

STATE OF NEW YORK : DEPARTMENT OF ENVIRONMENTAL CONSERVATION

In the Matter of the Development and Implementation of a Field Investigation for an Inactive Hazardous Waste Disposal Site Under Article 27, Title 13, of the Environmental Conservation Law of the State of New York (the "ECL")
by

ORDER
ON
CONSENT

NIAGARA MOHAWK POWER CORPORATION
300 Erie Boulevard West
Syracuse, New York 13202,

Respondent

WHEREAS:

1. The New York State Department of Environmental Conservation (the "Department") is responsible for the enforcement of Article 27, Title 13, of the ECL entitled "Inactive Hazardous Waste Disposal Sites".
2. Respondent, Niagara Mohawk Power Corporation, owns real property along the west side of River Road in the Town of Tonawanda in Erie County, New York. Said property has been referred to locally as the "Cherry Farm Site" (the "Site").
3. Based upon data and information available to it, the Department alleges that wastes generated by various industrial and commercial processes may have been disposed of at the Site and that some of those wastes may have been hazardous wastes.
4. Pursuant to the provisions in Article 27, Title 13, of the ECL, the Department has listed the Site as an inactive hazardous waste disposal site and has determined that certain field investigations are required to further define conditions at the Site and any remedial actions which may be necessary.
5. Respondent, in a spirit of cooperation and as a concerned corporate citizen of the State of New York, and without admission or adjudication of any issue of law or fact, voluntarily consents to the issuing and entering of this Order, waives its right to a hearing herein as provided by law, and agrees to be bound by the provisions, terms and conditions of this Order.
6. The purposes and goals of this Order are to develop and implement a field investigation program at the Site to gather data to assist Respondent and the Department in evaluating the

Site. Respondent acknowledges that the Department intends to utilize such data in determining whether or not, and to what extent, if any, additional investigation and/or remedial work may be necessary at the Site.

7. Respondent has retained as a consultant the engineering firm of O'Brien & Gere Engineers, Inc. and has submitted to the Department a conceptual work plan for the field investigation. This finalized work plan, as approved by the Department, is attached to this Order as Appendix A.

NOW, THEREFORE, having considered this matter and been duly advised, it is ORDERED that:

I. Respondent will undertake a field investigation of the Site which shall include those activities necessary to compile a Final Report and shall include, but shall not be limited to, the following activities as indicated in Appendix A:

- a) An investigation of the nature of any wastes and the areal extent and vertical distribution of any wastes and any contamination resulting therefrom at the Site by means of test borings and soil samples taken at appropriate locations on the Site, as well as sediment and surface water samples taken at the Site;
- b) An investigation of contamination of surface water bodies on the Site; and
- c) An investigation of contamination of groundwater at the site by means of monitoring wells installed at the Site and by means of groundwater sampling of these monitoring wells.

II. Respondent shall notify the Department at least forty-eight (48) hours in advance of any field work proposed to be conducted at the Site and shall allow a representative of the Department to attend and observe any field work at the expense of the Department.

III. Respondent shall commence implementation of the field investigation in accordance with the provisions of this Order no later than thirty (30) days after the effective date of this Order.

IV. After the completion of the field investigation activities and analyses, Respondent shall submit to the Department a written report on the field investigation (the "Final Report"), which

shall include a detailed and comprehensive summary and analysis of the data gathered pursuant to the field investigation, when such is completed. This Final Report shall be submitted no later than February 14, 1986, subject to the provisions of paragraph XI.

V. The Department shall have the right to obtain "split samples" of all substances and materials sampled by Respondent in the course of the field investigation, at the Department's own cost and expense and provided the Department provides its own receptacles for any split samples taken under this provision. As used herein, "split samples" shall mean whole samples divided into aliquots, to be tested by the Department for the purpose of comparative analysis.

VI. Respondent shall confer with the Department and obtain the Department's consent for the utilization of any data or analytical information related to the Site gathered from reports, studies, or investigations not conducted pursuant to this Order. The Department shall base its consent upon receipt of supporting facts and circumstances which confirm that the methods, procedures and protocols utilized in obtaining such information would have been approvable by the Department if performed pursuant to this Order if Respondent desires to use such information in completing its Final Report.

VII. Nothing contained in this Order shall be construed as barring, diminishing, adjudicating or in any way affecting any legal or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the Department or Respondent may have against any other party, or the Department's right to bring any actions or proceedings of any kind with respect to areas or resources that may have been affected or may be affected in the future as a result of the release or migration of hazardous wastes, or contamination derived therefrom, against the Respondent or any other party.

