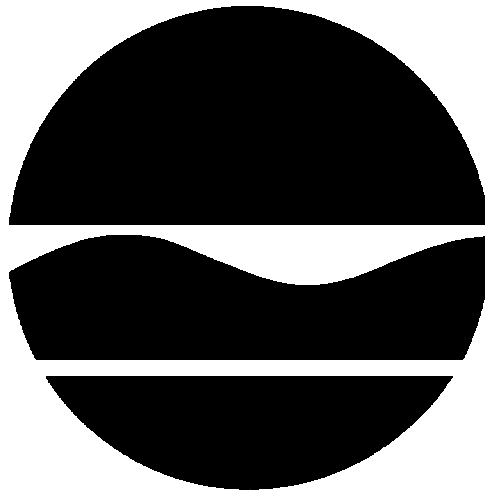


**PROPOSED REMEDIAL ACTION PLAN
FORMER FRINK AMERICA SITE**

**Environmental Restoration Project
Village of Clayton, Jefferson County, New York
Site No. E623013**

December 2009



Prepared by:

Division of Environmental Remediation
New York State Department of Environmental Conservation

FORMER FRINK AMERICA SITE
Town of Clayton, County of Jefferson, New York
Site No. E623013
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SECTION 1: SUMMARY AND PURPOSE OF THE PROPOSED PLAN

The New York State Department of Environmental Conservation (the Department), in consultation with the New York State Department of Health (NYSDOH), is proposing a remedy for the Former Frink America Site. The 1996 Clean Water/ Clean Air Bond Act provides funding to municipalities for the investigation and cleanup of brownfields.

As more fully described in Sections 3 and 5 of this document, operations at the Frink America Site resulted in the disposal of hazardous substances, including asbestos, solvents, petroleum, coal and coal ash residuals associated with the former use of the site.

During the course of the investigation certain actions, known as Interim Remedial Measures (IRMs), were undertaken at the former Frink America site in response to the contamination identified above. An IRM is conducted at a site when a source of contamination or exposure pathway can be effectively addressed before completion of the site investigation/remedial alternatives report (SI/RAR). The first IRMs undertaken at this site included removal of the on-site structures which contained asbestos and residual painting wastes. Removal of the structures also allowed access to subsurface soils contaminated with solvent wastes generated during the operation of the facility. Another IRM removed the subsurface tanks and waste associated with petroleum storage and painting operations. The final IRM also removed petroleum or solvent contaminated soils as well as residual coal and coal ash which was a waste product generated from the railyard that occupied the site prior to Frink America.

Based on the implementation of the above IRMs, the findings of the investigation of this site indicate that the site no longer poses a threat to human health or the environment therefore No Further Action is proposed as the remedy for this site.

The proposed remedy, discussed in detail in Section 6, is intended to attain the remediation goals identified for this site in Section 6. The remedy must conform with officially promulgated standards and criteria that are directly applicable or that are relevant and appropriate. The selection of a remedy must also take into consideration guidance, as appropriate. Standards, criteria and guidance are hereafter called SCGs.

This Proposed Remedial Action Plan (PRAP) identifies the preferred remedy and discusses the reasons for this preference. The Department will select a final remedy for the site only after careful consideration of all comments received during the public comment period.

The Department has issued this PRAP as a component of the Citizen Participation Plan developed pursuant to the New York State Environmental Conservation Law and Title 6 of the Official Compilation of Codes, Rules and Regulations of the State of New York (6 NYCRR) Part 375. This document is a summary of the information that can be found in greater detail in the March 2009 "Engineering Evaluation Report", and other relevant documents. The public is encouraged to review the project documents, which are available at the following repositories:

NYS DEC - Region 6 Headquarters
317 Washington Street
Watertown, NY 13601
(315) 785-2513
Office Hours 8:00AM - 4:45 PM
Project Manager: William Jesmore

Town Clerk's Office
Town of Clayton
405 Riverside Drive
Clayton, NY 13624
(315)686-3512 ext. 24
Office Hours 9AM - 4:00 PM
Town Clerk: Kathy LaClair

The Department seeks input from the community on all PRAPs. A public comment period has been set to begin on December 16, 2009 to provide an opportunity for public participation in the remedy selection process. A public meeting is scheduled for January 20, 2010 at the Clayton Village Offices at 405 Riverside Drive, in Clayton, from 6:00 pm until 8:00 pm.

At the meeting, the results of the investigation will be presented along with a summary of the proposed remedy. After the presentation, a question-and-answer period will be held, during which verbal or written comments may be submitted on the PRAP. Written comments may also be sent to Mr. Jesmore at the above address through February 1, 2010.

The Department may modify the proposed remedy or select another based on new information or public comments. Therefore, the public is encouraged to review and comment on all of the alternatives identified here.

Comments will be summarized and addressed in the responsiveness summary section of the Record of Decision (ROD). The ROD is the Department's final selection of the remedy for this site.

SECTION 2: SITE LOCATION AND DESCRIPTION

The Frink America site is located at the intersection of Webb Street and Riverside Drive in the Village of Clayton in Jefferson County, New York, as shown on Figure 1.

The site is 8.4 acres in size. The St. Lawrence River borders the site to the north and east along 1500 feet of shoreline. West of the site is the Village's business district, which includes a mix of commercial and retail operations. Private residences border the site to the south.

The site is relatively flat and the geology is characterized by a shallow horizon of overburden soils and fill material at a depth ranging from 2 to 12 feet. Below the soil is a relatively flat limestone bedrock surface which abruptly drops near the shore of the river.

Upon entering the ERP program in 2004, the site included six abandoned buildings occupying a total of approximately 80,860 square feet. The buildings were surrounded by former parking areas and roadways.

SECTION 3: SITE HISTORY

3.1: Operational/Disposal History

The historic industrial use of the site included a railyard, feed storage, lumber storage, ice house, bulk storage of petroleum, and coal storage facility. Several residential properties located along Franklin Street were purchased by Frink in the late 1970's and early 1980's to be used as office space, parking and a green space buffer to other residential properties. At least a portion of the property has been used for the manufacture of snow plows since the 1920's.

By 1919 a bus line was making daily trips from Clayton to Watertown. To keep the bus route open in winter, Mr. Carl A. Frink devised a plow to be mounted under a vehicle in front of the rear drive wheels to plow snow from the road. After several modifications and patents refining the technology, he began fabricating snow plows from raw steel at his Tire Repair shop in 1920. By 1929 he had relocated his shop to a small area of the current site. The operation continued to grow and eventually overtook the Railyard, Depot, Ice House, Coal-Feed-Lumber-Oil storage facilities, as well as several residential village parcels. By the 1980's the facility had grown to its largest extent and encompassed what is currently defined as the 8.4 acre site.

