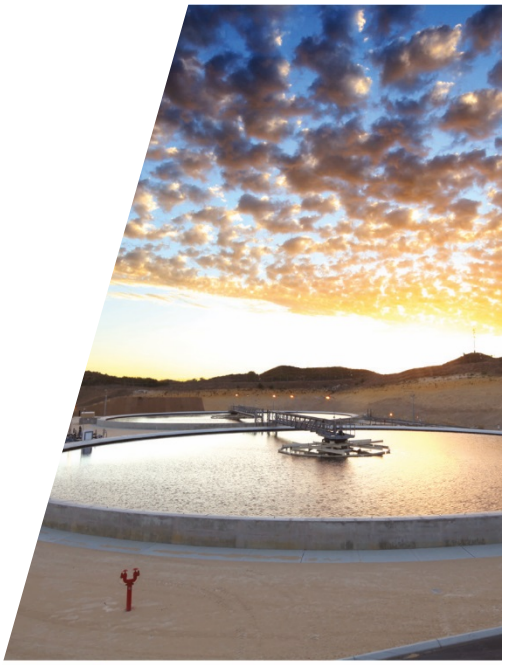
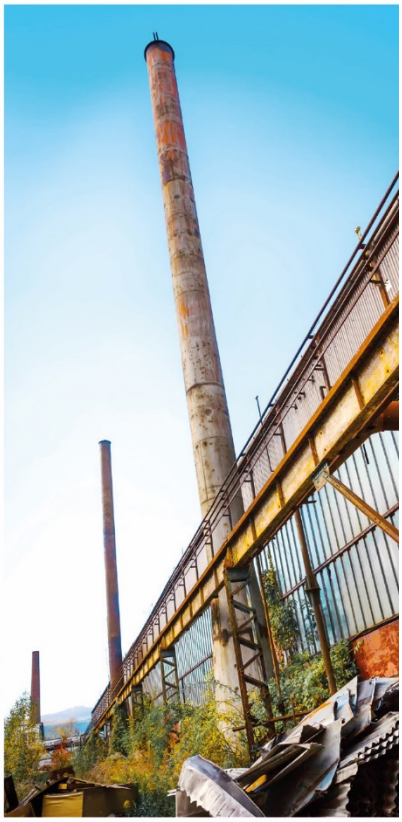


Third Addendum to the Supplemental Sewer Investigation Work Plan

Ex-Eaton Site
34-40 Clinton Street
Batavia, New York
Site No. C819022

CNH Baumaschinen GmbH
Berlin, Germany



NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Division of Environmental Remediation, Region 8
6274 East Avon-Lima Road, Avon, NY 14414-9516
P: (585) 226-5353 I F: (585) 226-8139
www.dec.ny.gov

November 26, 2019

Klauss Rekitt
c/o Ronald Hull, Esq.
Heisman Nunes & Hull, LLP
69 Cascade Drive, Suite 102
Rochester, New York 14614

Re: Ex-Eaton Site (#C819022)
22-40 Clinton Street, Batavia, Genesee County
Third Addendum to the Supplemental Sewer Investigation Work Plan, September 12, 2019

Dear Mr. Rekitt;

The New York State Departments of Environmental Conservation (NYSDEC) and Health (collectively referred to as the Departments) have completed their review of the document entitled *"Addendum-Supplemental Sewer Investigation Work Plan (Drainage Ditch PCB Sampling)"* (the Work Plan) dated September 12, 2019 and prepared by GHD for the Ex-Eaton site. In accordance with 6 NYCRR Part 375-1.6, the Departments have determined that the Work Plan, with the following modifications, substantially addresses the requirements of the Brownfield Cleanup Program. The modifications are as follows:

1. Section 1, the date the Addendum to the SSI-WP was approved by NYSDEC is changed to July 12, 2010 (not July 28, 2010).

2. Section 2.3, the Departments understand that statements regarding the usability of the 2007 results are inaccurate. As the 2007 data are not directly relevant to the Work Plan, statements regarding these results are hereby deleted. This language will be revised and corrected in subsequent project documents.

3. Section 4.1.2, sampling procedures will follow DER-10 guidance. In accordance with DER 10 3.8.2, sediment samples will be collected from 0-6" interval.

4. Section 4.1.2, samples will require Category B deliverables in order to produce a Data Usability Summary Report (DUSR).

5. Section 5, the Master Schedule received on October 31, 2019 will be adhered to as the project schedule. The schedule is enforceable under the Brownfield Cleanup Agreement and is not “tentative”. Extensions to the approved schedule must be requested in writing and approved by NYSDEC.

6. Figure 1.1, the location of the “City of Batavia Drinking Water Well” is changed to “Wells”.

With the understanding that the modified Work Plan is agreed to, the Addendum-Supplemental Sewer Investigation Work Plan (Drainage Ditch PCB Sampling) is hereby approved. If you choose not to accept these modifications, you are required to notify this office within 15 days after receipt of this letter and prior to the start of field activities. In this event, I suggest a meeting be scheduled to discuss your concerns prior to the end of this period.

Please notify me at least 7 days in advance of the start of field activities.

By December 16, 2019, please attach a copy of this letter to the Work Plan and distribute the approved Work Plan as follows:

- Tasha Mumbrue (1 hard copy with an original signature);
- Julia Kenney (NYSDOH, electronic file/CD)
- The document repository at the Richmond Memorial Library, located at 19 Ross Street, Batavia, NY14020 (1 bound hard copy).

If you have questions or concerns, please contact me at (585) 226-5459 or tasha.mumbrue@dec.ny.gov.