VIII. Respondent, after written notification, shall permit any duly designated officer, employee, consultant, contractor or agent of the Department to enter upon the Site to make or cause to be made such tests as are determined by the Department to be necessary, and to ascertain Respondent's compliance or noncompliance with this Order, all such entries and tests to be at the sole expense of the Department. Such persons shall abide by all applicable safety programs and protocols.

IX. Respondent shall bear the costs incurred in the development, implementation and administration of the field investigation, together with the preparation of the Report and other work required by this Order. However, Respondent shall not be responsible for or bear any costs incurred by the Department, as regards the Department's implementation of this Order.

X. The provisions, terms and conditions of this Order, and any actions or submissions under or by reason of the provisions, terms and conditions hereof, shall not, in any action or proceeding or litigation whatsoever, whether or not brought by the Department, constitute or be construed as an adjudication or finding on any issue, or be construed as, or operate as, an admission that Respondent has violated any law or regulation or otherwise committed a breach of any duty at any time.

XI. Respondent shall not be in default or violation of this Order if Respondent is unable to comply with any provision of this Order, or to meet any schedule or deadline imposed by this Order, because of the action of any national, state, or local government body or court, an act of God, war, strike, riot or catastrophe. Respondent shall notify the Department in writing upon obtaining knowledge of such an event and seek appropriate modifications of this Order.

XII. If, for any reason, Respondent desires that any provision of this Order be changed, Respondent shall make timely written application therefor to the Commissioner setting forth reasonable grounds for the relief sought.

XIII. The effective date of this Order shall be the date this Order is signed by the Commissioner or his designee and written notice thereof is received by Respondent.

XIV. The Department reserves the right to pursue any relief provided by law in the event that Respondent fails to comply with any provisions of this Order or the Appendix attached hereto.

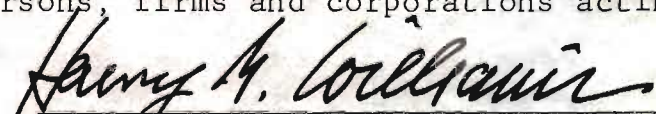
XV. All reports and submissions required by this Order shall be made to the Division of Environmental Enforcement, New York State Department of Environmental Conservation, 600 Delaware Avenue, Buffalo, New York 14202, with a copy to be sent to the Division of Environmental Enforcement, New York State Department of Environmental Conservation, 50 Wolf Road, Albany, New York 12233-0001, and to the Division of Solid and Hazardous Waste, Room 209, 50 Wolf Road, Albany, New York 12233-0001.

XVI. In the event that Respondent proposes to convey the whole or any part of its interest in any portion of the Site to any other party, Respondent shall notify the Department, in writing, prior to the consummation of such conveyance, of the identity of such other party and the nature and intended date of the proposed conveyance. Respondent shall advise such other party, in writing, with a copy sent to the Department, concerning the applicability of this Order.

XVII. The provisions of this Order shall be deemed to bind Respondent, its officers, directors, agents, employees, successors and assignees, and all persons, firms and corporations acting under or for Respondent.

DATED:

12/3/80



Henry G. Williams
Commissioner

CONSENT BY RESPONDENT

Respondent hereby consents to the issuing and entering of the foregoing Order, waives its right to a hearing herein as provided by law, and agrees to be bound by the provisions, terms and conditions contained herein.

NIAGARA MOHAWK POWER CORPORATION

By: John M. Tuennies

Title: Environmental Affairs Director

Date: 9/30/85

STATE OF NEW YORK)
COUNTY OF Ontonago) ss.:

On this 30th day of Sept, 1985, before me personally came John M. Tuennies, to me known, who, being by me duly sworn, did depose and say that he resides in 300 Erie Blvd Syracuse NY; that he is the Environmental Affairs Director of Niagara Mohawk Power Corp the corporation described in and which executed the foregoing instrument; that he knew the seal of said corporation; that the seal affixed to said instrument was such corporate seal; that it was so affixed by the order of the Board of Directors of said corporation, and that he signed his name thereto by like order.

Thomas J. Rooney
THOMAS J. ROONEY
Notary Public, State of New York
Qualified in Erie County
My Commission Expires March 29, 1986

Notary Public

Task I - Site Investigations

Geophysical Surveys

Site specific information on the subsurface materials at the Cherry Farm site is not available. To better define the subsurface characteristics, three types of geophysical surveys will be employed. The methods selected for this task are Terrain Conductivity (EM), Magnetics, and Electrical Resistivity. The correlation of these individual surveys will provide data regarding depths of fill, presence of metallic objects and the nature of the geology beneath the site (such as fine grained deposits, and bedrock).

