New York State Department of Environmental Conservation
Division of Environmental Remediation
Remedial Bureau C, 11th Floor
625 Broadway, Albany, New York 12233-7014
Phone: (518) 402-9662 • FAX: (518) 402-9679
Website: www.dec.ny.gov

Alexander B. Grannis
Commissioner

February 20, 2009

Steven P. Byszewski, PE
Managing Principal
SESI Consulting Engineers
12-A Maple Avenue
Pine Brook, NJ 07058

RE: **Concord Hotel and Resort, Site ID No. C353008**
Kiamesha Lake, Sullivan County
Remedial Action Work Plan

Dear Mr. Byszewski:

The New York State Department of Environmental Conservation (Department) and New York State Department of Health (NYSDOH) have reviewed the draft Remedial Action Work Plan (RAWP), dated October 3, 2008. Comments are provided below:

1) Page 2, Last Paragraph: Please include a discussion of the thickness and depth of the NAPL plume.

2) Page 3, Summary of Remedy, Bullet 1: While the Department agrees that the goal of the track 4 cleanup will be to remove grossly contaminated soil, reasonable efforts should be taken to achieve commercial SCOs at the limits of the excavation. Final limits of excavation will be determined in consultation with the Department.

3) Page 3, Summary of Remedy, Bullet 3: Please clarify "free-phase product recovery" (e.g., active recovery). It is the Department's preference that active recovery of free product be conducted for a limited time, at a minimum, in an attempt to recover a majority of the free product.

4) Page 4, Item 4: After "...proper management of residual contamination..." insert, "in the form of an approved Site Management Plan (SMP)".

5) Page 4: Please add an item #5 indicating that the use of groundwater without proper treatment will be restricted.

6) Page 4: Please add item #6 indicating that a Site Management Plan will be developed that will include a periodic review element to ensure the remedy and any institutional/engineering controls remain in place.

7) Page 14, Samples Collected Outside Known AOCs: Please include a discussion in this section indicating that while some of the reporting limits were higher than the Track 1 SCOs, they were still below the Commercial SCOs that will be utilized for site remediation.

8) Page 14, Section 2.4.4, On-Site and Off-Site Groundwater Contamination: This section states that free-phase product was observed in MW-7 and subsequently "fingerprinted" as "tar substance", however, evidence of the free phase product is not recorded in the associated boring log. Please confirm that the boring log was recorded correctly.

8) Pages 14 & 15, Section 2.4.4, On-Site and Off-Site Groundwater Contamination: Include additional discussion regarding the details of the NAPL plume (e.g., depth, encountered, thickness, color, odors, PID readings) along with photos.

9) Page 15, Section 2.4.5, On-Site and Off-Site Soil Vapor Contamination: Figure 10 is missing from the document.

10) Page 17, Section 3.1, Evaluation of Remedial Alternatives: See comment #2.

11) Page 18, Section 3.1, Protection of human health and the environment: Delete the last sentence in this section. This section should indicate that all cleanup tracks (proposed remedies) would be protective of human health and the environment . However, a Track 1 cleanup would be marginally more protective than a Track 4 cleanup due to the fact that under a Track 1 remedy, impacted soil would be sent off-site for proper disposal.

12) Page 18, Section 3.1, Compliance with standards, criteria, and guidelines (SCGs): All cleanup tracks would achieve applicable cleanup standards.

13) Page 20: The bulleted Remedial Action standards should include a reference to TAGM 4046.

14) Page 21, Section 3.1, Summary of Selected Remedial Actions: See comment #2.

15) Page 26, Section 4.1.8, Community Participation Plan: Add "Attn: Mike Knipfing" to the Departments's Region 3 address.

16) Table 5, Soil Vapor Data: Figure 10, which shows the location of VWOU1-6, was not included in the RAWP. As the presence of VOCs at this location may have the potential to impact future structures, following review of Figure 10 the Department in consultation with the NYSDOH may require modification of the selected remedy to mitigate potential impacts.

17) Table 6, Cleanup Objectives: As a Track 4 cleanup with restrictions to commercial use is proposed for OU-1A, Table 6 should reflect the commercial SCOs as presented in 6 NYCRR Part 375-6.8(b). Since the propose remedy satisfies the requirements of 6 NYCRR Part 375-6.5(a), the protection of groundwater cleanup objectives are not applicable for this OU.

18) Figure 9: Remove the comparison to TAGM 4046 from this figure. Groundwater results should only be compared to TOGS 1.1.1.

Please note that all confirmatory/documentation sampling is required to be analyzed by an ELAP/NELAC certified laboratory.

If you have any questions concerning the above, please feel free to contact me at (518)-402-9564.

Sincerely,

James E. Candiloro, P.E.
Project Engineer
Remedial Bureau C
Division of Environmental Remediation

cc: J. Appicella
L. Shaw

ec: R. Schick
M. Ryan
E. Moore
J. Candiloro
R. Rusinko
F. Navratil - DOH

CONCORD HOTEL AND RESORT

SULLIVAN COUNTY, NEW YORK

Remedial Action Work Plan

Operable Unit 1A Main Hotel Area

NYSDEC BCP Number: C353008

Prepared for:

CONCORD ASSOCIATES
115 STEVENS AVENUE
VALHALLA, NEW YORK 10595

Prepared by:

SESI CONSULTING ENGINEERS, PC
12A MAPLE AVENUE, PINE BROOK, NJ 07058
Ph: (973) 808 - 9050

OCTOBER 2008
(REVISED MARCH 2009)

CERTIFICATIONS

I, ___Michael St. Pierre____________________, am currently a registered professional engineer licensed by the State of New York. I have primary direct responsibility for implementation of the remedial program for the Concord Hotel and Resort Site (NYSDEC BCA Index No. W3-1004-04-06 Site No. C353008).

I certify that the Site description presented in this RAWP is identical to the Site descriptions presented in the Brownfield Cleanup Agreement for Concord Hotel and Resort and related amendments.

I certify that this plan includes proposed use restrictions, Institutional Controls, Engineering Controls, and plans for all operation and maintenance requirements applicable to the Site and provision for development of an Environmental Easement to be created and recorded pursuant ECL 71-3605. This RAWP requires that all affected local governments, as defined in ECL 71-3603, will be notified that such Easement has been recorded. This RAWP requires that a Site Management Plan must be submitted by the Applicant for the continual and proper operation, maintenance, and monitoring of all Engineering Controls employed at the Site, including the proper maintenance of all remaining monitoring wells, for approval by the Department.

I certify that this RAWP has a plan for transport and disposal of all soil, fill, fluids and other material removed from the property under this Plan, and that all transport and disposal will be performed in accordance with all local, State and Federal laws and requirements. All exported material will be taken to facilities licensed to accept this material in full compliance with all Federal, State and local laws.

I certify that this RAWP has a plan for import of all soils and other material from off-Site and that all activities of this type will be in accordance with all local, State and Federal laws and requirements.

I certify that that this RAWP has a plan for nuisance control during the remediation and all invasive development work, including a dust, odor and vector suppression plan and that such plan is sufficient to control dust, odors and vectors and will prevent nuisances from occurring.

I certify that all information and statements in this certification are true. I understand that a false statement made herein is punishable as Class "A" misdemeanor, pursuant to Section 210.45 of the Penal Law.

080271

NYS Professional Engineer # Date Signature

It is a violation of Article 130 of New York State Education Law for any person to alter this document in any way without the express written verification of adoption by any New York State licensed engineer in accordance with Section 7209(2), Article 130, New York State Education Law.

FINAL REMEDIAL ACTION WORK PLAN

TABLE OF CONTENTS

LIST OF TABLES

LIST OF FIGURES

LIST OF APPENDICES

LIST OF ACRONYMS

Acronym	Definition
AOC	Area of Concern
AST	Aboveground Storage Tank
BCA	Brownfield Cleanup Agreement
BCP	Brownfield Cleanup Program
bgs	Below ground surface
CAMP	Community Air Monitoring Plan
C&D	Construction & Demolition Materials
COC	Contaminant of Concern
COPEC	Constituents of Potential Ecological Concern
cy	Cubic yard
DER	Division of Environmental Remediation
DER-10	NYSDEC Technical Guidance for Site Investigation & Remediation
DUSR	Data Usability Summary Report
ECs	Engineering Controls
ECL	Environmental Conservation Law
ESA	Environmental Site Assessment
FER	Final Engineering Report
FWRIA	Fish and Wildlife Resources Impact Analysis
gpm	gallons per minute
HHEA	Human Health Exposure Assessment
ICs	Institutional Controls
MW	Monitoring Well
NYSDEC	New York State Department of Environmental Conservation

Acronym	Definition
PCB	Polychlorinated Biphenyls
PID	Photoionization Detector
ppm	parts per million
QAPP	Quality Assurance Project Plan
RA	Remedial Action
RASR	Remedial Action Selection Report
RAWP	Remedial Action Work Plan
RCRA	Resource Conservation and Recovery Act
RDD	Remedial Design Document
RI	Remedial Investigation
RIR	Remedial Investigation Report
RIWP	Remedial Investigation Work Plan
SCG	Standards, Criteria, and Guidance
SCO	Soil Cleanup Objectives
SESI	SESI Consulting Engineers, PC
SMP	Site Management Plan
SSDS	Sub-Slab Depressurization System
SVOCs	Semi-Volatile Organic Compounds
S&W	S&W Redevelopment of North America, LLC.
TAGM	Technical and Administrative Guidance Memorandum
TAL	Target Analyte List
TOGS	Technical and Operations Guidance Series
USEPA	United States Environmental Protection Agency
UST	Underground Storage Tank
VOCs	Volatile Organic Compounds

EXECUTIVE SUMMARY

Site Description/Physical Setting/Site History

Concord Associates, LP entered into a Brownfield Cleanup Agreement (BCA) with the New York State Department of Environmental Conservation (NYSDEC) on May 19, 2005, to investigate and remediate approximately 14.5-acres of the 1,700 acre Concord Hotel Site located in the Town of Thompson, Sullivan County New York. Concord Associates, LP is a Volunteer in the Brownfield Cleanup Program (NYSDEC BCA Index # W3-1004-04-06 and Site # C353008). The 14.5 acres associated with BCA have been divided into five operable units (OU-1A, OU-1B, OU-1C, OU-2 and OU-3) and are part of a larger redevelopment effort. The redevelopment activities include demolition of old structures and construction of new buildings and facilities that are associated with the planned Concord Hotel and Resort project. This Remedial Action Work Plan (RAWP) is solely related to OU-1A, known as the Main Hotel Area (hereinafter "Site"). This RAWP summarizes the nature and extent of contamination as determined from data gathered during the Remedial Investigation (RI), performed between August and September 2008 in OU-1A.

The Site is about 2-acres in area and is in a rural setting. The Site is bounded by Kiamesha Lake Road to the north, an area of former/proposed hotel and resort features (referred to as Brownfield Site Expansion Area (BSEA) pending BCP application approval as BCP Site No. 353012) to the south and west, and Concord Road to the east. The Site is situated on a local topographical high point (a ridge trending approximately northeasterly - southwesterly) and the ground surface slopes towards Kiamesha Lake located about 2,000 feet to the west and towards Kiamesha Creek located about 2,750 feet to the east. The Site has been impacted by historical operations associated with the former Hotel and Resort (primarily from discharges associated with USTs and suspected improper waste handling practices) since the site was abandoned for many years.

The Site is located within the Appalachian Plateau physiographic province. Overburden soil is sand with varying amounts of silt and gravel, underlain by weathered shale/sandstone bedrock. Bedrock is primarily middle to late Devonian shale/sandstone, and is encountered in OU-1A at depths ranging from five (5) to 25 feet below ground surface. Groundwater was encountered within OU-1A at a depth of about 5 feet below ground surface (bgs) within wells installed in former basements and at depths of about 27 bgs elsewhere. The Site appears to be located on a hydraulic divide that coincides with the local topographical high (a ridgeline trending northeasterly-southwesterly). Groundwater flow direction appears to follow the local topography, towards Kiamesha Lake on the northwesterly side of the ridgeline and towards the Kiamesha Creek on the southeasterly side of the ridgeline.

Summary of the Remedial Investigation

The Remedial Investigation (RI) for OU-1A was completed in accordance with the Remedial Investigation Work Plan (RIWP) for the Concord Hotel and Resort, last revised July 24, 2008, and subsequently approved by NYSDEC on August 8, 2008. The RI was completed in the vicinity of three (3) areas of concern (AOC) identified in the RIWP, and supplemental site characterization throughout the OU was conducted per the request of the NYSDEC.

AOC 1 is associated with USTs along Kiamesha Lake Road. Two (2) 15,000 gallon #4 fuel oil USTs, and a 1,500 gallon suspected #2 fuel oil UST (which may have been utilized to store kitchen waste) are present within this AOC. AOC 2 is associated with a 20,000 Gallon UST at the corner of Kiamesha Lake Road and Concord Road. AOC 3 is associated with transformers that are either mounted on a pole or installed on concrete pads.

Between August and September 2008, thirty four (34) soil samples were collected from 16 boring locations, three (3) groundwater samples were collected from as many monitoring wells and one (1) soil vapor sample was collected from a vapor monitoring well within OU-1A. The soil and groundwater samples were analyzed for a combination of Target Compound List (TCL) volatile organic compounds (VOCs), TCL semi-volatile organic compounds, TCL pesticides and PCBs, cyanide and Target Analyte List (TAL) metals. The soil vapor sample was analyzed for VOCs only (USEPA Method TO-15).

A combination of benzo(a)anthracene, benzo(a)pyrene, benzo(b)flouranthene, benzo(k)flouranthene, chrysene and ideno(1,2,3-cd)pyrene were detected in soil samples collected, at the location of three (3) borings, at concentrations that exceeded the applicable Commercial or Protection of Groundwater Soil Cleanup Objectives (SCO). Several analytes (specifically, a combination of 4,4'-DDT copper, lead, nickel, and zinc) were detected at concentrations that exceeded the applicable Unrestricted Soil Cleanup Objectives (USCO), but did not exceed the Commercial and Protection of Groundwater SCOs in the soil samples. Total petroleum hydrocarbon (TPH) concentrations at these soil sample locations ranged between 180 - 5,800 mg/kg.

A combination of bis(2-ethylhexyl)phthalate, Chlordane, p,p'-DDE, p,p'-DDD, p,p'-DDT, manganese and sodium were detected, at concentrations that exceeded the applicable Standards Criteria and Guidance (SCGs) in the groundwater samples collected from the three (3) monitoring wells MW-7, MW-17 and MW-19 associated with OU-1A. Several other metals (Antimony, arsenic, barium, beryllium, chromium, copper, iron, lead, and nickel) were also detected at concentrations that exceeded the applicable SCGs which are likely due to the turbidity of the groundwater samples (these metals were not detected in filtered samples).

Free-phase product was observed at six (6) boring locations within the bedrock fractures and floating on the water in the fractures. Temporary monitoring wells were installed to delineate the extent of this free-phase product. The free product plume is about 250 feet long and 200 feet wide extending in a southwesterly direction. Because of its viscosity and presence within the bedrock seams, the thickness of the free-phase product, and subsequently its volume, could not be calculated. The "fingerprint" analysis associated with a sample of the product identified it as "tar substance." Similar product was observed in the vicinity of an UST and associated piping within OU-1A. Although the laboratory analysis was inconclusive, it is reasonable to assume that the free-phase product is a degraded No. 4 fuel oil, which the UST reportedly contained.

Qualitative Human Health Exposure Assessment

The Qualitative Human Health Exposure Assessment concluded that the likelihood of adverse human health effects as a result of exposure to the site's environmental media is remote. Some targeted analytes exceeded, either, the concentrations below which the lifetime risk of cancer is negligible, or, the threshold level below which non-cancer adverse health effects are unlikely. However, the risk associated with these contaminants following redevelopment is negligible because: no one is expected to be exposed to these contaminants over a standard lifetime of 70 years; remediation is expected to eliminate sources and potential exposure pathways; and potable water will be piped in from outside sources (water for on-Site consumption will be purchased from Village of Monticello by a new water district to be created in Township of Thompson) for on-Site consumption instead of utilizing groundwater associated with the Site.

Summary of the Remedy

To address the known soil/groundwater impacts and potential indoor air quality impacts associated with the Site, the following remedies have been proposed in this RAWP:

1. A Track 4 cleanup comprising of removal of source areas during the UST closures. Source area removals will include the removal and off-site disposal of grossly contaminated soil (i.e., soil impacted with free/residual-phase product). During the removal of source areas, Concord Associates will attempt to excavate all soil exceeding the commercial restricted use SCOs. The final limits of excavation will be determined in consultation with the NYSDEC. Any free-phase product within the bedrock will be addressed as discussed below.

2. A composite cover system consisting of soil cover in open areas, asphalt or concrete pavement on walkways, roads and parking lots, concrete building slabs, and "clean soil cover," in landscaped areas will prevent exposure to contaminated soils. The soil cover

layer will be one-foot thick and will consist of clean soil that meets 6NYCRR Part 375-6 Commercial and Protection of Groundwater SCOs. The soil cover will overly a demarcation layer indicating the top of residual contaminated soil. The top six inches of the soil cover will be of sufficient quality to support vegetation. Slabs and paving systems (buildings, roadways, parking lots, etc.) will be at least 6 inches thick.

3. An engineering control comprised of a monitoring well network. Initially, this engineering control will involve active free-phase product recovery. When active product recovery becomes no longer feasible a passive product recovery approach will be implemented. This passive approach will involve the monitoring of known groundwater impacts and free-phase product via annual groundwater sampling and monitoring well gauging for presence/thickness of free-phase product, and subsequent recovery as needed.

4. Institutional controls to be included in a Site-specific Environmental Easement to ensure the continual and proper management of residual contamination in the form of an approved Site Management Plan (SMP) and operation of engineering controls for protection of public health and the environment.

5. The use of groundwater without proper treatment will be restricted.

6. A Site Management Plan (SMP) will be developed that will include a review element to ensure the remedy and any institutional/engineering controls remain in place.

REMEDIAL ACTION WORK PLAN

1.0 INTRODUCTION

Concord Associates, LP entered into a Brownfield Cleanup Agreement (BCA) with the New York State Department of Environmental Conservation (NYSDEC) on May 19, 2005, to investigate and remediate about 14.5-acres of property located in Town of Thompson, Sullivan County New York. Concord Associates, LP is a Volunteer in the Brownfield Cleanup Program. Site usage type, i.e. Commercial use is proposed for the property. When completed, the Site will contain a Hotel and Resort. Refer to the Brownfield Cleanup Program (BCP) application for additional details.

This Remedial Action Work Plan (RAWP), which is limited to OU-1A ("Site" for the purposes of this RAWP) (see Figures 1 and 2 - one of the five operable units OU-1A, OU-1B, OU-1C, OU-2 and OU-3 that comprise the BCP Site), summarizes the nature and extent of contamination as determined from data gathered during the OU-1A Remedial Investigation (RI), performed between August and September 2008. This RAWP provides an evaluation of a Track 1 cleanup and other applicable Remedial Action alternatives for OU-1A, associated costs, and the recommended and preferred remedy. The remedy described in this document is consistent with the procedures defined in DER-10 and complies with all applicable standards, criteria and guidance. The remedy described in this document also complies with all applicable Federal, State and local laws, regulations and requirements. Since this RAWP is being submitted for public comment simultaneous with the RIR for OU-1A, the NYSDEC and New York State Department of Health (NYSDOH) have not yet determined that this Site does not pose a significant threat to human health and the environment. However, significant threat determination is anticipated in the near future, and is expected to be a non-significant threat determination based on the results of the RI. Moreover, the RI for this Site did not identify fish and wildlife resources.

Per DER-10 Section 3.10, a Fish and Wildlife Resources Impact Analysis (FWRIA) has been performed and can be found in Section 2.5.2. A formal Remedial Design document will not be prepared as the remedy for this Site entails principally source removal.

1.1 SITE LOCATION AND DESCRIPTION

The Site is located in the County of Sullivan, Town of Thompson, New York. A United States Geological Survey (USGS) topographical quadrangle (Figure 1) shows the Site location. The Site is situated on an approximately 2-acre area bounded by Kiamesha Lake Road to the north, Brownfield Site Expansion Area (BSEA) (area of former/proposed hotel and resort features) to the south and west, and Concord Road to the east (see Figure 2). A boundary map is attached to the BCA as required by Environmental Conservation Law (ECL) Title 14 Section

27-1419. The Site is fully described in Appendix 1 – Metes and Bounds. A global positioning system coordinate for the starting point is included.

1.2 CONTEMPLATED REDEVELOPMENT PLAN

The Remedial Action to be performed under the RAWP is intended to make the Site protective of human health and the environment consistent with the contemplated end use. The proposed redevelopment plan and end use is described here to provide the basis for this assessment.

As a part of the redevelopment activities in the vicinity of the Site, construction of a Hotel and Resort complex is planned. Approximately one eighth (10,000± sf) of the 2± acres within OU-1A will eventually be occupied by new buildings, with the remainder loading/roadway areas and landscape areas. The Project redevelopment will occur in several phases throughout the next few years, and will ultimately include construction of a casino, event center, theatre, ballroom, hotel towers, two multi-level parking garages, new access roads, etc. occupying an additional 31± acres located immediately south-southwest of OU-1A (see Figure 3). The remedial actions proposed in this plan are designed to ensure protection of human health and the environment through the first phase of construction. Subsequent remedial actions required as a result of future redevelopment will be addressed in the Site Management Plan.

1.3 DESCRIPTION OF SURROUNDING PROPERTY

The surrounding properties consist of single family residential uses and vacant parcels.

- Schools and/or day care facilities – there are no schools or day care centers on or adjacent to the Site.
- Hospitals – the nearest hospital is the Catskill Regional Medical Center located in Harris, NY, approximately five miles northwest of the Site (see Figure 4).
- Residential areas – A few single family residential uses are located in the vicinity of the Site.
- Rivers, streams - There are no rivers or streams on or immediately adjacent to OU-1A. However, Kiamesha Lake is located approximately 1,200 feet to the west of OU-1A and Kiamesha Creek is located about 2,400 feet southeast of OU-1A.
- Wetlands – There are no wetlands on or immediately adjacent to OU-1A. Wetlands associated with Kiamesha Lake exist at a distance of about 600 feet west of OU-1A.
- Human/Ecological Receptors – Human exposures may occur due to contact with soils and during construction activities. Ecological exposures may occur due to contact with contaminated stockpiles during excavation.

2.0 DESCRIPTION OF REMEDIAL INVESTIGATION FINDINGS

The Site was investigated in accordance with the scope of work presented in the NYSDEC-approved Remedial Investigation (RI) Work Plan dated July 24, 2008. The investigation was conducted between August and September 2008. The RI report is being submitted concurrently with this RAWP.

2.1 SITE HISTORY

2.1.1 Past Uses and Ownership

The five OUs that collectively make up the BCP Site and the pending BSEA are part of an expansive Concord Resort Complex that was built in stages over the past 80 years. Previously, the area was either farmland or forest. The Concord Hotel Area (OU-1A and the BSEA) was built in the 1920s on the shore of Kiamesha Lake. It was used as a summer retreat by New York City area residents.

The resort area continued to expand through the 1960s, by which time the site was similar to its current layout. Several of the Main Hotel buildings were demolished over the years. Some of these demolished buildings were evidently buried on site (ECSI, 1998), either at the Main Hotel OU or at other parcels within the resort complex. The hotel was serviced by underground storage tanks (USTs), PCB-containing transformers, utilized pesticides and other chemicals, which after abandoned leaked and leached and have left these areas contaminated. The Complex was abandoned in the early 1990's. Illegal dumping and contamination associated with abandonment of the facility occurred between the early 1990's and the present.

Recently, with the commencement of the planned redevelopment project by the Volunteer, the remaining on-site the buildings have been demolished and related asbestos abatement is complete.

2.1.2 Phase I and Phase II Reports

Phase I and II Environmental Site Assessments were performed for the entire 1,700 acre Concord Resort Complex in September 1998 and July 2004 by Environmental Compliance Services, Inc. (ECSI) and IVI International, Inc. (IVI), respectively. The results of these assessments are included in their entirety as Appendix A to the RIWP dated October 11, 2007, last revised July 24, 2008. Additional information on the presence of known or suspected contamination has been sent to the NYSDEC from Concord Associates, LP, and its environmental contractors involved with the project. Based on the results of these historical investigations, as well as the investigation results outlined in Section 2.1 above, SESI has identified ten Areas of Concern (AOCs) requiring remedial investigation and/or remedial action in the BCP Site. Three of these AOCs, AOC 1 through AOC 3 pertain to the OU-1A Area. These AOCs are outlined in greater detail in Section 2.4.2 below. This RAWP is specifically related to the three AOCs present in OU-1A.

2.2 GEOLOGICAL CONDITIONS

Sullivan County lies within the Appalachian Plateau physiographic province of New York State. Regional bedrock is primarily middle to late Devonian shale, however, SESI encountered primarily sandstone in OU-1A during the July-August site characterization investigation and Geotechnical Engineering investigation conducted May through July 2008. Bedrock is generally shallow throughout the BCP Site, and was encountered at depths ranging from approximately 1.5 to 34 feet bgs in OU-1A.

Overburden consists primarily of sand with silt and gravel intermixed. The Main Hotel area, encompassing OU-1A and the BSEA, lies at the top of a ridge. Groundwater was not encountered in the overburden in OU-1A or the BSEA, but was encountered in bedrock. Bedrock elevation data indicates that west of the ridge, groundwater flows through bedrock (and potentially down-gradient soil overburden) towards Kiamesha Lake to the west.

A geologic section is shown in Figure 5. The groundwater flow map is included as Figure 6.

2.3 CONTAMINATION CONDITIONS

2.3.1 Conceptual Model of Site Contamination

- The OU-1A Area contains a thin layer of fill material, impacted above applicable SCGs with metals. The depth and composition of the fill varies across the OU. Low levels of metals contamination was identified at depths ranging from the ground surface to approximately 28 feet bgs. VOC/SVOC contamination, presumably associated with leaking USTs, was identified at depths ranging from 13.5 to 17 feet bgs. Bedrock was encountered from approximately 1.5 to 34 feet bgs. Groundwater was not encountered above the underlying bedrock.

2.3.2 Description of Three OU-1A Areas of Concern

<u>AOC 1 – USTs along Kiamesha Lake Road</u> – The Main Hotel utilized two 15,000-gallon #4 fuel oil USTs, and a 1,500-gallon UST that reportedly contained #2 fuel oil and/or kitchen waste. The two 15,000-gallon USTs are located near the intersection of Kiamesha Lake Road

and Concord Road, and the smaller UST was located near a kitchen entrance fronting Kiamesha Lake Road.

On February 28, 1998 the tank's integrities were tested by Precision Tank Testing, LLC. The two 15,000-gallon tanks were tested and passed the integrity tests. Therefore, no additional investigation was completed. The 1,500-gallon tank, however, failed integrity testing and soil borings were installed around the tank. Soil samples collected from the borings were screened with a PID, but PID readings did not provide evidence indicating a release occurred. The 1,500-gallon UST was evacuated and sealed to await later decommissioning. Additionally, JM Associates, Inc., on 11/30/06, evacuated the two 15,000-gallon tanks.

<u>AOC 2 – 20,000 Gallon UST at the Corner of Kiamesha Lake Road and Concord Road</u> – Reportedly, this UST may be located, either in part or entirely, beneath the existing roadways. Due to its suspected location, this UST has not been tested or pumped out.

<u>AOC 3 – Pole- and Concrete Pad-Mounted Transformers</u> – Several telephone pole-mounted electrical transformers and concrete pad-mounted electrical transformers in OU-1A represent an AOC; however, this AOC was addressed pursuant to a separate Interim Remedial Measures Work Plan (IRMWP) dated June 18, 2008 and approved by the NYSDEC on July 23, 2008. On August 20 and September 5, 2008, these transformers, together with others located in the vicinity of OU-1A, were disposed of off-Site by JM Associates, Bedford Hills, New York. The transformers, depending on their PCB concentrations, were disposed of at TCI of NY, LLC, Hudson, New York and TCI of Alabama, Pell City, Alabama. Complete details of these remedial activities completed in accordance with the NYSDEC approved Interim Remedial Measures Work Plan for the transformers will be submitted as a part of the Final Engineering Report.

2.3.3 Identification of Standards, Criteria and Guidance

The following standards and criteria typically will apply to Site Characterizations, Remedial Investigations, remedy selection, UST closures, remedial actions and site management activities:

- 6 NYCRR Part 257 - Air Quality Standards
- 29 CFR Part 1910.120 - Hazardous Waste Operations and Emergency Response
- TAGM 4046 - Determination of Soil Cleanup Objectives and Cleanup Levels (January 1994)
- TOGS 1.1.1 - Ambient Water Quality Standards & Guidance Values and Groundwater Effluent Limitations
- Fish and Wildlife Impact Analysis for Inactive Hazardous Waste Sites (October 1994)
- Technical Guidance for Screening Contaminated Sediments (January 1999)

- NYSDOH Guidance for Evaluating Soil Vapor Intrusion in the State of New York (draft October 2004 or subsequent final draft)
- DER Interim Strategy for Groundwater Remediation at Contaminated Sites in New York State
- 6 NYCRR Part 375 - Regulations Subparts 1, 3 and 6 applicable to the Brownfield Cleanup Program
- TAGM 4051 - Early Design Strategy (August 1993)
- Citizen Participation in New York's Hazardous Waste Site Remediation Program: A Guidebook (June 1998)
- TAGM 3028 - "Contained In" Criteria for Environmental Media: Soil Action Levels (August 1997)
- Air Guide 1 - Guidelines for the Control of Toxic Ambient Air Contaminants
- USEPA Office of Solid Waste and Emergency Response Directive 9355.047FS Presumptive Remedies: Policy and Procedures (September 1993)
- USEPA Office of Solid Waste and Emergency Response Directive 9355.048FS Presumptive Remedies:
- Site Characterization and Technology Selection for CERCLA sites with Volatile Organic Compounds in Soils (September 1993)
- 6 NYCRR Part 612 - Registration of Petroleum Storage Facilities (February 1992)
- 6 NYCRR Part 613 - Handling and Storage of Petroleum (February 1992)
- 6 NYCRR Part 614 - Standards for New and Substantially Modified Petroleum Storage Tanks (February 1992)
- 6 NYCRR Part 371 - Identification and Listing of Hazardous Wastes (November 1998)
- 6 NYCRR Subpart 374-2 - Standards for the Management of Used Oil (November 1998)
- 6 NYCRR Parts 700-706 - Water Quality Standards (June 1998)
- 40 CFR Part 280 - Technical Standards and Corrective Action Requirements for Owners and Operators of Underground Storage Tanks
- STARS #1 - Petroleum-Contaminated Soil Guidance Policy
- STARS #2 - Biocell and Biopile Designs for Small-Scale Petroleum-Contaminated Soil Projects
- SPOTS #14 - Site Assessments at Bulk Storage Facilities (August 1994)
- Spill Response Guidance Manual

- Permanent Closure of Petroleum Storage Tanks (July 1988)
- NYSDOH Environmental Health Manual CSFP-530 - "Individual Water Supplies - Activated Carbon Treatment Systems"
- 40 CFR Part 144 - Underground Injection Control Program
- 10 NYCRR Part 67 – Lead
- 12 NYCRR Part 56 - Industrial Code Rule 56 (Asbestos)
- 6 NYCRR Part 175 - Special Licenses and Permits--Definitions and Uniform Procedures
- 6 NYCRR Part 371 - Identification and Listing of Hazardous Wastes (November 1998)
- 6 NYCRR Part 372 - Hazardous Waste Manifest System and Related Standards for Generators, Transporters and Facilities (November 1998)
- 6 NYCRR Subpart 374-1 - Standards for the Management of Specific Hazardous Wastes and Specific Types of Hazardous Waste Management Facilities (November 1998)
- 6 NYCRR Subpart 374-3 - Standards for Universal Waste (November 1998)
- 19 NYCRR Part 600 - Waterfront Revitalization and Coastal Resources
- 6 NYCRR Part 608 - Use and Protection of Waters
- 6 NYCRR Part 661 - Tidal Wetlands - Land Use Regulations
- 6 NYCRR Part 663 - Freshwater Wetlands - Permit Requirements
- 6 NYCRR Part 750 through 758 - Implementation of NPDES Program in NYS ("SPDES Regulations")
- TAGM 4013 - Emergency Hazardous Waste Drum Removal/ Surficial Cleanup Procedures (March 1996)
- TAGM 4059 - Making Changes To Selected Remedies (May 1998)
- Groundwater Effluent Limitations
- TOGS 1.3.8 - New Discharges to Publicly Owned Treatment Works
- TOGS 2.1.2 - Underground Injection/Recirculation (UIR) at Groundwater Remediation Sites
- State Coastal Management Policies
- OSWER Directive 9200.4-17 - Use of Monitored Natural Attenuation at Superfund, RCRA Corrective Action, and Underground Storage Tank Sites (November 1997)
- Groundwater Monitoring Well Decommissioning Procedures (May 1995)

- The activity is a component of a program selected by a process complying with the public participation requirements of section 1.10, to the extent applicable.

2.4 SUMMARY OF REMEDIAL INVESTIGATIONS PERFORMED

2.4.1 Borings and Wells

Thirty four (34) soil samples were collected from 16 boring locations. Four (4) monitoring wells were installed within OU-1A and several temporary wells (to delineate off-Site extent of free-phase product observed within OU-1A) were installed outside OU-1A. The locations of the soil borings, monitoring wells and temporary wells are depicted on Figures 8 and 9. The boring logs and monitoring well construction logs are included as Appendix 2 and Appendix 3, respectively. Soil samples collected were selected based on field screening results, including visual observations, olfactory indicators, and screening with a photoionization detector (PID).

The soil and groundwater samples were primarily analyzed for a combination of Target Compound List (TCL) Volatile Organic Compounds (VOCs), TCL Semi-Volatile Organic Compounds, TCL pesticides and PCBs, Target Analyte List (TAL) metals and cyanide. A summary of the samples collected and associated depths, etc are summarized on Table 1.

2.4.2 Samples Collected and Analytical Work Performed

AOC 1 – USTs Along Kiamesha Lake Road

Eleven (11) soil samples were collected from boring locations OU1A- 9, OU1A-10, OU1A-12, OU1A-13, OU1A-14, and OU1A-15. The samples were analyzed for a combination of VOCs, SVOCs and TPH.

AOC 2 – 20,000 Gallon UST

Samples were collected from boring locations OU1A-11 and OU1A-18 from the vicinity of the UST and analyzed for VOCs, SVOCs and TPH.

AOC 3 – Pole and Concrete-Pad Mounted Transformers

Two soil samples, one surficial and one relatively deep, were collected from the vicinity of transformers T-10 and T-13. The samples were analyzed for PCBs.

Groundwater Samples from Monitoring Wells

Groundwater samples from monitoring wells MW-4, MW-7 and MW-19 were analyzed for VOCs, SVOCs, pesticides, PCBs and metals. Groundwater samples from MW-17 were only analysed for VOCs due to low water yield from the well. Sixteen groundwater samples were also collected from temporary monitoring wells 7A through 7P. These samples were analyzed for VOCs and SVOCs.

Below is a summary of RI findings.

2.4.3 Soil/Fill Contamination

Analytical results of samples collected during the course of the site characterization and remedial investigation work are summarized in table 2.

<u>AOC 1 – USTs Along Kiamesha Lake Road</u>

Eleven (11) soil samples were collected from boring locations OU1A- 9, OU1A-10, OU1A-12, OU1A-13, OU1A-14, and OU1A-15. The samples were analyzed for a combination of VOCs, SVOCs and TPH.

A combination of benzo(a)anthracene (2.3 - 15.0 mg/kg), benzo(a)pyrene (1.3 – 11.0 mg/kg), benzo(b)flouranthene (1.4 – 16.0 mg/kg), benzo(k)flouranthene (4.9 mg/kg) chrysene (1.2 – 14.0 mg/kg) and indeno(1,2,3-cd)pyrene (1.0 – 7.0 mg/kg) were detected in samples collected from borings OU1A-9, OU1A-10, OU1A-13 and OU1A-15 at concentrations that exceeded the applicable SCGs. The remaining compounds were either not detected at concentrations that exceeded the reporting limits or did not exceed the applicable SCGs. TPH impacts were detected (180 - 5,800 mg/kg).

<u>AOC 2 – 20,000 Gallon UST</u>

Samples were collected from boring locations OU1A-11 and OU1A-18 from the vicinity of the UST and analyzed for VOCs, SVOCs and TPH. All the targeted analytes were detected at concentrations that either did not exceed the reporting limits or were detected at concentration below the applicable SCGs. TPH concentrations in the soil sample collected from boring OU1A-11 was 1,700 mg/kg.

<u>AOC 3 – Pole and Concrete-Pad Mounted Transformers</u>

Two soil samples, one surficial and one relatively deep, were collected from the vicinity of transformers T-10 and T-13. The samples were analyzed for PCBs. Results indicated that, in the surficial soil samples, PCBs were present at concentrations (of about 0.08 mg/kg) that exceeded the reporting limits but did not exceed the applicable SCGs.

<u>Samples Collected Outside Known AOCs</u>

Eighteen samples were collected from nine boring locations OU1A-1, OU1A-2, OU1A-3, OU1A-5, OU1A-6, OU1A-8, OU1A-9, OU1A-10, and OU1A-11. The samples were analyzed for TCL VOCs, TCL SVOCs, TCL PCBs, TCL pesticides and TAL metals. All the targeted analytes either did not exceed their reporting limits or were detected at concentrations that did not exceed the applicable SCGs.

Table 2 shows exceedances from Track 1 Unrestricted SCOs for all soil/fill at the Site. While the concentrations of some analytes exceeded the Track 1 SCOs, site-soil generally meets the commercially restricted use SCOs, with only some slight exceedances of polycyclic aromatic hydrocarbons (PAHs) in discrete locations. Figure 8 is a spider map that shows the location and summarizes exceedances from Track 1 Unrestricted SCOs for all soil/fill.

2.4.4 On-Site and Off-Site Groundwater Contamination

Groundwater samples were collected from the monitoring wells MW-4, MW-7, MW-17 and MW-19 installed within OU-1A. All the groundwater samples, with the exception of groundwater sample collected from MW-17, were analyzed for TCL VOCs, TCL SVOCs, TCL PCBs, TCL pesticides and TAL Metals. Sample collected from monitoring well MW-17 was analyzed only for VOCs as this well recharged slowly and did not yield enough sample volume. A summary of the geochemical parameters recorded during the groundwater sampling event are summarized in Table 3.

The groundwater analytical results, summarized in Table 4, indicate that the following analytes exceeded the applicable SCGs (specifically TOGS 1.1.1):

- bis(2-Ethylhexyl)phthalate (18.0 µg/L) in the sample collected from monitoring well MW-7;
- Chlordane (0.53 µg/L) and P,P'-DDT (0.71 µg/L) in the sample collected from monitoring well MW-4;
- Manganese (970 - 4,000 µg/L) and sodium (76,000 - 240,000 µg/L) in the samples (filtered) collected from monitoring wells MW-4, MW-7 and MW-19. Several other metals (antimony, arsenic, barium, beryllium, chromium, copper, iron, lead, and nickel) were detected at concentrations that exceeded the applicable SCGs in the unfiltered samples.

Free-phase product was observed within a fracture located 12 to 18 inches into the rock core extracted during the installation of MW-7 (refer to the revised monitoring well construction log included in Appendix 2). The free-phase product was subsequently sampled from the well and "fingerprinted" via laboratory analysis. The "fingerprint" results identified the free-phase product as "tar substance" (based on field observations it is likely weathered #4 fuel oil associated with the UST). Temporary monitoring wells (7A through 7P) were installed into bedrock outside of OU-1A in the vicinity of MW-7 to delineate the extent of this free-phase product. Delineation consisted of visually identifying the presence of the product in the wells, and if present measuring the thickness. Because of its viscosity and presence within the bedrock seams, the thickness of the free-phase product, and subsequently its volume, could not be calculated. The thickness of the free-phase product is likely to correspond to the varying thicknesses of the uppermost bedrock seams in the vicinity of the plume. The horizontal extent of the delineated plume is approximately 150 feet by 300 feet and is depicted on Figure 9. The free-phase product is black/brown in color, contains a slight petroleum odor, and registered readings ranging from 0 to 5 parts per million (ppm) when screened with a PID. Photo-documentation of the NAPL plume investigation is included as Appendix 13.

A table that indicates exceedances from GA groundwater standards in monitor wells prior to the remedy is shown in Table 4. A spider map that indicates the location(s) of and summarizes exceedances from GA groundwater standards prior to the remedy is shown in Figure 9.

2.4.5 On-Site and Off-Site Soil Vapor Contamination

One soil vapor sample was collected in OU-1A from location Vapor Well No. 16 in the vicinity of the USTs and analyzed for VOCs. Six analytes were detected with two, Acetone and Methyl Ethyl Ketone (MEK), exceeding the USEPA Target Shallow Soil Gas Screening Levels (SGSL) at a risk exceeding 10^{-4}. Acetone was detected at a concentration of 13,000 parts per billion volume (ppbv), which exceeds the SGSL criteria of 1,500 ppbv, and MEK was detected at a concentration of 9,000 ppbv, which exceeds the SGSL criteria of 3,400 ppbv.

Eight soil vapor samples were collected from adjacent areas of the site bordering OU-1A. Neither Acetone nor MEK were detected at concentrations above the SGSL in any of these eight samples. Six of the eight samples contained soil gas above the SGSLs; however, only one sample location (VW-9) is in the proximity of a structure proposed for a future phase of construction in OU-1A. Soil gas results from VW-9 contained USEPA SGSL exceedances for Chloroform, Methylene Chloride, and Tetrachloroethylene.

A table of soil vapor data collected prior to the remedy is shown in Table 5. A spider map that indicates the location(s) of and summarizes soil vapor data prior to the remedy is shown in Figure 10.

2.5 ENVIRONMENTAL AND PUBLIC HEALTH ASSESSMENTS

2.5.1 Qualitative Human Health Exposure Assessment

A Qualitative Human Health Exposure Assessment completed by Atlantic Environmental, Inc. of Dover, New Jersey is included as Appendix 4. The Qualitative Human Health Exposure Assessment concluded that the likelihood of adverse human health effects as a result of exposure to the site's environmental media is remote. Some targeted analytes exceeded, either, the concentrations below which the lifetime risk of cancer is negligible, or, the threshold level below which non-cancer adverse health effects are unlikely. However, the risk associated with these contaminants following redevelopment is negligible because: no one is expected to be exposed to these contaminants over a standard lifetime of 70 years; remediation is expected to eliminate sources and potential exposure pathways; and potable water will be piped in from remote sources for on-Site consumption instead of utilizing groundwater associated with the Site.

2.5.2 Fish & Wildlife Remedial Impact Analysis

A copy of the Fish and Wildlife Impact Analysis (FWIA), completed in accordance with DER-10 is included as Appendix 5. The analysis concluded that existing fish and wildlife habitat is absent within OU-1A and minimal in the immediate surrounding areas within a half-mile radius. It also concludes that the presence of surrounding impervious/disturbed areas prohibits/minimizes the likelihood of adverse effects and ecological risks to fish and wildlife resources from the migration of constituents of potential ecological concern. Additionally, remedial activities and on-Site improvements associated with storm water controls, would remove the potential pathways for contamination migration to down-gradient ecological receptors.

2.6 SIGNIFICANT THREAT

The NYSDEC and NYSDOH are currently evaluating the RIR to discern if this Site does/does not pose a significant threat to human health and the environment. Notice of that determination will be provided for public review.

2.7 REMEDIAL ACTION OBJECTIVES

Based on the results of the Remedial Investigation, the following Remedial Action Objectives (RAOs) have been identified for this Site.

2.7.1 Groundwater

RAOs for Public Health Protection

- Prevent ingestion of groundwater containing contaminant levels exceeding drinking water standards.
- Prevent contact with, or inhalation of, volatiles emanating from contaminated groundwater.

RAOs for Environmental Protection

- Restore ground water aquifer, to the extent practicable, to pre-disposal/pre-release conditions.
- Prevent the discharge of contaminants to surface water.
- Remove the source of ground or surface water contamination.

2.7.2 Soil

RAOs for Public Health Protection

- Prevent ingestion/direct contact with contaminated soil.
- Prevent inhalation of, or exposure to, contaminants volatilizing from contaminated soil.

RAOs for Environmental Protection

- Prevent migration of contaminants that would result in groundwater or surface water contamination.
- Prevent impacts to biota due to ingestion/direct contact with contaminated soil that would cause toxicity or bioaccumulation through the terrestrial food chain.

3.0 DESCRIPTION OF REMEDIAL ACTION PLAN

3.1 EVALUATION OF REMEDIAL ALTERNATIVES

Track 1

The Track 1 cleanup alternative would allow the site to be redeveloped for unrestricted future use. This alternative would involve the complete removal and/or remediation of all contaminated soils above bedrock (or water table which ever is encountered first). Long-term institutional and engineering controls would be implemented to address contamination in groundwater or soil vapor, if applicable. A feasible remedial technology that may be used to implement this alternative involves the excavation of the contaminated soil and transportation to an off-site facility for disposal.

Tracks 2 and 3

Track 2 and 3 cleanup alternatives involve remediation of the site to commercial criteria rather than the unrestricted Track 1 alternative. The Track 2 alternative would meet the commercial Soil Cleanup Objectives as opposed to the Track 1 unrestricted SCOs, or alternatively, the Department may approve a site-specific modification to the Track 2 objectives for a Track 3 cleanup. Both tracks would involve remediation of impacted soil to bedrock or a depth of 15 feet below proposed finished grades, whichever is encountered first, until the applicable SCOs are achieved. Long-term institutional and engineering controls would be implemented to address contamination in groundwater or soil vapor, if applicable. A feasible remedial technology that may be used to implement these alternatives is also excavation and off-Site disposal as discussed above.

Track 4

The Track 4 cleanup alternative would involve hot spot/source removal and construction of a capping system over the remaining contaminated soils. The cap would consist of concrete slabs, asphalt pavement, or soil meeting the commercial soil cleanup criteria. Below the capping system, contaminated soil could remain; however, locations that are source areas (e.g. grossly impacted soil) and soil impacts exceeding the commercial SCOs will be addressed either by removal, containment, or treatment in an attempt to achieve commercially restricted use SCOs. If Concord Associates determines commercially restricted use SCOs cannot be reasonably achieved, the NYSDEC will be contacted for consultation and determination of final limits of excavation. Long-term institutional controls would be implemented to address residual impacted soils and groundwater impacts, as applicable.

Site capping typically involves constructing a separation layer (e.g. a one-foot soil capping layer with an underlying demarcation geotextile) to prevent direct contact with the contaminants, and restrict storm water from entering the subsurface. This alternative may be combined with another treatment method to reduce the volume/concentration of contamination remaining on site under the cap (e.g., free-phase product removal associated with OU-1A). Methods to address migration of volatilized contaminants through the cap may be integrated into the design (e.g. sub-slab vapor extraction system).

Track 4 cleanup would also include an engineering control comprised of a monitoring well network. This engineering control will involve an initial period of active free-phase product recovery, which is anticipated to occur for approximately three months. Once the initial, readily recoverable free-phase product is removed, subsequent monitoring of known groundwater impacts and free-phase product will occur via annual groundwater sampling and monitoring well gauging for presence/thickness of free-phase product. Recovery of any residual free-phase product will occur as needed during the monitoring period. A schedule and protocol for monitoring these wells and recovering residual product (if required) will be proposed in the Site Management Plan.

A discussion of these approaches and whether or not they satisfy the remedial action selection criteria is included below.

Protection of human health and the environment:

Although all tracks will provide adequate protection of human health and the environment, Track 1 would be the most favorable because it involves the complete removal of all soil contamination and the removal of the bulk of groundwater contamination, ultimately leaving the least amount of contamination on-site. Thus, a Track 1 cleanup would be marginally more protective than the other cleanup tracks.

Compliance with standards, criteria, and guidelines (SCGs):

All cleanup tracks will achieve applicable cleanup standards.

Short-term effectiveness and impacts:

Tracks 1 through 3 are the least favorable in terms of short-term effectiveness primarily because they involve removal and/or treatment of the soil to depths extending beneath the proposed construction grades. This is less favorable than the Track 4 approach because it would expose construction workers to a greater volume of contaminated soil, prolong the remediation schedule, and result in a greater potential for migration of impacts from the open excavation (e.g. wind erosion, storm water intrusion, etc.).

Long-term effectiveness and permanence:

Because Track 1 would involve removal of the greatest amount of contaminated soil, it would provide the most long-term effectiveness; however, it is cost prohibitive due to the depth of the excavation. The site capping system associated with the Track 4 cleanup is a cost effective long-term remedial strategy, even though it involves the highest level of long term maintenance among the four tracks.

Reduction of toxicity, mobility, or volume of contaminated material:

Tracks 1 through 4 all involve an ultimate reduction of toxicity and volume of contaminated material. While Track 4 provides a relatively smaller reduction in volume than the other tracks, it relies primarily on source removal and the decrease in contaminant mobility to serve as an effective remedial alternative.

Implementability:

Based on the site redevelopment plan, Track 4 is the most feasible remedial alternative. To achieve the proposed grades, the site requires a net excavation of approximately 22,000 tons of soil. Additionally, the proposed paving, concrete, and foundations will serve as a site cap. Track 1 is the most difficult to implement because of the deeper excavation depths and associated excavation support systems that would be required along the entire perimeter of the site.

Cost effectiveness:

The preferred alternative should provide optimal suitability of the eight accompanying evaluation factors with minimal remedial cost. Because of the extent of contamination at the site, Tracks 1 through 3 will involve the excavation of a larger volume of contaminated soil, and would result in a longer remedial construction schedule. Track 4 minimizes the remedial schedule, while satisfying the other eight evaluation criteria; therefore, it is the most cost effective remedial alternative.

Community Acceptance:

A community outreach program will be incorporated into all remedial alternatives, per NYSDEC Brownfield Program law and regulations. Track 4 cleanup would result in the widest level of acceptance throughout the community because it would allow for the RA and the redevelopment of the Site to proceed in the most expedited time frame with minimal truck traffic of contaminated soil through the community. The other tracks, particularly Track 1, would be cost prohibitive, and therefore, the redevelopment might not occur and would generate significant truck traffic to move contaminated soils off-site.

Land use:

All cleanup tracks would achieve remediation with little to no impact to the current or proposed redevelopment land use of the area since OU-1A is near the center of the 1,700 acre Concord Site Complex and not in proximity to any other adjacent redevelopment site.

Remedial Action standards, criteria and guidance should be listed and in most cases, should include at a minimum the following.

- 6 NYCRR Part 375-6.8 Soil Cleanup Objectives
- New York State Groundwater Quality Standards – 6 NYCRR Part 703;
- NYSDEC Ambient Water Quality Standards and Guidance Values – TOGS 1.1.1;
- NYSDEC Draft DER-10 Technical Guidance for Site Investigation and Remediation - December 2002 (or later version if available);
- NYSDEC Draft Brownfield Cleanup Program Guide – May 2004;
- New York State Department of Health (NYSDOH) Generic Community Air Monitoring Plan
- NYS Waste Transporter Permits – 6 NYCRR Part 364;
- NYS Solid Waste Management Requirements – 6 NYCRR Part 360 and Part 364;
- NYSDEC Determination of Soil Cleanup Objectives and Cleanup Level – TAGM 4046

3.2 SELECTION OF THE PREFERRED REMEDY

Zoning: Implementation of a Track 4 cleanup will facilitate the proposed commercial development, which is consistent with applicable zoning laws and anticipated future use of the site.

Applicable comprehensive community master plans or land use plans: Implementation of a Track 4 cleanup will facilitate the proposed commercial development, which is consistent with current land use plan, which underwent an extensive SEQRA EIS process and was approved by the impacted municipalities.

Surrounding property uses: The Track 4 cleanup approach is not expected to impact land use of the surrounding properties as it involved minimal truck traffic compared to the other potential remedies.

Citizen Participation: Citizen Participation during implementation of a Track 4 remedial program will proceed in accordance with the Citizen Participation Plan included as Appendix 6 of this RAWP and as noted above will have minimal community impact.

Environmental justice concerns: There are no known environmental justice concerns associated with this project. Monticello is in an economically distressed area, but this project will help this area by creating numerous jobs.

Land use designations: A Track 4 remedy will not restrict any current or future land use designations.

Population growth patterns: A Track 4 remedy will not impact reasonably anticipated population growth patterns in the area.

Accessibility to existing infrastructure: Existing infrastructure at the site will be demolished and new infrastructure installed as part of remediation/redevelopment.

Proximity to natural resources: The site is in close proximity to Kiamesha Lake and Kiamesha Creek. Measures to protect this natural resource during remediation/redevelopment will be addressed in the Storm Water Pollution Prevention Plan (SWPP), included as Appendix 10. A well search completed in accordance with DER-10 identified only two (2) well completion records within a mile from the Site. The nearest well is located about 3,000 feet to the west (on the northern side of Kiamesha Lake). Given the relatively low groundwater impacts and large distances, it is unlikely that groundwater impacts associated with the Site are influenced by the pumping at these off-Site well locations.

Off-Site groundwater impacts: No off-Site potential groundwater impacts were identified during the RI activities activities with the exception of the LNAPL plume which is migrating off-site into the BSEA. Measures to prevent any off-site groundwater impacts are proposed in this work plan.

Geography and geology of the Site: See Sections 2.2 and 2.3 above.

Current Institutional Controls: There are no current institutional controls associated with the site. An institutional control will be required to address the long-term management of soil and potentially impacted groundwater remaining at the site following remediation.

3.3 SUMMARY OF SELECTED REMEDIAL ACTIONS

A summary of the remedial actions, to address the impacts identified within OU-1A, are discussed below:

1. Source removal excavation will be limited to soil that is grossly contaminated (i.e., soil that may act as a source of groundwater impacts or soil vapor with a potential to impact indoor air quality in structures up to 100 feet away) or is impacted at levels that significantly exceed the Site-specific SCOs listed in Table 6 (i.e., concentrations significantly exceeding commercial or protection of groundwater soil cleanup objectives) as well as soil / fill needed to be removed to complete the proposed construction project. Concord Associates will attempt to achieve commercially restricted use SCOs; however, if it is determined that these SCOs cannot be reasonably achieved, the NYSDEC will be contacted for consultation and determination of final limits of excavation;

2. Construction and maintenance of an engineered composite cover consisting of a building, roadways and "clean cover" in landscaped areas to prevent human exposure to residual contaminated soil/fill remaining under the Site;

3. Periodic removal of the free-phase product, gauging of free-phase product thickness and collection of groundwater samples (annually) from monitoring wells installed in the vicinity of the free-phase product ("tar substance") impacts encountered within OU-1A.

4. Recording of an Environmental Easement, including Institutional Controls, to prevent future exposure to any residual contamination remaining at the Site;

5. Publication of a Site Management Plan for long term management of residual contamination as required by the Environmental Easement, particularly as they pertain to future phases of construction, including plans for: (1) Institutional and Engineering Controls, (2) monitoring, (3) operation and maintenance and (4) reporting;

6. Screening for indications of contamination (by visual means, odor, and monitoring with PID) of all excavated soil during any intrusive Site work;
7. Collection and analysis of end-point samples to evaluate the performance of the remedy with respect to attainment of the commercial Site-specific SCOs;
8. Appropriate off-Site disposal of all material removed from the Site in accordance with all Federal, State and local rules and regulations for handling, transport, and disposal;
9. Import of materials and soil excavated during redevelopment construction activities within OU-1A, to be used for backfill and cover will be in compliance with: (1) chemical limits and other specifications included in Table 6, (2) all Federal, State, local rules and regulations and site-specific approvals [i.e. the Beneficial Use Determination (BUD) pending approval by NYSDEC] for handling/reuse and transport of material;
10. All responsibilities associated with the Remedial Action, including permitting requirements and pretreatment requirements, will be addressed in accordance with all applicable Federal, State and local rules and regulations.

Remedial activities will be performed at the Site in accordance with this NYSDEC-approved RAWP. All deviations from the RAWP will be promptly reported to NYSDEC for approval and fully explained in the FER.

4.0 REMEDIAL ACTION PROGRAM

4.1 GOVERNING DOCUMENTS

4.1.1 Site Specific Health & Safety Plan (HASP)

A copy of the SESI HASP is included as Appendix 7. All remedial work performed under this plan will be in full compliance with governmental requirements, including Site and worker safety requirements mandated by Federal OSHA.

The Volunteer and associated parties preparing the remedial documents submitted to the State and those performing the construction work, are completely responsible for the preparation of an appropriate Health and Safety Plan and for the appropriate performance of work according to that plan and applicable laws.

The Health and Safety Plan (HASP) and requirements defined in this Remedial Action Work Plan pertain to all remedial and invasive work performed at the Site until the issuance of a Certificate of Completion.

The Site Safety Coordinator will be Mark B. Anderson, C.L.A., P.P. A resume will be provided to NYSDEC prior to the start of remedial construction.

Confined space entry will comply with all OSHA requirements to address the potential risk posed by combustible and toxic gasses.

4.1.2 Quality Assurance Project Plan (QAPP)

A copy of the SESI QAPP is included as Appendix 8. All field sampling procedures and analytical methods will be implemented in accordance with this QAPP.

4.1.3 Construction Quality Assurance Plan (CQAP)

The Construction Quality Assurance Plan (CQAP) is included in Appendix 9. This plan describes how the successful performance of the Remedial Action tasks will be assured through designed and documented QA/QC methodologies applied in the field and in the lab. The CQAP provides a detailed description of the observation and testing activities that will be used to monitor construction quality and confirm that remedy construction is in conformance with the remediation objectives and specifications. The CQAP includes:

- Responsibilities and authorities of the organizations and key personnel involved in the design and construction of the remedy.
- Qualifications of the quality assurance personnel that demonstrate that they possess the proper training and experience necessary to fulfill project-specific responsibilities.
- The observations and tests that will be used to monitor construction and the frequency of performance of such activities.
- The sampling activities, sample size, sample locations, frequency of testing, acceptance and rejection criteria, and plans for implementing corrective measures as addressed in the plans and specifications.
- Requirements for project coordination meetings between the Applicant and its representatives, the Construction Manager, Excavation Contractor, remedial or environmental subcontractors, and other involved parties.
- Description of the reporting requirements for quality assurance activities including such items as daily summary reports, schedule of data submissions, inspection data sheets,

problem identification and corrective measures reports, evaluation reports, acceptance reports, and final documentation.

- Description of the final documentation retention provisions.

4.1.4 Soil/Materials Management Plan (SoMP)

The SoMP is included as section 5.4 and includes detailed plans for managing all soils/materials that are disturbed at the Site, including excavation, handling, storage, transport and disposal. It also includes all of the controls that will be applied to these efforts to assure effective, nuisance-free performance in compliance with all applicable Federal, State and local laws and regulations, and the approved BUD.

4.1.5 Storm-Water Pollution Prevention Plan (SWPPP)

The SWPPP(General Permit No. GP-0-08-001) is included in Appendix 10. The SWPPP addresses requirements of New York State Storm-Water Management Regulations including physical methods to control and/or divert surface water flows and to limit the potential for erosion and migration of Site soils, via wind or water.

The erosion and sediment controls included in the SWPPP are in conformance with requirements presented in the New York State Guidelines for Urban Erosion and Sediment Control and were thoroughly analyzed during the SEQRA EIS process.

4.1.6 Community Air Monitoring Plan (CAMP)

A copy of the CAMP for the site is included as Appendix 7.

4.1.7 Contractors Site Operations Plan (SOP);

A copy of the SOP is included as Appendix 11 (to be provided by the contractor for the Site). The Remediation Contractor will prepare a Contractors SOP prior to the start of construction. The Environmental/Remediation Engineer, SESI, will review this SOP for completeness and ensure it includes the following items, at a minimum:

- Anticipated hours of work;
- Site security procedures;
- Traffic control measures; and
- Planned contingency actions.

The Remediation Engineer will review all plans and submittals for this remedial project (including those listed above and contractor and sub-contractor document submittals) and confirm that they are in compliance with this RAWP. All remedial documents will be submitted to NYSDEC and NYSDOH in a timely manner and prior to the start of work.

4.1.8 Community Participation Plan

A certification of mailing will be sent by the Volunteer to the NYSDEC project manager following the distribution of all Fact Sheets and notices that includes: (1) certification that the Fact Sheets were mailed, (2) the date they were mailed; (3) a copy of the Fact Sheet, (4) a list of recipients (contact list); and (5) a statement that the repository was inspected on _ and that it contained all of applicable project documents.

No changes will be made to approved Fact Sheets authorized for release by NYSDEC without written consent of the NYSDEC. No other information, such as brochures and flyers, will be included with the Fact Sheet mailing.

The updated Community Participation Plan for this project is attached in Appendix 6.

Document repositories have been established at the following locations and contain all applicable project documents:

Crawford Public Library	Hours
Reference Desk	Mon., Tues., Thurs., Fri. 10:00 am – 6:00 pm
393 Broadway	Wednesday - 10:00 am – 7:30 pm
Monticello, NY 12701	Saturday - 11:00 am – 3:00 pm
	Sunday - Closed

NYSDEC Region 3
New Paltz Office
Attn: Mike Knipfing
21 South Putt Corners Rd.
New Paltz, New York 12561
(845) 256-3154

4.2 GENERAL REMEDIAL CONSTRUCTION INFORMATION

4.2.1 Project Organization

Concord Associates, LP is the BCP Volunteer and redeveloper of the Site. SESI is the environmental consultant for Concord Associates. A table summarizing the various personnel associated with the project is included as Table 7.

Resumes of key personnel involved in the Remedial Action are included in Appendix 12.

4.2.2 Remedial Engineer

The Remedial Engineer for this project will be Michael St. Pierre. The Remedial Engineer is a registered professional engineer licensed by the State of New York. The Remedial Engineer will have primary direct responsibility for implementation of the remedial program for the Concord Hotel and Resort Site (NYSDEC BCA Index No. W3-1004-04-06 Site No. C353008). The Remedial Engineer will certify in the Final Engineering Report that the remedial activities were observed by qualified environmental professionals under his supervision and that the remediation requirements set forth in the Remedial Action Work Plan and any other relevant provisions of ECL 27-1419 have been achieved in full conformance with that Plan. Other Remedial Engineer certification requirements are listed later in this RAWP.

The Remedial Engineer will coordinate the work of other contractors and subcontractors involved in all aspects of remedial construction, including soil excavation, stockpiling, characterization, removal and disposal, air monitoring, emergency spill response services, import of back fill material, and management of waste transport and disposal. The Remedial Engineer will be responsible for all appropriate communication with NYSDEC and NYSDOH.

The Remedial Engineer will review all pre-remedial plans submitted by contractors for compliance with this Remedial Action Work Plan and will certify compliance in the Final Remediation Report.

The Remedial Engineer will provide the certifications listed in the Final Engineering Report.

4.2.3 Remedial Action Construction Schedule

A remedial action construction schedule is included as Table 8. The schedule includes estimates of time required to complete the activities associated with the remedial action. It is based on elapsed time from receipt of NYSDEC approval. Once NYSDEC approves this

RAWP, an updated schedule showing actual dates will be provided to the NYSDEC as an addendum to this plan.

4.2.4 Work Hours

The hours for operation of remedial construction will conform to the Town of Thompson Department of Buildings construction code requirements or according to specific variances issued by that agency. DEC will be notified by the Applicant of any variances issued by the Department of Buildings.

4.2.5 Site Security

A description of the proposed site security measures will be included in the Site Operations Plan (see Section 4.1.7). The Site is secured with fences and locked gates. Access to Site is controlled by a security guard and local police patrolling the area.

4.2.6 Traffic Control

A description of the proposed traffic control measures will be included in the Site Operations Plan (see Section 4.1.7). Currently, all traffic is directed down the main access road to the Site - Concord Road - and this will likely continue.

4.2.7 Contingency Plan

A description of the proposed contingency measures will be included in the Site Operations Plan (see Section 4.1.7).

4.2.8 Worker Training and Monitoring

Worker training and monitoring requirements will be outlined in the CQAP (see Section 4.1.3).

4.2.9 Agency Approvals

The Applicant has addressed all SEQRA requirements for this Site. All permits or government approvals required for remedial construction have been, or will be, obtained prior to the start of remedial construction. The IRM workplan associated with OU-1A was approved by NYSDEC in a letter, dated September 30, 2008.

The planned end use for the Site is in conformance with the current zoning for the property as determined by the Town of Thompson Department of Planning

4.2.10 NYSDEC BCP Signage

A project sign has been erected at the main entrance to the Site. The sign indicates that the project is being performed under the New York State Brownfield Cleanup Program.

Pre-Construction Meeting with NYSDEC

A pre-construction meeting will be held with NYSDEC prior to the start of major remedial construction activities.

Emergency Contact Information

An emergency contact sheet with names and phone numbers is included in Table 10. That document will define the specific project contacts for use by NYSDEC and NYSDOH in the case of a day or night emergency.

Remedial Action Costs

The estimated costs of the Remedial Action for both the Track 1 and Track 4 alternatives are included in Table 11. An itemized and detailed summary of costs for all remedial activity will be included in the FER. This will be revised based on actual costs and submitted as an Appendix to the Final Remediation Report.

4.3 SITE PREPARATION

4.3.1 Mobilization

Mobilization tasks will include:

- Construction of temporary facilities and utilities;
- Set-up of construction equipment and facilities;
- Construction of fencing and barriers;
- Construction of erosion control measures; and
- Construction of decontamination and materials staging areas.

4.3.2 Erosion and Sedimentation Controls

Erosion and sediment control measures are outlined in the SWPPP (see Section 4.1.5).

4.3.3 Stabilized Construction Entrance(s)

Traffic control, and measures to prevent cross-contamination of construction equipment, will be addressed in the Site Operations Plan (see Section 4.1.7).

4.3.4 Utility Marker and Easements Layout

The Applicant and its contractors will be solely responsible for the identification of utilities that might be affected by work under the RAWP and implementation of all required, appropriate, or necessary health and safety measures during performance of work under this RAWP. The Applicant and its contractors are solely responsible for safe execution of all invasive and other work performed under this RAWP. The Applicant and its contractors will obtain any local, State or Federal permits or approvals pertinent to such work that may be required to perform work under this RAWP. Approval of this RAWP by NYSDEC does not constitute satisfaction of these requirements.

The presence of utilities and easements on the Site has been investigated by the Remedial Engineer. It has been determined that no risk or impediment to the planned work under this Remedial Action Work Plan is posed by utilities or easements on the Site.

4.3.5 Sheeting and Shoring

Appropriate management of structural stability of on-Site or off-Site structures during on-Site activities include excavation is the sole responsibility of the Applicant and its contractors. The Applicant and its contractors will be solely responsible for safe execution of all invasive and other work performed under this Plan. The Applicant and its contractors will obtain any local, State or Federal permits or approvals that may be required to perform work under this Plan. Further, the Applicant and its contractors are solely responsible for the implementation of all required, appropriate, or necessary health and safety measures during performance of work under the approved Plan.

4.3.6 Equipment and Material Staging

Equipment and material staging areas are expected to be relocated throughout the site during remedial construction. A detailed description of these areas will be included in the Site Operations Plan (see Section 4.1.7).

4.3.7 Decontamination Area

The decontamination area construction and operational requirements are outlined in the HASP.

4.3.8 Site Fencing

A construction safety fence will be installed around the entire perimeter of the site. Access through gates will be provided at various points as required by the Applicant and its contractors. These gates will be locked during non-construction hours.

4.3.9 Demobilization

Demobilization will include the following :

- Restoration of areas that may have been disturbed to accommodate support areas (e.g., staging areas, decontamination areas, storage areas, temporary water management area[s], and access area);
- Removal of temporary access areas (whether on-Site or off-Site) and restoration of disturbed access areas to pre-remediation conditions;
- Removal of sediment and erosion control measures and disposal of materials in accordance with acceptable rules and regulations;
- Equipment decontamination;
- General refuse disposal.

4.4 REPORTING

All daily and monthly Reports will be included in the Final Engineering Report.

4.4.1 Daily Reports

Daily reports will be submitted to NYSDEC and NYSDOH Project Managers by the end of each day following the reporting period and will include:

- An update of progress made during the reporting day;
- Locations of work and quantities of material imported and exported from the Site;
- References to alpha-numeric map for Site activities;
- A summary of any and all complaints with relevant details (names, phone numbers);
- A summary of CAMP finding, including excursions;
- An explanation of notable Site conditions.

Daily reports are not intended to be the mode of communication for notification to the NYSDEC of emergencies (accident, spill), requests for changes to the RAWP or other sensitive or time critical information. However, such conditions must also be included in the daily reports. Emergency conditions and changes to the RAWP will be addressed directly to NYSDEC Project Manager via personal communication.

Daily Reports will include a description of daily activities keyed to an alpha-numeric map for the Site that identifies work areas. These reports will include a summary of air sampling results, odor and dust problems and corrective actions, and all complaints received from the public.

A Site map that shows a predefined alpha-numeric grid for use in identifying locations described in reports submitted to NYSDEC is attached in Figure7.

The NYSDEC assigned project number will appear on all reports.

4.4.2 Monthly Reports

Monthly reports will be submitted to NYSDEC and NYSDOH Project Managers within one week following the end of the month of the reporting period and will include:

- Activities relative to the Site during the previous reporting period and those anticipated for the next reporting period, including a quantitative presentation of work performed (i.e. tons of material exported and imported, etc.);
- Description of approved activity modifications, including changes of work scope and/or schedule;
- Sampling results received following internal data review and validation, as applicable; and,
- An update of the remedial schedule including the percentage of project completion, unresolved delays encountered or anticipated that may affect the future schedule, and efforts made to mitigate such delays.

4.4.3 Other Reporting

Photographs will be taken of all remedial activities and submitted to NYSDEC in digital (JPEG) format. Photos will illustrate all remedial program elements and will be of acceptable quality. Representative photos of the Site prior to any Remedial Actions will be provided. Representative photos will be provided of each contaminant source, source area and Site structures before, during and after remediation. Photos will be submitted to NYSDEC on CD or other acceptable electronic media and will be sent to NYSDEC's Project Manager (2 copies) and to NYSDOH's Project Manager (1 copy). CD's will have a label and a general file inventory structure that separates photos into directories and sub-directories according to logical Remedial Action components. A photo log keyed to photo file ID numbers will be prepared to provide explanation for all representative photos. For larger and longer projects, photos should be submitted on a monthly basis or another agreed upon time interval.

Job-site record keeping for all remedial work will be appropriately documented. These records will be maintained on-Site at all times during the project and be available for inspection by NYSDEC and NYSDOH staff.

4.4.4 Complaint Management Plan

A public information board will be constructed at the perimeter of the Site. This information board will contain the phone number of the Applicant where complaints may be directed. General information notices to the public will also be posted on this board for their benefit.

4.4.5 Deviations from the Remedial Action Work Plan

If there are any deviations from the RAWP, the following steps will be taken:

- Reasons for deviating from the approved RAWP will be identified and communicated directly to the NYSDEC Project Manager;
- All deviations will be communicated verbally and in writing (by letter or email) to the NYSDEC Project Manager;
- The deviations will be implemented based on verbal or written approval of the NYSDEC Project Manger. All verbal approvals will be followed-up in writing.
- The effect of the deviations on the overall remedy will be described/addressed in the Final Engineering Report.