Sincerely,

Tasha Mumbrue
Geologist Trainee

ec: Ronald Hull, HNH LLP
Adam Bautista, CNH
Dennis Hoyt, GHD
Margaret Popek, GHD
Julia Kenney, NYSDOH
Justin Deming, NYSDOH
Lisa Schwartz, NYSDEC
Frank Sowers, NYSDEC
Michael Cruden, NYSDEC
David Pratt, NYSDEC

Table of Contents

Figure Index

1. Introduction

CNH Baumaschinen GmbH (CNH) is implementing a remediation program at the Ex-Eaton Site (Site) located in Batavia, New York (Figure 1.1). The implementation of the remediation program is being completed in accordance with the Brownfield Cleanup Agreement (BCA) (Index Number C819022-03-19, New York State Department of Environmental Conservation (NYSDEC) Site No. C819022) between CNH and the NYSDEC. The Site was formerly in the Voluntary Cleanup Program (VCP). Under the VCP, CNH completed a number of on-Site and off-Site investigations to characterize the impacts resulting from historical operations at this Site. A Site plan is presented as Figure 1.2.

The facility storm sewer system has been identified as a potential pathway for the previous contamination of soil, groundwater, and soil vapor. The layout of the storm sewer is depicted on Figure 1.3. Limited information had existed on the locations of inputs, storm sewer lines, and connections within the system. Attempts at investigating the storm sewers had been hampered by a lack of information regarding the connections and flow directions of the system and that much of the visible structures (floor drains, catch basins, manholes) and sewer lines were filled with sediment and were impassable. In April 2008, the Supplemental Sewer Investigation Work Plan (SSI-WP) was submitted and accepted by the NYDEC on April 28, 2008. This was followed by the submittal of the Addendum to the SSI-WP in July 2010. The July 2010 Addendum to the SSI-WP was prepared to complete additional tasks such as storm sewer cleaning, video inspection, and mapping of the inaccessible areas of the storm sewer system and identification of those areas where exfiltration to surrounding soils and/or groundwater may have occurred. The Addendum to the SSI-WP was approved by the NYSDEC on July 12, 2010. The First Addendum was then followed by a second addendum in November 2011, which further investigated potential soil source areas beneath the main building, repaired damaged sections of the storm sewer, and accessed storm sewer sections that were not able to be accessed during the 2010 sewer cleaning. The Second Addendum was accepted by the NYSDEC on June 29, 2012.

This Third Addendum to the SSI-WP has been prepared at the request of the NYSDEC for the collection of sediment samples from the drainage ditch downstream of the storm sewer discharge points illustrated on Figure 1.3. These samples are to be analyzed for polychlorinated biphenyls (PCBs) to verify that the sewer cleaning activities conducted in 2011 and 2013 did not adversely impact the drainage ditch. The purpose for the PCB sampling is based upon the comments by the NYSDEC letter dated June 30, 2011, referring to the Fish & Wildlife Resource Impact Analysis (FWRIA) Report recommending monitoring of drainage ditch sediments at the conclusion of investigation activities that may disturb or release contaminants in the drainage ditch.

1.1 Work Plan Addendum Organization

The Third Addendum WP is organized as follows:

- Section 1.0 - The purpose and organization of the Third Addendum WP are presented in Section 1.0
- Section 2.0 - The project location, history, and project description are presented in Section 2.0

- Section 3.0 - The objectives and the Standards, Criteria, and Guidelines (SCGs) are presented in Section 3.0
- Section 4.0 - The Scope of Work is presented and described in Section 4.0
- Section 5.0 - The schedule for the implementation of the Third Addendum WP is presented in Section 5.0
- Section 6.0 – The Reporting format for the finding of the PCB analysis are presented in Section 6.0.
- Section 7.0 - Health and safety requirements are discussed in Section 7.0
- Section 8.0 - The Quality Assurance Project Plan (QAPP) is discussed in Section 8.0
- Section 9.0 - A list of the reference materials utilized in the preparation of this Third Addendum WP is presented in Section 9.0

2. Site Description and History

2.1 Site Description

The Site is situated within the City of Batavia limits as shown on Figure 1.1. The Site encompasses approximately 22.96 acres of land and is bordered to the north by Clinton Street (Route 33), to the south by the Erie Railroad, and to the east and west by residences. Properties south of the Erie Railroad are commercial/light industrial in nature with some residences intermixed. Two public water supply wells are located within 1 mile south of the Site and reportedly draw from the Tonawanda Creek Aquifer, which is located to the southeast of the Site.

A ditch runs along the northern and eastern property boundaries. The ditch originates north of the Site and receives stormwater runoff from both on- and off-Site sources. The ditch flows east and then south along the Site boundary to a culvert beneath the former Erie Railroad (Figure 1.2). Due to frequent debris blockages at the culvert along the eastern boundary of the Site, the channel is wide and poorly defined.

A discussion of historical Site ownership and usage was presented in the July 25, 1996 *Site Inspection Prioritization (SIP) Findings* report prepared by Ebasco Services, Incorporated (Ebasco). According to the Ebasco report, the Site had been used to manufacture agricultural and highway equipment since the mid-1920s. The Site was owned and occupied by Contractor Machinery from 1927 until 1963, at which time the property was sold to the Trojan Division of Eaton Corporation. In 1979, Eaton Corporation sold the property to Faun-Werke, which merged with O&K Orenstein and Koppel, Inc. in 1987. In 1996, the Site was sold to the current owner, Willow Specialties (Willow), which operates a warehousing facility for baskets and novelty items.

The property contains three buildings. The main building at the Site is a two-story concrete block office building connected to a warehouse. Willow occupies the main building. North of the main building is a second building, a former warehouse, also occupied by Willow and formerly occupied by Genesee County ARC, which was a recycling company. East of the main building is the former shipping building, which is currently used by Willow for storage. The eastern portion of

the property was formerly a storage yard, while the western and northern portions of the property had been used for storage and parking. These areas are currently unused (vacant).