3.2: Remedial History

Several actions to investigate and remediate environmental concerns at the site have been pursued in the past. These actions are summarized by the following reports:

- Spill Fact Sheet Report and File: Spill # 9102918, reported June 13, 1991.
- Environmental Site Assessment Report, November 15, 1991
- Subsurface Investigation, June 1994
- Phase II Subsurface Investigation, July 2001
- Additional Investigation Work Plan, August 2001

This chain of reports begins with the report of petroleum contamination associated with several of Frink's petroleum storage tanks that were no longer in use and were removed while it was an active production facility in 1991. Some of the petroleum issues were completely remediated at the time of discovery, however several areas were inaccessible due to the presence of infrastructure. In these cases additional subsurface investigations were performed to define the areal and vertical extent of contamination and assess the need for additional work. During these work efforts additional areas of concern were identified that were not related to the on site petroleum storage.

In 2000, while the Department was negotiating remediation of these issues, the facility was sold to a company from Quebec who claimed the factory was not competitive and abruptly closed the facility. All responsible party efforts to investigate or remediate the site ceased.

The site was later acquired by the Town through foreclosure for non-payment of taxes. The Town applied to the Environmental Restoration Program in 2005.

SECTION 4: ENFORCEMENT STATUS

Potentially Responsible Parties (PRPs) are those who may be legally liable for contamination at a site. This may include past owners and operators, waste generators, and haulers.

There are currently no ongoing enforcement actions. However, legal action may be initiated at a future date by the state to recover state response costs should PRPs be identified. The Town of Clayton will assist the state in its efforts by providing all information to the state which identifies PRPs. The Town of Clayton will also not enter into any agreement regarding response costs without the approval of the Department.

SECTION 5: SITE CONTAMINATION

The Town of Clayton has recently completed a Remedial Investigation (RI). The report was prepared to document implementation of the complete remedial program and includes the necessary certifications for the remedial program to allow issuance of a certificate of completion. The findings of the RI are included in the Final Engineering Report (FER) prepared for the site.

5.1: Summary of the Remedial Investigation

The purpose of the RI was to define the nature and extent of any contamination resulting from previous activities at the site. The RI was conducted between February 2006 and February 2009. The field activities and findings of the investigation are described in the FER.

The tasks accomplished during the RI included assessing the property for soil and groundwater contamination. It was deemed necessary to remove the structures to facilitate the investigation which required an asbestos investigation and a subsequent abatement project. Following removal of the structures, additional sampling of remaining soils and groundwater further defined the limits of contamination and allowed for the development of interim remedial measures (IRMS). The investigation included the installation of seven (7) monitoring wells and the collection of soil samples

from one hundred fifty seven (157) surface and subsurface locations. Figure 2 illustrates the sampling locations that have been assessed as part of this ERP project as well as the locations of samples collected by other consultants, in the past, to support various other environmental assessments of this site. All of the historic data, depicted by “stars” on Figure 2, were used to guide the selection of sampling locations to characterize the entire site.

5.1.1: Standards, Criteria, and Guidance (SCGs)

To determine whether the soil and groundwater contains contamination at levels of concern, data from the investigation were compared to the following SCGs:

1. Groundwater, drinking water, and surface water standards, criteria and guidance (SCGs) are based on the Department’s “Ambient Water Quality Standards and Guidance Values” and Part 5 of the New York State Sanitary Code.
2. Soil cleanup objectives (SCOs) are based on 6NYCRR Part 375-6.8

Based on the RI results, in comparison to the Residential SCOs and potential public health and environmental exposure routes, certain media and areas of the site required remediation. These are summarized in Section 5.1.2. More complete information can be found in the FER report.

5.1.2: Nature and Extent of Contamination

This section describes the findings of the investigation for all environmental media that were investigated.

The snow plow fabrication process cut, welded, rolled, and painted raw steel. The contamination from this operation included metals, non-chlorinated solvents and petroleum. The solvents identified on-site included toluene and xylene. Incidental releases from the operation and filling of on-site fuel storage tanks and the previous bulk storage facility have been identified as the source of the petroleum contamination. The petroleum plume was co-mingled with the solvent plume.

Inorganic contaminants found above the residential SCOs included arsenic, barium, cadmium, chromium, copper, and lead. These elements may be attributable to natural deposits, coal storage, urban fill, painting operations for the finished snow plows or any combination of the above.

As described in the FER, many soil and groundwater samples were collected to characterize the nature and extent of contamination. As summarized in Tables 1 through 3, the main categories of contaminants that exceed their SCOs are volatile organic compounds (VOCs), semivolatile organic compounds (including PAHs), and inorganics (metals). For comparison purposes, where applicable, Residential SCOs are provided for each medium.

Chemical concentrations are reported in parts per billion (ppb) for water and parts per million (ppm) for soil.

The following are the media which were investigated and a summary of the findings of the investigation.

Waste Materials

Waste was found in areas of the building floor drains, sumps, and liquid storage tank bottoms. Contaminants of concern that were screened for PCBs, heavy metals, VOCs, and SVOCs. Waste identified during the RI was addressed during the IRMs by proper characterization, segregation, containerization, and off site disposal at an approved facility. The areas removed are further discussed in Section 5.2 and the March 2008 reports entitled *IRM Report - Asbestos Abatement and Building Demolition* and *IRM Report - Tank Removals*.

Surface Soil

Surface soil contamination identified during the RI was addressed during the IRM by the removal of areas of contamination identified on Figure 3, Table 2 and described in Section 5.2. The surface soils on approximately 1.3 acres were removed during the IRM.

Subsurface Soil

Subsurface soil contamination identified during the RI was addressed during the IRM by removal of areas of contamination identified through sampling efforts as shown on Figure 5, Table 1 and described in Section 5.2. Approximately 19,037 tons or 12,700 cubic yards of contaminated soil were excavated to depths ranging from 2 to 8 feet below the ground surface depending on bedrock depth and field screening indicators and disposed off-site as part of the IRM.

Groundwater

Groundwater contamination identified during the RI was addressed during the IRM by removal of areas of soil contamination identified through sampling efforts as shown on Figure 6, Table 3 and described in Section 5.2. Following the source removal IRM, the groundwater was monitored for contravention of the groundwater standards.

- Prior to the source removal action the concentration of xylene in groundwater was 3,000 ppb. Two rounds of post-IRM sampling in July and September 2009 have yielded no detections of VOCs.
- None of the post-IRM sampling events have detected SVOCs in the groundwater.
- Thallium and cadmium were detected in random wells during different sampling events only slightly above (6-10 ppb) the groundwater standard of 5 ppb. These detections which have not been consistently confirmed in any one monitoring well location are most likely the result of turbidity in the groundwater samples and are not considered a significant finding which requires ongoing site monitoring or additional remediation.
- Some other inorganic compounds (iron, magnesium, manganese, sodium, and aluminum) have been detected above class GA Groundwater Standards, however, these naturally occurring compounds and are not considered contaminants of concern for the site.