5.0 REMEDIAL ACTION: MATERIAL REMOVAL FROM SITE

Removal of all contaminated media (soil, water, structures, etc) under the Remedial Action will be implemented in accordance with the site-specific Construction Quality Assurance Plan (CQAP) and the Quality Assurance Project Plan (QAPP). The CQAP is included as Appendix 9 and includes a description and identification (including a map) of: the location of remedial treatment units; the volume of each environmental medium to be remediated; the location, depth and concentration of all contaminants in excess of the remediation standard; sample locations, depths and parameters for all post-construction samples. The Quality Assurance Project Plan describing the proposed sampling and analytical methods and a list of all required permits (or substantive permit requirements) is included as Appendix 8.

A plan depicting the surface topography and the locations where the excavation activities will be carried out are included as Figures 11 and 12, respectively. A summary of the location, depth and concentration of all contaminants in excess of the remediation standard are included in Table 12.

5.1 SOIL CLEANUP OBJECTIVES

The Soil Cleanup Objectives for this Site are listed in Table 6.

Soil and materials management on-Site and off-Site will be conducted in accordance with the Soil Management Plan as described below.

Table 3 summarizes all soil samples that exceed the SCOs proposed for this Remedial Action. A spider map that shows all soil samples that exceed the SCOs proposed for this Remedial Action is shown in Figure 8.

UST closures will, at a minimum, conform to criteria defined in 6 NYCRR Part 375-1.8(b).

5.2 REMEDIAL PERFORMANCE EVALUATION (POST EXCAVATION END-POINT SAMPLING)

5.2.1 End-Point Sampling Frequency

For all excavations, post-excavation soil and groundwater samples will be collected in accordance with Section 5.4 of DER-10.

5.2.2 Methodology

Soil samples will be collected in accordance with the QAPP using disposable gloves/trowels or dedicated, decontaminated stainless steel spoons. Groundwater samples will be collected from open excavations either using disposable bailers or, where appropriate, directly into the sampling jars.

5.2.3 Reporting of Results

The samples will either be submitted to a NYSDOH certified laboratory. The results will be reported in accordance with NYSDEC requirements for Category B data deliverables (as outlined in DER-10).

5.2.4 QA/QC

Collection of QA/QC samples to evaluate potential cross-contamination from sampling equipment and during shipment of samples and repeatability of laboratory analytical practices will be in accordance with the QAPP included as Appendix 8. Field blanks, trip blanks and duplicate samples associated with daily sampling activities will be collected as a part of the QA/QC practices.

5.2.5 DUSR

To ensure that the field sampling and laboratory analytical practices are acceptable, the data associated with all the samples will be validated by a third party (in accordance with requirements of DER-10). The validation approach and results will be presented in a DUSR to be included in the FER.

5.2.6 Reporting of End-Point Data in FER

The FER will include a table of end point data with highlights or a summary of exceedances of SCOs. A spider map showing all SCO exceedances will also be presented in the FER .

Chemical labs used for all end-point sample results and contingency sampling will be NYSDOH ELAP certified.

End point sampling, including bottom and side-wall sampling, will be performed in accordance with DER-10 sample frequency requirements. Side-wall samples will be collected a minimum of every 30 linear feet. Bottom samples will be collected at a rate of one for every 900 square feet. For relatively large excavations an alternate reduced sampling frequency as approved by NYSDEC will be utilized. The FER will provide a tabular and map summary of all end-point sample results and exceedances of SCOs.

5.3 ESTIMATED MATERIAL REMOVAL QUANTITIES

Source removal excavation activities and other soil excavation will be implemented during the course of the redevelopment activities within the proposed building footprints and to a limited extent within roadway and landscaped areas. A plan depicting the cut and fill thicknesses is included as Figure 13. The estimated quantity of soil/fill to be removed from the Site is 22,000 tons. The estimated quantity of soil to be imported into the Site for backfill and cover soil is 17,000 tons. Concord Associates plans to reuse most of the excavated soil from OU-1A, below the "cap" (in accordance with the Site-specific Beneficial Use Determination pending approval by the NYSDEC). The estimated quantity of soil/fill expected to be reused/relocated on Site is 20,000 tons.

5.4 SOIL/MATERIALS MANAGEMENT PLAN

Approximately 22,000 tons of material is required to be excavated during construction activities. The required fill will either consist of previously excavated soil in accordance with the Site-specific Beneficial Use Determination or imported clean fill. Refer to Figures 5 and 11 for the Site Cross Sections and the anticipated cut/fill analysis. A Site Management Plan will be developed after implementation of the remedy to manage any residual contaminated soils in the future.

5.4.1 Soil Screening Methods

Visual, olfactory and PID soil screening and assessment will be performed by a qualified environmental professional during all remedial and development excavations into known or potentially contaminated material (Residual Contamination Zone). Soil screening will be performed regardless of when the invasive work is done and will include all excavation and invasive work performed during the remedy and during development phase, such as excavations for foundations and utility work, prior to issuance of the COC.

All primary contaminant sources (including but not limited to tanks and hotspots) identified during Site Characterization, Remedial Investigation, and Remedial Action will be surveyed by a surveyor licensed to practice in the State of New York. This information will be provided on maps in the Final Engineering Report.

Screening will be performed by qualified environmental professionals. Resumes will be provided for all personnel responsible for field screening (i.e. those representing the Remedial Engineer) of invasive work for unknown contaminant sources during remediation and development work.

5.4.2 Stockpile Methods for Contaminated Soils

Stockpiles will be inspected at a minimum once each week and after every storm event. Results of inspections will be recorded in a logbook and maintained at the Site and available for inspection by NYSDEC.

Stockpiles will be kept covered at all times with appropriately anchored tarps. Stockpiles will be routinely inspected and damaged tarp covers will be promptly replaced.

Soil stockpiles will be continuously encircled with silt fences. Hay bales will be used as needed near catch basins, surface waters and other discharge points.

A dedicated water truck equipped with a water cannon will be available on-Site, as needed, for dust control.

5.4.3 Materials Excavation and Load Out

The Remediation Engineer or a qualified environmental professional under his/her supervision will oversee all invasive work and the excavation and load-out of all excavated material.

The Applicant and its contractors are solely responsible for safe execution of all invasive and other work performed under this Plan.

The presence of utilities and easements on the Site has been investigated by the Remedial Engineer. It has been determined that no risk or impediment to the planned work under this Remedial Action Work Plan is posed by utilities or easements on the Site.

Loaded vehicles leaving the Site will be appropriately lined, tarped, securely covered, manifested, and placarded in accordance with appropriate Federal, State, local, and NYSDOT requirements (and all other applicable transportation requirements).

A truck wash associated with construction activities adjacent to OU-1A is currently operational. The Remediation Engineer will be responsible for ensuring that all outbound trucks will be washed at the truck wash before leaving the Site until the remedial construction is complete.

Locations where vehicles enter or exit the Site will be inspected daily for evidence of off-Site sediment tracking.

The Remediation Engineer will ensure that all egress points for truck and equipment transport from the Site will be clean of dirt and other materials derived from the Site during Site remediation and development. Cleaning of the adjacent streets will be performed as needed to maintain a clean condition with respect to Site -derived materials.

The Applicant and associated parties preparing the remedial documents submitted to the State, and parties performing this work, are completely responsible for the safe performance of all invasive work, the structural integrity of excavations, and for structures that may be affected by excavations (such as building foundations and bridge footings).

The Remedial Engineer will ensure that Site development activities will not interfere with, or otherwise impair or compromise, remedial activities proposed in this Remedial Action Work Plan.

Each hotspot and structure to be remediated (USTs, vaults and associated piping, transformers, etc.) will be removed and end-point remedial performance sampling completed before excavations related to Site development commence proximal to the hotspot or structure.

Development-related grading cuts and fills will not be performed without NYSDEC approval and will not interfere with, or otherwise impair or compromise, the performance of remediation required by this plan.

Mechanical processing of historical fill and contaminated soil on-Site is prohibited.

All primary contaminant sources (including but not limited to tanks and hotspots) identified during Site Characterization, Remedial Investigation, and Remedial Action will be surveyed by a surveyor licensed to practice in the State of New York. The survey information will be shown on maps to be reported in the Final Engineering Report. End point sampling of these source removal areas will be documented in the FER.

5.4.4 Materials Transport Off-Site

All transport of materials will be performed by licensed haulers in accordance with appropriate local, State, and Federal regulations, including 6 NYCRR Part 364. Haulers will be appropriately licensed and trucks properly placarded.

Truck transport routes will be included in the SOP. All trucks loaded with Site materials will exit the vicinity of the Site using only these approved truck routes.

Proposed in-bound and out-bound truck routes to the Site will take into account: (a) limiting transport through residential areas and past sensitive sites; (b) use of city mapped truck routes; (c) prohibiting off- Site queuing of trucks entering the facility; (d) limiting total distance to major highways; (e) promoting safety in access to highways; (f) overall safety in transport; and (g) community input, which was sought and obtained during the SEQRA EIS process

Trucks will be prohibited from stopping and idling in the neighborhood outside the project Site.

Egress points for truck and equipment transport from the Site will be kept clean of dirt and other materials during Site remediation and development.

Queuing of trucks will be performed on-Site in order to minimize off-Site disturbance. Off-Site queuing will be prohibited.

Material transported by trucks exiting the Site will be secured with tight-fitting covers. Loose-fitting canvas-type truck covers will be prohibited. If loads contain wet material capable of producing free liquid, truck liners will be used.

All truck tires will be washed prior to leaving the Site. Truck wash waters will be collected and disposed of off-Site in an appropriate manner.

5.4.5 Materials Disposal Off-Site

The disposal locations are included in the CQAP. JM Associates, one of the environmental contractors for the Site, plans to dispose of impacted soil at Deep Green of New York (TPST Soil Recyclers of New York, Inc.), located at 1106 River Road, New Windsor, New York. Disposal locations established at a later date will be reported to the NYSDEC Project Manager.

The total quantity of material expected to be disposed off-Site is 2,400 tons.

All soil/fill/solid waste excavated and removed from the Site will be treated as contaminated and regulated material and will be disposed in accordance with all local, State (including 6NYCRR Part 360) and Federal regulations. If disposal of soil/fill from this Site is proposed for unregulated disposal (i.e. clean soil removed for development purposes), a formal request with an associated plan will be made to NYSDEC's Project Manager. Unregulated off-Site management of materials from this Site will not be undertaken without formal NYSDEC approval.

Material that does not meet Track 1 unrestricted SCOs is prohibited from being taken to a New York State recycling facility (6NYCRR Part 360-16 Registration Facility).

The following documentation will be obtained and reported by the Remedial Engineer for each disposal location used in this project to fully demonstrate and document that the disposal of material derived from the Site conforms with all applicable laws: (1) a letter from the Remedial Engineer or BCP Applicant to the receiving facility describing the material to be disposed and requesting formal written acceptance of the material. This letter will state that material to be disposed is contaminated material generated at an environmental remediation Site in New York State. The letter will provide the project identity and the name and phone number of the Remedial Engineer. The letter will include as an attachment a summary of all chemical data for the material being transported (including Site Characterization data); and (2) a letter from all receiving facilities stating it is in receipt of the correspondence (above) and is approved to accept the material. These documents will be included in the FER.

Non-hazardous historic fill and contaminated soils taken off-Site will be handled, at minimum, as a Municipal Solid Waste per 6NYCRR Part 360-1.2

Historical fill and contaminated soils from the Site are prohibited from being disposed at Part 360-16 Registration Facilities (also known as Soil Recycling Facilities).

Soils that are contaminated but non-hazardous and are being removed from the Site are considered by the Division of Solid & Hazardous Materials (DSHM) in NYSDEC to be Construction and Demolition (C/D) materials with contamination not typical of virgin soils. These soils may be sent to a permitted Part 360 landfill. They may be sent to a permitted C/D processing facility without permit modifications only upon prior notification of NYSDEC Region 2 DSHM. This material is prohibited from being sent or redirected to a Part 360-16 Registration Facility. In this case, as dictated by DSHM, special procedures will include, at a minimum, a letter to the C/D facility that provides a detailed explanation that the material is derived from a DER remediation Site, that the soil material is contaminated and that it must not be redirected to on-Site or off-Site Soil Recycling Facilities. The letter will provide the project identity and the name and phone number of the Remedial Engineer. The letter will include as an attachment a summary of all chemical data for the material being transported.

The Final Engineering Report will include an accounting of the destination of all material removed from the Site during this Remedial Action, including excavated soil, contaminated soil, historic fill, solid waste, and hazardous waste, non-regulated material, and fluids. Documentation associated with disposal of all material must also include records and approvals for receipt of the material. This information will also be presented in a tabular form in the FER.

Bill of Lading system or equivalent will be used for off-Site movement of non-hazardous wastes and contaminated soils. This information will be reported in the Final Engineering Report.

Hazardous wastes derived from on-Site will be stored, transported, and disposed of in full compliance with applicable local, State, and Federal regulations.

Appropriately licensed haulers will be used for material removed from this Site and will be in full compliance with all applicable local, State and Federal regulations.

Waste characterization will be performed for off-Site disposal in a manner suitable to the receiving facility and in conformance with applicable permits. Sampling and analytical methods, sampling frequency, analytical results and QA/QC will be reported in the FER. All data available for soil/material to be disposed at a given facility must be submitted to the disposal facility with suitable explanation prior to shipment and receipt.

5.4.6 Materials Reuse On-Site

Soil excavated during the remedial implementation and site redevelopment, based on known information about on-site contamination distribution and field screening results, will be managed as three waste streams:

1. Unrestricted on-site reuse (material below Restricted Use-Protection of Groundwater and Restricted Use-Commercial SCOs);
2. On-site reuse under an impermeable cap (soil that is not grossly impacted and soil that is not impacted at concentrations that significantly exceed Restricted Use-Commercial) in accordance with the pending BUD approval; and
3. Off-site disposal (grossly impacted soil and soil that is impacted at concentrations that significantly exceed Restricted Use-Commercial)

Chemical criteria for on-Site reuse and imported material are listed in Table 6. The logistics of the soil handling (i.e., location and size of the soil staging areas) will be included in the SOP.

The Remedial Engineer will ensure that procedures defined for materials reuse in this RAWP are followed and that unacceptable material will not remain on-Site.

Acceptable demolition material proposed for reuse on-Site, if any, will be sampled for asbestos. Organic matter (wood, roots, stumps, etc.) or other solid waste derived from clearing and grubbing of the Site is prohibited for reuse on-Site.

Contaminated on-Site material, including historic fill and contaminated soil, removed for grading or other purposes will not be reused within a cover soil layer, within landscaping berms, or as backfill for subsurface utility lines. This will be outlined in the final Site Management Plan.

5.4.7 Fluids Management

All liquids to be removed from the Site, including dewatering fluids, will be handled, transported and disposed in accordance with applicable local, State, and Federal regulations. Liquids discharged into the sewer system will be addressed through approval by local utility authority and NYSDEC. Dewatered fluids will not be recharged back to the land surface or subsurface of the Site.

Water generated during remedial construction will not be discharged to surface waters (i.e. a local pond, stream or river) without a SPDES permit.

5.4.8 Demarcation

A land survey will be performed by a New York State licensed surveyor, of areas that require "clean cover soil," after the completion of related construction activities. The survey will define the top elevation of residual contaminated soils. A physical demarcation layer, consisting of orange snow fencing material or equivalent material will be placed, just below the "clean soil cover" in landscaped areas, to provide a visual reference. This demarcation layer will constitute the top of the 'Residuals Management Zone', the zone that requires adherence to special conditions for disturbance of contaminated residual soils defined in the Site Management Plan. The survey will measure the grade covered by the demarcation layer before the placement of cover soils, pavement and sub-soils, structures, or other materials. This survey and the demarcation layer placed on this grade surface will constitute the physical and written record of the upper surface of the 'Residuals Management Zone' in the Site Management Plan. A map showing the survey results will be included in the Final Remediation Report and the Site Management Plan.

5.4.9 Backfill from Off-Site Sources

A plan depicting the locations where soil backfilling operations will be required is included as Figure 14. For off-site non-virgin borrow material imported to be used on-site as backfill, one composite sample will be collected per 500 cubic yards of material from each source area. If more than 1,000 cubic yards of soil are borrowed from a given off-site non-virgin soil source area and both samples of the first 1,000 cubic yards meet the site-specific Restricted

Use SCOs, the sample frequency will be reduced to one composite for every 2,500 cubic yards of additional soils from the same source, up to 5,000 cubic yards. For borrow sources greater than 5,000 cubic yards, sampling frequency may be reduced to one sample per 5,000 cubic yards, provided all earlier samples met the site-specific Restricted Use SCOs. The samples will be analyzed for target compound list (TCL) volatile organic compounds (VOCs), TCL Semi-Volatile Organic Compounds (SVOCs), pesticides, PCBs, and TAL metals, including cyanide. The soil may be used as cover material provided that all parameters meet the site specific Restricted Use SCOs, per the NYSDEC regulatory requirements. A table summarizing the backfill sampling protocol is included as Table 13.

All materials proposed for import onto the Site, will meet the Commercial and Protection of Groundwater Soil Cleanup Objectives, will be approved by the Remedial Engineer and will be in compliance with provisions in this RAWP prior to receipt at the Site. Bills of Lading or equivalent documentation will be obtained to track the amount soil arriving onto the Site and verify the source of soil being imported.

Material from industrial sites, spill sites, other environmental remediation sites or other potentially contaminated sites will not be imported to the Site.

The Final Engineering Report will include the following certification by the Remedial Engineer: "I certify that all import of soils from off-Site, including source evaluation, approval and sampling, has been performed in a manner that is consistent with the methodology defined in the Remedial Action Work Plan".

All imported soils will meet NYSDEC approved backfill or cover soil quality objectives for this Site. These NYSDEC approved backfill or cover soil quality objectives are listed in Table 6. Non-compliant soils will not be imported onto the Site without prior approval by NYSDEC. Nothing in the approved Remedial Action Work Plan or its approval by NYSDEC will be construed as an approval for this purpose.

Soils that meet 'exempt' fill requirements under 6 NYCRR Part 360, but do not meet backfill or cover soil objectives for this Site, will not be imported onto the Site without prior approval by NYSDEC. Nothing in this Remedial Action Work Plan will be construed as an approval for this purpose.

Solid waste will not be imported onto the Site.

Trucks entering the Site with imported soils will be securely covered with tight fitting covers.

5.4.10 Stormwater Pollution Prevention Plan

A summary of the Stormwater Pollution Prevention Plan (SWPPP) (associated only with the on-site construction activities) that conforms to the requirements of NYSDEC Division of Water guidelines and NYS regulations has already been submitted to the NYSDEC and approved.

Barriers and hay bale checks will be installed and inspected once a week and after every storm event. Results of inspections will be recorded in a logbook and maintained at the Site and available for inspection by NYSDEC. All necessary repairs shall be made immediately.

Accumulated sediments will be removed as required to keep the barrier and hay bale check functional.

All undercutting or erosion of the silt fence toe anchor shall be repaired immediately with appropriate backfill materials.

Manufacturer's recommendations will be followed for replacing silt fencing damaged due to weathering.

Erosion and sediment control measures identified in the RAWP shall be observed to ensure that they are operating correctly. Where discharge locations or points are accessible, they shall be inspected to ascertain whether erosion control measures are effective in preventing significant impacts to receiving waters

Silt fencing or hay bales will be installed around the entire perimeter of the remedial construction area or as required by the SWPPP.

5.4.11 Contingency Plan

If underground tanks or other previously unidentified contaminant sources are found during on-Site remedial excavation or development related construction, sampling will be performed on product, sediment and surrounding soils, etc. Chemical analytical work will be for full scan parameters (TAL metals; TCL volatiles and semi-volatiles, TCL pesticides and PCBs). These analyses will not be limited to STARS parameters where tanks are identified without prior approval by NYSDEC. Analyses will not be otherwise limited without NYSDEC approval.

Identification of unknown or unexpected contaminated media identified by screening during invasive Site work will be promptly communicated by phone to NYSDEC's Project Manager. These findings will be also included in daily and periodic electronic media reports.

5.4.12 Community Air Monitoring Plan

A copy of the CAMP for the Site is included as Appendix 7. A map showing the location of fixed and mobile sampling stations is shown in Figure 15.

Exceedances observed in the CAMP will be reported to NYSDEC and NYSDOH Project Managers and included in the Daily Report.

5.4.13 Odor, Dust and Nuisance Control Plan

Odor, dust and nuisance control will be in accordance with the site specific Health and Safety Plan included as Appendix 7.

The Final Engineering Report will include the following certification by the Remedial Engineer: "I certify that all invasive work during the remediation and all invasive development work were conducted in accordance with dust and odor suppression methodology defined in the Remedial Action Work Plan."

5.4.13.1 Odor Control Plan

This odor control plan is designed to control emissions of nuisance odors off-Site. If nuisance odors are identified, work will be halted and the source of odors will be identified and corrected. Work will not resume until all nuisance odors have been abated. NYSDEC and NYSDOH will be notified of all odor events and of all other complaints about the project. Implementation of all odor controls, including the halt of work, will be the responsibility of the Applicant's Remediation Engineer, who is responsible for certifying the Final Engineering Report.

All necessary means will be employed to prevent on- and off-Site nuisances. At a minimum, procedures will include: (a) limiting the area of open excavations; (b) shrouding open excavations with tarps and other covers; and (c) using foams to cover exposed odorous soils. If odors develop and cannot be otherwise controlled, additional means to eliminate odor nuisances will include: (d) direct load-out of soils to trucks for off-Site disposal; (e) use of chemical deodorants in spray or misting systems; and, (f) use of staff to monitor odors in surrounding neighborhoods.

Where odor nuisances have developed during remedial work and cannot be corrected, or where the release of nuisance odors cannot otherwise be avoided due to on-Site conditions or close proximity to sensitive receptors, odor control will be achieved, as appropriate, by a combination of work stoppages, sheltering excavation and handling areas under tented containment structures equipped with appropriate air venting/filtering systems.

5.4.13.2 Dust Control Plan

A dust suppression plan that addresses dust management during invasive on-Site work, will include, at a minimum, the items listed below:

- Dust suppression will be achieved though the use of a dedicated on-Site water truck for road wetting. The truck will be equipped with a water cannon capable of spraying water directly onto off-road areas including excavations and stockpiles.
- Clearing and grubbing will be done in stages to limit the area of exposed, unvegetated soils vulnerable to dust production.
- Gravel will be used on roadways to provide a clean and dust-free road surface.
- On-Site roads will be limited in total area to minimize the area required for water truck sprinkling.

5.4.13.3 Other Nuisances

A plan for rodent control will be developed and utilized by the contractor prior to and during Site clearing and Site grubbing, and during all remedial work.

A plan will be developed and utilized by the contractor for all remedial work and will conform, at a minimum, to local noise control standards.

6.0 RESIDUAL CONTAMINATION TO REMAIN ON-SITE

Since residual contaminated soil and groundwater, and potentially soil vapor will exist beneath the Site after the remedy is complete, Engineering and Institutional Controls (ECs and ICs) are required to protect human health and the environment. These ECs and ICs are described in the sections to follow. Long-term management of EC/ICs and of residual contamination will be described in a Site specific Site Management Plan (SMP) that will be developed and included in the FER, and will run with the land in an environmental easement that must be implemented by all future owners of the site until such time as unrestricted Track 1 cleanup levels are achieved.

ECs will be implemented to protect public health and the environment by appropriately managing residual contamination. The Controlled Property (the Site) will have two (2) primary EC systems. These are: (1) a composite cover system consisting of asphalt covered roads, concrete covered sidewalks, concrete building slabs and "clean soil cover" in landscaped areas; and (2) Implementing a free product removal and "monitored natural attenuation" program, to monitor/address the free product and low level dissolved groundwater impacts. A plan depicting the locations of these EC systems is included as Figure 16.

The FER will report residual contamination on the Site in tabular and map form. This will include presentation of exceedances of both Track 1 and Track 4 SCOs.

7.0 ENGINEERING CONTROLS

7.1 COMPOSITE COVER SYSTEM

Exposure to residual contaminated soils will be prevented by an engineered, composite cover system that will be built on the Site. This composite cover system will be comprised of asphalt covered roads, concrete covered sidewalks, concrete building slabs and "clean soil cover" in landscaped areas.

The only two structures that will be located in OU-1A are a small portion of the casino and a portion of the future theater. A sub-grade parking level will be constructed beneath the casino. Because an air exchange system will be incorporated into the parking area to actively vent vehicle exhaust, a vapor intrusion mitigation system will not be incorporated into the concrete slab portion of the composite cover system in the casino area. Since the theater will not be included in the first phase of construction (refer to Figure 3), this portion of the composite cover system will consist of clean soil cover. As such, a vapor intrusion mitigation system will not be required at this time.

The Site Management Plan will outline required measures for future vapor intrusion mitigation construction. Vapor intrusion mitigation approaches will be incorporated into the design of the theater (and any future applicable structures) and may include enhanced HVAC ventilation/pressurization, sub-slab vapor barrier, passive sub-slab venting, active sub-slab venting/depressurization, or a combination of these measures. Details of the vapor intrusion engineering control will be submitted to the NYSDEC and NYSDOH for approval in a Remedial Design Document prior to construction of the theater structure, and documented in the FER upon completion of construction. In the event that the site redevelopment plan is modified after the first phase of construction (e.g. building locations are changed, new structures are added, etc.), the Site Management Plan will also outline provisions for any future soil vapor investigation activities that may be required prior to construction. Future soil vapor investigation activities (if required) will be performed in consultation with the NYSDEC and NYSDOH.

A diagram showing the design detail for each cover type for the first phase of construction is shown in Figure 17.

A map showing the aerial distribution of each of the cover types to be built during the first phase of construction at the Site is included in Figure 18.

A Soil and Underground Structure Management Plan will be included in the Site Management Plan and will outline the procedures to be followed in the event that the composite cover system and underlying residual contamination are disturbed after the Remedial Action is complete.

Maintenance of this composite cover system will be described in the Site Management Plan in the FER.

7.2 GROUNDWATER MONITORING SYSTEM

A network of groundwater monitoring wells (see Figure 19) will be utilized to monitor the groundwater quality and the free-phase product (suspected to be degraded #4 fuel oil) plume. As the dissolved groundwater impacts detected during the remedial investigation are relatively low and the free-phase product is relatively immobile (due to its high viscosity), a free-phase product recovery system (discussed below), long-term monitoring program with associated institutional controls will be a cost effective remedial alternative to address these impacts.

Specifically, the monitoring wells will be gauged for the presence/thickness of free-phase product annually. Groundwater samples will be collected annually, in accordance with requirement outlined in DER-10. The groundwater samples will be analyzed for VOCs, SVOCs and pesticides.

This monitoring protocol will be described in the Site Management Plan in the FER.

7.3 FREE-PHASE PRODUCT RECOVERY SYSTEM

The free-product recovery, from six strategically placed recovery wells (see Figure 16), will be undertaken utilizing a vacuum truck. The recovery events will be undertaken periodically, depending on the amount of free phase product and the recharge rates. Depending on the free-product yield during a given recovery event and subsequent strength of free-phase product flow into the recovery wells, the frequency of the recovery events will be determined.

7.3 CRITERIA FOR COMPLETION OF REMEDIATION/TERMINATION OF REMEDIAL SYSTEMS

Composite Cover System

The composite cover system is a permanent control and the quality and integrity of this system will be inspected at defined, regular intervals in perpetuity or until Track 1 cleanup standards are achieved.

Groundwater Monitoring

Groundwater monitoring activities to assess groundwater quality will continue, as determined by NYSDOH and NYSDEC, until residual groundwater concentrations are found to be below NYSDEC standards or have become asymptotic over an extended period. Monitoring will continue until permission to discontinue is granted in writing by NYSDEC and NYSDOH. Groundwater monitoring well gauging to monitor the mobility of the free-phase product will be undertaken at defined, regular intervals in perpetuity. These monitoring activities will be outlined in the Monitoring Plan of the SMP.

8.0 INSTITUTIONAL CONTROLS

After the remedy is complete, the Site will have residual contamination remaining in place. Engineering Controls (ECs) for the residual contamination have been incorporated into the remedy to render the overall Site remedy protective of public health and the environment. Two elements have been designed to ensure continual and proper management of residual contamination in perpetuity and/or until Track 1 cleanup objectives have been achieved: an Environmental Easement and a Site Management Plan. These elements are described in this Section. A Site -specific Environmental Easement will be recorded with Sullivan County to provide an enforceable means of ensuring the continual and proper management of residual contamination and protection of public health and the environment in perpetuity or until released in writing by NYSDEC through achievement of the Track 1 objectives. It requires that the grantor of the Environmental Easement and the grantor's successors and assigns adhere to all Engineering and Institutional Controls (ECs/ICs) placed on this Site by this NYSDEC-approved remedy. ICs provide restrictions on Site usage and mandate operation, maintenance, monitoring and reporting measures for all ECs and ICs. The Site Management Plan (SMP) will describe appropriate methods and procedures to ensure compliance with all ECs and ICs that are required by the Environmental Easement. Once the SMP has been approved by the NYSDEC, compliance with the SMP is required by the grantor of the Environmental Easement and grantor's successors and assigns.

8.1 ENVIRONMENTAL EASEMENT

An Environmental Easement, as defined in Article 71 Title 36 of the Environmental Conservation Law, is required when residual contamination is left on-Site after the Remedial Action is complete. If the Site will have residual contamination above the Track 1 SCOs after completion of all Remedial Actions then an Environmental Easement is required. As part of this remedy, an Environmental Easement approved by NYSDEC will be filed and recorded with the Sullivan County Clerk. The Environmental Easement will be submitted as part of the Final Engineering Report.

The Environmental Easement renders the Site a Controlled Property. The Environmental Easement will be recorded with the Sullivan County Clerk before the Certificate of Completion is issued by NYSDEC. A series of Institutional Controls are required under this remedy to implement, maintain and monitor these Engineering Control systems, prevent future exposure to residual contamination by controlling disturbances of the subsurface soil and restricting the use of the Site to commerical use only. These Institutional Controls are requirements or restrictions placed on the Site that are listed in, and required by, the Environmental Easement. Institutional Controls can, generally, be subdivided between controls that support Engineering Controls, and those that place general restrictions on Site usage or other requirements. Institutional Controls in both of these groups are closely integrated with the Site Management Plan, which provides all of the methods and procedures to be followed to comply with this remedy.

The Institutional Controls that support Engineering Controls are:

- Compliance with the Environmental Easement by the Grantee and the Grantee's successors and adherence of all elements of the SMP is required;
- All Engineering Controls must be operated and maintained as specified in this SMP;
- A composite cover system consisting of asphalt covered roads, concrete covered sidewalks, and concrete building slabs must be inspected, certified and maintained as required in the SMP;
- All Engineering Controls on the Controlled Property will be inspected and certified at a frequency and in a manner defined in the SMP;
- Groundwater, soil vapor and other environmental or public health monitoring will be performed as defined in the SMP;
- Data and information pertinent to Site Management for the Controlled Property will be reported at the frequency and in a manner to be defined in the SMP;
- On-Site environmental monitoring devices, including but not limited to, groundwater monitor wells and soil vapor probes, will be protected and replaced as necessary to ensure proper functioning in the manner specified in the SMP;
- Engineering Controls may not be discontinued without an amendment or extinguishment of the Environmental Easement.

Adherence to these Institutional Controls for the Site is mandated by the Environmental Easement and will be implemented under the Site Management Plan (discussed in the next section). The Controlled Property (Site) will also have a series of Institutional Controls in the form of Site restrictions and requirements. The Site restrictions that apply to the Controlled Property are:

- Vegetable gardens and farming on the Controlled Property are prohibited;
- Use of groundwater underlying the Controlled Property is prohibited without treatment rendering it safe for intended purpose;
- All future activities on the Controlled Property that will disturb residual contaminated material are prohibited unless they are conducted in accordance with the soil management provisions in the Site Management Plan;
- The Controlled Property may be used for restricted residential or commercial use only, provided the long-term Engineering and Institutional Controls included in the Site Management Plan are employed;
- The Controlled Property may not be used for a higher level of use, such as restricted residential use without an amendment or extinguishment of this Environmental Easement;
- Grantor agrees to submit to NYSDEC a written statement that certifies, under penalty of perjury, that: (1) controls employed at the Controlled Property are unchanged from the previous certification or that any changes to the controls were approved by the NYSDEC; and, (2) nothing has occurred that impairs the ability of the controls to protect public health and environment or that constitute a violation or failure to comply with the SMP. NYSDEC retains the right to access such Controlled Property at any time in order to evaluate the continued maintenance of any and all controls. This certification shall be submitted annually, or an alternate period of time that NYSDEC may allow. This annual statement must be certified by an expert that the NYSDEC finds acceptable.

8.2 SITE MANAGEMENT PLAN

Site Management is the last phase of remediation and begins with the approval of the Final Engineering Report and issuance of the Certificate of Completion (COC) for the Remedial Action. The Site Management Plan is submitted as part of the FER but will be written in a manner that allows its removal and use as a complete and independent document. Site Management continues in perpetuity or until released in writing by NYSDEC. The property owner is responsible to ensure that all Site Management responsibilities defined in the Environmental Easement and the Site Management Plan are performed.

The SMP is intended to provide a detailed description of the procedures required to manage residual contamination left in place at the Site following completion of the Remedial Action in accordance with the BCA with the NYSDEC, particularly as they pertain to the future phases of development construction proposed for the site. This includes: (1) development, implementation, and management of all Engineering and Institutional Controls; (2) development and implementation of monitoring systems and a Monitoring Plan; (3) development of a plan to operate and maintain any treatment, collection, containment, or recovery systems (including, where appropriate, preparation of an Operation and Maintenance Manual); (4) submittal of Site Management Reports, performance of inspections and certification of results, and demonstration of proper communication of Site information to NYSDEC; and (5) defining criteria for termination of treatment system operation.

To address these needs, this SMP will include four plans: (1) an Engineering and Institutional Control Plan for implementation and management of EC/ICs; (2) a Monitoring Plan for implementation of Site Monitoring; (3) an Operation and Maintenance Plan for implementation of remedial collection, containment, treatment, and recovery systems; and (4) a Site Management Reporting Plan for submittal of data, information, recommendations, and certifications to NYSDEC. The SMP will be prepared in accordance with the requirements in NYSDEC Draft DER-10 Technical Guidance for Site Investigation and Remediation, dated December 2002, and the guidelines provided by NYSDEC.

Site management activities, reporting, and EC/IC certification will be scheduled on a certification period basis. The certification period will be annually. The Site Management Plan will be based on a calendar year and will be due for submission to NYSDEC by March 1 of the year following the reporting period.

The Site Management Plan in the Final Remediation Report will include a monitoring plan for groundwater at the down-gradient Site perimeter to evaluate Site -wide performance of the remedy. Appropriately placed groundwater monitor wells will also be installed immediately down-gradient of all volatile organic carbon remediation areas for the purpose of evaluation of the effectiveness of the remedy that is implemented.

No exclusions for handling of residual contaminated soils will be provided in the Site Management Plan (SMP). All handling of residual contaminated material will be subject to provisions contained in the SMP.

9.0 FINAL ENGINEERING REPORT

A Final Engineering Report (FER) and draft Certificate of Completion (COC) will be submitted to NYSDEC following implementation of the Remedial Action defined in this RAWP. The FER provides the documentation that the remedial work required under this RAWP has been completed and has been performed in compliance with this plan. The FER will provide a comprehensive account of the locations and characteristics of all material removed from the Site including the surveyed map(s) of all sources. The Final Engineering Report will include as-built drawings for all constructed elements, certifications, manifests, bills of lading as well as the complete Site Management Plan (formerly the Operation and Maintenance Plan). The FER will provide a description of the changes in the Remedial Action from the elements provided in the RAWP and associated design documents. The FER will provide a tabular summary of all performance evaluation sampling results and all material characterization results and other sampling and chemical analysis performed as part of the Remedial Action. The FER will provide test results demonstrating that all mitigation and remedial systems are functioning properly. The FER will be prepared in conformance with DER-10.

Where determined to be necessary by NYSDEC, a Financial Assurance Plan will be required to ensure the sufficiency of revenue to perform long-term operations, maintenance and monitoring tasks defined in the Site Management Plan and Environmental Easement. This determination will be made by NYSDEC in the context of the Final Engineering Report review.

The Final Remediation Report will include written and photographic documentation of all remedial work performed under this remedy.

The FER will include an itemized tabular description of actual costs incurred during all aspects of the Remedial Action.

The FER will provide a thorough summary of all residual contamination left on the Site after the remedy is complete. Residual contamination includes all contamination that exceeds the Track 1 Unrestricted Use SCO in 6NYCRR Part 375-6. A table that shows exceedances from Track 1 Unrestricted SCOs for all soil/fill remaining at the Site after the Remedial Action and a map that shows the location and summarizes exceedances from Track 1 Unrestricted SCOs for all soil/fill remaining at the Site after the Remedial Action will be included in the FER.

The FER will provide a thorough summary of all residual contamination that exceeds the SCOs defined for the Site in the RAWP and must provide an explanation for why the material was not removed as part of the Remedial Action. A table that shows residual contamination in excess of Site SCOs and a map that shows residual contamination in excess of Site SCOs will be included in the FER.

The Final Engineering Report will include an accounting of the destination of all material removed from the Site, including excavated contaminated soil, historic fill, solid waste, hazardous waste, non-regulated material, and fluids. Documentation associated with disposal of all material must also include records and approvals for receipt of the material. It will provide an accounting of the origin and chemical quality of all material imported onto the Site.

Before approval of a FER and issuance of a Certificate of Completion, all project reports must be submitted in digital form on electronic media (PDF).

9.1 CERTIFICATIONS

The following certification will appear in front of the Executive Summary of the Final Engineering Report. The certification will be signed by the Remedial Engineer Michael St. Pierre who is a Professional Engineer registered in New York State. This certification will be appropriately signed and stamped. The certification will include the following statements:

I, __ Michael St. Pierre ______, am currently a registered professional engineer licensed by the State of New York. I had primary direct responsibility for implementation of the remedial program for the Concord Hotel and Resort Site (NYSDEC BCA Index No. W3-1004-04-06 Site No. C353008).

I certify that the Site description presented in this FER is identical to the Site descriptions presented in the Environmental Easement, the Site Management Plan, and the Brownfield Cleanup Agreement for Concord Hotel and Resort and related amendments.

I certify that the Remedial Action Work Plan dated September 2008 Stipulations approved by the NYSDEC were implemented and that all requirements in those documents have been substantively complied with.

I certify that the remedial activities were observed by qualified environmental professionals under my supervision and that the remediation requirements set forth in the Remedial Action Work Plan and any other relevant provisions of ECL 27-1419 have been achieved.

I certify that all use restrictions, Institutional Controls, Engineering Controls, and all operation and maintenance requirements applicable to the Site are contained in an Environmental Easement created and recorded pursuant ECL 71-3605 and that all affected local governments, as defined in ECL 71-3603, have been notified that such easement has been recorded. A Site Management Plan has been submitted by the Applicant for the continual and proper operation, maintenance, and monitoring of all Engineering Controls employed at the Site, including the proper maintenance of all remaining monitoring wells, and that such plan has been approved by the NYSDEC.

I certify that the export of all contaminated soil, fill, water or other material from the property was performed in accordance with the Remedial Action Work Plan, and were taken to facilities licensed to accept this material in full compliance with all Federal, State and local laws.

I certify that all import of soils from off-Site, including source approval and sampling, has been performed in a manner that is consistent with the methodology defined in the Remedial Action Work Plan.

I certify that all invasive work during the remediation and all invasive development work were conducted in accordance with dust and odor suppression methodology and soil screening methodology defined in the Remedial Action Work Plan.

I certify that all information and statements in this certification are true. I understand that a false statement made herein is punishable as Class "A" misdemeanor, pursuant to Section 210.45 of the Penal Law.

It is a violation of Article 130 of New York State Education Law for any person to alter this document in any way without the express written verification of adoption by any New York State licensed engineer in accordance with Section 7209(2), Article 130, New York State Education Law.

10.0 SCHEDULE

A schedule of Remedial Actions is included as Table 8. The schedule is broken down into work elements and includes estimated dates for performance of work and deliverables.

CONCORD HOTEL AND RESORT

SULLIVAN COUNTY, NEW YORK

Remedial Action Work Plan

Operable Unit 1A Main Hotel Area

NYSDEC BCP Number: C353008

Prepared for:

CONCORD ASSOCIATES
115 STEVENS AVENUE
VALHALLA, NEW YORK 10595

Prepared by:

SESI CONSULTING ENGINEERS, PC
12A MAPLE AVENUE, PINE BROOK, NJ 07058
Ph: (973) 808 - 9050

OCTOBER 2008

CERTIFICATIONS

I, ___Michael St. Pierre_____________________, am currently a registered professional engineer licensed by the State of New York. I have primary direct responsibility for implementation of the remedial program for the Concord Hotel and Resort Site (NYSDEC BCA Index No. W3-1004-04-06 Site No. C353008).

I certify that the Site description presented in this RAWP is identical to the Site descriptions presented in the Brownfield Cleanup Agreement for Concord Hotel and Resort and related amendments.

I certify that this plan includes proposed use restrictions, Institutional Controls, Engineering Controls, and plans for all operation and maintenance requirements applicable to the Site and provision for development of an Environmental Easement to be created and recorded pursuant ECL 71-3605. This RAWP requires that all affected local governments, as defined in ECL 71-3603, will be notified that such Easement has been recorded. This RAWP requires that a Site Management Plan must be submitted by the Applicant for the continual and proper operation, maintenance, and monitoring of all Engineering Controls employed at the Site, including the proper maintenance of all remaining monitoring wells, for approval by the Department.

I certify that this RAWP has a plan for transport and disposal of all soil, fill, fluids and other material removed from the property under this Plan, and that all transport and disposal will be performed in accordance with all local, State and Federal laws and requirements. All exported material will be taken to facilities licensed to accept this material in full compliance with all Federal, State and local laws.

I certify that this RAWP has a plan for import of all soils and other material from off-Site and that all activities of this type will be in accordance with all local, State and Federal laws and requirements.

I certify that that this RAWP has a plan for nuisance control during the remediation and all invasive development work, including a dust, odor and vector suppression plan and that such plan is sufficient to control dust, odors and vectors and will prevent nuisances from occurring.

I certify that all information and statements in this certification are true. I understand that a false statement made herein is punishable as Class "A" misdemeanor, pursuant to Section 210.45 of the Penal Law.

080271		
NYS Professional Engineer #	Date	Signature

It is a violation of Article 130 of New York State Education Law for any person to alter this document in any way without the express written verification of adoption by any New York State licensed engineer in accordance with Section 7209(2), Article 130, New York State Education Law.

FINAL REMEDIAL ACTION WORK PLAN

TABLE OF CONTENTS

LIST OF TABLES

LIST OF FIGURES

LIST OF APPENDICES

LIST OF ACRONYMS

Acronym	Definition
AOC	Area of Concern
AST	Aboveground Storage Tank
BCA	Brownfield Cleanup Agreement
BCP	Brownfield Cleanup Program
bgs	below ground surface
CAMP	Community Air Monitoring Plan
C&D	Construction & Demolition Materials
COC	Contaminant of Concern
COPEC	Constituents of Potential Ecological Concern
cy	cubic yard
DER	Division of Environmental Remediation
DER-10	NYSDEC Technical Guidance for Site Investigation & Remediation
DUSR	Data Usability Summary Report
ECs	Engineering Controls
ECL	Environmental Conservation Law
ESA	Environmental Site Assessment
FER	Final Engineering Report
FWRIA	Fish and Wildlife Resources Impact Analysis
gpm	gallons per minute
HHEA	Human Health Exposure Assessment
ICs	Institutional Controls
MW	Monitoring Well
NYSDEC	New York State Department of Environmental Conservation

Acronym	Definition
PCB	Polychlorinated Biphenyls
PID	Photoionization Detector
ppm	parts per million
QAPP	Quality Assurance Project Plan
RA	Remedial Action
RASR	Remedial Action Selection Report
RAWP	Remedial Action Work Plan
RCRA	Resource Conservation and Recovery Act
RDD	Remedial Design Document
RI	Remedial Investigation
RIR	Remedial Investigation Report
RIWP	Remedial Investigation Work Plan
SCG	Standards, Criteria, and Guidance
SCO	Soil Cleanup Objectives
SESI	SESI Consulting Engineers, PC
SMP	Site Management Plan
SSDS	Sub-Slab Depressurization System
SVOCs	Semi-Volatile Organic Compounds
S&W	S&W Redevelopment of North America, LLC.
TAGM	Technical and Administrative Guidance Memorandum
TAL	Target Analyte List
TOGS	Technical and Operations Guidance Series
USEPA	United States Environmental Protection Agency
UST	Underground Storage Tank
VOCs	Volatile Organic Compounds

EXECUTIVE SUMMARY

Site Description/Physical Setting/Site History

Concord Associates, LP entered into a Brownfield Cleanup Agreement (BCA) with the New York State Department of Environmental Conservation (NYSDEC) on May 19, 2005, to investigate and remediate approximately 14.5-acres of the 1,700 acre Concord Hotel Site located in the Town of Thompson, Sullivan County New York. Concord Associates, LP is a Volunteer in the Brownfield Cleanup Program (NYSDEC BCA Index # W3-1004-04-06 and Site # C353008). The 14.5 acres associated with BCA have been divided into five operable units (OU-1A, OU-1B, OU-1C, OU-2 and OU-3) and are part of a larger redevelopment effort. The redevelopment activities include demolition of old structures and construction of new buildings and facilities that are associated with the planned Concord Hotel and Resort project. This Remedial Action Work Plan (RAWP) is solely related to OU-1A, known as the Main Hotel Area (hereinafter "Site"). This RAWP summarizes the nature and extent of contamination as determined from data gathered during the Remedial Investigation (RI), performed between August and September 2008 in OU-1A.

The Site is about 2-acres in area and is in a rural setting. The Site is bounded by Kiamesha Lake Road to the north, an area of former/proposed hotel and resort features (referred to as Brownfield Site Expansion Area (BSEA) pending BCP application approval as BCP Site No. 353012) to the south and west, and Concord Road to the east. The Site is situated on a local topographical high point (a ridge trending approximately northeasterly - southwesterly) and the ground surface slopes towards Kiamesha Lake located about 2,000 feet to the west and towards Kiamesha Creek located about 2,750 feet to the east. The Site has been impacted by historical operations associated with the former Hotel and Resort (primarily from discharges associated with USTs and suspected improper waste handling practices) since the site was abandoned for many years.

The Site is located within the Appalachian Plateau physiographic province. Overburden soil is sand with varying amounts of silt and gravel, underlain by weathered shale/sandstone bedrock. Bedrock is primarily middle to late Devonian shale/sandstone, and is encountered in OU-1A at depths ranging from five (5) to 25 feet below ground surface. Groundwater was encountered within OU-1A at a depth of about 5 feet below ground surface (bgs) within wells installed in former basements and at depths of about 27 bgs elsewhere. The Site appears to be located on a hydraulic divide that coincides with the local topographical high (a ridgeline trending northeasterly-southwesterly). Groundwater flow direction appears to follow the local topography, towards Kiamesha Lake on the northwesterly side of the ridgeline and towards the Kiamesha Creek on the southeasterly side of the ridgeline.

Summary of the Remedial Investigation

The Remedial Investigation (RI) for OU-1A was completed in accordance with the Remedial Investigation Work Plan (RIWP) for the Concord Hotel and Resort, last revised July 24, 2008, and subsequently approved by NYSDEC on August 8, 2008. The RI was completed in the vicinity of three (3) areas of concern (AOC) identified in the RIWP, and supplemental site characterization throughout the OU was conducted per the request of the NYSDEC.

AOC 1 is associated with USTs along Kiamesha Lake Road. Two (2) 15,000 gallon #4 fuel oil USTs, and a 1,500 gallon suspected #2 fuel oil UST (which may have been utilized to store kitchen waste) are present within this AOC. AOC 2 is associated with a 20,000 Gallon UST at the corner of Kiamesha Lake Road and Concord Road. AOC 3 is associated with transformers that are either mounted on a pole or installed on concrete pads.

Between August and September 2008, thirty four (34) soil samples were collected from 16 boring locations, three (3) groundwater samples were collected from as many monitoring wells and one (1) soil vapor sample was collected from a vapor monitoring well within OU-1A. The soil and groundwater samples were analyzed for a combination of Target Compound List (TCL) volatile organic compounds (VOCs), TCL semi-volatile organic compounds, TCL pesticides and PCBs, cyanide and Target Analyte List (TAL) metals. The soil vapor sample was analyzed for VOCs only (USEPA Method TO-15).

A combination of benzo(a)anthracene, benzo(a)pyrene, benzo(b)flouranthene, benzo(k)flouranthene, chrysene and ideno(1,2,3-cd)pyrene were detected in soil samples collected, at the location of three (3) borings, at concentrations that exceeded the applicable Commercial or Protection of Groundwater Soil Cleanup Objectives (SCO). Several analytes (specifically, a combination of 4,4'-DDT copper, lead, nickel, and zinc) were detected at concentrations that exceeded the applicable Unrestricted Soil Cleanup Objectives (USCO), but did not exceed the Commercial and Protection of Groundwater SCOs in the soil samples. Total petroleum hydrocarbon (TPH) concentrations at these soil sample locations ranged between 180 - 5,800 mg/kg.

A combination of bis(2-ethylhexyl)phthalate, Chlordane, p,p'-DDE, p,p'-DDD, p,p'-DDT, manganese and sodium were detected, at concentrations that exceeded the applicable Standards Criteria and Guidance (SCGs) in the groundwater samples collected from the three (3) monitoring wells MW-7, MW-17 and MW-19 associated with OU-1A. Several other metals (Antimony, arsenic, barium, beryllium, chromium, copper, iron, lead, and nickel) were also detected at concentrations that exceeded the applicable SCGs which are likely due to the turbidity of the groundwater samples (these metals were not detected in filtered samples).

Free-phase product was observed at six (6) boring locations within the bedrock fractures and floating on the water in the fractures. The free product plume is about 250 feet long and 200 feet wide extending in a southwesterly direction. The "fingerprint" analysis associated with a sample of the product identified it as "tar substance." Similar product was observed in the vicinity of an UST and associated piping within OU-1A.

Qualitative Human Health Exposure Assessment

The Qualitative Human Health Exposure Assessment concluded that the likelihood of adverse human health effects as a result of exposure to the site's environmental media is remote. Some targeted analytes exceeded, either, the concentrations below which the lifetime risk of cancer is negligible, or, the threshold level below which non-cancer adverse health effects are unlikely. However, the risk associated with these contaminants following redevelopment is negligible because: no one is expected to be exposed to these contaminants over a standard lifetime of 70 years; remediation is expected to eliminate sources and potential exposure pathways; and potable water will be piped in from outside sources (water for on-Site consumption will be purchased from Village of Monticello by a new water district to be created in Township of Thompson) for on-Site consumption instead of utilizing groundwater associated with the Site.

Summary of the Remedy

To address the known soil/groundwater impacts and potential indoor air quality impacts associated with the Site, the following remedies have been proposed in this RAWP:

1. A Track 4 cleanup comprising of removal of source areas during the UST closures. Source area removals will be limited to removal and off-site disposal of grossly contaminated soil (i.e., soil impacted with free/residual-phase product and soil impacts significantly higher than the commercial and protection of groundwater soil cleanup objectives). Any free-phase product within the bedrock will be addressed as discussed below.

2. A composite cover system consisting of soil cover in open areas, asphalt or concrete pavement on walkways, roads and parking lots, concrete building slabs, and "clean soil cover," in landscaped areas will prevent exposure to contaminated soils. The soil cover layer will be one-foot thick and will consist of clean soil that meets 6NYCRR Part 375-6 Commercial and Protection of Groundwater SCOs. The soil cover will overly a demarcation layer indicating the top of residual contaminated soil. The top six inches of the soil cover will be of sufficient quality to support vegetation. Slabs and paving systems (buildings, roadways, parking lots, etc.) will be at least 6 inches thick.

3. An engineering control comprised of a monitoring well network. This engineering control will involve free-phase product recovery and subsequent monitoring of known groundwater impacts and free-phase product via annual groundwater sampling and monitoring well gauging for presence/thickness of free-phase product.

4. Institutional controls to be included in a Site-specific Environmental Easement to ensure the continual and proper management of residual contamination and operation of engineering controls for protection of public health and the environment.

REMEDIAL ACTION WORK PLAN

1.0 INTRODUCTION

Concord Associates, LP entered into a Brownfield Cleanup Agreement (BCA) with the New York State Department of Environmental Conservation (NYSDEC) on May 19, 2005, to investigate and remediate about 14.5-acres of property located in Town of Thompson, Sullivan County New York. Concord Associates, LP is a Volunteer in the Brownfield Cleanup Program. Site usage type, i.e. Commercial use is proposed for the property. When completed, the Site will contain a Hotel and Resort. Refer to the Brownfield Cleanup Program (BCP) application for additional details.

This Remedial Action Work Plan (RAWP), which is limited to OU-1A ("Site" for the purposes of this RAWP) (see Figures 1 and 2 - one of the five operable units OU-1A, OU-1B, OU-1C, OU-2 and OU-3 that comprise the BCP Site), summarizes the nature and extent of contamination as determined from data gathered during the OU-1A Remedial Investigation (RI), performed between August and September 2008. This RAWP provides an evaluation of a Track 1 cleanup and other applicable Remedial Action alternatives for OU-1A, associated costs, and the recommended and preferred remedy. The remedy described in this document is consistent with the procedures defined in DER-10 and complies with all applicable standards, criteria and guidance. The remedy described in this document also complies with all applicable Federal, State and local laws, regulations and requirements. Since this RAWP is being submitted for public comment simultaneous with the RIR for OU-1A, the NYSDEC and New York State Department of Health (NYSDOH) have not yet determined that this Site does not pose a significant threat to human health and the environment. However, significant threat determination is anticipated in the near future, and is expected to be a non-significant threat determination based on the results of the RI. Moreover, the RI for this Site did not identify fish and wildlife resources.

Per DER-10 Section 3.10, a Fish and Wildlife Resources Impact Analysis (FWRIA) has been performed and can be found in Section 2.5.2. A formal Remedial Design document will not be prepared as the remedy for this Site entails principally source removal.

1.1 SITE LOCATION AND DESCRIPTION

The Site is located in the County of Sullivan, Town of Thompson, New York. A United States Geological Survey (USGS) topographical quadrangle (Figure 1) shows the Site location. The Site is situated on an approximately 2-acre area bounded by Kiamesha Lake Road to the north, Brownfield Site Expansion Area (BSEA) (area of former/proposed hotel and resort features) to the south and west, and Concord Road to the east (see Figure 2). A boundary map is attached to the BCA as required by Environmental Conservation Law (ECL) Title 14 Section

27-1419. The Site is fully described in Appendix 1 – Metes and Bounds. A global positioning system coordinate for the starting point is included.

1.2 CONTEMPLATED REDEVELOPMENT PLAN

The Remedial Action to be performed under the RAWP is intended to make the Site protective of human health and the environment consistent with the contemplated end use. The proposed redevelopment plan and end use is described here to provide the basis for this assessment.

As a part of the redevelopment activities in the vicinity of the Site, construction of a Hotel and Resort complex is planned. Approximately one quarter of the 2± acres within OU-1A will be occupied by new buildings, with the remainder loading/roadway areas and landscape areas. The Project redevelopment will include a casino, event center, theatre, ballroom, hotel towers, two multi-level parking garages, new access roads, etc. occupying an additional 31± acres located immediately south-southwest of OU-1A (see Figure 3).

1.3 DESCRIPTION OF SURROUNDING PROPERTY

The surrounding properties consist of single family residential uses and vacant parcels.

- <u>Schools and/or day care facilities</u> – there are no schools or day care centers on or adjacent to the Site.
- <u>Hospitals</u> – the nearest hospital is the Catskill Regional Medical Center located in Harris, NY, approximately five miles northwest of the Site (see Figure 4).
- <u>Residential areas</u> – A few single family residential uses are located in the vicinity of the Site.
- <u>Rivers, streams</u> - There are no rivers or streams on or immediately adjacent to OU-1A. However, Kiamesha Lake is located approximately 1,200 feet to the west of OU-1A and Kiamesha Creek is located about 2,400 feet southeast of OU-1A.
- <u>Wetlands</u> – There are no wetlands on or immediately adjacent to OU-1A. Wetlands associated with Kiamesha Lake exist at a distance of about 600 feet west of OU-1A.
- <u>Human/Ecological Receptors</u> – Human exposures may occur due to contact with soils and during construction activities. Ecological exposures may occur due to contact with contaminated stockpiles during excavation.

2.0 DESCRIPTION OF REMEDIAL INVESTIGATION FINDINGS

The Site was investigated in accordance with the scope of work presented in the NYSDEC-approved Remedial Investigation (RI) Work Plan dated July 24, 2008. The investigation was conducted between August and September 2008. The RI report is being submitted concurrently with this RAWP.

2.1 SITE HISTORY

2.1.1 Past Uses and Ownership

The five OUs that collectively make up the BCP Site and the pending BSEA are part of an expansive Concord Resort Complex that was built in stages over the past 80 years. Previously, the area was either farmland or forest. The Concord Hotel Area (OU-1A and the BSEA) was built in the 1920s on the shore of Kiamesha Lake. It was used as a summer retreat by New York City area residents.

The resort area continued to expand through the 1960s, by which time the site was similar to its current layout. Several of the Main Hotel buildings were demolished over the years. Some of these demolished buildings were evidently buried on site (ECSI, 1998), either at the Main Hotel OU or at other parcels within the resort complex. The hotel was serviced by underground storage tanks (USTs), PCB-containing transformers, utilized pesticides and other chemicals, which after abandoned leaked and leached and have left these areas contaminated. The Complex was abandoned in the early 1990's. Illegal dumping and contamination associated with abandonment of the facility occurred between the early 1990's and the present.

Recently, with the commencement of the planned redevelopment project by the Volunteer, the remaining on-site the buildings have been demolished and related asbestos abatement is complete.

2.1.2 Phase I and Phase II Reports

Phase I and II Environmental Site Assessments were performed for the entire 1,700 acre Concord Resort Complex in September 1998 and July 2004 by Environmental Compliance Services, Inc. (ECSI) and IVI International, Inc. (IVI), respectively. The results of these assessments are included in their entirety as Appendix A to the RIWP dated October 11, 2007, last revised July 24, 2008. Additional information on the presence of known or suspected contamination has been sent to the NYSDEC from Concord Associates, LP, and its environmental contractors involved with the project. Based on the results of these historical investigations, as well as the investigation results outlined in Section 2.1 above, SESI has identified ten Areas of Concern (AOCs) requiring remedial investigation and/or remedial action in the BCP Site. Three of these AOCs, AOC 1 through AOC 3 pertain to the OU-1A Area. These AOCs are outlined in greater detail in Section 2.4.2 below. This RAWP is specifically related to the three AOCs present in OU-1A.

2.2 GEOLOGICAL CONDITIONS

Sullivan County lies within the Appalachian Plateau physiographic province of New York State. Regional bedrock is primarily middle to late Devonian shale, however, SESI encountered primarily sandstone in OU-1A during the July-August site characterization investigation and Geotechnical Engineering investigation conducted May through July 2008. Bedrock is generally shallow throughout the BCP Site, and was encountered at depths ranging from approximately 1.5 to 34 feet bgs in OU-1A.

Overburden consists primarily of sand with silt and gravel intermixed. The Main Hotel area, encompassing OU-1A and the BSEA, lies at the top of a ridge. Groundwater was not encountered in the overburden in OU-1A or the BSEA, but was encountered in bedrock. Bedrock elevation data indicates that west of the ridge, groundwater flows through bedrock (and potentially down-gradient soil overburden) towards Kiamesha Lake to the west.

A geologic section is shown in Figure 5. The groundwater flow map is included as Figure 6.

2.3 CONTAMINATION CONDITIONS

2.3.1 Conceptual Model of Site Contamination

- The OU-1A Area contains a thin layer of fill material, impacted above applicable SCGs with metals. The depth and composition of the fill varies across the OU. Low levels of metals contamination was identified at depths ranging from the ground surface to approximately 28 feet bgs. VOC/SVOC contamination, presumably associated with leaking USTs, was identified at depths ranging from 13.5 to 17 feet bgs. Bedrock was encountered from approximately 1.5 to 34 feet bgs. Groundwater was not encountered above the underlying bedrock.

2.3.2 Description of Three OU-1A Areas of Concern

AOC 1 – USTs along Kiamesha Lake Road – The Main Hotel utilized two 15,000-gallon #4 fuel oil USTs, and a 1,500-gallon UST that reportedly contained #2 fuel oil and/or kitchen waste. The two 15,000-gallon USTs are located near the intersection of Kiamesha Lake Road and Concord Road, and the smaller UST was located near a kitchen entrance fronting Kiamesha Lake Road.

On February 28, 1998 the tank's integrities were tested by Precision Tank Testing, LLC. The two 15,000-gallon tanks were tested and passed the integrity tests. Therefore, no additional investigation was completed. The 1,500-gallon tank, however, failed integrity testing and soil borings were installed around the tank. Soil samples collected from the borings were screened with a PID, but PID readings did not provide evidence indicating a release occurred. The 1,500-gallon UST was evacuated and sealed to await later decommissioning. Additionally, JM Associates, Inc., on 11/30/06, evacuated the two 15,000-gallon tanks.

<u>AOC 2 – 20,000 Gallon UST at the Corner of Kiamesha Lake Road and Concord Road</u> – Reportedly, this UST may be located, either in part or entirely, beneath the existing roadways. Due to its suspected location, this UST has not been tested or pumped out.

<u>AOC 3 – Pole- and Concrete Pad-Mounted Transformers</u> – Several telephone pole-mounted electrical transformers and concrete pad-mounted electrical transformers in OU-1A represent an AOC; however, this AOC was addressed pursuant to a separate Interim Remedial Measures Work Plan (IRMWP) dated June 18, 2008 and approved by the NYSDEC on July 23, 2008. On August 20 and September 5, 2008, these transformers, together with others located in the vicinity of OU-1A, were disposed of off-Site by JM Associates, Bedford Hills, New York. The transformers, depending on their PCB concentrations, were disposed of at TCI of NY, LLC, Hudson, New York and TCI of Alabama, Pell City, Alabama. Complete details of these remedial activities completed in accordance with the NYSDEC approved Interim Remedial Measures Work Plan for the transformers will be submitted as a part of the Final Engineering Report.

2.3.3 Identification of Standards, Criteria and Guidance

The following standards and criteria typically will apply to Site Characterizations, Remedial Investigations, remedy selection, UST closures, remedial actions and site management activities:

- 6 NYCRR Part 257 - Air Quality Standards
- 29 CFR Part 1910.120 - Hazardous Waste Operations and Emergency Response
- TAGM 4046 - Determination of Soil Cleanup Objectives and Cleanup Levels (January 1994)
- TOGS 1.1.1 - Ambient Water Quality Standards & Guidance Values and Groundwater Effluent Limitations
- Fish and Wildlife Impact Analysis for Inactive Hazardous Waste Sites (October 1994)

- Technical Guidance for Screening Contaminated Sediments (January 1999)
- NYSDOH Guidance for Evaluating Soil Vapor Intrusion in the State of New York (draft October 2004 or subsequent final draft)
- DER Interim Strategy for Groundwater Remediation at Contaminated Sites in New York State
- 6 NYCRR Part 375 - Regulations Subparts 1, 3 and 6 applicable to the Brownfield Cleanup Program
- TAGM 4051 - Early Design Strategy (August 1993)
- Citizen Participation in New York's Hazardous Waste Site Remediation Program: A Guidebook (June 1998)
- TAGM 3028 - "Contained In" Criteria for Environmental Media: Soil Action Levels (August 1997)
- Air Guide 1 - Guidelines for the Control of Toxic Ambient Air Contaminants
- USEPA Office of Solid Waste and Emergency Response Directive 9355.047FS Presumptive Remedies: Policy and Procedures (September 1993)
- USEPA Office of Solid Waste and Emergency Response Directive 9355.048FS Presumptive Remedies:
- Site Characterization and Technology Selection for CERCLA sites with Volatile Organic Compounds in Soils (September 1993)
- 6 NYCRR Part 612 - Registration of Petroleum Storage Facilities (February 1992)
- 6 NYCRR Part 613 - Handling and Storage of Petroleum (February 1992)
- 6 NYCRR Part 614 - Standards for New and Substantially Modified Petroleum Storage Tanks (February 1992)
- 6 NYCRR Part 371 - Identification and Listing of Hazardous Wastes (November 1998)
- 6 NYCRR Subpart 374-2 - Standards for the Management of Used Oil (November 1998)
- 6 NYCRR Parts 700-706 - Water Quality Standards (June 1998)
- 40 CFR Part 280 - Technical Standards and Corrective Action Requirements for Owners and Operators of Underground Storage Tanks

- STARS #1 - Petroleum-Contaminated Soil Guidance Policy
- STARS #2 - Biocell and Biopile Designs for Small-Scale Petroleum-Contaminated Soil Projects
- SPOTS #14 - Site Assessments at Bulk Storage Facilities (August 1994)
- Spill Response Guidance Manual
- Permanent Closure of Petroleum Storage Tanks (July 1988)
- NYSDOH Environmental Health Manual CSFP-530 - "Individual Water Supplies - Activated Carbon Treatment Systems"
- 40 CFR Part 144 - Underground Injection Control Program
- 10 NYCRR Part 67 – Lead
- 12 NYCRR Part 56 - Industrial Code Rule 56 (Asbestos)
- 6 NYCRR Part 175 - Special Licenses and Permits--Definitions and Uniform Procedures
- 6 NYCRR Part 371 - Identification and Listing of Hazardous Wastes (November 1998)
- 6 NYCRR Part 372 - Hazardous Waste Manifest System and Related Standards for Generators, Transporters and Facilities (November 1998)
- 6 NYCRR Subpart 374-1 - Standards for the Management of Specific Hazardous Wastes and Specific Types of Hazardous Waste Management Facilities (November 1998)
- 6 NYCRR Subpart 374-3 - Standards for Universal Waste (November 1998)
- 19 NYCRR Part 600 - Waterfront Revitalization and Coastal Resources
- 6 NYCRR Part 608 - Use and Protection of Waters
- 6 NYCRR Part 661 - Tidal Wetlands - Land Use Regulations
- 6 NYCRR Part 663 - Freshwater Wetlands - Permit Requirements
- 6 NYCRR Part 750 through 758 - Implementation of NPDES Program in NYS ("SPDES Regulations")
- TAGM 4013 - Emergency Hazardous Waste Drum Removal/ Surficial Cleanup Procedures (March 1996)
- TAGM 4059 - Making Changes To Selected Remedies (May 1998)

- Groundwater Effluent Limitations
- TOGS 1.3.8 - New Discharges to Publicly Owned Treatment Works
- TOGS 2.1.2 - Underground Injection/Recirculation (UIR) at Groundwater Remediation Sites
- State Coastal Management Policies
- OSWER Directive 9200.4-17 - Use of Monitored Natural Attenuation at Superfund, RCRA Corrective Action, and Underground Storage Tank Sites (November 1997)
- Groundwater Monitoring Well Decommissioning Procedures (May 1995)
- The activity is a component of a program selected by a process complying with the public participation requirements of section 1.10, to the extent applicable.

2.4 SUMMARY OF REMEDIAL INVESTIGATIONS PERFORMED

2.4.1 Borings and Wells

Thirty four (34) soil samples were collected from 16 boring locations. Four (4) monitoring wells were installed within OU-1A and several temporary wells (to delineate off-Site extent of free-phase product observed within OU-1A) were installed outside OU-1A. The locations of the soil borings, monitoring wells and temporary wells are depicted on Figures 8 and 9. The boring logs and monitoring well construction logs are included as Appendix 2 and Appendix 3, respectively. Soil samples collected were selected based on field screening results, including visual observations, olfactory indicators, and screening with a photoionization detector (PID).

The soil and groundwater samples were primarily analyzed for a combination of Target Compound List (TCL) Volatile Organic Compounds (VOCs), TCL Semi-Volatile Organic Compounds, TCL pesticides and PCBs, Target Analyte List (TAL) metals and cyanide. A summary of the samples collected and associated depths, etc are summarized on Table 1.

2.4.2 Samples Collected and Analytical Work Performed

<u>AOC 1 – USTs Along Kiamesha Lake Road</u>

Eleven (11) soil samples were collected from boring locations OU1A- 9, OU1A-10, OU1A-12, OU1A-13, OU1A-14, and OU1A-15. The samples were analyzed for a combination of VOCs, SVOCs and TPH.

AOC 2 – 20,000 Gallon UST

Samples were collected from boring locations OU1A-11 and OU1A-18 from the vicinity of the UST and analyzed for VOCs, SVOCs and TPH.

AOC 3 – Pole and Concrete-Pad Mounted Transformers

Two soil samples, one surficial and one relatively deep, were collected from the vicinity of transformers T-10 and T-13. The samples were analyzed for PCBs.

Groundwater Samples from Monitoring Wells

Groundwater samples from monitoring wells MW-4, MW-7 and MW-19 were analyzed for VOCs, SVOCs, pesticides, PCBs and metals. Groundwater samples from MW-17 were only analysed for VOCs due to low water yield from the well (additional samples will be collected during the course of the ongoing field activities).

Below is a summary of RI findings.

2.4.3 Soil/Fill Contamination

Analytical results of samples collected during the course of the site characterization and remedial investigation work are summarized in table 2.

AOC 1 – USTs Along Kiamesha Lake Road

Eleven (11) soil samples were collected from boring locations OU1A- 9, OU1A-10, OU1A-12, OU1A-13, OU1A-14, and OU1A-15. The samples were analyzed for a combination of VOCs, SVOCs and TPH.

A combination of benzo(a)anthracene (2.3 - 15.0 mg/kg), benzo(a)pyrene (1.3 – 11.0 mg/kg), benzo(b)flouranthene (1.4 – 16.0 mg/kg), benzo(k)flouranthene (4.9 mg/kg) chrysene (1.2 – 14.0 mg/kg) and indeno(1,2,3-cd)pyrene (1.0 – 7.0 mg/kg) were detected in samples collected from borings OU1A-9, OU1A-10, OU1A-13 and OU1A-15 at concentrations that exceeded the applicable SCGs. The remaining compounds were either not detected at concentrations that exceeded the reporting limits or did not exceed the applicable SCGs. TPH impacts were detected (180 - 5,800 mg/kg).

AOC 2 – 20,000 Gallon UST

Samples were collected from boring locations OU1A-11 and OU1A-18 from the vicinity of the UST and analyzed for VOCs, SVOCs and TPH. All the targeted analytes were detected at concentrations that either did not exceed the reporting limits or were detected at concentration below the applicable SCGs. TPH concentrations in the soil sample collected from boring OU1A-11 was 1,700 mg/kg.

AOC 3 – Pole and Concrete-Pad Mounted Transformers

Two soil samples, one surficial and one relatively deep, were collected from the vicinity of transformers T-10 and T-13. The samples were analyzed for PCBs. Results indicated that, in the surficial soil samples, PCBs were present at concentrations (of about 0.08 mg/kg) that exceeded the reporting limits but did not exceed the applicable SCGs.