Soil and groundwater at the Site are impacted with chlorinated volatile organic compounds (such as 1,1,1-trichloroethane [TCA] and 1,2-dichloroethane [DCA]), along with petroleum-based contaminants. A number of subsurface investigations have been completed at the Site, and, as a result, in 2003, CNH entered into a Voluntary Cleanup Agreement (VCA) (#B8-0644-03-09) with the NYSDEC to investigate and remediate soil, groundwater, and soil vapor impacts. In 2019, CNH entered into a BCA with the NYSDEC.

2.2 Physical Setting

The Site is a relatively flat parcel of land and is located in a commercial and light industrial area of the City of Batavia.

2.2.1 Geology

According to the 1984 United States Geological Survey (USGS) survey, the surficial geology of most of the Site is morainal till. Site investigation activities indicate that the Site is underlain by fill materials ranging in thickness from 2 to 8 feet below ground surface (bgs). Fill materials are underlain by silty sand and fine sand deposits, which range in depth from 2 to 10 feet bgs. Underlying the silty sand and fine sand deposits is a clay and silt layer ranging in thickness from 0 to 24 feet. Underlying the clay and silt layer is a sand and gravel layer, which is up to 43 feet thick. Underlying the sand and gravel deposits is a till unit consisting of clay, small amounts of gravel, and trace silt. This till unit lies above bedrock. Bedrock, identified as Onondaga Limestone, is encountered beneath the till unit at approximately 71 feet bgs.

2.2.2 Topography/Hydrology

The Site is generally flat and is approximately 890 feet above mean sea level (AMSL). Based on the topography of the Site and Site investigation activities, groundwater flow appears to be generally to the southeast.

A stormwater drainage ditch located along the north and east property boundary of the Site is responsible for much of the surface drainage at the Site. The drainage ditch enters the Site on the north side of the property and flows from west to east, turning to the south for approximately 100 feet, and then turns east again and flows to the eastern corner of the Site. There it turns southward and parallels the eastern property line, exiting the Site on the southeast corner of the property. A review of historical maps and aerial photographs indicate the drainage ditch previously flowed diagonally across the Site and emptied into a former low-lying area located on the eastern portion of the property, now known as the former storage yard. Over the years, the drainage ditch was relocated at least seven times, eventually being relocated to its current position illustrated on Figure 1.2.

2.3 Previous Sewer Investigations

Supplemental Remedial Investigation (URS-October 2007)

URS completed a Supplemental Remedial Investigation (SRI) in October 2007. As part of the SRI, URS conducted an inspection of the storm sewer system at the Site. URS personnel inspected manholes, catch basins, and sewers with the assistance of the maintenance personnel at the Site. The purpose of this inventory and sampling was to evaluate the potential for floor drains and sewers to act as conduits for contaminant migration and assess the current conditions of the floor drains and sewers at the Site.

Twenty-six manholes and catch basins were located during the field inspection. Seventeen were able to be opened and were found to be free of any debris. Nine manholes and catch basins could not be opened during the inspection. Photographs were taken of each manhole, and field inspection forms were completed for each manhole that could be opened. The inspection forms included diagrams of the manhole with pipe inverts for inlets and outlets. The inspection did not include a video inspection of the sewer lines between each manhole or catch basin; therefore, the sewer lines themselves were not inspected, nor could the end point of the sewer pipe be verified. Sediment samples were collected during the investigation; results are discussed in URS' 2007 SRI report.

Supplemental Sewer Investigation (CRA-2008)

In 2008, Conestoga-Rovers & Associates (CRA) proposed sewer sampling and video inspection as part of the SSI. The purpose of the investigation activities was to verify previous investigation data, as well as to evaluate whether the Site's storm sewer system was a potential source area. According to the SSI WP, a physical survey of the storm sewer system, a video inspection, and a round of sediment sampling from select locations were proposed. Some components of the SSI WP were not completed, since sediments fully obstructed many of the sewer lines preventing completion of the inspection and sampling activities.

The SSI WP proposed the collection of a maximum of 22 sediment samples from various manholes/catch basins. Based on the physical condition of the catch basin and manhole locations, sediment samples were collected from 13 manholes/catch basins: CB-1, CB-10, CB-16, CB-18, CB-19, CB-2, CB-24, CB-25, CB-32, CB-5, CB-9, MH-C, and MH-D. All sediment samples collected were analyzed for Target Compound List (TCL) volatile organic compounds (VOCs) via USEPA Method SW 846-8260, and TCL semi-volatile organic compounds (SVOCs) via USEPA Method SW 846-8270 by TestAmerica-Pittsburgh. In addition, 11 samples were analyzed for polychlorinated biphenyls (PCBs) via USEPA Method SW 846-8082B.

The analytical data indicated the presence of low levels of VOCs, SVOCs (specifically benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, chrysene, and indeno(1,2,3-cd)pyrene) consistent with urban runoff from parking lots and roadways constructed of asphalt type paving materials), and PCB Aroclors 1254 and 1260. Although the draft Comprehensive Remedial Investigation Report compared the results of the sediment sampling to the 6NYCRR Part 375 Soil Cleanup Objectives for the Protection of Groundwater, the NYSDEC has asserted that comparison to sediment criteria as presented in the NYSDEC publication "Technical Guidance for Screening Contaminated Sediments", January 1999, would be more appropriate. As a result, the analysis for total organic carbon (TOC) was added for future sediment sampling and analysis activities.

First and Second Addendum to Supplemental Sewer Investigation (CRA-2011 and 2013)

In 2011 and 2013, CRA completed two investigations that were addendums to the SSI WP. During both investigations, CRA conducted cleaning of both the sanitary sewer and storm sewer utilizing high-pressure water jetting with a vacuum truck to collect the washwaters and sediments. Sediment was removed, to the extent practicable, from the up gradient pipelines downstream to the terminus of the storm sewer at the drainage ditch, located at the north end of Site. Following the cleaning, a camera was used to inspect the sewers for pipe condition, locate additional connections, and confirm connections between manholes and/or catch basins. At the conclusion of these investigations, it was confirmed that there were no interconnections between the sanitary sewer and storm sewer.

