SR

BENCHMARK
ENVIRONMENTAL
ENGINEERING &
SCIENCE, PLLC

July 18, 2007

Mr. Stan Radon
Engineering Geologist II
New York State Department of Environmental Conservation
270 Michigan Avenue
Buffalo, NY 14203

Re: ISOCHEM Inc. – Lockport Facility
REVISED Site Monitoring Program and Creek Bank Clean-up Approach

Dear Mr. Radon:

On behalf of ISOCHEM, Inc., Benchmark Environmental Engineering & Science (Benchmark). has prepared this revised DNAPL monitoring and Eighteen Mile Creek bank cleanup plan as a follow-up to the investigations conducted over the past six months with respect to the DNAPL assessment and recovery in Well MW-2D, the creek bank inspections conducted along Eighteen Mile Creek and the initial manual coal tar removal activities conducted the week of June 11, 2007. In general, ISOCHEM is prepared based on the investigation findings and results of the initial removal activities to perform the follow-up monitoring and clean-up tasks as discussed at our May 10 and June 14, 2007 meetings related to:

- Performance of quarterly product monitoring, product removal (if necessary) and documentation of these activities at wells MW-2D and the adjacent MW-7D (new well).
- Removal, profiling and disposal of coal tar deposits observed along an approximately 100 foot long section of the Eighteen Mile Creek bank (from the toe of the slope to the creek bank) below the facility.
- Conducting a quarterly visual survey of the creek bank area subsequent to the planned cleanup as described above to determine/document if further or new breakouts of coal tar are occurring.

The planned monitoring and cleanup activities proposed are presented in further detail below:

Task 1: Perform Quarterly DNAPL Well Monitoring and Documentation

ISOCHEM will conduct quarterly inspections of the two adjacent wells, MW-2D and MW-7D to determine whether DNAPL accumulation has occurred. The determination will be made with an interface probe. If DNAPL is present, the on-site DNAPL recovery pump will be utilized to remove product from either well. All measurements, observations, recovered DNAPL quantities and any other relevant data will be recorded from each event and compiled into an annual monitoring report for submission to the NYSDEC

Task 2 Remove and Dispose of Creek Bank Residuals

As a result of initial manual residual removal activities conducted during the week of June 11, 2007, it was determined that the areal and vertical extent of the solidified residuals was more extensive than initial assessment indicated. The residuals that have solidified at the surface appear to be just the visual portion of a variable layer of residuals deposition (approximately 0- 12 inches thick) that flowed from the toe of the slope at various locations and pooled/solidified near or at the edge of the creek bank. This material generally has a shallow layer of sediment/soil and organic debris covering it.

It was agreed that continued manual removal techniques would not be sufficient or effective and mechanical excavation techniques would be required to perform the more extensive residuals removal required. Specifically, ISOCHEM will perform cleanup/removal and disposal of all visible accumulated coal tar residuals that are exposed and present in an approximately 100 foot span between the banks of 18 Mile Creek and the toe of the slope in the area south of MW-2D. In this approximately 100 foot span the toe of the slope varies in width from approximately 10 to 30 feet from the edge of the creek bank. Residuals will be excavated, removed and placed in appropriate containers for consolidation in a roll-off container for transportation and off-site disposal. Although unlikely based on the physical condition of the residuals encountered to date, if any active flow of material is encountered during these excavation activities, ISOCHEM is prepared to collect and dispose of this material accordingly. Prior to initiation of excavation activities reinforced silt fence will be installed along the entire length of the creek bank edge to minimize erosion of sediment from the excavated area prior to restoration activities. NYSDEC will be invited to inspect the clean-up activities during the performance of the work.

In conjunction with the cleanup effort, ISOCHEM will collect, per the NYSDEC's request, one surface water sample from the "wetland area" noted during the Departments site walkover. The sample will be analyzed for the TCL semi-volatile compound list.

The waste residuals generated from the cleanup will be profiled and disposal arrangements will be coordinated as required for permitted off-site disposal.

Upon completion of the cleanup work, ISOCHEM will prepare a summary letter report that documents the work performed and amount of residuals collected and sent off-site for disposal.

Task 3: Creek Bank Restoration

It is anticipated that approximately 80 to 100 CY of coal tar residuals may be removed from the impacted creek bank area. ISOCHEM proposes to restore the excavated area along the creek bank with the placement of clean topsoil and seed the area with a fast germinating annual rye grass to establish vegetative cover and prevent erosion until native vegetation can take over. Along the edge of the creek bank, rip rap will be placed approximately 3 feet wide the entire length of the clean-up area to further mitigate bank erosion after completion of excavation and soil replacement activities.

Task 4: Perform Annual Visual Survey of the Creek Bank

ISOCHEM will perform annual visual inspections of the creek bank location that underwent cleanup to document whether further coal tar breakouts or deposition is occurring. The results of these inspections will be summarized and included with the annual report for the DNAPL. ISOCHEM will notify the Department when these inspections will be performed to allow for a coordinated inspection if desired by the Department.

SCHEDULE

ISOCHEM is prepared to initiate work on the above referenced tasks immediately upon written approval from Department to proceed. We anticipate that Tasks 2 and 3 (Creek Bank Cleanup and Restoration) will require one to two weeks to complete and may be initiated the week of June 25 based on equipment and personnel availability. Routine monitoring events as described in Tasks 1 and 4 would be initiated after the creek bank cleanup has been completed. Annual well and creek bank monitoring and reporting that is likely to be required beyond 2007 may be requested by ISOCHEM to be reduced from quarterly to semi-annual frequency if the results of the quarterly monitoring indicate that this warranted and the Department concurs with this request.

Please contact us at 856-0599 if you have any questions or comments concerning this proposed Work Plan.

Sincerely,
Benchmark Environmental Engineering & Science, PLLC

Patrick T. Martin, P.E
Project Manager