Samples Collected Outside Known AOCs

Eighteen samples were collected from nine boring locations OU1A-1, OU1A-2, OU1A-3, OU1A-5, OU1A-6, OU1A-8, OU1A-9, OU1A-10, and OU1A-11. The samples were analyzed for TCL VOCs, TCL SVOCs, TCL PCBs, TCL pesticides and TAL metals. All the targeted analytes either did not exceed their reporting limits or were detected at concentrations that did not exceed the applicable SCGs.

Table 2 shows exceedances from Track 1 Unrestricted SCOs for all soil/fill at the Site. Figure 8 is a spider map that shows the location and summarizes exceedances from Track 1 Unrestricted SCOs for all soil/fill.

2.4.4 On-Site and Off-Site Groundwater Contamination

Groundwater samples were collected from the monitoring wells MW-4, MW-7, MW-17 and MW-19 installed within OU-1A. All the groundwater samples, with the exception of groundwater sample collected from MW-17, were analyzed for TCL VOCs, TCL SVOCs, TCL PCBs, TCL pesticides and TAL Metals. Sample collected from monitoring well MW-17 was analyzed only for VOCs as this well recharged slowly and did not yield enough sample volume. A summary of the geochemical parameters recorded during the groundwater sampling event are summarized in Table 3.

The groundwater analytical results, summarized in Table 4, indicate that the following analytes exceeded the applicable SCGs (specifically TOGS 1.1.1):

- bis(2-Ethylhexyl)phthalate (18.0 µg/L) in the sample collected from monitoring well MW-7;
- Chlordane (0.53 µg/L) and P,P'-DDT (0.71 µg/L) in the sample collected from monitoring well MW-4;
- Manganese (970 - 4,000 µg/L) and sodium (76,000 - 240,000 µg/L) in the samples (filtered) collected from monitoring wells MW-4, MW-7 and MW-19. Several other metals (antimony, arsenic, barium, beryllium, chromium, copper, iron, lead, and nickel) were detected at concentrations that exceeded the applicable SCGs in the unfiltered samples.

Free-phase product observed within MW-7 and its vicinity was "fingerprinted." The "fingerprint" results identified the free-phase product as "tar substance" (based on field observations it is likely weathered #4 fuel oil associated with the UST). Several temporary wells were installed outside OU-1A and delineation of the extent of this free-phase product was completed (see Figure 9).

A table that indicates exceedances from GA groundwater standards in monitor wells prior to the remedy is shown in Table 4. A spider map that indicates the location(s) of and summarizes exceedances from GA groundwater standards prior to the remedy is shown in Figure 9.

2.4.5 On-Site and Off-Site Soil Vapor Contamination (to be submitted as an addendum)

A table of soil vapor data collected prior to the remedy is shown in Table 5. A spider map that indicates the location(s) of and summarizes soil vapor data prior to the remedy is shown in Figure 10.

2.5 ENVIRONMENTAL AND PUBLIC HEALTH ASSESSMENTS

2.5.1 Qualitative Human Health Exposure Assessment

A Qualitative Human Health Exposure Assessment completed by Atlantic Environmental, Inc. of Dover, New Jersey is included as Appendix 4. The Qualitative Human Health Exposure Assessment concluded that the likelihood of adverse human health effects as a result of exposure to the site's environmental media is remote. Some targeted analytes exceeded, either, the concentrations below which the lifetime risk of cancer is negligible, or, the threshold level below which non-cancer adverse health effects are unlikely. However, the risk associated with these contaminants following redevelopment is negligible because: no one is expected to be exposed to these contaminants over a standard lifetime of 70 years; remediation is expected to eliminate sources and potential exposure pathways; and potable water will be piped in from remote sources for on-Site consumption instead of utilizing groundwater associated with the Site.

2.5.2 Fish & Wildlife Remedial Impact Analysis

A copy of the Fish and Wildlife Impact Analysis (FWIA), completed in accordance with DER-10 is included as Appendix 5. The analysis concluded that existing fish and wildlife habitat is absent within OU-1A and minimal in the immediate surrounding areas within a half-mile radius. It also concludes that the presence of surrounding impervious/disturbed areas prohibits/minimizes the likelihood of adverse effects and ecological risks to fish and wildlife resources from the migration of constituents of potential ecological concern. Additionally, remedial activities and on-Site improvements associated with storm water controls, would remove the potential pathways for contamination migration to down-gradient ecological receptors.

2.6 SIGNIFICANT THREAT

The NYSDEC and NYSDOH are currently evaluating the RIR to discern if this Site does/does not pose a significant threat to human health and the environment. Notice of that determination will be provided for public review.

2.7 REMEDIAL ACTION OBJECTIVES

Based on the results of the Remedial Investigation, the following Remedial Action Objectives (RAOs) have been identified for this Site.

2.7.1 Groundwater

RAOs for Public Health Protection

- Prevent ingestion of groundwater containing contaminant levels exceeding drinking water standards.
- Prevent contact with, or inhalation of, volatiles emanating from contaminated groundwater.

RAOs for Environmental Protection

- Restore ground water aquifer, to the extent practicable, to pre-disposal/pre-release conditions.
- Prevent the discharge of contaminants to surface water.
- Remove the source of ground or surface water contamination.

2.7.2 Soil

RAOs for Public Health Protection

- Prevent ingestion/direct contact with contaminated soil.
- Prevent inhalation of, or exposure to, contaminants volatilizing from contaminated soil.

RAOs for Environmental Protection

- Prevent migration of contaminants that would result in groundwater or surface water contamination.
- Prevent impacts to biota due to ingestion/direct contact with contaminated soil that would cause toxicity or bioaccumulation through the terrestrial food chain.

3.0 DESCRIPTION OF REMEDIAL ACTION PLAN

3.1 EVALUATION OF REMEDIAL ALTERNATIVES

Track 1

The Track 1 cleanup alternative would allow the site to be redeveloped for unrestricted future use. This alternative would involve the complete removal and/or remediation of all contaminated soils above bedrock (or water table which ever is encountered first). Long-term institutional and engineering controls would be implemented to address contamination in groundwater or soil vapor, if applicable. A feasible remedial technology that may be used to implement this alternative involves the excavation of the contaminated soil and transportation to an off-site facility for disposal.

Tracks 2 and 3

Track 2 and 3 cleanup alternatives involve remediation of the site to commercial criteria rather than the unrestricted Track 1 alternative. The Track 2 alternative would meet the commercial Soil Cleanup Objectives as opposed to the Track 1 unrestricted SCOs, or alternatively, the Department may approve a site-specific modification to the Track 2 objectives for a Track 3 cleanup. Both tracks would involve remediation of impacted soil to bedrock or a depth of 15 feet below proposed finished grades, whichever is encountered first, until the applicable SCOs are achieved. Long-term institutional and engineering controls would be implemented to address contamination in groundwater or soil vapor, if applicable. A feasible remedial technology that may be used to implement these alternatives is also excavation and off-Site disposal as discussed above.

Track 4

The Track 4 cleanup alternative would involve hot spot/source removal and construction of a capping system over the remaining contaminated soils. The cap would consist of concrete slabs, asphalt pavement, or soil meeting the commercial soil cleanup criteria. Below the capping system, contaminated soil could remain; however, locations that are source areas (grossly impacted soil and soil impacts significantly exceeding the commercial or protection of groundwater SCOs), will be addressed either by removal, containment, or treatment. Long-term institutional controls would be implemented to address residual impacted soils and groundwater impacts, as applicable.

Site capping typically involves constructing a separation layer (e.g. a one-foot soil capping layer with an underlying demarcation geotextile) to prevent direct contact with the contaminants, and restrict storm water from entering the subsurface. This alternative may be combined with another treatment method to reduce the volume/concentration of contamination remaining on site under the cap (e.g., free-phase product removal associated with OU-1A). Methods to address migration of volatilized contaminants through the cap may be integrated into the design (e.g. sub-slab vapor extraction system).

Track 4 cleanup would also include an engineering control comprised of a monitoring well network. This engineering control will involve free-phase product recovery and subsequent monitoring of known groundwater impacts and free-phase product via annual groundwater sampling and monitoring well gauging for presence/thickness of free-phase product

A discussion of these approaches and whether or not they satisfy the remedial action selection criteria is included below.

Protection of human health and the environment:

Although all tracks will provide adequate protection of human health and the environment, Track 1 would be the most favorable because it involves the complete removal of all soil contamination and the removal of the bulk of groundwater contamination, ultimately leaving the least amount of contamination on-site. However, it would be cost prohibitive to implement a Track 1 clean-up due to the depth of excavation required, and the redevelopment and RA might not occur.

Compliance with standards, criteria, and guidelines (SCGs):

Similar to the reasons discussed above, Track 1 would achieve cleanup to the most stringent applicable SCGs outlined in Section 2.4.3.

Short-term effectiveness and impacts:

Tracks 1 through 3 are the least favorable in terms of short-term effectiveness primarily because they involve removal and/or treatment of the soil to depths extending beneath the proposed construction grades. This is less favorable than the Track 4 approach because it would expose construction workers to a greater volume of contaminated soil, prolong the remediation schedule, and result in a greater potential for migration of impacts from the open excavation (e.g. wind erosion, storm water intrusion, etc.).

Long-term effectiveness and permanence:

Because Track 1 would involve removal of the greatest amount of contaminated soil, it would provide the most long-term effectiveness; however, it is cost prohibitive due to the depth of the excavation. The site capping system associated with the Track 4 cleanup is a cost effective long-term remedial strategy, even though it involves the highest level of long term maintenance among the four tracks.

Reduction of toxicity, mobility, or volume of contaminated material:

Tracks 1 through 4 all involve an ultimate reduction of toxicity and volume of contaminated material. While Track 4 provides a relatively smaller reduction in volume than the other tracks, it relies primarily on source removal and the decrease in contaminant mobility to serve as an effective remedial alternative.

Implementability:

Based on the site redevelopment plan, Track 4 is the most feasible remedial alternative. To achieve the proposed grades, the site requires a net excavation of approximately 22,000 tons of soil. Additionally, the proposed paving, concrete, and foundations will serve as a site cap. Track 1 is the most difficult to implement because of the deeper excavation depths and associated excavation support systems that would be required along the entire perimeter of the site.

Cost effectiveness:

The preferred alternative should provide optimal suitability of the eight accompanying evaluation factors with minimal remedial cost. Because of the extent of contamination at the site, Tracks 1 through 3 will involve the excavation of a larger volume of contaminated soil, and would result in a longer remedial construction schedule. Track 4 minimizes the remedial schedule, while satisfying the other eight evaluation criteria; therefore, it is the most cost effective remedial alternative.

Community Acceptance:

A community outreach program will be incorporated into all remedial alternatives, per NYSDEC Brownfield Program law and regulations. Track 4 cleanup would result in the widest level of acceptance throughout the community because it would allow for the RA and the redevelopment of the Site to proceed in the most expedited time frame with minimal truck traffic of contaminated soil through the community. The other tracks, particularly Track 1, would be cost prohibitive, and therefore, the redevelopment might not occur and would generate significant truck traffic to move contaminated soils off-site.

Land use:

All cleanup tracks would achieve remediation with little to no impact to the current or proposed redevelopment land use of the area since OU-1A is near the center of the 1,700 acre Concord Site Complex and not in proximity to any other adjacent redevelopment site.

Remedial Action standards, criteria and guidance should be listed and in most cases, should include at a minimum the following.

- 6 NYCRR Part 375-6.8 Soil Cleanup Objectives
- New York State Groundwater Quality Standards – 6 NYCRR Part 703;
- NYSDEC Ambient Water Quality Standards and Guidance Values – TOGS 1.1.1;
- NYSDEC Draft DER-10 Technical Guidance for Site Investigation and Remediation - December 2002 (or later version if available);
- NYSDEC Draft Brownfield Cleanup Program Guide – May 2004;
- New York State Department of Health (NYSDOH) Generic Community Air Monitoring Plan
- NYS Waste Transporter Permits – 6 NYCRR Part 364;
- NYS Solid Waste Management Requirements – 6 NYCRR Part 360 and Part 364;

3.2 SELECTION OF THE PREFERRED REMEDY

Zoning: Implementation of a Track 4 cleanup will facilitate the proposed commercial development, which is consistent with applicable zoning laws and anticipated future use of the site.

Applicable comprehensive community master plans or land use plans: Implementation of a Track 4 cleanup will facilitate the proposed commercial development, which is consistent with current land use plan, which underwent an extensive SEQRA EIS process and was approved by the impacted municipalities.

Surrounding property uses: The Track 4 cleanup approach is not expected to impact land use of the surrounding properties as it involved minimal truck traffic compared to the other potential remedies.

Citizen Participation: Citizen Participation during implementation of a Track 4 remedial program will proceed in accordance with the Citizen Participation Plan included as Appendix 6 of this RAWP and as noted above will have minimal community impact.

Environmental justice concerns: There are no known environmental justice concerns associated with this project. Monticello is in an economically distressed area, but this project will help this area by creating numerous jobs.

Land use designations: A Track 4 remedy will not restrict any current or future land use designations.

Population growth patterns: A Track 4 remedy will not impact reasonably anticipated population growth patterns in the area.

Accessibility to existing infrastructure: Existing infrastructure at the site will be demolished and new infrastructure installed as part of remediation/redevelopment.

Proximity to natural resources: The site is in close proximity to Kiamesha Lake and Kiamesha Creek. Measures to protect this natural resource during remediation/redevelopment will be addressed in the Storm Water Pollution Prevention Plan (SWPP), included as Appendix 10. A well search completed in accordance with DER-10 identified only two (2) well completion records within a mile from the Site. The nearest well is located about 3,000 feet to the west (on the northern side of Kiamesha Lake). Given the relatively low groundwater impacts and large distances, it is unlikely that groundwater impacts associated with the Site are influenced by the pumping at these off-Site well locations.

Off-Site groundwater impacts: No off-Site potential groundwater impacts were identified during the RI activities activities with the exception of the LNAPL plume which is migrating off-site into the BSEA. Measures to prevent any off-site groundwater impacts are proposed in this work plan.

Geography and geology of the Site: See Sections 2.2 and 2.3 above.

Current Institutional Controls: There are no current institutional controls associated with the site. An institutional control will be required to address the long-term management of soil and potentially impacted groundwater remaining at the site following remediation.

3.3 SUMMARY OF SELECTED REMEDIAL ACTIONS

A summary of the remedial actions, to address the impacts identified within OU-1A, are discussed below:

1. Source removal excavation will be limited to soil that is grossly contaminated (i.e., soil that may act as a source of groundwater impacts or soil vapor with a potential to impact indoor air quality in structures up to 100 feet away) or is impacted at levels that significantly exceed the Site-specific SCOs listed in Table 6 (i.e., concentrations significantly exceeding commercial or protection of groundwater soil cleanup objectives) as well as soil / fill needed to be removed to complete the proposed construction project;

2. Construction and maintenance of an engineered composite cover consisting of a building, roadways and "clean cover" in landscaped areas to prevent human exposure to residual contaminated soil/fill remaining under the Site;
3. Periodic removal of the free-phase product, gauging of free-phase product thickness and collection of groundwater samples (annually) from monitoring wells installed in the vicinity of the free-phase product ("tar substance") impacts encountered within OU-1A.
4. Recording of an Environmental Easement, including Institutional Controls, to prevent future exposure to any residual contamination remaining at the Site;
5. Publication of a Site Management Plan for long term management of residual contamination as required by the Environmental Easement, including plans for: (1) Institutional and Engineering Controls, (2) monitoring, (3) operation and maintenance and (4) reporting;
6. Screening for indications of contamination (by visual means, odor, and monitoring with PID) of all excavated soil during any intrusive Site work;
7. Collection and analysis of end-point samples to evaluate the performance of the remedy with respect to attainment of the commercial Site-specific SCOs;
8. Appropriate off-Site disposal of all material removed from the Site in accordance with all Federal, State and local rules and regulations for handling, transport, and disposal;
9. Import of materials and soil excavated during redevelopment construction activities within OU-1A, to be used for backfill and cover will be in compliance with: (1) chemical limits and other specifications included in Table 6, (2) all Federal, State, local rules and regulations and site-specific approvals [i.e. the Beneficial Use Determination (BUD) pending approval by NYSDEC] for handling/reuse and transport of material;
10. All responsibilities associated with the Remedial Action, including permitting requirements and pretreatment requirements, will be addressed in accordance with all applicable Federal, State and local rules and regulations.

Remedial activities will be performed at the Site in accordance with this NYSDEC-approved RAWP. All deviations from the RAWP will be promptly reported to NYSDEC for approval and fully explained in the FER.

4.0 REMEDIAL ACTION PROGRAM

4.1 GOVERNING DOCUMENTS

4.1.1 Site Specific Health & Safety Plan (HASP)

A copy of the SESI HASP is included as Appendix 7. All remedial work performed under this plan will be in full compliance with governmental requirements, including Site and worker safety requirements mandated by Federal OSHA.

The Volunteer and associated parties preparing the remedial documents submitted to the State and those performing the construction work, are completely responsible for the preparation of an appropriate Health and Safety Plan and for the appropriate performance of work according to that plan and applicable laws.

The Health and Safety Plan (HASP) and requirements defined in this Remedial Action Work Plan pertain to all remedial and invasive work performed at the Site until the issuance of a Certificate of Completion.

The Site Safety Coordinator will be Mark B. Anderson, C.L.A., P.P. A resume will be provided to NYSDEC prior to the start of remedial construction.

Confined space entry will comply with all OSHA requirements to address the potential risk posed by combustible and toxic gasses.

4.1.2 Quality Assurance Project Plan (QAPP)

A copy of the SESI QAPP is included as Appendix 8. All field sampling procedures and analytical methods will be implemented in accordance with this QAPP.

4.1.3 Construction Quality Assurance Plan (CQAP)

The Construction Quality Assurance Plan (CQAP) is included in Appendix 9. This plan describes how the successful performance of the Remedial Action tasks will be assured through designed and documented QA/QC methodologies applied in the field and in the lab. The CQAP provides a detailed description of the observation and testing activities that will be used to monitor construction quality and confirm that remedy construction is in conformance with the remediation objectives and specifications. The CQAP includes:

- Responsibilities and authorities of the organizations and key personnel involved in the design and construction of the remedy.

- Qualifications of the quality assurance personnel that demonstrate that they possess the proper training and experience necessary to fulfill project-specific responsibilities.
- The observations and tests that will be used to monitor construction and the frequency of performance of such activities.
- The sampling activities, sample size, sample locations, frequency of testing, acceptance and rejection criteria, and plans for implementing corrective measures as addressed in the plans and specifications.
- Requirements for project coordination meetings between the Applicant and its representatives, the Construction Manager, Excavation Contractor, remedial or environmental subcontractors, and other involved parties.
- Description of the reporting requirements for quality assurance activities including such items as daily summary reports, schedule of data submissions, inspection data sheets, problem identification and corrective measures reports, evaluation reports, acceptance reports, and final documentation.
- Description of the final documentation retention provisions.

4.1.4 Soil/Materials Management Plan (SoMP)

The SoMP is included as section 5.4 and includes detailed plans for managing all soils/materials that are disturbed at the Site, including excavation, handling, storage, transport and disposal. It also includes all of the controls that will be applied to these efforts to assure effective, nuisance-free performance in compliance with all applicable Federal, State and local laws and regulations, and the approved BUD.

4.1.5 Storm-Water Pollution Prevention Plan (SWPPP)

The SWPPP(General Permit No. GP-0-08-001) is included in Appendix 10. The SWPPP addresses requirements of New York State Storm-Water Management Regulations including physical methods to control and/or divert surface water flows and to limit the potential for erosion and migration of Site soils, via wind or water.

The erosion and sediment controls included in the SWPPP are in conformance with requirements presented in the New York State Guidelines for Urban Erosion and Sediment Control and were thoroughly analyzed during the SEQRA EIS process.

4.1.6 Community Air Monitoring Plan (CAMP)

A copy of the CAMP for the site is included as Appendix 7.

4.1.7 Contractors Site Operations Plan (SOP);

A copy of the SOP is included as Appendix 11 (to be provided by the contractor for the Site). The Remediation Contractor will prepare a Contractors SOP prior to the start of construction. The Environmental/Remediation Engineer, SESI, will review this SOP for completeness and ensure it includes the following items, at a minimum:

- Anticipated hours of work;
- Site security procedures;
- Traffic control measures; and
- Planned contingency actions.

The Remediation Engineer will review all plans and submittals for this remedial project (including those listed above and contractor and sub-contractor document submittals) and confirm that they are in compliance with this RAWP. All remedial documents will be submitted to NYSDEC and NYSDOH in a timely manner and prior to the start of work.

4.1.8 Community Participation Plan

A certification of mailing will be sent by the Volunteer to the NYSDEC project manager following the distribution of all Fact Sheets and notices that includes: (1) certification that the Fact Sheets were mailed, (2) the date they were mailed; (3) a copy of the Fact Sheet, (4) a list of recipients (contact list); and (5) a statement that the repository was inspected on _ and that it contained all of applicable project documents.

No changes will be made to approved Fact Sheets authorized for release by NYSDEC without written consent of the NYSDEC. No other information, such as brochures and flyers, will be included with the Fact Sheet mailing.

The updated Community Participation Plan for this project is attached in Appendix 6.

Document repositories have been established at the following locations and contain all applicable project documents:

Crawford Public Library	Hours
Reference Desk	Mon., Tues., Thurs., Fri. 10:00 am – 6:00 pm
187 Broadway #189	Wednesday - 10:00 am – 7:30 pm
Monticello, NY 12701	Saturday - 11:00 am – 3:00 pm
	Sunday - Closed

NYSDEC Region 3
New Paltz Office
21 South Putt Corners Rd.
New Paltz, New York 12561
(845) 256-3154

4.2 GENERAL REMEDIAL CONSTRUCTION INFORMATION

4.2.1 Project Organization

Concord Associates, LP is the BCP Volunteer and redeveloper of the Site. SESI is the environmental consultant for Concord Associates. A table summarizing the various personnel associated with the project is included as Table 7.

Resumes of key personnel involved in the Remedial Action are included in Appendix 12.

4.2.2 Remedial Engineer

The Remedial Engineer for this project will be Michael St. Pierre. The Remedial Engineer is a registered professional engineer licensed by the State of New York. The Remedial Engineer will have primary direct responsibility for implementation of the remedial program for the Concord Hotel and Resort Site (NYSDEC BCA Index No. W3-1004-04-06 Site No. C353008). The Remedial Engineer will certify in the Final Engineering Report that the remedial activities were observed by qualified environmental professionals under his supervision and that the remediation requirements set forth in the Remedial Action Work Plan and any other relevant provisions of ECL 27-1419 have been achieved in full conformance with that Plan. Other Remedial Engineer certification requirements are listed later in this RAWP.

The Remedial Engineer will coordinate the work of other contractors and subcontractors involved in all aspects of remedial construction, including soil excavation, stockpiling, characterization, removal and disposal, air monitoring, emergency spill response services, import of back fill material, and management of waste transport and disposal. The Remedial Engineer will be responsible for all appropriate communication with NYSDEC and NYSDOH.

The Remedial Engineer will review all pre-remedial plans submitted by contractors for compliance with this Remedial Action Work Plan and will certify compliance in the Final Remediation Report.

The Remedial Engineer will provide the certifications listed in the Final Engineering Report.

4.2.3 Remedial Action Construction Schedule

A remedial action construction schedule is included as Table 8. The schedule includes estimates of time required to complete the activities associated with the remedial action. It is based on elapsed time from receipt of NYSDEC approval. Once NYSDEC approves this RAWP, an updated schedule showing actual dates will be provided to the NYSDEC as an addendum to this plan.

4.2.4 Work Hours

The hours for operation of remedial construction will conform to the Town of Thompson Department of Buildings construction code requirements or according to specific variances issued by that agency. DEC will be notified by the Applicant of any variances issued by the Department of Buildings.

4.2.5 Site Security

A description of the proposed site security measures will be included in the Site Operations Plan (see Section 4.1.7). The Site is secured with fences and locked gates. Access to Site is controlled by a security guard and local police patrolling the area.

4.2.6 Traffic Control

A description of the proposed traffic control measures will be included in the Site Operations Plan (see Section 4.1.7). Currently, all traffic is directed down the main access road to the Site - Concord Road - and this will likely continue.

4.2.7 Contingency Plan

A description of the proposed contingency measures will be included in the Site Operations Plan (see Section 4.1.7).

4.2.8 Worker Training and Monitoring

Worker training and monitoring requirements will be outlined in the CQAP (see Section 4.1.3).

4.2.9 Agency Approvals

The Applicant has addressed all SEQRA requirements for this Site. All permits or government approvals required for remedial construction have been, or will be, obtained prior to the start of remedial construction. The IRM workplan associated with OU-1A was approved by NYSDEC in a letter, dated September 30, 2008.

The planned end use for the Site is in conformance with the current zoning for the property as determined by the Town of Thompson Department of Planning

4.2.10 NYSDEC BCP Signage

A project sign has been erected at the main entrance to the Site. The sign indicates that the project is being performed under the New York State Brownfield Cleanup Program.

Pre-Construction Meeting with NYSDEC

A pre-construction meeting will be held with NYSDEC prior to the start of major remedial construction activities.

Emergency Contact Information

An emergency contact sheet with names and phone numbers is included in Table 10. That document will define the specific project contacts for use by NYSDEC and NYSDOH in the case of a day or night emergency.

Remedial Action Costs

The estimated costs of the Remedial Action for both the Track 1 and Track 4 alternatives are included in Table 11. An itemized and detailed summary of costs for all remedial activity will be included in the FER. This will be revised based on actual costs and submitted as an Appendix to the Final Remediation Report.

4.3 SITE PREPARATION

4.3.1 Mobilization

Mobilization tasks will include:

- Construction of temporary facilities and utilities;
- Set-up of construction equipment and facilities;
- Construction of fencing and barriers;
- Construction of erosion control measures; and
- Construction of decontamination and materials staging areas.

4.3.2 Erosion and Sedimentation Controls

Erosion and sediment control measures are outlined in the SWPPP (see Section 4.1.5).

4.3.3 Stabilized Construction Entrance(s)

Traffic control, and measures to prevent cross-contamination of construction equipment, will be addressed in the Site Operations Plan (see Section 4.1.7).

4.3.4 Utility Marker and Easements Layout

The Applicant and its contractors will be solely responsible for the identification of utilities that might be affected by work under the RAWP and implementation of all required, appropriate, or necessary health and safety measures during performance of work under this RAWP. The Applicant and its contractors are solely responsible for safe execution of all invasive and other work performed under this RAWP. The Applicant and its contractors will obtain any local, State or Federal permits or approvals pertinent to such work that may be required to perform work under this RAWP. Approval of this RAWP by NYSDEC does not constitute satisfaction of these requirements.

The presence of utilities and easements on the Site has been investigated by the Remedial Engineer. It has been determined that no risk or impediment to the planned work under this Remedial Action Work Plan is posed by utilities or easements on the Site.

4.3.5 Sheeting and Shoring

Appropriate management of structural stability of on-Site or off-Site structures during on-Site activities include excavation is the sole responsibility of the Applicant and its contractors. The Applicant and its contractors will be solely responsible for safe execution of all invasive and other work performed under this Plan. The Applicant and its contractors will obtain any local, State or Federal permits or approvals that may be required to perform work under this Plan. Further, the Applicant and its contractors are solely responsible for the implementation of all required, appropriate, or necessary health and safety measures during performance of work under the approved Plan.

4.3.6 Equipment and Material Staging

Equipment and material staging areas are expected to be relocated throughout the site during remedial construction. A detailed description of these areas will be included in the Site Operations Plan (see Section 4.1.7).

4.3.7 Decontamination Area

The decontamination area construction and operational requirements are outlined in the HASP.

4.3.8 Site Fencing

A construction safety fence will be installed around the entire perimeter of the site. Access through gates will be provided at various points as required by the Applicant and its contractors. These gates will be locked during non-construction hours.

4.3.9 Demobilization

Demobilization will include the following :

- Restoration of areas that may have been disturbed to accommodate support areas (e.g., staging areas, decontamination areas, storage areas, temporary water management area[s], and access area);
- Removal of temporary access areas (whether on-Site or off-Site) and restoration of disturbed access areas to pre-remediation conditions;
- Removal of sediment and erosion control measures and disposal of materials in accordance with acceptable rules and regulations;
- Equipment decontamination;
- General refuse disposal.

4.4 REPORTING

All daily and monthly Reports will be included in the Final Engineering Report.

4.4.1 Daily Reports

Daily reports will be submitted to NYSDEC and NYSDOH Project Managers by the end of each day following the reporting period and will include:

- An update of progress made during the reporting day;
- Locations of work and quantities of material imported and exported from the Site;
- References to alpha-numeric map for Site activities;
- A summary of any and all complaints with relevant details (names, phone numbers);

- A summary of CAMP finding, including excursions;
- An explanation of notable Site conditions.

Daily reports are not intended to be the mode of communication for notification to the NYSDEC of emergencies (accident, spill), requests for changes to the RAWP or other sensitive or time critical information. However, such conditions must also be included in the daily reports. Emergency conditions and changes to the RAWP will be addressed directly to NYSDEC Project Manager via personal communication.

Daily Reports will include a description of daily activities keyed to an alpha-numeric map for the Site that identifies work areas. These reports will include a summary of air sampling results, odor and dust problems and corrective actions, and all complaints received from the public.

A Site map that shows a predefined alpha-numeric grid for use in identifying locations described in reports submitted to NYSDEC is attached in Figure7.

The NYSDEC assigned project number will appear on all reports.

4.4.2 Monthly Reports

Monthly reports will be submitted to NYSDEC and NYSDOH Project Managers within one week following the end of the month of the reporting period and will include:

- Activities relative to the Site during the previous reporting period and those anticipated for the next reporting period, including a quantitative presentation of work performed (i.e. tons of material exported and imported, etc.);
- Description of approved activity modifications, including changes of work scope and/or schedule;
- Sampling results received following internal data review and validation, as applicable; and,
- An update of the remedial schedule including the percentage of project completion, unresolved delays encountered or anticipated that may affect the future schedule, and efforts made to mitigate such delays.

4.4.3 Other Reporting

Photographs will be taken of all remedial activities and submitted to NYSDEC in digital (JPEG) format. Photos will illustrate all remedial program elements and will be of acceptable quality. Representative photos of the Site prior to any Remedial Actions will be provided.

Representative photos will be provided of each contaminant source, source area and Site structures before, during and after remediation. Photos will be submitted to NYSDEC on CD or other acceptable electronic media and will be sent to NYSDEC's Project Manager (2 copies) and to NYSDOH's Project Manager (1 copy). CD's will have a label and a general file inventory structure that separates photos into directories and sub-directories according to logical Remedial Action components. A photo log keyed to photo file ID numbers will be prepared to provide explanation for all representative photos. For larger and longer projects, photos should be submitted on a monthly basis or another agreed upon time interval.

Job-site record keeping for all remedial work will be appropriately documented. These records will be maintained on-Site at all times during the project and be available for inspection by NYSDEC and NYSDOH staff.

4.4.4 Complaint Management Plan

A public information board will be constructed at the perimeter of the Site. This information board will contain the phone number of the Applicant where complaints may be directed. General information notices to the public will also be posted on this board for their benefit.

4.4.5 Deviations from the Remedial Action Work Plan

If there are any deviations from the RAWP, the following steps will be taken:

- Reasons for deviating from the approved RAWP will be identified and communicated directly to the NYSDEC Project Manager;
- All deviations will be communicated verbally and in writing (by letter or email) to the NYSDEC Project Manager;
- The deviations will be implemented based on verbal or written approval of the NYSDEC Project Manger. All verbal approvals will be followed-up in writing.
- The effect of the deviations on the overall remedy will be described/addressed in the Final Engineering Report.

5.0 REMEDIAL ACTION: MATERIAL REMOVAL FROM SITE

Removal of all contaminated media (soil, water, structures, etc) under the Remedial Action will be implemented in accordance with the site-specific Construction Quality Assurance Plan (CQAP) and the Quality Assurance Project Plan (QAPP). The CQAP is included as Appendix 9 and includes a description and identification (including a map) of: the location of remedial treatment units; the volume of each environmental medium to be remediated; the location, depth and concentration of all contaminants in excess of the remediation standard; sample locations, depths and parameters for all post-construction samples. The Quality Assurance Project Plan describing the proposed sampling and analytical methods and a list of all required permits (or substantive permit requirements) is included as Appendix 8.

A plan depicting the surface topography and the locations where the excavation activities will be carried out are included as Figures 11 and 12, respectively. A summary of the location, depth and concentration of all contaminants in excess of the remediation standard are included in Table 12.

5.1 SOIL CLEANUP OBJECTIVES

The Soil Cleanup Objectives for this Site are listed in Table 6.

Soil and materials management on-Site and off-Site will be conducted in accordance with the Soil Management Plan as described below.

Table 3 summarizes all soil samples that exceed the SCOs proposed for this Remedial Action. A spider map that shows all soil samples that exceed the SCOs proposed for this Remedial Action is shown in Figure 8.

UST closures will, at a minimum, conform to criteria defined in DER-10.

5.2 REMEDIAL PERFORMANCE EVALUATION (POST EXCAVATION END-POINT SAMPLING)

5.2.1 End-Point Sampling Frequency

For all excavations, post-excavation soil and groundwater samples will be collected in accordance with Section 5.4 of DER-10.

5.2.2 Methodology

Soil samples will be collected in accordance with the QAPP using disposable gloves/trowels or dedicated, decontaminated stainless steel spoons. Groundwater samples will be collected from open excavations either using disposable bailers or, where appropriate, directly into the sampling jars.

5.2.3 Reporting of Results

The samples will either be submitted to a NYSDOH certified laboratory. The results will be reported in accordance with NYSDEC requirements for Category B data deliverables (as outlined in DER-10).

5.2.4 QA/QC

Collection of QA/QC samples to evaluate potential cross-contamination from sampling equipment and during shipment of samples and repeatability of laboratory analytical practices will be in accordance with the QAPP included as Appendix 8. Field blanks, trip blanks and duplicate samples associated with daily sampling activities will be collected as a part of the QA/QC practices.

5.2.5 DUSR

To ensure that the field sampling and laboratory analytical practices are acceptable, the data associated with all the samples will be validated by a third party (in accordance with requirements of DER-10). The validation approach and results will be presented in a DUSR to be included in the FER.

5.2.6 Reporting of End-Point Data in FER

The FER will include a table of end point data with highlights or a summary of exceedances of SCOs. A spider map showing all SCO exceedances will also be presented in the FER .

Chemical labs used for all end-point sample results and contingency sampling will be NYSDOH ELAP certified.

End point sampling, including bottom and side-wall sampling, will be performed in accordance with DER-10 sample frequency requirements. Side-wall samples will be collected a minimum of every 30 linear feet. Bottom samples will be collected at a rate of one for every 900 square feet. For relatively large excavations an alternate reduced sampling frequency as approved by NYSDEC will be utilized. The FER will provide a tabular and map summary of all end-point sample results and exceedances of SCOs.

5.3 ESTIMATED MATERIAL REMOVAL QUANTITIES

Source removal excavation activities and other soil excavation will be implemented during the course of the redevelopment activities within the proposed building footprints and to a limited extent within roadway and landscaped areas. A plan depicting the cut and fill thicknesses is included as Figure 13. The estimated quantity of soil/fill to be removed from the Site is 22,000 tons. The estimated quantity of soil to be imported into the Site for backfill and cover soil is 17,000 tons. Concord Associates plans to reuse most of the excavated soil from OU-1A, below the "cap" (in accordance with the Site-specific Beneficial Use Determination pending approval by the NYSDEC). The estimated quantity of soil/fill expected to be reused/relocated on Site is 20,000 tons.

5.4 SOIL/MATERIALS MANAGEMENT PLAN

Approximately 22,000 tons of material is required to be excavated during construction activities. The required fill will either consist of previously excavated soil in accordance with the Site-specific Beneficial Use Determination or imported clean fill. Refer to Figures 5 and 11 for the Site Cross Sections and the anticipated cut/fill analysis. A Site Management Plan will be developed after implementation of the remedy to manage any residual contaminated soils in the future.

5.4.1 Soil Screening Methods

Visual, olfactory and PID soil screening and assessment will be performed by a qualified environmental professional during all remedial and development excavations into known or potentially contaminated material (Residual Contamination Zone). Soil screening will be performed regardless of when the invasive work is done and will include all excavation and invasive work performed during the remedy and during development phase, such as excavations for foundations and utility work, prior to issuance of the COC.

All primary contaminant sources (including but not limited to tanks and hotspots) identified during Site Characterization, Remedial Investigation, and Remedial Action will be surveyed by a surveyor licensed to practice in the State of New York. This information will be provided on maps in the Final Engineering Report.

Screening will be performed by qualified environmental professionals. Resumes will be provided for all personnel responsible for field screening (i.e. those representing the Remedial Engineer) of invasive work for unknown contaminant sources during remediation and development work.

5.4.2 Stockpile Methods for Contaminated Soils

Stockpiles will be inspected at a minimum once each week and after every storm event. Results of inspections will be recorded in a logbook and maintained at the Site and available for inspection by NYSDEC.

Stockpiles will be kept covered at all times with appropriately anchored tarps. Stockpiles will be routinely inspected and damaged tarp covers will be promptly replaced.

Soil stockpiles will be continuously encircled with silt fences. Hay bales will be used as needed near catch basins, surface waters and other discharge points.

A dedicated water truck equipped with a water cannon will be available on-Site, as needed, for dust control.

5.4.3 Materials Excavation and Load Out

The Remediation Engineer or a qualified environmental professional under his/her supervision will oversee all invasive work and the excavation and load-out of all excavated material.

The Applicant and its contractors are solely responsible for safe execution of all invasive and other work performed under this Plan.

The presence of utilities and easements on the Site has been investigated by the Remedial Engineer. It has been determined that no risk or impediment to the planned work under this Remedial Action Work Plan is posed by utilities or easements on the Site.

Loaded vehicles leaving the Site will be appropriately lined, tarped, securely covered, manifested, and placarded in accordance with appropriate Federal, State, local, and NYSDOT requirements (and all other applicable transportation requirements).

A truck wash associated with construction activities adjacent to OU-1A is currently operational. The Remediation Engineer will be responsible for ensuring that all outbound trucks will be washed at the truck wash before leaving the Site until the remedial construction is complete.

Locations where vehicles enter or exit the Site will be inspected daily for evidence of off-Site sediment tracking.

The Remediation Engineer will ensure that all egress points for truck and equipment transport from the Site will be clean of dirt and other materials derived from the Site during Site remediation and development. Cleaning of the adjacent streets will be performed as needed to maintain a clean condition with respect to Site -derived materials.

The Applicant and associated parties preparing the remedial documents submitted to the State, and parties performing this work, are completely responsible for the safe performance of all invasive work, the structural integrity of excavations, and for structures that may be affected by excavations (such as building foundations and bridge footings).

The Remedial Engineer will ensure that Site development activities will not interfere with, or otherwise impair or compromise, remedial activities proposed in this Remedial Action Work Plan.

Each hotspot and structure to be remediated (USTs, vaults and associated piping, transformers, etc.) will be removed and end-point remedial performance sampling completed before excavations related to Site development commence proximal to the hotspot or structure.

Development-related grading cuts and fills will not be performed without NYSDEC approval and will not interfere with, or otherwise impair or compromise, the performance of remediation required by this plan.

Mechanical processing of historical fill and contaminated soil on-Site is prohibited.

All primary contaminant sources (including but not limited to tanks and hotspots) identified during Site Characterization, Remedial Investigation, and Remedial Action will be surveyed by a surveyor licensed to practice in the State of New York. The survey information will be shown on maps to be reported in the Final Engineering Report. End point sampling of these source removal areas will be documented in the FER.

5.4.4 Materials Transport Off-Site

All transport of materials will be performed by licensed haulers in accordance with appropriate local, State, and Federal regulations, including 6 NYCRR Part 364. Haulers will be appropriately licensed and trucks properly placarded.

Truck transport routes will be included in the SOP. All trucks loaded with Site materials will exit the vicinity of the Site using only these approved truck routes.

Proposed in-bound and out-bound truck routes to the Site will take into account: (a) limiting transport through residential areas and past sensitive sites; (b) use of city mapped truck routes; (c) prohibiting off- Site queuing of trucks entering the facility; (d) limiting total distance to major highways; (e) promoting safety in access to highways; (f) overall safety in transport; and (g) community input, which was sought and obtained during the SEQRA EIS process

Trucks will be prohibited from stopping and idling in the neighborhood outside the project Site.

Egress points for truck and equipment transport from the Site will be kept clean of dirt and other materials during Site remediation and development.

Queuing of trucks will be performed on-Site in order to minimize off-Site disturbance. Off-Site queuing will be prohibited.

Material transported by trucks exiting the Site will be secured with tight-fitting covers. Loose-fitting canvas-type truck covers will be prohibited. If loads contain wet material capable of producing free liquid, truck liners will be used.

All truck tires will be washed prior to leaving the Site. Truck wash waters will be collected and disposed of off-Site in an appropriate manner.

5.4.5 Materials Disposal Off-Site

The disposal locations are included in the CQAP. JM Associates, one of the environmental contractors for the Site, plans to dispose of impacted soil at Deep Green of New York (TPST Soil Recyclers of New York, Inc.), located at 1106 River Road, New Windsor, New York. Disposal locations established at a later date will be reported to the NYSDEC Project Manager.

The total quantity of material expected to be disposed off-Site is 2,400 tons.

All soil/fill/solid waste excavated and removed from the Site will be treated as contaminated and regulated material and will be disposed in accordance with all local, State (including 6NYCRR Part 360) and Federal regulations. If disposal of soil/fill from this Site is proposed for unregulated disposal (i.e. clean soil removed for development purposes), a formal request with an associated plan will be made to NYSDEC's Project Manager. Unregulated off-Site management of materials from this Site will not be undertaken without formal NYSDEC approval.

Material that does not meet Track 1 unrestricted SCOs is prohibited from being taken to a New York State recycling facility (6NYCRR Part 360-16 Registration Facility).

The following documentation will be obtained and reported by the Remedial Engineer for each disposal location used in this project to fully demonstrate and document that the disposal of material derived from the Site conforms with all applicable laws: (1) a letter from the Remedial Engineer or BCP Applicant to the receiving facility describing the material to be disposed and requesting formal written acceptance of the material. This letter will state that material to be disposed is contaminated material generated at an environmental remediation Site in New York State. The letter will provide the project identity and the name and phone number of the Remedial Engineer. The letter will include as an attachment a summary of all chemical data for the material being transported (including Site Characterization data); and (2) a letter from all receiving facilities stating it is in receipt of the correspondence (above) and is approved to accept the material. These documents will be included in the FER.

Non-hazardous historic fill and contaminated soils taken off-Site will be handled, at minimum, as a Municipal Solid Waste per 6NYCRR Part 360-1.2

Historical fill and contaminated soils from the Site are prohibited from being disposed at Part 360-16 Registration Facilities (also known as Soil Recycling Facilities).

Soils that are contaminated but non-hazardous and are being removed from the Site are considered by the Division of Solid & Hazardous Materials (DSHM) in NYSDEC to be Construction and Demolition (C/D) materials with contamination not typical of virgin soils. These soils may be sent to a permitted Part 360 landfill. They may be sent to a permitted C/D processing facility without permit modifications only upon prior notification of NYSDEC Region 2 DSHM. This material is prohibited from being sent or redirected to a Part 360-16 Registration Facility. In this case, as dictated by DSHM, special procedures will include, at a minimum, a letter to the C/D facility that provides a detailed explanation that the material is derived from a DER remediation Site, that the soil material is contaminated and that it must not be redirected to on-Site or off-Site Soil Recycling Facilities. The letter will provide the project identity and the name and phone number of the Remedial Engineer. The letter will include as an attachment a summary of all chemical data for the material being transported.

The Final Engineering Report will include an accounting of the destination of all material removed from the Site during this Remedial Action, including excavated soil, contaminated soil, historic fill, solid waste, and hazardous waste, non-regulated material, and fluids. Documentation associated with disposal of all material must also include records and approvals for receipt of the material. This information will also be presented in a tabular form in the FER.

Bill of Lading system or equivalent will be used for off-Site movement of non-hazardous wastes and contaminated soils. This information will be reported in the Final Engineering Report.

Hazardous wastes derived from on-Site will be stored, transported, and disposed of in full compliance with applicable local, State, and Federal regulations.

Appropriately licensed haulers will be used for material removed from this Site and will be in full compliance with all applicable local, State and Federal regulations.

Waste characterization will be performed for off-Site disposal in a manner suitable to the receiving facility and in conformance with applicable permits. Sampling and analytical methods, sampling frequency, analytical results and QA/QC will be reported in the FER. All data available for soil/material to be disposed at a given facility must be submitted to the disposal facility with suitable explanation prior to shipment and receipt.

5.4.6 Materials Reuse On-Site

Soil excavated during the remedial implementation and site redevelopment, based on known information about on-site contamination distribution and field screening results, will be managed as three waste streams:

1. Unrestricted on-site reuse (material below Restricted Use-Protection of Groundwater and Restricted Use-Commercial SCOs);
2. On-site reuse under an impermeable cap (soil that is not grossly impacted and soil that is not impacted at concentrations that significantly exceed Restricted Use-Commercial) in accordance with the pending BUD approval; and
3. Off-site disposal (grossly impacted soil and soil that is impacted at concentrations that significantly exceed Restricted Use-Commercial)

Chemical criteria for on-Site reuse and imported material are listed in Table 6. The logistics of the soil handling (i.e., location and size of the soil staging areas) will be included in the SOP.

The Remedial Engineer will ensure that procedures defined for materials reuse in this RAWP are followed and that unacceptable material will not remain on-Site.

Acceptable demolition material proposed for reuse on-Site, if any, will be sampled for asbestos. Organic matter (wood, roots, stumps, etc.) or other solid waste derived from clearing and grubbing of the Site is prohibited for reuse on-Site.

Contaminated on-Site material, including historic fill and contaminated soil, removed for grading or other purposes will not be reused within a cover soil layer, within landscaping berms, or as backfill for subsurface utility lines. This will be outlined in the final Site Management Plan.

5.4.7 Fluids Management

All liquids to be removed from the Site, including dewatering fluids, will be handled, transported and disposed in accordance with applicable local, State, and Federal regulations. Liquids discharged into the sewer system will be addressed through approval by local utility authority and NYSDEC. Dewatered fluids will not be recharged back to the land surface or subsurface of the Site.

Water generated during remedial construction will not be discharged to surface waters (i.e. a local pond, stream or river) without a SPDES permit.

5.4.8 Demarcation

A land survey will be performed by a New York State licensed surveyor, of areas that require "clean cover soil," after the completion of related construction activities. The survey will define the top elevation of residual contaminated soils. A physical demarcation layer, consisting of orange snow fencing material or equivalent material will be placed, just below the "clean soil cover" in landscaped areas, to provide a visual reference. This demarcation layer will constitute the top of the 'Residuals Management Zone', the zone that requires adherence to special conditions for disturbance of contaminated residual soils defined in the Site Management Plan. The survey will measure the grade covered by the demarcation layer before the placement of cover soils, pavement and sub-soils, structures, or other materials. This survey and the demarcation layer placed on this grade surface will constitute the physical and written record of the upper surface of the 'Residuals Management Zone' in the Site Management Plan. A map showing the survey results will be included in the Final Remediation Report and the Site Management Plan.

5.4.9 Backfill from Off-Site Sources

A plan depicting the locations where soil backfilling operations will be required is included as Figure 14. For off-site non-virgin borrow material imported to be used on-site as backfill, one composite sample will be collected per 500 cubic yards of material from each source area. If more than 1,000 cubic yards of soil are borrowed from a given off-site non-virgin soil source area and both samples of the first 1,000 cubic yards meet the site-specific Restricted Use SCOs, the sample frequency will be reduced to one composite for every 2,500 cubic yards of additional soils from the same source, up to 5,000 cubic yards. For borrow sources greater than 5,000 cubic yards, sampling frequency may be reduced to one sample per 5,000 cubic yards, provided all earlier samples met the site-specific Restricted Use SCOs. The samples will be analyzed for target compound list (TCL) volatile organic compounds (VOCs), TCL Semi-Volatile Organic Compounds (SVOCs), pesticides, PCBs, and TAL metals, including cyanide. The soil may be used as cover material provided that all parameters meet the site specific Restricted Use SCOs, per the NYSDEC regulatory requirements. A table summarizing the backfill sampling protocol is included as Table 13.

All materials proposed for import onto the Site, will meet the Commercial and Protection of Groundwater Soil Cleanup Objectives, will be approved by the Remedial Engineer and will be in compliance with provisions in this RAWP prior to receipt at the Site. Bills of Lading or equivalent documentation will be obtained to track the amount soil arriving onto the Site and verify the source of soil being imported.

Material from industrial sites, spill sites, other environmental remediation sites or other potentially contaminated sites will not be imported to the Site.

The Final Engineering Report will include the following certification by the Remedial Engineer: "I certify that all import of soils from off-Site, including source evaluation, approval and sampling, has been performed in a manner that is consistent with the methodology defined in the Remedial Action Work Plan".

All imported soils will meet NYSDEC approved backfill or cover soil quality objectives for this Site. These NYSDEC approved backfill or cover soil quality objectives are listed in Table 6. Non-compliant soils will not be imported onto the Site without prior approval by NYSDEC. Nothing in the approved Remedial Action Work Plan or its approval by NYSDEC will be construed as an approval for this purpose.

Soils that meet 'exempt' fill requirements under 6 NYCRR Part 360, but do not meet backfill or cover soil objectives for this Site, will not be imported onto the Site without prior approval by NYSDEC. Nothing in this Remedial Action Work Plan will be construed as an approval for this purpose.

Solid waste will not be imported onto the Site.

Trucks entering the Site with imported soils will be securely covered with tight fitting covers.

5.4.10 Stormwater Pollution Prevention Plan

A summary of the Stormwater Pollution Prevention Plan (SWPPP) (associated only with the on-site construction activities) that conforms to the requirements of NYSDEC Division of Water guidelines and NYS regulations has already been submitted to the NYSDEC and approved.

Barriers and hay bale checks will be installed and inspected once a week and after every storm event. Results of inspections will be recorded in a logbook and maintained at the Site and available for inspection by NYSDEC. All necessary repairs shall be made immediately.

Accumulated sediments will be removed as required to keep the barrier and hay bale check functional.

All undercutting or erosion of the silt fence toe anchor shall be repaired immediately with appropriate backfill materials.

Manufacturer's recommendations will be followed for replacing silt fencing damaged due to weathering.

Erosion and sediment control measures identified in the RAWP shall be observed to ensure that they are operating correctly. Where discharge locations or points are accessible, they shall be inspected to ascertain whether erosion control measures are effective in preventing significant impacts to receiving waters

Silt fencing or hay bales will be installed around the entire perimeter of the remedial construction area or as required by the SWPPP.

5.4.11 Contingency Plan

If underground tanks or other previously unidentified contaminant sources are found during on-Site remedial excavation or development related construction, sampling will be performed on product, sediment and surrounding soils, etc. Chemical analytical work will be for full scan parameters (TAL metals; TCL volatiles and semi-volatiles, TCL pesticides and PCBs). These analyses will not be limited to STARS parameters where tanks are identified without prior approval by NYSDEC. Analyses will not be otherwise limited without NYSDEC approval.

Identification of unknown or unexpected contaminated media identified by screening during invasive Site work will be promptly communicated by phone to NYSDEC's Project Manager. These findings will be also included in daily and periodic electronic media reports.

5.4.12 Community Air Monitoring Plan

A copy of the CAMP for the Site is included as Appendix 7. A map showing the location of fixed and mobile sampling stations is shown in Figure 15.

Exceedances observed in the CAMP will be reported to NYSDEC and NYSDOH Project Managers and included in the Daily Report.

5.4.13 Odor, Dust and Nuisance Control Plan

Odor, dust and nuisance control will be in accordance with the site specific Health and Safety Plan included as Appendix 7.

The Final Engineering Report will include the following certification by the Remedial Engineer: "I certify that all invasive work during the remediation and all invasive development work were conducted in accordance with dust and odor suppression methodology defined in the Remedial Action Work Plan."

5.4.13.1 Odor Control Plan

This odor control plan is designed to control emissions of nuisance odors off-Site. If nuisance odors are identified, work will be halted and the source of odors will be identified and corrected. Work will not resume until all nuisance odors have been abated. NYSDEC and NYSDOH will be notified of all odor events and of all other complaints about the project.

Implementation of all odor controls, including the halt of work, will be the responsibility of the Applicant's Remediation Engineer, who is responsible for certifying the Final Engineering Report.

All necessary means will be employed to prevent on- and off-Site nuisances. At a minimum, procedures will include: (a) limiting the area of open excavations; (b) shrouding open excavations with tarps and other covers; and (c) using foams to cover exposed odorous soils. If odors develop and cannot be otherwise controlled, additional means to eliminate odor nuisances will include: (d) direct load-out of soils to trucks for off-Site disposal; (e) use of chemical deodorants in spray or misting systems; and, (f) use of staff to monitor odors in surrounding neighborhoods.

Where odor nuisances have developed during remedial work and cannot be corrected, or where the release of nuisance odors cannot otherwise be avoided due to on-Site conditions or close proximity to sensitive receptors, odor control will be achieved, as appropriate, by a combination of work stoppages, sheltering excavation and handling areas under tented containment structures equipped with appropriate air venting/filtering systems.

5.4.13.2 Dust Control Plan

A dust suppression plan that addresses dust management during invasive on-Site work, will include, at a minimum, the items listed below:

- Dust suppression will be achieved though the use of a dedicated on-Site water truck for road wetting. The truck will be equipped with a water cannon capable of spraying water directly onto off-road areas including excavations and stockpiles.
- Clearing and grubbing will be done in stages to limit the area of exposed, unvegetated soils vulnerable to dust production.
- Gravel will be used on roadways to provide a clean and dust-free road surface.
- On-Site roads will be limited in total area to minimize the area required for water truck sprinkling.

5.4.13.3 Other Nuisances

A plan for rodent control will be developed and utilized by the contractor prior to and during Site clearing and Site grubbing, and during all remedial work.

A plan will be developed and utilized by the contractor for all remedial work and will conform, at a minimum, to local noise control standards.

6.0 RESIDUAL CONTAMINATION TO REMAIN ON-SITE

Since residual contaminated soil and groundwater, and potentially soil vapor will exist beneath the Site after the remedy is complete, Engineering and Institutional Controls (ECs and ICs) are required to protect human health and the environment. These ECs and ICs are described in the sections to follow. Long-term management of EC/ICs and of residual contamination will be described in a Site specific Site Management Plan (SMP) that will be developed and included in the FER, and will run with the land in an environmental easement that must be implemented by all future owners of the site until such time as unrestricted Track 1 cleanup levels are achieved.

ECs will be implemented to protect public health and the environment by appropriately managing residual contamination. The Controlled Property (the Site) will have two (2) primary EC systems. These are: (1) a composite cover system consisting of asphalt covered roads, concrete covered sidewalks, concrete building slabs and "clean soil cover" in landscaped areas; and (2) Implementing a free product removal and "monitored natural attenuation" program, to monitor/address the free product and low level dissolved groundwater impacts. A plan depicting the locations of these EC systems is included as Figure 16.

The FER will report residual contamination on the Site in tabular and map form. This will include presentation of exceedances of both Track 1 and Track 4 SCOs.

7.0 ENGINEERING CONTROLS

7.1 COMPOSITE COVER SYSTEM

Exposure to residual contaminated soils will be prevented by an engineered, composite cover system that will be built on the Site. This composite cover system will be comprised of asphalt covered roads, concrete covered sidewalks, concrete building slabs and "clean soil cover" in landscaped areas.

A diagram showing the design detail for each cover type is shown in Figure 17.

A map showing the aerial distribution of each of the cover types to be built at the Site is included in Figure 18.

A Soil and Underground StructureManagement Plan will be included in the Site Management Plan and will outline the procedures to be followed in the event that the composite cover system and underlying residual contamination are disturbed after the Remedial Action is complete.

Maintenance of this composite cover system will be described in the Site Management Plan in the FER.

7.2 GROUNDWATER MONITORING SYSTEM

The existing network of groundwater monitoring wells (see Figure 19) will be utilized to monitor the groundwater quality and the free-phase product (suspected to be degraded #4 fuel oil) plume. As the dissolved groundwater impacts detected during the remedial investigation are relatively low and the free-phase product is relatively immobile (due to its high viscosity), a free-phase product recovery system (discussed below), long-term monitoring program with associated institutional controls will be a cost effective remedial alternative to address these impacts.

Specifically, the monitoring wells will be gauged for the presence/thickness of free-phase product annually. Groundwater samples will be collected annually, in accordance with requirement outlined in DER-10. The groundwater samples will be analyzed for VOCs, SVOCs and pesticides.

This monitoring protocol will be described in the Site Management Plan in the FER.

7.3 FREE-PHASE PRODUCT RECOVERY SYSTEM

The free-product recovery, from strategically placed recovery wells (see Figure 19), will be undertaken utilizing a vacuum truck. The recovery events will be undertaken periodically, depending on the amount of free phase product and the recharge rates. Depending on the free-product yield during a given recovery event and subsequent strength of free-phase product flow into the recovery wells, the frequency of the recovery events will be determined.

7.3 CRITERIA FOR COMPLETION OF REMEDIATION/TERMINATION OF REMEDIAL SYSTEMS

Composite Cover System

The composite cover system is a permanent control and the quality and integrity of this system will be inspected at defined, regular intervals in perpetuity or until Track 1 cleanup standards are achieved.

Groundwater Monitoring

Groundwater monitoring activities to assess groundwater quality will continue, as determined by NYSDOH and NYSDEC, until residual groundwater concentrations are found to be below NYSDEC standards or have become asymptotic over an extended period. Monitoring will continue until permission to discontinue is granted in writing by NYSDEC and NYSDOH. Groundwater monitoring well gauging to monitor the mobility of the free-phase product will be undertaken at defined, regular intervals in perpetuity. These monitoring activities will be outlined in the Monitoring Plan of the SMP.

8.0 INSTITUTIONAL CONTROLS

After the remedy is complete, the Site will have residual contamination remaining in place. Engineering Controls (ECs) for the residual contamination have been incorporated into the remedy to render the overall Site remedy protective of public health and the environment. Two elements have been designed to ensure continual and proper management of residual contamination in perpetuity and/or until Track 1 cleanup objectives have been achieved: an Environmental Easement and a Site Management Plan. These elements are described in this Section. A Site -specific Environmental Easement will be recorded with Sullivan County to provide an enforceable means of ensuring the continual and proper management of residual contamination and protection of public health and the environment in perpetuity or until released in writing by NYSDEC through achievement of the Track 1 objectives. It requires that the grantor of the Environmental Easement and the grantor's successors and assigns adhere to all Engineering and Institutional Controls (ECs/ICs) placed on this Site by this NYSDEC-approved remedy. ICs provide restrictions on Site usage and mandate operation, maintenance, monitoring and reporting measures for all ECs and ICs. The Site Management Plan (SMP) will describe appropriate methods and procedures to ensure compliance with all ECs and ICs that are required by the Environmental Easement. Once the SMP has been approved by the NYSDEC, compliance with the SMP is required by the grantor of the Environmental Easement and grantor's successors and assigns.

8.1 ENVIRONMENTAL EASEMENT

An Environmental Easement, as defined in Article 71 Title 36 of the Environmental Conservation Law, is required when residual contamination is left on-Site after the Remedial Action is complete. If the Site will have residual contamination above the Track 1 SCOs after completion of all Remedial Actions then an Environmental Easement is required. As part of this remedy, an Environmental Easement approved by NYSDEC will be filed and recorded with the Sullivan County Clerk. The Environmental Easement will be submitted as part of the Final Engineering Report.

The Environmental Easement renders the Site a Controlled Property. The Environmental Easement will be recorded with the Sullivan County Clerk before the Certificate of Completion is issued by NYSDEC. A series of Institutional Controls are required under this remedy to implement, maintain and monitor these Engineering Control systems, prevent future exposure to residual contamination by controlling disturbances of the subsurface soil and restricting the use of the Site to commerical use only. These Institutional Controls are requirements or restrictions placed on the Site that are listed in, and required by, the Environmental Easement. Institutional Controls can, generally, be subdivided between controls that support Engineering Controls, and those that place general restrictions on Site usage or other requirements. Institutional Controls in both of these groups are closely integrated with the Site Management Plan, which provides all of the methods and procedures to be followed to comply with this remedy.

The Institutional Controls that support Engineering Controls are:

- Compliance with the Environmental Easement by the Grantee and the Grantee's successors and adherence of all elements of the SMP is required;
- All Engineering Controls must be operated and maintained as specified in this SMP;
- A composite cover system consisting of asphalt covered roads, concrete covered sidewalks, and concrete building slabs must be inspected, certified and maintained as required in the SMP;
- All Engineering Controls on the Controlled Property will be inspected and certified at a frequency and in a manner defined in the SMP;
- Groundwater, soil vapor and other environmental or public health monitoring will be performed as defined in the SMP;
- Data and information pertinent to Site Management for the Controlled Property will be reported at the frequency and in a manner to be defined in the SMP;
- On-Site environmental monitoring devices, including but not limited to, groundwater monitor wells and soil vapor probes, will be protected and replaced as necessary to ensure proper functioning in the manner specified in the SMP;
- Engineering Controls may not be discontinued without an amendment or extinguishment of the Environmental Easement.

Adherence to these Institutional Controls for the Site is mandated by the Environmental Easement and will be implemented under the Site Management Plan (discussed in the next section). The Controlled Property (Site) will also have a series of Institutional Controls in the form of Site restrictions and requirements. The Site restrictions that apply to the Controlled Property are:

- Vegetable gardens and farming on the Controlled Property are prohibited;
- Use of groundwater underlying the Controlled Property is prohibited without treatment rendering it safe for intended purpose;
- All future activities on the Controlled Property that will disturb residual contaminated material are prohibited unless they are conducted in accordance with the soil management provisions in the Site Management Plan;

- The Controlled Property may be used for restricted residential or commercial use only, provided the long-term Engineering and Institutional Controls included in the Site Management Plan are employed;
- The Controlled Property may not be used for a higher level of use, such as restricted residential use without an amendment or extinguishment of this Environmental Easement;
- Grantor agrees to submit to NYSDEC a written statement that certifies, under penalty of perjury, that: (1) controls employed at the Controlled Property are unchanged from the previous certification or that any changes to the controls were approved by the NYSDEC; and, (2) nothing has occurred that impairs the ability of the controls to protect public health and environment or that constitute a violation or failure to comply with the SMP. NYSDEC retains the right to access such Controlled Property at any time in order to evaluate the continued maintenance of any and all controls. This certification shall be submitted annually, or an alternate period of time that NYSDEC may allow. This annual statement must be certified by an expert that the NYSDEC finds acceptable.

8.2 SITE MANAGEMENT PLAN

Site Management is the last phase of remediation and begins with the approval of the Final Engineering Report and issuance of the Certificate of Completion (COC) for the Remedial Action. The Site Management Plan is submitted as part of the FER but will be written in a manner that allows its removal and use as a complete and independent document. Site Management continues in perpetuity or until released in writing by NYSDEC. The property owner is responsible to ensure that all Site Management responsibilities defined in the Environmental Easement and the Site Management Plan are performed.

The SMP is intended to provide a detailed description of the procedures required to manage residual contamination left in place at the Site following completion of the Remedial Action in accordance with the BCA with the NYSDEC. This includes: (1) development, implementation, and management of all Engineering and Institutional Controls; (2) development and implementation of monitoring systems and a Monitoring Plan; (3) development of a plan to operate and maintain any treatment, collection, containment, or recovery systems (including, where appropriate, preparation of an Operation and Maintenance Manual); (4) submittal of Site Management Reports, performance of inspections and certification of results, and demonstration of proper communication of Site information to NYSDEC; and (5) defining criteria for termination of treatment system operation.

To address these needs, this SMP will include four plans: (1) an Engineering and Institutional Control Plan for implementation and management of EC/ICs; (2) a Monitoring Plan for implementation of Site Monitoring; (3) an Operation and Maintenance Plan for implementation of remedial collection, containment, treatment, and recovery systems; and (4) a Site Management Reporting Plan for submittal of data, information, recommendations, and certifications to NYSDEC. The SMP will be prepared in accordance with the requirements in NYSDEC Draft DER-10 Technical Guidance for Site Investigation and Remediation, dated December 2002, and the guidelines provided by NYSDEC.

Site management activities, reporting, and EC/IC certification will be scheduled on a certification period basis. The certification period will be annually. The Site Management Plan will be based on a calendar year and will be due for submission to NYSDEC by March 1 of the year following the reporting period.

The Site Management Plan in the Final Remediation Report will include a monitoring plan for groundwater at the down-gradient Site perimeter to evaluate Site -wide performance of the remedy. Appropriately placed groundwater monitor wells will also be installed immediately down-gradient of all volatile organic carbon remediation areas for the purpose of evaluation of the effectiveness of the remedy that is implemented.

No exclusions for handling of residual contaminated soils will be provided in the Site Management Plan (SMP). All handling of residual contaminated material will be subject to provisions contained in the SMP.

9.0 FINAL ENGINEERING REPORT

A Final Engineering Report (FER) and draft Certificate of Completion (COC) will be submitted to NYSDEC following implementation of the Remedial Action defined in this RAWP. The FER provides the documentation that the remedial work required under this RAWP has been completed and has been performed in compliance with this plan. The FER will provide a comprehensive account of the locations and characteristics of all material removed from the Site including the surveyed map(s) of all sources. The Final Engineering Report will include as-built drawings for all constructed elements, certifications, manifests, bills of lading as well as the complete Site Management Plan (formerly the Operation and Maintenance Plan). The FER will provide a description of the changes in the Remedial Action from the elements provided in the RAWP and associated design documents. The FER will provide a tabular summary of all performance evaluation sampling results and all material characterization results and other sampling and chemical analysis performed as part of the Remedial Action. The FER will provide test results demonstrating that all mitigation and remedial systems are functioning properly. The FER will be prepared in conformance with DER-10.

Where determined to be necessary by NYSDEC, a Financial Assurance Plan will be required to ensure the sufficiency of revenue to perform long-term operations, maintenance and monitoring tasks defined in the Site Management Plan and Environmental Easement. This determination will be made by NYSDEC in the context of the Final Engineering Report review.

The Final Remediation Report will include written and photographic documentation of all remedial work performed under this remedy.

The FER will include an itemized tabular description of actual costs incurred during all aspects of the Remedial Action.

The FER will provide a thorough summary of all residual contamination left on the Site after the remedy is complete. Residual contamination includes all contamination that exceeds the Track 1 Unrestricted Use SCO in 6NYCRR Part 375-6. A table that shows exceedances from Track 1 Unrestricted SCOs for all soil/fill remaining at the Site after the Remedial Action and a map that shows the location and summarizes exceedances from Track 1 Unrestricted SCOs for all soil/fill remaining at the Site after the Remedial Action will be included in the FER.

The FER will provide a thorough summary of all residual contamination that exceeds the SCOs defined for the Site in the RAWP and must provide an explanation for why the material was not removed as part of the Remedial Action. A table that shows residual contamination in excess of Site SCOs and a map that shows residual contamination in excess of Site SCOs will be included in the FER.

The Final Engineering Report will include an accounting of the destination of all material removed from the Site, including excavated contaminated soil, historic fill, solid waste, hazardous waste, non-regulated material, and fluids. Documentation associated with disposal of all material must also include records and approvals for receipt of the material. It will provide an accounting of the origin and chemical quality of all material imported onto the Site.

Before approval of a FER and issuance of a Certificate of Completion, all project reports must be submitted in digital form on electronic media (PDF).

9.1 CERTIFICATIONS

The following certification will appear in front of the Executive Summary of the Final Engineering Report. The certification will be signed by the Remedial Engineer Michael St. Pierre who is a Professional Engineer registered in New York State. This certification will be appropriately signed and stamped. The certification will include the following statements:

I, __Michael St. Pierre______, am currently a registered professional engineer licensed by the State of New York. I had primary direct responsibility for implementation of the remedial program for the Concord Hotel and Resort Site (NYSDEC BCA Index No. W3-1004-04-06 Site No. C353008).

I certify that the Site description presented in this FER is identical to the Site descriptions presented in the Environmental Easement, the Site Management Plan, and the Brownfield Cleanup Agreement for Concord Hotel and Resort and related amendments.

I certify that the Remedial Action Work Plan dated September 2008 Stipulations approved by the NYSDEC were implemented and that all requirements in those documents have been substantively complied with.

I certify that the remedial activities were observed by qualified environmental professionals under my supervision and that the remediation requirements set forth in the Remedial Action Work Plan and any other relevant provisions of ECL 27-1419 have been achieved.

I certify that all use restrictions, Institutional Controls, Engineering Controls, and all operation and maintenance requirements applicable to the Site are contained in an Environmental Easement created and recorded pursuant ECL 71-3605 and that all affected local governments, as defined in ECL 71-3603, have been notified that such easement has been recorded. A Site Management Plan has been submitted by the Applicant for the continual and proper operation, maintenance, and monitoring of all Engineering Controls employed at the Site, including the proper maintenance of all remaining monitoring wells, and that such plan has been approved by the NYSDEC.

I certify that the export of all contaminated soil, fill, water or other material from the property was performed in accordance with the Remedial Action Work Plan, and were taken to facilities licensed to accept this material in full compliance with all Federal, State and local laws.

I certify that all import of soils from off-Site, including source approval and sampling, has been performed in a manner that is consistent with the methodology defined in the Remedial Action Work Plan.

I certify that all invasive work during the remediation and all invasive development work were conducted in accordance with dust and odor suppression methodology and soil screening methodology defined in the Remedial Action Work Plan.

I certify that all information and statements in this certification are true. I understand that a false statement made herein is punishable as Class "A" misdemeanor, pursuant to Section 210.45 of the Penal Law.

It is a violation of Article 130 of New York State Education Law for any person to alter this document in any way without the express written verification of adoption by any New York State licensed engineer in accordance with Section 7209(2), Article 130, New York State Education Law.

10.0 SCHEDULE

A schedule of Remedial Actions is included as Table 8. The schedule is broken down into work elements and includes estimated dates for performance of work and deliverables.