CRA had also conducted inspections of the Main Building including floor anomalies (e.g., discoloration, metal covers, and subsurface pits). The inspection found multiple discolored locations throughout the Main Building, including the identification of a previously unknown catch basin as well as a floor pit. When the catch basin was accessed, it was found to be filled with gravel. Connections with this catch basin were either packed with sediment or bulkheaded. Upon opening of the floor pit, there was no sediment present therefore no sediment sample was collected. Further inspection found no staining on the concrete from pre-existing machinery or chemical spills. This inspection concluded that these locations were not of concern.

In addition to cleaning the sanitary sewer and storm sewer systems and inspections of the Main Building, soil borings and groundwater monitoring wells were installed in areas based on previous inspection activities. These areas included historic paint rooms as well as maintenance areas where potential spills could have occurred. Soil and groundwater data was collected and analyzed. The data was found to be consistent with historical findings.

2.4 Fish and Wildlife Resource Impact Analysis (CRA-2010)

In 2010, CRA conducted a FWRIA at the request of the NYSDEC to assess potential impacts to the drainage ditch and off-Site receptors. The Scope of Work included the collection of sediment and surface water samples from the on-Site drainage ditch and off-Site receptors. Several sediment samples were collected from the length of the drainage ditch, both upstream and downstream of the storm sewer discharge points emanating from the eastern end of the main warehouse; the west end of the warehouse discharges into a buried storm sewer pipe that is located upstream of the drainage ditch. Based on the FWRIA, it was concluded that the Site itself did not pose a significant risk to ecological receptors due to its lack of natural habitats. In a report acceptance letter, the NYSDEC concurred provided measures were/are implemented to prevent future off-Site migration of Site-related contaminants to the drainage ditch and down gradient habitats.

Following the sewer cleaning activities, the NYSDEC expressed concern for the potential migration of PCB-impacted sediments from the storm sewers into the drainage ditch during the storm sewer cleaning activities. As a result, the NYSDEC requested that additional sediment samples be collected to verify that the cleaning activities had not adversely impacted conditions within the drainage ditch in accordance with its FWRIA acceptance letter.

2.5 Sanitary Sewer Pipe Repair (CRA-2012)

In 2012, CRA discovered a sanitary line break east of the former ARC building and contacted City of Batavia personnel. The City conducted a temporary repair, but were constrained due to the current condition of the ditch upstream and downstream of the repair, specifically the volume of sediment within the ditch. The damaged sanitary line rested above two metal culvert pipes, which were in poor condition and were estimated to be filled more than 50 percent with sediment. The deterioration of the culvert pipes had caused the sanitary line to shift and break, which allowed for sanitary waste to enter into the drainage ditch. The City removed the culvert pipes during the repair of the sanitary line. To facilitate the replacement of the culvert pipes, the City excavated sediment from the drainage ditch approximately 50 feet upstream and approximately 80 feet downstream of the sanitary line. Sediment removed from the drainage ditch was placed on the ground adjacent to the ditch.

3. Objectives

The objectives of this Third Addendum WP are to:

i) Collect two sediment samples from the drainage ditch downstream of storm sewer discharge points.

ii) Determine if concentrations of PCBs in drainage ditch sediments downstream of the storm sewer discharge points are consistent with concentrations of PCBs detected in sediments prior the 2011 sewer cleaning activities.

4. Scope of Work

The following Scope of Work has been developed to meet the objectives in Section 3.0 and was developed based on the March 2018 and February 2019 meeting with the NYSDEC.

4.1 Sediment Sample Collection

4.1.1 Drainage Sediment Sample Collection

Sediment samples will be collected from two locations in the drainage ditch that were sampled during the FWRIA investigation and documented in the final report submitted to the NYSDEC. These sample locations are identified as CRA-SW/SED-003 and CRA-SW/SED-004 on Figure 4.1. Sediment was sampled from location CRA-SW/SED-003 in 2008 and from location CRA-SW/SED-004 in 2008 and again in 2010. To ensure that the sediment samples are collected from the same locations as in 2008 and 2010, a hand-held global positioning system (GPS) unit will be used to identify the historical sampling locations in the field. One duplicate sample will also be collected. The purpose for selecting the two sample locations is to have a direct comparison between data collected in 2010 and data to be collected in 2019.

4.1.2 Sediment Sample Collection Method

Sediment sample collection will be conducted in the same manner as it was completed during the 2008 and 2010 sampling events.

Based on the anticipated shallow water levels at the proposed sample locations (less than 2 feet), the sediment samples will be collected for analysis using an Ekman dredge sampler and placed in new laboratory-supplied glass sampling jars. As per *DER-10 Technical Guidance for Site Investigation and Remediation (May 3, 2010)*, and as required by the NYSDEC and New York State Department of Health (NYSDOH), the samples will be collected from the 0 – 6 inches interval of the sediment column located in the approximate center of the ditch at the proposed locations.

Samples will be collected by using the method described below:

1. The sample location will be accessed. It is expected based on anticipated water levels in the ditch that access to the sample locations will occur by walking out into the ditch with rubber boots. Care will be taken not to disturb the areas near the sample locations (i.e., approach from downstream side of the sample locations). Sampling in the ditch will proceed from the downstream location to the upstream location (east to west) in order to minimize the impact of sampling activities on other sample locations.
2. At each location, an Ekman dredge sampler will be gently lower into the water to the sediment surface. A sample of sediment from the 0 – 6 inches interval (relative to the water-sediment surface) will be collected with the dredge sampler and placed into a new laboratory supplied 4-ounce (oz.) glass jar.
3. Excess water will be decanted carefully from the jar with every effort made to minimize the loss of any sediments. The sample jar will be closed using the laboratory-supplied cap.

If no sediment is retrieved after three attempts at a target location, the sampling location will be relocated within the immediate vicinity (i.e., within 5 feet) and additional attempts will be made to collect a sample.