The EM and Magnetometer surveys are best conducted with the use of a surveyed site grid. This grid will encompass the entire site and extend beyond the face of the fill area by 100 feet. A grid spacing of 50 feet has been determined to be best suited for this investigation to provide sufficient data needed in a cost-effective manner. The grid stations will be surveyed based upon previously established boundaries at the site. More detailed surveys will be performed at the location of the proposed monitor wells and soil borings.

Terrain Conductivity Survey. The terrain conductivity survey will be conducted over the grid area to aid in horizontal definition of the subsurface materials. A Geonics Limited "terrain conductivity" meter (Model EM-31) will be employed during this survey. This instrument employs inductive electromagnetics to measure variations in the conductivity of the soils, other fill materials. The survey data will be reduced to a contour map to facilitate evaluation.

Magnetometer Survey. A magnetometer survey of the site will be conducted to identify areas of buried ferrous objects. An EG & G Geometrics Proton Magnetometer (Model G-816/826) will be used during the survey. A base station will be established away from any potential fill areas and will be monitored periodically during the survey. The survey data will be corrected for diurnal variations based upon the base station readings. The data will then be reduced to a contour map to facilitate evaluation.

Resistivity Survey. An electrical resistivity survey will be conducted to provide vertical profiles of the unconsolidated materials and determine the depth to bedrock. Resistivity soundings will be performed at up to 15 stations on and adjacent to the suspected fill area. The resistivity survey will be performed with a Bison 2390T transmitter and 2390R receiver. Each station will be staked for the location and elevation surveys. The interpretation of the resistivity data will be assisted by the use of a computer program developed by A.A.R. Zohdy (A Computer Program for the Automatic Interpretation of Schlumberger Sounding Curves Over Horizontally Stratified Media, 1973, by A.A.R. Zohdy NTIS PB-232 703).

Air Monitoring Program

This task consists of a detailed site survey of air quality. A model P 1 101 Photoionization Analyzer (HNU Systems, Inc.) will be used during the air monitoring program. The air monitoring survey will be conducted along up to five traverses across the site and along the entire fill face. This air monitoring survey will be conducted on a warm, relatively windless day. Meteorologic data will be collected from the nearest existing station. The data will be evaluated with respect to location and level of any observed air quality readings exceeding background.

Drilling/Monitor Well Installation

A total of six, two-inch monitor wells will be installed at the Cherry Farm Site (see Figure). Two of these wells will be installed upgradient of the site, between the drainage channels and River Road. The remaining four monitor wells will be installed along the western bank of the landfill, considered downgradient of the site. While, in some situations one upgradient and three downgradient wells are considered satisfactory by the DEC, the elongated nature of the site suggest the need for installation of additional monitor wells.

The test borings will be completed using standard hollow stem auger drilling methods. The test borings for one upgradient well will be completed to 10 feet below the first encountered groundwater estimated to be a total depth of 15 feet. Three of the test borings for the downgradient wells will be completed to 10 feet below the base of the fill material or 10 feet below the first encountered groundwater, whichever is greater. The estimated total depth of these test borings is 35 feet. The remaining two test borings (one upgradient, one downgradient) will be completed to bedrock which is estimated to be approximately 80 feet below the ground level. It is suggested, however, in the event a confining layer is encountered, that drilling cease at a depth 10 feet into the layer to prevent vertical migration of groundwater.

Soil samples will be collected using Standard Split Barrel Sampling Method ASTM-D-1586. These samples will be collected continuously to 10 feet below the first encountered groundwater table at the upgradient well locations and 10 feet below the base of the fill material at the downgradient well locations or 10 feet below groundwater table whichever is greater. At the two well locations where the test borings will be completed to bedrock, soil samples will be collected at five-foot intervals at depths beyond 10 feet below the base of the fill material (downgradient location) or 10 feet below the first encountered groundwater table (upgradient location). All sample spoons will be decontaminated between samples using approved decontamination procedures.

Gamma ray logs will be conducted within the two deeper boreholes to enhance the sampling data. This logging will be used to correlate between the five-foot sample spacing.