CONTRACTORS' LINE & GRADE SOUTH, LLC

SINCE 1973

9 NORTH GOODWIN AVENUE, SUITE 3
ELMSFORD, NEW YORK 10523-3133
914.347.3141 • FAX 914.347.3120
LINEANDGRADE@OPTONLINE.NET

JOHN DeMARIO, PARTNER
GARY ENNIS, PARTNER

NOT AFFILIATED WITH ANY OTHER
LINE AND GRADE COMPANY

April 23, 2008

"Schedule A Description"
Brownfields Cleanup Area "A"

All that certain plot, piece or parcel of land, with the buildings and improvements thereon erected, situate, lying and being in the Town of Thompson, County of Sullivan, and designated as part of Tax Lot 9-1-34.1 as shown on the Official Tax Maps of the Town of Thompson, being more particularly described as follows;

BEGINNINGat a point formed by the intersection of the southerly side of Kiameshia Lake Road, County Route 109 (R.O.W. varies) with the westerly side of Concord Road, County Route 182 (assumed 50' R.O.W.), said point marking the northeasterly corner of the herein described parcel;

THENCE along the westerly side of Concord Road (assumed 50' R.O.W.):

1) South 05-59-33 West a distance of 100.23 feet to a point;

THENCE through Tax Lot 9-1-34.1 the following four-(4) courses and distances;

2) North 80-09-18 West a distance of 267.38 feet to a point;

3) North 70-48-44 West a distance of 379.86 feet to a point;

4) North 50-19-14 West a distance of 261.46 feet to a point;

5) North 39-40-46 East a distance of 100.00 feet to a point along the southerly side of Kiameshia Lake Road, County Route 109;

THENCE along the southerly side of Kiameshia Lake Road, County Route 109 (R.O.W. varies) the following eight-(8) courses and distances;

6) South 47-44-32 East a distance of 89.10 feet to a point;

7) South 53-22-53 East a distance of 64.00 feet to a point;

8) South 50-41-40 East a distance of 90.47 feet to a point;

9) South 68-50-41 East a distance of 141.66 feet to a point;

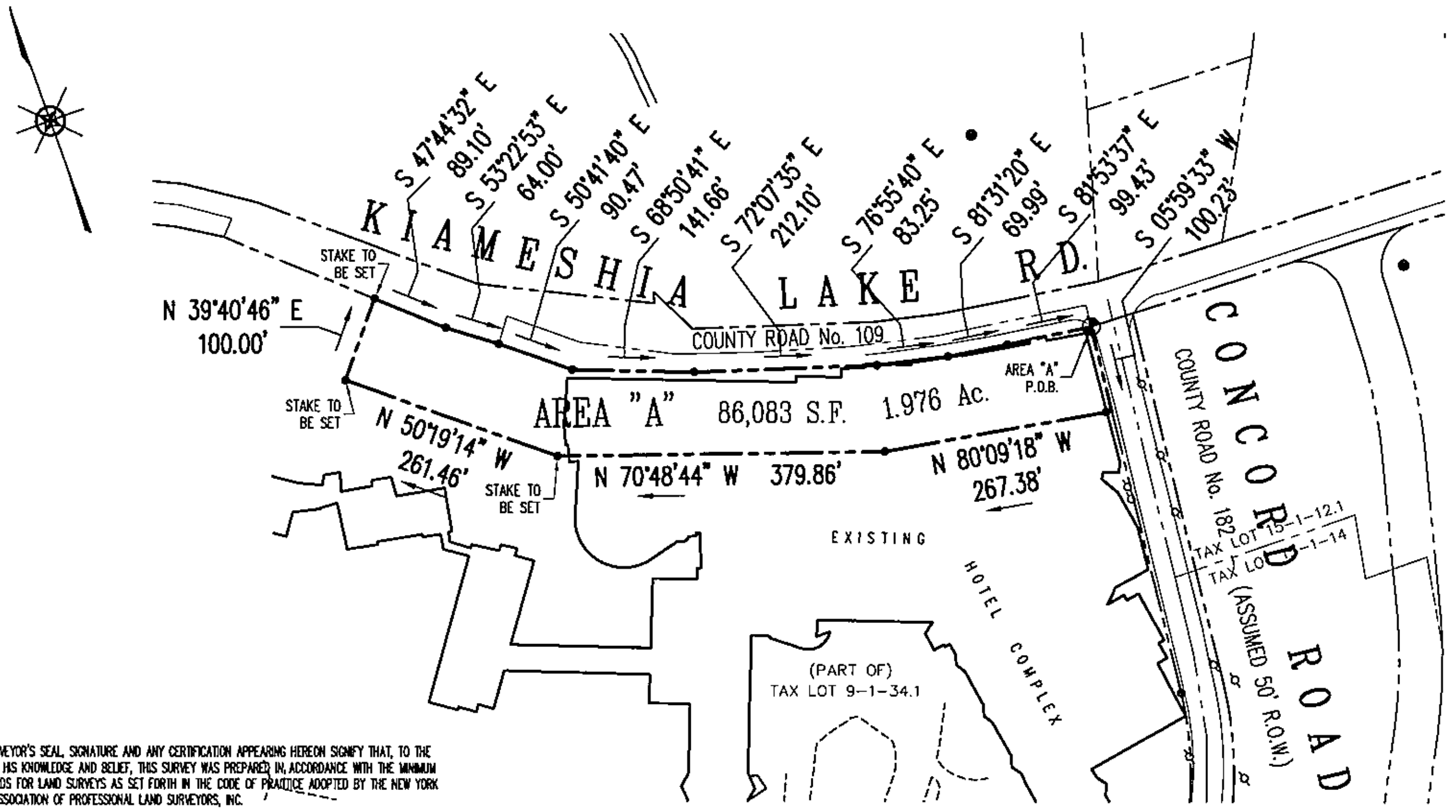
10) South 72-07-35 East a distance of 212.10 feet to a point;

11) South 76-55-40 East a distance of 83.25 feet to a point;

12) South 81-31-20 East a distance of 69.99 feet to a point;

13) South 81-53-37 East a distance of 99.43 to the point and place of BEGINNING.

Containing within said bounds 1.976 Ac. (86,083 S.F.) of land more or less.



THE SURVEYOR'S SEAL, SIGNATURE AND ANY CERTIFICATION APPEARING HEREON SIGNIFY THAT, TO THE BEST OF HIS KNOWLEDGE AND BELIEF, THIS SURVEY WAS PREPARED IN ACCORDANCE WITH THE MINIMUM STANDARDS FOR LAND SURVEYS AS SET FORTH IN THE CODE OF PRACTICE ADOPTED BY THE NEW YORK STATE ASSOCIATION OF PROFESSIONAL LAND SURVEYORS, INC.

THE PURPOSE OF THIS MAP IS TO INDICATE THE AREA (BOUNDED BY THE METES AND BOUNDS SHOWN ON THIS MAP) INCLUDED FOR A BROWNSFIELD SUBMISSION. THE METES AND BOUNDS OF THE BOUNDARY SHOWN IN THIS MAP DOES NOT INDICATED OWNERSHIP FOR WHOM THIS MAP IS PREPARED AND IS UNLAWFULL FOR USE IN TRANSFER OF TITLE.

UNDERGROUND IMPROVEMENTS, STRUCTURES, UTILITIES OR ENCROACHMENTS, AND ANY EASEMENTS RELATED THERETO, ARE NOT SHOWN HEREON UNLESS OTHERWISE NOTED. ANY UNDERGROUND UTILITIES SHOWN HAVE BEEN LOCATED FROM FIELD SURVEY INFORMATION AND EXISTING DRAWINGS AND IS NOT CERTIFIED TO ACCURACY OR COMPLETENESS.

UNAUTHORIZED ALTERATION OR ADDITION TO A SURVEY MAP BEARING A LICENSED LAND SURVEYOR'S SEAL IS A VIOLATION OF SECTION 7209, SUB-DIVISION 2 OF THE NEW YORK STATE EDUCATION LAW.

CONTRACTORS' LINE & GRADE SOUTH L.L.C.
9 North Goodwin Avenue, Suite 3 #
Elmsford, New York 10523
Phone: (914) 347-3141 Fax: (914) 347-3120

BROWNFIELDS CLEANUP AREA "A"
PREPARED FOR
CONCORD ASSOCIATES, LLP
PROPERTY SITUATE IN THE
TOWN OF THOMPSON
COUNTY OF SULLIVAN
STATE OF NEW YORK
SCALE: 1" = 150'

Date: APRIL 23, 2008

CAD File: /LAND4/01-189_CAPPELLI CONCORD/DWG/DEC BROWNFIELDS-4-23-08.DWG

PROJECT NO.	7180	PROJECT	Concord	GEOPROBE NO.	OU-1A-1
LOCATION	SEE FIGURE 1	APPROX. ELEV.	1480.67±	INSPECTED BY	JZ/RF
WATER OBSERVATION	Not Encountered			DATE EXCAVATED	8/18/2008

DEPTH FT.	DESCRIPTION / SOIL CLASSIFICATION	RECOVERY / P.I.D.(ppm)
28		
29		
	End of Geo-Probe at 29 Feet	
30	REFUSAL ON ROCK AT 29 FEET	
31		
32		
33		
34		
35		
36		
37		
38		
39		
40		
41		
42		

Time: 3:20p.m. - 4:45p.m.

SESI CONSULTING ENGINEERS, PC

Fig.

PROJECT NO.	7180	PROJECT	Concord	GEOPROBE NO.	OU-1A-2
LOCATION	SEE FIGURE 1	APPROX. ELEV.	1478.94±	INSPECTED BY	JZ/CDM/RF
WATER OBSERVATION	Not Encountered			DATE EXCAVATED	8/19/2008

DEPTH FT.	DESCRIPTION / SOIL CLASSIFICATION	RECOVERY / P.I.D.(ppm)
14		
15	15-19.8' : Red-brown coarse to fine SAND, some medium to fine Gravel, little Silt w/ Weathered Sandstone from 17.4-17.6', 18.08-18.3'	R=58" P.I.D. = 0.0 (15-20')
16		
17		
18		
19		
20	20-23.98': Same w/ Weathered Sandstone from 22.2-22.3', 23.2-23.3' and Weathered Siltstone from 23.5-23.7' Sample : OU-1A-2B (22.4-23.2') 9:25am	R=58" P.I.D. = 0.0 (20-24')
21		
22		
23		
24	End of Geo-Probe at 24 Feet REFUSAL ON ROCK AT 24 FEET	
25		
26		
27		
28		

Time: 8:30am - 9:25am

SESI CONSULTING ENGINEERS, PC

Fig.

PROJECT NO.	7180	PROJECT	Concord	GEOPROBE NO.	OU-1A-3
LOCATION	SEE FIGURE 1	APPROX. ELEV.	1483.98±	INSPECTED BY	JZ/CDM/RF
WATER OBSERVATION	Not Encountered			DATE EXCAVATED	8/19/2008

DEPTH FT.	DESCRIPTION / SOIL CLASSIFICATION	RECOVERY / P.I.D.(ppm)
14		
15	15-20': Red-brown coarse to fine SAND, some medium to fine Gravel little Silt w/ Weathered Sandstone from 15-15.25'	R=58" P.I.D. = 0.0 (15-20')
16		
17		
18		
19		
20	20.0-20.7': Red-brown medium to fine SAND, some Silt, little Gravel 20.7-21.2':Weathered Sandstone 21.2-22.5':Brown coarse to fine SAND and coarse to fine Gravel, little Silt Sample : OU-1A-3B (22-22.5') 11:15am	R=34" P.I.D. = 0.0 (20-22')
21		
22		
23	End of Geo-Probe at 22.5 Feet REFUSAL ON ROCK AT 22 FEET 6 INCHES	
24		
25		
26		
27		
28		

Time: 9:50am - 11:30am

SESI CONSULTING ENGINEERS, PC

Fig.

PROJECT NO.	7180	PROJECT	Concord	GEOPROBE NO.	OU-1A-5
LOCATION	SEE FIGURE 1	APPROX. ELEV.	1492.92±	INSPECTED BY	JZ/RF
WATER OBSERVATION	Not Encountered			DATE EXCAVATED	8/19/2008

DEPTH FT.	DESCRIPTION / SOIL CLASSIFICATION	RECOVERY / P.I.D.(ppm)
0	0-1.17': Red-brown coarse to fine SAND, little Silt, little Gravel	R=19"
	1.17-1.58': Weathered Sandstone	P.I.D. = 0.0 (0-1.58')
1	Sample: OU-1A-5A (5"-1.17') 12:10	
2	End of Geo-Probe at 19 Inches	
	REFUSAL ON ROCK AT 19 INCHES	
3		
4		
5		
6		
7		
8		
9		
10		
11		
12		
13		
14		

Time: 11:55 am -12:15pm

SESI CONSULTING ENGINEERS, PC

PROJECT NO.	7180	PROJECT	Concord	GEOPROBE NO.	OU-1A-6
LOCATION	SEE FIGURE 1	APPROX. ELEV.	1507.93±	INSPECTED BY	JZ/RF
WATER OBSERVATION	Not Encountered			DATE EXCAVATED	8/19/2008

DEPTH FT.	DESCRIPTION / SOIL CLASSIFICATION	RECOVERY / P.I.D.(ppm)
0 – 5	0-1.5': Fill: Brown medium to fine SAND, some Silt, little Gravel w/ Wood Debris from 4-9" 1.5-.3.3': Red-brown medium to fine SAND, some medium to fine Gravel, little Silt w/ Weathered Sandstone from 2.5-3.3' Sample : OU-1A-6A (0-1.25') 13:15	R=40" P.I.D. = 0.0 (0-5')
5 – 8	5-5.3': Same 5.3-5.83': Weathered Sandstone 5.83-7.8': Red-brown medium to fine SAND, little Silt, little Gravel w/ Weathered Sandstone from 6.75-7.08', 7.3-7.8' Sample : OU-1A-6B (7.08-7.8') 13:20	R=44" P.I.D. = 0.0 (5-7.8')
8 – 14	End of Geo-Probe at 7 Feet 10 Inches REFUSAL ON ROCK AT 7 FEET 10 INCHES	

Time: 12:25p.m.-1:25p.m.

SESI CONSULTING ENGINEERS, PC

Fig.

PROJECT NO.	7180	PROJECT	Concord	GEOPROBE NO.	OU-1A-8
LOCATION	SEE FIGURE 1	APPROX. ELEV.	1499.0±	INSPECTED BY	JZ/RF
WATER OBSERVATION	Not Encountered			DATE EXCAVATED	8/19/2008

DEPTH FT.	DESCRIPTION / SOIL CLASSIFICATION	RECOVERY / P.I.D.(ppm)
0	0-3": Fill: Concrete Debris	R=38"
	3"-3.1': Red-brown medium to fine SAND, some medium to fine Gravel, little Silt w/ Weathered Sandstone from 1-1.3', 2.6-2.8'	P.I.D. = 0.0 (0-3.1')
1		
2	Sample: OU-1A-8A (3"-1') 13:30	
	Sample: OU-1A-8B (2.3-3.2') 13:33	
3		
4	End of Geo-Probe at 3 Feet 9 Inches	
	REFUSAL ON ROCK AT 3 FEET 9 INCHES	
5		
6		
7		
8		
9		
10		
11		
12		
13		
14		

Time: 1:25p.m.-1:35p.m.

SESI CONSULTING ENGINEERS, PC

Fig.

PROJECT NO.	7180	PROJECT	Concord	GEOPROBE NO.	OU-1A-9
LOCATION	SEE FIGURE 1	APPROX. ELEV.	1498.31±	INSPECTED BY	JZ/RF
WATER OBSERVATION	Not Encountered			DATE EXCAVATED	8/19/2008

DEPTH FT.	DESCRIPTION / SOIL CLASSIFICATION	RECOVERY / P.I.D.(ppm)
0	0-1': Fill: Misc. Debris (Foam insulation, Concrete) w/ coarse to fine Gravel	R=18"
	1-1.5': Weathered Sandstone (petroleum odor in tip)	P.I.D. = 0.0 (0-1.5')
1	Sample: OU-1A-9A (0-9") 14:10	
2	End of Geo-Probe at 1 Foot 6 Inches	
	REFUSAL ON ROCK AT 1 FOOT 6 INCHES	
3		
4		
5		
6		
7		
8		
9		
10		
11		
12		
13		
14		

Time: 1:45p.m.-2:15p.m.

SESI CONSULTING ENGINEERS, PC

Fig.

PROJECT NO.	7180	PROJECT	Concord	GEOPROBE NO.	OU-1A-10
LOCATION	SEE FIGURE 1	APPROX. ELEV.	1498.62±	INSPECTED BY	RF/CDM
WATER OBSERVATION	Not Encountered			DATE EXCAVATED	8/19/2008

DEPTH FT.	DESCRIPTION / SOIL CLASSIFICATION	RECOVERY / P.I.D.(ppm)
14		
15	End of Geo-Probe at 14 Feet 9 Inches REFUSAL ON ROCK AT 14 FEET 9 INCHES	
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		
26		
27		
28		

Time: 2:30p.m.-3:25p.m.

SESI CONSULTING ENGINEERS, PC

Fig.

PROJECT NO.	7180	PROJECT	Concord	GEOPROBE NO.	OU-1A-11
LOCATION	SEE FIGURE 1	APPROX. ELEV.	1497.51±	INSPECTED BY	RF/CDM
WATER OBSERVATION	Not Encountered			DATE EXCAVATED	8/19/2008

DEPTH FT.	DESCRIPTION / SOIL CLASSIFICATION	RECOVERY / P.I.D.(ppm)
0	0-1': Fill: Concrete and Asphalt Debris w/ Weathered Sandstone	R=25"
	1-2.1': Black-brown coarse to fine SAND, little Silt, little Gravel, oil present	P.I.D. = 0.0 (0-5')
1		
2	Sample: OU-1A-11A (1.3-2.1') 17:20	
3		
4		
5		
	5-5.6': Same	R=45"
6	5.6-7.5': Light-brown/Brown medium to fine SAND, little Silt, little Gravel	P.I.D. = 0.0 (5-10')
	7.5-8.75': Red-brown coarse to fine SAND, little Silt, little Gravel w/	
7	Weathered Sandstone from 7.1-7.3' and Weathered Siltstone from 8.4-8.75'	
8		
9		
10		
	10-11.7': Same w/ Weathered Sandstone from 11-11.4'	R=24"
11	11.7-12': Red-brown SILT, little medium to fine Sand, trace Gravel	P.I.D. = 0.0 (10-12')
12	Sample: OU-1A-11B (11.7-12') 17:25	
13	End of Geo-Probe at 12 Feet 9 Inches	
	REFUSAL ON ROCK AT 12 FEET 9 INCHES	
14		

Time: 4:45p.m.-5:25p.m.

SESI CONSULTING ENGINEERS, PC

Fig.

PROJECT NO.	7180	PROJECT	Concord	GEOPROBE NO.	OU-1A-12
LOCATION	SEE FIGURE 1	APPROX. ELEV.	1513.68±	INSPECTED BY	JZ/RF
WATER OBSERVATION	Not Encountered			DATE EXCAVATED	8/18/2008

DEPTH FT.	DESCRIPTION / SOIL CLASSIFICATION	RECOVERY / P.I.D.(ppm)
14		
15		
	15-15.5': Same	R=12"
16	15.5-16': Weathered Sandstone	
17	End of Geo-Probe at 6 Feet	
	REFUSAL ON ROCK AT 16 FEET	
18		
19		
20		
21		
22		
23		
24		
25		
26		
27		
28		

Time: 3:20p.m. - 4:45p.m.

SESI CONSULTING ENGINEERS, PC

Fig. #

PROJECT NO.	7180	PROJECT	Concord	GEOPROBE NO.	OU-1A-13
LOCATION	SEE FIGURE 1	APPROX. ELEV.	1512.08±	INSPECTED BY	JZ/CDM
WATER OBSERVATION	Not Encountered			DATE EXCAVATED	8/20/2008

DEPTH FT.	DESCRIPTION / SOIL CLASSIFICATION	RECOVERY / P.I.D.(ppm)
14		
15	End of Geo-Probe at 14 Feet REFUSAL ON ROCK AT 14 FEET	
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		
26		
27		
28		

Time: 1:00p.m.-1:40p.m.

SESI CONSULTING ENGINEERS, PC

Fig.

PROJECT NO.	7180	PROJECT	Concord	GEOPROBE NO.	OU-1A-14
LOCATION	SEE FIGURE 1	APPROX. ELEV.	1510.42±	INSPECTED BY	RF/CDM
WATER OBSERVATION	Not Encountered			DATE EXCAVATED	8/19/2008

DEPTH FT.	DESCRIPTION / SOIL CLASSIFICATION	RECOVERY / P.I.D.(ppm)
14		
15	15-15.5': Same 15.5-15.65': Weathered Sandstone 15.65-18.0': Red-brown medium to fine SAND, some Silt, little Gravel w/ Weathered Sandstone from 16.6-16.9', 17.1-17.4' Sample: OU-1A-14B (17.3-18.0') 18:20	R=39" P.I.D. = 0.0 (15-18')
16		
17		
18	End of Geo-Probe at 18 Feet REFUSAL ON ROCK AT 18 FEET	
19		
20		
21		
22		
23		
24		
25		
26		
27		
28		

Time: 5:30p.m.-6:30p.m.

SESI CONSULTING ENGINEERS, PC

Fig.

PROJECT NO.	7180	PROJECT	Concord	GEOPROBE NO.	OU-1A-15
LOCATION	SEE FIGURE 1	APPROX. ELEV.	1512.0±	INSPECTED BY	JZ/RF/CDM
WATER OBSERVATION	Not Encountered			DATE EXCAVATED	8/20/2008

DEPTH FT.	DESCRIPTION / SOIL CLASSIFICATION	RECOVERY / P.I.D.(ppm)
14		
15		
	15-18.1': Red-brown coarse to fine SAND, some medium to fine Gravel, little Silt	R = 57"/ P.I.D = 17.1(15.25')
16	w/weathered Sandstone @ 16.6-17.5'	P.I.D = 28.5(15.7')
	Free product stain @ 15.8-16'	P.I.D = 43.3(16')
17	18.1-18.9': Gray-brown coarse to fine SAND, little Gravel, trace Silt, Stained	P.I.D = 10.1(16.4')
	18.9-19.75': Gray coarse to fine SAND, A-D medium Gravel, little Silt, Slight stain	P.I.D = 16.4(17')
18		P.I.D = 52.2(17.7')
		P.I.D = 41.1(18.4')
19		P.I.D = 42.2(19.4')
		P.I.D = 5.5(19.75')
20		
	20-21.3': Red-brown-gray medium to fine SAND some medium to fine Gravel,	R = 48"
21	little Silt (mottled)(free product)(21.3-21.9weathered)	P.I.D = 86.2(20.5)
	21.9-23.25': Red-brown coarse to fine SAND, some medium to fine Gravel, little Silt	P.I.D = 150(21')
22	w/weathered sandstone	P.I.D = 73.4(21.5')
	OU-1A-15D (20.5-21.5') 12:45	P.I.D = 88.0(22')
23	23.25-24': Gray SILT, sime medium to fine Siltstone, little medium to fine Sand	P.I.D = 55.0(23')
		P.I.D = 52.8(24')
24		
25		
	25-25.5': Gray coarse to fine SAND, some medium to fine Gravel, little Silt	R = 20"
26	25.5-26.5': Gray fine grained Sandstone	P.I.D = 36.2 (25.1')
		P.I.D = 1.6 (26')
27	OU-1A-15E (26.1-26.57') 13:10	P.I.D = 0.0 (26.5')
	End of Geo-probe at 26 Feet 6 Inches	
28	REFUSAL AT 26 FEET 6 INCHES	

Time: 0900-13:10

SESI CONSULTING ENGINEERS, PC

Fig.

PROJECT NO.	7180	PROJECT	Concord	GEOPROBE NO.	OU-1A-18
LOCATION	SEE FIGURE 1	APPROX. ELEV.	1498.62±	INSPECTED BY	RF/CDM
WATER OBSERVATION	Not Encountered			DATE EXCAVATED	8/19/2008

DEPTH FT.	DESCRIPTION / SOIL CLASSIFICATION	RECOVERY / P.I.D.(ppm)
0	0-6": Concrete Debris	R=32"
	6"-2.7': Brown coarse to fine SAND, little Gravel, little Silt	P.I.D. = 0.0 (0-2.7')
1		
	Sample: OU-1A-18A (1-1.8') 15:45	
2		
3	End of Geo-Probe at 2 Feet 8 Inches	
	REFUSAL ON ROCK AT 2 FEET 8 INCHES	
4		
5		
6		
7		
8		
9		
10		
11		
12		
13		
14		

Time: 3:35p.m.-3:50p.m.

SESI CONSULTING ENGINEERS, PC

Fig.

SESI CONSULTING ENGINEERS

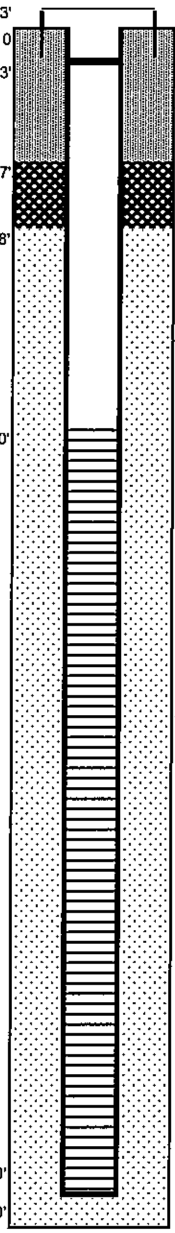
PROJECT NAME:	Concord	MONITORING WELL NO.	MW-OU-1A-4
PROJECT LOCATION:	Monticello, NY	JOB NO.	N-7180
		GROUND ELEVATION:	1487.96

BORING BY: GBI	DATE STARTED	8/21/08	DEVELOPMENT PERIOD		INSIDE CASING DIAMETER (in)	
INSPECTOR: RF	DATE COMPLETED	8/21/08	DEVELOPMENT METHOD		BOREHOLE DIAMETER (in)	7-5/8"
NJ DEP PERMIT NO.:	DATE DEVELOPED		DEVELOPMENT RATE	# gpm	INITIAL WATER LEVEL (ft):	

WELL CONSTRUCTION

Depth (feet below grade)

Top of Casing	+3'
Ground Surface	0
Top of Riser	+3'
Top of Seal	-17'
Top of Sand Pack	-18'
Top of Screen	-20'
Bottom of Screen	-40'
Bottom of Boring	-40'



Casing Type: PVC

Well Cap: Steel Cap

Well Key:

Riser Pipe: 23'

Grout Type:

Sand/Gravel Pack Size: #2 Sand

Screen Size: .02

Remarks

DEPTH (ft)	Sample	Blows on Spoon 0/6	6/12	12/18	18/24	REC (in)	SOIL DESCRIPTION AND STRATIFICATION	P.I.D.
0								
5								
10								
15								
20								
25								
30								
35								
							REFUSAL AT 35 FEET	
							CORED 5 FEET INTO ROCK	
40							MONITOR WELL COMPLETE AT 40 FEET	

Approximate Change in Strata: ___________ Inferred Change in Strata: - - - - - - - - - - - -

The subsurface information shown hereon was obtained for the design and estimating purposes for our client. It is made available to authorized users only that they may have access to the same information available to our client. It is presented in good faith, but it is not intended as a substitute for investigations, interpretations or judgment of such authorized users. Information on the logs should not be relied upon without the geotechnical engineers recommendations contained in the report from which these logs were extracted. Soil descriptions represent a field identification after D. M. Burmister unless otherwise noted.

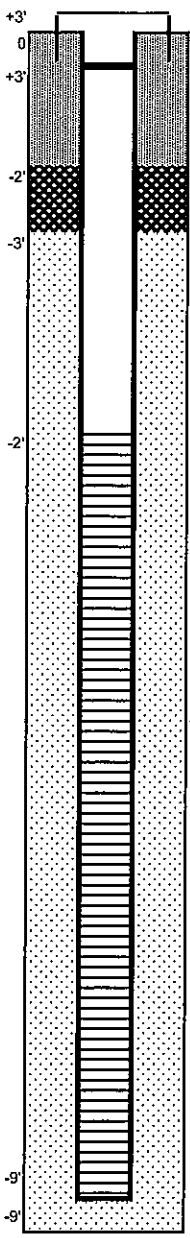
FIGURE #

SESI CONSULTING ENGINEERS

PROJECT NAME:	Concord			MONITORING WELL NO.	MW-OU-1A-7
PROJECT LOCATION:	Monticello, NY			JOB NO.	N-7180
				GROUND ELEVATION:	1498.73
BORING BY: GBI	DATE STARTED	8/15/08	DEVELOPMENT PERIOD		INSIDE CASING DIAMETER (in)
INSPECTOR: RF	DATE COMPLETED	8/15/08	DEVELOPMENT METHOD		BOREHOLE DIAMETER (in) 7-5/8"
NJ DEP PERMIT NO.:	DATE DEVELOPED		DEVELOPMENT RATE	# gpm	INITIAL WATER LEVEL (ft):

WELL CONSTRUCTION	DEPTH (ft)	Sample	Blows on Spoon 0/6	6/12	12/18	18/24	REC (in)	SOIL DESCRIPTION AND STRATIFICATION	P.I.D.
	0								
	5							REFUSAL AT 4 FEET	
	10							CORED 5 FEET INTO ROCK 12-18 Inches into core encountered less than 1 inch thick film of Free-Phase Product in seam of Fractured Rock MONITOR WELL COMPLETE AT 9 FEET	
	15								
	20								
	25								
	30								
	35								
	40								

Depth (feet below grade)



Top of Casing	+3'	
Ground Surface	0	Casing Type: PVC
Top of Riser	+3'	
		Well Cap: Steel Cap
Top of Seal	-2'	
Top of Sand Pack	-3'	Well Key:
		Riser Pipe: 5'
Top of Screen	-2'	Grout Type:
		Sand/Gravel Pack Size: #2 Sand
		Screen Size: .02
Bottom of Screen	-9'	
Bottom of Boring	-9'	

Remarks

Approximate Change in Strata: ____________ Inferred Change in Strata: - - - - - - - - - - - -

The subsurface information shown hereon was obtained for the design and estimating purposes for our client. It is made available to authorized users only that they may have access to the same information available to our client. It is presented in good faith, but it is not intended as a substitute for investigations, interpretations or judgment of such authorized users. Information on the logs should not be relied upon without the geotechnical engineers recommendations contained in the report from which these logs were extracted. Soil descriptions represent a field identification after D. M. Burmister unless otherwise noted.

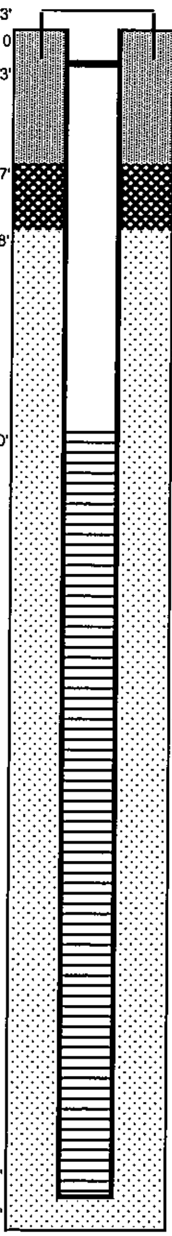
SESI CONSULTING ENGINEERS

PROJECT NAME:	Concord			MONITORING WELL NO.	**MW-OU-1A-17**
PROJECT LOCATION:	Monticello, NY			JOB NO.	N-7180
				GROUND ELEVATION:	1512.78
BORING BY: GBI	DATE STARTED	8/21/08	DEVELOPMENT PERIOD	INSIDE CASING DIAMETER (in)	
INSPECTOR: RF	DATE COMPLETED	8/21/08	DEVELOPMENT METHOD	BOREHOLE DIAMETER (in)	7-5/8"
NJ DEP PERMIT NO.:	DATE DEVELOPED		DEVELOPMENT RATE # gpm	INITIAL WATER LEVEL (ft):	

WELL CONSTRUCTION	DEPTH (ft)	Sample	Blows on Spoon 0/6	6/12	12/18	18/24	REC (in)	SOIL DESCRIPTION AND STRATIFICATION	P.I.D.
	0								
	5								
	10								
	15								
								REFUSAL AT 15 FEET	
	20								
								CORED 5 FEET INTO ROCK	
								MONITOR WELL COMPLETE AT 20 FEET	
	25								
	30								
	35								
	40								

Depth (feet below grade)

Top of Casing	+3'	
Ground Surface	0	Casing Type: PVC
Top of Riser	+3'	
		Well Cap: Steel Cap
Top of Seal	-7'	
Top of Sand Pack	-8'	Well Key:
		Riser Pipe: 13'
Top of Screen	-10'	Grout Type:
		Sand/Gravel Pack Size: #2 Sand
		Screen Size: .02
Bottom of Screen	-20'	
Bottom of Boring	-20'	



Remarks

Approximate Change in Strata: ___________ Inferred Change in Strata: - - - - - - - - - - - - -

The subsurface information shown hereon was obtained for the design and estimating purposes for our client. It is made available to authorized users only that they may have access to the same information available to our client. It is presented in good faith, but it is not intended as a substitute for investigations, interpretations or judgment of such authorized users. Information on the logs should not be relied upon without the geotechnical engineers recommendations contained in the report from which these logs were extracted. Soil descriptions represent a field identification after D. M. Burmister unless otherwise noted.

FIGURE #

SESI CONSULTING ENGINEERS

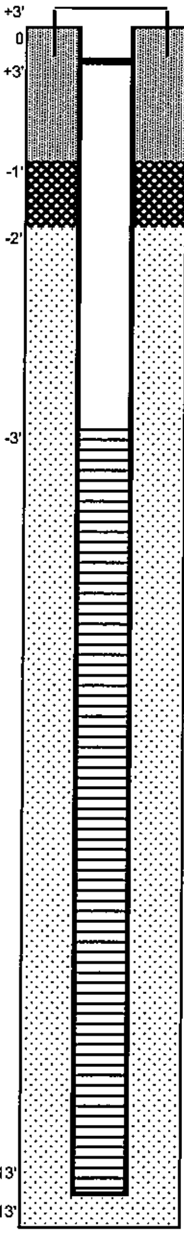
PROJECT NAME:	Concord	MONITORING WELL NO.	MW-OU-1A-19
PROJECT LOCATION:	Monticello, NY	JOB NO.	N-7180
		GROUND ELEVATION:	1498.59

BORING BY: GBI	DATE STARTED	8/21/08	DEVELOPMENT PERIOD		INSIDE CASING DIAMETER (in)	
INSPECTOR: RF	DATE COMPLETED	8/21/08	DEVELOPMENT METHOD		BOREHOLE DIAMETER (in)	7-5/8"
NJ DEP PERMIT NO.:	DATE DEVELOPED		DEVELOPMENT RATE	# gpm	INITIAL WATER LEVEL (ft):	

WELL CONSTRUCTION

Depth (feet below grade)

Top of Casing	+3'	Casing Type: PVC
Ground Surface	0	
Top of Riser	+3'	Well Cap: Steel Cap
Top of Seal	-1'	
Top of Sand Pack	-2'	Well Key:
		Riser Pipe: 6'
Top of Screen	-3'	Grout Type:
		Sand/Gravel Pack Size: #2 Sand
		Screen Size: .02
Bottom of Screen	-13'	
Bottom of Boring	-13'	



Remarks

DEPTH (ft)	Sample	Blows on Spoon 0/6	6/12	12/18	18/24	REC (in)	SOIL DESCRIPTION AND STRATIFICATION	P.I.D.
0								
5								
10							REFUSAL AT 8 FEET	
							CORED 5 FEET INTO ROCK	
15							MONITOR WELL COMPLETE AT 13 FEET	
20								
25								
30								
35								
40								

Approximate Change in Strata: ___________ Inferred Change in Strata: - - - - - - - - - - - -

The subsurface information shown hereon was obtained for the design and estimating purposes for our client. It is made available to authorized users only that they may have access to the same information available to our client. It is presented in good faith, but it is not intended as a substitute for investigations, interpretations or judgment of such authorized users. Information on the logs should not be relied upon without the geotechnical engineers recommendations contained in the report from which these logs were extracted. Soil descriptions represent a field identification after D. M. Burmister unless otherwise noted.

FIGURE #

ATLANTIC ENVIRONMENTAL
Since 1978

Qualitative Human Health Exposure Assessment

At

Concord Hotel & Resort Complex Project

Prepared For:

SESI Consulting Engineers
12A Maple Avenue
Pine Brook, NJ 07058

Prepared By:

Dr. Henry P. Shotwell, Ph.D., CIH
Atlantic Environmental, Inc.
2 E. Blackwell Street
Dover, NJ 07801

AEI Project # 2531-7658

ATLANTIC
ENVIRONMENTAL
Since 1978

Table of Contents

ATLANTIC ENVIRONMENTAL
Since 1978

SESI Consulting Engineers
(Concord Hotel & Resort, Thompson, NY)
12A Maple Avenue
Pine Brook, NJ 07058

Qualitative Human Health Exposure Assessment
September 2008
AEI Project # 2531-7658

1.0 EXECUTIVE SUMMARY

A Qualitative Human Health Exposure Assessment was carried out by Dr. Henry P. Shotwell, Ph.D., CIH of Atlantic Environmental, Inc., Dover, NJ. The assessment centered on the Concord Hotel and Resort Complex Project, which is a portion of a 1,700 acre property located in the hamlet of Kiamesha Lake, Town of Thompson, Sullivan County, NY. The site is slated for redevelopment of a hotel-resort complex, and is further identified as the approximately 33-acre OU-1A and Brownfield Expansion Area.

A number of soil and groundwater samples contained contaminant that exceeded either the concentration below which the lifetime risk of cancer is negligible, or the threshold level below which non-cancer adverse health effects are unlikely. However, considering that no one will be exposed to these contaminants over a standard lifetime of 70 years; that all soils in the project area will be remediated to Track 4 criteria and then covered by buildings or pavement; and that potable water will be piped in from remote surface sources instead of groundwater, the likelihood of adverse human health effects is remote.

2.0 INTRODUCTION

At the request of SESI Consulting Engineers of Pine Brook, NJ, Atlantic Environmental, Inc. (AEI) prepared a Qualitative Human Health Exposure Assessment for the Concord Hotel and Resort Complex project, Brownfield Expansion Area and OU-1A.

During the site characterization phase, soil and groundwater samples were collected, analyzed and compared to established New York State Department of Environmental Conservation (NYSDEC) standards (soil and water TSGM, NY-SCC and NY Water TOGS). Samples in which these criteria levels were exceeded were identified and abstracted for further analysis. A list of exceedances for carcinogens and non-carcinogenic compounds was prepared for comparison with the USEPA's Risk Based Concentration tables for using in determining Preliminary Remediation Goals.

For carcinogens, the criteria are based on an increased risk of cancer resulting from specified routes of exposure (primarily ingestion and inhalation) and lengths of time that exceed one chance in a million. If the calculated risk is less than the 1-in-a-million (10^{-6}) level, the risk is deemed to be "very low." Between the one-in-a-million and one-in-ten thousand levels (10^{-6} to 10^{-4}) the increased risk is deemed "low." An increased risk between one-in-ten thousand and one-in-ten (10^{-4} to 10^{-1}) is considered "high," while risk estimates greater than one-in-ten ($>10^{-1}$) is "very high." According to the NYS Qualitative Risk Assessment process for carcinogens, "...an increased lifetime cancer risk of one-in-a-million or less, is generally considered an insignificant increase in cancer risk."

For non-carcinogenic substances, the analytical data are compared with oral and/or inhalation Reference Doses (R_fD_o or R_fDi). Non-carcinogens are considered to have threshold levels, below which adverse effects will not occur. Compounds assessed according to Reference Doses are considered to have "minimal" risk of adverse effect if they are available at or below the Reference Dose. Up to 5 times more than the Reference Dost is considered to carry a "low" risk of adverse effect. Between 5 and 10 times the Reference Dost is considered "moderate" and the risk is considered "high" if the analysis shows more than 10 times the Reference Dose.

2.1 Population and Community Description

The Concord Hotel and Resort Complex project, Brownfield Expansion Area and OU-1A is located at the intersection of Kiamesha Lake and Concord Roads in the Town of Thompson, Sullivan County, NY, in the hamlet of Kiamesha Lake. The population of the Town of Thompson was 14,189 as of the 2000 census. In 2006, census data showed a population of 281 in the hamlet of Kiamesha Lake.

The Concord Hotel and Resort began in the mid-1930's and its hey-day was the 1950's, 1960's and 1970's. The 1700-acre property had a cluster of hotel buildings near the intersection of Concord and Lake Kiamesha Roads and a large golf course to the south of the hotel complex. Few residential houses are present in the largely rural hamlet in which the complex was situated.

2.2 Site Activities and Site Use

Redevelopment plans call for the construction of a new hotel-resort complex on the site of the former complex.

There will be few, if any, private residences nearby. Potential human exposures would involve adult humans employed for a nominal 40-hour work week and resort visitors whose stay is not expected to average more than several days per year.

2.3 Assessment Strategy

Analytical results from soil and groundwater samples were reviewed. All data which exceeded any of the NYS-DEC criteria levels were extracted, and a new database prepared. All compounds in this new list were then classified as carcinogenic or non-carcinogenic according to the USEPA Region III Risk-Based Concentration Table, from Risk Assessment Guidelines for Superfund, Part B (RAGS-B).

These guidelines present equations to assess the lifetime cancer risk of 1 in a million to people in residences, engaged in construction, commercial or industrial activities, and a set of default parameters which gives a "worst-case" risk-based concentration which, if a person was exposed to over a lifetime, would result in an excess cancer risk of 1 in a million or less.

Similarly, the default values were used to compute a Hazard Index (HI) for each non-carcinogen that exceeded a NYS-DEC soil or groundwater clean-up goal criterion. A Hazard Index of one (1) means that over a lifetime of exposure to the compound in question at the corresponding concentration, no adverse health effects would be expected. A measured soil or groundwater concentration that is equal to or less than the calculated target HI (THI) would not be considered a human health hazard under lifetime exposure conditions.

From the subgroup of chemicals whose tested soil or groundwater concentrations exceed either the carcinogen one-in-a-million risk (10^{-6}) concentration or the non-carcinogen target health index (THI) concentration, an evaluation was made for each item. The rating system is:

2.3.1 Non-Carcinogens

Equal to or less than THI = minimal risk
1 to 5 times THI = low risk
5 to 10 times THI = moderate risk
More than 10 times THI = high risk

2.3.2 Carcinogens

Less than 10^{-6} level = very low risk
From 1 to 100 times above the 10^{-6} level = low risk
From 100 to 100,000 times above to 10^{-6} level = high risk
Greater than 100,000 times above to 10^{-6} level = very high risk

3.0 QUALITATIVE HEALTH RISK ASSESSMENTS

3.1 Soil-Carcinogens

The Target Risk (TR) level is the concentration in milligrams per kilogram of body weight per day to which a person may be exposed over a standard 70-year lifespan that is associated with an excess risk of developing cancer, of 1 in 1 million.

Compound	Maximum Concentration in Soil	Target Risk (TR)
Benzo (a) Anthracene	40 mg/kg	7.9 mg/kg
Benzo (a) Pyrene	39	0.79
Benzo (b) Fluoranthene	54	7.9
Benzo (k) Fluranthene	20	7.9
Chrysene	41	785.3
Dibenzo (a,h) Anthracene	6	7.9
Indeno (1,2,3,-c,d) Pyrene	19	7.9
Poly Chlorinated Biphenyls	3.53	0.29
Dieldrin	0.015	0.3625
DDD	0.073	24.17
DDE	0.11	17.06
DDT	0.34	17.06
Arsenic	85	3.87

3.2 Soil-Non-Carcinogens

Compound	Maximum Concentration in Soil	Target Hazard Index
Acetone	0.098 mg/kg	1.8×10^6 mg/kg
Xylenes	2.3	3.06
Dibenzofuran	7.0	2,040.0
Fluoranthene	110.0	81,600.0
Pyrene	110.0	61,200.0
Barium	430.0	0.01428
Beryllium	2.2	4,080
Cadmium	17.0	1,020
Chromium	92.0	6,120
Copper	2,000.0	81,600
Mercury	1.5	0.0088
Nickel	66.0	40,800
Silver	9.5	10,200
Zinc	2,200	612,000

3.3 Groundwater-Carcinogens

Compound	Maximum Concentration in Water	Target Risk (TR)
Benzene	0.016 mg/Liter	5.44×10^{-4} mg/Liter
Arsenic	0.059	1.5×10^{-6}

3.4 Groundwater-Non-Carcinogens

Compound	Maximum Concentration in Water	THI
Ethylbenzene	0.057 mg/Liter	1.59 mg/Liter
Xylenes	0.300	0.28
Toluene	0.067	2.86
Acenaphthene	0.052	2.19
Fluorene	0.066	1.46
Naphthalene	0.200	8.7×10^{-3}
Barium	2.400	1.36×10^{-3}
Beryllium	0.020	5.54×10^{-5}
Chromium	0.180	2.9×10^{-4}
Copper	0.560	1.46
Nickel	0.510	0.73

3.5 Assessment of Compounds Exceeding TRs and/or His

Benzo (a) Anthracene (soil)	Low
Benzo (a) Pyrene (soil)	Low
Benzo (b) Fluoranthene (soil)	Low
Benzo (k) Fluoranthene (soil)	Low
Indeno (1,2,3-c,d) Pyrene (soil)	Low
Poly Chlorinated Biphenyls (soil)	Low
Arsenic (soil and groundwater)	Low (soil); High (water)
Acetone (soil)	Low
Barium (soil & water)	Low (soil); High (water)
Mercury (soil)	High
Benzene (water)	Low
Naphthalene (water)	High
Beryllium (water)	High
Chromium (water)	High

3.6 Compounds Exceeding NYSDEC Criteria With No EPA RBCs

1,2,4-Trimethylbenzene

1,3,5-Trimethylbenzene

Phenanthrene

Lead

4-isopropyltoluene

isopropylbenzene

methyl-tert-butyl ether

n-methylbene

n-propylbenzene

2-methylnaphthalene

4.0 DISCUSSION AND CONCLUSIONS

The intended final use of this property as a resort hotel implies that potential human exposures will be on the order of several days to a week, at most, on average, and the risk of adverse health effects to be minimal.

In the case of the Concord Hotel and Resort project, potable water will be obtained from a surface impoundment (Lake Kiamesha) whose quality must meet NYS Drinking Water standards. The Brownfield Expansion area, from which both soil and groundwater samples were obtained, will be essentially covered over with parking lot paving and structural footprints.

Consequently, neither the contaminants in the soil, nor in the groundwater will be available for human exposure by inhalation or ingestion over the time periods used to calculate the default Threshold Health Indices (for non-cancer effects) nor the Target Risk concentrations for carcinogenic effects.

The use of EPA default criteria for assessing the lifetime risk of developing cancer or other, non-cancerous effects makes the tacit assumption that ingestion or inhalation of the chemical(s) in question will occur over 365 days per year, for 70 years. Of the 30 chemicals discovered in soil, and the 24 chemicals in groundwater which exceeded a NYS-DER criterion, 20 of the soil samples and 6 of the groundwater samples exceeded a concentration which has been identified as either a level which does not increase the risk of cancer by 1-in-a-million or as a level which is above the point, below which non-cancerous adverse health effects are not expected.

5.0 RECOMMENDATIONS

5.1 Collect and analyze soil samples from initial sampling sites that exceeded either a THI (for non-carcinogens) or a TR (for carcinogens) after site preparation activities are complete.

The soil sample results upon which this evaluation was based represent conditions which were present before the site was prepared for new construction and remediation to Track 4 criteria as given in 6NYCRR Part 375-6.8 (b).

As a consequence of these activities, we believe the initial soil concentrations will change. Those sample points that had soil contaminants above the Target Risk concentrations for carcinogenic effects, should be re-sampled after site preparation is finished.

Report Prepared By: Henry P. Shotwell

Henry P. Shotwell, Ph.D., CIH
Vice-President

Report Reviewed By: Robert E. Sheriff

Robert E. Sheriff, CIH, CSP
CEO & President

FISH & WILDLIFE IMPACT ANALYSIS (FWIA)

BROWNFIELD CLEANUP PROGRAM (Site #C353008)
OPERABLE UNIT #1A (OU1A)
Concord Hotel & Resort Property

Town of Thompson, Sullivan County, NY

September 22, 2008

PREPARED BY:

PK ENVIRONMENTAL
Planning & Engineering
PO Box 1066, 205 Main Street
Chatham, New Jersey 07928
(973) 635-4011

1.0 INTRODUCTION

In coordination with SESI Consulting Engineers, PK ENVIRONMENTAL has completed an environmental analysis of the Concord Hotel & Resort property, consistent with the New York State Department of Environmental Conservation (NYSDEC) guidelines of the Fish and Wildlife Resources Impact Analysis (FWRIA) Part 1. This analysis was conducted for the proposed Concord Hotel and Resort Brownfields Redevelopment project in the Town of Thompson, Sullivan County, NY, which is being implemented within the NY State Brownfields Cleanup Program (BCP). Specifically this environmental analysis was done for the main hotel area identified as Operable Unit #1A (OU1A) as referenced on the map titled "Analytical Results Summary Plan for OU-1A and Brownfields Site Expansion Area" dated 7/8/08, prepared by SESI Consulting Engineers, PC. PK ENVIRONMENTAL made comprehensive on-site inspections during September 2008, to inventory the site characteristics and environmental resources within ½-mile of OU1A.

OU1A requires site remediation in preparation for the major redevelopment of the former Concord Hotel & Resort, which has been identified as Brownfield Cleanup Program (BCP) Site #C353008, being completed by Concord Associates, LP. The purpose of this FWRIA Part 1 assessment is to identify actual or potential impacts to fish, wildlife resources, and critical environmental receptors, from site contaminants of ecological concern, and this report was prepared in accordance with the Fish and Wildlife Resources Impact Analysis Decision Key (Appendix 3C) within the outline of the DER-10 Technical Guidance for Site Investigation and Remediation. As such, this report provides documentation and a comprehensive characterization of the natural resources, on and within ½-mile of the study area, supporting the decision to eliminate the need for a complete FWRIA, in relation to the proposed OU1A remediation and associated redevelopment activities.

2.0 SITE DESCRIPTION OF PROPERTY AND AREA WITHIN ½-MILE

The former Concord Hotel & Resort property consists of approximately 1,755-acres adjoining Concord Road, Kiamesha Lake Road, Chalet Road, and Kiamesha Lake, however the OU1A area includes only a 2-acre portion of the overall property, located at the corner of Kiamesha Lake Road and Concord Road, that previously included the main hotel facility, as depicted on the enclosed aerial photograph (**Figure 1**). The hotel was originally constructed in the 1920's with numerous expansions throughout the years, until its closure in 1997. The OU1A area included an impervious area with hotel buildings, numerous smaller accessory buildings, and recreation areas. As depicted on the **Figure 2** USGS Vicinity Map, Monticello Quadrangle, the surrounding ½-mile study area consists of:

- (North) Kiamesha Road and residentially developed lands, and mature woodlands.
- (West) Developed/impervious lands associated with the former main hotel, including buildings, tennis courts, pool area, wooded wetlands and uplands, and Kiamesha Lake.
- (South) Developed/impervious areas including interior roads and accessory buildings associated with the former hotel, and maintained inactive golf course areas.
- (East) Concord Road, residential homes on Kiamesha Lake Road, and buildings and parking areas associated with golf course and the active golf course.

PK ENVIRONMENTAL
PO Box 1066, 205 Main Street
Chatham, New Jersey 07928
(973) 635 - 4011

FIGURE 1
SOURCE: Google Earth Aerial Photograph
(NTS)

PK ENVIRONMENTAL
PO Box 1066, 205 Main Street
Chatham, New Jersey 07928
(973) 635 - 4011

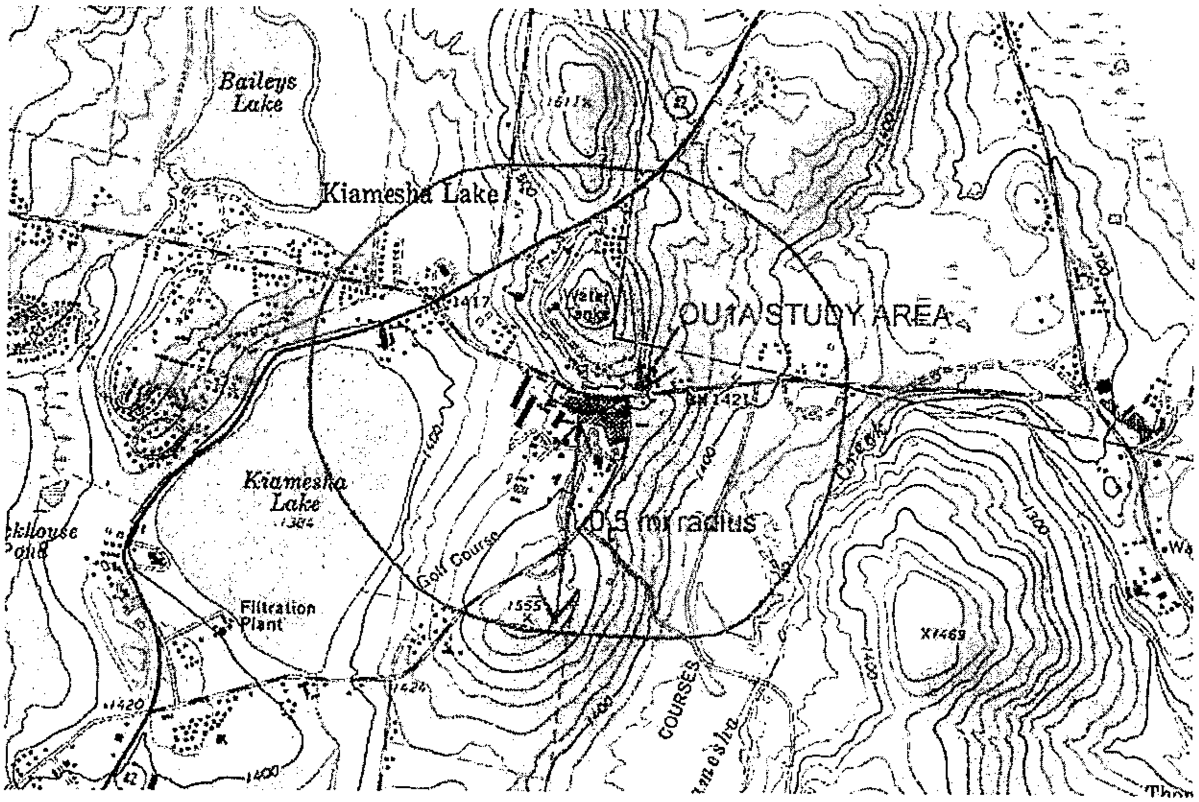


FIGURE 2
SOURCE: USGS 7.5 Minute Topographic Vicinity Map
Monticello Quadrangle
Concord Hotel (Casino) Property
(NTS)

PK ENVIRONMENTAL
PO Box 1066, 205 Main Street
Chatham, New Jersey 07928
(973) 635 - 4011

FIGURE 3 – SOILS MAP
SOURCE: USDA/NRCS Web Soil Survey
DATE: 1996
(NTS)

3.0 RESOURCE CHARACTERIZATION

3.1 Topography, Geology, and Hydrogeology

Topography and Drainage - The USGS Vicinity Map, Monticello Quadrangle, **Figure 2,** indicates that the OU1A area is located at the top of a local drainage divide, with mild to moderate grades sloping downward to the west towards Kiamesha Lake, and downward to the east towards Concord Road and Kiamesha Creek. As depicted on the detailed site topography map prepared by SESI Consulting Engineers, elevations in the OU1A study area are about 1,500-feet mean sea level (msl) near the intersection of Kiamesha Lake Road and Concord Road.

There are no watercourses or natural drainage features within OU1A, as the main hotel area consisted of extensive impervious coverage, where surface water runoff was collected and conveyed through storm drains within the resort facility, and along Concord Road. Stormwater runoff from the OU1A area dissipated as overland sheet flow through the woodlands adjacent to Kiamesha Lake, down-gradient to the west, and through the off-site woodlands towards the Kiamesha Creek, east of Concord Road.

Geology – According to the Sullivan County Soil Survey, the Town of Thompson is located in the Catskill Mountains of New York, within the Appalachian Plateau province. Bedrock at the site is known as Lower Katsberg Formation which is comprised of reddish sandstone and shale, and where bedrock is located at depths that range from at the surface to 60-inches below ground surface (bgs).

Hydrogeology – As depicted on Table 1 in the "*Site Characterization Investigation Results for Concord Hotel Site*", dated June 3, 2008, prepared by SESI Consulting Engineers, groundwater is located in the bedrock, not found in the overburden, ranging from approximately 14.2 to 23-feet bgs in the OU1A area. On-site groundwater flows in generally in a westerly direction toward Kiamesha Lake, similar to the surface water flow direction on the site.

3.2 Streams and Lakes

Significantly, there are no streams or lakes within OU1A, however Kiamesha Lake is situated about 1,900-feet from the western limits of the 2-acre study area, and Kiamesha Creek is located about 2,000-feet from the eastern limits (Concord Road) of OU1A. The subject property is situated within the Neversink River watershed in the Delaware River Drainage Basin, and the OU1A study area includes two minor drainage areas situated entirely within the Kiamesha Creek sub-watershed, and within ½-mile of Kiamesha Lake and Kiamesha Creek. The western part of OU1A drains overland, then through woodlands towards Kiamesha Lake, while the eastern OU1A study area drains overland, across Concord Road and woodland areas to the Kiamesha Creek, well downstream of the Lake.

Kiamesha Lake consists of a Lacustrine open water system that lacks persistent emergent vegetation but does include some submerged aquatic vegetation and floating-leaved aquatic vegetation. Kiamesha Creek is a Riverine open water system, consistent with a midreach stream that ranges from 10-feet to 100-feet in width, with a well defined pattern of alternating pools, riffles and run sections. The Kiamesha Creek is somewhat modified in the areas where it flows through the eastern golf course, however natural areas of the Creek are surrounded by a dense canopy of upland and Palustrine wetland forest.

Surface Water Quality – The NYSDEC assigns surface water quality classifications, standards, and purity to all surface waters, and the surface water quality of Kiamesha Lake is designated as a "Class A" surface water, because the Lake is utilized as a potable water supply. According to the NYSDEC, the best usage of Class A waters are as a source of drinking water supply, culinary, or food processing purposes, and for primary and secondary contact recreation and fishing. Class A waters shall be suitable for fish propagation and survival.

Kiamesha Creek, downstream of the Lake, is designated as a "Class C" surface waterway, where the best usage is fishing, and these waters shall be suitable for fish propagation and survival, and for primary and secondary contact recreation. Further downstream, Kiamesha Creek flows to the Sheldrake Stream and the Neversink River, where both watercourses are designated as "Class B" surface waters.

There are no permits required by the NYSDEC to disturb the bed or banks of surface waters with non-protected status, but all proposed site work and site remediation must ensure that no additional pollution will be introduced into any streams and waterbodies, and that disturbed areas are stabilized to prevent contamination into nearby surface waters. Because the water quality of Kiamesha Lake is sufficient to meet specific designated uses, restoration and protection efforts beyond conventional technology-based controls are necessary to address water quality issues for Class A surface waters.

3.3 Vegetation Communities

On-Site Vegetation (OU1A) - The 2-acre OU1A area is mostly impervious, consisting of old buildings and asphalt pavement for a myriad of roads, parking areas, and recreation areas, with small areas of overgrown lawn and landscaping. As such, the OU1A area has no rare, threatened or endangered flora or fauna, and provides only minimal on-site vegetation that is typical within developed urban areas.

Vegetation within ½-mile Radius: The ½-mile study area that surrounds OU1A, consists of developed impervious areas, forested uplands, an actively maintained golf course, Palustrine forested wetlands, Riverine vegetation communities (Kiamesha Creek), Lacustrine system (Kiamesha Lake), and residentially and commercially developed land. The following are descriptions of the vegetation communities within the ½-mile study area.

- **Forested Uplands**: Forested uplands within the ½-mile study area beyond OU1A include diverse vegetation communities that are typical of successional southern hardwoods, beech-maple mesic forest, and hemlock–northern hardwood forest, located on the steep to moderately sloping hillsides.

  The successional southern hardwoods are mixed forest communities that have established on areas that were previously cleared and disturbed by human activity, for farming, logging, etc., where the dominant overstory trees include gray birch, sassafras, red maple, Eastern red cedar, quaking aspen, white ash, black locust, and understory field species along the forest edges.

  Beech-maple mesic forest areas consist of dominant overstory species including sugar maple, red maple, American beech, black cherry, white ash, white pine, Eastern hemlock, black birch, yellow birch, red oak, and white oak, with shadbush, interrupted fern, and wood fern interspersed throughout the shrubby and herbaceous understory.

The hemlock–northern hardwood forest areas are located east of Concord Road, on the middle to lower slopes of the Kiamesha Creek riparian corridor. The dominant overstory trees include Eastern hemlock, yellow birch, and red maple, with rhododendron distinctively within the shrubby understory.

- **Palustrine Forested Wetlands** consist of red maple–hardwood swamp in the vicinity of Kiamesha Lake, and hemlock-hardwood swamp in the vicinity of Kiamesha Creek. Red maple–hardwood swamps in this area consists of poorly drained depressions and topographic draws, with surface seeps and springs, dominated by red maple, American elm, white ash, and yellow birch. The densely vegetated shrubby understory consists of spicebush, highbush blueberry, swamp azalea, and winterberry, with herbaceous species including sensitive fern, yellow loosestrife, and numerous sedges. The hemlock-hardwood swamps that are located in the Kiamesha Creek riparian valley include a dense Eastern hemlock canopy mixed with yellow birch and red maple, and a limited understory and sparse herbaceous groundcover.
- **Riverine System:** East of Concord Road, the Kiamesha Creek flows in a northeasterly direction, where it functions as a medium midreach stream, ranging from 10-feet to 100-feet in width, with a well defined pattern of alternating pools, riffles and run sections. The Kiamesha Creek is somewhat modified in the areas where it transverses the golf course, however further downstream to the north, natural non-wetland riparian areas of the Creek are surrounded by dense canopy vegetation including Eastern hemlock, sugar maple, red maple, American beech; black cherry, white ash, white pine, black birch, yellow birch, red oak and white oak. Within the Creek, typical aquatic macrophytes include waterweed (Elodea Canadensis) and linear-leaved pondweed (Pomtamogeton pectinatus)
- **Lacustrine System**: Kiamesha Lake, which is located within the western portion of the ½-mile radius study area, consists of a Lacustrine open water system that lacks persistent emergent vegetation, but does include some submerged macrophytic aquatic vegetation and floating-leaved aquatic vegetation. Kiamesha Lake is moderately clear, with moderate amounts of nutrients and plant life, and there is a water filtration plant located on the southeast side of the Lake, which pumps and treats water for potable uses and drinking water.

NY State Regulated Wetlands - As depicted on the New York State Wetlands Maps, and summarized within **Appendix A**, there are no State regulated wetlands on or within ½-mile of the OU1A study area. The subject site is located in a previously developed area, and based upon our on-site inspections and review of additional publicly available information, there are no freshwater or tidal wetlands, shellfish beds, or weed beds within the OU1A area.

As depicted on the *Existing Conditions Map*, prepared by SESI Consulting Engineers, Palustrine forested wetlands are present over 800-feet west of the OU1A study area, which were field identified and surveyed, and these forested wetlands are hydrologically connected to Kiamesha Lake. Two wetland/ stormwater ditches, which drain to the wetlands, are located in the mature upland woodlands that also adjoin Kiamesha Lake, and the beginning of these wetland ditches is located about 700-feet southwest of OU1A. In addition, there are Palustrine forested wetlands located about 600-feet east of OU1A, and 300-feet east of Concord Road, that are hydrologically connected to Kiamesha Creek. Kiamesha Creek is located over 2,000-feet east of OU1A.

3.4 Fish & Wildlife Habitat

Area OU1A is developed with buildings and impervious surfaces, which do not provide any wildlife habitat, and the immediately surrounding old main hotel areas provide no suitable habitat for small mammals, birds, reptiles, amphibians, and fish due to highly disturbed conditions and low vegetation species diversity. Undeveloped areas located within the ½-mile study area provide suitable habitat for mammals, birds, reptiles, and amphibians, and fish as they provide food, cover, bedding areas, breeding, and nesting sites for a large variety of commonly occurring wildlife. In addition, the current and potential uses of fish and wildlife resources within the study area by humans include Kiamesha Lake as potable water source, Kiamesha Lake and Kiamesha Creek as fishing locations, and woodlands for hunting. Fish and wildlife that are typically identified in the natural areas within ½-mile of OU1A, may include the following:

Threatened and Endangered Species – During our recent on-site and surrounding area investigations and document review of the NYSDEC database, there were no threatened and/or endangered species identified on or near the property **(Appendix A)**.

Significant Coastal Fish and Wildlife Habitats - Based on our recent on-site and surrounding area investigations and document review, there are no coastal areas within ½-mile of the subject site.

NY State Significant Habitats/NY State Rare Ecological Communities - There are no NY State Significant Habitats or Rare Ecological Communities within ½-mile of the subject site, based upon our on-site reconnaissance, and as summarized by the NYSDEC New York Natural Heritage Program **(Appendix A)**.

Mammals - Woodchucks, skunk, gray squirrel, chipmunks, moles, bats, mice, and rats.

Birds - Black crows, sea gulls, pigeons, mourning doves, common grackle, tufted titmouse, nuthatches, juncos, bluejays, cardinals, catbirds, downy woodpecker, black-capped chickadee, robins, warblers, blackbirds, starlings, house finch, sparrows, goldfinch, mockingbird.

Reptiles & Amphibians - Snapping turtle, eastern garter snake, American toad, and green frog.

Fish – Within the nearby Lake, fish species may include chain pickerel (Esox niger), yellow perch (Perca flavescens), brown bullhead (Ictalurus nebulosus), yellow bullhead (Ictalurus natalis), bluegill (Lepomis macrochirus), pumpkinseed (Lepomis gibbosus), golden shiner (Notemigonus crysoleucas), fathead minnow (Pimephales promelas), largemouth bass (Micropterus salmoides). Downstream of the Lake, in the Creek, fish species may include creek chub (Semotilus atromaculatus), pumpkinseed (Lepomis gibbosus), common shiner (Notropis cormutus), and trout-perch (Percopsis omiscomaycus) in pools.

4.0 ECOLOGICAL EXPOSURE PATHWAYS

4.1 Potential Resources Identified

Operable Unit #1A (OU1A) is a 2-acre area located within the densely developed northeast property corner of the former Concord Hotel and Resort, located in the Town of Thompson, Sullivan County, NY. Within ½-mile of OU1A, areas of forested uplands, forested wetlands, man-made wetland ditches, Kiamesha Lake, and Kiamesha Creek were identified as limited potential ecological receptors. The following is a summary of the exposure pathways as they relate to the potential ecological receptors.

Soil - Recent soil sampling completed by SESI Consulting Engineers documents the presence of soil contamination from semi-volatile organic compounds, PCBs, metals, and pesticides from existing underground storage tanks. The site is presently developed and mostly impervious, which prevents direct contact with the soil by wildlife. The planned redevelopment of the site will include hotspot soil excavation/disposal and capping of areas with buildings, asphalt, and soil (soil reuse) that slightly exceeds *"Unrestricted Use"*, primarily for metals, PCBs, and pesticides, as the capping soil. The capping soil will be below the *"Restricted Use-Commercial and Protection of Groundwater"* criterion, and will be covered with clean topsoil prior to planting, therefore preventing any potential direct contact with the contaminated soils in the future. The impervious surface also prevents surface water from infiltrating into the site's soils and provides an incomplete exposure pathway. No soil sampling was conducted in the down-gradient woodland areas that are located within ½-mile of OU1A.

Surface Water & Sediment - Kiamesha Lake and Kiamesha Creek receive indirect surface stormwater sheet flow runoff from the subject site, as the impervious OU1A area is located within these local sub-watersheds. Storm drains located within the previous hotel facility likely drained to outlets within the down-gradient woodlands and wetlands, and eventually as sheet flow to Kiamesha Lake and Kiamesha Creek. Significantly, all soil contamination is below grade, as related to dumping and underground storage tanks, so surface runoff would not introduce related contaminants. OU1A is presently surrounded by impervious areas, remaining buildings, tennis courts and roadways, and sediment basins are being constructed at the base of the proposed redevelopment areas to collect surface water runoff from the entire redevelopment area, including OU1A. Soil erosion control features including sediment fence and hay bales around inlets are presently in place, and these are actively monitored and maintained. All sediment runoff from the future soil disturbances related to soil remediation and redevelopment in OU1A will be intercepted by these stormwater controls, removing potential pathways for surfacewater runoff and sediments to the down-gradient ecolgical receptors.

Future redevelopment plans will cap most of OU1A with impervious surfaces, including buildings and asphalt, and smaller landscaped areas with a soil cap utilizing reused soils that slightly exceeds *Unrestricted Use*, primarily for metals, PCBs, and pesticides. Reused soils will be covered with clean topsoil prior to planting. The extensive stormwater management system for the proposed redevelopment project, including the OU1A area, includes a stormwater collection system that discharges to a biofiltration basin with underdrains that will capture all sediments and provide a high level of water quality treatment for the stormwater that eventually discharges through the down-gradient woodlands, wetlands, Kiamesha Lake, and Kiamesha Creek.

Groundwater to Surface Water - Recent groundwater sampling results indicate that groundwater contamination is negligible in OU1A, with groundwater sampling from a well located about 1,000-feet west (down-gradient of OU1A), and about 500-feet east of Kiamesha Lake, indicating NonDetect (ND) results, except for metals. No active groundwater remediation is planned, however a CEA will be proposed, and a product plume, in bedrock, down-gradient of one of the tank areas, will be delineated within the OU1A boundary.

Although most of the groundwater flow is directed toward Kiamesha Lake, recent groundwater sampling results indicate negligible groundwater contamination from OU1A, and therefore, the contaminants have not migrated to a resource along the potential pathway, thus determining an incomplete exposure pathway from OU1A.

5.0 SUMMARY & CONCLUSIONS

The Operable Unit #1A (OU1A) study area is located within a highly developed area within the former Concord Hotel and Resort located in the Town of Thompson, Sullivan County, NY. As such; the existing fish and wildlife habitat opportunity is absent within the 2-acre OU1A study area, and minimal in the immediate surrounding areas within ½-mile.

Although wooded wetlands, upland woodlands, and surface water bodies within the ½-mile study area do provide suitable habitat for commonly occurring wildlife, it is our conclusion that because OU1A is completely surrounded by impervious/disturbed areas, potential adverse effects and ecological risks to fish and wildlife resources will be unlikely from migration of constituents of potential ecologic concern. Long-term natural resource improvements should occur based upon the site remediation activities related to the brownfield redevelopment project, as all sediment runoff from the future soil disturbances related to soil remediation and redevelopment in OU1A will be intercepted by implemented stormwater controls, to remove potential surface pathways for runoff and sediments to the down-gradient ecolgical receptors.

Photo # 1: Looking SW across demolished Concord Hotel pool building, where orange fence in foreground is southern edge of OU1A.