The sediment will be placed into pre-cleaned, new, laboratory-supplied sample bottles. The sediment samples will be submitted to an environmental laboratory accreditation program (ELAP) certified laboratory for analysis of the following parameters.

- TOC will be analyzed via the USEPA Lloyd Kahn Method (the duplicate sample will not be analyzed for TOC)
- PCBs will be analyzed via USEPA Method 8082A

All samples will be collected in accordance with the Field Sampling Plan (FSP, 2008), Health and Safety Plan (HASP, 2016), and QAPP (2015) for the Site previously submitted to the Department. The laboratory will be required to provide a Category B deliverable. Due to the low number of samples being collected, quality assurance/quality control (QA/QC) samples will not be collected. All analytical data generated will be assessed and validated by a GHD Data Validator/Chemist per the QAPP and a Data Usability Summary Report (DUSR) will be generated.

4.2 PCB Sediment Assessment

Concentrations of PCBs detected in the sediment samples submitted for analysis will be compared with the concentrations reported in the FWRIA Report to determine if current concentrations are consistent with those detected prior to the 2011 sewer cleaning activities in the same area.

5. Schedule

The schedule for implementation of the Third SSI Addendum WP has been previously provided in the approved Master Schedule dated October 31, 2019. The schedule provides approximate periods for completion of the work beginning with the submittal of the Third SSI Addendum WP. The project schedule is subject to change, with the approval of the NYSDEC, and will be updated as needed. The sediment sampling event will be conducted in December 2019. The NYSDEC will be notified at least seven calendar days prior to the start of field activities. The raw, invalidated analytical data package from the sampling event will be provided to the NYSDEC within 2 weeks of data package delivery to GHD. It is anticipated that the draft letter report will be submitted to the NYSDEC in January 2020 for review.

6. Reporting

Following receipt and validation of the samples, a summary letter report will be prepared describing the work performed, sample locations, and an evaluation of the data relative to historical concentrations. The summary letter report, including the DUSR, will be submitted to the NYSDEC.

7. Health and Safety

A HASP has been prepared for the Site in accordance with 29 Code of Federal Regulations (CFR) Part 1910 and 29 CFR 1926 and has been reviewed and signed by a health and safety professional. The HASP specifies protective measures and procedures to be followed during the completion of field activities to minimize exposure of workers and the surrounding community to hazardous Site-related materials. The HASP is a separate Site-specific document and was previously submitted and approved by the NYSDEC on March 3, 2008. The HASP has been updated in 2016 to reflect more current information and safety-related policies/procedures and is reviewed annually. No changes to the document have occurred since the 2016 update.

8. Quality Management Plan

A QAPP has been prepared in accordance with the Resource Conservation and Recovery Act (RCRA) Quality Assurance Project Plan Guidance, NYSDEC, March 1991 and "EPA Guidance for Quality Assurance Project Plans", USEPA QA/G-5, USEPA/600/R-98/018, February 1998. The QAPP describes protocols necessary to achieve specified data quality objectives and is a separate Site-specific document. The QAPP was previously submitted and approved by the NYSDEC in 2015.

9. References

This section lists the references used to prepare this WP. Previous investigation documents that pertain to the Site are also listed.

CDM, October 1997. *O&K Trojan, Inc. Investigation Draft Report* (not accepted by NYSDEC)

CRA, July 2010. *Addendum to the Supplemental Sewer Investigation Work Plan* (048547-14)

CRA, November 2011. *Second Addendum to the Supplemental Sewer Investigation Work Plan* (048547-19)

CRA, November 21, 2012. Ex-Eaton Drainage Ditch-Options for Management of Impacted Materials (048547-Memo-11)

Ebasco Services Incorporated, July 25, 1996. *Final Site Inspection Prioritization*, Ex-Eaton Site, Batavia, Genesee County, New York (not accepted by NYSDEC)

New York State Department of Environmental Conservation, April 1995. *Division Technical and Administrative Guidance Memorandum: Determination of Soil Cleanup Objectives and Cleanup Levels*. HWR-94-4046

New York State Department of Environmental Conservation, May 3, 2010, *DER-10 Technical Guidance for Site Investigation and Remediation*

New York State Department of Environmental Conservation, January 1999. *Technical Guidance for Screening Contaminated Sediments*

New York State Department of Environmental Conservation, December 14, 2006, *6NYCRR Part 375, Environmental Remediation Programs Subparts 375-1 to 375-4 and 375-6*

NUS Environmental Corporation, September 1990. *Final Inspection Report.* Ex-Eaton Corporation/Construction Division, Batavia, New York

NUS Corporation, *Preliminary Assessment Report*

The Sear-Brown Group, June 2006. *Phase I Environmental Site Assessment* (not accepted by the NYSDEC)

United States Environmental Protection Agency, July 1996, *Remedial Site Assessment Decision*, Ex-Eaton Corporation Site, Batavia, Genesee County, New York

United States Environmental Protection Agency, 2005, *Contaminated Sediment Remediation Guidance for Hazardous Waste Site*