Surface Water

No site-related surface water contamination of concern was identified during the RI. Therefore, no remedial alternatives need to be evaluated for surface water.

Sediments

No site-related sediment contamination of concern was identified during the RI. Therefore, no remedial alternatives need to be evaluated for sediment.

Soil Vapor/Sub-Slab Vapor/Air

The potential for indoor air impacts was assessed by the collection of sub-slab soil gas samples from beneath the floor of the main manufacturing building. The structures were later removed as part of the IRM. Three sampling events were conducted, and although there were several detections of trichloroethene during the second sampling event, these detections were attributed to laboratory error as supported by the first and third sampling events. No site-related soil vapor of concern was identified during the RI. Therefore, no further remedial alternatives were evaluated for this medium.

5.2: Interim Remedial Measures

An interim remedial measure (IRM) is conducted at a site when a source of contamination or exposure pathway can be effectively addressed before completion of the RI/RAR, a number of IRMs were conducted at this site.

5.2.1: Building Demolition

Asbestos abatement and demolition of the buildings began in April 2005 and concluded in late 2007. The final building which was located at an uncontaminated portion of the property was removed in January 2009 as part of the demobilization effort. The asbestos abatement project and building demolition work have been described in greater detail in the March 2008 *IRM Report - Asbestos Abatement and Building Demolition*.

5.2.2: Tank Removals

In November 2005 a 4,000 gallon and 6,000 gallon underground petroleum storage tank and a 10,000 gallon above ground petroleum storage tank were removed. All of the tanks contained #2 Fuel Oil. The tanks were emptied, decontaminated, excavated and recycled at an approved off-site facility. Visible contamination was present at all three tank locations. The contaminated soils were removed during the source removal actions of 2007 and 2008. The tank removal operation was summarized in the *IRM Report - Tank Removals*, dated March 2008.

5.2.3: Source Removal Actions

Source removal actions were completed during the Fall of 2007, Summer of 2008 and Summer of 2009. These actions removed soils contaminated with petroleum, non-chlorinated solvents and metals with the intent of meeting the soil clean-up objectives. The contaminated soil was disposed at a permitted solid waste disposal facility. After the draft IRM report was issued in March of 2009, it was determined that a minor amount of additional soil removal would allow for the residential use of the site without additional use restrictions beyond those imposed by local ordinances. The Town and their consultant returned to the site in July of 2009 to remove three areas of soil contamination in the vicinity of SS-16 (due to chromium and lead exceedances) and SS-41 and SS-46 (due to SVOC exceedances). This work is summarized in the FER and the areas are shown on Figure 7.

In general, the residential SCOs were reached prior to backfilling an excavation area. The Residential SCOs for VOCs were reached at all locations. The residential SCOs for SVOCs and metals were met at all locations with the following exceptions:

- Cadmium exceeded the residential SCO at ten (10) of the one hundred six (106) post excavation soil cleanup verification locations. The SCG for cadmium is 2.5 ppm. Of the 10 exceeding, 9 ranged from 2.5 to 3.33 ppm. The tenth sample equaled 9.1 ppm. All of these locations were at depth and none represent a significant incidence of cadmium contamination warranting further remediation.
- The edge of the Area 1 excavation which extended into the intersection of Franklin and Hugunin Streets was halted prior to attaining the residential SCOs due to the proximity of an old, yet still active, sanitary sewer line. Figure 8 shows the area in question. The only exceedances at this location (FS-E1Y-SW15-A) were for barium at a concentration of 384 ppm (350 is the SCG) and chromium at 57.8 ppm (36 ppm is the SCG). Two adjacent verification samples had no exceedances attesting to the limited volume of soil contamination that remains at this off-site location.

- The only other inorganic exceedance was at the excavation limits at sample location FS-E2-NW-A along the northern edge of Area 2 where barium was detected at a concentration of 370 ppm, while the SCO was 350ppm. See Figure 8. Considering the four other post excavation verification samples taken in close proximity to this sample were below the SCO and the minimal magnitude of the exceedance, the barium detection does not represent a significant incidence of barium contamination warranting further remediation.
- The western edge of the Area 3 excavation also contained the sole exceedance for SVOCs in the post-excavation soil verification data. The sample was identified as FS-E3-BWWA and is shown on Figure 8. This area was historically used as a coal storage area prior to the Frink operation and the contaminant benzo (b) fluoranthene appears associated with this use. The detection was 3 ppm, which is 2 ppm over the SCG, which considering the four other post excavation verification samples taken in close proximity to the site of the exceedance does not represent a significant incidence of benzo(b) fluoranthene contamination warranting further remediation. This was the only SVOC exceedance in the post excavation verification sampling program which assessed 78 discrete sampling locations.

5.3: Summary of Human Exposure Pathways:

This section describes the types of human exposures that may present added health risks to persons at or around the site. A more detailed discussion of the human exposure pathways can be found in Section 5 of the FER report.

An exposure pathway describes the means by which an individual may be exposed to contaminants originating from a site. An exposure pathway has five elements: [1] a contaminant source, [2] contaminant release and transport mechanisms, [3] a point of exposure, [4] a route of exposure, and [5] a receptor population.

The source of contamination is the location where contaminants were released to the environment (any waste disposal area or point of discharge). Contaminant release and transport mechanisms carry contaminants from the source to a point where people may be exposed. The exposure point is a location where actual or potential human contact with a contaminated medium may occur. The route of exposure is the manner in which a contaminant actually enters or contacts the body (e.g., ingestion, inhalation, or direct contact). The receptor population is the people who are, or may be, exposed to contaminants at a point of exposure.

An exposure pathway is complete when all five elements of an exposure pathway exist. An exposure pathway is considered a potential pathway when one or more of the elements currently does not exist, but could in the future.

Contaminated surface and subsurface soil was removed so the pathway no longer exists for contact with soil contaminants. Drinking contaminated groundwater is not expected since public water serves the area and there are no known users of private drinking water wells nearby and the post-IRM groundwater has no exceedances of standards. In addition a local ordinance prohibits the use of groundwater within the Village as a source for potable water. The potential for people to breathe contaminated vapors associated with the site was evaluated and determined, based on sampling results, that they do not represent an exposure pathway.

5.4: Summary of Environmental Assessment

This section summarizes the assessment of existing and potential future environmental impacts presented by the site. Environmental impacts include existing and potential future exposure pathways to fish and wildlife receptors, as well as damage to natural resources such as aquifers and wetlands.