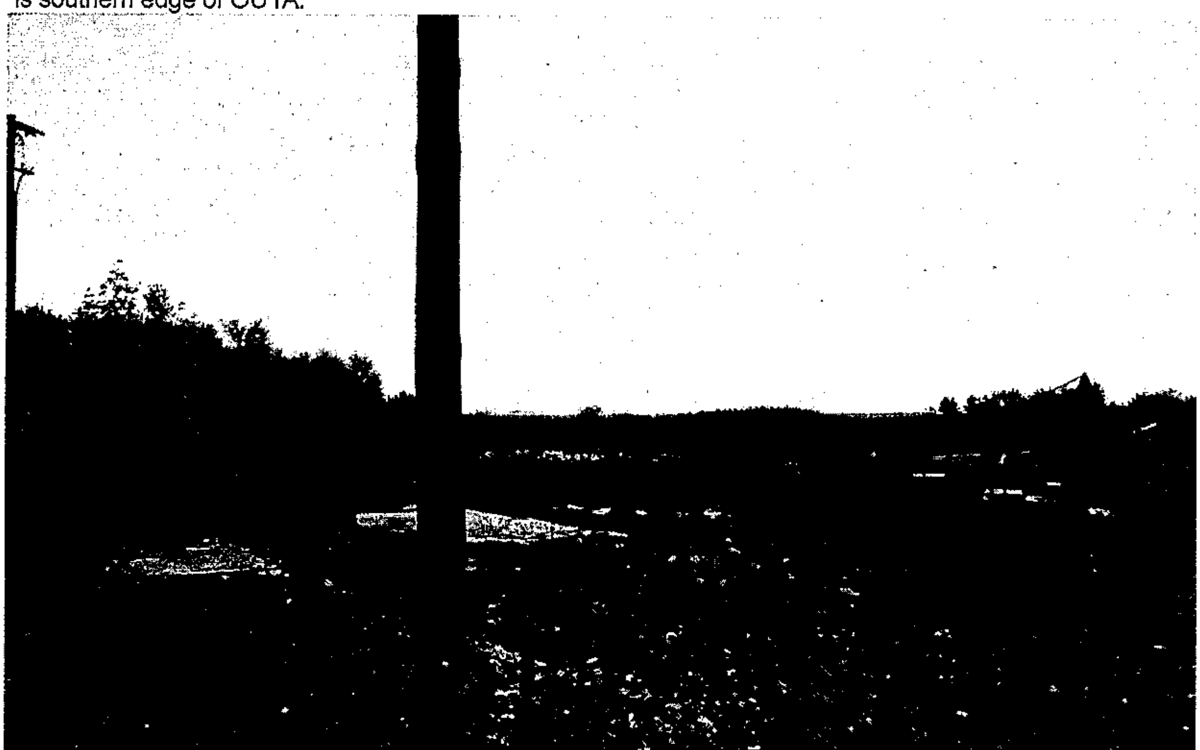


Photo # 2: Looking SE across demolished Concord Hotel building area, where orange fence in foreground is southern edge of OU1A, and Concord Road is in the far background.

Photo # 2: Looking East on Kiamesha Lake Road, at the intersection with Concord Road, with OU1A to the right, at the highest topographic elevation in OU1A.

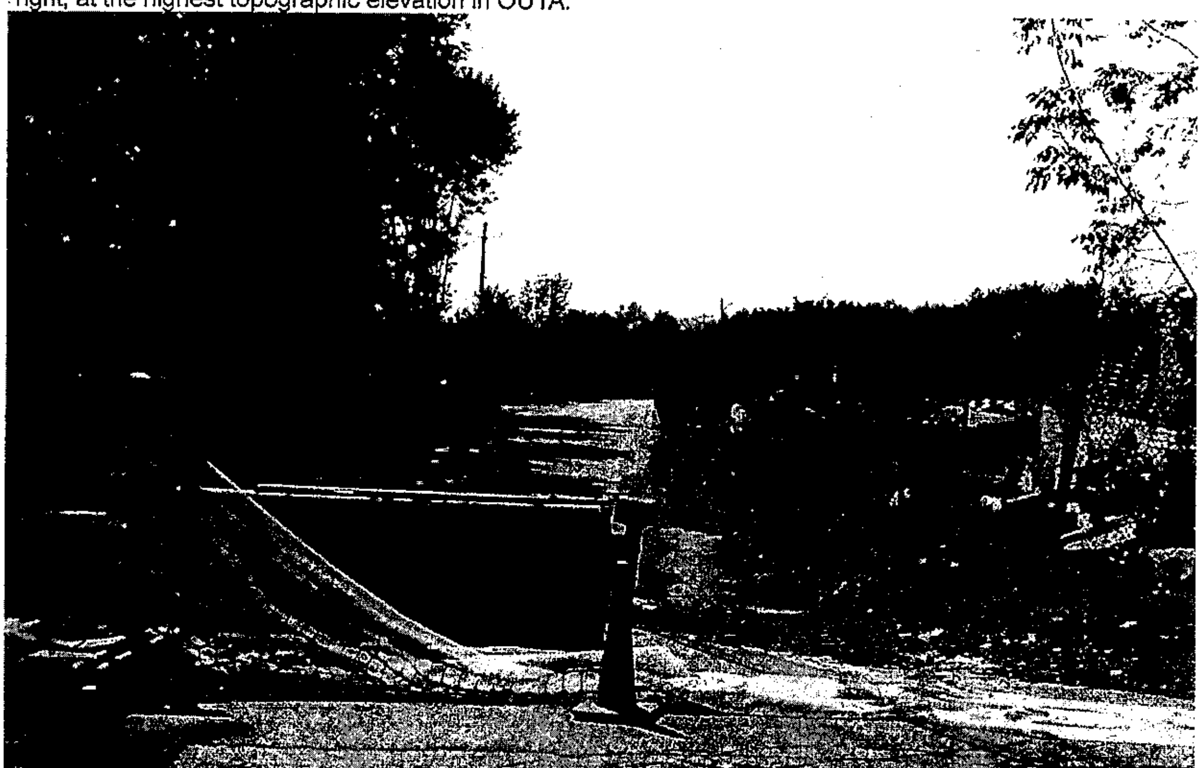


Photo # 4: Looking South down Concord Road, and the NE corner of OU1A to the right. The area to the left (east) includes two residences and an open storage area for the old Hotel.

Photo # 5: Looking SW across remnant impervious tennis court/recreation area, which is outside the OU1A area, but within ½ -mile study area, with Kiamesha Lake in the background. Orange fence is for runoff.

Photo # 6: Looking South at western edge of the redevelopment area, about 800-feet west of OU1A. Settling basin and silt fence have been constructed at woodland/wetland boundary to protect against runoff into Kiamesha Lake.

Photo # 7: Looking SW at excavated ditch which dissipates into the wooded wetlands, east of Kiamesha Lake

Photo # 8: Looking east from wooded wetlands, towards the old Concord Hotel demolition area.

Appendix A

New York State Department of Environmental Conservation
Division of Environmental Permits, Region 3
21 South Putt Corners Road, New Paltz, New York 12561-1620
Phone: (845) 256-3054 • **FAX:** (845) 255-4659
Website: www.dec.ny.gov

VIA FAX TO (973) 635-4023 + U.S. MAIL

Alexander B. Grannis
Commissioner

Date: 9-10-08

MR. PATRICK McNAMARA
PK ENVIRONMENTAL
P.O. BOX 1066
205 MAIN ST.
CHATHAM, NJ 07928

RE: KIAMESHA CREEK VICINITY SITE PER ATTACHED MAP - CH #2291

Location: T/ THOMPSON , SULLIVAN County

Dear MR. McNAMARA :

Based upon our review of your inquiry dated 9-4-08, we offer the following comments:

PROTECTION OF WATERS

☐ The following stream(s)/pond(s)/waterbody(ies) is(are) located within or near the site you indicated:

Name	Class	DEC Water Index Number	Status
	[ ]		[Protected, non-protected, navigable]
	[ ]		[Protected, non-protected, navigable]

☐ A Protection of Waters permit is required to physically disturb the bed or banks (up to 50 feet from stream) of any streams identified above as "protected." A permit is not required to disturb the bed or banks of "non-protected" streams.

☐ A Protection of Waters permit is required for any excavation or filling below the mean high water line of any waterbodies identified above as "navigable."

☑ There are no waterbodies that appear on our regulatory maps at the location/project site you identified. Therefore, if there is a stream or pond outlet present at the site with year-round flow, it assumes the classification of the watercourse into which it feeds, LIKELY KIAMESHA LAKE-D-1-38-3-P44, Class "A", and a Protection of Waters permit is/is not required. If there is a stream or pond outlet present at the site that runs intermittently (seasonally), it is not protected, and a Protection of Waters permit is not required.

If a permit is not required, please note, however, you are still responsible for ensuring that work shall not pollute any stream or waterbody. Care shall be taken to stabilize any disturbed areas promptly after construction, and all necessary precautions shall be taken to prevent contamination of the stream or waterbody by silt, sediment, fuels, solvents, lubricants, or any other pollutant associated with the project.

FRESHWATER WETLANDS

☐ Your project/site is near or in Freshwater Wetland ________, Class _______. Be aware that a Freshwater Wetlands permit is required for any physical disturbance within these boundaries or within the 100 foot adjacent area. To have the boundary delineated, please read the attached notice.

RE: Mr. McNamara; Kiamesha Creek Vicinity per attached map Date: 9-10-08

☑ Your project/site is not within a New York State protected Freshwater Wetland. However, please contact your town officials and the United States Army Corps of Engineers in New York City, telephone (917) 790-8511 (Westchester/Rockland Counties), or (917) 790-8411 (other counties), for any permitting they might require.

STATE-LISTED SPECIES

☐ DEC has reviewed the State's Master Habitat Databank (MHDB) records. We have determined that the site is located within or near record(s) of the following state-listed species: ________________. If your inquiry is related to a specific development project, additional evaluation of the potential impacts of this project related to the sensitive resource(s) identified by this review, may be required. Please contact the person noted below.

☑ No records of sensitive resources were identified by this review.

OTHER: ____

____.

Please note that this letter only addresses the requirements for the following permits from the Department:
☑ Freshwater Wetlands ☑ Master Habitat Databank ☐ Other: ________________
☑ Protection of Waters
and that other permits from this Department or other agencies may be required for projects conducted on this property now or in the future. Also, regulations applicable to the location subject to this determination occasionally are revised and you should, therefore, verify the need for permits if your project is delayed or postponed. This determination regarding the need for permits will remain effective for a maximum of one year unless you are otherwise notified. Applications may be downloaded from our website at www.dec.ny.gov under "Programs" then "Division of Environmental Permits."

Please contact this office if you have questions regarding the above information. Thank you.

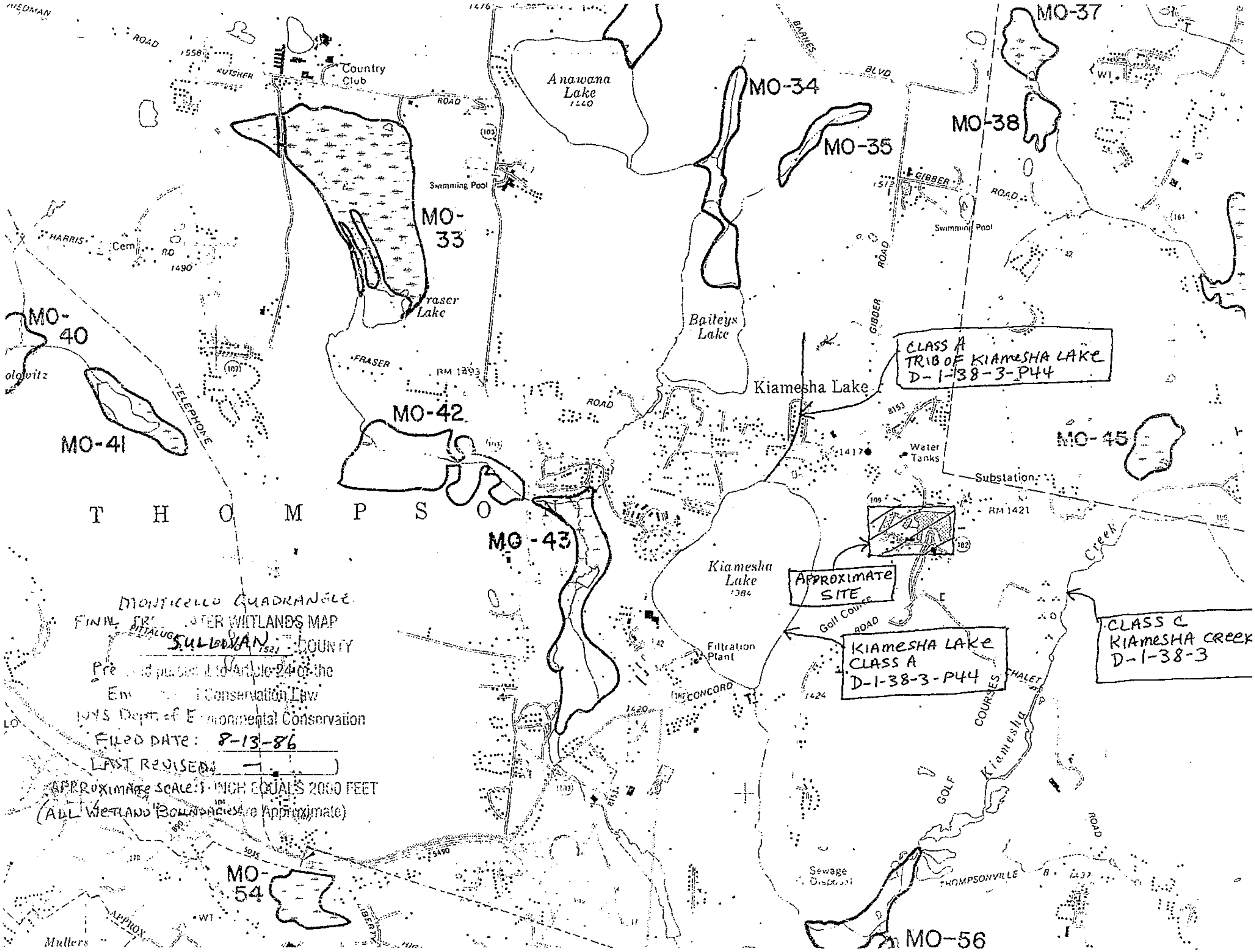
Sincerely,
Judith A. Blauvelt
Judith A. Blauvelt
Division of Environmental Permits
Region 3, Telephone No. 845/256-2250.

☑ Information/Permit Materials/Regulations/Map (Monticello Quadrangle) Attached.
☑ Web page information
☐ NYC DEP Contact Information (this site is within the NYC Watershed).
cc: A. Sheeran - DEC ________________

NOTE: Regarding erosion/sedimentation control requirements:

Stormwater discharges now require a SPDES Stormwater permit from this Department if they either:
- occur at industrial facilities and contain either toxic contaminants or priority pollutants OR
- result from construction projects involving the disturbance of one (1) or more acres of land.

Your project may be covered under one of two Statewide General Permits or may require an individual permit. If you believe your project would be covered under one of the General Permits and does not require any other DEC permits you may apply for coverage by filing a Notice of Intent with NYSDEC, Division of Water, 625 Broadway, Albany NY 12233-3505, (forms & permits available from this office or DEC Website at www.dec.ny.gov or call 518-402-8109). If your project involves other DEC permits, please contact the regional Division of Environmental Permits office (see above).


MO-37
MO-38
MO-34
MO-35
MO-33
MO-40
MO-41
MO-42
MO-43
MO-45
MO-54
MO-56
Anawana Lake 1440
Baileys Lake
Kiamesha Lake
Kiamesha Lake 1384
Fraser Lake
Country Club
Swimming Pool
Water Tanks
Substation
Filtration Plant
Sewage Disposal
T H O M P S O N
CLASS A
TRIB OF KIAMESHA LAKE
D-1-38-3-P44
APPROXIMATE SITE
KIAMESHA LAKE
CLASS A
D-1-38-3-P44
CLASS C
KIAMESHA CREEK
D-1-38-3
MONTICELLO QUADRANGLE
FINAL FRESHWATER WETLANDS MAP
SULLIVAN COUNTY
Prepared pursuant to Article 24 of the
Environmental Conservation Law
NYS Dept. of Environmental Conservation
FILED DATE: 8-13-86
LAST REVISED: —
APPROXIMATE SCALE: 1 INCH EQUALS 2000 FEET
(ALL WETLAND BOUNDARIES are Approximate)

6.0 REFERENCE DOCUMENTS & INFORMATION

- Remedial Investigation Workplan (7/24/08), prepared by SESI Consulting Engineers, PC
- Site Characterization Investigation Results for Concord Hotel Site (6/3/08), prepared by SESI
- Analytical Results Summary Plan for OU1A (SESI)
- USGS Topographic Quadrangle Maps - Monticello
- New York State Department of Environmental Conservation Website: www.dec.ny.gov
- New York State Department of Environmental Conservation "Fact Sheet" - Brownfield Cleanup Program
- New York State Department of Environmental Conservation "Checklist of Amphibians, Reptiles, Birds, and Mammals of New York State, Including Their Legal Status"
- A Guide to Aquatic Buffers: www.westchestergov.com
- Soil Survey of Sullivan County, NY, prepared by USDA Soil Conservation Service
- Ecological Communities of New York State - First and Second Editions
- The U.S. Geological Survey Webpage: www.usgs.gov/
- Town of Thompson Tax Map

7.0 QUALIFICATIONS

SANDRA E. KEHRLEY, P.E.
Hydrologist / Professional Engineer

Education

- A.S. in Engineering Science from **SUNY @ Morrisville**, New York
- B.S. in Forest Engineering, a dual forestry and civil engineering program, from **SUNY-Environmental Science & Forestry** @ Syracuse University.
- Cook College Office of Continuing Professional Education (Rutgers) including numerous courses in Wetlands Management, Geology/Hydrogeology, Non-Point Source (NPS) Pollution Analyses, Stormwater Management Design/Best Management Practices, and Ecology.

Professional Registrations and Memberships

- Professional Engineer, NJ PE License No. 38560
- Member, National Society of Professional Engineers

Experience

- Sandy Kehrley has twenty (20) years of professional experience in environmental engineering and consulting, with extensive experience in the preparation of SEQR Environmental Impact Studies (EIS), design of stormwater management systems, non-point source (NPS) pollutant and riparian corridor analyses (RCA), forest inventory identification of species, age, and growth characteristics, wildlife habitat suitability indices, Phase 1, 2, and 3 Environmental Site Assessments (ESA), NJDEP Preliminary Assessments (PA), landfill/solid waste closure plans, site remediation, hydrologic and hydraulic stream studies for streamflow characteristics, flood hazard area, floodplain and floodway modeling for stream corridor protection, quantifying the effects of development on stormwater quantity and quality, federal and state flood study changes, watershed modeling studies for nonpoint source pollution, pedestrian bridge design, conceptual site planning for residential development and county park trail design, comprehensive wetlands analyses including delineation, restoration, evaluation, and preparation of NJDEP, NYSDEC, and USCOE permit applications.

JOHN PEEL, P.P.
Professional Planner/Environmental Scientist

Education

- B.A. Earth Sciences & Environmental Geology (major degree) and English (minor concentration), **Fairleigh Dickinson University, Madison, New Jersey**
- Master of City and Regional Planning (MCRP), Environmental Policy & Planning concentration, **Rutgers University, New Brunswick, New Jersey (1988).**
- Cook College Office of Continuing Professional Education **(Rutgers)** including numerous courses in Wetlands Management, Threatened/Endangered Species & Habitat Analyses, Ecology, Stormwater Management, Hydrology, Hydrogeology, GIS Applications.

Professional Registration and Societies

- Society of Wetland Scientists, 1986
- Licensed Professional Planner (PP) #5211
- Member, American Planning Association (APA & NJAPA)
- Member, Urban Ecology

Experience

John Peel has twenty-three (23) years of project design and technical experience in land use planning, land stewardship, regulatory compliance, environmental sciences, and wetlands management. Mr. Peel is also licensed and experienced in environmental land use planning, preparation of Environmental Impact Studies and Assessments, preparation of Phase 1, 2, and 3 Environmental Site Assessments, NJDEP Preliminary Assessments, NJDEP Office of Environmental Service municipal matching grants, non-point source (NPS) and riparian corridor analyses (RCA), evaluations of planned wetlands, environmental resource evaluation for open space acquisitions, water resource planning, municipal consulting, habitat identification & restoration, development alternative analyses, and comprehensive wetlands analyses including delineation, restoration and mitigation/monitoring projects for USCOE, NJDEP, NYSDEC permitting and enforcement actions.

New York State Department of Environmental Conservation

Brownfield Cleanup Program

Citizen Participation Plan
for
The Concord Hotel & Resort Site
BCP Site Number: C353008

Concord Road
Kiamesha Lake
Sullivan County, New York

Revised October 2008

Contents

* * * * *

Note: The information presented in this Citizen Participation Plan was current as of the date of its approval by the New York State Department of Environmental Conservation. Portions of this Citizen Participation Plan may be revised during the brownfield site's remedial process.

Applicant: Concord Associates, LP
Site Name: The Concord Hotel & Resort Site
Site Address: Concord Road, Kiamesha Lake, Town of Thompson
Site County: Sullivan County
Site Number: C353008

1. What is New York's Brownfield Cleanup Program?

New York's Brownfield Cleanup Program (BCP) is designed to encourage the private sector to investigate, remediate (clean up) and redevelop brownfields. A brownfield is any real property where redevelopment or reuse may be complicated by the presence or potential presence of a contaminant. A brownfield typically is a former industrial or commercial property where operations may have resulted in environmental contamination. A brownfield can pose environmental, legal and financial burdens on a community. If the brownfield is not addressed, it can reduce property values in the area and affect economic development of nearby properties.

The BCP is administered by the New York State Department of Environmental Conservation (NYSDEC) which oversees Applicants that conduct brownfield site remedial activities.[1] An Applicant is a person whose request to participate in the BCP has been accepted by NYSDEC. The BCP contains investigation and remediation (cleanup) requirements, ensuring that cleanups protect public health and the environment. When NYSDEC certifies that these requirements have been met, the property can be reused or redeveloped for the intended use.

For more information about the BCP, go online at: **www.dec.state.ny.us/website/der/bcp**.

2. Citizen Participation Plan Overview

This Citizen Participation (CP) Plan provides members of the affected and interested public with information about how NYSDEC will inform and involve them during the investigation and remediation of the site identified above. The public information and involvement program will be carried out with assistance, as appropriate, from the Applicant.

Appendix A contains a map identifying the location of the site.

Project Contacts

Appendix B identifies NYSDEC project contact(s) to whom the public should address questions or request information about the site's remedial program. The public's suggestions about this CP Plan and the CP program for the site are always welcome. Interested people are encouraged to share their ideas and suggestions with the project contacts at any time.

---

[1] "Remedial activities", "remedial action", and "remediation" are defined as all activities or actions undertaken to eliminate, remove, treat, abate, control, manage, or monitor contaminants at or coming from a brownfield site.

Document Repositories

The locations of the site's document repositories also are identified in Appendix B. The document repositories provide convenient access to important project documents for public review and comment.

Site Contact List

Appendix C contains the brownfield site contact list. This list has been developed to keep the community informed about, and involved in, the site's investigation and remediation process. The brownfield site contact list will be used periodically to distribute fact sheets that provide updates about the status of the project. These will include notifications of upcoming remedial activities at the site (such as fieldwork), as well as availability of project documents and announcements about public comment periods.

The brownfield site contact list includes, at a minimum:

- chief executive officer and official(s) principally involved with relevant zoning and planning matters of each county, city, town and village in which the site is located;
- residents, owners, and occupants of the site and properties adjacent to the site;
- the public water supplier which services the area in which the site is located;
- any person who has requested to be placed on the site contact list;
- the administrator of any school or day care facility located on or near the site for purposes of posting and/or dissemination of information at the facility;
- document repositories.

Where the site or adjacent real property contains multiple dwelling units, the Applicant will work with NYSDEC to develop an alternative method for providing such notice in lieu of mailing to each individual. For example, the owner of such a property that contains multiple dwellings may be requested to prominently display fact sheets and notices required to be developed during the site's remedial process. This procedure would substitute for the mailing of such notices and fact sheets, especially at locations where renters, tenants and other residents may number in the hundreds or thousands, making the mailing of such notices impractical.

The brownfield site contact list will be reviewed periodically and updated as appropriate. Individuals and organizations will be added to the site contact list upon request. Such requests should be submitted to the NYSDEC project contact(s) identified in Appendix B. Other additions to the brownfield site contact list may be made on a site-specific basis at the discretion of the NYSDEC project manager, in consultation with other NYSDEC staff as appropriate.

CP Activities

Appendix D identifies the CP activities, at a minimum, that have been and will be conducted during the site's remedial program. The flowchart in Appendix E shows how these CP activities integrate with the site remedial process. The public is informed about these CP activities through fact sheets and notices developed at significant points in the site=s remedial process.

- **Notices and fact sheets** help the interested and affected public to understand contamination issues related to a brownfield site, and the nature and progress of efforts to investigate and remediate a brownfield site.

- **Public forums, comment periods and contact with project managers** provide opportunities for the public to contribute information, opinions and perspectives that have potential to influence decisions about a brownfield site's investigation and remediation.

The public is encouraged to contact project staff at any time during the site's remedial process with questions, comments, or requests for information about the remedial program.

This CP Plan may be revised due to changes in major issues of public concern identified in Section 6. or in the nature and scope of remedial activities. Modifications may include additions to the brownfield site contact list and changes in planned citizen participation activities.

3. Site Information

Site Description

The Concord Hotel and Resort Site located on Concord Road, Town of Thompson, Sullivan County (see attached map) applied for acceptance into New York State's Brownfield Cleanup Program (BCP) in May 2005. A total 14.5 acre portion of the Concord Hotel and Resort Site (the "BCP Site") was accepted into the program comprise of five, non-contiguous, Operable Units (OUs):

- OU-1A Main Hotel Area (Approx. 2 acres)
- OU-1B Gas Station and Disposal Area (Approx. 2 acres)
- OU-1C International Golf Clubhouse & Maintenance Building Area (Approx. 2 acres)
- OU-2 Golf Maintenance Building and Adjacent Disposal Area (Approx. 5 acres)
- OU-3 International Golf Course Disposal Area (Approx. 3.5acres)

The BCP Site is located on Concord Road, Kiamesha Lake, Town of Thompson, Sullivan County, New York. The BCP Site is located in a rural setting in the Catskill region of New York State. Areas around the Complex are a mix of commercial, recreational, residential and undeveloped land. A small shopping center, retail and food establishments are also located in the vicinity of the Site. The largest nearby municipality is the village of Monticello, approximately five miles northwest.

The Complex is located within the Delaware River Drainage Basin and also overlays the New Jersey Coastal Plain Sole Source Aquifer. Kiamesha Lake, a Class A waterbody, is located adjacent to the Site to the west. Kiamesha Lake is the water supply source for the village of Monticello. As such, the village has issued restrictions to protect the water, which prohibit disposal of wastes within close proximity to the lake and its tributaries.

Kiamesha Creek, a Class C stream, and its tributaries flow through the Site. Kiamesha Creek eventually reaches the Sheldrake Stream, which in turn connects with the Neversink River. The Neversink flows into the Delaware River. The Sheldrake Stream and Neversink River are Class B streams. The majority of the properties in the area around the site are serviced by the town of Thompson Water and Sewer Department. As discussed in the Phase II Report completed by Environmental Compliance Services, Inc. (ECSI), dated September 1998, the Leisure Time Water Company, a drinking water supply bottler, is located on the southwestern banks of Kiamesha Lake. The Kiamesha Artesian Spring Water Co. Is also located at the northeast portion of the Lake. The Kiamesha Artesian Spring Water Co. provides potable water to nearby Village and Town residents and businesses including the Concord facilities.

The planned redevelopment for the Complex includes the construction of a new hotel and recreation facility with retail establishments. The immense scale of this redevelopment initiative requires that it be completed in phases over time. Certain areas of the Complex will be redeveloped and activated prior to other areas, and work proposed at each OU will follow a similar phased approach.

Site History

The BCP associated facilities are part of an expansive Concord Resort Complex that was built in stages over the past 80 years. Previously, the area was either farm land or forested. The Concord Hotel was built in the 1920s on pristine land on the shore of Kiamesha Lake. It was used exclusively by New York City residents as a summer retreat.

The resort area continued to expand through the 1960s, by which time the site was similar to its current layout. At this time, several of the Main Hotel buildings no longer existed. Some of these demolished buildings were evidently buried on site (ECSI, 1998) within the resort complex.

Subsequently, the hotel site was abandoned and illegal dumping occurred. Each on-site building also had an attached heating oil underground storage tanks (USTs) and associated fuel distribution lines and dispensers. Some buildings also had gasoline USTs. Some of these USTs leaked over time. A number of PCB Transformers were also on site, some of which it was recently discovered had leaked.

Environmental History

Due to the Site's history, areas of contamination are present with respect to various organic and inorganic compounds, metals and PCBs. In addition, previous Phase I Environmental Site Assessments (ESCI, Inc. and S&W Redevelopment of North America, LLC), and the more recent Remedial Investigation performed pursuant to the Remedial Investigation Work Plan (RIWP) approved by the Department in October 2007, identified petroleum constituents associated with various Underground Storage Tanks (USTs), fuel distribution lines and dispensers.

The Remedial Investigation (RI) implemented in accordance with the Brownfield Cleanup Agreement (BCA) between the volunteer/owner of the site, Concord Associates, L.P., and the New York State Department of Environmental Conservation (NYSDEC) has been completed on the Main Hotel Area (OU-1A), however, RIs at the International Golf Clubhouse & Maintenance Building Area (OU-1B) Gas Service Station (OU-1C), International Golf Course Disposal Area (OU-3D), and Golf Maintenance Building and Adjacent Disposal Area (OU-2E) operable units are ongoing. Key findings of the RI for OU-1A are summarized below and the status of the RI investigation of the other Ous is also described below under the title of each OU.

The Main Hotel Area (OU-1A)
The Main Hotel Area (Main Hotel) is located in the northwest portion of the Complex on the west side of Concord Road. The Hotel area was occupied by several buildings that comprised the historic Concord Hotel.

The Hotel Area has several potential Areas of Concern (AOCs) throughout this area, including Underground Storage Tanks (USTs) and pole-mounted transformers located along the north and east BCP boundaries. Throughout the Site, USTs have historically leaked and have impacted the surrounding soils. Only the USTs positioned along Route 109 are addressed in this BCA.

The RI approach was to characterize subsurface soil and groundwater in proximity to and down-gradient of known and/or suspected contamination sources at the site, which were identified in three areas of concern (AOCs):

<u>AOC 1 – USTs along County Road 109</u> – A total of thirteen (13) samples, collected from six locations (Boring No. 9, 10, 12, 13, 14, and 15) in and around the vicinity of two (2) large 15,000-gallon #4 fuel oil USTs, and a 1,500-gallon UST that reportedly contained #2 fuel oil and/or kitchen waste, revealed fuel oil related semi-volatile organic compounds (SVOCs) in four out of the six borings and metals contaminant in one of the borings. While none of the volatile organic compounds (VOCs) in detected in Boring 15 exceeded the Track 1 unrestricted standards, total petroleum hydrocarbon (TPH) readings in this boring were high, ranging from 180 to 5,800 mg/kg at depths of 11 to 26.5 ft-bgs. The two (2) 15,000-gallon USTs are located near the intersection of County Route 109 and Concord Road, and the smaller UST was located near a kitchen entrance fronting County Route 109. Copper, nickel, and zinc were detected above applicable SCGs in Boring No. 9 at depths of 0 to 0.5 ft-bgs. Copper was detected at a concentration of 126 mg/kg which exceeds the Track 1 SCO of 50 mg/kg. Nickel was detected at a concentration of 37.7 mg/kg which exceeds the Track 1 SCO of 30 mg/kg. Zinc was

detected at a concentration of 236 mg/kg which exceeds the Track 1 SCO of 109 mg/kg. An investigation of the groundwater in the vicinity of AOC 1 revealed the presence of several dissolved metals (specifically iron, manganese, and sodium) and one SVOC compound, bis(2-ethylhexyl)phthalate, above applicable standards, criteria, and guidance (SCGs). In addition to this groundwater contamination an extremely viscous Light Non-Aqueous Phase Liquid (LNAPL) was encountered in a fractured bedrock seam during installation of MW-7. Subsequent laboratory analysis was only able to characterize the LNAPL as a "tar substance." Temporary monitoring wells were installed into bedrock in the area surrounding MW-7 to delineate the extent of the LNAPL plume. The horizontal extent of the delineated plume is approximately 150 x 300 square feet and is depicted on Figure 4 in the RIR.

AOC 2 – 20,000 Gallon UST at the Corner of County Road 109 and Concord Road – A total of three (3) samples were collected to characterize this AOC – one sample from one boring (Boring No. 18) in the immediately vicinity of the UST and two additional samples collected from a boring location advanced beyond the extent of AOC 2 (Boring No. 11). One groundwater sample was collected from a monitoring well installed in the vicinity of AOC 2. This suspect large 20,000-gallon UST was believed to be located beneath the existing roadways in this area. Soil and groundwater samples do not indicate a discharge to the environment from this tank; however, this will be confirmed when the tank is removed during the remedial action.

AOC 3 – Pole- and Concrete Pad-Mounted Transformers – Telephone pole-mounted electrical transformers in three locations, including two concrete pad-mounted electrical transformers (total of nine OU-1A transformers) were sampled to evaluate for the presence and concentration of Polychlorinated Biphenyls (PCBs) and five (5) out of (9) transformers contained PCBs. Two soil samples, one surficial and one at the fill-native soil strata interface, were collected from the two transformers in OU-1A containing detectable levels of PCBs (T-10 and T-13). At both locations, surficial soil samples contained PCBs at concentrations below the Track 1 SCOs. As a precautionary measure since there was some evidence of surficial soil PCB contamination, during August through September 2008, the nine OU-1A transformers were removed in accordance with the NYSDEC-approved Transformer Removal Interim Remedial Measure Work Plan, last revised August 4, 2008. One of the transformers contained PCB concentrations above 50 mg/kg and had to be shipped off-site as hazardous waste.

In addition to characterization in and around the AOCs, a comprehensive investigation included collecting additional environmental media samples in soil, groundwater, and soil vapor throughout the boundaries of the OU.

Soil - Additional soil samples were also taken throughout OU-1A, which revealed metals and pesticide contamination above the Track 1 SCOs. Lead and copper were detected in Boring No. 1 at depths of 0 – 10.5 ft-bgs respectively. Lead was detected at a concentration of 155 mg/kg, which exceeds the Track 1 SCO of 63 mg/kg. Copper was detected at a concentration of 203 mg/kg, which exceeds the Track 1 SCO of 50 mg/kg. The pesticide, 4,4'-DDT, was detected in Boring No. 6 at a depth of 0 – 0.5 ft-bgs. Its concentration was 0.029 mg/kg, which exceeds the Track 1 SCO of 0.0033 mg/kg.

Groundwater – As part of the overall OU-1A investigation, one groundwater sample was also collected from monitoring well MW-4, which revealed detections of chlordane, several pesticides including DDD, DDE and DDT and a number of metals, including lead and mercury, in unfiltered samples above their respective cleanup standards.

The Gas Station and Disposal Area (OU-1B).

The Gas Station and Disposal Area (Service Station) operable occupies approximately 2-acres located southeast of the Main Hotel Area on the east side of Concord Road between Rock Ridge Drive and Kiamesha Lake Road.

The Gas Station has AOCs associated with facilities that exist or existed at one time including several USTs , and drums and debris within the building. RI activities in this OU are currently in progress.

The International Golf Clubhouse & Maintenance Building Area (OU-1C).

The International Golf Clubhouse and Maintenance Building Area (International Clubhouse) operable unit occupies approximately 1.5-acres located south of the Main Hotel Area on the east side of Concord Road.

The areas of concern include a former above ground UST that was located adjacent to the clubhouse; a former disposal area located on the east side of the site; and the former maintenance area attached to the clubhouse. RI activities in this OU are currently in progress.

The Golf Maintenance Building and Adjacent Disposal Area (OU-2).

The Golf Maintenance Building and Adjacent Disposal Area (Maintenance Garage Area) operable unit occupies approximately 5.5 acres located on the west side of Chalet Road approximately 1¼ mile south of the intersection of County Highway 109 (Kiamesha Lake Road) and Chalet Road.

The Maintenance Garage Area areas of concern include several USTs, stored pesticides, herbicides, and fertilizers, a disposal area on the south portion of the OU; and Kiamesha Creek adjacent to the site. RI activities in this OU are currently in progress.

The International Golf Course Disposal Area (OU-3).

The International Golf Course Disposal Area operable unit occupies approximately 3.5-acres located on the west side of Chalet Road approximately 1 mile south of the intersection of County Highway 109 (Kiamesha Lake Road) and Chalet Road. The entire fill area is an area of concern. Previous investigation activities have adequately characterized materials within the fill. RI activities in this OU are currently in progress.

4. Remedial Process

Note: See Appendix E for a flowchart of the brownfield site remedial process.

Application

The Applicant applied for New York's Brownfield Cleanup Program in May 2005 as a Volunteer and entered into a Brownfield Cleanup Agreement with the State in December 2005 as a Volunteer. This means that the Applicant was not responsible for the disposal or discharge of the contaminants or whose ownership or operation of the site took place after the discharge or disposal of contaminants. The Volunteer must fully characterize the nature and extent of contamination on the BCP Site, and must conduct a "qualitative exposure assessment," a process that characterizes the actual or potential exposures of people, fish and wildlife to contaminants on the site and to contamination that has migrated from the site.

The Applicant in its Application proposes that the BCP Site will be used for restricted commercial and residential purposes.

To achieve this goal, the Applicant will conduct remedial activities at the site with oversight provided by NYSDEC and the NYSDOH. The Brownfield Cleanup Agreement executed by NYSDEC and the Applicant sets forth the responsibilities of each party in conducting a remedial program at the site.

Investigation

The remedial investigation (RI) of the BCP site is performed with NYSDEC oversight. The Applicant must develop a remedial investigation work plan (RIWP), which is subject to public comment as noted in Appendix D. The Applicant developed such a RIWP, which was subject to public comment the end of 2007. The goals of the investigation are as follows:

1) Define the nature and extent of contamination in soil, surface water, groundwater and any other impacted media;

2) Identify the source(s) of the contamination;

3) Assess the impact of the contamination on public health and/or the environment; and

4) Provide information to support the development of a Remedial Work Plan to address the contamination, or to support a conclusion that the contamination does not need to be addressed.

The Applicant has prepared an RI Report for OU-1A and will continue to prepare RIRs for the other OUs after it completes the RI in each are of the BCP Site. This report will summarize the results of the RI and will include the Applicant's recommendation of whether remediation is needed to address site-related contamination. The RI Report is subject to review and approval by NYSDEC. Before the RI Report is approved, a fact sheet that describes the RI Report will be sent to the site's contact list.

NYSDEC will determine if the site poses a significant threat to public health and/or the environment. If NYSDEC determines that the site is a "significant threat," a qualifying community group may apply for a Technical Assistance Grant (TAG). The purpose of a TAG is to provide funds to the qualifying community group to obtain independent technical assistance. This assistance helps the TAG recipient to interpret and understand existing environmental information about the nature and extent of contamination related to the site and the development/implementation of a remedy.

An eligible community group must certify that its membership represents the interest of the community affected by the site, and that its members' health, economic well-being or enjoyment of the environment may be affected by a release or threatened release of contamination at the eligible site.

For more information about the TAG Program and the availability of TAGs, go online at: **www.dec.state.ny.us/website/der/guidance/tag** .

Remedy Selection

After NYSDEC approves the RI Report, the Applicant will be able to develop a Remedial Action Work Plan (RAWP) if remediation is required. The Remedial Action Work Plan describes how the Applicant would address the contamination related to the site. As noted above, a RAWP has been prepared for OU-1A.

The public will have the opportunity to review and comment on the draft RAWP. The site contact list will be sent a fact sheet that describes the draft RAWP and announces a 45-day public comment period. NYSDEC will factor this input into its decision to approve, reject or modify the draft RAWP.

A public meeting may be held by NYSDEC about the proposed RAWP if requested by the affected community, and if significant substantive issues are raised about the draft RAWP. Please note that, in order to request a public meeting, the health, economic well-being or enjoyment of the environment of those requesting the public meeting must be threatened or potentially threatened by the site. In addition, the request for the public meeting should be made within the first 30 days of the 45-day public comment period for the draft Remedial Action Work Plan. A public meeting also may be held at the discretion of the NYSDEC project manager in consultation with other NYSDEC staff as appropriate.

Construction

Approval of the Remedial Action Work Plan by NYSDEC will allow the Applicant to design and construct the alternative selected to remediate the site. The site contact list will receive notification before the start of site remediation. When the Applicant completes remedial activities, it will prepare a Final Engineering Report that certifies that remediation requirements have been achieved or will be achieved within a specific time frame. NYSDEC will review the report to be certain that the remediation is protective of public health and the environment for the intended use of the site. The site contact list will receive a fact sheet that announces the completion of remedial activities and the review of the final engineering report.

Certificate of Completion and Site Management

Once NYSDEC approves the Final Engineering Report, it will issue the Applicant a Certificate of Completion. This Certificate states that remediation goals have been achieved, and relieves the Applicant from future remedial liability subject to statutory conditions. The Certificate also includes a description of any institutional and engineering controls or monitoring required by the approved remedial work plan. If the Applicant uses institutional controls or engineering controls to achieve remedial objectives, the site contact list will receive a fact sheet that discusses such controls.

An institutional control is a non-physical restriction on use of the brownfield site, such as a deed restriction that would prevent or restrict certain uses of the remediated property. An institutional control may be used when the remedial action leaves some contamination that makes the site suitable for some, but not all uses.

An engineering control is a physical barrier or method to manage contamination, such as a cap or vapor barrier.

Site management will be conducted by the Applicant as required. NYSDEC will provide appropriate oversight. Site management involves the institutional and engineering controls required for the brownfield site. Examples include: operation of a water treatment plant, maintenance of a cap or cover, and monitoring of groundwater quality.

5. Citizen Participation Activities

CP activities that have already occurred and are planned during the investigation and remediation of the site under the BCP are identified in Appendix D: Identification of Citizen Participation Activities. These activities also are identified in the flowchart of the BCP process in Appendix E. NYSDEC will ensure that these CP activities are conducted, with appropriate assistance from the Applicant.

All CP activities are conducted to provide the public with significant information about site findings and planned remedial activities, and some activities announce comment periods and request public input about important draft documents such as the Remedial Work Plan.

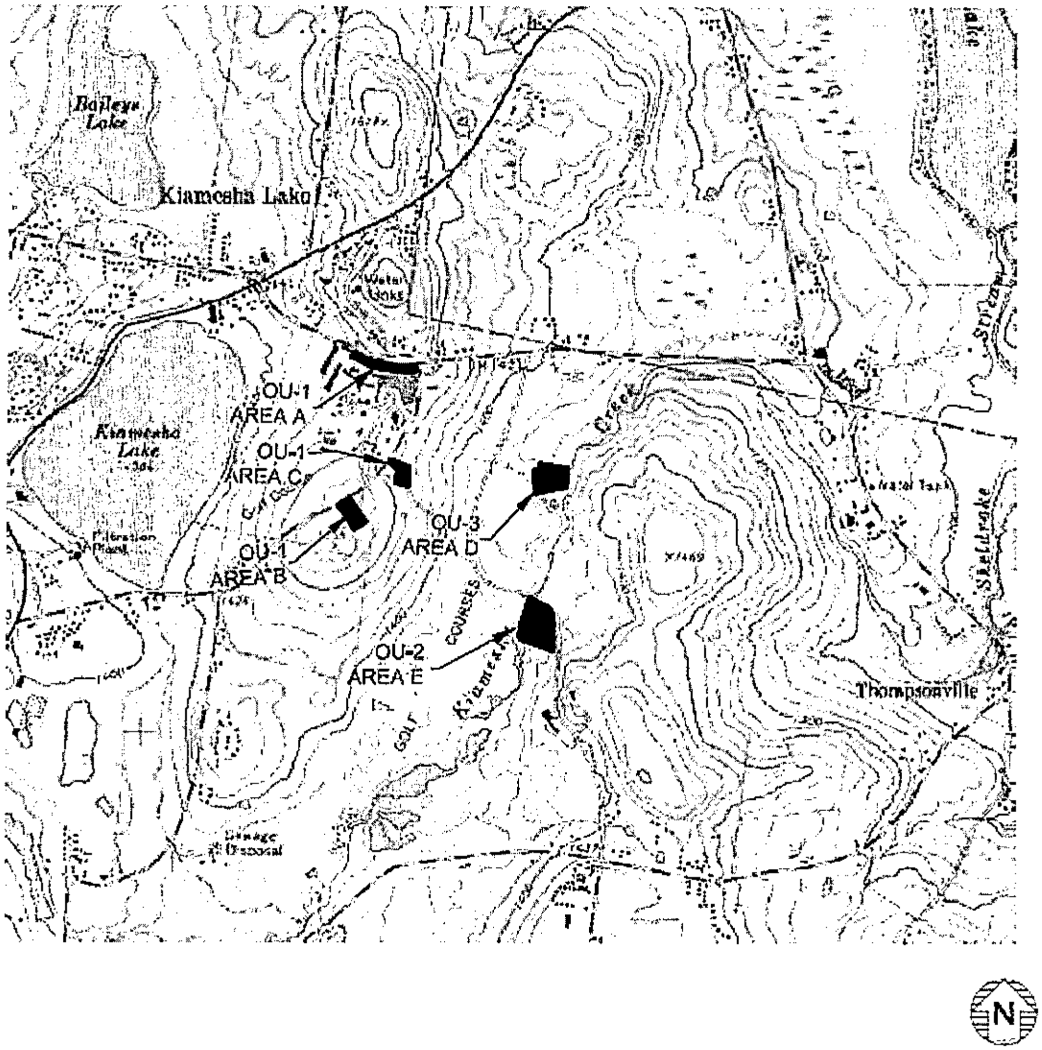
All written materials developed for the public will be reviewed and approved by NYSDEC for clarity and accuracy before they are distributed. Notices and fact sheets can be combined at the discretion, and with the approval of, NYSDEC.

6. Major Issues of Public Concern

This section of the CP Plan identifies major issues of public concern, if any, that relate to the site. Additional major issues of public concern may be identified during the site's remedial process.

Currently, there are no identified major issues of public concern. The project underwent an extensive State Environmental Review Act (SEQRA) Environmental Impact Statement (EIS process, which analyzed and mitigated project impacts. Although possible impacts during the remediation could occur to various media, including Lake Kiamesha and the Kiamesha Creek, these potential impacts will be avoided, minimized or mitigated through a number of controls.

Appendix A – Site Location Map



SITE LOCATION MAP
CONCORD HOTEL AND RESORT

DESIGNED BY: DG	DATE PREPARED: 6-17-05
DRAWN BY: YY	SCALE: NTS
CHECKED BY: DG	PROJECT NO.: 7180
	FIGURE: FIG-1

SESI CONSULTING ENGINEERS — SOILS / FOUNDATIONS, SITE DESIGN, ENVIRONMENTAL

REFERENCE:
MAP TAKEN FROM USGS 7.5 MINUTE SERIES TOPOGRAPHIC QUADRANGLES MONTICELLO & WOODRIDGE (1956, PHOTOREVISED 1982)

NOTES:
BROWNFIELD OPERABLE UNIT LOCATIONS TAKEN FROM A PLAN PREPARED BY S & W REDEVELOPMENT OF NORTH AMERICA, LLC.

Appendix B – Project Contacts and Document Repositories

Project Contacts

For information about the site's remedial program, the public may contact any of the following project staff:

New York State Department of Environmental Conservation (NYSDEC):

James Candiloro
Project Manager
NYSDEC
Division of Environmental Remediation
165 Broadway 11^{th} Floor
Albany, NY 12233
(518) 402-9564

Michael Knipfing
Citizen Participation Specialist
NYSDEC Region 3
Division of Environmental Remediation
21 South Putt Corners Rd.
New Paltz, New York 12561
(845) 256-3154

New York State Department of Health (NYSDOH):

Fay Navratil
Project Manager
NYSDOH
Flannigan Square
547 River Street
Troy, NY 12180
(800) 458-1158 ext.28750

Document Repositories

The document repositories identified below have been established to provide the public with convenient access to important project documents:

Crawford Public Library
Reference Desk
187 Broadway #189
Monticello, NY 12701
(845) 794-4660

NYSDEC Region 3
New Paltz Office
21 South Putt Corners Rd.
New Paltz, New York 12561
(845) 256-3154

Hours:
Mon., Tues., Thurs., Fri. 10:00 am – 6:00 pm
Wednesday - 10:00 am – 7:30 pm
Saturday - 11:00 am – 3:00 pm
Sunday - Closed

Appendix C – Brownfield Site Contact List

The following mailing list has been developed to help NYSDEC keep the community informed about and involved in the remedial process for the Concord Hotel & Resort Site. The list includes adjacent property owners, local officials, environmental groups and local media. This list will be reviewed periodically and updated as appropriate.

Note: the adjacent/affected property owner and resident portion of the list is maintained confidentially in project files at the NYSDEC Region 3 Office.

Federal Elected Officials

Senator Hillary R. Clinton
United States Senate
476 Russell Senate Office Building
Washington, D.C. 20510

Senator Charles Schumer
United States Senate
313 Hart Senate Office Building
Washington, D.C. 20510

Representative Maurice Hinchey
291 Wall St.
Kingston, NY 12401

State Officials

Willie Janeway, Regional Director
NYSDEC – Region 3 Office
21 South Putt Corners Road
New Paltz, New York 12561

Wendy Rosenbach, Public Affairs Officer
NYSDEC – Region 3 Office
21 South Putt Corners Road
New Paltz, New York 12561

Ram Pergadia
NYSDEC – Region 3 Office
21 South Putt Corners Road
New Paltz, New York 12561

Richard Baldwin
NYSDEC – Region 3 Office
21 South Putt Corners Road
New Paltz, New York 12561

Michael J. Knipfing
Citizen Participation Specialist
NYSDEC – Region 3 Office
21 South Putt Corners Road
New Paltz, New York 12561

Rosalie Rusinko, Esq.
100 Hillside Ave. Ste #1W
White Plains, NY 10603-2860

Michelle Tipple
Project Manager
NYSDEC – Region 3 Office
21 South Putt Corners Road
New Paltz, New York 12561

Peg Duke
NYSDEC – Region 3 Office
21 South Putt Corners Road
New Paltz, New York 12561

Sal Ervolina
NYSDEC
625 Broadway
Albany, New York 12233

Harold Evans
NYSDEC
625 Broadway
Albany, New York 12233

Fay Navratil
NYSDOH
Flannigan Square
547 River Street
Troy, NY 12180

Gary Litwin
Bureau Director of Environmental Exposure Investigation
NYSDOH
Flannigan Square
547 River Street
Troy, NY 12180

State Elected Officials

Senator John J. Bonacic
Room 815 Legislative Office Building
Albany, NY 12247

Assembly Member Aileen M. Gunther
Legislative Office Building 435
Albany, NY 12248

County and Town Officials

County Manager David Fanslau
100 North Street
County Government Center
Monticello, NY 12701

Sullivan County Clerk
Daniel Briggs
100 North Street
County Government Center
Monticello, NY 12701

Mayor James Barnicle
Village of Monticello
2 Pleasant Street
Monticello, New York 12701

Commissioner Dr. William J. Pammer Jr.
Sullivan County Planning and Environmental Management
Sullivan County Governor Center
100 North Street, P.O. Box 5012
Monticello, NY 12701-5192

Director
New York State Department of Health
Monticello District Office
50 North Street #2
Monticello, NY 12701

Richard Martinkovic
Public Safety Commissioner
P.O. Box 5012
Monticello, NY 12701

Robert A. Meyer P.E.
Public Work Commissioner
P.O. Box 5012
Monticello, NY 12701

Anthony Cellini
Town of Thompson Supervisor
4052 Route 42
Monticello, NY 12701

James Lyttle
Town of Thompson Planning Board Chairman
4052 Route 42
Monticello, NY 12701

Chairman
Village of Monticello Planning Board
2 Pleasant Street
Monticello, New York 12701

Chairman
Village of Monticello Zoning Board
2 Pleasant Street
Monticello, New York 12701

Councilman Peter Briggs
4052 Route 42
Monticello, NY 12701

Councilman William Rieber
4052 Route 42
Monticello, NY 12701

Councilman Muniquka Diaz-Corley
4052 Route 42
Monticello, NY 12701

Councilman Sharon Jankiewicz
4052 Route 42
Monticello, NY 12701

Clarence A. Decker
2 Pleasant Street
Monticello, New York 12701

Donald S. Price
Town Clerk, Town of Thompson
4052 Route 42
Monticello, NY 12701

Raymond Nargizian, Manager
Village of Monticello
2 Pleasant Street
Monticello, New York 12701

Jonathan Rouis, Chairman
Sullivan County Legislature
100 North Street
P.O. Box 5012
Monticello, New York 12701-5192

Ann Marie Martin, Clerk
Sullivan County Legislature
100 North Street
P.O. Box 5012
Monticello, New York 12701-5192

Ron Hiatt
Sullivan County Legislature
100 North Street
P.O. Box 5012
Monticello, New York 12701-5192

Edith Schop, Clerk
Village of Monticello
2 Pleasant Street
Monticello, New York 12701

Dr. James Green, Chairman
Environmental Council
4052 Rt. 42
Monticello, New York 12701

Media

Editor
Hudson Valley Business Journal
86 East Main Street
Wappingers Falls, New York 12590

Editor
The River Reporter
P.O. Box 150
Narrowsburg, NY 12764

Editor
The Sullivan County Democrat
P.O. Box 1035
10 St. John Street
Monticello, NY 12701

Editor
The Times Herald Record
40 Mulberry Street
P.O. Box 2046
Middletown, NY 10940

Editor
The Towne Crier
PO Box 312
8 Pearl Street
Livingstone Manor, NY 12758

News Director
Time Warner Cable 6
27 Industrial Drive
Middletown, NY 10940

News Director
Hudson Valley News Network
42 Marcy Lane
Middletown, NY 10941

News Director
WDNB
286 Broadway
Monticello, NY 12701

News Director
WJFF Radio Catskill
4765 State Rt. 52
P.O. Box 546
Jeffersonville, NY 12748

News Director
WSUL
P.O. Box 98.3
198 Bridgeville Rd.
Monticello, NY 12701

News Director WVOS
Mountain Broadcasting Corp
Sullivan Avenue
Liberty, NY 12754

News Director
WRNN
721 Broadway
Kingston, New York 12401

News Director
WDLA
34 Chestnut Street
Oneonta, New York 13820

Lisa Phillips, Bureau Chief
WAMC
44 Main Street
Kingston, NY 12401

City Editor
Tri-State Gazette
84-88 Fowler Street
Port Jervis, NY 12771

News Director
WDLC
P.O. Box 920
Port Jervis, NY 12771

News Director
WELV/WFKP
20 Tucker Drive
Poughkeepsie, NY 12601

News Director
WPDH/WEOK/WCZX
P.O. Box 416
Poughkeepsie, NY 12602

Other Interested Parties

Crawford Public Library – Reference Desk
189 Broadway
Monticello, NY 12701

Sullivan County Solid Waste Conservation District
69 Ferndale Loonis Road
Liberty, New York 12754

Nature Conservancy
Eastern N.Y. Chapter
265 Chestnut Ridge Road
Mount Kisco, New York 10549

Environmental Citizens Coalition
33 Central Avenue
Albany, New York 12210-2204

Sierra Club
Atlantic Chapter
353 Hamilton Street
Albany, New York 12201-1709

NYPIRG
Attn: Laura Haight
107 Washington Avenue
Albany, New York 12210

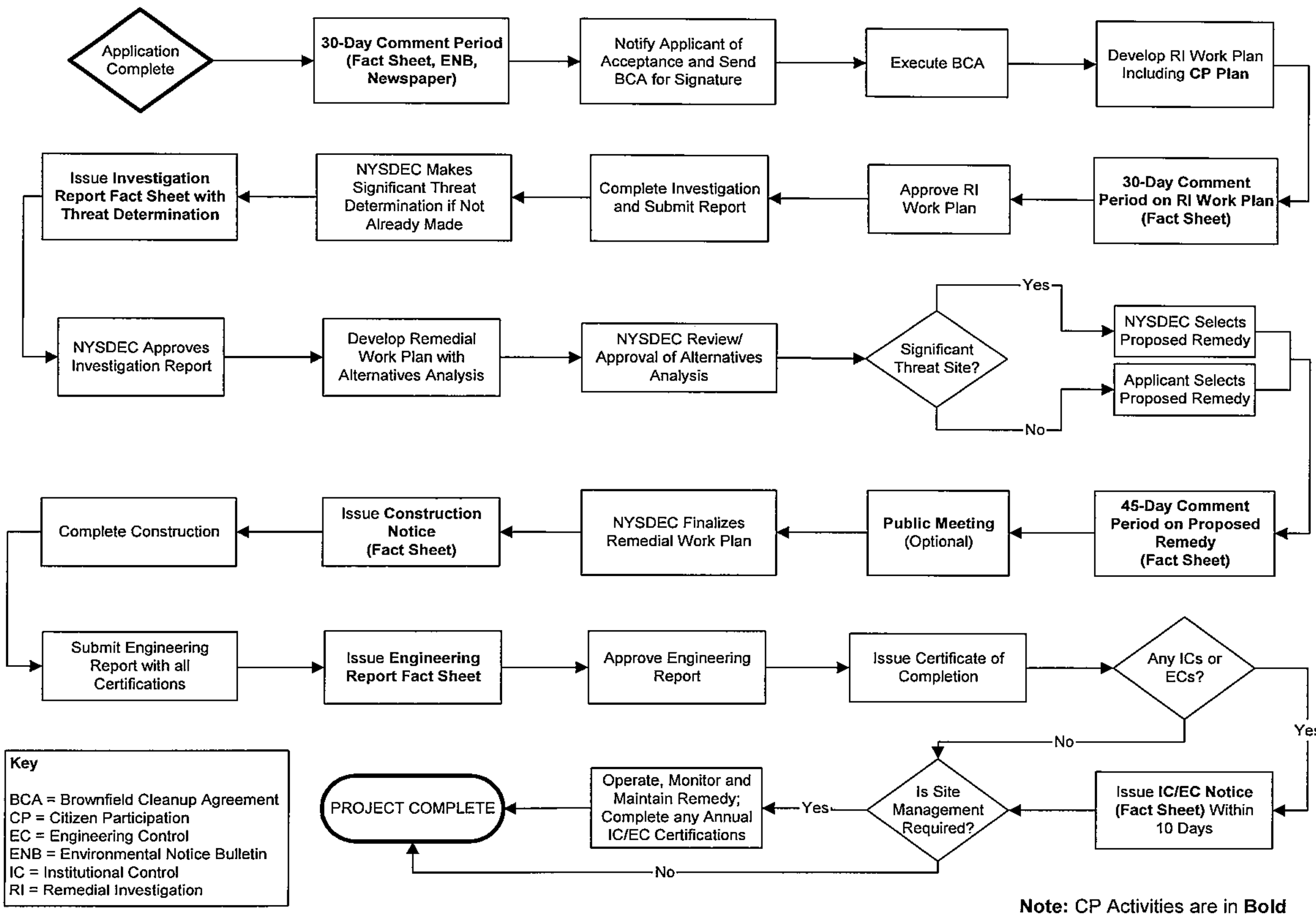
Orange Environment
P.O. Box 25
Goshen, NY 10924

Leisure Time Spring Water
P.O. Box 168
Kiamesha, NY 12751

Appendix D – Identification of Citizen Participation Activities

Required Citizen Participation (CP) Activities	CP activity(ies) Occur at this Point
Application Process:	
· Prepare brownfield site contact list (BSCL) · Establish document repositories	May 2005
· Publish notice in Environmental Notice Bulletin (ENB) announcing receipt of application and 30-day comment period ·Publish above ENB content in local newspaper · Mail above ENB content to BSCL	Dec 2005
After Execution of Brownfield Site Cleanup Agreement:	
· Prepare citizen participation (CP) plan	Updated October 2008 This Version
After Remedial Investigation (RI) Work Plan Received:	
· Mail fact sheet to BSCL about proposed RI activities and announcing 30-day public comment period on draft RI Work Plan	October 2007
After RI Completion:	
· Mail fact sheet to BSCL describing results of RI	October 2008 for OU-1A
After Remedial Action Work Plan (RAWP) Received:	
·Mail fact sheet to BSCL about proposed RAWP and announcing 45-day comment period ·Public meeting by NYSDEC about proposed RAWP (if requested by affected community or at discretion of NYSDEC project manager in consultation with other NYSDEC staff as appropriate)	October 2008 for OU-1A
After Approval of RAWP:	
·Mail fact sheet to BSCL summarizing upcoming remedial construction	Before the start of remedial construction.
After Remedial Action Completed:	
· Mail fact sheet to BSCL announcing that remedial construction has been completed · Mail fact sheet to BSCL announcing issuance of Certificate of Completion (COC)	At the time NYSDEC approves Final Engineering Report. These two fact sheets should be combined when possible if there is not a delay in issuance of COC.

Appendix E – Brownfield Cleanup Program Process



Note: CP Activities are in **Bold**

Community Air Monitoring Plan

The Concord Hotel & Resort
Brownfield Cleanup Program Site #C353008
Town of Thompson, Sullivan County, New York

D.1 - INTRODUCTION

This document presents a Community Air Monitoring Plan for the Concord Hotel & Resort Brownfield Cleanup Program (BCP) site (BCP Site No. C353008, BCA Index No. W3-1004-04-06) in the Town of Thompson, Sullivan County, New York. The BCP site consists of five separate areas, referred to as Operable Units (Ous), within the approximately 1,729-acre Concord Hotel & Resort (Site). The five Ous include:

- **OU-1A** **AREA "A"** Main Hotel Area (Approx. 22.5ac.),
- **OU-1B** **AREA "B"** International Golf Clubhouse & Maintenance Building Area (Approx. 2ac.),
- **OU-1C** **AREA "C"** Gas Station and Disposal Area (Approx. 2ac),
- **OU-2** **AREA "E"** Golf Maintenance Building and Adjacent Disposal Area (Approx 5ac)
- **OU-3** **AREA "D"** International Golf Course Disposal Area (Approx 3.5acres)

The planned redevelopment plan for the Complex includes the construction of a new hotel and recreation facility with retail establishments. The immense scale of this redevelopment initiative requires that it be completed in phases over time. Certain areas of the Complex will be redeveloped and activated prior to other areas, and work proposed at each OU will follow a similar approach.

In order to support the proposed future use of the property, a voluntary Remedial Investigation (RI) will be completed at the site in accordance with a Brownfield Cleanup Agreement (BCA). Under the terms of the BCA, the Volunteers must define the nature and extent of site contamination in a manner that enables the selection of an appropriate remediation strategy to support the site's contemplated future use. SESI Consulting Engineers, P.C. will complete the site investigation on behalf of the Volunteers. This Community Air Monitoring Plan (CAMP) describes the measures that will be undertaken during field work to monitor ambient air at the downwind site perimeter.

D.2 - OBJECTIVES

The objective of this CAMP is to provide a measure of protection for the downwind community from potential airborne contaminant releases that might arise as a result of the planned fieldwork, which will include test pits, soil borings, monitoring wells, excavations, temporary soil stockpiling and removal of contaminated soil.

D.3 - METHODS

The CAMP will include monitoring for volatile organic compounds (VOCs) and particulate matter (e.g., airborne "dust") when deemed by SESI to be applicable. Readings will be recorded and will be available for State (DEC and DOH) personnel to review, as requested.

D.3.1 VOC MONITORING

When deemed by SESI to be applicable, a MiniRAE photoionization detector (PID) will be used to measure VOCs in air. VOCs will be monitored at the downwind perimeter of the site, based on the prevailing wind direction as determined at the beginning of each workday. The site perimeter is defined as the existing property boundary.

Upwind concentrations of VOCs will be measured at the beginning of every workday to establish background conditions. VOC concentrations will be measured continuously at the property boundary directly downwind of the work area. Downwind data will be checked as needed to provide a measure of assurance that contaminants are not being spread off site through the air. The PID will continuously record and store VOC measurements such that a 15-minute running average can be computed for the data each time the PID is checked.

- If the ambient air concentration for total organic vapors at the downwind property boundary exceeds 5 parts per million (ppm) above background for a 15-minute average, work activity will be halted and monitoring will continue until levels decline to below 5 ppm over background. At this point, work will resume and monitoring will continue.

- If total organic vapor levels at the downwind property boundary persist at levels above 5 ppm over background but less than 25 ppm, work activities will be halted, the source of the vapors will be identified, and corrective actions will be taken to abate emissions. Work will resume after organic vapor levels fall to below 5 ppm over background at the downwind property boundary.

- If organic vapor levels exceed 25 ppm at the downwind, property boundary activities will be shut down. An appropriate course of action to abate emissions in order to resume work will be discussed with NYSDEC personnel.

D.3.2 PARTICULATE MONITORING

When deemed by SESI to be applicable, particulate (e.g. "dust") emissions will be measured continuously at the upwind and downwind property boundaries. Real time monitoring equipment (e.g. MiniRAM or equivalent), with audible alarms and capable of measuring particulate matter less than 10 micrometers in size, will be used.

- If the downwind particulate level is 100 micrograms per cubic meter (ug/m3) greater than background (upwind) for a 15-minute period, then dust suppression techniques will be employed. Work will continue with dust suppression provided that downwind particulate levels do not exceed 150 ug/m3 above upwind levels and provided that no visible dust is migrating from the work area.

- If, after dust suppression techniques, downwind particulate levels are greater than 150 ug/m3 above upwind levels, work will be stopped and a re-evaluation of activities will be initiated. Work will resume, provided that dust suppression measures and other controls are successful in reducing downwind particulate concentrations to within 150 ug/m3 of the upwind level and in preventing visible dust migration.

Quality Assurance Project Plan

Concord Hotel and Resort
Brownfield Cleanup Program Site #C353008
Town of Thompson, Sullivan County, New York

1.0 PROJECT DESCRIPTION

This document presents a quality assurance and quality control protocols for the Concord Hotel & Resort Brownfield Cleanup Program (BCP) site (BCP Site No. C353008, BCA Index No. W3-1004-04-06) in the Town of Thompson, Sullivan County, New York. The BCP site consists of five separate areas, referred to as Operable Units (Ous), within the approximately 1,729-acre Concord Hotel & Resort Complex (Complex). The five Ous include:

- **OU-1A** **AREA "A"** Main Hotel Area (Approx. 22.5ac.),
- **OU-1B** **AREA "B"** International Golf Clubhouse & Maintenance Building Area (Approx. 2ac.),
- **OU-1C** **AREA "C"** Gas Station and Disposal Area (Approx. 2ac),
- **OU-2** **AREA "E"** Golf Maintenance Building and Adjacent Disposal Area (Approx 5ac)
- **OU-3** **AREA "D"** International Golf Course Disposal Area (Approx 3.5acres)

Both a Remedial Action Work Plan (RAWP) and Interim Remedial Measures Plan (IRMP) have been prepared, in accordance with the Brownfield Cleanup Agreement (BCA) between the volunteer/developer Concord Associates, L.P. and the New York State Department of Environmental Conservation (NYSDEC), to provide a systematic assessment of environmental conditions on the property. This Quality Assurance Project Plan (QAPP) is presented as part of the RAWP and IRMP to define the methods, operating procedures, and quality control measures that will govern the conduct of the Remedial Actions (RA).

2.0 PROJECT ORGANIZATION

The RA will be conducted and/or observed by Soils Engineering Services, P.C. (SESI), on behalf of the BCP volunteer/applicant, Concord Associates, L.P. The organization of SESI's key project management and field staff, and respective areas of responsibility, is presented below.

2.1 Project Principal

Michael W. St. Pierre, P.E.
Provide technical and administrative oversight and guidance throughout the project, assist in securing company resources, participate in technical review of deliverables, and attend key meetings as needed.

2.2 Principal Engineer

Christopher F. Zwingle, P.E.
Provide technical guidance and review of reports, analytical data. Will have key involvement in screening and development of remedial alternatives.

2.3 Project Manager

Steven P. Byszewski, P.E.
Responsible for maintaining the day-to-day schedule for completing the fieldwork and deliverables according to BCP program requirements and client expectations.

2.4 Remedial Investigation Program Manager

Gregory J. Quimby, P.E.
Responsible for coordinating and directing field efforts of SESI staff and subcontractors, and for maintaining that work is done according to QAPP specifications.

2.5 Field Team Leader

Robert Fioretti
Responsible for overseeing field work during the RA, including observing subcontractors, maintaining field notes, and collecting samples of various environmental media, in accordance with the NYSDEC-approved Work Plan.

3.0 QA/QC OBJECTIVES FOR MEASUREMENT OF DATA

In cases where NYSDOH ELAP Certification exists for a specific group or category of parameters, the laboratories performing analysis in connection with this project will have appropriate NYSDOH ELAP Certification. For analysis of samples where Analytical Service Protocol (ASP, June 2000) Category B deliverables are required, NYSDOH ELAP CLP certification is required.

Detection limits set by NYSDEC-ASP (June 2000) will be used for all sample analyses unless otherwise noted. If NYSDEC-ASP-dictated detection limits prove insufficient to assess project goals (i.e., comparison to drinking water standards or attainment of ARARs), then ASP Special Analytical Services (SAS) or other appropriate methods will be utilized.

The quality assurance/quality control objectives for all measurement data include completeness, representativeness, comparability, precision and accuracy.

3.1 COMPLETENESS

The analyses performed must be appropriate and inclusive. The parameters selected for analysis are chosen to meet the objectives of the study.

Completeness of the analyses will be assessed by comparing the number of parameters intended to be analyzed with the number of parameters successfully determined and validated. Data must meet QC acceptance criteria for 100 percent or more of requested determinations.

3.2 REPRESENTATIVENESS

Samples must be taken of the population and, where appropriate, the population will be characterized statistically to express the degree to which the data accurately and precisely represent a characteristic of a population, parameter variations at a sampling point, a process, or environmental condition.

Non-dedicated sampling devices will be cleaned between sampling points by washing and rinsing with pesticide-grade methanol, followed by a thorough rinse with distilled water. Specific cleaning techniques are described in the Field Sampling Procedure. Two types of blank samples will accompany each sample set where Target Compound List (TCL) volatiles are to be analyzed (water matrix only). A trip blank, consisting of a 40 ml VOA vial of organic-free water prepared by the laboratory, will accompany each set of sample bottles from the laboratory to the field and back. This bottle will remain sealed throughout the shipment and sampling process. This blank will be analyzed for TCL volatile organic compounds along with the groundwater samples to ensure that contamination with TCL volatile compounds has not occurred during the bottle preparation, shipment and sampling phase of the project. In order to check for contaminant carryover when non-dedicated sampling equipment is used, a rinsate blank will be submitted to the laboratory. This blank will also be analyzed for TCL volatile organic compounds. The TCL compounds are identified in the United States Environmental Protection Agency (USEPA) Contract Laboratory Program dated 7/85 or as periodically updated.

The analysis results obtained from the determination of identical parameters in field duplicate samples can be used to further assess the representativeness of the sample data.

3.3 COMPARABILITY

Consistency in the acquisition, preparation, handling and analysis of samples is necessary in order for the results to be compared where appropriate. Additionally, the results obtained from analyses of the samples will be compared with the results obtained in previous studies, if available.

To ensure the comparability of analytical results with those obtained in previous or future testing, all samples will be analyzed by NYSDEC-approved methods. The NYSDEC-ASP mandated holding times for various analyses will be strictly adhered to.

3.4 PRECISION AND ACCURACY

The validity of the data produced will be assessed for precision and accuracy. Analytical methods which will be used include gas chromatography/mass spectrometry (GC/MS), gas chromatography (GC), colorimetry, atomic spectroscopy, gravimetric and titrametric techniques. The following outlines the procedures for evaluating precision and accuracy, routine monitoring procedures, and corrective actions to maintain analytical quality control. All data evaluations will be consistent with NYSDEC-ASP procedures (June 2000). Data will be 100 percent compliant with NYSDEC-ASP requirements.