Upon completion of the gamma ray logging the two deeper boreholes will be filled with a bentonite/cement grout to the same depth as the associated upgradient or downgradient wells. This procedure will seal off the lower



SITE INVESTIGATION PLOT PLAN

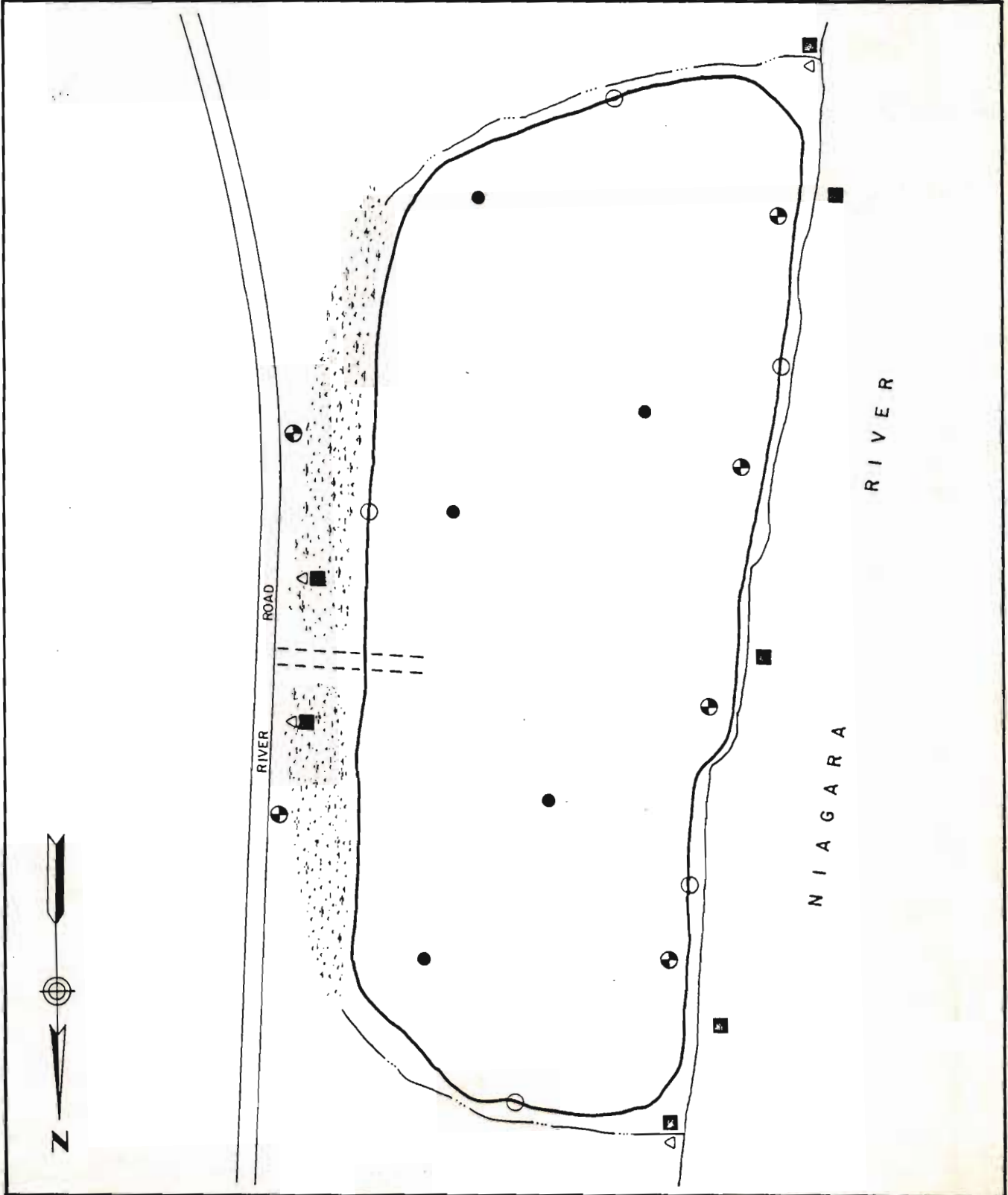
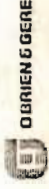
Niagara Mohawk Corp.
Cherry Farm Site
Tonawanda, New York

LEGEND

- ⊕ MONITOR WELL
- SOIL BORING
- △ SURFACE WATER SAMPLE
- SEDIMENT SAMPLE
- SOIL SAMPLE (SHALLOW)

NOTE: All sample locations are tentative. Exact locations will be determined based on the geophysical survey results.