The IRMs have accomplished the remediation goals and satisfied the SCGs for the site eliminating any impacts to the groundwater and/or ecological resources.

SECTION 6: SUMMARY OF THE REMEDIATION GOALS, PROPOSED REMEDY, AND THE PROPOSED USE OF THE SITE

Goals for the remedial program have been established through the remedy selection process stated in 6 NYCRR Part 375. At a minimum, the remedy selected must eliminate or mitigate all significant threats to public health and/or the environment presented by the hazardous substances disposed at the site through the proper application of scientific and engineering principles.

Prior to the completion of the IRM described in Section 5.2, the remediation goals for this site were to eliminate or reduce to the extent practicable exposures of persons at or around the site to VOCs, SVOCs, and metals contamination in groundwater and soils.

The Department believes that the IRMs have accomplished the remediation goals and satisfied the SCOs for the site.

Based on the results of the investigations at the site, the IRMs that were performed, and the evaluation presented here, the Department is proposing No Further Action as the preferred alternative for the site. The Department believes that this alternative would be protective of human health and the environment and would satisfy all SCOs as described above. Overall protectiveness is achieved through meeting the remediation goals listed above.

Therefore, the Department concludes that No Further Action which allows for residential use with no restrictions is the proposed remedy for the site. The elements of the IRMs already completed are listed below:

1. Removal of all buildings and storage tanks, asbestos, and contamination associated with those structures.
2. Removal of all soil which exhibited contamination above the site specific soil clean-up objectives for residential use as defined in 6 NYCRR Part 375-6.8. The soil removal has also resulted in no exceedances of the groundwater standards attributable to site related contaminants.

The proposed future use for the Former Frink America Site is multi-family residential housing and light commercial use.

TABLE 1
Nature and Extent of Contamination in Sub-Surface Soils Before and After the IRM
 Sampling dates range from August 2005 - July 2009

Subsurface Soils Pre-IRM	Contaminants of Concern	Concentration Range Detected (ppm) ^a	SCG ^b (ppm) ^a	Frequency of Exceeding SCG
Volatile Organic Compounds (VOCs)	Benzene	ND -0.090	0.06	1 of 34
	Ethyl Benzene	ND - 390	1	1 of 34
	o,m,p-Xylene	ND - 6,600	0.260	4 of 34
	Methylene Chloride	ND - 0.5 ^c	0.050	5 of 34
Semivolatile Organic Compounds (SVOCs)	Benzo (a) anthracene	ND - 3	1	2 of 34
	Benzo (b) fluoranthene	ND-23	1	4 of 34
	Chrysene	ND - 21	1	4 of 34
	Indeno (1,2,3-cd) pyrene	ND - 0.8	0.5	1 of 34
Inorganic Compounds	Arsenic	ND - 68.8	16	3 of 34
	Barium	41 - 389	350	2 of 34
	Cadmium	ND - 12	2.5	23 of 34
	Chromium	6.3 - 120	36	8 of 34
	Copper	11 - 840	270	1 of 34
	Lead	ND - 1540	400	1 of 34

Subsurface Soils Post-IRM	Contaminants of Concern	Concentration Range Detected (ppm) ^a	SCG ^b (ppm) ^a	Frequency of Exceeding SCG
Volatile Organic Compounds (VOCs)	Benzene	ND	0.060	0 of 64
	Ethyl Benzene	ND-0.680	5.5	0 of 64
	o,m,p-Xylene	ND - 0.210	1.2	0 of 64
Semivolatile Organic Compounds (SVOCs)	Benzo (a) Anthracene	ND - 0.200	1	0 of 78
	Benzo (a) Pyrene	ND - 0.200	1	0 of 78
	Benzo (b) Fluoranthene	ND - 3	1	1 of 78
	Chrysene	ND - 0.200	3.9	0 of 78
Inorganic Compounds	Arsenic	ND - 8.19	16	0 of 69
	Barium	41 - 384	350	2 ^d of 69
	Cadmium	ND - 9.1	2.5	10 ^e of 106
	Chromium	ND - 57.8	36	1 ^d of 71
	Copper	4.25 - 110	270	0 of 69
	Lead	ND - 130	400	0 of 71

^a ppm = parts per million, which is equivalent to milligrams per kilogram, mg/kg, in soil;

- ^b SCG = standards, criteria, and guidance values; For groundwater the residential SCOs are Part 703 class GA groundwater standards, for soils the SCOs are obtained from 6 NYCRR Part 375-6 with a goal of achieving residential SCOs.
- ^c Methylene chloride is a common laboratory artifact. The detections were listed above for completeness of the data, however this is not considered a site contaminant.
- ^d The only sub-surface exceedance for chromium, and one of the two barium exceedances were at a location in the street where the excavation was halted due to the proximity of a 100 year old, yet still active, sanitary sewer line.
- ^e Nine of the ten exceedances ranged from 2.5 to 3.33 ppm. The tenth sample equaled 9.1 ppm.
- ND = Not Detected at the MDL
MDL = Method Detection Limit

TABLE 2
Nature and Extent of Contamination on Surface Soils Before and After the IRM
 Sampling dates range from August 2005 - January 2009

Surface Soil Pre-IRM	Contaminants of Concern	Concentration Range Detected (ppm) ^a	SCG ^b (ppm) ^a	Frequency of Exceeding SCG
Semivolatile Organic Compounds (SVOCs)	Benzo (a) anthracene	ND - 1.8	1	2 of 46
	Benzo (a) pyrene	ND -1.7	1	2 of 46
	Benzo (b) fluoranthene	ND-2.9	1 or MDL	4 of 46
	Benzo (k) Fluoranthene	ND-2.4	0.8	1 of 46
	Chrysene	ND-2.9	1	3 of 46
	Dibenzo (a,h) anthracene	ND - 0.36	.33 or MDL	1 of 46
	Indeno (1,2,3-cd) pyrene	ND-1.4	0.5	4 of 46
Inorganic Compounds	Barium	17.6 - 1370	350	2 of 40
	Cadmium	ND - 3.8	2.5	1 of 40
	Chromium	8.7 - 953	36	16 of 40
	Lead	4.9 - 2700	400	3 of 40
	Manganese	139 - 4150	2000	1 of 40
Volatile Organic Compounds (VOCs)	See Note #1			

Surface Soil Post-IRM	Contaminants of Concern	Concentration Range Detected (ppm) ^a	SCG ^b (ppm) ^a	Frequency of Exceeding SCG
SVOC and VOC	See Note #2			
Inorganic Compounds	Chromium	8.7 - 100 ^c	36	9 of 40 ^c

^a ppm = parts per million, which is equivalent to milligrams per kilogram, mg/kg, in soil;

^b SCG = standards, criteria, and guidance values: For groundwater the SCOs are Part 703 Class GA groundwater standards. For soils the SCOs were derived from 6 NYCRR Part 375-6 with a goal of achieving residential SCOs.