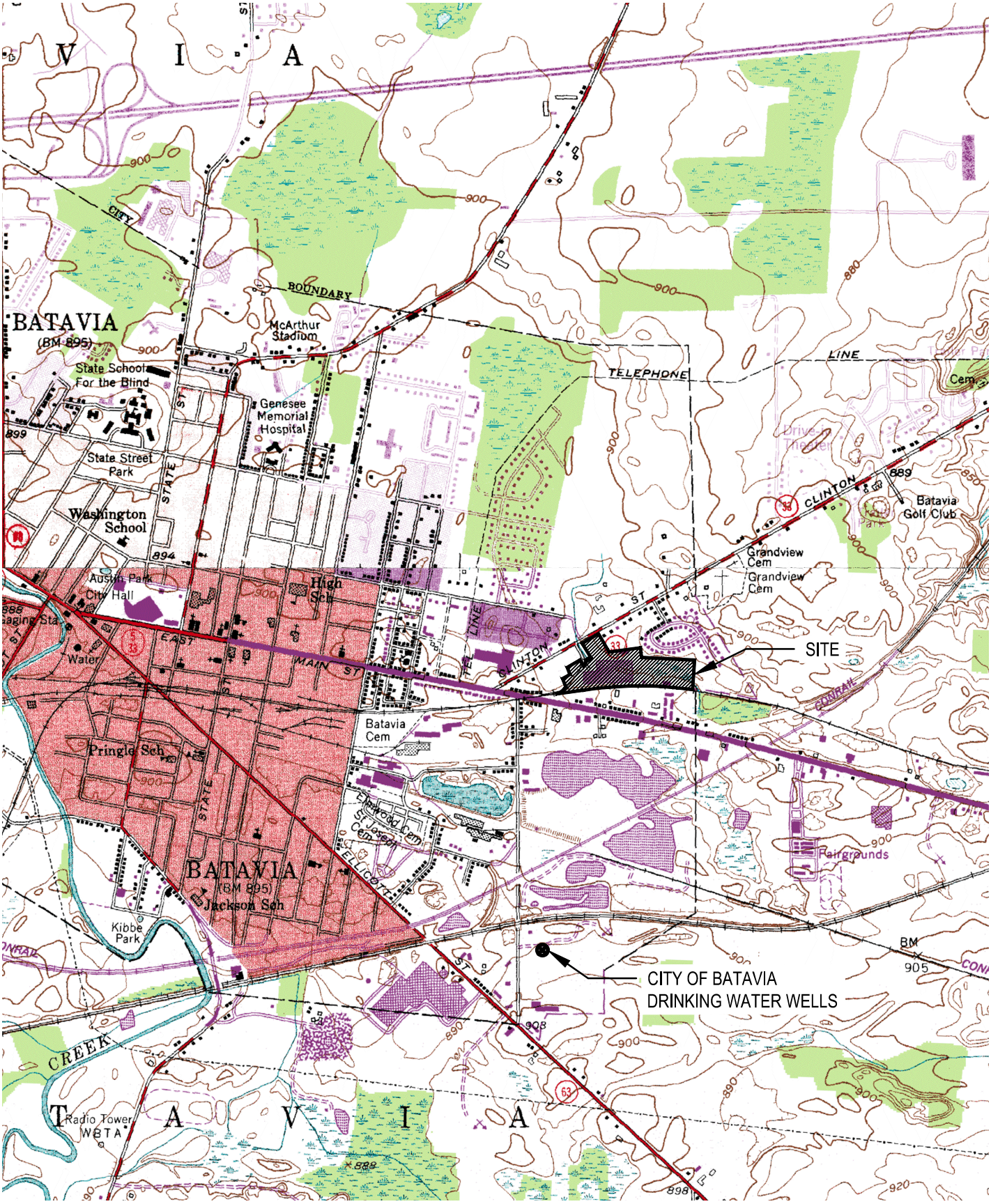
United States Geological Survey, 1950. *Photo revised 1978. 7½-Minute Series Topographic Map, Batavia South and Batavia North*

United States Geological Survey, 1984. *Geohydrology of the Glacial-Outwash Aquifer in the Batavia Area, Tonawanda Creek, Genesee County, New York*

URS Corporation, July 21, 2003. *Comprehensive Site Investigation Report*

URS Corporation, March 24, 2005. *Off-Site Investigation Report*

URS Corporation, October 31, 2007. *Supplemental Remedial Investigation Report* (not accepted by NYSDEC)



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0 2000'

GHD

EX-EATON SITE
34-40 CLINTON STREET
BATAVIA, NEW YORK

SITE LOCATION AND VICINITY MAP

Project No. **48547**
Report No. **026**
Date **SEP 2019**

FIGURE 1.1

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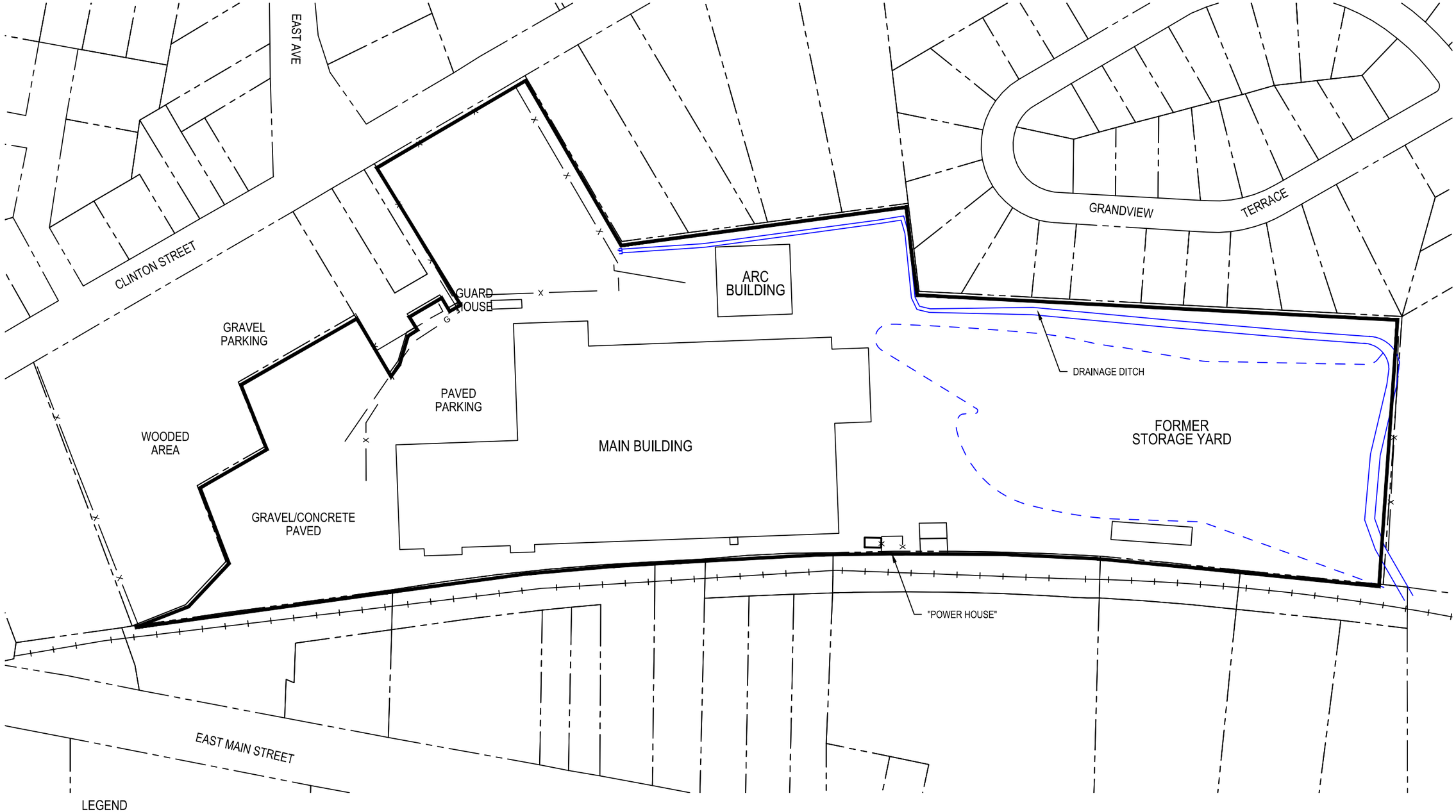