The requirements of QA/QC are both method specific and matrix dependent. The number of duplicate, spiked and blank samples analyzed will be dependent upon the total number of samples of each matrix to be analyzed, but there will be at least one split per matrix. The inclusion and frequency of analysis of field blanks and trip blanks will be on the order of one per each site. Samples to be analyzed for volatile organic compounds will be accompanied by trip and field blanks (water matrix) or field blanks (soil, sediment matrices).

Quality assurance audit samples will be prepared and submitted by the laboratory QA manager for each analytical procedure used. The degree of accuracy and the recovery of analyte to be expected for the analysis of QA samples and spiked samples is dependent upon the matrix, method of analysis, and compound or element being determined. The concentration of the analyte relative to the detection limit is also a major factor in determining the accuracy of the measurement. The lower end of the analytical range for most analyses is generally accepted to be five times the detection limit. At or above this level, the determination and spike recoveries for metals in water samples will be expected to range from 75 to 125 percent. The recovery of organic surrogate compounds and matrix spiking compounds determined by GC/MS will be compared to the guidelines for recovery of individual compounds as established by the United States Environmental Protection Agency Contract Laboratory Program dated 7/85 or as periodically updated.

The quality of results obtained for inorganic ion and demand parameters will be assessed by comparison of QC data with laboratory control charts for each test.

4.0 SAMPLING PROCEDURES

4.1 SAMPLING PROGRAM

The sampling program for this project will include surface water, groundwater, soil, sediment, and soil vapor. Soil samples will be collected from split spoon sampling devices retrieved from soil borings. Groundwater samples will be collected from groundwater monitoring wells. Sediment and surface water samples will be collected as grab samples from pre-determined locations along the Kiamesha Creek, which bisects the site. Soil vapor samples will be collected from soil vapor monitoring wells.

4.1.1 Drilling/Sampling Procedures

Soil, groundwater, and soil vapor samples will be collected by means of a soil boring program. Soil borings shall be completed using the hollow stem auger drilling methods, direct push methods, or rotary drilling methods, whichever methods are determined to be best suited to site conditions by the SESI project manager and SESI field team leader.

Soil samples will be collected from soil borings and analyzed in accordance with the NYSDEC-approved Work Plan. Monitoring wells for groundwater and soil vapor sample collection will be installed in completed soil borings. Either hollow stem auger (HSA) or direct push drilling methods may be utilized for monitoring well completion.

Samples of the encountered surface materials shall be collected continuously during drilling so that a complete soil profile is examined and described by the SESI field geologist. The sampling method employed shall be ASTM D-1586/Split Barrel Sampling using a standard 2-foot long, 2-inch outside diameter split- spoon sampler with a 140-pound hammer, in cases where HSA methods are used. Upon retrieval of the sampling barrel, the collected sample shall be placed in glass jars and labeled, stored on site (on ice in a cooler if necessary), and transmitted to the appropriate testing laboratory or storage facility. Chain-of-custody procedures will be practiced following Section 15, EPA-600/4-82-029, Handbook for Sampling and Sample Preservation of Water and Waste Waters.

A geologist or engineer will be on site during the drilling operations to fully describe each soil sample, following the New York State Soil Description Procedure, and to retain representative portions of each sample.

The drilling contractor will be responsible for obtaining accurate and representative samples, informing the geologist of changes in drilling pressure, keeping a separate general log of soils encountered including blow counts [i.e., the number of blows from a soil sampling drive weight (140 pounds)] required to drive the split-spoon sampler in 6-inch increments and installing monitoring wells to levels directed by the supervising geologist following specifications further outlined in this protocol.

4.1.2 Monitoring Well Completion

Monitoring wells will be constructed of 10 feet of .010-inch slot size PVC well screen and riser casing. Other materials utilized for completion will be washed silica sand (Q-Rock No. 4 or approved equivalent) bentonite grout, Portland cement, and a protective steel locking well casing and cap with locks.

The monitoring well installation method for wells installed within unconsolidated sediments shall be to place the screen and riser assembly into the casing once the screen interval has been selected. At that time, a washed silica sand pack will be placed around the well screen if required to prevent screen plugging. If a sand pack is not warranted, the auger string will be pulled back to allow the native aquifer material to collapse 2 to 3 feet above the top of the screen. Bentonite pellets will then be added to the annulus between the casing and the inside auger to insure proper sealing. Cement/bentonite grout will continue to be added during the extraction of the augers until the entire aquifer thickness has been sufficiently sealed off from horizontal and/or vertical flow above the screened interval. During placement of sand and bentonite pellets, frequent measurements will be made to check the height of the sand pack and thickness of bentonite layers by a weighted drop tape measure.

A bolt-down protective curb box will be installed, flush with the ground, or steel "stick-up" protective casing and secured by a Portland cement seal. The cement seal shall extend laterally at least 1 foot in all directions from the protective casing and shall slope gently away to drain water away from the well.

4.1.3 Well Development

All monitoring wells will be developed or cleared of all fine-grained materials and sediments that have settled in or around the well during installation so that the screen is transmitting representative portions of the groundwater. The development will be by one of two methods, pumping or bailing groundwater from the well until it yields relatively sediment-free water.

A decontaminated pump or bailer will be used and subsequently decontaminated after each use following procedures outlined in the Decontamination Protocol. Pumping or bailing will cease when the turbidity falls below 50 NTUs or until specific conductivity, pH, and temperature are stable (i.e., consecutive readings are within 10 percent with no overall upward or downward trends in measurements). Well development water will be disposed of on the ground surface at each well location or contained in drums as conditions warrant.

4.1.4 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 will be decontaminated before any drilling on site begins, between each well, and prior to removing any equipment from the site. The preferred decontamination procedure will be to use a high pressure steam cleaner to remove soils and volatile organics from the equipment. The water used for this procedure will be contained and shall come from a controlled source, preferably a municipal drinking supply. Representative samples of the contained decontamination water and well development water will be screened in the field to determine the proper method of disposal. Every effort will be made to minimize the generation of contaminated water.

4.2 Groundwater Sampling Program.

4.2.1 Well Evacuation

Prior to sampling a monitoring well, the static water level will be recorded and the wells evacuated to assure that the water in the well is truly representative of the groundwater. All well data will be recorded on a field sampling record. For shallow wells or deep wells with a relatively low static water level, evacuation will be accomplished by using a stainless steel or teflon bailer with a ball check valve at its lower end. A bladder may be used to evacuate the deeper wells at a rate of approximately 1 gpm. Water samples to be analyzed for volatile and/or semi-volatile organics must be sampled by bailer.

4.2.2 Sampling Procedure

Groundwater samples will be collected using either stainless steel, teflon, or disposable polyethylene bailers with a ball check valve at the lower end. Incorporation of a check valve onto the bailers assures that a sample is representative of the depth to which the bailer is lowered. All samples will be removed from a depth just above the well screen to further assure a representative groundwater sample. Before and after sampling, the sampling device will be cleaned inside and out with soapy water, methanol, and then rinsed with distilled deionized water. Sampling procedures are summarized on Table 4.2.

In addition to water samples collected from the monitoring wells, two types of "blanks" will be collected and submitted to the chemical laboratory for analyses. The blanks will consist of 40 ml VOA vials, as follows:

A trip blank will be prepared before the sample bottles are sent by the laboratory. It consists of a sample of distilled, deionized water which accompanies the other sample bottles into the field and back to the laboratory. A trip blank will be included with each shipment of samples where sampling and analysis for TCL volatiles is planned (water matrix only). The trip blank will be analyzed for TCL volatile organic compounds as a measure of the internal laboratory procedures and their effect on the results.

4.3 Soil Vapor Sampling

Soil vapor sampling will be conducted in accordance with NYSDOH Guidance for Evaluating Indoor Air Intrusion in New York State (February 2005). Soil vapor samples will be collected in the vadose zone from shallow (5 feet) well points. Each well point will be installed in a shallow boring drilled either by hand-operated equipment (e.g. hand auger or percussion hammer drill), or by a small truck-mounted drill rig. Drilling equipment used shall be based on soil conditions, and the method that provides the most practical approach.

Each well point will consist of an inert sampling tube (polyethylene, stainless steel, or Teflon®) with a 6-inch screened section at the bottom through which soil vapors can be sampled. The screen slot size will be 0.0075 inches. A sampling zone will be created around the screened section by backfilling with 1 to 2 feet of porous course sand or glass beads, and at least three feet of bentonite will be placed above the porous sampling zone to form a seal from the surface. Native clean soil will be packed around the remaining annulus to the ground surface.

Each designated soil vapor sampling location will be purged of a minimum of three volumes using a low volume pump, and then attached to a regulator, and secured with a clamp. The regulator will then be attached to a 1-liter summa canister.

The regulator will be set to collect a soil vapor sample at a flow rate of less than 0.2 liters per minute. After the summa canister is filled, the valve will be closed.

Each canister will be listed according to a specific sample I.D. on a chain of custody form. Sample canisters will be delivered to the laboratory within 24 hours, and analyzed for VOCs by method TO-15. The detection limit for VOCs will be 1 μg/m3 or less.

The soil vapor sampling effort will include the use inert helium tracer gas to verify that the soil vapor samples are not diluted by ambient air. The atmosphere around the sampling tube will be enriched with the tracer gas, and the soil vapor sample will be collected in the presence of the enriched tracer atmosphere. This will be accomplished by placing an inverted plastic pail over the sampling point, and filling the pail with the tracer gas via a small tube penetrating the site of the pail. Refer to NYSDOH Guidance for Evaluating Indoor Air Intrusion in New York State (February 2005).

Weather conditions in the 48 hours prior to the test, and during the test, will be noted, including average wind speed, precipitation, temperature, and barometric pressure.

4.4 SAMPLE PRESERVATION AND SHIPMENT

Since all bottles will contain the necessary preservatives as shown in Table 4.1, they need only be filled. The 40 ml VOA vials must be filled brim full with no air bubbles. The other bottles should be filled to within about 1 inch from the top.

The bottles will be sent from the laboratory in coolers which will be organized on a per site basis. Following sample collection, the bottles should be placed on ice in the shipping cooler. The samples will be cooled to 4°C, but not frozen.

Final packing and shipment of coolers will be performed in accordance with guidelines outlined in the "User's Guide to the CLP".

5.0 SAMPLE CUSTODY

The program for sample custody and sample transfer is in compliance with the NYSDEC-ASP, as periodically updated. If samples may be needed for legal purposes, chain-of-custody procedures, as defined by NEIC Policies and Procedures (USEPA-330/9-78-001-R, Revised June 1988) will be used. Sample chain-of-custody is initiated by the laboratory with selection and preparation of the sample containers. To reduce the chance for error, the number of personnel handling the samples should be minimized.

5.1 FIELD SAMPLE CUSTODY

A chain-of-custody record accompanies the sample from initial sample container selection and preparation at the laboratory, shipment to the field for sample containment and preservation, and return to the laboratory. Two copies of this record follow the samples to the laboratory. The laboratory maintains one file copy and the completed original is returned to the site inspection team. Individual sample containers provided by the laboratory are used for shipping samples. The shipping containers are insulated and chemical or ice water is used to maintain samples at approximately 4°C until samples are returned and in the custody of the laboratory. All sample bottles within each shipping container are individually labeled and controlled. Samples are to be shipped to the laboratory within 24-48 hours of the day of collection.

Each sample shipping container is assigned a unique identification number by the laboratory. This number is recorded on the chain-of-custody record and is marked with indelible ink on the outside of the shipping container. The field sampler will indicate the sample designation/location number in the space provided on the appropriate chain-of-custody form for each sample collected. The shipping container is closed and a seal provided by the laboratory is affixed to the latch. This seal must be broken to open the container, and this indicates possible tampering if the seal is broken before receipt at the laboratory. The laboratory will contact the site investigation team leader and the sample will not be analyzed if tampering is apparent.

5.2 LABORATORY SAMPLE CUSTODY

The site investigation team leader or Project Quality Assurance Officer notifies the laboratory of upcoming field sampling activities and the subsequent transfer of samples to the laboratory. This notification will include information concerning the number and type of samples to be shipped as well as the anticipated date of arrival.

The laboratory sample program meets the following criteria:

1. The laboratory has designated a sample custodian who is responsible for maintaining custody of the samples and for maintaining all associated records documenting that custody.
2. Upon receipt of the samples, the custodian will check the original chain-of-custody documents and compare them with the labeled contents of each sample container for correctness and traceability. The sample custodian signs the chain-of-custody record and records the date and time received.

3. Care is exercised to annotate any labeling or descriptive errors. In the event of discrepant documentation, the laboratory will immediately contact the site investigation team leader as part of the corrective action process. A qualitative assessment of each sample container is performed to note any anomalies, such as broken or leaking bottles. This assessment is recorded as part of the incoming chain-of-custody procedure.
4. The samples are stored in a secured area at a temperature of approximately 4°C until analyses are to commence.
5. A laboratory chain-of-custody record accompanies the sample or sample fraction through final analysis for control.
6. A copy of the chain-of-custody form will accompany the laboratory report and will become a permanent part of the project records.

5.3 FINAL EVIDENCE FILES

Final evidence files include all originals of laboratory reports and are maintained under documented control in a secure area.

A sample or an evidence file is under custody if:

- It is in your possession; it is in your view, after being in your possession.
- It was in your possession and you placed it in a secure area.
- It is in a designated secure area.

6.0 CALIBRATION PROCEDURES

Instruments and equipment used to gather, generate or measure environmental data will be calibrated with sufficient frequency and in such a manner that accuracy and reproducibility of results are consistent with the appropriate manufacturer's specifications or project specific requirements. The procedures for instrument calibration, calibration verification, and the frequency of calibrations are described in the NYSDEC-CLP. The calibration of instruments used for the determination of metals will be as described in the appropriate CLP standard operating procedures.

Calibration of other instruments required for measurements associated with these analyses will be in accordance with the manufacturer's recommendations and the standard operating procedures of the laboratory.

7.0 ANALYTICAL PROCEDURES

Analytical procedures shall conform to the most recent revision of the NYSDEC-ASP (June 2000) and are summarized on Table 7.1. In the absence of USEPA or NYSDEC guidelines, appropriate procedures shall be submitted for approval by NYSDEC prior to use.

The procedures for the sample preparation and analysis for organic compounds are as specified in the NYSDEC-ASP. Analytical cleanups are mandatory where matrix interferences are noted. No sample shall be diluted any more than 1 to 5. The sample shall be either re-extracted, re-sonicated, re-stream distilled, etc. or be subjected to any one analytical cleanup noted in SW846 or a combination thereof. The analytical laboratory shall expend such effort and discretion to demonstrate good laboratory practice and demonstrate an attempt to best achieve the method detection limit.

7.1 VOLATILE ORGANICS (VOA)

For the analysis of water samples for Target Compound List (TCL), volatile organic compounds (VOCs), no sample preparation is required. The analytical procedure for volatiles is detailed in NYSDEC-ASP (Volume I, Section D-I). A measured portion of the sample is placed in the purge and trap apparatus and the sample analysis is performed by gas chromatography/mass spectrometry for the first round. USEPA Method 8260 will be used, plus tentatively identified compounds (TICs). USEPA Methods 8010 or 8020 (gas chromatography with different detectors) will be used if subsequent rounds with lower limits of detection are warranted.

7.2 SEMI-VOLATILE ORGANIC COMPOUNDS

The extraction and analytical procedures used for preparation of water, soil and sediment samples for the analysis of the TCL semi-volatile organic compounds are described in NYSDEC-ASP Volume I, Section D-III. USEPA Method 8270 will be used, plus tentatively identified compounds (TICs).

Instrument calibration, compound identification, and quantization are performed as described in Section 6 of this document and in the NYSDEC-ASP.

7.3 PESTICIDE AND PCB COMPOUNDS

The sample preservation procedures for gas chromatography for pesticides and PCB's will be as described in the NYSDEC-ASP methods (Section D-IV). The analysis of standard mixes, blanks and spiked samples will be performed at the prescribed frequency with adherence to the 72-hour requirement described in the method.

7.4 METALS

Water, soil and waste samples will be analyzed for the metals listed in Table 7.1. The detection limits for these metals are as specified in the NYSDEC-ASP, Section D-V. The instrument detection limits will be determined using calibration standards and procedures specified in the NYSDEC-ASP. The detection limits for individual samples may be higher due to the sample matrix. The procedures for these analyses will be as described in the NYSDEC-ASP.

The digestion procedures for water samples are not recommended for samples requiring analysis for mercury, arsenic or selenium. The aliquot of sample analyzed for As and Se will be prepared using the modifications described in USEPA Methods 206.2 CLP-M and 270.2 CLP-M, respectively. Analysis for mercury requires a separate digestion procedure (245.1 CLP-M, or 245.2 CLP-M).

The analyses for metals will be performed by atomic absorption spectroscopy (AAS) or inductively-coupled plasma emission spectroscopy (ICPES), as specified in the ASP with regard to AAS flame analysis.

7.5 SITE SPECIFICITY OF ANALYSES

Work plans prepared for remedial investigation waste sites contain recommendations for the chemical parameters to be determined for each site. Thus, some or all of the referenced methods will apply to the analysis of samples collected at the individual waste sites. Analyses of Target Compound List (TCL) analytes will be performed on all samples.

TABLE 4.1 – SAMPLE CONTAINERIZATION

ANALYSIS	NO.	BOTTLE TYPE	PRESERVATIVE(1)	HOLDING TIME(2)
Water Samples				
GC/MS(extractable) and pesticides/PCBs	2	1-liter glass bottle	None	5 days (until extraction, 40 days extracted)
GC/MS (VOA)	2	40 mil, glass vial with septum cap	None	7 days
Metals(3)	1	1 liter, plastic bottle	Nitric acid to pH <2	6 months Mercury: 26 days
Soil, Sediment, Solid Waste				
TCL organics		Wide mouth, plastic or glass	None	7 days (until extraction, 40 days extracted)
TCL inorganics		Wide mouth, plastic or glass	None	6 months Cyanide: 12 days Mercury: 28 days

(1) All samples will be preserved with ice during collection and shipment.
(2) From verified time of sample receipt by the analytical laboratory (within 24 to 48 hours of collection).
(3) Metals refers to the 24 metals and cyanide in the Target Compound List (NYSDEC-CLP 11/87).

TABLE 4.2 – SAMPLING PROCEDURE FOR MONITORING WELLS

1. Initial static water level recorded with an electric contact probe accurate to the nearest 0.1 foot.

2. Sampling device and electric contact probe decontaminated.
    a. Sampling device and probe are rinsed with pesticide-grade methanol and distilled water.
    b. Methanol is collected into a large funnel which empties into a five- gallon container.

3. Sampling device lowered into well.
    a. Bailer lowered by dedicated PVC or polypropylene line.

4. Sample taken.
    a. Sample is poured slowly from the open end of the bailer and the sample bottle tilted so that aeration and turbulence are minimized.
    b. Duplicate sample is collected when appropriate.

5. Samples are capped, labeled and placed in laboratory coolers with ice packs or bagged ice.

6. All equipment is cleaned with successive rinses of pesticide-grade methanol and distilled water.
    a. Dedicated line is disposed of or left at well site.

7. Equipment/wash blanks are collected when non-dedicated sampling equipment is used.

8. Chain-of-custody forms are completed in triplicate.
    a. The original and one carbon copy are put into a zip-lock bag and placed into the cooler.

9. The original will be returned following sample analysis.
    a. A second carbon copy is kept on file.

10. Cooler is sealed with strapping tape and chain-of-custody seals to assure integrity and to prevent tampering of sample.

TABLE 4.3 – SAMPLING PROCEDURE FOR MONITORING WELLS USING LOW-STESS (LOW-FLOW) METHODS

1. Initial static water level recorded with an electric contact probe accurate to the nearest 0.1 foot.

2. Sampling device is lowered into well. Slowly lower the pump, safety cable, tubing and electrical lines into the well to the depth specified for that well. Pump intake must be no less than 2 feet from the bottom of the well to prevent disturbance and resuspension of sediments which may be at the bottom of the well.

3. Measure water level again: Before starting the pump, measure the water level again with the pump in the well. Leave the water level measuring device in the well.

4. Purge Well: Start pumping the well at 200 to 500 milliliters per minute (ml/min). The water level should be monitored approximately every five minutes. Ideally, a steady flow rate should be maintained that results in a stabilized water level (drawdown of 0.3 ft or less). Pumping rates should, if needed, be reduced to the minimum capabilities of the pump to ensure stabilization of the water level. As noted above, care should be taken to maintain pump suction and to avoid entrainment of air in the tubing. Record each adjustment made to the pumping rate and the water level measured immediately after each adjustment.

5. Monitor Indicator Parameters: During purging of the well, monitor and record the field indicator parameters (turbidity, temperature, specific conductance, pH, Eh, and DO) approximately every five minutes. The well is considered stabilized and ready for sample collection when the indicator parameters have stabilized for three consecutive readings as follows (Puls and Barcelona, 1996):

    a. 0.1 for pH
    b. 3% for specific conductance (conductivity)
    c. 10 mv for redox potential
    d. 10% for DO and turbidity

6. Dissolved oxygen and turbidity usually require the longest time to achieve stabilization. The pump must not be removed from the well between purging and sampling.

7. Collect Samples: Collect samples at a flow rate between 100 and 250 ml/min and such that drawdown of the water level within the well does not exceed the maximum allowable drawdown of 0.3 ft. VOC samples must be collected first and directly into sample containers. All sample containers should be filled with minimal turbulence by allowing the ground water to flow from the tubing gently down the inside of the container.

8. Ground water samples to be analyzed for volatile organic compounds (VOCs) require pH adjustment. The appropriate EPA Program Guidance should be consulted to determine whether pH adjustment is necessary. If pH adjustment is necessary for VOC sample preservation, the amount of acid to be added to each sample vial prior to sampling should be determined, drop by drop, on a separate and

equal volume of water (e.g., 40 ml). Groundwater purged from the well prior to sampling can be used for this purpose.

9. Remove Pump and Tubing: After collection of the samples, the tubing, unless permanently installed, must be properly discarded or dedicated to the well for resampling by hanging the tubing inside the well.

10. Measure and record well depth.

11. Close and lock the well.

12. Samples are capped, labeled and placed in laboratory coolers with ice packs or bagged ice.

13. All equipment is cleaned with successive rinses of pesticide-grade methanol and distilled water.

    a. Dedicated line is disposed of or left at well site.

14. Equipment/wash blanks are collected when non-dedicated sampling equipment is used.

15. Chain-of-custody forms are completed in triplicate.

    a. The original and one carbon copy are put into a zip-lock bag and placed into the cooler. The original will be returned following sample analysis.
    b. A second carbon copy is kept on file.

16. Cooler is sealed with strapping tape and chain-of-custody seals to assure integrity and to prevent tampering of sample.

TABLE 7-1 – CONTRACT-REQUIRED QUANTITATION LEVELS AND ANALYTICAL METHODS FOR ASP INORGANICS, ASP VOLATILES, ASP SEMI-VOLATILES, ASP PESTICIDES, AND PCBS

Superfund Target Compound List (TCL) and Contract-Required Quantitation Limit

SECTION 1 - ASP INORGANICS Method: NYSDEC-ASP-91-4					
	PARAMETER	CONTRACT-REQUIRED DETECTION LEVEL* (µg/l)		PARAMETER	CONTRACT-REQUIRED DETECTION LEVEL* (µg/l)
1.	Aluminum	200	13.	Magnesium	5,000
2.	Antimony	60	14.	Manganese	15
3.	Arsenic	10	15.	Mercury	0.2
4.	Barium	200	16.	Nickel	40
5.	Beryllium	5	17.	Potassium	5,000
6.	Cadmium	5	18.	Selenium	5
7.	Calcium	5,000	19.	Silver	10
8.	Chromium	10	20.	Sodium	5,000
9.	Cobalt	50	21.	Thallium	10
10.	Copper	25	22.	Vanadium	50
11.	Iron	100	23.	Zinc	20
12.	Lead	3	24.	Cyanide	10

SECTION 2 – ASP ORGANICS (VOLATILES) Method: NYSDEC-ASP-91-1					
	VOLATILE	CONTRACT-REQUIRED QUANTITATION LIMIT** (µg/l)		VOLATILE	CONTRACT-REQUIRED QUANTITATION LIMIT** (µg/l)
1.	Chloromethane	10	18.	1,2-Dichloropropane	10
2.	Bromomethane	10	19.	cis-1,3-Dichloropropene	10
3.	Vinyl Chloride	10	20.	Trichloroethene	10
4.	Chloroethane	10	21.	Dibromochloromethane	10
5.	Methylene Chloride	10	22.	1,1,2-Trichloroethane	10
6.	Acetone	10	23.	Benzene	10
7.	Carbon Disulfide	10	24.	Trans-1.3-Dichloropropene	10
8.	1,1-Dichloroethylene	10	25.	Bromoform	10
9.	1,1-Dichloroethane	10	26.	2-Hexanone	10
10.	1,2-Dichloroethylene (total)	10	27.	4-Methyl, 1,2-Pentanone	10
11.	Chloroform	10	28.	Tetrachloroethylene	10
12.	1,2-Dichloroethane	10	29.	Toluene	10
13.	2-Butanone	10	30.	Chlorobenzene	10
14.	1,1,1-Trichloroethane	10	31.	Ethylbenzene	10
15.	Carbon Tetrachloride	10	32.	Styrene	10
16.	Bromodichloromethane	10	33.	Total Xylenes	10
17.	1,1,2,2-Tetrachloroethane	10			

SECTION 3 - ASP ORGANICS (SEMI-VOLATILES) Method: NYSDEC-ASP-91-2					
SEMI-VOLATILE		CONTRACT-REQUIRED QUANTITATION LIMIT (µg/l)	SEMI-VOLATILE		CONTRACT-REQUIRED QUANTITATION LIMIT (µg/l)
1.	Phenol	10	33.	Acenaphthene	10
2.	Bis(2-chloroethyl)ether	10	34.	2,4-Dinitrophenol	25
3.	2-Chlorophenol	10	35.	4-Nitrophenol	25
4.	1,3-Dichlorobenzene	10	36.	Dibenzofuran	10
5.	1,4-Dichlorobenzene	10	37.	Dinitrotoluene	10
6.	1,2-Dichlorobenzene	10	38.	Diethylphthalate	10
7.	2-Methylphenol	10	39.	4-Chlorophenyl phenyl ether	10
8.	2,2'oxybis(1-Chloropropane)	10	40.	Fluorene	10
9.	4-Methylphenol	10	41.	4-Nitroanile	25
10.	N-Nitroso-dipropylamine	10	42.	4,6-Dinitro-2-methylphenol	25
11.	Hexachloroethane	10	43.	N-nitrosodiphenyl amine	10
12.	Nitrobenzene	10	44.	4-Bromophenyl phenyl ether	10
13.	Isophorone	10	45.	Hexachlorobenzene	10
14.	2-Nitrophenol	10	46.	Pentachlorophenol	25
15.	2,4-Dimethylphenol	10	47.	Phenanthrene	10
16.	Bis(2-Chloroethoxy) methane	10	48.	Anthracene	10
17.	2,4-Dichlorophenol	10	49.	Carbazole	10
18.	1,2,4-Trichlorobenzene	10	50.	Di-n-butyl phthalate	10
19.	Naphthalene	10	51.	Fluoranthene	10
20.	4-Chloroaniline	10	52.	Pyrene	10
21.	Hexachlorobutadiene	10	53.	Butyl benzyl phthalate	10
22.	4-Chloro-3-methylphenol	10	54.	3,3'-Dichloro benzidine	10
23.	2-Methylnaphthalene	10	55.	Benz(a)anthracene	10
24.	Hexachlorocyclopentadiene	10	56.	Chrysene	10
25.	2,4,6-Trichlorophenol	10	57.	Bis(2-ethylhexyl) phthalate	10
26.	2,4,5-Trichlorophenol	25	58.	Di-n-octyl phthalate	10
27.	2-Chloronapthalene	10	59.	Benzo(b)fluoranthene	10
28.	2-Nitroananiline	25	60.	Benzo(k)fluoranthene	10
29.	Dimethyl phthalate	10	61.	Benzo(a)pyrene	10
30.	Acenaphthylene	10	62.	Indeno(1,2,3-cd) pyrene	10
31.	2,6-Dinitrotoluene	10	63.	Dibenz(a,h) anthracene	10
32.	3-Nitroaniline	25	64.	Benzo(g,h,i)perylene	10

SECTION 3 - ASP ORGANICS (PESTICIDES/PCBS) Method: NYSDEC-ASP-91-3			
PESTICIDE/PCB	**CONTRACT-REQUIRED QUANTITATION LIMIT (µg/l)**	**PESTICIDE/PCB**	**CONTRACT-REQUIRED QUANTITATION LIMIT (µg/l)**
1. Alpha-BHC	0.05	15. 4,4'-DDT	0.10
2. Beta-BHC	0.05	16. Methoxychlor	0.5
3. Delta-BHC	0.05	17. Endrin ketone	0.10
4. Gamma-BHC (lindane)	0.05	18. Endrin aldehyde	0.10
5. Heptachlor	0.05	19. Alpha-Chlordane	0.05
6. Aldrin	0.05	20. Gamma-Chlordane	0.05
7. Heptachlor epoxide	0.05	21. Toxaphene	5.0
8. Endosulfan I	0.05	22. AROCHLOR-1016	1.0
9. Dieldrin	0.10	23. AROCHLOR-1221	1.0
10. 4,4'-DDE	0.10	24. AROCHLOR-1232	1.0
11. Endrin	0.10	25. AROCHLOR-1242	1.0
12. Endosulfan II	0.10	26. AROCHLOR-1248	1.0
13. 4,4'-DDD	0.10	27. AROCHLOR-1254	1.0
14. Endosulfan sulfate	0.10	28. AROCHLOR-1260	1.0

*Matrix: groundwater. For soil matrix, multiply CRDL by 100.

**Quantitation limit for medium-level soil is 1,200 µg/kg (wet weight basis).

DRAFT
CONSTRUCTION QUALITY ASSURANCE PLAN

OPERABLE UNIT 1A
and
BROWNFIELD SITE EXPANSION AREA

Concord Hotel and Resort
Brownfield Cleanup Program Site #C353008
Town of Thompson, Sullivan County, New York

Prepared For:

CONCORD ASSOCIATES, LP
115 Stevens Avenue
Valhalla, New York 10595

Prepared By:

SESI CONSULTING ENGINEERS, P.C.
12A Maple Avenue
Pine Brook, NJ 07058

Project No.: N-7180

August 28, 2008

Table of Contents

1.0 INTRODUCTION

Concord Associates, LP entered into a Brownfield Cleanup Agreement (BCA) with the New York State Department of Environmental Conservation (NYSDEC) on May 19, 2005, to investigate and remediate a 14.5±-acre property located in the Town of Thompson, Sullivan County, New York pursuant to the Brownfield Cleanup Program (BCP). The approved BCP Site subject to the existing BCA property consists of five Operable Units (OUs) which include:

- **OU-1A** Main Hotel Area (approx. 2-acres)
- **OU-1B** Gas Station and Disposal Area (approx. 2-acres),
- **OU-1C** International Golf Clubhouse & Maintenance Building Area (approx. 2-acres.),
- **OU-2** Golf Maintenance Building and Adjacent Disposal Area (approx. 5-acres)
- **OU-3** International Golf Course Disposal Area (approx. 3.5-acres)

On July 16, 2008, a supplemental BCP application was submitted to the NYSDEC including additional contamination discovered in an approximately 20.5 acres area adjacent to OU-1A, referred to as the "Brownfield Site Expansion Area" (BSEA).

Included in the July 16, 2008 application was a Remedial Action Work Plan (RAWP) addressing contamination in the BSEA. On August 20, 2008, Concord Associates, LP submitted an Interim Remedial Measure Work Plan (IRMWP) to the NYSDEC to remediate soil contamination in a portion of OU-1A. This Construction Quality Assurance Plan (CQAP) has been prepared to satisfy the requirements of the BSEA RAWP and the OU-1A IRMWP.

1.1 PROJECT SETTING

Located in a rural setting in the Catskill Mountains of New York State, the areas around the former Concord Hotel complex are a mix of low-density commercial, recreational, residential uses and undeveloped land. Monticello, the largest nearby municipality, is approximately five miles south.

The former complex was a grouping of obsolete, abandoned, hotel structures and buildings, situated on a property that ranges in elevation from 1,300 to over 1,500 feet above mean sea level. The ground surface at the Main Hotel Area (OU-1A) and BSEA slopes downward across the complex towards Kiamesha Lake to the west.

The proposed redevelopment plan for the BSEA and OU-1A consists of a hotel and resort complex occupying the entire 22.5± acres, and some of which extends past this area. Approximately 150,000 cubic yards of existing site soil must be excavated to accommodate the proposed building finished floors.

1.2 PROJECT SCOPE

The following is a summary of remedial tasks that will be implemented as part of the OU-1A IRM and BSEA RA.

All existing USTs in the BSEA, and any USTs in proximity to the IRM Area that are prohibitive to construction operations will be removed in accordance with the procedures outlined in Section 5.5, *Underground Storage Tank Closure*, of NYSDEC Draft DER-10 and in accordance with the IRMWP and RAWP.

The site soil has been characterized and delineated. Soil in the IRM Area exceeding the Track 1 Soil Cleanup Objectives (SCOs) where excavation needs to occur will be removed down to bedrock. The remediation of this area will be confirmed by post-excavation sampling of the excavation floors (if feasible) and side walls.

Soil below Track 1 SCOs in the BSEA and IRM Area requiring excavation to achieve the proposed grades will either be backfilled outside of the BCP boundary, placed as controlled, compacted fill in other 'clean' areas, or stockpiled in a separate staging area designated for clean fill to be utilized as needed throughout the site.

Excavated soil will be stockpiled on an impermeable liner in a staging area for either off-site disposal at an appropriate regulated facility or reuse on-site in accordance with the provisions of the pending Beneficial Use Determination (BUD) petition submitted to the NYSDEC on August 14, 2008. Stockpiles will be covered with an anchored, impermeable liner at the end of each workday to prevent migration of contaminants.

1.3 QUALITY PROGRAM OVERVIEW

The purpose of this document is to describe and explain implementation of selected remedial tasks for the site, short-term environmental monitoring activities, and the rationale used to develop these activities for the project. This document also identifies the quality assurance/quality control (QA/QC) steps to be used in construction management, including monitoring actions, reporting mechanisms, and documentation formats. It presents how environmental monitoring will be performed and how modifications to the construction procedures will be directed, as necessary, in response to results of monitoring actions. Further, it defines the QA methods and protocols for project personnel to ensure they have a complete understanding of monitoring, feedback, and adjustment mechanisms.

The three types of compliance monitoring to be conducted include the following:

- **Protection Monitoring** – to confirm that human health and the environment are adequately protected during the construction period of the cleanup action.
- **Performance Monitoring** – to confirm that the cleanup action has attained cleanup standards and other performance standards.
- **Confirmation Monitoring** – to confirm the long-term effectiveness of the cleanup action nonce performance standards have been attained.

This CQAP specifies the following items in the subsequent sections:

- Responsibilities and authorities of key project personnel, Contractors, and all organizations involved in the construction or oversight of the remedial action.
- Necessary personnel, Contractor, and Subcontractor qualifications, including qualifications of independent QA officials who possess the training and experience necessary to fulfill identified responsibilities.
- Inspection activities, including a description of the type and frequency of tests and observations used to monitor the remedial action and verify compliance with environmental requirements, customary construction practices, Occupational Safety and Health Administration (OSHA), building and safety codes, etc.
- Construction monitoring requirements, objectives, and sampling requirements.
- All documentation requirements for reporting construction QA activities, including daily summary reports, inspection data sheets, and filing system organization.
- Procedures for project modifications and change orders, including documentation and reporting requirements.

- Project meetings and conferences.

1.4 CQAP ORGANIZATION

This CQAP is organized into eleven sections.

- **Section 1 - Introduction:** describes the project setting, scope, and CQAP quality program overview.
- **Section 2 - Project QC/QA Organization:** presents the organizations and key personnel involved in the remedial action, their responsibilities and authorities, and the minimum training and experience of the QA program personnel.
- **Section 3 - Submittals:** presents the procedures for processing submittals from contractors and vendors.
- **Section 4 - Inspection and Verification Activities:** provides procedures for tracking construction inspection and verification activities for remediation, and construction acceptance criteria.
- **Section 5 - Construction Deficiencies:** describes the procedures for tracking construction deficiencies from identification through acceptable corrective action.
- **Section 6 - Documentation:** describes the procedures for management of project documents.
- **Section 7 - Final Reporting:** describes the QA/QC documentation for the remedial action that will be presented in the Final Engineering Report (FER).
- **Section 8 - References:** provides references to key project documents referred to in this plan.

2.0 PROJECT QA/QC ORGANIZATION

This section presents the responsibilities and authorities of organizations and key personnel involved in the remedial action, the structure of the QA/QC organization, the minimum training and experience of the QA/QC personnel.

2.1 RESPONSIBILITIES AND AUTHORITIES OF ORGANIZATIONS

The organizations involved in the remedial action and their QA/QC roles and responsibilities are as follows.

2.1.1 New York State Department of Environmental Conservation (NYSDEC)

NYSDEC is the lead agency responsible for observing and monitoring the progress of the remedial actions in accordance with the IRMWP and RAWP and applicable project documents. As such, NYSDEC exercises approval authority for this CQAP.

2.1.2 Concord Associates, LP

Concord Associates, LP is responsible for implementing the Remedial Action (RA) and for ensuring that its contractors and subcontractors perform remedial construction tasks in accordance with the applicable project documents.

The CQAP details the systems Concord Associates have put in place in order to ensure that its responsibilities to quality are met. Concord Associates is responsible for verifying that the CM effectively implements and manages the systems detailed in this plan. Concord Associates is also responsible for formal communications with and submittals to the NYSDEC.

2.1.3 Remedial Engineer

The Remedial Engineer is a duly qualified, licensed design professional, retained by Concord Associates to provide design and engineering services in connection with the project. The Remedial Engineer is responsible for certifying that the remedial action has been constructed in accordance with the project documents in the Final engineering Report (FER).

2.1.4 Construction Manager

The CM is a duly qualified entity retained by Concord Associates to provide professional construction management and related services in connection with the project. The CM is responsible for implementation of this CQAP. The CM will manage construction contractors on behalf of Concord Associates and serve as the primary point of contact with the contractors for all communications to and from the contractors. The CM will provide Quality Assurance and monitor the day-by-day construction quality control activities performed by construction contractors to verify compliance with the contract plans and specifications. The CM will also manage, coordinate, and administer all QA/QC activities and requirements, including those of subcontractors to the CM.

2.1.5 Construction Contractors

The construction contractors are retained by Concord Associates to provide the labor, materials and equipment required to construct the project in accordance with the project documents. Construction contractors are responsible for the quality control of their constructed work product as well as the necessary inspections and tests required to ensure that their work complies with the contract documents. They exercise authority over their workforce, including QC personnel and their third-party QC support services.

Each contractor is responsible for developing a QC organization plan including all QC personnel and how these personnel integrate with other management, production and construction functions and personnel subject to acceptance by the CM. The contractors' plans shall provide a QC organization that is represented on the site at all times during progress of the work and with authority to take any action necessary to ensure compliance with the project documents.

2.2 STRUCTURE OF QA/QC ORGANIZATION

The QA and QC functions of the project organizations are functionally integrated, and the structure of the project QA/QC team is outlined in Figure 1.

2.3 RESPONSIBILITIES AND AUTHORITIES OF KEY PERSONNEL

Key personnel involved in remedial construction and their QA/QC roles and responsibilities are described below in Section 2.3.1 and Section 2.3.2 below. Since personnel assignments are subject to change over time, the CM will manage CQAP staffing assignments including each person's role and organization. When personnel changes occur, the CM will provide updates to Concord Associates as required.

2.3.1 Construction Manager's Quality Assurance Personnel

Construction Manager

The Construction Manager (CM) is the primary point of contact for Concord Associates on all construction management issues. The CM is responsible for the overall management of activities related to the construction program, including the implementation of the CQAP and the health and safety program. As such, the CM will work directly with Concord Associates to exercise approval authority over contractor submittals.

Site Manager
The Site Manager (SM) monitors and works with Concord Associates to approve each contractor's quality, and progress submittals to ensure that the project is meeting the contract requirements. The SM will manage the field implementation of the CQAP at the project site under control of the field engineer (FE) and the Construction QA Officer.

Construction Quality Assurance Officer
The CQAO is a full-time employee of the CM. The CQAO should have a minimum of five years of experience in related construction and prior QA experience on a project of comparable size and scope to this project.

The CQAO reports directly to the CM. The CQAO will have full authority delegated by the CM and Concord Associates to institute actions necessary for the successful implementation of the QA/QC program to ensure compliance with the project plans and technical specifications (including stop-work authority).

The CQAO coordinates activities with the SM to ensure that the FE, inspection staff, third party inspection and testing firms as well as contractor QC staff carry out the requirements of the CQAP. The CQAO tracks and reports non-conformances to the CM, SM, and after notification to the CM, to contractor management and contractor QC staff. Other CQAO responsibilities include:

- Reviewing contractor QC reports, tests, and inspection results;
- Facilitating the implementation of the four-phase inspection program and participating in the required inspections; and
- Ensuring that QA personnel conducting inspections are adequately trained and understand assignment limits and time frames.

Field Engineer
The Field Engineer (FE) oversees inspection efforts, provides technical advice, and coordinates support from the Remedial Engineer, administration, inspection services, safety, and other team members.

The FE coordinates resolution of unsatisfactory work items with contractors through final acceptance. The FE assures open noncompliance report (NCR) items are completed and accepted in a timely fashion.

The FE reviews QC and QA testing documentation with contractors, engineers, and inspectors. The FE also reviews plans and specifications for assigned projects and estimates the type and number of QA tests that should be accomplished for each specification section. The FE meets with third-party testing and inspection firms to review test requirements and coordinate testing and inspection services.

Field Inspectors

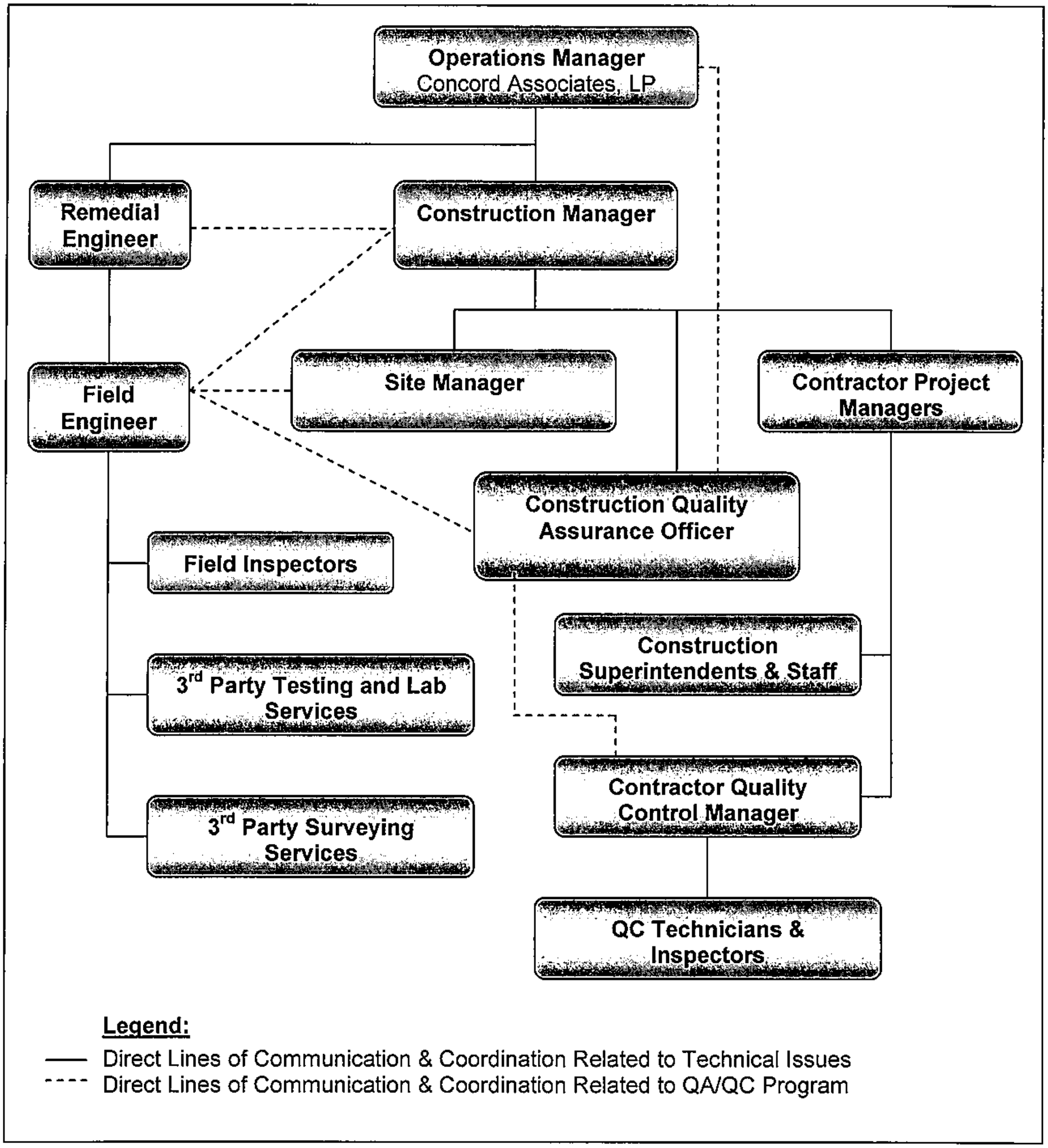
Field Inspectors (FIs) are responsible to the FE and support the FE's administration of the project design documents. The FIs will hold a bachelors degree in engineering or construction and/or have three years experience in the type of work being performed on this project. Additional experience and training may be substituted for educational requirements, subject to Concord Associate approval.

The FIs will monitor the day-to-day activities of the contractor. This includes ensuring that contractors comply with the plans and specifications, applicable building codes, good workmanship, and the QC requirements of the contract. As part of this effort, FIs will:

- conduct independent inspections to verify the quality of the work;
- participate in contractor inspections;
- review test and inspection reports; and
- ensure that the required documentation is submitted.

The FIs must be alert to detecting, recording, and reporting any deviation from the project design documents, including calling any deficient item to the attention of the FE, the contractor's superintendent, and/or other representative. The FIs must keep accurate and detailed records of the contractor's performance and progress, delivery of materials, and other pertinent matters, including the daily inspection report.

Figure 1 – Construction QA/QC Organization



3.0 SUBMITTALS

This section describes the procedures for CM processing of submittals from contractors. The CM will administer and control the processing of contractor submittals. After being reviewed for completeness, submittal documents will be transmitted to the relevant project staff for review and verification for compliance with contract requirements. The submittal's disposition will be noted on the submittal, which will be signed, dated and returned to the contractor. If required, the contractor will revise the submittal, incorporating the comments and will resubmit it for review and verification for compliance. Submittals will be logged and copies will be retained in the project files.

3.1 PROCESS, REVIEW AND ACCEPTANCE

Submittals will be managed as follows:

1. Contractors will number and certify the completeness of all submittals before submitting to the CM;
2. The original submittal transmittal and all copied attachments will be logged into the document tracking system. The CM will then forward submittals to the appropriate reviewers.
3. After reviewing the submittal, the Remedial Engineer (or other designated reviewer) makes the appropriate notations and action taken on the submitted documents and returns the submittal to the CM.
4. The six actions that may be taken for each submittal are:
    - Approved – Submittal meets contract requirements. No additional copies will be required of the contractor.
    - Approved As Noted – Submittal meets contract requirements with minor corrections noted. Re-submittal is not required. Contractor must incorporate the required corrections into the work in the field. No additional copies will be required of the contractor.
    - Revise and Resubmit – Submittal has some selected areas that do not meet requirements. These areas can be revised to meet requirements, and the entire submittal must be re-submitted for review and approval. No work will begin in the field until the revised submittal has been approved.
    - Rejected – Submittal is inadequate and does not meet design requirements. Revise the complete submittal and resubmit for approval. No work will begin in the field until the revised submittal has been approved.
    - For Information Only – Submitted for information only; no response action required
    - Received, No Action Taken – Receipt of submittal is noted; no further action required.

5. When a submittal is to be revised and resubmitted, the contractor will revise the submittal and indicate this revision by incrementing the revision number. The contractor's submittal process will then be repeated.

4.0 INSPECTION AND VERIFICATION ACTIVITIES

The contractor shall develop QC control, verification, and acceptance testing plans that cover the type, test standard, frequency, control requirements, and assigned responsibility for inspections and tests. The CM will review and approve these plans. Ongoing QA monitoring and oversight of contractor QC inspections and testing will be performed by the CM.

4.1 CONSTRUCTION INSPECTION AND VERIFICATION REQUIREMENTS

QA inspection and testing will be used to verify the adequacy and effectiveness of the contractor QC program. The QA inspection and testing frequency will be at the discretion of the CQAO based on results of QC tests, evaluation of daily reports, audits of the QC program and verification testing conducted by the CM and owner's third party testing firm. Should information become available that indicates a potential problem, the CQAO will review in detail all pertinent information and order additional verification testing if necessary.

Materials qualification testing will be done prior to construction to verify that the materials comply with requirements of the project documents. The contractor will obtain representative samples of the materials designated as the proposed source of the materials. Test samples will be sent by the contractor to the Testing Laboratory. The Testing Laboratory will report all test results for determination of material meeting the acceptance criteria.

The CQAO or designee will periodically inspect material being used. If determined that the characteristics of the material being used differ from the material initially tested, the CQAO designees will direct the contractor to repeat the qualification testing.

Table 1 – Control, Verification and Acceptance Testing Plan

Specifications		Quality Control		Testing Frequency	Responsibility		Control Requirements
Item	Item Description	Test Type	Test Standard		Contractor (QC)	CM/FE (QA)	
1	Excavation Limits	Surveying	N/A	As determined necessary by FI in order to delineate horiz. & Vert. limit of excavation			Site Monument (min. of 3)
2	Soil Post-Excavation Sampling	Chemical Analyses		As per RAWP and IRMWP			
3	UST Removal Post-Excavation Sampling	Chemical Analyses		As per DER-10 Section 5.5			
4	Unrestricted Use Backfill Material	Chemical Analyses		As per RAWP and IRMWP			
5	Restricted Use Backfill Material	Chemical Analyses		Not required; delineation complete			
6	C&D Backfill Material	Chemical Analyses		As per BUD request			
7	Backfilling, Compaction, & Density Control	Nuclear Densometer Field Testing; Modified Proctor Lab Testing	ASTM D 2922 ASTM D 5195 ASTM D 1557				
8	Select Fill Evaluation	Grain Size Distribution	ASTM D 422 or C 136	1 per stockpile and source change	Contractor's testing laboratory	7-10% verification test	N/A

Note: Testing Plan may be modified as needed during construction activities.

4.1.1 Inspections

The contractor shall establish a program for inspection of activities affecting quality and shall cover all construction site and laboratory operations, including both on-site and off-site operations. Inspections shall be performed to verify compliance with documented instructions, drawings, procedures, and specifications as required by the remedial design. All inspections shall be documented by the contractor.

A four-phase inspection program shall be followed for each definable feature of the work. The four phases of inspection are:

1. **Preparatory Inspection -** The contractor and the CM perform preparatory inspections prior to beginning applicable construction tasks.
    - Ensure that all materials and /or equipment have been tested, submitted, and approved.

- Ensure that provisions have been made to provide required testing.
- Examine work area to ensure all preliminary work has been completed.
- Examine materials, equipment, and samples to ensure that they conform to applicable, approved shop drawings or submittal data
- Ensure all required materials and/or equipment are on hand, and that all monitoring and measuring equipment is properly calibrated and in proper working condition.
- Record preparatory inspections in the contractor's QC documentation.

2. **Initial Inspection** - The contractor and the CM perform an initial inspection when a representative portion of the particular feature of work has been completed.
    - Examine the quality of workmanship.
    - Review control testing for compliance with design requirements.
    - Record initial inspections in the contractor's QC documentation.

3. **Follow-Up Inspection** - The contractor and the CM perform follow-up inspections as required.
    - Ensure continuing compliance with project document requirements.
    - Ensure continuing compliance with control testing until completion of particular feature of work.
    - Contractor records follow-up inspection in daily QC reports.
    - The CM inspection staff records follow-up inspections in their daily inspection report.
    - Conduct final follow-up inspections and correct test deficiencies prior to the addition of new features of work.

4. **Completion Inspection** - The contractor and CM perform a completion inspection of the work.
    - Develop a "punch list" of items that do not conform to the approved plans and specifications.
    - Include the punch list in the construction QC documentation.
    - Perform a second completion inspection after punch list items have been completed and the CM has been notified by the contractor.

The daily inspection reports shall identify inspections conducted, results of inspections, location and nature of defects found, causes for rejection, and remedial or corrective action taken or proposed.

Additional QA inspections may include inspection of third-party lab testing facilities, fabrication facilities, and suppliers. Other inspections outside of the four-phase program described above may be ordered or performed by the CM to verify compliance with applicable New York State regulations.

When deficiencies are discovered during the inspection processes, focused inspection shall be considered by the CQAO. When material, performed work, or installation is found on the basis of focused inspections to be deficient and/or does not meet the project specifications, the CQAO will assure deficiency correction is implemented.

4.1.2 QC Testing

The contractor shall establish a test program to ensure that all required testing is properly identified, planned, documented and performed under controlled and suitable environmental conditions, including cleanliness. The contractor shall be responsible for establishing a system of daily test reports that will record all QC test results.

4.1.3 QA Testing

The CQAO will be responsible for the QA materials sampling and testing program. QA testing is provided for the verification of the adequacy and effectiveness of the contractor's QC testing. QA testing is performed by the CQAO and is independent of and in addition to QC testing performed by contractors. QA testing may be performed on a pre-established schedule or as directed by the CQAO.

QA testing will be performed by or under supervision of the QA staff to validate the contractor's QC sampling and testing. The need for QA testing shall be based on the following considerations:

- Importance of the item as to its reliability, etc;
- Need to perform quality checks for fabrication sequences not available for inspection at completion; and
- Deficiencies are discovered.

QA testing shall be performed in accordance with the following:

- The CQAO shall develop a quality test and inspection schedule using the construction activity forecast as a guide. The schedule shall:
  - Identify the QA test activities.
  - Identify the hold points
- The quality test schedule shall be distributed to the CM and CM field staff.
- The contractor shall be provided a one-day advance notice of impending hold points.

Field Inspectors conducting the quality tests and inspections shall complete the Daily Construction Report. The Daily Construction Report shall be distributed to the CQAO, FE, CM Site Manager, Concord Associates managers, and/or contractor PM as applicable. The CQAO will review QA tests and maintain files for all field QA documentation.

4.2 CONSTRUCTION ACCEPTANCE CRITERIA

Construction acceptance criteria for materials qualifications, inspection, and testing are established by design specifications, project documents, and/or New York State Standards, Criteria, and Guidance (SCGs). Criteria for materials and equipment shall set by the Engineer of Record in accordance with the applicable codes and standards, and by manufacturers' recommendations. Contractor submittals are to document conformance with applicable acceptance criteria.

4.3 COMPLIANCE WITH HANDLING, STORAGE, PACKAGING, PRESERVATION, AND DELIVERY REQUIREMENTS

CM field staff will inspect the construction contractor's activities to ensure technical compliance in identification, handling, storage, packaging, preservation, and delivery of materials, parts, assemblies, and end products.

5.0 CONSTRUCTION DEFICIENCIES

This section provides procedures for tracking construction deficiencies (noncompliance) from identification through acceptable corrective action. It defines the controls and related responsibilities and authorities for dealing with noncompliant products or services.

5.1 DEFICIENCY IDENTIFICATION

Deficiency occurs when a material, performed work, or installation does not meet the plans and/or specifications for the project.

5.2 CONTRACTOR QC DEFICIENCY IDENTIFICATION AND CONTROL

When material, performed work, or installation is found deficient, the CQAO (or designee) shall ensure that the non-conforming material, work, or installation is identified and controlled to prevent unintended use or delivery. The CM will notify the contractor of any noncompliance with any of the foregoing requirements. The contractor shall, after receipt of such notice, immediately take corrective action.

Minor deficiencies noted during test or inspection are verbally reported to the contractor's representative and noted on the Daily Construction Report. Minor deficiencies are items that do not require significant rework or repair work to correct, and will not result in significant deviations from required quality standard if corrected immediately.

Control and disposition of such deficiencies shall be by the originator of the Daily Construction Report and the contractor's supervisor responsible for the work and do not require formal action by the CM. Minor deficiencies should be able to be corrected on the spot by agreement with the contractor's supervisor.

Non-conformances are major deviations from the contract requirement and/or accepted standard of quality, which must be formally documented for corrective action by CM field staff or the third party testing group. Failure by a contractor to correct a **minor deficiency** after having been put on notice will also result in a **non-conformance** if it is not corrected. Nonconformances shall be formally documented. A log shall be maintained for all NCRs. The NCR shall be distributed, as applicable, to the contractor, Concord Associates, CM, SM and CQAO. The CQAO shall follow up on the NCR as required to verify that corrective action has been completed. The FE shall verify and accept the corrected work by actual inspection.

5.3 NON-CONFORMANCE REPORT

The NCR is a formal notification to the contractor that work does not meet the plans or the specifications for the project. Any item of work found to be deficient will be identified by the FIs on the nonconformance report as described in this section. Non-conformance reports will be included on the non-conformance log and tracked through verification that the non-conformance has been corrected.

5.4 CONTRACTOR QC DEFICIENCY CORRECTION

When material, performed work or installation is found to be deficient and/or does not meet the project specifications, the CQAO will assure deficiency correction is implemented. The CQAO designee shall ensure that the non-conforming material, work or installation is identified and controlled to prevent unintended use or delivery. The CQAO is responsible for documenting the non-conformance in a NCR.

The construction contractor will implement corrective actions to remedy work that is not in accordance with the drawings and specifications. The corrective actions will include removal and replacement of deficient work using methods approved by the FE or CM. Removal must be done in a manner that does not disturb work that meets QA/QC criteria; otherwise, the disturbed material must also be removed and replaced. Replacement will be subjected to the same scope of QA/QC inspection and testing as the original work. If the replacement work is not in accordance with the project documents, the replacement work will be removed, replaced, reinspected, and re-tested.

6.0 DOCUMENTATION

Contractor's QC documentation must cover all aspects of QC program activities, and includes Daily Inspection Reports and Daily Test Reports. Ongoing QA oversight will be documented by the CM.

6.1 DAILY RECORD KEEPING

Sufficient records shall be prepared and maintained as work is performed to furnish documentary evidence of the quality of construction and laboratory analysis and of activities affecting quality. Each contractor shall maintain a daily log of all inspections performed for both contractor and subcontractor operations on a form acceptable to the

CM. The CM shall be provided at least one copy of each daily inspection and test report on the work day following the inspection/test.

6.2 DAILY CONSTRUCTION REPORT

A single daily construction report will be prepared and signed by each FI, and submitted to the FE. Copies will be provided to the CM and Remedial Engineer on a weekly basis. The report will include a summary of the contractor's daily construction activities. Supporting inspection data sheets will be attached to the daily report where needed.

At a minimum, the daily construction report will include the following information:

- Date, project name, location, and other identification
- Description of weather conditions, including temperature, cloud cover, and precipitation
- Reports on any meetings held and their results
- Record of visitors to site
- Locations of construction underway during that day
- Equipment and personnel working in each activity, including subcontractors
- Descriptions of work being inspected
- Decisions made regarding approval of units of material or of work, and corrective actions to be taken
- Description of problems or delays and resolution
- Communications with contractor staff
- Construction activities completed and/or in progress
- Progress photos, where applicable
- Signature of the report preparer

The daily construction reports will be routed on a daily basis to the project QA/QC files and will be maintained as part of the permanent project record.

6.3 CONTROL OF QUALITY RECORDS

The CQAO verifies QA record accuracy and maintains copies of all quality-related documentation. This includes, but may not be limited to:

- Daily construction QA logs and records;
- Inspection checklists and reports;
- Surveillance reports;

- Non-conformance reports;
- Material receiving reports; and
- Monitoring and test data.

These records will be stored in files maintained in the project document control files. All original documents pertaining to project information will be maintained in the project file located at the project office at the site. All records shall be available for inspection and audit, at any time, by the CM and Concord Associates.

7.0 FINAL REPORTING

The following quality related documents will be submitted, as applicable, to the NYSDEC as part of the FER:

- Record (as-built) drawings;
- Site Management Plan;
- Operation and Maintenance (O&M) manuals;
- Results of the Start-up and Testing Plan and the Commissioning Plan implemented for each major piece of equipment or system before system turnover; and
- Project certification by the Remedial Engineer.

8.0 REFERENCES

SESI Consulting Engineers. 2008a. *Draft Interim Remedial Measure Work Plan for Operable Unit 1A.* August 20, 2008.

SESI Consulting Engineers. 2008b. *Draft Remedial Action Work Plan, Brownfield Site Expansion Area.* July 14, 2008.

ATTACHMENT 1 - CQAP STAFFING LIST AND RESUMES

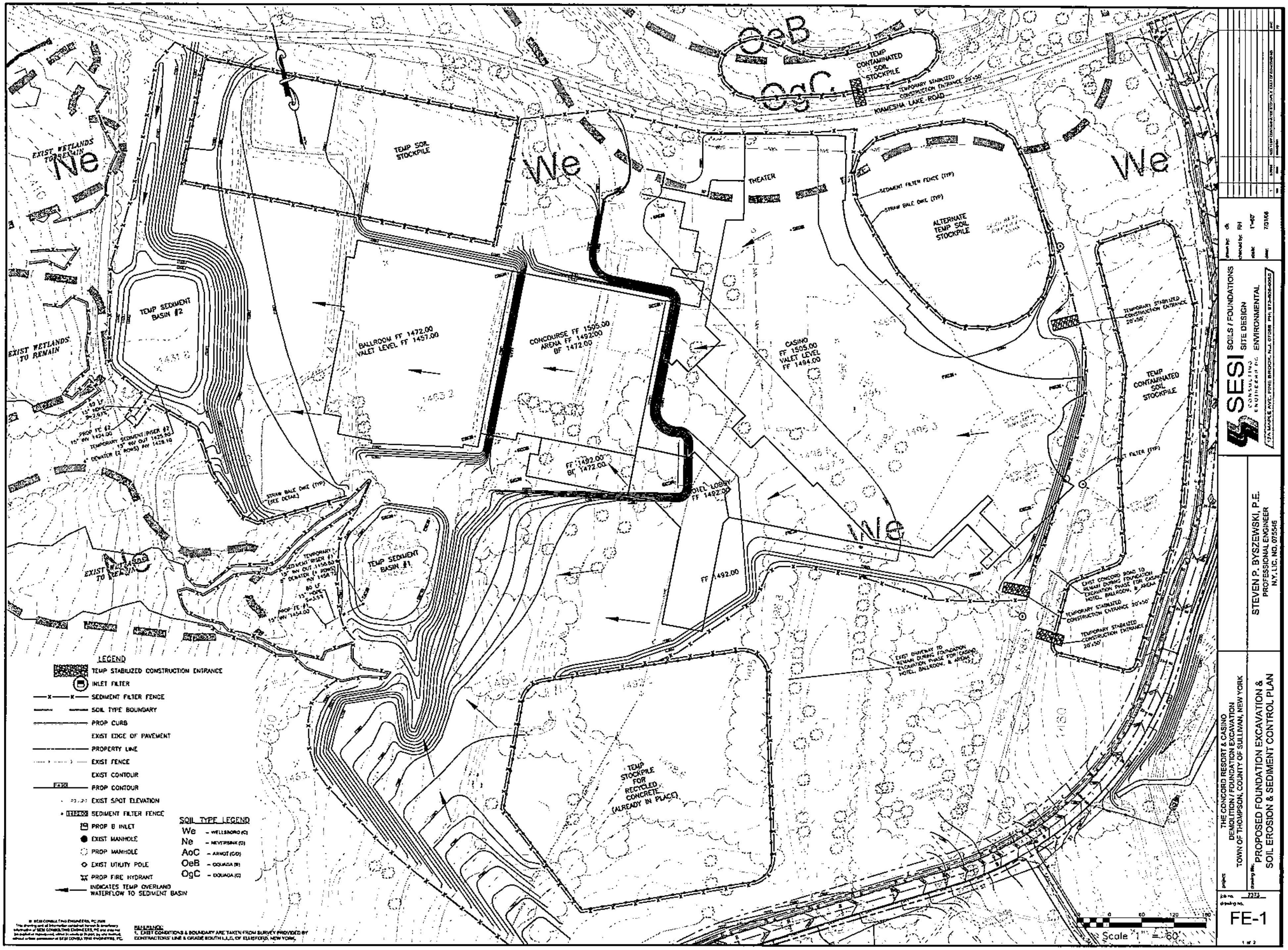
APPENDIX A - SAMPLE QUALIFICATION TEST SCHEDULES
Example Qualification Test Schedule - Onsite Borrow Materials

APPENDIX B - SAMPLE INSPECTION SCHEDULES
Example Inspection Schedule - Onsite Borrow Materials

Example Inspection Schedule - Aggregate Placement

APPENDIX C - SAMPLE TEST SCHEDULES
Example Testing Schedule - Onsite Borrow Material Placement

APPENDIX D - TYPICAL CONSTRUCTION FORMS
D-1 Daily Construction Report
D-2 Quality Inspection Report
D-3 Inspection Notification Form
D-4 Non-conformance Report
D-5 Non-conformance Report Log
D-6 Contractor Non-Conformance Letter (Sample)



TEMP SOIL STOCKPILE
TEMP SEDIMENT BASIN #2
BALLROOM FF 1472.00 VALET LEVEL FF 1457.00
CONCOURSE FF 1505.00 ARENA FF 1492.00 BF 1472.00
CASINO FF 1505.00 VALET LEVEL FF 1494.00
THEATER
ALTERNATE TEMP SOIL STOCKPILE
SEDIMENT FILTER FENCE (TYP)
STRAW BALE DIKE (TYP)
TEMP CONTAMINATED SOIL STOCKPILE
TEMPORARY STABILIZED CONSTRUCTION ENTRANCE 20'x50'
KIAMESHA LAKE ROAD
FF 1492.00 BF 1472.00
HOTEL LOBBY FF 1492.00
FF 1492.00
TEMP SEDIMENT BASIN #1
TEMP STOCKPILE FOR RECYCLED CONCRETE (ALREADY IN PLACE)
EXIST CONCORD ROAD TO REMAIN DURING FOUNDATION EXCAVATION PHASE FOR CASINO HOTEL, BALLROOM, & ARENA
EXIST DRIVEWAY TO REMAIN DURING FOUNDATION EXCAVATION PHASE FOR CASINO HOTEL, BALLROOM, & ARENA
FILTER (TYP)
EXIST WETLANDS TO REMAIN
STRAW BALE DIKE (TYP) (SEE DETAIL)
We
Ne
OeB
OgC
LEGEND
TEMP STABILIZED CONSTRUCTION ENTRANCE
INLET FILTER
SEDIMENT FILTER FENCE
SOIL TYPE BOUNDARY
PROP CURB
EXIST EDGE OF PAVEMENT
PROPERTY LINE
EXIST FENCE
EXIST CONTOUR
PROP CONTOUR
EXIST SPOT ELEVATION
SEDIMENT FILTER FENCE
PROP B INLET
EXIST MANHOLE
PROP MANHOLE
EXIST UTILITY POLE
PROP FIRE HYDRANT
INDICATES TEMP OVERLAND WATERFLOW TO SEDIMENT BASIN
SOIL TYPE LEGEND
We - WELLSBORO (C)
Ne - NEVERSINK (D)
AoC - ARNOT (C/D)
OeB - OQUAGA (B)
OgC - OQUAGA (C)
REFERENCE:
1. EXIST CONDITIONS & BOUNDARY ARE TAKEN FROM SURVEY PROVIDED BY CONTRACTORS' LINE & GRADE SOUTH L.L.C. OF ELMSFORD, NEW YORK.
Scale 1" = 60'
SESI SOILS / FOUNDATIONS SITE DESIGN ENVIRONMENTAL
12A MAPLE AVE, PINE BROOK, N.J. 07058
STEVEN P. BYSZEWSKI, P.E.
PROFESSIONAL ENGINEER
N.Y. LIC. NO. 075546
THE CONCORD RESORT & CASINO
DEMOLITION / FOUNDATION EXCAVATION
TOWN OF THOMPSON, COUNTY OF SULLIVAN, NEW YORK
PROPOSED FOUNDATION EXCAVATION & SOIL EROSION & SEDIMENT CONTROL PLAN
scale 1"=60'
date 7/31/08
job no. 7373
FE-1
1 of 2

MICHAEL W. ST. PIERRE, P.E.
Project Engineer

Education

B.S. Civil Engineering; New Jersey Institute of Technology, Newark, New Jersey

Professional

Professional Engineer - State of New Jersey
Professional Engineer - State of New York
Professional Engineer - State of Pennsylvania
Member of the American Society of Civil Engineers

Background and Experience

Michael joined SESI on a part-time basis in 1987 and became a full-time employee after graduating from NJIT in 1991. He has been involved in civil engineering site plan design for residential subdivisions, office buildings, shopping centers and warehouses. The design work includes grading, drainage, stream encroachment, utilities, parking areas, roadways and retaining wall designs.

Michael has been involved in designing, managing and inspecting field work for all phases of sitework and foundation construction including dynamic compaction, piles, shallow foundations, compacted fills, environmental sampling, monitoring of settlement points and surveying. He has also been involved in numerous surface and subsurface soil and ground water investigations and prepared geotechnical reports that provide recommendations for site preparation procedures, foundation design criteria and pavement design.

In recent years, he has designed and inspected numerous dynamic compaction projects involving industrial landfills and miscellaneous uncontrolled fills. Michael's expertise is not limited to soft soils. He has been instrumental in numerous projects involving slope failures, underpinning techniques, deep compacted fills using available non-select materials, artificial inducement of settlement using surcharge preloads, and all other aspects of geotechnical engineering

STEVEN P. BYSZEWSKI, P.E., P.P.
Principal

Education

B.S. Civil and Environmental Engineering; Clarkson University, Potsdam, New York

Professional

Professional Engineer - State of New Jersey
Professional Engineer - State of Connecticut
Professional Engineer - State of Pennsylvania
Professional Engineer - State of New York
Professional Engineer - State of Maryland
Professional Planner - State of New Jersey
Member American Society of Civil Engineers
Member New Jersey Society of Professional Engineers
Member Illuminating Engineering Society of North America

Background and Experience

His background in site planning and development and his experience in soils investigations, site evaluations, and environmental assessments enable Steve to bring to both residential and commercial land development projects a creative, workable approach to site planning. He is particularly skilled in providing innovative solutions to site-specific concerns (e.g., parking, hydrology) that maximize the potential of each site without sacrificing ecological principles.

While with SESI, Steve has managed a variety of projects, developing complete site design packages for shopping centers (Cross County Square Mall, Yonkers, NY; Somerville Square, N.J.; Ledgewood Circle Shopping Center, N.J.: Bergenfield and Ramsey Pathmarks, N.J.), office buildings (Bellemead office buildings in Lyndhurst, N.J.; Campus Plaza Medical Arts Building in Randolph, NJ; The Concord Hotel/Convention Center in Sullivan County, NY and residential projects (D.R. Horton, The Grande At Riverdale, a 558-unit condominium project, Riverwalk At Riverdale, NJ, A 424-unit Condo/Age-Restricted community). Additionally, Steve has performed a number of Phase 1 Environmental Site Assessments, in accordance with ASTM Standard Practice, while keeping abreast of current practice and trends through continuing education and seminars.