^c The 5 locations where chromium was detected above the SCOs were on residential properties that were purchased by Frink America during their last 10 years of operation. These parcels were only used as parking, storage of finished plows, office space, and a green-space buffer from other residential properties in the Village. Based on the historic use of these properties, it appears chromium was elevated in this area for reasons other than the industrial/commercial applications associated with the Site.

ND = Not Detected at the MDL

MDL = Method Detection Limit

Note #1: VOCs were also assessed in all 40 of the surface sample locations where inorganic contaminants were analyzed, however there were no violations of the SCOs.

Note #2: All areas that were identified with Surface Soil contamination were removed during the IRM and backfilled with clean fill. Therefore post IRM surface samples were not obtained. Rather the post IRM cleanup verification soil samples taken at depth and shown in Table 1 are indicative that SCOs have been met.

TABLE 3
Nature and Extent of Contamination in Groundwater Before and After the IRM
 Sampling dates range from August 2005 - January 2009

GROUNDWATER Pre-IRM	Contaminants of Concern	Concentration Range Detected (ppb)^a	SCG^b (ppb)^a	Frequency of Exceeding SCG
Volatile Organic Compounds (VOCs)	Xylene	ND - 3,000	5	2 of 6
	Toluene	ND - 5	5	1 of 6
Inorganic Compounds	Aluminum	ND - 1000	100	3 of 6
	Antimony	ND-15	3	1 of 6
	Iron	101 to 19,000	300 ^c	5 of 6
	Lead	ND - 32	25	1 of 6
	Magnesium	9,670 -41,300	35,000	2 of 6
	Manganese	ND - 3410	300 ^c	4 of 6
	Selenium	5.69 - 13.1	10	3 of 6
	Sodium	14,300 - 24,700	20,000	4 of 6
	Thallium	ND - 21.9	0.5 ^d	2 of 6

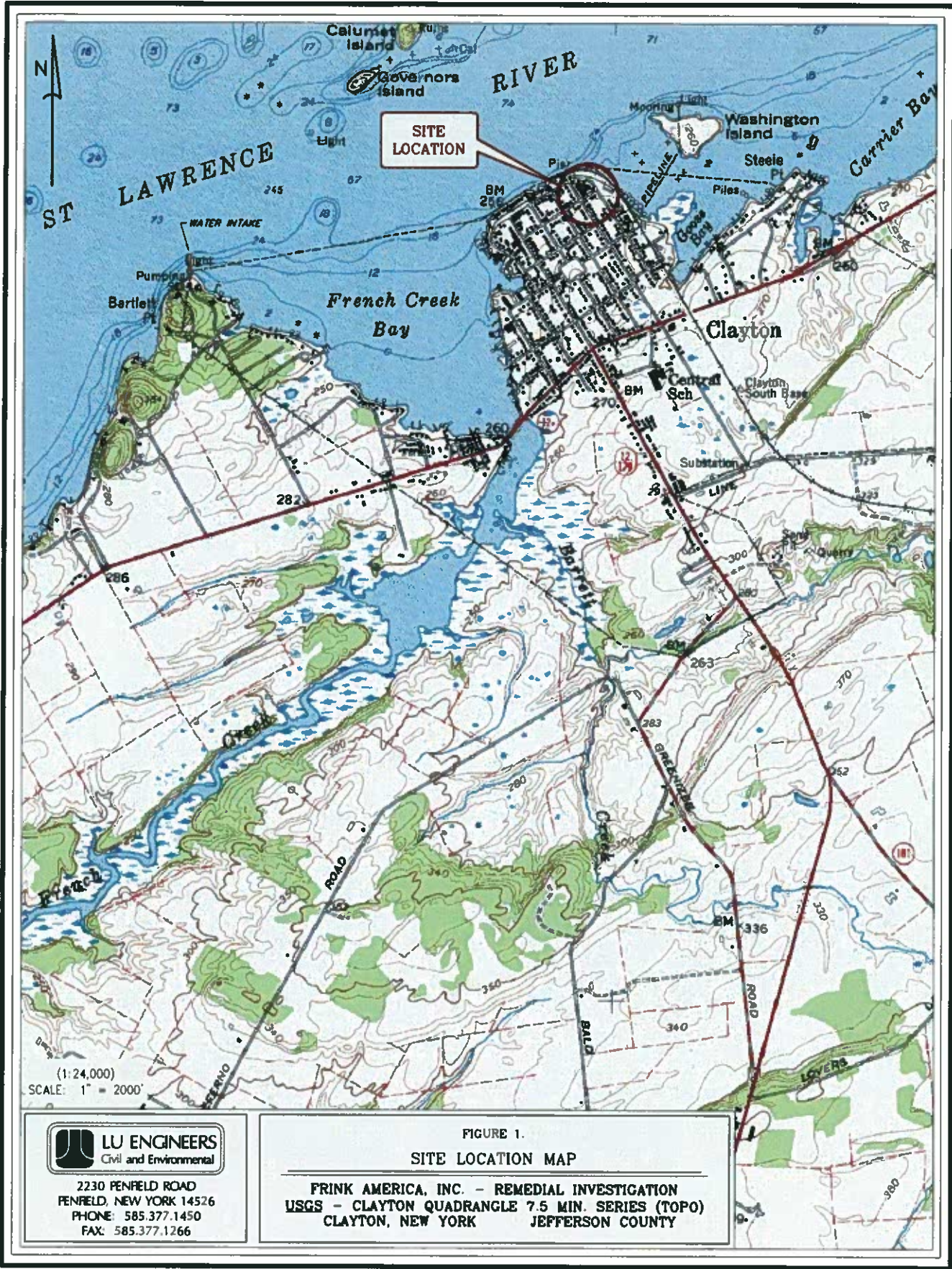
GROUNDWATER Post-IRM	Contaminants of Concern	Concentration Range Detected (ppb)^a	SCG^b (ppb)^a	Frequency of Exceeding SCG
Volatile Organic Compounds (VOCs)	February 2009 Xylene	ND - 15	5	1 of 6
	July 2009	ND	all	0 of 6
Inorganic Compounds February 2009	Aluminum	ND - 2240	100	5 of 6
	Antimony	ND	3	0 of 6
	Iron	164 - 17,700	300 ^c	5 of 6
	Lead	ND	25	0 of 6
	Magnesium	13,000 - 38,500	35,000	1 of 6
	Manganese	ND - 2190	300 ^c	4 of 6
	Selenium	ND	10	0 of 6
	Sodium	6,690 - 34,000	20,000	1 of 6
	Thallium	ND - 12.5	0.5	2 of 6

^a ppb = parts per billion, which is equivalent to micrograms per liter, ug/L, in water;

^b SCG = standards, criteria, and guidance values; For groundwater the SCOs are Part 703 Class GA groundwater standards, for soils the SCOs were derived from 6 NYCRR Part 375-6 with a goal of achieving residential SCOs.