LEGEND

- FENCE LINE
- PROPERTY BOUNDARY
- DRAINAGE DITCH
- FORMER WETLAND BOUNDARY
- FORMER ERIE RAILROAD

N

0 160'

GHD

EX-EATON SITE
34-40 CLINTON STREET
BATAVIA, NEW YORK

SITE PLAN

Project No. **48547**
Report No. **026**
Date **SEP 2019**

FIGURE 1.2

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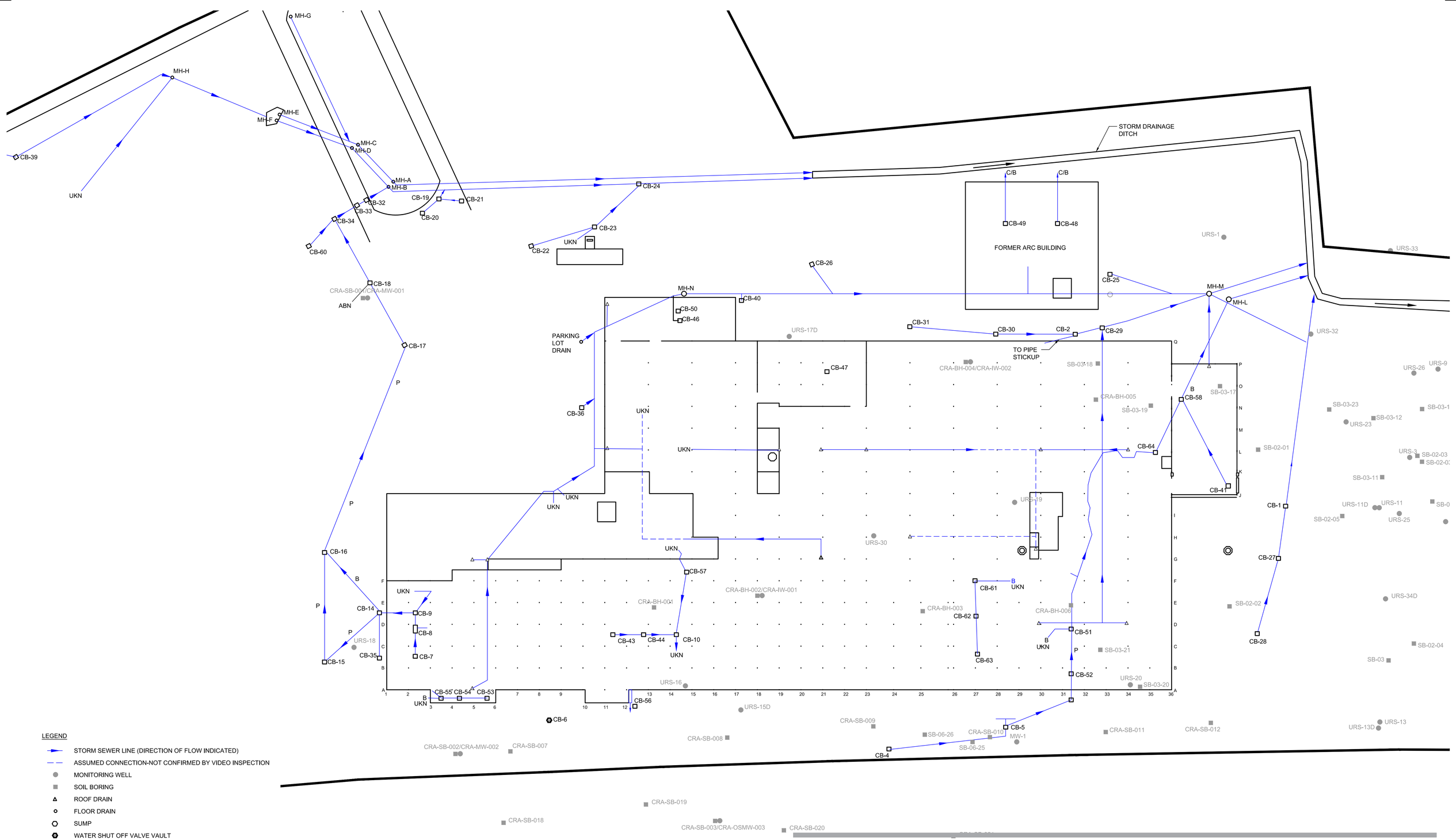