APPROXIMATE SCALE



part of the aquifer and prevent vertical migration of groundwater in the boreholes.

As recommended in the NYSDEC Phase II investigation procedures, the collected soil samples will be screened with an HNU immediately after each split- spoon is opened. One unsaturated soil sample from an upgradient test boring, two samples from the fill material and one soil sample of the material immediately underlying the fill material will be collected at selected downgradient well locations based on the HNU readings. These samples will be packaged in accordance with the procedures outlined in Samples and Sampling Procedures for Hazardous Waste Streams (EPA-600/2-80-018).

In addition to the chemical analysis, the NYSDEC requires that three soil samples collected from the screened intervals of selected monitor well locations be analyzed for grain size, Atterburg limits and moisture content. One of these samples will be collected from an upgradient well location and two will be collected from a downgradient well locations.

Monitor Well Installations

Monitor wells will be installed in each test boring. The two upgradient wells will be installed to 7 feet below the first encountered groundwater and the screen will extend up to 3 feet above the water table where possible in anticipation of seasonal groundwater fluctuations. The screen bottom of the four downgradient wells will be installed 15 feet below the base of the fill dependent upon the nature of the materials. The screened intervals for the downgradient wells were selected to monitor the groundwater system below the landfill and not the isolated groundwater mound which may be present within the landfill material itself suggested by the site topography.

The monitor wells will be constructed of 2-inch I.D. .010-inch slot, stainless steel well screen, appropriate steel riser casing and vented cap. The screen lengths of the upgradient wells and downgradient will be 10 feet. It has been our experience that PVC wells have been acceptable to NYSDEC on certain occasions. This proposal assumes that stainless steel screens will be used. If this point is negotiated with NYSDEC substantial costs may be eliminated by using PVC wells.

The screen and riser assembly will be placed to the bottom of the completed borehole. A washed graded sand will be placed around the screen and extended 2' above the top of the screen. A 2-3' thick bentonite pellet seal will be placed above the sand pack and the remaining annulus will be filled with a bentonite/cement grout to within 2' of the ground surface. A 4-6" diameter locking steel casing will then be placed over the well and cemented in place.

Well Development

Each of the monitor wells will be developed after a minimum of 24 hours has elapsed since the installation was completed. An air surging method or bailing will be used for the development. This procedure will continue until each well yields sediment free water. Water levels will be measured before and after the development process.

In-situ Permeability Tests

In-situ permeability tests will be performed on each well to determine the horizontal permeability of the aquifer material beneath the fill material. This test will be conducted by introducing a solid bar or rod made of teflon or comparable material into the well to displace the water within the well. The water level is measured before the rod is inserted into the well and measured at predesignated time intervals thereafter. The recorded data is then analyzed using Hvorslev's Method.

Decontamination

All drilling equipment and associated tools, including augers, drill rods, sampling equipment, wrenches and any other equipment or tools that have come in contact with contaminated materials shall be decontaminated using high pressure detergent steam cleaning equipment and followed by a clean water rinse. The water used for decontamination shall be obtained from a controlled water source such as a municipal drinking supply.

Soil Sampling

A total of 10 soil samples will be collected for analysis in addition to the four samples previously collected during the monitor well drilling. Five of the soil samples will be collected from within the landfill and five will be collected along the face of the landfill. These samples will be used to characterize the chemical characteristics of the fill material.

The soil samples within the landfill will be collected at five foot intervals to the base of the landfill (approximately 20') using standard hollow stem augers and split barrel sampling method ASTM-D-156. The sample will be collected and handled according to EPA 600/2-80-018. Following the collection of each soil sample, the auger and spoon will be decontaminated in accordance with the approved procedure to prevent cross-contamination between samples. The five soil samples collected within each borehole will be composited for analyses.

Upon completion of the soil sampling, each borehole will be grouted to the surface with a cement/bentonite slurry. This will prevent vertical migration of surface and groundwater through the boreholes.

The five soil samples collected from the face of the landfill (minimum of one per side) will be collected between one and three feet below the surface. These samples will be collected as grab samples according to the accepted procedures recorded in EPA-600/2-80-018.

Surface Water and Sediment Sampling

Two drainage channels and the Niagara River encompass the suspected site fill area. The two drainage channels flow westward from areas east of River Road and empty into the Niagara River on the north and south of the site. Both water and sediment samples will be collected from these drainage channels. Additionally, sediments will be collected from the Niagara River.