^c The sum of iron and manganese must not exceed 500 in addition to the individual limits to meet the SCG imposed by Part 703 class GA groundwater standards.

ND = Not Detected at the MDL.
 MDL = Method Detection Limit



(1:24,000)
SCALE: 1" = 2000'



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FIGURE 1.
SITE LOCATION MAP

FRINK AMERICA, INC. - REMEDIAL INVESTIGATION
USGS - CLAYTON QUADRANGLE 7.5 MIN. SERIES (TOPO)
CLAYTON, NEW YORK JEFFERSON COUNTY

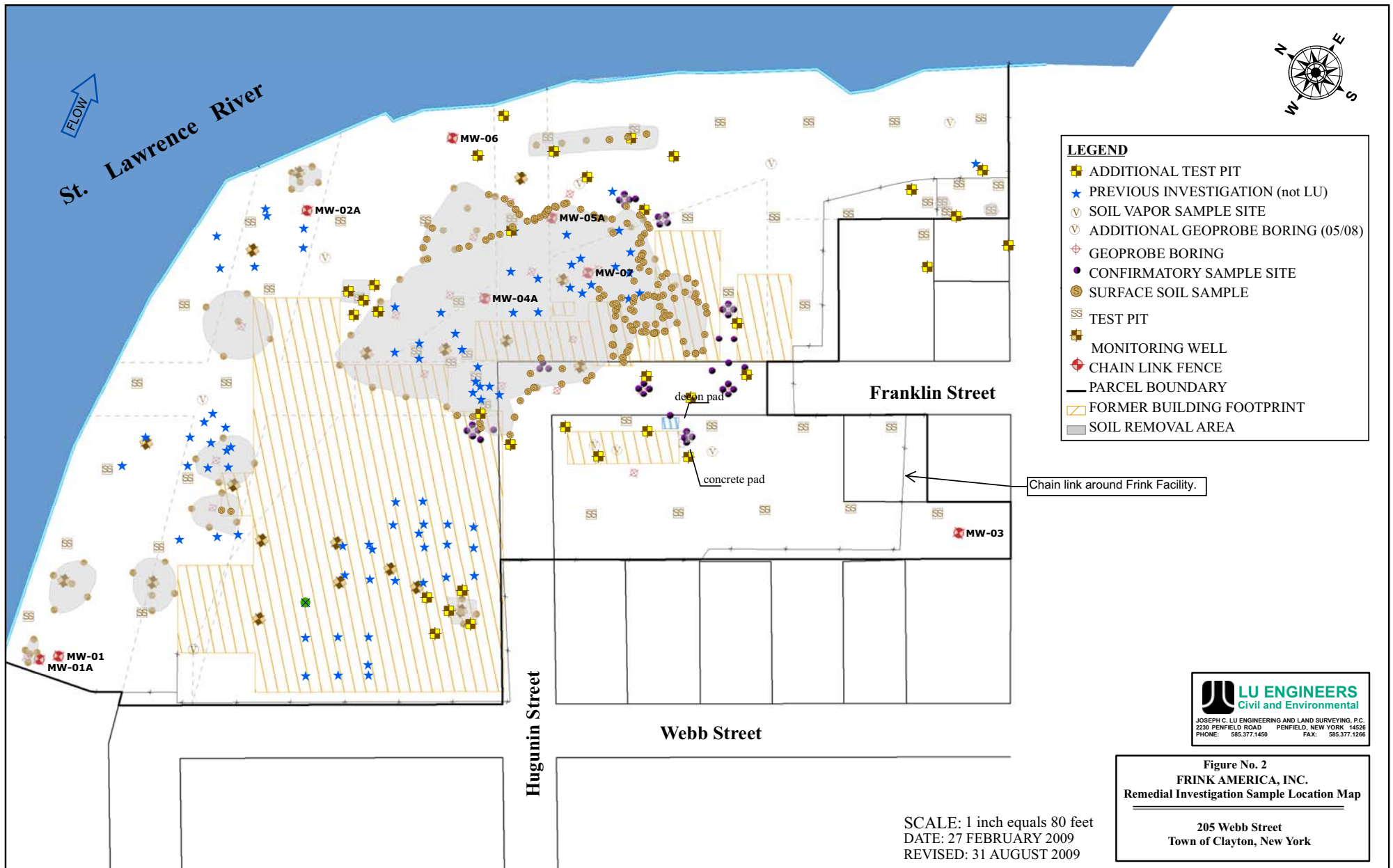
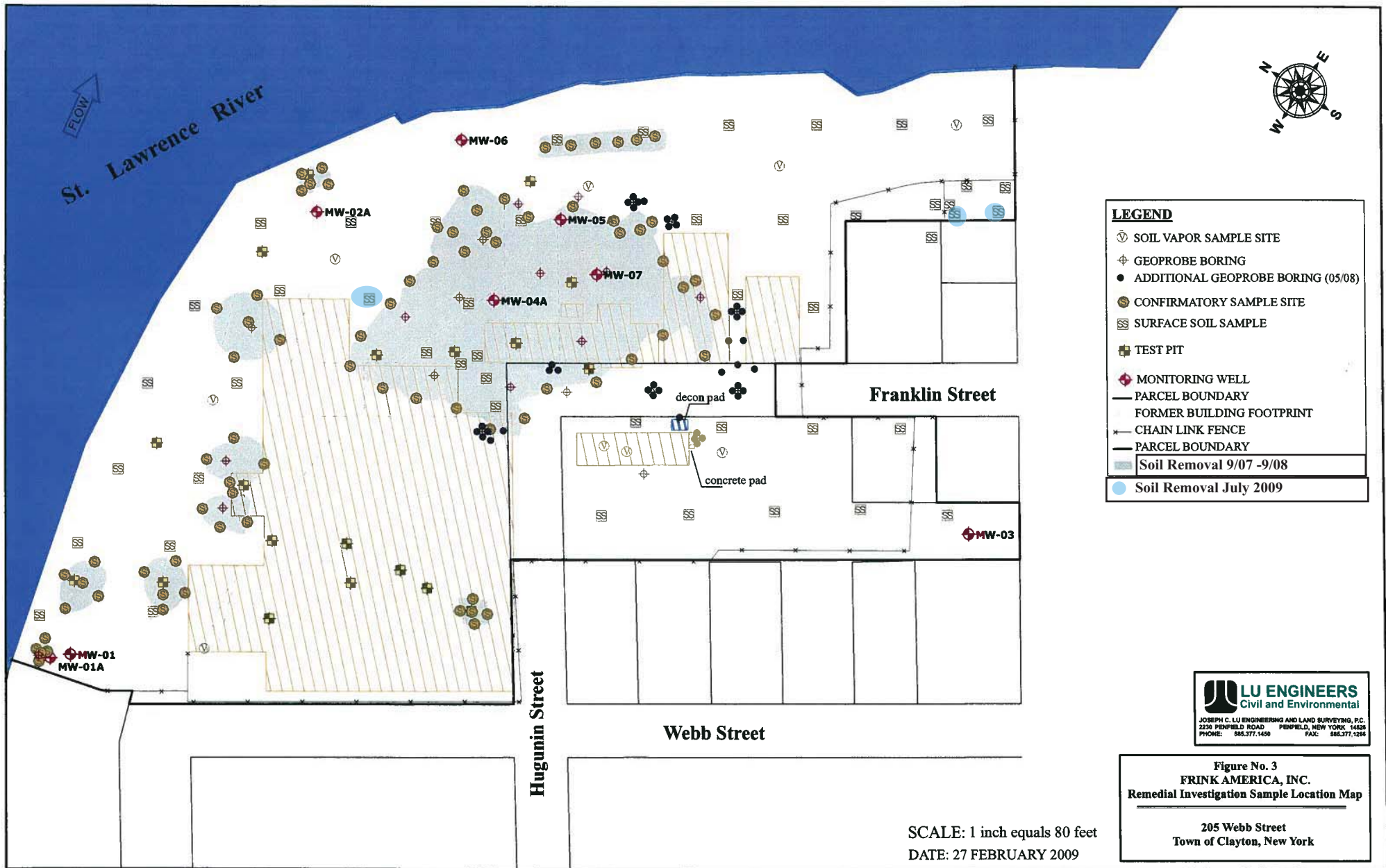