LEGEND

- STORM SEWER LINE (DIRECTION OF FLOW INDICATED)
- ASSUMED CONNECTION-NOT CONFIRMED BY VIDEO INSPECTION
- MONITORING WELL
- SOIL BORING
- ROOF DRAIN
- FLOOR DRAIN
- SUMP
- WATER SHUT OFF VALVE VAULT
- ELECTRICAL VAULT
- CLEAN OUT
- CATCH BASIN
- B BREAK IN SEWER LINE
- P PERFORATED PIPE
- PROPERTY BOUNDARY
- UKN TERMINUS UNKNOWN

N

0 20' 40' 80'

GHD

EX-EATON SITE
34-40 CLINTON STREET
BATAVIA, NEW YORK

STORM SEWER LAYOUT

Project No. **48547**
Report No. **026**
Date **SEP 2019**

FIGURE 1.3

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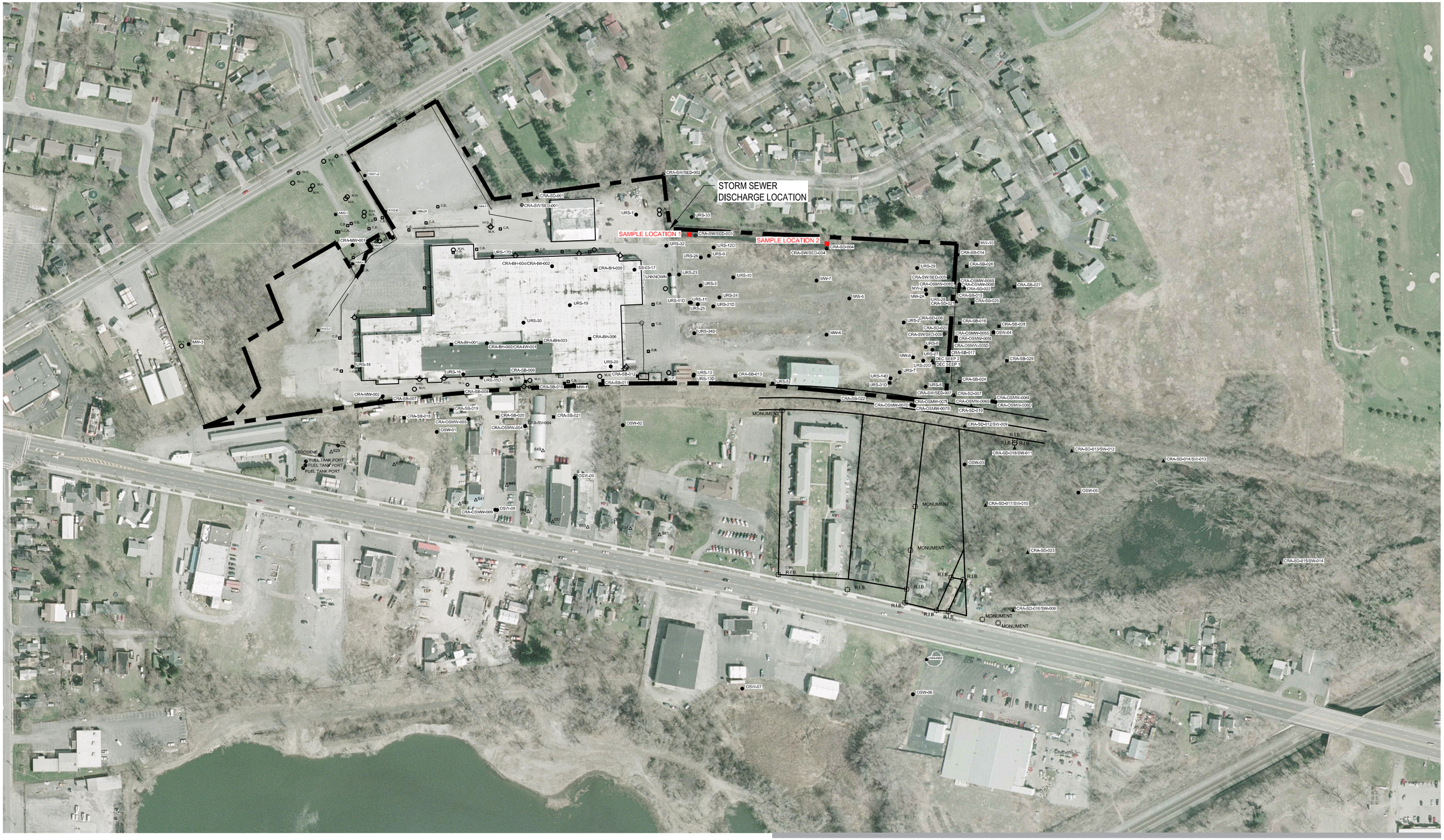

LEGEND:

- ▲ APRIL 2010
- ⊕ JULY 2008
- ■ 2019 PCB SAMPLING

N

0 160'

GHD

EX-EATON SITE
34-40 CLINTON STREET
BATAVIA, NEW YORK

2019 PCB SEDIMENT SAMPLE LOCATIONS

Project No. **48547**
Report No. **026**
Date **SEP 2019**

FIGURE 4.1

Filename: P:\Drawings\48000s\48547\48547-report\48547-00(026)\CADD\Drawings\Figures\48547 - FIGURE 4.1.dwg
Plot Date: 11 September 2019 - 8:45 AM

Source:

about GHD

GHD is one of the world's leading professional services companies operating in the global markets of water, energy and resources, environment, property and buildings, and transportation. We provide engineering, environmental, and construction services to private and public sector clients.

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