Integrated within these and other projects are initial site feasibility studies, construction inspection, and the installation, monitoring, and interpretation of geotechnical instrumentation. His work embraces initial client contact and proposal preparation, as well as follow-through with related field work, design, and report presentations. Steve is Principal in charge of the Land Development Division. This entails management of the division's professional and support staff and all division projects. In his capacity of principal in charge, he attends client meetings and offers professional testimony at public hearings, arbitration hearings and court cases.

Table #8 - Remedial Action Schedule

Operable Unit 1A, Concord Hotel and Resort

NYSDEC BCP Site No. C353008

ID	Task Name	Duration
1	**NYSDEC Approval of RAWP**	**0 days**
2		
3	**General**	**4 days**
4	Site Survey/Stakeout	1 day
5	Demo/Site Clearing	3 days
6		
7	**UST Removal**	**13 days**
8	Excavation/Tank Decontamination	5 days
9	Post-Excavation Sample Collection	5 days
10	Laboratory Analysis of Post-Ex Samples	5 days
11	Survey Excavation Boundaries	1 day
12	Backfill Excavation	2 days
13		
14	**Soil Excavation - Building Footprint**	**14 days**
15	Soil Removal/Stockpiling	5 days
16	Post-Excavation Sample Collection	5 days
17	Laboratory Analysis of Post-Ex Samples	5 days
18	Survey Excavation Boundaries	1 day
19	Backfill Excavation	3 days
20		
21	**Analysis of Backfill Material**	**17 days**
22	Soil sample collection	2 days
23	Laboratory Analysis	15 days
24		
25	**Site Capping**	15 days
26		
27	**Install Additional Monitoring Wells (If needed)**	10 days
28		
29	**Final Engineering Report (FER)**	15 days
30		
31	**Record Easement**	5 days
32		
33	**Site Management Plan (SMP)**	**15 days**
34	Plan Preparation	15 days
35	Submittal to NYSDED	0 days

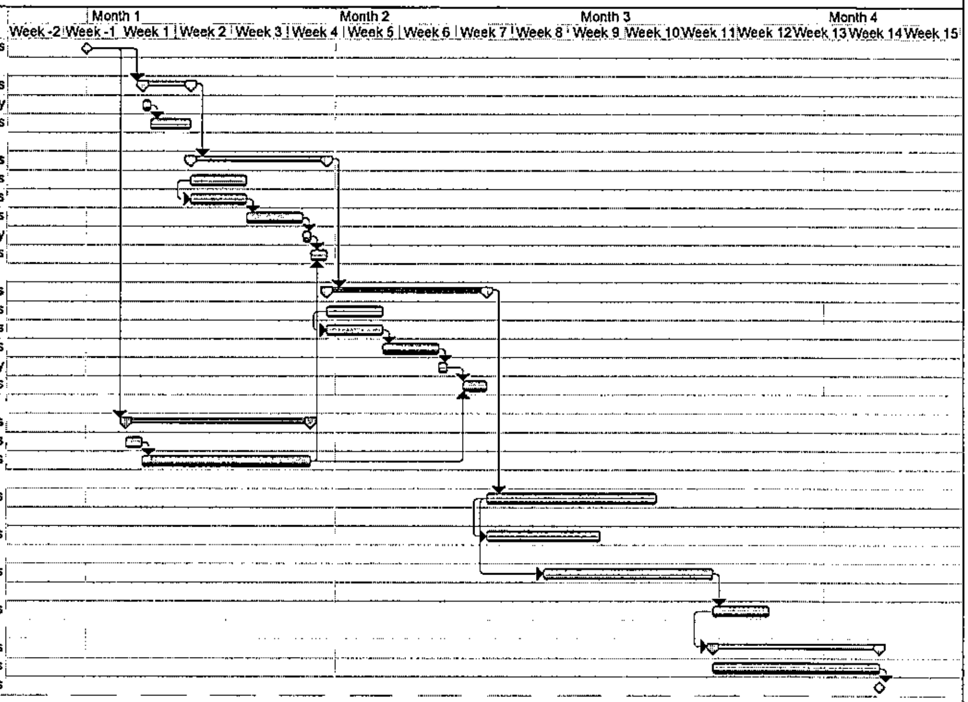


Table #8

Task		Milestone	◇	External Tasks	
Split		Summary		External Milestone	◇
Progress		Project Summary		Deadline	⇩

SESI Consulting Engineers
Project No. 7180

TABLE 5 - SOIL VAPOR DATA
CONCORD HOTEL AND RESORT
TOWN OF THOMPSON, NEW YORK
NYSDEC BCP No. C353008
SESI CONSULTING ENGINEERS PROJECT # 7180

Sample No.	CASRN#	NYSDOH Air Guideline Values	VWOU1-16	
Laboratory ID.#			08100191-02	
Date Collected			10/6/2008	
Concentration		ug/m3	ug/m3	ppbv
GC/MS Volatiles				
1,1,1-Trichloroethane	71-55-6	NA	16	89
Acetone	67-64-1	NA	13000	31000
Isopropyl Alcohol	67-63-0	NA	210	530
Methyl ethyl ketone	78-93-3	NA	9000	27000
Toluene	108-88-3	NA	850	3300
Trichlorofluoromethane	75-69-4	NA	1200	6900
TOTAL TARGETED GC/MS Volatiles				

Notes: All the remaining analytes were not detected above the laboratory reporting limits

Legend:
NA - Not Available/Applicable

TABLE 6 - CLEANUP OBJECTIVES - SESI
CONCORD HOTEL AND RESORT
TOWN OF THOMPSON, SULLIVAN COUNTY, NEW YORK
NYSDEC BCP No. C353008
SESI CONSULTING ENGINEERS # 7180

SOIL

Group	Analyte	CAS #	More Stringent of Commercial/Protection of Groundwater Soil Cleanup Objective (mg/Kg)
METALS	Aluminum	7429-90-5	SB*
	Antimony	7440-36-0	SB*
	Arsenic	7440-38-2	16
	Barium	7440-39-3	400
	Beryllium	7440-41-7	47^
	Cadmium	7440-43-9	7.5^
	Calcium	7440-70-2	SB*
	trivalent Chromium	7440-47-3	1500
	hexavalent Chromium	18540-29-9	19^
	Cobalt	7440-48-4	30 or SB*
	Copper	7440-50-8	270
	Iron	7439-89-6	2000 or SB*
	Lead	7439-92-1	450^
	Magnesium	7439-95-4	SB*
	Manganese	7439-96-5	2000^
	Mercury	7439-97-6	0.73^
	Nickel	7440-02-0	130^
	Potassium	9/7/7440	SB*
	Selenium	7782-49-2	4^
	Silver	7440-22-4	8.3^
	Sodium	7440-23-5	SB*
	Thallium	7440-28-0	SB*
	Vanadium	7440-62-2	150 or SB*
	Zinc	7440-66-6	2480^
SVCOs	1-Chloropropane	540-54-5	-
	1,2,4-Trichlorobenzene	120-82-1	3.4*
	2,4,5-Trichlorophenol	95-95-4	0.1*
	2,4,6-Trichlorophenol	88-06-2	-
	2,4-Dichlorophenol	120-83-2	0.4*
	2,4-Dimethylphenol	105-67-9	-
	2,4-Dinitrophenol	51-28-5	0.200 (M)*
	2,4-Dinitrotoluene	121-14-2	-
	2,6-Dinitrotoluene	606-20-2	1*
	2-Chloronaphthalene	91-58-7	-
	2-Chlorophenol	95-57-8	0.8*
	2-Methylnaphthalene	91-57-6	36.4*
	2-Methylphenol	95-48-7	0.33^
	2-Nitroaniline	88-74-4	0.430 (M)*
	2-Nitrophenol	88-75-5	0.330 (M)*
	3&4-Methylphenol	106-44-5	0.33^
	3,3'-Dichlorobenzidine	91-94-1	-
	3-Nitroaniline	99-09-2	0.500 (M)*
	4,6-Dinitro-2-methylphenol	534-52-1	-
	4-Bromophenyl-phenylether	101-55-3	-

TABLE 6 - CLEANUP OBJECTIVES - SESI
CONCORD HOTEL AND RESORT
TOWN OF THOMPSON, SULLIVAN COUNTY, NEW YORK
NYSDEC BCP No. C353008
SESI CONSULTING ENGINEERS # 7180

SOIL			
Group	Analyte	CAS #	More Stringent of Commercial/Protection of Groundwater Soil Cleanup Objective (mg/Kg)
SVCOs	4-Chloro-3-methylphenol	59-50-7	0.240 (M)*
	4-Chloroaniline	106-47-8	0.220 (M)*
	4-Chlorophenyl-phenylether	7005-72-3	-
	4-Nitroaniline	100-01-6	-
	4-Nitrophenol	100-02-7	0.100 (M)*
	Acenaphthene	83-32-9	98^
	Acenaphthylene	208-96-8	107^
	Aniline	62-53-3	0.1*
	Anthracene	120-12-7	500
	Benzo[a]Anthracene	56-55-3	1^
	Benzo[a]Pyrene	50-32-8	1
	Benzo[b]Fluoranthene	205-99-2	1.7^
	Benzo[g,h,i]Perylene	191-24-2	500
	Benzo[k]Fluoranthene	207-08-9	1.7^
	Benzoic acid	65-85-0	2.7*
	bis(2-Chloroethoxy)methane	111-91-1	-
	bis(2-Chloroethyl)ether	111-44-4	-
	bis(2-Ethylhexyl)phthalate	117-81-7	50*
	Butylbenzylphthalate	85-68-7	50*
	Carbazole	86-74-8	-
	Caprolactam	105-60-2	-
	Chrysene	218-01-9	1^
	Dibenzo[a,h]Anthracene	53-70-3	0.56
	Dibenzofuran	132-64-9	210^
	Diethylphthalate	84-66-2	7.1*
	Dimethylphthalate	131-11-3	2*
	Di-n-Butylphthalate	84-74-2	8.1*
	Di-n-octylphthalate	117-84-0	50*
	Fluoranthene	206-44-0	500
	Fluorene	86-73-7	386^
	Hexachlorobenzene	118-74-1	3.2^
	Hexachlorobutadiene	87-68-3	-
	Hexachlorocyclopentadiene	77-47-4	-
	Hexachloroethane	67-72-1	-
	Indeno[1,2,3-cd]Pyrene	193-39-5	5.6
	Isophorone	78-59-1	4.4*
	Naphthalene	91-20-3	12^
	Nitrobenzene	98-95-3	0.200 (M)*
	N-Nitroso-Di-n-propylamine	621-64-7	-
	N-Nitrosodiphenylamine	86-30-6	-
	Pentachlorophenol	87-86-5	0.8^
	Phenanthrene	85-01-8	500
	Phenol	108-95-2	0.33^
	Pyrene	129-00-0	500

TABLE 6 - CLEANUP OBJECTIVES - SESI
CONCORD HOTEL AND RESORT
TOWN OF THOMPSON, SULLIVAN COUNTY, NEW YORK
NYSDEC BCP No. C353008
SESI CONSULTING ENGINEERS # 7180

SOIL			
Group	Analyte	CAS #	More Stringent of Commercial/Protection of Groundwater Soil Cleanup Objective (mg/Kg)
PCBSs	Aroclor-1016	12674-11-2	1
	Aroclor-1221	11104-28-2	1
	Aroclor-1232	11141-16-5	1
	Aroclor-1242	53469-21-9	1
	Aroclor-1248	12672-29-6	1
	Aroclor-1254	11097-69-1	1
	Aroclor-1260	11096-82-5	1
HERBICIDES & PESTICIDES	2,4-D		0.5*
	2,4,5-T		1.9*
	2,4,5-TP Acid (Silvex)	93-72-1	3.8^
	Aldrin	309-00-2	0.19^
	Alpha-BHC	319-84-6	0.02^
	Beta-BHC	319-85-7	0.09^
	Chlordane	57-74-9	2.9^
	Delta-BHC	319-86-8	0.25^
	Dieldrin	60-57-1	0.1^
	Endosulfan I	959-98-8	102^
	Endosulfan II	33213-65-9	102^
	Endosulfan Sulfate	1031-07-8	200
	Endrin	72-20-8	0.06^
	Endrin Aldehyde	7421-93-4	-
	Endrin Ketone	53494-70-5	-
	Gamma-BHC (Lindane)	58-89-9	0.1^
	Heptachlor	76-44-8	0.38^
	Heptachlor Epoxide	1024-57-3	0.02*
	Methoxychlor	72-43-5	10*
	P,P'-DDD	72-54-8	14
	P,P'-DDE	72-55-9	17^
	P,P'-DDT	50-29-3	47
	Parathion		1.2*
	Toxaphene	8001-35-2	-
VOCs	1,1,1-Trichloroethane	71-55-6	0.68^
	1,1,2,2-Tetrachloroethane	79-34-5	0.6*
	1,1,2-trichloro-1,2,2-trifluoroethane	76-13-1	6*
	1,1,2-Trichloroethane	79-00-5	-
	1,1-Dichloroethane	75-34-3	0.27^
	1,1-Dichloroethene	75-35-4	0.33^
	1,2,3-Trichloropropane	96-18-4	0.4*
	1,2,4-Trimethylbenzene	95-63-6	3.6^
	1,2-Dibromomethane	74-95-3	-
	1,2-Dibromo-3-chloropropane	96-12-8	-
	1,2-Dichlorobenzene	95-50-1	1.1^
	1,2-Dichloroethane	107-06-2	0.02^

TABLE 6 - CLEANUP OBJECTIVES - SESI
CONCORD HOTEL AND RESORT
TOWN OF THOMPSON, SULLIVAN COUNTY, NEW YORK
NYSDEC BCP No. C353008
SESI CONSULTING ENGINEERS # 7180

SOIL			
Group	Analyte	CAS #	More Stringent of Commercial/Protection of Groundwater Soil Cleanup Objective (mg/Kg)
VOCs	1,2-Dichloropropane	78-87-5	-
	1,3,5-Trimethylbenzene	108-67-8	8.4^
	1,3-Dichlorobenzene	541-73-1	2.4^
	1,3-Dichloropropane	142-28-9	0.3*
	1,4-Dichlorobenzene	106-46-7	1.8^
	1,4-Dioxane	123-91-1	0.1^
	2-Butanone (Methyl ethyl ketone)	78-93-3	0.12^
	2-Hexanone	591-78-6	-
	4-Isopropyltoluene	99-87-6	11 (APA)*
	4-Methyl-2-Pentanone	108-10-1	1*
	Acetone	67-64-1	0.05^
	Benzene	71-43-2	0.06^
	Bromodichloromethane	75-27-4	-
	Bromoform	75-25-2	-
	Bromomethane	74-83-9	-
	Carbon disulfide	75-15-0	2.7*
	Carbon tetrachloride	56-23-5	0.76^
	Chlorobenzene	108-90-7	1.1^
	Chloroethane	75-00-3	1.9*
	Chloroform	67-66-3	0.37^
	Chloromethane	74-87-3	-
	Cis-1,2-Dichloroethene	156-59-2	0.25^
	Cis-1,3-Dichloropropene	10061-01-5	-
	Cyclohexane	110-82-7	
	Dibromochloromethane	124-48-1	-
	Dichlorodifluoromethane	75-71-8	-
	Ethylbenzene	100-41-4	1^
	Isopropylbenzene	98-82-8	-
	M&p-Xylenes	1330-20-7	1.6^
	Methylene chloride	75-09-2	0.05^
	Methylcyclohexane	108-87-2	-
	Methyl-t-butyl ether	1634-04-4	0.93^
	n-Butylbenzene	104-51-8	12^
	n-Propylbenzene	103-65-1	3.9^
	O-Xylene	95-47-6	1.6^
	sec-Butylbenzene	135-98-8	11^
	Styrene	100-42-5	-
	t-Butyl Alcohol	75-65-0	-
	t-Butylbenzene	98-06-6	5.9^
	Tetrachloroethene	127-18-4	1.3^
	Toluene	108-88-3	0.7^
	Trans-1,2-dichloroethene	156-60-5	0.19^
	Trans-1,3-dichloropropene	10061-02-6	-
	Trichloroethene	79-01-6	0.47^
	Trichlorofluoromethane	75-69-4	-

TABLE 6 - CLEANUP OBJECTIVES - SESI
CONCORD HOTEL AND RESORT
TOWN OF THOMPSON, SULLIVAN COUNTY, NEW YORK
NYSDEC BCP No. C353008
SESI CONSULTING ENGINEERS # 7180

SOIL			
Group	Analyte	CAS #	More Stringent of Commercial/Protection of Groundwater Soil Cleanup Objective (mg/Kg)
VOCs	Vinyl chloride	75-01-4	0.02^
	Cyanide	57-12-5	27

* - TAGM 4046 Recommended Soil Cleanup Objectives
^ - Protection of Groundwater

TABLE 1 - SAMPLING SUMMARY TABLE
CONCORD HOTEL AND RESORT
TOWN OF THOMPSON, NEW YORK
NYSDEC BCP No. C353008
SESI CONSULTING ENGINEERS PROJECT # 7180

SAMPLE #	LAB ID #	DATE COLLECTED	MATRIX	DEPTH (FT-BGS)	ANALYTICAL PARAMETERS
SOIL SAMPLES					
OU-1A-1A	08080627-01, x0823102, Y0823102, Z0823102	8/19/2008	Soil	0 - 0.8	Metals, SVOC's, PCB's, Pest, VOC's
OU-1A-1B	08080627-02, x0823103, Y0823103, Z0823103	8/19/2008	Soil	27.5 - 28.4	Metals, SVOC's, PCB's, Pest, VOC's
OU-1A-2A	08080627-03, x0823201, Y0823201, Z0823201	8/19/2008	Soil	1 - 1.6	Metals, SVOC's, PCB's, Pest, VOC's
OU-1A-2B	08080627-04, x0823202, Y0823202, Z0823202	8/19/2008	Soil	22.4 - 23.2	Metals, SVOC's, PCB's, Pest, VOC's
OU-1A-3A	08080627-05, x0823203, Y0823203, Z0823203	8/19/2008	Soil	1.6 - 2.5	Metals, SVOC's, PCB's, Pest, VOC's
OU-1A-3B	08080627-06, x0823204, Y0823204, Z0823204	8/19/2008	Soil	22 - 22.5	Metals, SVOC's, PCB's, Pest, VOC's
OU-1A-5A	08080627-07, x0823205, Y0823205, Z0823205	8/19/2008	Soil	0.5 - 1.2	Metals, SVOC's, PCB's, Pest, VOC's
OU-1A-6A	08080627-08, x0823206, Y0823206, Z0823206	8/19/2008	Soil	0 - 1.25	Metals, SVOC's, PCB's, Pest, VOC's
OU-1A-6B	08080684-01 , x0823207, Y0823207, Z0823207	8/19/2008	Soil	7 - 7.8	Metals, SVOC's, PCB's, Pest, VOC's
OU-1A-8A	08080684-02, x0823208, Y0823208, Z0823208	8/19/2008	Soil	0 - 1	Metals, SVOC's, PCB's, Pest, VOC's
OU-1A-8B	08080684-03, x0823209, Y0823209, Z0823209	8/19/2008	Soil	3.2 - 3.2	Metals, SVOC's, PCB's, Pest, VOC's
OU-1A-9A	08080684-04, x0823210, Y0823210, Z0823210	8/19/2008	Soil	0 - 0.75	Metals, SVOC's, PCB's, Pest, VOC's
OU-1A-9ARA	Z0823210RA	8/19/2008	Soil	0 - 0.75	VOC's
OU-1A-9A x4	x0823210x4	8/19/2008	Soil	0 - 0.75	SVOC's
OU-1A-10A	08080684-05, x0823211, Y0823211, Z0823211	8/19/2008	Soil	0.3 - 1	Metals, SVOC's, PCB's, Pest, VOC's
OU-1A-10B	08080684-06, x0823212, Y0823212, Z0823212	8/19/2008	Soil	5.8 - 6.4	Metals, SVOC's, PCB's, Pest, VOC's
OU-1A-10C	08080684-07, x0823213, Y0823213, Z0823213	8/19/2008	Soil	7.5 - 8.2	Metals, SVOC's, PCB's, Pest, VOC's
OU-1A-10C x10	x0823213x10	8/19/2008	Soil	7.5 - 8.2	SVOC's
OU-1A-10D	08080684-08, x0823214, Y0823214, Z0823214	8/19/2008	Soil	12.8 - 13.8	Metals, SVOC's, PCB's, Pest, VOC's
OU-1A-11A	08080684-19, Y0823218, Z0823218	8/19/2008	Soil	1.3 - 2.1	Metals, PCB's, Pest, VOC's
OU-1A-11ARA	Z0823218RA	8/19/2008	Soil	1.3 - 2.1	VOC's
OU-1A-11A x10	x0823218x10	8/19/2008	Soil	1.3 - 2.1	SVOC's
OU-1A-11B	08080684-20, x0823219, Y0823219, Z0823219, 08090074-32	8/19/2008	Soil	11.7 - 12	Metals, SVOC's, PCB's, Pest, VOC's
OU-1A-12A	x0823308, Z0823308	8/20/2008	Soil	0.8 - 1.5	SVOC's, VOC's
OU-1A-12B	x0823309, Z0823309	8/20/2008	Soil	12.75 - 13.6	SVOC's, VOC's
OU-1A-13A	Z0823306	8/20/2008	Soil	0.2 - 0.8	VOC's
OU-1A-13Ax4	x0823306x4	8/20/2008	Soil	0.2 - 0.8	SVOC's
OU-1A-13B	x0823307, OU-1A-13B	8/20/2008	Soil	13 - 13.7	SVOC's, VOC's
OU-1A-14A	x0823220, Z0823220	8/19/2008	Soil	0.5 - 1.2	SVOC's, VOC's
OU-1A-14B	x0823221, Z0823221	8/19/2008	Soil	17.3 - 18	SVOC's, VOC's
OU-1A-15A	x0823301, Z0823301	8/20/2008	Soil	0.5 - 1	SVOC's, VOC's
OU-1A-15B	Z0823302	8/20/2008	Soil	6.4 - 7.3	VOC's
OU-1A-15Bx10	x0823302x10	8/20/2008	Soil	6.4 - 7.3	SVOC's
OU-1A-15C	Z0823303	8/20/2008	Soil	11.3 - 12	VOC's
OU-1A-15C x20	x0823303x20	8/20/2008	Soil	11.3 - 12	SVOC's
OU-1A-15D	Z0823304	8/20/2008	Soil	20.5 - 21.5	VOC's
OU-1A-15Dx20	x0823304x20	8/20/2008	Soil	20.5 - 21.5	SVOC's
OU-1A-15E	x0823305, Z0823305	8/20/2008	Soil	26.1 - 26.6	SVOC's, VOC's
OU-1A-18A	x0823215, Z0823215	8/19/2008	Soil	1 - 1.8	SVOC's, VOC's
OU-1A-T10A	Y0823217	8/19/2008	Soil	0 - 0.5	PCB's
OU-1A-T10B	08090651-03	9/17/2008	Soil	4 - 4.5	PCB's
OU-1A-T13A	08090651-01	9/17/2008	Soil	0 - 0.5	PCB's
OU-1A-T13B	08090451-02	9/17/2008	Soil	2.5 - 3	PCB's
GROUNDWATER SAMPLES					
MW-OU-1A 4U	AC39843-003	9/10/2008	Groundwater	N/A	Metals, SVOC's, PCB's, Pest, VOC's
MW-OU-1A 4F	AC39843-004	9/10/2008	Groundwater	N/A	Metals
MW-OU-1A 7U	AC39796-001	9/8/2008	Groundwater	N/A	Metals, SVOC's, PCB's, Pest, VOC's
MW-OU-1A 7F	AC39796-001	9/8/2008	Groundwater	N/A	Metals
MW-OU-1A 17	AC39961-010	9/15/2008	Groundwater	N/A	VOC's
MW-OU-1A 19U	AC39843-001	9/10/2008	Groundwater	N/A	Metals, SVOC's, PCB's, Pest, VOC's
MW-OU-1A 19F	AC39843-002	9/10/2008	Groundwater	N/A	Metals

TABLE 2 - EXCEEDANCES OF SOIL/FILL SCOs
CONCORD HOTEL AND RESORT
TOWN OF THOMPSON, NEW YORK
NYSDEC BCP No. C353008
SESI CONSULTING ENGINEERS PROJECT # 7180

TestName	Unrestricted Track 1 SCO (ug/kg)	Protection of Public Health Commercial (ug/kg)	Protection of Groundwater (ug/kg)	OU-1A-1A Z0823102 8/18/08				OU-1A-1B Z0823103 8/18/08				OU-1A-2A Z0823201 8/19/08				OU-1A-2B Z0823202 8/19/08			
				Result	Flg	RL	Units	Result	Flg	RL	Units	Result	Flg	RL	Units	Result	Flg	RL	Units
Volatile Organics																			
1,1,1-Trichloroethane	680	500,000	680	ND		1.1	ug/kg	ND		1.1	ug/kg	ND		1.2	ug/kg	ND		1.3	ug/kg
1,1,2,2-Tetrachloroethane	600	NA	NA	ND		1.1	ug/kg	ND		1.1	ug/kg	ND		1.2	ug/kg	ND		1.3	ug/kg
1,1,2-Trichloroethane	NA	NA	NA	ND		1.1	ug/kg	ND		1.1	ug/kg	ND		1.2	ug/kg	ND		1.3	ug/kg
1,1,2-Trichlorotrifluoroethane	6,000	NA	NA	ND		1.1	ug/kg	ND		1.1	ug/kg	ND		1.2	ug/kg	ND		1.3	ug/kg
1,1-Dichloroethane	270	240,000	270	ND		1.1	ug/kg	ND		1.1	ug/kg	ND		1.2	ug/kg	ND		1.3	ug/kg
1,1-Dichloroethene	330	500,000	330	ND		1.1	ug/kg	ND		1.1	ug/kg	ND		1.2	ug/kg	ND		1.3	ug/kg
1,2-Dibromo-3-chloropropane	NA	NA	NA	ND		1.1	ug/kg	ND		1.1	ug/kg	ND		1.2	ug/kg	ND		1.3	ug/kg
1,2-Dibromoethane	NA	NA	NA	ND		1.1	ug/kg	ND		1.1	ug/kg	ND		1.2	ug/kg	ND		1.3	ug/kg
1,2-Dichlorobenzene	1,100	500,000	1,100	ND		1.1	ug/kg	ND		1.1	ug/kg	ND		1.2	ug/kg	ND		1.3	ug/kg
1,2-Dichloroethane	20	30,000	20	ND		1.1	ug/kg	ND		1.1	ug/kg	ND		1.2	ug/kg	ND		1.3	ug/kg
1,2-Dichloropropane	NA	NA	NA	ND		1.1	ug/kg	ND		1.1	ug/kg	ND		1.2	ug/kg	ND		1.3	ug/kg
1,3-Dichlorobenzene	2,400	280,000	2,400	ND		1.1	ug/kg	ND		1.1	ug/kg	ND		1.2	ug/kg	ND		1.3	ug/kg
1,4-Dichlorobenzene	1,800	130,000	1,800	ND		1.1	ug/kg	ND		1.1	ug/kg	ND		1.2	ug/kg	ND		1.3	ug/kg
2-Butanone	120	NA	NA	ND		55	ug/kg	ND		54	ug/kg	ND		6	ug/kg	ND		6.3	ug/kg
2-Hexanone	NA	NA	NA	ND		140	ug/kg	ND		140	ug/kg	ND		6	ug/kg	ND		6.3	ug/kg
4-Methyl-2-pentanone	1,000	NA	NA	ND		140	ug/kg	ND		140	ug/kg	ND		6	ug/kg	ND		6.3	ug/kg
Acetone	50	500,000	50	ND		28	ug/kg	ND		27	ug/kg	ND		30	ug/kg	ND		32	ug/kg
Benzene	60	44,000	60	ND		1.1	ug/kg	ND		1.1	ug/kg	ND		1.2	ug/kg	ND		1.3	ug/kg
Bromodichloromethane	NA	NA	NA	ND		1.1	ug/kg	ND		1.1	ug/kg	ND		1.2	ug/kg	ND		1.3	ug/kg
Bromoform	NA	NA	NA	ND		1.1	ug/kg	ND		1.1	ug/kg	ND		1.2	ug/kg	ND		1.3	ug/kg
Bromomethane	NA	NA	NA	ND		1.1	ug/kg	ND		1.1	ug/kg	ND		1.2	ug/kg	ND		1.3	ug/kg
Carbon Disulfide	2,700	NA	NA	ND		1.1	ug/kg	ND		1.1	ug/kg	ND		1.2	ug/kg	ND		1.3	ug/kg
Carbon Tetrachloride	760	22,000	760	ND		1.1	ug/kg	ND		1.1	ug/kg	ND		1.2	ug/kg	ND		1.3	ug/kg
Chlorobenzene	1,100	500,000	1,100	ND		1.1	ug/kg	ND		1.1	ug/kg	ND		1.2	ug/kg	ND		1.3	ug/kg
Chloroethane	1,900	NA	NA	ND		1.1	ug/kg	ND		1.1	ug/kg	ND		1.2	ug/kg	ND		1.3	ug/kg
Chloroform	370	350,000	370	ND		1.1	ug/kg	ND		1.1	ug/kg	ND		1.2	ug/kg	ND		1.3	ug/kg
Chloromethane	NA	NA	NA	ND		1.1	ug/kg	ND		1.1	ug/kg	ND		1.2	ug/kg	ND		1.3	ug/kg
cis-1,2-Dichloroethene	250	NA	NA	ND		1.1	ug/kg	ND		1.1	ug/kg	ND		1.2	ug/kg	ND		1.3	ug/kg
cis-1,3-Dichloropropene	NA	NA	NA	ND		1.1	ug/kg	ND		1.1	ug/kg	ND		1.2	ug/kg	ND		1.3	ug/kg
Cyclohexane	NA	NA	NA	ND		1.1	ug/kg	ND		1.1	ug/kg	ND		1.2	ug/kg	ND		1.3	ug/kg
Dibromochloromethane	NA	NA	NA	ND		1.1	ug/kg	ND		1.1	ug/kg	ND		1.2	ug/kg	ND		1.3	ug/kg
Dichlorodifluoromethane	NA	NA	NA	ND		28	ug/kg	ND		27	ug/kg	ND		12	ug/kg	ND		13	ug/kg
Ethylbenzene	1,000	390,000	1,000	ND		1.1	ug/kg	ND		1.1	ug/kg	ND		1.2	ug/kg	ND		1.3	ug/kg
Isopropylbenzene	NA	NA	NA	ND		1.1	ug/kg	ND		1.1	ug/kg	ND		1.2	ug/kg	ND		1.3	ug/kg
m&p-Xylenes	260	NA	NA	ND		2.2	ug/kg	ND		2.2	ug/kg	ND		2.4	ug/kg	ND		2.5	ug/kg
Methylcyclohexane	NA	NA	NA	ND		28	ug/kg	ND		27	ug/kg	ND		1.2	ug/kg	ND		1.3	ug/kg
Methylene Chloride	50	500,000	50	ND		1.1	ug/kg	ND		1.1	ug/kg	ND		1.2	ug/kg	ND		1.3	ug/kg
Methyl-tert-butyl Ether	930	NA	NA	ND		1.1	ug/kg	ND		1.1	ug/kg	ND		1.2	ug/kg	ND		1.3	ug/kg
o-Xylene	260	NA	NA	ND		1.1	ug/kg	ND		1.1	ug/kg	ND		1.2	ug/kg	ND		1.3	ug/kg
Styrene	NA	NA	NA	ND		1.1	ug/kg	ND		1.1	ug/kg	ND		1.2	ug/kg	ND		1.3	ug/kg
tert-Butyl Alcohol	NA	NA	NA	ND		140	ug/kg	ND		140	ug/kg	ND		6	ug/kg	ND		6.3	ug/kg
Tetrachloroethene	1,300	150,000	1,300	ND		1.1	ug/kg	ND		1.1	ug/kg	ND		1.2	ug/kg	ND		1.3	ug/kg
Toluene	700	500,000	700	ND		1.1	ug/kg	ND		1.1	ug/kg	ND		1.2	ug/kg	ND		1.3	ug/kg
trans-1,2-Dichloroethene	190	NA	NA	ND		1.1	ug/kg	ND		1.1	ug/kg	ND		1.2	ug/kg	ND		1.3	ug/kg
trans-1,3-Dichloropropene	NA	NA	NA	ND		1.1	ug/kg	ND		1.1	ug/kg	ND		1.2	ug/kg	ND		1.3	ug/kg
Trichloroethene	470	200,000	470	ND		1.1	ug/kg	ND		1.1	ug/kg	ND		1.2	ug/kg	ND		1.3	ug/kg
Trichlorofluoromethane	NA	NA	NA	ND		1.1	ug/kg	ND		1.1	ug/kg	ND		1.2	ug/kg	ND		1.3	ug/kg
Vinyl Chloride	20	13,000	20	ND		1.1	ug/kg	ND		1.1	ug/kg	ND		1.2	ug/kg	ND		1.3	ug/kg

Shaded values indicate a Track 1 SCO exceedance
NA - Not Applicable
N/A - Not Analyzed
ND - Not Detected
SB - Soil Background
RL - Laboratory Reporting Limit

TABLE 2 - EXCEEDANCES OF SOIL/FILL SCOs
CONCORD HOTEL AND RESORT
TOWN OF THOMPSON, NEW YORK
NYSDEC BCP No. C353008
SESI CONSULTING ENGINEERS PROJECT # 7180

TestName	Unrestricted Track 1 SCO (ug/kg)	Protection of Public Health Commercial (ug/kg)	Protection of Groundwater (ug/kg)	OU-1A-1A Z0823102 8/18/08				OU-1A-1B Z0823103 8/18/08				OU-1A-2A Z0823201 8/19/08				OU-1A-2B Z0823202 8/19/08			
				Result	Flg	RL	Units	Result	Flg	RL	Units	Result	Flg	RL	Units	Result	Flg	RL	Units
Semi Volatile Organics																			
(3 & 4)-Methylphenol	330	NA	NA	ND		71	ug/kg	ND		72	ug/kg	ND		63	ug/kg	ND		60	ug/kg
1,2,4-Trichlorobenzene	3,400	NA	NA	ND		71	ug/kg	ND		72	ug/kg	ND		63	ug/kg	ND		60	ug/kg
2,4,5-Trichlorophenol	100	NA	NA	ND		71	ug/kg	ND		72	ug/kg	ND		63	ug/kg	ND		60	ug/kg
2,4,6-Trichlorophenol	NA	NA	NA	ND		71	ug/kg	ND		72	ug/kg	ND		63	ug/kg	ND		60	ug/kg
2,4-Dichlorophenol	400	NA	NA	ND		71	ug/kg	ND		72	ug/kg	ND		63	ug/kg	ND		60	ug/kg
2,4-Dimethylphenol	NA	NA	NA	ND		71	ug/kg	ND		72	ug/kg	ND		63	ug/kg	ND		60	ug/kg
2,4-Dinitrophenol	200	NA	NA	ND		1400	ug/kg	ND		1400	ug/kg	ND		1,300	ug/kg	ND		1,200	ug/kg
2,4-Dinitrotoluene	NA	NA	NA	ND		71	ug/kg	ND		72	ug/kg	ND		63	ug/kg	ND		60	ug/kg
2,6-Dinitrotoluene	1,000	NA	NA	ND		71	ug/kg	ND		72	ug/kg	ND		63	ug/kg	ND		60	ug/kg
2-Chloronaphthalene	NA	NA	NA	ND		71	ug/kg	ND		72	ug/kg	ND		63	ug/kg	ND		60	ug/kg
2-Chlorophenol	800	NA	NA	ND		71	ug/kg	ND		72	ug/kg	ND		63	ug/kg	ND		60	ug/kg
2-Methyl-4,6-dinitrophenol	NA	NA	NA	ND		1400	ug/kg	ND		1400	ug/kg	ND		1,300	ug/kg	ND		1,200	ug/kg
2-Methylnaphthalene	36,400	NA	NA	ND		71	ug/kg	ND		72	ug/kg	ND		63	ug/kg	ND		60	ug/kg
2-Methylphenol	330	NA	NA	ND		71	ug/kg	ND		72	ug/kg	ND		63	ug/kg	ND		60	ug/kg
2-Nitroaniline	430	NA	NA	ND		71	ug/kg	ND		72	ug/kg	ND		63	ug/kg	ND		60	ug/kg
2-Nitrophenol	330	NA	NA	ND		71	ug/kg	ND		72	ug/kg	ND		63	ug/kg	ND		60	ug/kg
3,3'-Dichlorobenzidine	NA	NA	NA	ND		71	ug/kg	ND		72	ug/kg	ND		63	ug/kg	ND		60	ug/kg
3-Nitroaniline	500	NA	NA	ND		71	ug/kg	ND		72	ug/kg	ND		63	ug/kg	ND		60	ug/kg
4-Bromophenyl-phenylether	NA	NA	NA	ND		71	ug/kg	ND		72	ug/kg	ND		63	ug/kg	ND		60	ug/kg
4-Chloro-3-methylphenol	240	NA	NA	ND		71	ug/kg	ND		72	ug/kg	ND		63	ug/kg	ND		60	ug/kg
4-Chloroaniline	220	NA	NA	ND		71	ug/kg	ND		72	ug/kg	ND		63	ug/kg	ND		60	ug/kg
4-Chlorophenyl-phenylether	NA	NA	NA	ND		71	ug/kg	ND		72	ug/kg	ND		63	ug/kg	ND		60	ug/kg
4-Nitroaniline	NA	NA	NA	ND		71	ug/kg	ND		72	ug/kg	ND		63	ug/kg	ND		60	ug/kg
4-Nitrophenol	100	NA	NA	ND		71	ug/kg	ND		72	ug/kg	ND		63	ug/kg	ND		60	ug/kg
Acenaphthene	20,000	500,000	98,000	ND		71	ug/kg	ND		72	ug/kg	ND		63	ug/kg	ND		60	ug/kg
Acenaphthylene	100,000	500,000	107,000	ND		71	ug/kg	ND		72	ug/kg	ND		63	ug/kg	ND		60	ug/kg
Aniline	100	NA	NA	ND		71	ug/kg	ND		72	ug/kg	ND		63	ug/kg	ND		60	ug/kg
Anthracene	100,000	500,000	1,000,000	ND		71	ug/kg	ND		72	ug/kg	ND		63	ug/kg	ND		60	ug/kg
Benzo(a)anthracene	1,000	5,600	1,000	ND		71	ug/kg	ND		72	ug/kg	ND		63	ug/kg	ND		60	ug/kg
Benzo(a)pyrene	1,000	1,000	22,000	ND		71	ug/kg	ND		72	ug/kg	ND		63	ug/kg	ND		60	ug/kg
Benzo(b)fluoranthene	1,000	5,600	1,700	ND		71	ug/kg	ND		72	ug/kg	ND		63	ug/kg	ND		60	ug/kg
Benzo(g,h,i)perylene	100,000	500,000	1,000,000	ND		71	ug/kg	ND		72	ug/kg	ND		63	ug/kg	ND		60	ug/kg
Benzo(k)fluoranthene	800	56,000	1,700	ND		71	ug/kg	ND		72	ug/kg	ND		63	ug/kg	ND		60	ug/kg
bis(2-Chloroethoxy)methane	NA	NA	NA	ND		71	ug/kg	ND		72	ug/kg	ND		63	ug/kg	ND		60	ug/kg
bis(2-Chloroethyl)ether	NA	NA	NA	ND		71	ug/kg	ND		72	ug/kg	ND		63	ug/kg	ND		60	ug/kg
bis(2-Ethylhexyl)phthalate	50,000	NA	NA	76		71	ug/kg	ND		140	ug/kg	ND		130	ug/kg	ND		120	ug/kg
Butylbenzylphthalate	50,000	NA	NA	ND		71	ug/kg	ND		72	ug/kg	ND		63	ug/kg	ND		60	ug/kg
Carbazole	NA	NA	NA	ND		71	ug/kg	ND		72	ug/kg	ND		63	ug/kg	ND		60	ug/kg
Chrysene	1,000	56,000	1,000	ND		71	ug/kg	ND		72	ug/kg	ND		63	ug/kg	ND		60	ug/kg
Dibenz(a,h)anthracene	330	560	1,000,000	ND		71	ug/kg	ND		72	ug/kg	ND		63	ug/kg	ND		60	ug/kg

Shaded values indicate a Track 1 SCO exceedance
NA - Not Applicable
N/A - Not Analyzed
ND - Not Detected
SB - Soil Background
RL - Laboratory Reporting Limit

TABLE 2 - EXCEEDANCES OF SOIL/FILL SCOs
CONCORD HOTEL AND RESORT
TOWN OF THOMPSON, NEW YORK
NYSDEC BCP No. C353008
SESI CONSULTING ENGINEERS PROJECT # 7180

TestName	Unrestricted Track 1 SCO (ug/kg)	Protection of Public Health Commercial (ug/kg)	Protection of Groundwater (ug/kg)	OU-1A-1A Z0823102 8/18/08				OU-1A-1B Z0823103 8/18/08				OU-1A-2A Z0823201 8/19/08				OU-1A-2B Z0823202 8/19/08			
				Result	Flg	RL	Units	Result	Flg	RL	Units	Result	Flg	RL	Units	Result	Flg	RL	Units
Dibenzofuran	7,000	NA	NA	ND		71	ug/kg	ND		72	ug/kg	ND		63	ug/kg	ND		60	ug/kg
Diethylphthalate	7,100	NA	NA	ND		71	ug/kg	ND		72	ug/kg	ND		63	ug/kg	ND		60	ug/kg
Dimethylphthalate	2,000	NA	NA	ND		71	ug/kg	ND		72	ug/kg	ND		63	ug/kg	ND		60	ug/kg
Di-n-butylphthalate	8,100	NA	NA	ND		71	ug/kg	ND		72	ug/kg	ND		63	ug/kg	ND		60	ug/kg
Di-n-Octylphthalate	50,000	NA	NA	ND		71	ug/kg	ND		72	ug/kg	ND		63	ug/kg	ND		60	ug/kg
Diphenylamine	NA	NA	NA	ND		71	ug/kg	ND		72	ug/kg	ND		63	ug/kg	ND		60	ug/kg
Fluoranthene	100,000	500,000	1,000,000	ND		71	ug/kg	ND		72	ug/kg	ND		63	ug/kg	ND		60	ug/kg
Fluorene	30,000	500,000	386,000	ND		71	ug/kg	ND		72	ug/kg	ND		63	ug/kg	ND		60	ug/kg
Hexachlorobenzene	330	6,000	3,200	ND		71	ug/kg	ND		72	ug/kg	ND		63	ug/kg	ND		60	ug/kg
Hexachlorobutadiene	NA	NA	NA	ND		71	ug/kg	ND		72	ug/kg	ND		63	ug/kg	ND		60	ug/kg
Hexachlorocyclopentadiene	NA	NA	NA	ND		71	ug/kg	ND		72	ug/kg	ND		63	ug/kg	ND		60	ug/kg
Hexachloroethane	NA	NA	NA	ND		71	ug/kg	ND		72	ug/kg	ND		63	ug/kg	ND		60	ug/kg
Indeno(1,2,3-cd)pyrene	500	5,600	8,200	ND		71	ug/kg	ND		72	ug/kg	ND		63	ug/kg	ND		60	ug/kg
Isophorone	4,400	NA	NA	ND		71	ug/kg	ND		72	ug/kg	ND		63	ug/kg	ND		60	ug/kg
Naphthalene	12,000	500,000	12,000	ND		71	ug/kg	ND		72	ug/kg	ND		63	ug/kg	ND		60	ug/kg
Nitrobenzene	200	NA	NA	ND		71	ug/kg	ND		72	ug/kg	ND		63	ug/kg	ND		60	ug/kg
n-Nitroso-di-n-propylamine	NA	NA	NA	ND		71	ug/kg	ND		72	ug/kg	ND		63	ug/kg	ND		60	ug/kg
Pentachlorophenol	800	6,700	800	ND		71	ug/kg	ND		72	ug/kg	ND		63	ug/kg	ND		60	ug/kg
Phenanthrene	100,000	500,000	1,000,000	ND		71	ug/kg	ND		72	ug/kg	ND		63	ug/kg	ND		60	ug/kg
Phenol	330	500,000	330	ND		71	ug/kg	ND		72	ug/kg	ND		63	ug/kg	ND		60	ug/kg
Pyrene	100,000	500,000	1,000,000	ND		71	ug/kg	ND		72	ug/kg	ND		63	ug/kg	ND		60	ug/kg
TPH	NA	NA	NA	ND		110000	ug/kg	ND		120000	ug/kg	ND		100,000	ug/kg	ND		95,000	ug/kg
Pesticides																			
4,4'-DDD	3.3	92,000	14,000	ND		2.9	ug/kg	ND		2.9	ug/kg	ND		2.5	ug/kg	ND		2.4	ug/kg
4,4'-DDE	3.3	62,000	17,000	ND		2.9	ug/kg	ND		2.9	ug/kg	ND		2.5	ug/kg	ND		2.4	ug/kg
4,4'-DDT	3.3	47,000	136,000	ND		2.9	ug/kg	ND		2.9	ug/kg	ND		2.5	ug/kg	ND		2.4	ug/kg
Aldrin	5	680	190	ND		2.9	ug/kg	ND		2.9	ug/kg	ND		2.5	ug/kg	ND		2.4	ug/kg
alpha-BHC	20	3,400	20	ND		5.7	ug/kg	ND		5.8	ug/kg	ND		5.1	ug/kg	ND		4.8	ug/kg
alpha-Chlordane	94	24,000	2,900	ND		5.7	ug/kg	ND		5.8	ug/kg	ND		5.1	ug/kg	ND		4.8	ug/kg
beta-BHC	36	3,000	90	ND		5.7	ug/kg	ND		5.8	ug/kg	ND		5.1	ug/kg	ND		4.8	ug/kg
delta-BHC	40	500,000	250	ND		5.7	ug/kg	ND		5.8	ug/kg	ND		5.1	ug/kg	ND		4.8	ug/kg
Dieldrin	5	1,400	100	ND		2.9	ug/kg	ND		2.9	ug/kg	ND		2.5	ug/kg	ND		2.4	ug/kg
Endosulfan I	2,400	200,000	102,000	ND		23	ug/kg	ND		23	ug/kg	ND		20	ug/kg	ND		19	ug/kg
Endosulfan II	2,400	200,000	102,000	ND		23	ug/kg	ND		23	ug/kg	ND		20	ug/kg	ND		19	ug/kg
Endosulfan sulfate	2,400	200,000	1,000,000	ND		23	ug/kg	ND		23	ug/kg	ND		20	ug/kg	ND		19	ug/kg
Endrin	14	89,000	60	ND		5.7	ug/kg	ND		5.8	ug/kg	ND		5.1	ug/kg	ND		4.8	ug/kg
Endrin aldehyde	NA	NA	NA	ND		23	ug/kg	ND		23	ug/kg	ND		20	ug/kg	ND		19	ug/kg
Endrin ketone	NA	NA	NA	ND		23	ug/kg	ND		23	ug/kg	ND		20	ug/kg	ND		19	ug/kg
gamma-BHC	100	NA	NA	ND		5.7	ug/kg	ND		5.8	ug/kg	ND		5.1	ug/kg	ND		4.8	ug/kg
gamma-Chlordane	94	NA	NA	ND		5.7	ug/kg	ND		5.8	ug/kg	ND		5.1	ug/kg	ND		4.8	ug/kg
Heptachlor	42	15,000	380	ND		5.7	ug/kg	ND		5.8	ug/kg	ND		5.1	ug/kg	ND		4.8	ug/kg
Heptachlor epoxide	20	NA	NA	ND		5.7	ug/kg	ND		5.8	ug/kg	ND		5.1	ug/kg	ND		4.8	ug/kg
Methoxychlor	10,000	NA	NA	ND		23	ug/kg	ND		23	ug/kg	ND		20	ug/kg	ND		19	ug/kg

Shaded values indicate a Track 1 SCO exceedance
NA - Not Applicable
N/A - Not Analyzed
ND - Not Detected
SB - Soil Background
RL - Laboratory Reporting Limit

TABLE 2 - EXCEEDANCES OF SOIL/FILL SCOs
CONCORD HOTEL AND RESORT
TOWN OF THOMPSON, NEW YORK
NYSDEC BCP No. C353008
SESI CONSULTING ENGINEERS PROJECT # 7180

TestName	Unrestricted Track 1 SCO (ug/kg)	Protection of Public Health Commercial (ug/kg)	Protection of Groundwater (ug/kg)	OU-1A-1A Z0823102 8/18/08				OU-1A-1B Z0823103 8/18/08				OU-1A-2A Z0823201 8/19/08				OU-1A-2B Z0823202 8/19/08			
				Result	Flg	RL	Units	Result	Flg	RL	Units	Result	Flg	RL	Units	Result	Flg	RL	Units
PCB's																			
Aroclor 1221-1	100	1,000	3,200	ND		71	ug/kg	ND		72	ug/kg	ND		63	ug/kg	ND		60	ug/kg
Aroclor 1221-2	100	1,000	3,200	ND		71	ug/kg	ND		72	ug/kg	ND		63	ug/kg	ND		60	ug/kg
Aroclor 1221-3	100	1,000	3,200	ND		71	ug/kg	ND		72	ug/kg	ND		63	ug/kg	ND		60	ug/kg
Aroclor 1232-1	100	1,000	3,200	ND		71	ug/kg	ND		72	ug/kg	ND		63	ug/kg	ND		60	ug/kg
Aroclor 1232-2	100	1,000	3,200	ND		71	ug/kg	ND		72	ug/kg	ND		63	ug/kg	ND		60	ug/kg
Aroclor 1232-3	100	1,000	3,200	ND		71	ug/kg	ND		72	ug/kg	ND		63	ug/kg	ND		60	ug/kg
Aroclor 1242-1	100	1,000	3,200	ND		71	ug/kg	ND		72	ug/kg	ND		63	ug/kg	ND		60	ug/kg
Aroclor 1242-2	100	1,000	3,200	ND		71	ug/kg	ND		72	ug/kg	ND		63	ug/kg	ND		60	ug/kg
Aroclor 1242-3	100	1,000	3,200	ND		71	ug/kg	ND		72	ug/kg	ND		63	ug/kg	ND		60	ug/kg
Aroclor 1248-1	100	1,000	3,200	ND		71	ug/kg	ND		72	ug/kg	ND		63	ug/kg	ND		60	ug/kg
Aroclor 1248-2	100	1,000	3,200	ND		71	ug/kg	ND		72	ug/kg	ND		63	ug/kg	ND		60	ug/kg
Aroclor 1248-3	100	1,000	3,200	ND		71	ug/kg	ND		72	ug/kg	ND		63	ug/kg	ND		60	ug/kg
Aroclor 1254-1	100	1,000	3,200	ND		71	ug/kg	ND		72	ug/kg	ND		63	ug/kg	ND		60	ug/kg
Aroclor 1254-2	100	1,000	3,200	ND		71	ug/kg	ND		72	ug/kg	ND		63	ug/kg	ND		60	ug/kg
Aroclor 1254-3	100	1,000	3,200	ND		71	ug/kg	ND		72	ug/kg	ND		63	ug/kg	ND		60	ug/kg
Aroclor 1016-1	100	1,000	3,200	ND		71	ug/kg	ND		72	ug/kg	ND		63	ug/kg	ND		60	ug/kg
Aroclor 1016-2	100	1,000	3,200	ND		71	ug/kg	ND		72	ug/kg	ND		63	ug/kg	ND		60	ug/kg
Aroclor 1016-3	100	1,000	3,200	ND		71	ug/kg	ND		72	ug/kg	ND		63	ug/kg	ND		60	ug/kg
Aroclor 1260-1	100	1,000	3,200	ND		71	ug/kg	ND		72	ug/kg	ND		63	ug/kg	ND		60	ug/kg
Aroclor 1260-2	100	1,000	3,200	ND		71	ug/kg	ND		72	ug/kg	ND		63	ug/kg	ND		60	ug/kg
Aroclor 1260-3	100	1,000	3,200	ND		71	ug/kg	ND		72	ug/kg	ND		63	ug/kg	ND		60	ug/kg
Metals	**(mg/kg)**	**(mg/kg)**	**(mg/kg)**																
Mercury	0.18	2.8	0.18	ND		0.1	mg/Kg	ND		0.1	mg/Kg	ND		0.1	mg/Kg	ND		0.1	mg/Kg
Aluminum	SB	NA	NA	8300		1.12	mg/Kg	10500		1.19	mg/Kg	10000		1.11	mg/Kg	8480		1.07	mg/Kg
Antimony	SB	NA	NA	ND		1.12	mg/Kg	ND		1.19	mg/Kg	ND		1.11	mg/Kg	ND		1.07	mg/Kg
Arsenic	13	16	16	4.05		1.12	mg/Kg	6.89		1.19	mg/Kg	2.57		1.11	mg/Kg	4.39		1.07	mg/Kg
Barium	350	400	820	74.5		0.561	mg/Kg	151		1.19	mg/Kg	54.2		1.11	mg/Kg	110		1.07	mg/Kg
Beryllium	7.2	590	47	ND		0.561	mg/Kg	ND		0.594	mg/Kg	ND		0.553	mg/Kg	0.57		0.535	mg/Kg
Cadmium	2.5	9.3	7.5	ND		2.24	mg/Kg	ND		0.594	mg/Kg	ND		0.553	mg/Kg	ND		0.535	mg/Kg
Calcium	SB	NA	NA	1210		0.561	mg/Kg	888		2.38	mg/Kg	967		2.21	mg/Kg	696		2.14	mg/Kg
Chromium	30	1,500	NA	7.79		1.12	mg/Kg	11.2		0.594	mg/Kg	8.79		0.553	mg/Kg	8.73		0.535	mg/Kg
Cobalt	30 or SB	NA	NA	6.8		1.12	mg/Kg	13.4		1.19	mg/Kg	7.58		1.11	mg/Kg	10.6		1.07	mg/Kg
Copper	50	270	1,720	22		1.12	mg/Kg	203		1.19	mg/Kg	18.6		1.11	mg/Kg	17.8		1.07	mg/Kg
Iron	2,000 or SB	NA	NA	13000		1.12	mg/Kg	19600		1.19	mg/Kg	14400		1.11	mg/Kg	15800		1.07	mg/Kg
Lead	63	1,000	450	155		2.24	mg/Kg	9.41		1.19	mg/Kg	26.1		1.11	mg/Kg	10.5		1.07	mg/Kg
Magnesium	SB	NA	NA	1880		1.12	mg/Kg	4760		2.38	mg/Kg	2350		2.21	mg/Kg	3630		2.14	mg/Kg
Manganese	1,600	10,000	2,000	380		1.12	mg/Kg	633		1.19	mg/Kg	296		1.11	mg/Kg	584		1.07	mg/Kg
Nickel	30	310	130	12.3		3.37	mg/Kg	22.5		1.19	mg/Kg	11.4		1.11	mg/Kg	16.1		1.07	mg/Kg
Potassium	SB	NA	NA	507		1.12	mg/Kg	1260		3.56	mg/Kg	541		3.32	mg/Kg	1010		3.21	mg/Kg
Selenium	3.9	1,500	4	ND		1.12	mg/Kg	ND		1.19	mg/Kg	ND		1.11	mg/Kg	ND		1.07	mg/Kg
Silver	2	1,500	8.3	ND		5.61	mg/Kg	ND		1.19	mg/Kg	ND		1.11	mg/Kg	ND		1.07	mg/Kg
Sodium	SB	NA	NA	21.4		1.12	mg/Kg	134		5.94	mg/Kg	114		5.53	mg/Kg	126		5.36	mg/Kg
Thallium	SB	NA	NA	ND		2.24	mg/Kg	ND		1.19	mg/Kg	ND		1.11	mg/Kg	ND		1.07	mg/Kg
Vanadium	150 or SB	NA	NA	11.4		2.24	mg/Kg	10.1		2.38	mg/Kg	10.8		2.21	mg/Kg	6.28		2.14	mg/Kg
Zinc	109	10,000	2,480	78.2		11	mg/Kg	69		2.38	mg/Kg	54.2		2.21	mg/Kg	55.5		2.14	mg/Kg
Other Parameters																			
Cyanide	27	27	40	ND		1	mg/kg	ND		1	mg/kg	ND		1	mg/kg	ND		1	mg/kg

Shaded values indicate a Track 1 SCO exceedance
NA - Not Applicable
N/A - Not Analyzed
ND - Not Detected
SB - Soil Background
RL - Laboratory Reporting Limit

TABLE 2 - EXCEEDANCES OF SOIL/FILL SCOs
CONCORD HOTEL AND RESORT
TOWN OF THOMPSON, NEW YORK
NYSDEC BCP No. C353008
SESI CONSULTING ENGINEERS PROJECT # 7180

TestName	Unrestricted Track 1 SCO (ug/kg)	Protection of Public Health Commercial (ug/kg)	Protection of Groundwater (ug/kg)	OU-1A-3A Z0823203 8/19/08				OU-1A-3B Z0823204 8/19/08				OU-1A-5A Z0823205 8/19/08				OU-1A-6A Z0823206 8/19/08			
				Result	Flg	RL	Units	Result	Flg	RL	Units	Result	Flg	RL	Units	Result	Flg	RL	Units
Volatile Organics																			
1,1,1-Trichloroethane	680	500,000	680	ND		1.3	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg
1,1,2,2-Tetrachloroethane	600	NA	NA	ND		1.3	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg
1,1,2-Trichloroethane	NA	NA	NA	ND		1.3	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg
1,1,2-Trichlorotrifluoroethane	6,000	NA	NA	ND		1.3	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg
1,1-Dichloroethane	270	240,000	270	ND		1.3	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg
1,1-Dichloroethene	330	500,000	330	ND		1.3	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg
1,2-Dibromo-3-chloropropane	NA	NA	NA	ND		1.3	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg
1,2-Dibromoethane	NA	NA	NA	ND		1.3	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg
1,2-Dichlorobenzene	1,100	500,000	1,100	ND		1.3	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg
1,2-Dichloroethane	20	30,000	20	ND		1.3	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg
1,2-Dichloropropane	NA	NA	NA	ND		1.3	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg
1,3-Dichlorobenzene	2,400	280,000	2,400	ND		1.3	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg
1,4-Dichlorobenzene	1,800	130,000	1,800	ND		1.3	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg
2-Butanone	120	NA	NA	ND		6.4	ug/kg	ND		6.2	ug/kg	ND		6.2	ug/kg	ND		6	ug/kg
2-Hexanone	NA	NA	NA	ND		6.4	ug/kg	ND		6.2	ug/kg	ND		6.2	ug/kg	ND		6	ug/kg
4-Methyl-2-pentanone	1,000	NA	NA	ND		6.4	ug/kg	ND		6.2	ug/kg	ND		6.2	ug/kg	ND		6	ug/kg
Acetone	50	500,000	50	ND		32	ug/kg	ND		31	ug/kg	ND		31	ug/kg	ND		30	ug/kg
Benzene	60	44,000	60	ND		1.3	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg
Bromodichloromethane	NA	NA	NA	ND		1.3	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg
Bromoform	NA	NA	NA	ND		1.3	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg
Bromomethane	NA	NA	NA	ND		1.3	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg
Carbon Disulfide	2,700	NA	NA	ND		1.3	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg
Carbon Tetrachloride	760	22,000	760	ND		1.3	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg
Chlorobenzene	1,100	500,000	1,100	ND		1.3	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg
Chloroethane	1,900	NA	NA	ND		1.3	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg
Chloroform	370	350,000	370	ND		1.3	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg
Chloromethane	NA	NA	NA	ND		1.3	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg
cis-1,2-Dichloroethene	250	NA	NA	ND		1.3	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg
cis-1,3-Dichloropropene	NA	NA	NA	ND		1.3	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg
Cyclohexane	NA	NA	NA	ND		1.3	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg
Dibromochloromethane	NA	NA	NA	ND		1.3	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg
Dichlorodifluoromethane	NA	NA	NA	ND		13	ug/kg	ND		12	ug/kg	ND		12	ug/kg	ND		12	ug/kg
Ethylbenzene	1,000	390,000	1,000	ND		1.3	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg
Isopropylbenzene	NA	NA	NA	ND		1.3	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg
m&p-Xylenes	260	NA	NA	ND		2.6	ug/kg	ND		2.5	ug/kg	ND		2.5	ug/kg	ND		2.4	ug/kg
Methylcyclohexane	NA	NA	NA	ND		1.3	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg
Methylene Chloride	50	500,000	50	ND		1.3	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg
Methyl-tert-butyl Ether	930	NA	NA	ND		1.3	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg
o-Xylene	260	NA	NA	ND		1.3	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg
Styrene	NA	NA	NA	ND		1.3	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg
tert-Butyl Alcohol	NA	NA	NA	ND		6.4	ug/kg	ND		6.2	ug/kg	ND		6.2	ug/kg	ND		6	ug/kg
Tetrachloroethene	1,300	150,000	1,300	ND		1.3	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg
Toluene	700	500,000	700	ND		1.3	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg
trans-1,2-Dichloroethene	190	NA	NA	ND		1.3	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg
trans-1,3-Dichloropropene	NA	NA	NA	ND		1.3	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg
Trichloroethene	470	200,000	470	ND		1.3	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg
Trichlorofluoromethane	NA	NA	NA	ND		1.3	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg
Vinyl Chloride	20	13,000	20	ND		1.3	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg

Shaded values indicate a Track 1 SCO exceedance
NA - Not Applicable
N/A - Not Analyzed
ND - Not Detected
SB - Soil Background
RL - Laboratory Reporting Limit

TABLE 2 - EXCEEDANCES OF SOIL/FILL SCOs
CONCORD HOTEL AND RESORT
TOWN OF THOMPSON, NEW YORK
NYSDEC BCP No. C353008
SESI CONSULTING ENGINEERS PROJECT # 7180

TestName	Unrestricted Track 1 SCO (ug/kg)	Protection of Public Health Commercial (ug/kg)	Protection of Groundwater (ug/kg)	OU-1A-3A Z0823203 8/19/08				OU-1A-3B Z0823204 8/19/08				OU-1A-5A Z0823205 8/19/08				OU-1A-6A Z0823206 8/19/08			
				Result	Flg	RL	Units	Result	Flg	RL	Units	Result	Flg	RL	Units	Result	Flg	RL	Units
Semi Volatile Organics																			
(3 & 4)-Methylphenol	330	NA	NA	ND		61	ug/kg	ND		64	ug/kg	ND		56	ug/kg	ND		68	ug/kg
1,2,4-Trichlorobenzene	3,400	NA	NA	ND		61	ug/kg	ND		64	ug/kg	ND		56	ug/kg	ND		68	ug/kg
2,4,5-Trichlorophenol	100	NA	NA	ND		61	ug/kg	ND		64	ug/kg	ND		56	ug/kg	ND		68	ug/kg
2,4,6-Trichlorophenol	NA	NA	NA	ND		61	ug/kg	ND		64	ug/kg	ND		56	ug/kg	ND		68	ug/kg
2,4-Dichlorophenol	400	NA	NA	ND		61	ug/kg	ND		64	ug/kg	ND		56	ug/kg	ND		68	ug/kg
2,4-Dimethylphenol	NA	NA	NA	ND		61	ug/kg	ND		64	ug/kg	ND		56	ug/kg	ND		68	ug/kg
2,4-Dinitrophenol	200	NA	NA	ND		1,200	ug/kg	ND		1,300	ug/kg	ND		1,100	ug/kg	ND		1,400	ug/kg
2,4-Dinitrotoluene	NA	NA	NA	ND		61	ug/kg	ND		64	ug/kg	ND		56	ug/kg	ND		68	ug/kg
2,6-Dinitrotoluene	1,000	NA	NA	ND		61	ug/kg	ND		64	ug/kg	ND		56	ug/kg	ND		68	ug/kg
2-Chloronaphthalene	NA	NA	NA	ND		61	ug/kg	ND		64	ug/kg	ND		56	ug/kg	ND		68	ug/kg
2-Chlorophenol	800	NA	NA	ND		61	ug/kg	ND		64	ug/kg	ND		56	ug/kg	ND		68	ug/kg
2-Methyl-4,6-dinitrophenol	NA	NA	NA	ND		1,200	ug/kg	ND		1,300	ug/kg	ND		1,100	ug/kg	ND		1,400	ug/kg
2-Methylnaphthalene	36,400	NA	NA	ND		61	ug/kg	ND		64	ug/kg	ND		56	ug/kg	ND		68	ug/kg
2-Methylphenol	330	NA	NA	ND		61	ug/kg	ND		64	ug/kg	ND		56	ug/kg	ND		68	ug/kg
2-Nitroaniline	430	NA	NA	ND		61	ug/kg	ND		64	ug/kg	ND		56	ug/kg	ND		68	ug/kg
2-Nitrophenol	330	NA	NA	ND		61	ug/kg	ND		64	ug/kg	ND		56	ug/kg	ND		68	ug/kg
3,3'-Dichlorobenzidine	NA	NA	NA	ND		61	ug/kg	ND		64	ug/kg	ND		56	ug/kg	ND		68	ug/kg
3-Nitroaniline	500	NA	NA	ND		61	ug/kg	ND		64	ug/kg	ND		56	ug/kg	ND		68	ug/kg
4-Bromophenyl-phenylether	NA	NA	NA	ND		61	ug/kg	ND		64	ug/kg	ND		56	ug/kg	ND		68	ug/kg
4-Chloro-3-methylphenol	240	NA	NA	ND		61	ug/kg	ND		64	ug/kg	ND		56	ug/kg	ND		68	ug/kg
4-Chloroaniline	220	NA	NA	ND		61	ug/kg	ND		64	ug/kg	ND		56	ug/kg	ND		68	ug/kg
4-Chlorophenyl-phenylether	NA	NA	NA	ND		61	ug/kg	ND		64	ug/kg	ND		56	ug/kg	ND		68	ug/kg
4-Nitroaniline	NA	NA	NA	ND		61	ug/kg	ND		64	ug/kg	ND		56	ug/kg	ND		68	ug/kg
4-Nitrophenol	100	NA	NA	ND		61	ug/kg	ND		64	ug/kg	ND		56	ug/kg	ND		68	ug/kg
Acenaphthene	20,000	500,000	98,000	ND		61	ug/kg	ND		64	ug/kg	ND		56	ug/kg	ND		68	ug/kg
Acenaphthylene	100,000	500,000	107,000	ND		61	ug/kg	ND		64	ug/kg	ND		56	ug/kg	ND		68	ug/kg
Aniline	100	NA	NA	ND		61	ug/kg	ND		64	ug/kg	ND		56	ug/kg	ND		68	ug/kg
Anthracene	100,000	500,000	1,000,000	ND		61	ug/kg	ND		64	ug/kg	ND		56	ug/kg	ND		68	ug/kg
Benzo(a)anthracene	1,000	5,600	1,000	ND		61	ug/kg	ND		64	ug/kg	ND		56	ug/kg	ND		68	ug/kg
Benzo(a)pyrene	1,000	1,000	22,000	ND		61	ug/kg	ND		64	ug/kg	ND		56	ug/kg	ND		68	ug/kg
Benzo(b)fluoranthene	1,000	5,600	1,700	ND		61	ug/kg	ND		64	ug/kg	ND		56	ug/kg	ND		68	ug/kg
Benzo(g,h,i)perylene	100,000	500,000	1,000,000	ND		61	ug/kg	ND		64	ug/kg	ND		56	ug/kg	ND		68	ug/kg
Benzo(k)fluoranthene	800	56,000	1,700	ND		61	ug/kg	ND		64	ug/kg	ND		56	ug/kg	ND		68	ug/kg
bis(2-Chloroethoxy)methane	NA	NA	NA	ND		61	ug/kg	ND		64	ug/kg	ND		56	ug/kg	ND		68	ug/kg
bis(2-Chloroethyl)ether	NA	NA	NA	ND		61	ug/kg	ND		64	ug/kg	ND		56	ug/kg	ND		68	ug/kg
bis(2-Ethylhexyl)phthalate	50,000	NA	NA	ND		120	ug/kg	ND		130	ug/kg	ND		110	ug/kg	270		68	ug/kg
Butylbenzylphthalate	50,000	NA	NA	ND		61	ug/kg	ND		64	ug/kg	ND		56	ug/kg	100		68	ug/kg
Carbazole	NA	NA	NA	ND		61	ug/kg	ND		64	ug/kg	ND		56	ug/kg	ND		68	ug/kg
Chrysene	1,000	56,000	1,000	ND		61	ug/kg	ND		64	ug/kg	ND		56	ug/kg	ND		68	ug/kg
Dibenz(a,h)anthracene	330	560	1,000,000	ND		61	ug/kg	ND		64	ug/kg	ND		56	ug/kg	ND		68	ug/kg

Shaded values indicate a Track 1 SCO exceedance
NA - Not Applicable
N/A - Not Analyzed
ND - Not Detected
SB - Soil Background
RL - Laboratory Reporting Limit

TABLE 2 - EXCEEDANCES OF SOIL/FILL SCOs
CONCORD HOTEL AND RESORT
TOWN OF THOMPSON, NEW YORK
NYSDEC BCP No. C353008
SESI CONSULTING ENGINEERS PROJECT # 7180