Figure No. 2
FRINK AMERICA, INC.
Remedial Investigation Sample Location Map

205 Webb Street
 Town of Clayton, New York



Locations representative of Chromium and Lead contamination generated at the site are illustrated by SS-16, SS-26, and SS-25. All of these areas were removed.

SS-16
Cr 174 (36)
Pb 450 (400)
removed 7/09

SS-26
Cr 953 (36)
Pb 2700(400)

SS-25
Cr 230 (36)
Pb 495 (400)

FS-E1R-SW35-A Silver 3.98 (2) SS-09 Cr 39 (36) SS-03 Cr 34 (36) SS-04 Cr 27 (36) SS-05 Cr 45 (36) SS-06 Cr 20 (36) SS-34 Cr 38 (36) SS-35 Cr 38 (36)

SS-12 Cr 33 (36)

SS-15 Cr 36 (36)

SS-08 Cr 16 (36)

SS-07 Cr 26 (36)

SS-33 Cr 40 (36)

SS-30 Cr 100 (36)

SS-39 Cr 35 (36)

SS-38 Cr 50 (36)

SS-32 Cr 28 (36)

SS-40 Cr 21 (36)

SS-31 Cr 37 (36)

SS-37 Cr 24 (36)

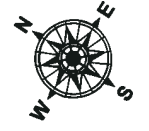
SS-36 Cr 17 (36)

Data Block Legend

SS-25 is a sample ID #

Cr 230 (36) Chromium was detected at 230 ppm, the SCG is 36ppm. **Bold Face Type** indicates the result violates the SCG.

Pb is the symbol for Lead.



LEGEND

- ⊕ SOIL VAPOR SAMPLE SITE
- ⊕ GEOPROBE BORING
- ADDITIONAL GEOPROBE BORING (05/08)
- CONFIRMATORY SAMPLE SITE
- ⊞ SURFACE SOIL SAMPLE
- ⊕ TEST PIT
- ◆ MONITORING WELL
- PARCEL BOUNDARY
- ▭ FORMER BUILDING FOOTPRINT
- CHAIN LINK FENCE
- PARCEL BOUNDARY
- ⊞ Soil Removal 9/07-9/08
- Soil Removal 7/2009
- ▭ Non industrial use properties.

Green shaded blocks were historically residential/light commercial. The properties were used as an ice house, storage, offices, and residences. Levels of Chromium were found to be above the SCGs, however appear to represent background concentrations.