The location of the sediment samples are shown on Figure 2. Three samples will be collected across the channel at each location and composited for analysis. A Lexan tube (1½-2" I.D.) will be used to collect these samples. Each sample will be described by the sampler prior to mixing it with the remaining samples for analysis. The handling and packaging of each sample will be in accordance with EPA publication EPA-600/2-80-018.

The surface water samples will be collected from the drainage channels at the same upgradient and downgradient locations as the sediment samples. These samples will be collected in accordance with the EPA Sampling Protocol listed above.

Sediment samples will be collected at three locations within the Niagara River at approximately 10' from the waters edge. The exact distance from the shoreline will be determined by accessibility by the sampling crew at the time of sampling.

Seep Sampling

Two seeps located along the fill face will be sampled to determine the quality of the groundwater in direct contact with the fill materials. The exact location of these seeps will be determined during the sampling effort as they may be periodic in nature.

The sampling methods employed for the seep water will be in accordance with the EPA Sampling Protocol EPA-600/2-80-018.

Well and Sample Location Survey

All monitor well and sampling points will be surveyed to establish their location and elevation. In addition, selected spot locations and elevations will be surveyed for preparation of a non-topographic site map. The survey will be based on a previously established benchmark located at the site.

Sample Analysis

A total of twenty one (21) soil/sediment samples and twelve (12) water samples will be collected from the Cherry Farm site. A screening process will be used to select those samples which will be analyzed in more detail. Our experience indicates that this method of analysis procedure is cost-effective and at the same time provides the information required to assess the general chemical characteristics of the site and is acceptable to NYSDOS.

Each sample, upon collection, will be screened in the field for volatiles using the HNU photoionization detector in addition to pH and temperature. The screening process will be completed in the laboratory using specific conductance and Total Organic Carbon (TOC) analyses. These analyses will provide general information regarding inorganic (including metals) and organic constituents within each sample.

Based on the results of the screening analysis, samples will be selected for full EPA priority pollutant analysis. The samples will be divided into four categories for selection for further analyses:

- Groundwater - collected from the monitor wells
- Surface Water - collected from the drainage channels
- Sediments - collected from the drainage channels and the Niagara River
- Soil - collected from the test borings and landfill face.

Two samples from each of these categories will be selected. In the first three categories, one of the samples will represent the upgradient conditions and one will represent the "worst case" downgradient conditions based on the results of the screening analyses.

It is not possible to separate the soil samples into upgradient or downgradient samples due to the inherent nature of the soil ad landfill. Instead, two composites will be made based on the screening analysis results for priority pollutant analysis.

The analysis procedures employed by the laboratory will be in full accordance with approved EPA methods as described in EPA Publication SW-846 1980 - Test Methods for Evaluating Solid Wastes and Federal Register Volume 49 Number 209; October 26, 1984. The QA/QC policies of the O'Brien & Gere Laboratory are attached.

Report Preparation

Following the completion of the site investigation a report will be prepared to summarize the investigation procedures, results and observations. This report will include all of the data collected in the form of boring logs, permeability data, chemical analysis results and well diagrams. The methodology used to obtain the data will be explained and presented as well.

The results of the investigation will be summarized and presented in the form of tables, plot plans, groundwater flow maps and cross-sections. The observed characteristics of the landfill as determined by the investigation and its relationship to local and regional hydrogeology will also be discussed. This report will follow the NYSDEC format for Phase II investigations.

July 12, 1985

Mr. Raymond E. Lupe, P.E.
Senior Sanitary Engineer
Bureau of Hazardous Site Control
NEW YORK STATE DEPARTMENT OF
ENVIRONMENTAL CONSERVATION
50 Wolf Road
Albany, New York 12233-0001

Dear Mr. Lupe:

SUBJECT: Proposed Phase II Site Investigations at
Niagara Mohawk Power Corporation's
Cherry Farm Property - Site Code #915063

This letter is in response to your July 1, 1985 letter which outlined various work plan modifications deemed necessary by the Department for the subject investigations. It is Niagara Mohawk's understanding that Department concerns relative to an adequate definition of the site's groundwater flow regime, the suitability of the proposed heated head space screening process, and the recent discovery of buried drums by the NYSDOT in the vicinity of the Niagara Mohawk and INS property line have formed the basis for requiring these modifications.

