND	ND	ND
Aroclor 1260	ND	ND	ND	ND	ND	ND	ND	ND	ND
Total PCBs	0.40	0.12	0.31	0.18	0.058	0.04	ND	ND	ND

NOTES:
1) All samples are of surface soil, unless and depth is indicated
2) All samples analyzed by SW8082
3) All concentrations are presented in milligram per kilogram (mg/kg).
4) ND denotes not detected at the reporting limit.
5) J denotes analyte detected below quantitation limits
6) Highlighting indicates the concentration exceeds the NYSDEC soil cleanup objective of 1 mg/kg

TABLE 1
SUMMARY OF PCB CONCENTRATIONS IN SOIL
Luster Coate Metallizing Site 828113
East Buffalo Street
Churchville, New York

Analyte	SB-116 (0-2')	SB-116 (2-4')	SB-116 (4-6')	SB-116 (6-8')	SS-117	SS-118	SS-119	SS-120	SS-121
Aroclor 1016	ND	ND	ND	ND	ND	ND	ND	ND	ND
Aroclor 1221	ND	ND	ND	ND	ND	ND	ND	ND	ND
Aroclor 1232	ND	ND	ND	ND	ND	ND	ND	ND	ND
Aroclor 1242	ND	ND	ND	ND	ND	ND	ND	ND	ND
Aroclor 1248	39	ND	ND	ND	0.76	1.20	5.90	120	2.90
Aroclor 1254	ND	ND	ND	ND	ND	ND	ND	ND	ND
Aroclor 1260	ND	ND	ND	ND	ND	ND	ND	ND	ND
Total PCBs	39	ND	ND	ND	0.76	1.20	5.90	120	2.90

Analyte	SS-122	SS-123	SS-124	SS-125	SS-126	SS-127	SS-128	SS-129	SS-130
Aroclor 1016	ND	ND	ND	ND	ND	ND	ND	ND	ND
Aroclor 1221	ND	ND	ND	ND	ND	ND	ND	ND	ND
Aroclor 1232	ND	ND	ND	ND	ND	ND	ND	ND	ND
Aroclor 1242	ND	ND	ND	ND	ND	ND	ND	ND	ND
Aroclor 1248	3.20	1.70	0.02 J	8.40	0.38	6.00	ND	5.60	4.10
Aroclor 1254	ND	ND	ND	ND	ND	ND	0.048	ND	ND
Aroclor 1260	ND	ND	ND	ND	ND	ND	ND	ND	ND
Total PCBs	3.20	1.70	0.02	8.40	0.38	6.00	0.048	5.60	4.10

NOTES:
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2) All samples analyzed by SW8082
3) All concentrations are presented in milligram per kilogram (mg/kg).
4) ND denotes not detected at the reporting limit.
5) J denotes analyte detected below quantitation limits
6) Highlighting indicates the concentration exceeds the NYSDEC soil cleanup objective of 1 mg/kg

TABLE 1
SUMMARY OF PCB CONCENTRATIONS IN SOIL
Luster Coate Metallizing Site 828113
East Buffalo Street
Churchville, New York

Analyte	SS-131	SS-132	SS-133	SS-134	SS-135	SS-136	SS-137	SS-138	SS-139
Aroclor 1016	ND	ND	ND	ND	ND	ND	ND	ND	ND
Aroclor 1221	ND	ND	ND	ND	ND	ND	ND	ND	ND
Aroclor 1232	ND	ND	ND	ND	ND	ND	ND	ND	ND
Aroclor 1242	ND	ND	ND	ND	ND	ND	ND	ND	ND
Aroclor 1248	0.79	7.80	140	8.50	1.00	0.28	9.80	2.50	0.60
Aroclor 1254	ND	ND	ND	ND	ND	ND	ND	ND	ND
Aroclor 1260	ND	ND	5.8	ND	ND	ND	ND	ND	ND
Total PCBs	0.79	7.80	145.8	8.50	1.00	0.28	9.80	2.50	0.60

Analyte	SS-140	SS-141	SS-142	SS-143	SS-144	SS-145	SS-146	SS-147
Aroclor 1016	ND	ND	ND	ND	ND	ND	ND	ND
Aroclor 1221	ND	ND	ND	ND	ND	ND	ND	ND
Aroclor 1232	ND	ND	ND	ND	ND	ND	ND	ND
Aroclor 1242	ND	ND	ND	ND	ND	ND	ND	ND
Aroclor 1248	8.10	0.66	4.00	0.63	2.30	ND	ND	ND
Aroclor 1254	ND	ND	ND	ND	ND	ND	ND	ND
Aroclor 1260	ND	ND	ND	ND	ND	ND	ND	ND
Total PCBs	8.10	0.66	4.00	0.63	2.30	ND	ND	ND

NOTES:
1) All samples are of surface soil, unless and depth is indicated
2) All samples analyzed by SW8082
3) All concentrations are presented in milligram per kilogram (mg/kg).
4) ND denotes not detected at the reporting limit.
5) J denotes analyte detected below quantitation limits
6) Highlighting indicates the concentration exceeds the NYSDEC soil cleanup objective of 1 mg/kg

TABLE 2
PROPOSED EXCAVATION SUMMARY
Luster Coate Metallizing Site 828113
East Buffalo Street
Churchville, New York

Excavation Area	Sample Locations within Area	Waste Type	Estimated Tons of Soil
No. 1	SS-06, SS-125, SS-127, SS-132, SS-134, SS-135	non-TSCA	243
No. 2	SS-133	TSCA	32
No. 3	SS-03, SS-129, SS-130, SS-137, SS-138	non-TSCA	200
No. 4	SS-122, SS-123	non-TSCA	38
No. 5	SS-101, SS-102, SS-116	non-TSCA	119
No. 6	SS-H1, SS-121	non-TSCA	8
No. 7	SS-H2, SS-11, SS-12, SS-21, SS-120	TSCA	81
No. 8	SS-H3, SS-16, SS-105, SS-118, SS-119, SS-140, SS-144	non-TSCA	375
No. 9	SS-142	non-TSCA	13

Notes:

TSCA = Toxic Substances Control Act

ATTACHMENT A
Upstate Laboratory, Inc. Sample Data Summary Package

(To be included in the Final Soil Sampling Report)