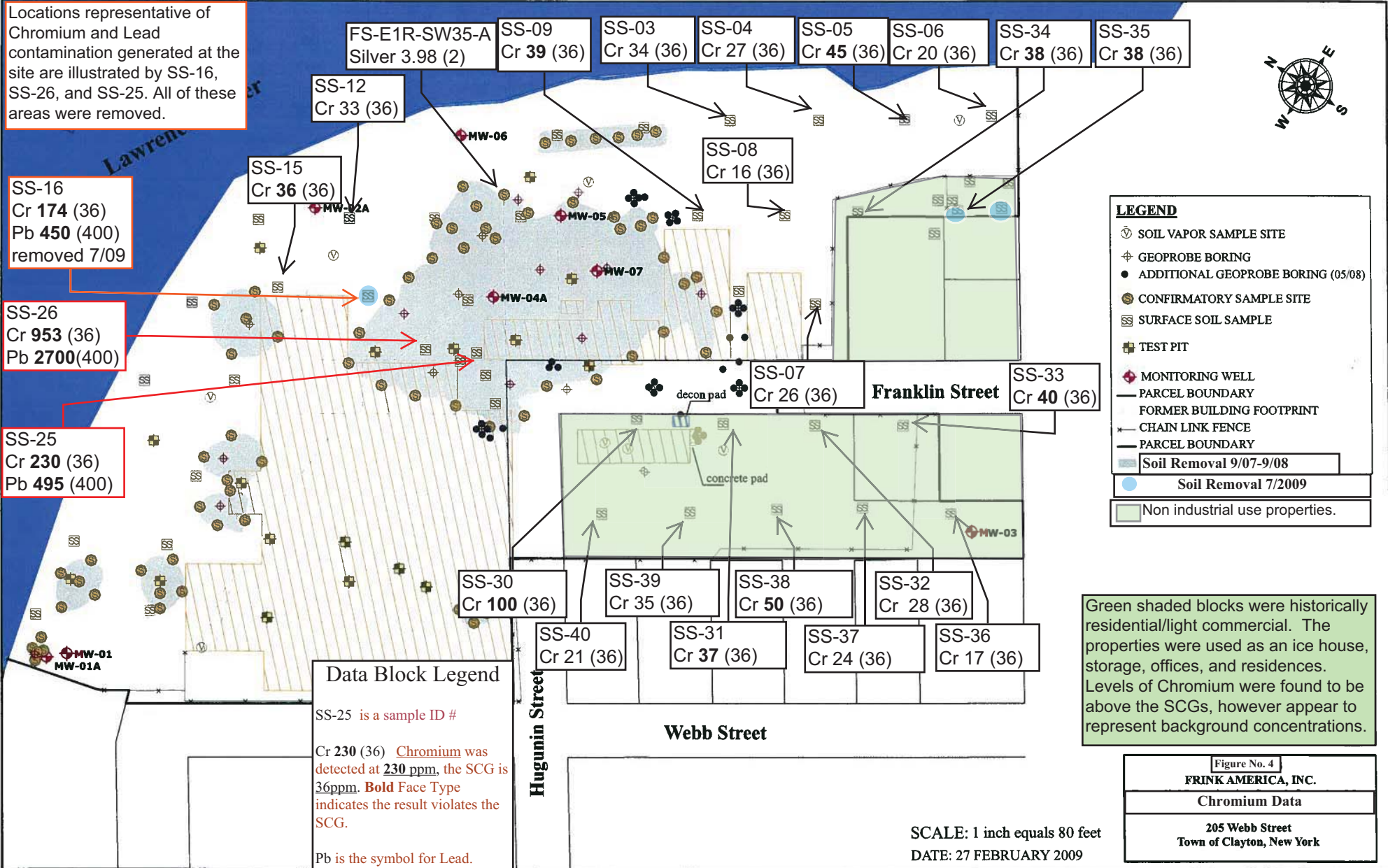
Figure No. 4

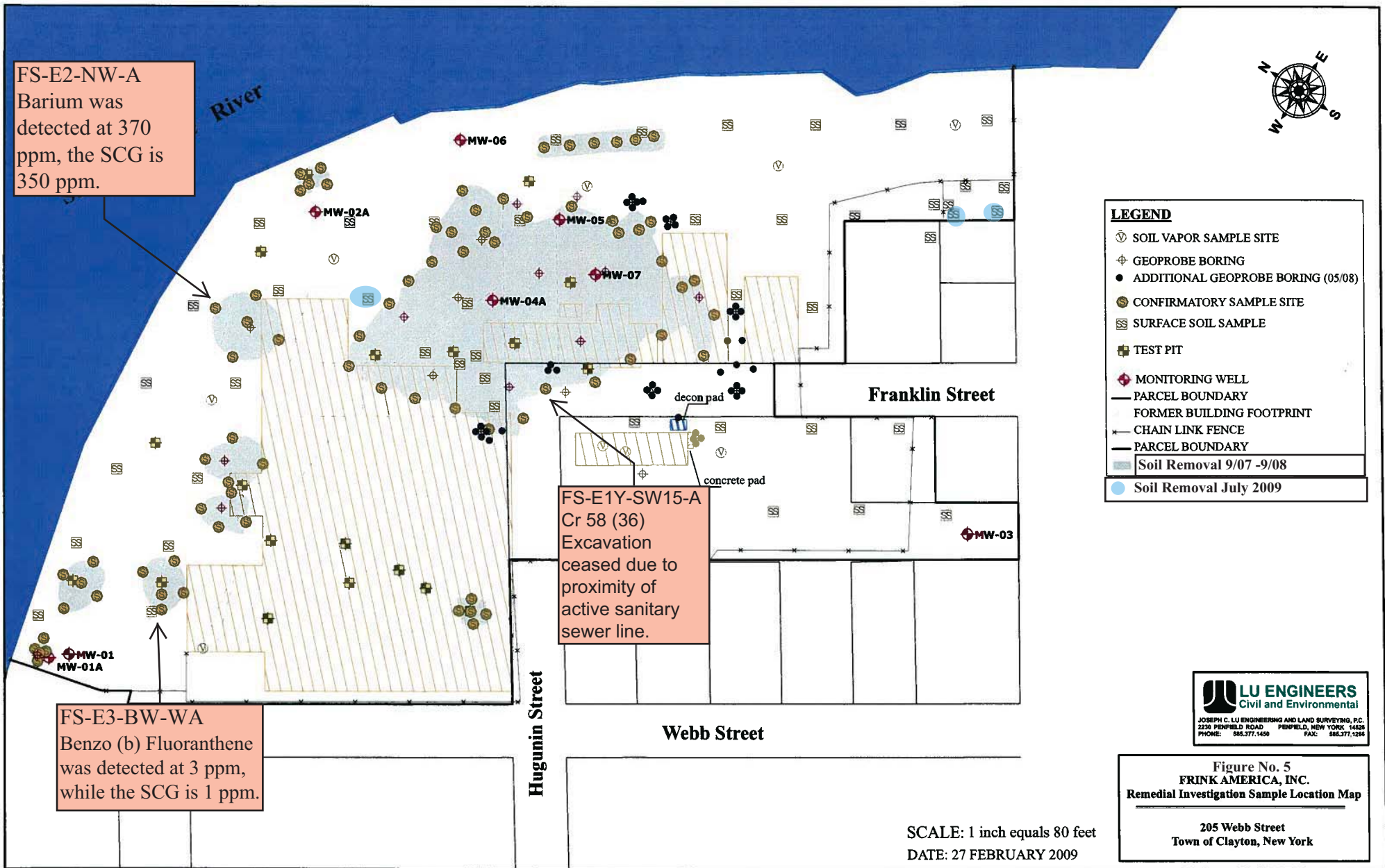
FRINK AMERICA, INC.

Chromium Data

205 Webb Street
Town of Clayton, New York

SCALE: 1 inch equals 80 feet
DATE: 27 FEBRUARY 2009





LEGEND

- ⊕ SOIL VAPOR SAMPLE SITE
- ⊕ GEOPROBE BORING
- ADDITIONAL GEOPROBE BORING (05/08)
- CONFIRMATORY SAMPLE SITE
- ⊞ SURFACE SOIL SAMPLE
- ⊕ TEST PIT
- ◆ MONITORING WELL
- PARCEL BOUNDARY
- ▭ FORMER BUILDING FOOTPRINT
- CHAIN LINK FENCE
- ▭ PARCEL BOUNDARY
- ▭ Soil Removal 9/07 -9/08
- Soil Removal July 2009

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Figure No. 5
FRINK AMERICA, INC.
 Remedial Investigation Sample Location Map

205 Webb Street
 Town of Clayton, New York

SCALE: 1 inch equals 80 feet
 DATE: 27 FEBRUARY 2009