Niagara Mohawk has reviewed these modifications with O'Brien & Gere, the Phase II contractor, and has discussed them further with you during recent telephone conversations and during the July 11, 1985 meeting held at your office. In view of the Department's concerns relative to these investigations, Niagara Mohawk considers the modifications to be reasonable and justified. Niagara Mohawk hereby agrees to modify the proposed Phase II work plan in accordance with your July 1, 1985 letter. The Phase II contract with O'Brien & Gere will be revised to incorporate these modifications.

Niagara Mohawk's specific responses to the modifications as outlined in your July 1st letter are provided as follows:

1. Monitoring Wells: The proposed groundwater monitoring program will be modified as follows to assure that the groundwater regime is adequately defined and monitoring wells yield appropriate information:
 - a. The northernmost, upgradient well will be relocated to the northeast section of the site in the vicinity shown on the attached diagram. Information generated by the geophysical surveys may be used in selecting the specific location of this well within the northeast section of the site.
 - b. One additional monitoring well will be installed in the southeast portion of the site in the vicinity shown on the attached diagram. Geophysical survey information may be utilized to specifically locate this well in the southeast portion of the site.
 - c. Well screens will be installed with the top of the well screen located approximately one foot above the encountered groundwater table. Decisions to screen the wells in a different manner will be made in consultation with the Department representative.
 - d. The borings and monitoring wells will not penetrate any confining layers. Borings and monitoring wells will be terminated after passing through no more than four feet of any encountered confining layer unless otherwise agreed upon by Niagara Mohawk and the Department representative. Boring logs documenting groundwater elevations, geology, and well screen locations will be submitted as part of the Phase II report.

2. Sample Analysis
 - a. A groundwater sample from each of seven monitoring wells will be analyzed for heavy metals and given a GC/MS scan identifying all peaks greater than 10% of the nearest calibrating standard.
 - b. The two sediment samples selected for heavy metals analysis and GC/MS analyses will be collected from an undisturbed drainage channel.
 - c. The decision of whether or not to collect sediment and water samples from the Niagara River and the disturbed drainage channel will be based upon the observed field conditions.

2. Sample Analysis - Con't.

- d. Three composite samples of soils and waste material will be analyzed for organic chemicals via a GC/MS scan (w/peaks identified). The heated head space analysis will be used in conjunction with USGS data to determine which three samples will be selected for organic chemical analyses. If appropriate, a composite leachate sample will be substituted for one of the above samples.
- e. E.P. toxicity tests will be conducted on soil/sediment samples exhibiting relatively high concentrations of heavy metals.
- f. Heated head space analyses will be conducted on an aliquot of each sample to assure sample integrity.

3. Miscellaneous

- a. Drilling equipment and other large equipment requiring decontamination will be steam cleaned.
- b. Drums containing well cuttings and drilling fluids will be maintained in a secure location on the property. This security will be maintained through the use of a temporary fence or storage shed, trailer, etc.

With the adoption of the above modifications, Niagara Mohawk trusts that the proposed Phase II work plan is now acceptable to the Department. Please provide me with a letter which indicates the Department's approval of the work plan as soon as possible.

Don't hesitate to call me at (315) 428-6624 should you have any questions.

Very truly yours,



Michael W. Sherman
Assoc. Environmental Analyst

MWS/ds
Attachment

cc: J. J. Hennigan
J. L. Krajewsky (DEC - Buffalo)
J. T. Lacy (DEC - Buffalo)
J. M. Toennies/T. J. Rooney/F. L. Sciortino
E. C. Tifft (O'Brien & Gere)

SITE INVESTIGATION PLOT PLAN

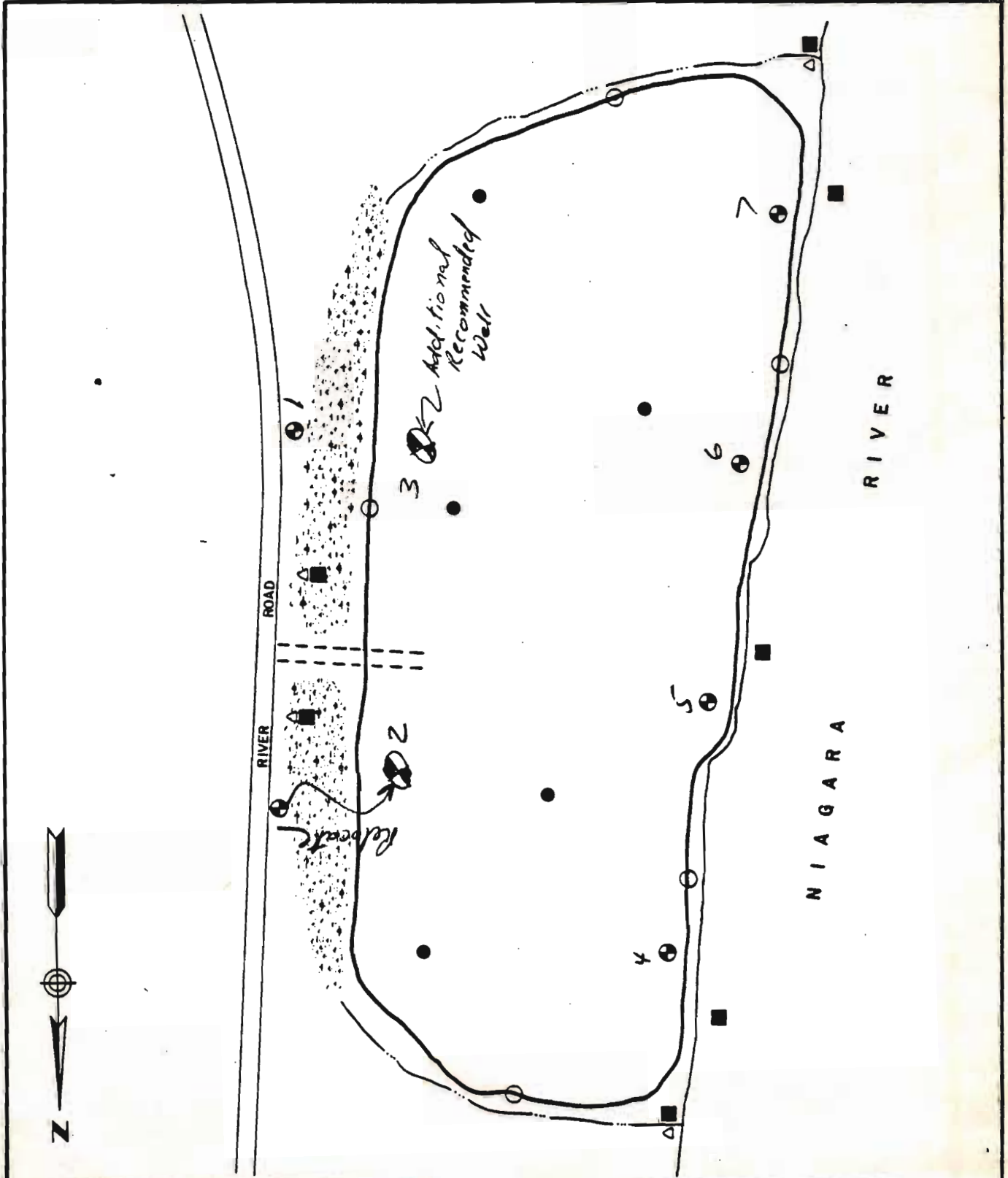
Niagara Mohawk Corp.
Cherry Farm Site
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NOTE: All sample locations are tentative. Exact locations will be determined based on the geophysical survey results.

APPROXIMATE SCALE



Task II - Hazardous Ranking System Scoring

The Hazardous Ranking System Scoring will include completion of all pertinent data, documents and records; completion of the HRS Data Worksheets; explanations of input values used in HRS worksheets; and a discussion of the HRS model in general.

The documents and information used in the HRS will include: Task I investigation results; site history data compiled by Niagara Mohawk personnel; public utility documents and published government reports on the geology, groundwater, climate and natural resources of the area. The references used in this effort will be documented in a bibliographic form. Care will be taken to insure that all data collected for use in the preparation of the HRS Worksheets is factual and substantiated.

The HRS worksheets will be prepared under the direct supervision of our Toxicologist who has had previous experience with this ranking system. The EPA document Uncontrolled Hazardous Waste Site Ranking System: A User's Manual (#HW10) will assist in this effort.

The rationale behind each value within the HRS Worksheet will be discussed as required by the EPA regulations. This discussion will include references where applicable and will be based on factual data.

Report Preparation

A report will be prepared upon completion of the HRS Worksheets and associated work efforts. This report will include the completed HRS Worksheets; documentation of the information used in the preparation of the HRS Worksheets, and the rationale used in determining the values used in the HRS worksheets.

In addition to the worksheet information, a general discussion of the HRS model will be included in this report. This discussion will serve to explain the reasoning behind the HRS Model, its sensitivity and/or accuracy as well as the basic assumptions and limitations of this ranking system.