TestName	Unrestricted Track 1 SCO (ug/kg)	Protection of Public Health Commercial (ug/kg)	Protection of Groundwater (ug/kg)	OU-1A-3A Z0823203 8/19/08				OU-1A-3B Z0823204 8/19/08				OU-1A-5A Z0823205 8/19/08				OU-1A-6A Z0823206 8/19/08			
				Result	Flg	RL	Units	Result	Flg	RL	Units	Result	Flg	RL	Units	Result	Flg	RL	Units
Dibenzofuran	7,000	NA	NA	ND		61	ug/kg	ND		64	ug/kg	ND		56	ug/kg	ND		68	ug/kg
Diethylphthalate	7,100	NA	NA	ND		61	ug/kg	ND		64	ug/kg	ND		56	ug/kg	ND		68	ug/kg
Dimethylphthalate	2,000	NA	NA	ND		61	ug/kg	ND		64	ug/kg	ND		56	ug/kg	ND		68	ug/kg
Di-n-butylphthalate	8,100	NA	NA	ND		61	ug/kg	ND		64	ug/kg	ND		56	ug/kg	ND		68	ug/kg
Di-n-Octylphthalate	50,000	NA	NA	ND		61	ug/kg	ND		64	ug/kg	ND		56	ug/kg	ND		68	ug/kg
Diphenylamine	NA	NA	NA	ND		61	ug/kg	ND		64	ug/kg	ND		56	ug/kg	ND		68	ug/kg
Fluoranthene	100,000	500,000	1,000,000	ND		61	ug/kg	ND		64	ug/kg	ND		56	ug/kg	ND		68	ug/kg
Fluorene	30,000	500,000	386,000	ND		61	ug/kg	ND		64	ug/kg	ND		56	ug/kg	ND		68	ug/kg
Hexachlorobenzene	330	6,000	3,200	ND		61	ug/kg	ND		64	ug/kg	ND		56	ug/kg	ND		68	ug/kg
Hexachlorobutadiene	NA	NA	NA	ND		61	ug/kg	ND		64	ug/kg	ND		56	ug/kg	ND		68	ug/kg
Hexachlorocyclopentadiene	NA	NA	NA	ND		61	ug/kg	ND		64	ug/kg	ND		56	ug/kg	ND		68	ug/kg
Hexachloroethane	NA	NA	NA	ND		61	ug/kg	ND		64	ug/kg	ND		56	ug/kg	ND		68	ug/kg
Indeno(1,2,3-cd)pyrene	500	5,600	8,200	ND		61	ug/kg	ND		64	ug/kg	ND		56	ug/kg	ND		68	ug/kg
Isophorone	4,400	NA	NA	ND		61	ug/kg	ND		64	ug/kg	ND		56	ug/kg	ND		68	ug/kg
Naphthalene	12,000	500,000	12,000	ND		61	ug/kg	ND		64	ug/kg	ND		56	ug/kg	ND		68	ug/kg
Nitrobenzene	200	NA	NA	ND		61	ug/kg	ND		64	ug/kg	ND		56	ug/kg	ND		68	ug/kg
n-Nitroso-di-n-propylamine	NA	NA	NA	ND		61	ug/kg	ND		64	ug/kg	ND		56	ug/kg	ND		68	ug/kg
Pentachlorophenol	800	6,700	800	ND		61	ug/kg	ND		64	ug/kg	ND		56	ug/kg	ND		68	ug/kg
Phenanthrene	100,000	500,000	1,000,000	ND		61	ug/kg	ND		64	ug/kg	ND		56	ug/kg	ND		68	ug/kg
Phenol	330	500,000	330	ND		61	ug/kg	ND		64	ug/kg	ND		56	ug/kg	ND		68	ug/kg
Pyrene	100,000	500,000	1,000,000	ND		61	ug/kg	ND		64	ug/kg	ND		56	ug/kg	ND		68	ug/kg
TPH	NA	NA	NA	ND		98,000	ug/kg	ND		100,000	ug/kg	ND		89,000	ug/kg	ND		110,000	ug/kg
Pesticides																			
4,4'-DDD	3.3	92,000	14,000	ND		2.4	ug/kg	ND		2.6	ug/kg	ND		2.2	ug/kg	ND		2.7	ug/kg
4,4'-DDE	3.3	62,000	17,000	ND		2.4	ug/kg	ND		2.6	ug/kg	ND		2.2	ug/kg	3.3		2.7	ug/kg
4,4'-DDT	3.3	47,000	136,000	ND		2.4	ug/kg	ND		2.6	ug/kg	ND		2.2	ug/kg	29		2.7	ug/kg
Aldrin	5	680	190	ND		2.4	ug/kg	ND		2.6	ug/kg	ND		2.2	ug/kg	ND		2.7	ug/kg
alpha-BHC	20	3,400	20	ND		4.9	ug/kg	ND		5.1	ug/kg	ND		4.5	ug/kg	ND		5.4	ug/kg
alpha-Chlordane	94	24,000	2,900	ND		4.9	ug/kg	ND		5.1	ug/kg	ND		4.5	ug/kg	ND		5.4	ug/kg
beta-BHC	36	3,000	90	ND		4.9	ug/kg	ND		5.1	ug/kg	ND		4.5	ug/kg	ND		5.4	ug/kg
delta-BHC	40	500,000	250	ND		4.9	ug/kg	ND		5.1	ug/kg	ND		4.5	ug/kg	ND		5.4	ug/kg
Dieldrin	5	1,400	100	ND		2.4	ug/kg	ND		2.6	ug/kg	ND		2.2	ug/kg	ND		2.7	ug/kg
Endosulfan I	2,400	200,000	102,000	ND		20	ug/kg	ND		20	ug/kg	ND		18	ug/kg	ND		22	ug/kg
Endosulfan II	2,400	200,000	102,000	ND		20	ug/kg	ND		20	ug/kg	ND		18	ug/kg	ND		22	ug/kg
Endosulfan sulfate	2,400	200,000	1,000,000	ND		20	ug/kg	ND		20	ug/kg	ND		18	ug/kg	ND		22	ug/kg
Endrin	14	89,000	60	ND		4.9	ug/kg	ND		5.1	ug/kg	ND		4.5	ug/kg	ND		5.4	ug/kg
Endrin aldehyde	NA	NA	NA	ND		20	ug/kg	ND		20	ug/kg	ND		18	ug/kg	ND		22	ug/kg
Endrin ketone	NA	NA	NA	ND		20	ug/kg	ND		20	ug/kg	ND		18	ug/kg	ND		22	ug/kg
gamma-BHC	100	NA	NA	ND		4.9	ug/kg	ND		5.1	ug/kg	ND		4.5	ug/kg	ND		5.4	ug/kg
gamma-Chlordane	94	NA	NA	ND		4.9	ug/kg	ND		5.1	ug/kg	ND		4.5	ug/kg	ND		5.4	ug/kg
Heptachlor	42	15,000	380	ND		4.9	ug/kg	ND		5.1	ug/kg	ND		4.5	ug/kg	ND		5.4	ug/kg
Heptachlor epoxide	20	NA	NA	ND		4.9	ug/kg	ND		5.1	ug/kg	ND		4.5	ug/kg	ND		5.4	ug/kg
Methoxychlor	10,000	NA	NA	ND		20	ug/kg	ND		20	ug/kg	ND		18	ug/kg	ND		22	ug/kg

Shaded values indicate a Track 1 SCO exceedance
NA - Not Applicable
N/A - Not Analyzed
ND - Not Detected
SB - Soil Background
RL - Laboratory Reporting Limit

TABLE 2 - EXCEEDANCES OF SOIL/FILL SCOs
CONCORD HOTEL AND RESORT
TOWN OF THOMPSON, NEW YORK
NYSDEC BCP No. C353008
SESI CONSULTING ENGINEERS PROJECT # 7180

TestName	Unrestricted Track 1 SCO (ug/kg)	Protection of Public Health Commercial (ug/kg)	Protection of Groundwater (ug/kg)	OU-1A-3A Z0823203 8/19/08				OU-1A-3B Z0823204 8/19/08				OU-1A-5A Z0823205 8/19/08				OU-1A-6A Z0823206 8/19/08			
				Result	Flg	RL	Units	Result	Flg	RL	Units	Result	Flg	RL	Units	Result	Flg	RL	Units
PCB's																			
Aroclor 1221-1	100	1,000	3,200	ND		61	ug/kg	ND		64	ug/kg	ND		56	ug/kg	ND		68	ug/kg
Aroclor 1221-2	100	1,000	3,200	ND		61	ug/kg	ND		64	ug/kg	ND		56	ug/kg	ND		68	ug/kg
Aroclor 1221-3	100	1,000	3,200	ND		61	ug/kg	ND		64	ug/kg	ND		56	ug/kg	ND		68	ug/kg
Aroclor 1232-1	100	1,000	3,200	ND		61	ug/kg	ND		64	ug/kg	ND		56	ug/kg	ND		68	ug/kg
Aroclor 1232-2	100	1,000	3,200	ND		61	ug/kg	ND		64	ug/kg	ND		56	ug/kg	ND		68	ug/kg
Aroclor 1232-3	100	1,000	3,200	ND		61	ug/kg	ND		64	ug/kg	ND		56	ug/kg	ND		68	ug/kg
Aroclor 1242-1	100	1,000	3,200	ND		61	ug/kg	ND		64	ug/kg	ND		56	ug/kg	ND		68	ug/kg
Aroclor 1242-2	100	1,000	3,200	ND		61	ug/kg	ND		64	ug/kg	ND		56	ug/kg	ND		68	ug/kg
Aroclor 1242-3	100	1,000	3,200	ND		61	ug/kg	ND		64	ug/kg	ND		56	ug/kg	ND		68	ug/kg
Aroclor 1248-1	100	1,000	3,200	ND		61	ug/kg	ND		64	ug/kg	ND		56	ug/kg	ND		68	ug/kg
Aroclor 1248-2	100	1,000	3,200	ND		61	ug/kg	ND		64	ug/kg	ND		56	ug/kg	ND		68	ug/kg
Aroclor 1248-3	100	1,000	3,200	ND		61	ug/kg	ND		64	ug/kg	ND		56	ug/kg	ND		68	ug/kg
Aroclor 1254-1	100	1,000	3,200	ND		61	ug/kg	ND		64	ug/kg	ND		56	ug/kg	ND		68	ug/kg
Aroclor 1254-2	100	1,000	3,200	ND		61	ug/kg	ND		64	ug/kg	ND		56	ug/kg	ND		68	ug/kg
Aroclor 1254-3	100	1,000	3,200	ND		61	ug/kg	ND		64	ug/kg	ND		56	ug/kg	ND		68	ug/kg
Aroclor 1016-1	100	1,000	3,200	ND		61	ug/kg	ND		64	ug/kg	ND		56	ug/kg	ND		68	ug/kg
Aroclor 1016-2	100	1,000	3,200	ND		61	ug/kg	ND		64	ug/kg	ND		56	ug/kg	ND		68	ug/kg
Aroclor 1016-3	100	1,000	3,200	ND		61	ug/kg	ND		64	ug/kg	ND		56	ug/kg	ND		68	ug/kg
Aroclor 1260-1	100	1,000	3,200	ND		61	ug/kg	ND		64	ug/kg	ND		56	ug/kg	ND		68	ug/kg
Aroclor 1260-2	100	1,000	3,200	ND		61	ug/kg	ND		64	ug/kg	ND		56	ug/kg	ND		68	ug/kg
Aroclor 1260-3	100	1,000	3,200	ND		61	ug/kg	ND		64	ug/kg	ND		56	ug/kg	ND		68	ug/kg
Metals	(mg/kg)	(mg/kg)	(mg/kg)																
Mercury	0.18	2.8	0.18	ND		0.1	mg/Kg	ND		0.1	mg/Kg	ND		0.1	mg/Kg	ND		0.1	mg/Kg
Aluminum	SB	NA	NA	7530		1.1	mg/Kg	8040		1.06	mg/Kg	7170		1.05	mg/Kg	4830		1.08	mg/Kg
Antimony	SB	NA	NA	ND		1.1	mg/Kg	ND		1.06	mg/Kg	ND		1.05	mg/Kg	ND		1.08	mg/Kg
Arsenic	13	16	16	3.36		1.1	mg/Kg	2.01		1.06	mg/Kg	3.31		1.05	mg/Kg	2.21		1.08	mg/Kg
Barium	350	400	820	27		1.1	mg/Kg	63.5		1.06	mg/Kg	70.5		1.05	mg/Kg	20		1.08	mg/Kg
Beryllium	7.2	590	47	ND		0.548	mg/Kg	ND		0.529	mg/Kg	ND		0.527	mg/Kg	ND		0.541	mg/Kg
Cadmium	2.5	9.3	7.5	ND		0.548	mg/Kg	ND		0.529	mg/Kg	ND		0.527	mg/Kg	ND		0.541	mg/Kg
Calcium	SB	NA	NA	1270		2.19	mg/Kg	1700		2.12	mg/Kg	6150		2.11	mg/Kg	255		2.17	mg/Kg
Chromium	30	1,500	NA	7.48		0.548	mg/Kg	8.95		0.529	mg/Kg	8.39		0.527	mg/Kg	4.97		0.541	mg/Kg
Cobalt	30 or SB	NA	NA	7.49		1.1	mg/Kg	11.5		1.06	mg/Kg	7.48		1.05	mg/Kg	6.62		1.08	mg/Kg
Copper	50	270	1,720	10.2		1.1	mg/Kg	7.57		1.06	mg/Kg	23.7		1.05	mg/Kg	10.5		1.08	mg/Kg
Iron	2,000 or SB	NA	NA	13500		1.1	mg/Kg	16100		1.06	mg/Kg	12900		1.05	mg/Kg	9230		1.08	mg/Kg
Lead	63	1,000	450	6.43		1.1	mg/Kg	3.69		1.06	mg/Kg	40.4		1.05	mg/Kg	5.42		1.08	mg/Kg
Magnesium	SB	NA	NA	2640		2.19	mg/Kg	3840		2.12	mg/Kg	2960		2.11	mg/Kg	2080		2.17	mg/Kg
Manganese	1,600	10,000	2,000	183		1.1	mg/Kg	407		1.06	mg/Kg	365		1.05	mg/Kg	207		1.08	mg/Kg
Nickel	30	310	130	11		1.1	mg/Kg	21.5		1.06	mg/Kg	13.4		1.05	mg/Kg	10.8		1.08	mg/Kg
Potassium	SB	NA	NA	550		3.29	mg/Kg	1000		3.17	mg/Kg	731		3.16	mg/Kg	498		3.25	mg/Kg
Selenium	3.9	1,500	4	ND		1.1	mg/Kg	ND		1.06	mg/Kg	ND		1.05	mg/Kg	ND		1.08	mg/Kg
Silver	2	1,500	8.3	ND		1.1	mg/Kg	ND		1.06	mg/Kg	ND		1.05	mg/Kg	ND		1.08	mg/Kg
Sodium	SB	NA	NA	108		5.48	mg/Kg	115		5.29	mg/Kg	168		5.27	mg/Kg	54		5.41	mg/Kg
Thallium	SB	NA	NA	ND		1.1	mg/Kg	ND		1.06	mg/Kg	ND		1.05	mg/Kg	ND		1.08	mg/Kg
Vanadium	150 or SB	NA	NA	7.92		2.19	mg/Kg	6.76		2.12	mg/Kg	8.12		2.11	mg/Kg	5.18		2.17	mg/Kg
Zinc	109	10,000	2,480	38.7		2.19	mg/Kg	55.9		2.12	mg/Kg	74.5		2.11	mg/Kg	31.2		2.17	mg/Kg
Other Parameters																			
Cyanide	27	27	40	ND		1	mg/kg	ND		1	mg/kg	ND		1	mg/kg	ND		1	mg/kg

Shaded values indicate a Track 1 SCO exceedance
NA - Not Applicable
N/A - Not Analyzed
ND - Not Detected
SB - Soil Background
RL - Laboratory Reporting Limit

TABLE 2 - EXCEEDANCES OF SOIL/FILL SCOs
CONCORD HOTEL AND RESORT
TOWN OF THOMPSON, NEW YORK
NYSDEC BCP No. C353008
SESI CONSULTING ENGINEERS PROJECT # 7180

TestName	Unrestricted Track 1 SCO (ug/kg)	Protection of Public Health Commercial (ug/kg)	Protection of Groundwater (ug/kg)	OU-1A-6B Z0823207 8/19/08				OU-1A-8A Z0823208 8/19/08				OU-1A-8B Z0823209 8/19/08				OU-1A-9A Z0823210 8/19/08			
				Result	Flg	RL	Units	Result	Flg	RL	Units	Result	Flg	RL	Units	Result	Flg	RL	Units
Volatile Organics																			
1,1,1-Trichloroethane	680	500,000	680	ND		1.2	ug/kg	ND		1.3	ug/kg	ND		1.3	ug/kg	ND		1.1	ug/kg
1,1,2,2-Tetrachloroethane	600	NA	NA	ND		1.2	ug/kg	ND		1.3	ug/kg	ND		1.3	ug/kg	ND		1.1	ug/kg
1,1,2-Trichloroethane	NA	NA	NA	ND		1.2	ug/kg	ND		1.3	ug/kg	ND		1.3	ug/kg	ND		1.1	ug/kg
1,1,2-Trichlorotrifluoroethane	6,000	NA	NA	ND		1.2	ug/kg	ND		1.3	ug/kg	ND		1.3	ug/kg	ND		1.1	ug/kg
1,1-Dichloroethane	270	240,000	270	ND		1.2	ug/kg	ND		1.3	ug/kg	ND		1.3	ug/kg	ND		1.1	ug/kg
1,1-Dichloroethene	330	500,000	330	ND		1.2	ug/kg	ND		1.3	ug/kg	ND		1.3	ug/kg	ND		1.1	ug/kg
1,2-Dibromo-3-chloropropane	NA	NA	NA	ND		1.2	ug/kg	ND		1.3	ug/kg	ND		1.3	ug/kg	ND		1.1	ug/kg
1,2-Dibromoethane	NA	NA	NA	ND		1.2	ug/kg	ND		1.3	ug/kg	ND		1.3	ug/kg	ND		1.1	ug/kg
1,2-Dichlorobenzene	1,100	500,000	1,100	ND		1.2	ug/kg	ND		1.3	ug/kg	ND		1.3	ug/kg	ND		1.1	ug/kg
1,2-Dichloroethane	20	30,000	20	ND		1.2	ug/kg	ND		1.3	ug/kg	ND		1.3	ug/kg	ND		1.1	ug/kg
1,2-Dichloropropane	NA	NA	NA	ND		1.2	ug/kg	ND		1.3	ug/kg	ND		1.3	ug/kg	ND		1.1	ug/kg
1,3-Dichlorobenzene	2,400	280,000	2,400	ND		1.2	ug/kg	ND		1.3	ug/kg	ND		1.3	ug/kg	ND		1.1	ug/kg
1,4-Dichlorobenzene	1,800	130,000	1,800	ND		1.2	ug/kg	ND		1.3	ug/kg	ND		1.3	ug/kg	ND		1.1	ug/kg
2-Butanone	120	NA	NA	ND		6.2	ug/kg	ND		6.3	ug/kg	ND		6.3	ug/kg	ND		5.4	ug/kg
2-Hexanone	NA	NA	NA	ND		6.2	ug/kg	ND		6.3	ug/kg	ND		6.3	ug/kg	ND		5.4	ug/kg
4-Methyl-2-pentanone	1,000	NA	NA	ND		6.2	ug/kg	ND		6.3	ug/kg	ND		6.3	ug/kg	ND		5.4	ug/kg
Acetone	50	500,000	50	ND		31	ug/kg	ND		32	ug/kg	ND		32	ug/kg	ND		27	ug/kg
Benzene	60	44,000	60	ND		1.2	ug/kg	ND		1.3	ug/kg	ND		1.3	ug/kg	ND		1.1	ug/kg
Bromodichloromethane	NA	NA	NA	ND		1.2	ug/kg	ND		1.3	ug/kg	ND		1.3	ug/kg	ND		1.1	ug/kg
Bromoform	NA	NA	NA	ND		1.2	ug/kg	ND		1.3	ug/kg	ND		1.3	ug/kg	ND		1.1	ug/kg
Bromomethane	NA	NA	NA	ND		1.2	ug/kg	ND		1.3	ug/kg	ND		1.3	ug/kg	ND		1.1	ug/kg
Carbon Disulfide	2,700	NA	NA	ND		1.2	ug/kg	ND		1.3	ug/kg	ND		1.3	ug/kg	ND		1.1	ug/kg
Carbon Tetrachloride	760	22,000	760	ND		1.2	ug/kg	ND		1.3	ug/kg	ND		1.3	ug/kg	ND		1.1	ug/kg
Chlorobenzene	1,100	500,000	1,100	ND		1.2	ug/kg	ND		1.3	ug/kg	ND		1.3	ug/kg	ND		1.1	ug/kg
Chloroethane	1,900	NA	NA	ND		1.2	ug/kg	ND		1.3	ug/kg	ND		1.3	ug/kg	ND		1.1	ug/kg
Chloroform	370	350,000	370	ND		1.2	ug/kg	ND		1.3	ug/kg	ND		1.3	ug/kg	ND		1.1	ug/kg
Chloromethane	NA	NA	NA	ND		1.2	ug/kg	ND		1.3	ug/kg	ND		1.3	ug/kg	ND		1.1	ug/kg
cis-1,2-Dichloroethene	250	NA	NA	ND		1.2	ug/kg	ND		1.3	ug/kg	ND		1.3	ug/kg	ND		1.1	ug/kg
cis-1,3-Dichloropropene	NA	NA	NA	ND		1.2	ug/kg	ND		1.3	ug/kg	ND		1.3	ug/kg	ND		1.1	ug/kg
Cyclohexane	NA	NA	NA	ND		1.2	ug/kg	ND		1.3	ug/kg	ND		1.3	ug/kg	ND		1.1	ug/kg
Dibromochloromethane	NA	NA	NA	ND		1.2	ug/kg	ND		1.3	ug/kg	ND		1.3	ug/kg	ND		1.1	ug/kg
Dichlorodifluoromethane	NA	NA	NA	ND		12	ug/kg	ND		13	ug/kg	ND		13	ug/kg	ND		11	ug/kg
Ethylbenzene	1,000	390,000	1,000	ND		1.2	ug/kg	ND		1.3	ug/kg	ND		1.3	ug/kg	ND		1.1	ug/kg
Isopropylbenzene	NA	NA	NA	ND		1.2	ug/kg	ND		1.3	ug/kg	ND		1.3	ug/kg	ND		1.1	ug/kg
m&p-Xylenes	260	NA	NA	ND		2.5	ug/kg	ND		2.5	ug/kg	ND		2.5	ug/kg	ND		2.1	ug/kg
Methylcyclohexane	NA	NA	NA	ND		1.2	ug/kg	ND		1.3	ug/kg	ND		1.3	ug/kg	ND		1.1	ug/kg
Methylene Chloride	50	500,000	50	ND		1.2	ug/kg	ND		1.3	ug/kg	ND		1.3	ug/kg	ND		1.1	ug/kg
Methyl-tert-butyl Ether	930	NA	NA	ND		1.2	ug/kg	ND		1.3	ug/kg	ND		1.3	ug/kg	ND		1.1	ug/kg
o-Xylene	260	NA	NA	ND		1.2	ug/kg	ND		1.3	ug/kg	ND		1.3	ug/kg	ND		1.1	ug/kg
Styrene	NA	NA	NA	ND		1.2	ug/kg	ND		1.3	ug/kg	ND		1.3	ug/kg	ND		1.1	ug/kg
tert-Butyl Alcohol	NA	NA	NA	ND		6.2	ug/kg	ND		6.3	ug/kg	ND		6.3	ug/kg	ND		5.4	ug/kg
Tetrachloroethene	1,300	150,000	1,300	ND		1.2	ug/kg	ND		1.3	ug/kg	ND		1.3	ug/kg	ND		1.1	ug/kg
Toluene	700	500,000	700	ND		1.2	ug/kg	ND		1.3	ug/kg	ND		1.3	ug/kg	ND		1.1	ug/kg
trans-1,2-Dichloroethene	190	NA	NA	ND		1.2	ug/kg	ND		1.3	ug/kg	ND		1.3	ug/kg	ND		1.1	ug/kg
trans-1,3-Dichloropropene	NA	NA	NA	ND		1.2	ug/kg	ND		1.3	ug/kg	ND		1.3	ug/kg	ND		1.1	ug/kg
Trichloroethene	470	200,000	470	ND		1.2	ug/kg	ND		1.3	ug/kg	ND		1.3	ug/kg	ND		1.1	ug/kg
Trichlorofluoromethane	NA	NA	NA	ND		1.2	ug/kg	ND		1.3	ug/kg	ND		1.3	ug/kg	6.6		1.1	ug/kg
Vinyl Chloride	20	13,000	20	ND		1.2	ug/kg	ND		1.3	ug/kg	ND		1.3	ug/kg	ND		1.1	ug/kg

Shaded values indicate a Track 1 SCO exceedance
NA - Not Applicable
N/A - Not Analyzed
ND - Not Detected
SB - Soil Background
RL - Laboratory Reporting Limit

TABLE 2 - EXCEEDANCES OF SOIL/FILL SCOs
CONCORD HOTEL AND RESORT
TOWN OF THOMPSON, NEW YORK
NYSDEC BCP No. C353008
SESI CONSULTING ENGINEERS PROJECT # 7180

TestName	Unrestricted Track 1 SCO (ug/kg)	Protection of Public Health Commercial (ug/kg)	Protection of Groundwater (ug/kg)	OU-1A-6B Z0823207 8/19/08				OU-1A-8A Z0823208 8/19/08				OU-1A-8B Z0823209 8/19/08				OU-1A-9A Z0823210 8/19/08			
				Result	Flg	RL	Units	Result	Flg	RL	Units	Result	Flg	RL	Units	Result	Flg	RL	Units
Semi Volatile Organics																			
(3 & 4)-Methylphenol	330	NA	NA	ND		55	ug/kg	ND		65	ug/kg	ND		60	ug/kg	ND		240	ug/kg
1,2,4-Trichlorobenzene	3,400	NA	NA	ND		55	ug/kg	ND		65	ug/kg	ND		60	ug/kg	ND		240	ug/kg
2,4,5-Trichlorophenol	100	NA	NA	ND		55	ug/kg	ND		65	ug/kg	ND		60	ug/kg	ND		240	ug/kg
2,4,6-Trichlorophenol	NA	NA	NA	ND		55	ug/kg	ND		65	ug/kg	ND		60	ug/kg	ND		240	ug/kg
2,4-Dichlorophenol	400	NA	NA	ND		55	ug/kg	ND		65	ug/kg	ND		60	ug/kg	ND		240	ug/kg
2,4-Dimethylphenol	NA	NA	NA	ND		55	ug/kg	ND		65	ug/kg	ND		60	ug/kg	ND		240	ug/kg
2,4-Dinitrophenol	200	NA	NA	ND		1,100	ug/kg	ND		1,300	ug/kg	ND		1,200	ug/kg	ND		4,800	ug/kg
2,4-Dinitrotoluene	NA	NA	NA	ND		55	ug/kg	ND		65	ug/kg	ND		60	ug/kg	ND		240	ug/kg
2,6-Dinitrotoluene	1,000	NA	NA	ND		55	ug/kg	ND		65	ug/kg	ND		60	ug/kg	ND		240	ug/kg
2-Chloronaphthalene	NA	NA	NA	ND		55	ug/kg	ND		65	ug/kg	ND		60	ug/kg	ND		240	ug/kg
2-Chlorophenol	800	NA	NA	ND		55	ug/kg	ND		65	ug/kg	ND		60	ug/kg	ND		240	ug/kg
2-Methyl-4,6-dinitrophenol	NA	NA	NA	ND		1,100	ug/kg	ND		1,300	ug/kg	ND		1,200	ug/kg	ND		4,800	ug/kg
2-Methylnaphthalene	36,400	NA	NA	ND		55	ug/kg	ND		65	ug/kg	ND		60	ug/kg	470		240	ug/kg
2-Methylphenol	330	NA	NA	ND		55	ug/kg	ND		65	ug/kg	ND		60	ug/kg	ND		240	ug/kg
2-Nitroaniline	430	NA	NA	ND		55	ug/kg	ND		65	ug/kg	ND		60	ug/kg	ND		240	ug/kg
2-Nitrophenol	330	NA	NA	ND		55	ug/kg	ND		65	ug/kg	ND		60	ug/kg	ND		240	ug/kg
3,3'-Dichlorobenzidine	NA	NA	NA	ND		55	ug/kg	ND		65	ug/kg	ND		60	ug/kg	ND		240	ug/kg
3-Nitroaniline	500	NA	NA	ND		55	ug/kg	ND		65	ug/kg	ND		60	ug/kg	ND		240	ug/kg
4-Bromophenyl-phenylether	NA	NA	NA	ND		55	ug/kg	ND		65	ug/kg	ND		60	ug/kg	ND		240	ug/kg
4-Chloro-3-methylphenol	240	NA	NA	ND		55	ug/kg	ND		65	ug/kg	ND		60	ug/kg	ND		240	ug/kg
4-Chloroaniline	220	NA	NA	ND		55	ug/kg	ND		65	ug/kg	ND		60	ug/kg	ND		240	ug/kg
4-Chlorophenyl-phenylether	NA	NA	NA	ND		55	ug/kg	ND		65	ug/kg	ND		60	ug/kg	ND		240	ug/kg
4-Nitroaniline	NA	NA	NA	ND		55	ug/kg	ND		65	ug/kg	ND		60	ug/kg	ND		240	ug/kg
4-Nitrophenol	100	NA	NA	ND		55	ug/kg	ND		65	ug/kg	ND		60	ug/kg	ND		240	ug/kg
Acenaphthene	20,000	500,000	98,000	ND		55	ug/kg	ND		65	ug/kg	ND		60	ug/kg	3100		240	ug/kg
Acenaphthylene	100,000	500,000	107,000	ND		55	ug/kg	ND		65	ug/kg	190		60	ug/kg	ND		240	ug/kg
Aniline	100	NA	NA	ND		55	ug/kg	ND		65	ug/kg	ND		60	ug/kg	ND		240	ug/kg
Anthracene	100,000	500,000	1,000,000	ND		55	ug/kg	ND		65	ug/kg	200		60	ug/kg	4,500		240	ug/kg
Benzo(a)anthracene	1,000	5,600	1,000	ND		55	ug/kg	ND		65	ug/kg	500		60	ug/kg	8,100		240	ug/kg
Benzo(a)pyrene	1,000	1,000	22,000	ND		55	ug/kg	ND		65	ug/kg	320		60	ug/kg	6,500		240	ug/kg
Benzo(b)fluoranthene	1,000	5,600	1,700	ND		55	ug/kg	ND		65	ug/kg	360		60	ug/kg	10,000		240	ug/kg
Benzo(g,h,i)perylene	100,000	500,000	1,000,000	ND		55	ug/kg	ND		65	ug/kg	120		60	ug/kg	1,500		240	ug/kg
Benzo(k)fluoranthene	800	56,000	1,700	ND		55	ug/kg	ND		65	ug/kg	150		60	ug/kg	5,300		240	ug/kg
bis(2-Chloroethoxy)methane	NA	NA	NA	ND		55	ug/kg	ND		65	ug/kg	ND		60	ug/kg	ND		240	ug/kg
bis(2-Chloroethyl)ether	NA	NA	NA	ND		55	ug/kg	ND		65	ug/kg	ND		60	ug/kg	ND		240	ug/kg
bis(2-Ethylhexyl)phthalate	50,000	NA	NA	ND		110	ug/kg	ND		130	ug/kg	ND		60	ug/kg	1,000		240	ug/kg
Butylbenzylphthalate	50,000	NA	NA	ND		55	ug/kg	ND		65	ug/kg	ND		60	ug/kg	ND		390	ug/kg
Carbazole	NA	NA	NA	ND		55	ug/kg	ND		65	ug/kg	ND		60	ug/kg	2,400		240	ug/kg
Chrysene	1,000	56,000	1,000	ND		55	ug/kg	ND		65	ug/kg	640		60	ug/kg	7,500		240	ug/kg
Dibenz(a,h)anthracene	330	560	1,000,000	ND		55	ug/kg	ND		65	ug/kg	ND		60	ug/kg	ND		240	ug/kg

Shaded values indicate a Track 1 SCO exceedance
NA - Not Applicable
N/A - Not Analyzed
ND - Not Detected
SB - Soil Background
RL - Laboratory Reporting Limit

TABLE 2 - EXCEEDANCES OF SOIL/FILL SCOs
CONCORD HOTEL AND RESORT
TOWN OF THOMPSON, NEW YORK
NYSDEC BCP No. C353008
SESI CONSULTING ENGINEERS PROJECT # 7180

TestName	Unrestricted Track 1 SCO (ug/kg)	Protection of Public Health Commercial (ug/kg)	Protection of Groundwater (ug/kg)	OU-1A-6B Z0823207 8/19/08				OU-1A-8A Z0823208 8/19/08				OU-1A-8B Z0823209 8/19/08				OU-1A-9A Z0823210 8/19/08			
				Result	Flg	RL	Units	Result	Flg	RL	Units	Result	Flg	RL	Units	Result	Flg	RL	Units
Dibenzofuran	7,000	NA	NA	ND		55	ug/kg	ND		65	ug/kg	ND		60	ug/kg	1,400		240	ug/kg
Diethylphthalate	7,100	NA	NA	ND		55	ug/kg	ND		65	ug/kg	ND		60	ug/kg	ND		240	ug/kg
Dimethylphthalate	2,000	NA	NA	ND		55	ug/kg	ND		65	ug/kg	ND		60	ug/kg	ND		240	ug/kg
Di-n-butylphthalate	8,100	NA	NA	ND		55	ug/kg	ND		65	ug/kg	ND		60	ug/kg	ND		240	ug/kg
Di-n-Octylphthalate	50,000	NA	NA	ND		55	ug/kg	ND		65	ug/kg	ND		60	ug/kg	410		240	ug/kg
Diphenylamine	NA	NA	NA	ND		55	ug/kg	ND		65	ug/kg	ND		60	ug/kg	ND		240	ug/kg
Fluoranthene	100,000	500,000	1,000,000	ND		55	ug/kg	ND		65	ug/kg	880		60	ug/kg	26,000		240	ug/kg
Fluorene	30,000	500,000	386,000	ND		55	ug/kg	ND		65	ug/kg	81		60	ug/kg	2,000		240	ug/kg
Hexachlorobenzene	330	6,000	3,200	ND		55	ug/kg	ND		65	ug/kg	ND		60	ug/kg	ND		240	ug/kg
Hexachlorobutadiene	NA	NA	NA	ND		55	ug/kg	ND		65	ug/kg	ND		60	ug/kg	ND		240	ug/kg
Hexachlorocyclopentadiene	NA	NA	NA	ND		55	ug/kg	ND		65	ug/kg	ND		60	ug/kg	ND		240	ug/kg
Hexachloroethane	NA	NA	NA	ND		55	ug/kg	ND		65	ug/kg	ND		60	ug/kg	ND		240	ug/kg
Indeno(1,2,3-cd)pyrene	500	5,600	8,200	ND		55	ug/kg	ND		65	ug/kg	100		100	ug/kg	1,700		240	ug/kg
Isophorone	4,400	NA	NA	ND		55	ug/kg	ND		65	ug/kg	ND		60	ug/kg	ND		240	ug/kg
Naphthalene	12,000	500,000	12,000	ND		55	ug/kg	ND		65	ug/kg	ND		60	ug/kg	ND		960	ug/kg
Nitrobenzene	200	NA	NA	ND		55	ug/kg	ND		65	ug/kg	ND		60	ug/kg	ND		240	ug/kg
n-Nitroso-di-n-propylamine	NA	NA	NA	ND		55	ug/kg	ND		65	ug/kg	ND		60	ug/kg	ND		240	ug/kg
Pentachlorophenol	800	6,700	800	ND		55	ug/kg	ND		65	ug/kg	ND		60	ug/kg	ND		240	ug/kg
Phenanthrene	100,000	500,000	1,000,000	ND		55	ug/kg	ND		65	ug/kg	930		930	ug/kg	12,000		240	ug/kg
Phenol	330	500,000	330	ND		55	ug/kg	ND		65	ug/kg	ND		60	ug/kg	ND		240	ug/kg
Pyrene	100,000	500,000	1,000,000	ND		55	ug/kg	ND		65	ug/kg	1100		1,100	ug/kg	19,000		240	ug/kg
TPH	NA	NA	NA	ND		87,000	ug/kg	ND		47,000	ug/kg	ND		97,000	ug/kg	470,000		97,000	ug/kg
Pesticides																			
4,4'-DDD	3.3	92,000	14,000	ND		2.2	ug/kg	ND		2.6	ug/kg	ND		2.4	ug/kg	ND		9.7	ug/kg
4,4'-DDE	3.3	62,000	17,000	ND		2.2	ug/kg	ND		2.6	ug/kg	ND		2.4	ug/kg	ND		9.7	ug/kg
4,4'-DDT	3.3	47,000	136,000	ND		2.2	ug/kg	ND		2.6	ug/kg	ND		2.4	ug/kg	ND		9.7	ug/kg
Aldrin	5	680	190	ND		2.2	ug/kg	ND		2.6	ug/kg	ND		2.4	ug/kg	ND		9.7	ug/kg
alpha-BHC	20	3,400	20	ND		4.4	ug/kg	ND		5.2	ug/kg	ND		4.8	ug/kg	ND		19	ug/kg
alpha-Chlordane	94	24,000	2,900	ND		4.4	ug/kg	ND		5.2	ug/kg	ND		4.8	ug/kg	ND		19	ug/kg
beta-BHC	36	3,000	90	ND		4.4	ug/kg	ND		5.2	ug/kg	ND		4.8	ug/kg	ND		19	ug/kg
delta-BHC	40	500,000	250	ND		4.4	ug/kg	ND		5.2	ug/kg	ND		4.8	ug/kg	ND		19	ug/kg
Dieldrin	5	1,400	100	ND		2.2	ug/kg	ND		2.6	ug/kg	ND		2.4	ug/kg	ND		9.7	ug/kg
Endosulfan I	2,400	200,000	102,000	ND		17	ug/kg	ND		21	ug/kg	ND		19	ug/kg	ND		77	ug/kg
Endosulfan II	2,400	200,000	102,000	ND		17	ug/kg	ND		21	ug/kg	ND		19	ug/kg	ND		77	ug/kg
Endosulfan sulfate	2,400	200,000	1,000,000	ND		17	ug/kg	ND		21	ug/kg	ND		19	ug/kg	ND		77	ug/kg
Endrin	14	89,000	60	ND		4.4	ug/kg	ND		5.2	ug/kg	ND		4.8	ug/kg	ND		19	ug/kg
Endrin aldehyde	NA	NA	NA	ND		17	ug/kg	ND		21	ug/kg	ND		19	ug/kg	ND		77	ug/kg
Endrin ketone	NA	NA	NA	ND		17	ug/kg	ND		21	ug/kg	ND		19	ug/kg	ND		77	ug/kg
gamma-BHC	100	NA	NA	ND		4.4	ug/kg	ND		5.2	ug/kg	ND		4.8	ug/kg	ND		19	ug/kg
gamma-Chlordane	94	NA	NA	ND		4.4	ug/kg	ND		5.2	ug/kg	ND		4.8	ug/kg	ND		19	ug/kg
Heptachlor	42	15,000	380	ND		4.4	ug/kg	ND		5.2	ug/kg	ND		4.8	ug/kg	ND		19	ug/kg
Heptachlor epoxide	20	NA	NA	ND		4.4	ug/kg	ND		5.2	ug/kg	ND		4.8	ug/kg	ND		19	ug/kg
Methoxychlor	10,000	NA	NA	ND		17	ug/kg	ND		21	ug/kg	ND		19	ug/kg	ND		77	ug/kg

Shaded values indicate a Track 1 SCO exceedance
NA - Not Applicable
N/A - Not Analyzed
ND - Not Detected
SB - Soil Background
RL - Laboratory Reporting Limit

TABLE 2 - EXCEEDANCES OF SOIL/FILL SCOs
CONCORD HOTEL AND RESORT
TOWN OF THOMPSON, NEW YORK
NYSDEC BCP No. C353008
SESI CONSULTING ENGINEERS PROJECT # 7180

TestName	Unrestricted Track 1 SCO (ug/kg)	Protection of Public Health Commercial (ug/kg)	Protection of Groundwater (ug/kg)	OU-1A-6B Z0823207 8/19/08				OU-1A-8A Z0823208 8/19/08				OU-1A-8B Z0823209 8/19/08				OU-1A-9A Z0823210 8/19/08			
				Result	Flg	RL	Units	Result	Flg	RL	Units	Result	Flg	RL	Units	Result	Flg	RL	Units
PCB's																			
Aroclor 1221-1	100	1,000	3,200	ND		55	ug/kg	ND		65	ug/kg	ND		60	ug/kg	ND		240	ug/kg
Aroclor 1221-2	100	1,000	3,200	ND		55	ug/kg	ND		65	ug/kg	ND		60	ug/kg	ND		240	ug/kg
Aroclor 1221-3	100	1,000	3,200	ND		55	ug/kg	ND		65	ug/kg	ND		60	ug/kg	ND		240	ug/kg
Aroclor 1232-1	100	1,000	3,200	ND		55	ug/kg	ND		65	ug/kg	ND		60	ug/kg	ND		240	ug/kg
Aroclor 1232-2	100	1,000	3,200	ND		55	ug/kg	ND		65	ug/kg	ND		60	ug/kg	ND		240	ug/kg
Aroclor 1232-3	100	1,000	3,200	ND		55	ug/kg	ND		65	ug/kg	ND		60	ug/kg	ND		240	ug/kg
Aroclor 1242-1	100	1,000	3,200	ND		55	ug/kg	ND		65	ug/kg	ND		60	ug/kg	ND		240	ug/kg
Aroclor 1242-2	100	1,000	3,200	ND		55	ug/kg	ND		65	ug/kg	ND		60	ug/kg	ND		240	ug/kg
Aroclor 1242-3	100	1,000	3,200	ND		55	ug/kg	ND		65	ug/kg	ND		60	ug/kg	ND		240	ug/kg
Aroclor 1248-1	100	1,000	3,200	ND		55	ug/kg	ND		65	ug/kg	ND		60	ug/kg	ND		240	ug/kg
Aroclor 1248-2	100	1,000	3,200	ND		55	ug/kg	ND		65	ug/kg	ND		60	ug/kg	ND		240	ug/kg
Aroclor 1248-3	100	1,000	3,200	ND		55	ug/kg	ND		65	ug/kg	ND		60	ug/kg	ND		240	ug/kg
Aroclor 1254-1	100	1,000	3,200	ND		55	ug/kg	ND		65	ug/kg	ND		60	ug/kg	ND		240	ug/kg
Aroclor 1254-2	100	1,000	3,200	ND		55	ug/kg	ND		65	ug/kg	ND		60	ug/kg	ND		240	ug/kg
Aroclor 1254-3	100	1,000	3,200	ND		55	ug/kg	ND		65	ug/kg	ND		60	ug/kg	ND		240	ug/kg
Aroclor 1016-1	100	1,000	3,200	ND		55	ug/kg	ND		65	ug/kg	ND		60	ug/kg	ND		240	ug/kg
Aroclor 1016-2	100	1,000	3,200	ND		55	ug/kg	ND		65	ug/kg	ND		60	ug/kg	ND		240	ug/kg
Aroclor 1016-3	100	1,000	3,200	ND		55	ug/kg	ND		65	ug/kg	ND		60	ug/kg	ND		240	ug/kg
Aroclor 1260-1	100	1,000	3,200	ND		55	ug/kg	ND		65	ug/kg	ND		60	ug/kg	ND		240	ug/kg
Aroclor 1260-2	100	1,000	3,200	ND		55	ug/kg	ND		65	ug/kg	ND		60	ug/kg	ND		240	ug/kg
Aroclor 1260-3	100	1,000	3,200	ND		55	ug/kg	ND		65	ug/kg	ND		60	ug/kg	ND		240	ug/kg
Metals	**(mg/kg)**	**(mg/kg)**	**(mg/kg)**																
Mercury	0.18	2.8	0.18	ND		0.1	mg/Kg	ND		0.1	mg/Kg	ND		0.1	mg/Kg	ND		0.1	mg/Kg
Aluminum	SB	NA	NA	6840		1.09	mg/Kg	8900		1.09	mg/Kg	8470		1.11	mg/Kg	12400		6.94	mg/Kg
Antimony	SB	NA	NA	1.32		1.09	mg/Kg	ND		1.09	mg/Kg	ND		1.11	mg/Kg	ND		6.94	mg/Kg
Arsenic	13	16	16	3.06		1.09	mg/Kg	3.29		1.09	mg/Kg	3.87		1.11	mg/Kg	ND		6.94	mg/Kg
Barium	350	400	820	42.4		1.09	mg/Kg	49.1		1.09	mg/Kg	48.2		1.11	mg/Kg	206		6.94	mg/Kg
Beryllium	7.2	590	47	ND		0.545	mg/Kg	ND		0.545	mg/Kg	ND		0.555	mg/Kg	ND		3.47	mg/Kg
Cadmium	2.5	9.3	7.5	ND		0.545	mg/Kg	ND		0.545	mg/Kg	ND		0.555	mg/Kg	ND		3.47	mg/Kg
Calcium	SB	NA	NA	751		2.18	mg/Kg	1540		2.18	mg/Kg	928		2.22	mg/Kg	103000		13.9	mg/Kg
Chromium	30	1,500	NA	6.54		0.545	mg/Kg	10		0.545	mg/Kg	9.05		0.555	mg/Kg	27.8		3.47	mg/Kg
Cobalt	30 or SB	NA	NA	7.49		1.09	mg/Kg	9.36		1.09	mg/Kg	7.92		1.11	mg/Kg	9.38		6.94	mg/Kg
Copper	50	270	1,720	13		1.09	mg/Kg	15.3		1.09	mg/Kg	17.1		1.11	mg/Kg	126		6.94	mg/Kg
Iron	2,000 or SB	NA	NA	13000		1.09	mg/Kg	17200		1.09	mg/Kg	16600		1.11	mg/Kg	28300		6.94	mg/Kg
Lead	63	1,000	450	5.84		1.09	mg/Kg	51.7		1.09	mg/Kg	16.3		1.11	mg/Kg	48.3		6.94	mg/Kg
Magnesium	SB	NA	NA	2730		2.18	mg/Kg	3410		2.18	mg/Kg	2740		2.22	mg/Kg	11600		13.9	mg/Kg
Manganese	1,600	10,000	2,000	330		1.09	mg/Kg	495		1.09	mg/Kg	524		1.11	mg/Kg	388		6.94	mg/Kg
Nickel	30	310	130	9.52		1.09	mg/Kg	15.3		1.09	mg/Kg	11		1.11	mg/Kg	37.7		6.94	mg/Kg
Potassium	SB	NA	NA	683		3.27	mg/Kg	766		3.27	mg/Kg	654		3.33	mg/Kg	2620		20.8	mg/Kg
Selenium	3.9	1,500	4	ND		1.09	mg/Kg	ND		1.09	mg/Kg	ND		1.11	mg/Kg	ND		6.94	mg/Kg
Silver	2	1,500	8.3	ND		1.09	mg/Kg	ND		1.09	mg/Kg	ND		1.11	mg/Kg	ND		6.94	mg/Kg
Sodium	SB	NA	NA	34.5		5.45	mg/Kg	184		5.45	mg/Kg	164		5.55	mg/Kg	1030		34.7	mg/Kg
Thallium	SB	NA	NA	ND		1.09	mg/Kg	ND		1.09	mg/Kg	ND		1.11	mg/Kg	ND		6.94	mg/Kg
Vanadium	150 or SB	NA	NA	5.45		2.18	mg/Kg	7.5		2.18	mg/Kg	8.57		2.22	mg/Kg	40.1		13.9	mg/Kg
Zinc	109	10,000	2,480	42.2		2.18	mg/Kg	65.1		2.18	mg/Kg	54.5		2.22	mg/Kg	236		13.9	mg/Kg
Other Parameters																			
Cyanide	27	27	40	ND		1	mg/kg	ND		1	mg/kg	ND		1	mg/kg	ND		1	mg/kg

Shaded values indicate a Track 1 SCO exceedance
NA - Not Applicable
N/A - Not Analyzed
ND - Not Detected
SB - Soil Background
RL - Laboratory Reporting Limit

TABLE 2 - EXCEEDANCES OF SOIL/FILL SCOs
CONCORD HOTEL AND RESORT
TOWN OF THOMPSON, NEW YORK
NYSDEC BCP No. C353008
SESI CONSULTING ENGINEERS PROJECT # 7180

TestName	Unrestricted Track 1 SCO (ug/kg)	Protection of Public Health Commercial (ug/kg)	Protection of Groundwater (ug/kg)	OU-1A-9A x4 Z0823210 8/19/08				OU-1A-9ARA Z0823210RA 8/19/08				OU-1A-10A Z0823211 8/19/08				OU-1A-10B Z0823212 8/19/08			
				Result	Flg	RL	Units	Result	Flg	RL	Units	Result	Flg	RL	Units	Result	Flg	RL	Units
Volatile Organics																			
1,1,1-Trichloroethane	680	500,000	680	N/A				ND		1	ug/kg	ND		1.3	ug/kg	ND		1.4	ug/kg
1,1,2,2-Tetrachloroethane	600	NA	NA	N/A				ND		1	ug/kg	ND		1.3	ug/kg	ND		1.4	ug/kg
1,1,2-Trichloroethane	NA	NA	NA	N/A				ND		1	ug/kg	ND		1.3	ug/kg	ND		1.4	ug/kg
1,1,2-Trichlorotrifluoroethane	6,000	NA	NA	N/A				ND		1	ug/kg	ND		1.3	ug/kg	ND		1.4	ug/kg
1,1-Dichloroethane	270	240,000	270	N/A				ND		1	ug/kg	ND		1.3	ug/kg	ND		1.4	ug/kg
1,1-Dichloroethene	330	500,000	330	N/A				ND		1	ug/kg	ND		1.3	ug/kg	ND		1.4	ug/kg
1,2-Dibromo-3-chloropropane	NA	NA	NA	N/A				ND		1	ug/kg	ND		1.3	ug/kg	ND		1.4	ug/kg
1,2-Dibromoethane	NA	NA	NA	N/A				ND		1	ug/kg	ND		1.3	ug/kg	ND		1.4	ug/kg
1,2-Dichlorobenzene	1,100	500,000	1,100	N/A				ND		1	ug/kg	ND		1.3	ug/kg	ND		1.4	ug/kg
1,2-Dichloroethane	20	30,000	20	N/A				ND		1	ug/kg	ND		1.3	ug/kg	ND		1.4	ug/kg
1,2-Dichloropropane	NA	NA	NA	N/A				ND		1	ug/kg	ND		1.3	ug/kg	ND		1.4	ug/kg
1,3-Dichlorobenzene	2,400	280,000	2,400	N/A				ND		1	ug/kg	ND		1.3	ug/kg	ND		1.4	ug/kg
1,4-Dichlorobenzene	1,800	130,000	1,800	N/A				ND		1	ug/kg	ND		1.3	ug/kg	ND		1.4	ug/kg
2-Butanone	120	NA	NA	N/A				ND		5.2	ug/kg	ND		6.3	ug/kg	ND		6.9	ug/kg
2-Hexanone	NA	NA	NA	N/A				ND		5.2	ug/kg	ND		6.3	ug/kg	ND		6.9	ug/kg
4-Methyl-2-pentanone	1,000	NA	NA	N/A				ND		5.2	ug/kg	ND		6.3	ug/kg	ND		6.9	ug/kg
Acetone	50	500,000	50	N/A				ND		26	ug/kg	ND		32	ug/kg	ND		34	ug/kg
Benzene	60	44,000	60	N/A				ND		1	ug/kg	ND		1.3	ug/kg	ND		1.4	ug/kg
Bromodichloromethane	NA	NA	NA	N/A				ND		1	ug/kg	ND		1.3	ug/kg	ND		1.4	ug/kg
Bromoform	NA	NA	NA	N/A				ND		1	ug/kg	ND		1.3	ug/kg	ND		1.4	ug/kg
Bromomethane	NA	NA	NA	N/A				ND		1	ug/kg	ND		1.3	ug/kg	ND		1.4	ug/kg
Carbon Disulfide	2,700	NA	NA	N/A				ND		1	ug/kg	ND		1.3	ug/kg	ND		1.4	ug/kg
Carbon Tetrachloride	760	22,000	760	N/A				ND		1	ug/kg	ND		1.3	ug/kg	ND		1.4	ug/kg
Chlorobenzene	1,100	500,000	1,100	N/A				ND		1	ug/kg	ND		1.3	ug/kg	ND		1.4	ug/kg
Chloroethane	1,900	NA	NA	N/A				ND		1	ug/kg	ND		1.3	ug/kg	ND		1.4	ug/kg
Chloroform	370	350,000	370	N/A				ND		1	ug/kg	ND		1.3	ug/kg	ND		1.4	ug/kg
Chloromethane	NA	NA	NA	N/A				ND		1	ug/kg	ND		1.3	ug/kg	ND		1.4	ug/kg
cis-1,2-Dichloroethene	250	NA	NA	N/A				ND		1	ug/kg	ND		1.3	ug/kg	ND		1.4	ug/kg
cis-1,3-Dichloropropene	NA	NA	NA	N/A				ND		1	ug/kg	ND		1.3	ug/kg	ND		1.4	ug/kg
Cyclohexane	NA	NA	NA	N/A				ND		1	ug/kg	ND		1.3	ug/kg	ND		1.4	ug/kg
Dibromochloromethane	NA	NA	NA	N/A				ND		1	ug/kg	ND		1.3	ug/kg	ND		1.4	ug/kg
Dichlorodifluoromethane	NA	NA	NA	N/A				ND		10	ug/kg	ND		13	ug/kg	ND		14	ug/kg
Ethylbenzene	1,000	390,000	1,000	N/A				ND		1	ug/kg	ND		1.3	ug/kg	ND		1.4	ug/kg
Isopropylbenzene	NA	NA	NA	N/A				ND		1	ug/kg	ND		1.3	ug/kg	ND		1.4	ug/kg
m&p-Xylenes	260	NA	NA	N/A				ND		2.1	ug/kg	ND		2.5	ug/kg	ND		2.7	ug/kg
Methylcyclohexane	NA	NA	NA	N/A				ND		1	ug/kg	ND		1.3	ug/kg	ND		1.4	ug/kg
Methylene Chloride	50	500,000	50	N/A				ND		1	ug/kg	ND		1.3	ug/kg	ND		1.4	ug/kg
Methyl-tert-butyl Ether	930	NA	NA	N/A				ND		1	ug/kg	ND		1.3	ug/kg	ND		1.4	ug/kg
o-Xylene	260	NA	NA	N/A				ND		1	ug/kg	ND		1.3	ug/kg	ND		1.4	ug/kg
Styrene	NA	NA	NA	N/A				ND		1	ug/kg	ND		1.3	ug/kg	ND		1.4	ug/kg
tert-Butyl Alcohol	NA	NA	NA	N/A				ND		5.2	ug/kg	ND		6.3	ug/kg	ND		6.9	ug/kg
Tetrachloroethene	1,300	150,000	1,300	N/A				ND		1	ug/kg	ND		1.3	ug/kg	ND		1.4	ug/kg
Toluene	700	500,000	700	N/A				ND		1	ug/kg	ND		1.3	ug/kg	ND		1.4	ug/kg
trans-1,2-Dichloroethene	190	NA	NA	N/A				ND		1	ug/kg	ND		1.3	ug/kg	ND		1.4	ug/kg
trans-1,3-Dichloropropene	NA	NA	NA	N/A				ND		1	ug/kg	ND		1.3	ug/kg	ND		1.4	ug/kg
Trichloroethene	470	200,000	470	N/A				ND		1	ug/kg	ND		1.3	ug/kg	ND		1.4	ug/kg
Trichlorofluoromethane	NA	NA	NA	N/A				1.2		1	ug/kg	ND		1.3	ug/kg	ND		1.4	ug/kg
Vinyl Chloride	20	13,000	20	N/A				ND		1	ug/kg	ND		1.3	ug/kg	ND		1.4	ug/kg

Shaded values indicate a Track 1 SCO exceedance
NA - Not Applicable
N/A - Not Analyzed
ND - Not Detected
SB - Soil Background
RL - Laboratory Reporting Limit

TABLE 2 - EXCEEDANCES OF SOIL/FILL SCOs
CONCORD HOTEL AND RESORT
TOWN OF THOMPSON, NEW YORK
NYSDEC BCP No. C353008
SESI CONSULTING ENGINEERS PROJECT # 7180

TestName	Unrestricted Track 1 SCO (ug/kg)	Protection of Public Health Commercial (ug/kg)	Protection of Groundwater (ug/kg)	OU-1A-9A x4 Z0823210 8/19/08				OU-1A-9ARA Z0823210RA 8/19/08				OU-1A-10A Z0823211 8/19/08				OU-1A-10B Z0823212 8/19/08			
				Result	Flg	RL	Units	Result	Flg	RL	Units	Result	Flg	RL	Units	Result	Flg	RL	Units
Semi Volatile Organics																			
(3 & 4)-Methylphenol	330	NA	NA	ND		970	ug/kg	N/A				ND		59	ug/kg	ND		48	ug/kg
1,2,4-Trichlorobenzene	3,400	NA	NA	ND		970	ug/kg	N/A				ND		59	ug/kg	ND		48	ug/kg
2,4,5-Trichlorophenol	100	NA	NA	ND		970	ug/kg	N/A				ND		59	ug/kg	ND		48	ug/kg
2,4,6-Trichlorophenol	NA	NA	NA	ND		970	ug/kg	N/A				ND		59	ug/kg	ND		48	ug/kg
2,4-Dichlorophenol	400	NA	NA	ND		970	ug/kg	N/A				ND		59	ug/kg	ND		48	ug/kg
2,4-Dimethylphenol	NA	NA	NA	ND		970	ug/kg	N/A				ND		59	ug/kg	ND		48	ug/kg
2,4-Dinitrophenol	200	NA	NA	ND		19,000	ug/kg	N/A				ND		1200	ug/kg	ND		970	ug/kg
2,4-Dinitrotoluene	NA	NA	NA	ND		970	ug/kg	N/A				ND		59	ug/kg	ND		48	ug/kg
2,6-Dinitrotoluene	1,000	NA	NA	ND		970	ug/kg	N/A				ND		59	ug/kg	ND		48	ug/kg
2-Chloronaphthalene	NA	NA	NA	ND		970	ug/kg	N/A				ND		59	ug/kg	ND		48	ug/kg
2-Chlorophenol	800	NA	NA	ND		970	ug/kg	N/A				ND		59	ug/kg	ND		48	ug/kg
2-Methyl-4,6-dinitrophenol	NA	NA	NA	ND		19,000	ug/kg	N/A				ND		1200	ug/kg	ND		970	ug/kg
2-Methylnaphthalene	36,400	NA	NA	ND		970	ug/kg	N/A				ND		59	ug/kg	ND		48	ug/kg
2-Methylphenol	330	NA	NA	ND		970	ug/kg	N/A				ND		59	ug/kg	ND		48	ug/kg
2-Nitroaniline	430	NA	NA	ND		970	ug/kg	N/A				ND		59	ug/kg	ND		48	ug/kg
2-Nitrophenol	330	NA	NA	ND		970	ug/kg	N/A				ND		59	ug/kg	ND		48	ug/kg
3,3'-Dichlorobenzidine	NA	NA	NA	ND		970	ug/kg	N/A				ND		59	ug/kg	ND		48	ug/kg
3-Nitroaniline	500	NA	NA	ND		970	ug/kg	N/A				ND		59	ug/kg	ND		48	ug/kg
4-Bromophenyl-phenylether	NA	NA	NA	ND		970	ug/kg	N/A				ND		59	ug/kg	ND		48	ug/kg
4-Chloro-3-methylphenol	240	NA	NA	ND		970	ug/kg	N/A				ND		59	ug/kg	ND		48	ug/kg
4-Chloroaniline	220	NA	NA	ND		970	ug/kg	N/A				ND		59	ug/kg	ND		48	ug/kg
4-Chlorophenyl-phenylether	NA	NA	NA	ND		970	ug/kg	N/A				ND		59	ug/kg	ND		48	ug/kg
4-Nitroaniline	NA	NA	NA	ND		970	ug/kg	N/A				ND		59	ug/kg	ND		48	ug/kg
4-Nitrophenol	100	NA	NA	ND		970	ug/kg	N/A				ND		59	ug/kg	ND		48	ug/kg
Acenaphthene	20,000	500,000	98,000	3,100		970	ug/kg	N/A				ND		59	ug/kg	ND		48	ug/kg
Acenaphthylene	100,000	500,000	107,000	ND		970	ug/kg	N/A				ND		59	ug/kg	ND		48	ug/kg
Aniline	100	NA	NA	ND		970	ug/kg	N/A				ND		59	ug/kg	ND		48	ug/kg
Anthracene	100,000	500,000	1,000,000	4,300		970	ug/kg	N/A				ND		59	ug/kg	ND		48	ug/kg
Benzo(a)anthracene	1,000	5,600	1,000	8,700		970	ug/kg	N/A				ND		59	ug/kg	ND		48	ug/kg
Benzo(a)pyrene	1,000	1,000	22,000	6,800		970	ug/kg	N/A				ND		59	ug/kg	ND		48	ug/kg
Benzo(b)fluoranthene	1,000	5,600	1,700	9,800		970	ug/kg	N/A				ND		59	ug/kg	ND		48	ug/kg
Benzo(g,h,i)perylene	100,000	500,000	1,000,000	1,000		970	ug/kg	N/A				ND		59	ug/kg	ND		48	ug/kg
Benzo(k)fluoranthene	800	56,000	1,700	4,000		970	ug/kg	N/A				ND		59	ug/kg	ND		48	ug/kg
bis(2-Chloroethoxy)methane	NA	NA	NA	ND		970	ug/kg	N/A				ND		59	ug/kg	ND		48	ug/kg
bis(2-Chloroethyl)ether	NA	NA	NA	ND		970	ug/kg	N/A				ND		59	ug/kg	ND		48	ug/kg
bis(2-Ethylhexyl)phthalate	50,000	NA	NA	1,500		970	ug/kg	N/A				ND		120	ug/kg	ND		97	ug/kg
Butylbenzylphthalate	50,000	NA	NA	ND		970	ug/kg	N/A				ND		59	ug/kg	ND		48	ug/kg
Carbazole	NA	NA	NA	2,500		970	ug/kg	N/A				ND		59	ug/kg	ND		48	ug/kg
Chrysene	1,000	56,000	1,000	8,200		970	ug/kg	N/A				ND		59	ug/kg	ND		48	ug/kg
Dibenz(a,h)anthracene	330	560	1,000,000	ND		970	ug/kg	N/A				ND		59	ug/kg	ND		48	ug/kg

Shaded values indicate a Track 1 SCO exceedance
NA - Not Applicable
N/A - Not Analyzed
ND - Not Detected
SB - Soil Background
RL - Laboratory Reporting Limit

TABLE 2 - EXCEEDANCES OF SOIL/FILL SCOs
CONCORD HOTEL AND RESORT
TOWN OF THOMPSON, NEW YORK
NYSDEC BCP No. C353008
SESI CONSULTING ENGINEERS PROJECT # 7180

TestName	Unrestricted Track 1 SCO (ug/kg)	Protection of Public Health Commercial (ug/kg)	Protection of Groundwater (ug/kg)	OU-1A-9A x4 Z0823210 8/19/08				OU-1A-9ARA Z0823210RA 8/19/08				OU-1A-10A Z0823211 8/19/08				OU-1A-10B Z0823212 8/19/08			
				Result	Flg	RL	Units	Result	Flg	RL	Units	Result	Flg	RL	Units	Result	Flg	RL	Units
Dibenzofuran	7,000	NA	NA	1,400		970	ug/kg	N/A				ND		59	ug/kg	ND		48	ug/kg
Diethylphthalate	7,100	NA	NA	ND		970	ug/kg	N/A				ND		59	ug/kg	ND		48	ug/kg
Dimethylphthalate	2,000	NA	NA	ND		970	ug/kg	N/A				ND		59	ug/kg	ND		48	ug/kg
Di-n-butylphthalate	8,100	NA	NA	ND		970	ug/kg	N/A				ND		59	ug/kg	ND		48	ug/kg
Di-n-Octylphthalate	50,000	NA	NA	ND		970	ug/kg	N/A				ND		59	ug/kg	ND		48	ug/kg
Diphenylamine	NA	NA	NA	ND		970	ug/kg	N/A				ND		59	ug/kg	ND		48	ug/kg
Fluoranthene	100,000	500,000	1,000,000	22,000		970	ug/kg	N/A				ND		59	ug/kg	ND		48	ug/kg
Fluorene	30,000	500,000	386,000	2,100		970	ug/kg	N/A				ND		59	ug/kg	ND		48	ug/kg
Hexachlorobenzene	330	6,000	3,200	ND		970	ug/kg	N/A				ND		59	ug/kg	ND		48	ug/kg
Hexachlorobutadiene	NA	NA	NA	ND		970	ug/kg	N/A				ND		59	ug/kg	ND		48	ug/kg
Hexachlorocyclopentadiene	NA	NA	NA	ND		970	ug/kg	N/A				ND		59	ug/kg	ND		48	ug/kg
Hexachloroethane	NA	NA	NA	ND		970	ug/kg	N/A				ND		59	ug/kg	ND		48	ug/kg
Indeno(1,2,3-cd)pyrene	500	5,600	8,200	1,000		970	ug/kg	N/A				ND		59	ug/kg	ND		48	ug/kg
Isophorone	4,400	NA	NA	ND		970	ug/kg	N/A				ND		59	ug/kg	ND		48	ug/kg
Naphthalene	12,000	500,000	12,000	1,000		970	ug/kg	N/A				ND		59	ug/kg	ND		48	ug/kg
Nitrobenzene	200	NA	NA	ND		970	ug/kg	N/A				ND		59	ug/kg	ND		48	ug/kg
n-Nitroso-di-n-propylamine	NA	NA	NA	ND		970	ug/kg	N/A				ND		59	ug/kg	ND		48	ug/kg
Pentachlorophenol	800	6,700	800	ND		970	ug/kg	N/A				ND		59	ug/kg	ND		48	ug/kg
Phenanthrene	100,000	500,000	1,000,000	17,000		970	ug/kg	N/A				ND		59	ug/kg	ND		48	ug/kg
Phenol	330	500,000	330	ND		970	ug/kg	N/A				ND		59	ug/kg	ND		48	ug/kg
Pyrene	100,000	500,000	1,000,000	16,000		970	ug/kg	N/A				ND		59	ug/kg	ND		48	ug/kg
TPH	NA	NA	NA	1,100,000		97,000	ug/kg	N/A				ND		95000	ug/kg	ND		77000	ug/kg
Pesticides																			
4,4'-DDD	3.3	92,000	14,000	N/A				N/A				ND		2.4	ug/kg	ND		1.9	ug/kg
4,4'-DDE	3.3	62,000	17,000	N/A				N/A				ND		2.4	ug/kg	ND		1.9	ug/kg
4,4'-DDT	3.3	47,000	136,000	N/A				N/A				ND		2.4	ug/kg	ND		1.9	ug/kg
Aldrin	5	680	190	N/A				N/A				ND		2.4	ug/kg	ND		1.9	ug/kg
alpha-BHC	20	3,400	20	N/A				N/A				ND		4.8	ug/kg	ND		3.9	ug/kg
alpha-Chlordane	94	24,000	2,900	N/A				N/A				ND		4.8	ug/kg	ND		3.9	ug/kg
beta-BHC	36	3,000	90	N/A				N/A				ND		4.8	ug/kg	ND		3.9	ug/kg
delta-BHC	40	500,000	250	N/A				N/A				ND		4.8	ug/kg	ND		3.9	ug/kg
Dieldrin	5	1,400	100	N/A				N/A				ND		2.4	ug/kg	ND		1.9	ug/kg
Endosulfan I	2,400	200,000	102,000	N/A				N/A				ND		19	ug/kg	ND		15	ug/kg
Endosulfan II	2,400	200,000	102,000	N/A				N/A				ND		19	ug/kg	ND		15	ug/kg
Endosulfan sulfate	2,400	200,000	1,000,000	N/A				N/A				ND		19	ug/kg	ND		15	ug/kg
Endrin	14	89,000	60	N/A				N/A				ND		4.8	ug/kg	ND		3.9	ug/kg
Endrin aldehyde	NA	NA	NA	N/A				N/A				ND		19	ug/kg	ND		15	ug/kg
Endrin ketone	NA	NA	NA	N/A				N/A				ND		19	ug/kg	ND		15	ug/kg
gamma-BHC	100	NA	NA	N/A				N/A				ND		4.8	ug/kg	ND		3.9	ug/kg
gamma-Chlordane	94	NA	NA	N/A				N/A				ND		4.8	ug/kg	ND		3.9	ug/kg
Heptachlor	42	15,000	380	N/A				N/A				ND		4.8	ug/kg	ND		3.9	ug/kg
Heptachlor epoxide	20	NA	NA	N/A				N/A				ND		4.8	ug/kg	ND		3.9	ug/kg
Methoxychlor	10,000	NA	NA	N/A				N/A				ND		19	ug/kg	ND		15	ug/kg

Shaded values indicate a Track 1 SCO exceedance
NA - Not Applicable
N/A - Not Analyzed
ND - Not Detected
SB - Soil Background
RL - Laboratory Reporting Limit

TABLE 2 - EXCEEDANCES OF SOIL/FILL SCOs
CONCORD HOTEL AND RESORT
TOWN OF THOMPSON, NEW YORK
NYSDEC BCP No. C353008
SESI CONSULTING ENGINEERS PROJECT # 7180

TestName	Unrestricted Track 1 SCO (ug/kg)	Protection of Public Health Commercial (ug/kg)	Protection of Groundwater (ug/kg)	OU-1A-9A x4 Z0823210 8/19/08				OU-1A-9ARA Z0823210RA 8/19/08				OU-1A-10A Z0823211 8/19/08				OU-1A-10B Z0823212 8/19/08			
				Result	Flg	RL	Units	Result	Flg	RL	Units	Result	Flg	RL	Units	Result	Flg	RL	Units
PCB's																			
Aroclor 1221-1	100	1,000	3,200	N/A				N/A				ND		59	ug/kg	ND		48	ug/kg
Aroclor 1221-2	100	1,000	3,200	N/A				N/A				ND		59	ug/kg	ND		48	ug/kg
Aroclor 1221-3	100	1,000	3,200	N/A				N/A				ND		59	ug/kg	ND		48	ug/kg
Aroclor 1232-1	100	1,000	3,200	N/A				N/A				ND		59	ug/kg	ND		48	ug/kg
Aroclor 1232-2	100	1,000	3,200	N/A				N/A				ND		59	ug/kg	ND		48	ug/kg
Aroclor 1232-3	100	1,000	3,200	N/A				N/A				ND		59	ug/kg	ND		48	ug/kg
Aroclor 1242-1	100	1,000	3,200	N/A				N/A				ND		59	ug/kg	ND		48	ug/kg
Aroclor 1242-2	100	1,000	3,200	N/A				N/A				ND		59	ug/kg	ND		48	ug/kg
Aroclor 1242-3	100	1,000	3,200	N/A				N/A				ND		59	ug/kg	ND		48	ug/kg
Aroclor 1248-1	100	1,000	3,200	N/A				N/A				ND		59	ug/kg	ND		48	ug/kg
Aroclor 1248-2	100	1,000	3,200	N/A				N/A				ND		59	ug/kg	ND		48	ug/kg
Aroclor 1248-3	100	1,000	3,200	N/A				N/A				ND		59	ug/kg	ND		48	ug/kg
Aroclor 1254-1	100	1,000	3,200	N/A				N/A				ND		59	ug/kg	ND		48	ug/kg
Aroclor 1254-2	100	1,000	3,200	N/A				N/A				ND		59	ug/kg	ND		48	ug/kg
Aroclor 1254-3	100	1,000	3,200	N/A				N/A				ND		59	ug/kg	ND		48	ug/kg
Aroclor 1016-1	100	1,000	3,200	N/A				N/A				ND		59	ug/kg	ND		48	ug/kg
Aroclor 1016-2	100	1,000	3,200	N/A				N/A				ND		59	ug/kg	ND		48	ug/kg
Aroclor 1016-3	100	1,000	3,200	N/A				N/A				ND		59	ug/kg	ND		48	ug/kg
Aroclor 1260-1	100	1,000	3,200	N/A				N/A				ND		59	ug/kg	ND		48	ug/kg
Aroclor 1260-2	100	1,000	3,200	N/A				N/A				ND		59	ug/kg	ND		48	ug/kg
Aroclor 1260-3	100	1,000	3,200	N/A				N/A				ND		59	ug/kg	ND		48	ug/kg
Metals	(mg/kg)	(mg/kg)	(mg/kg)																
Mercury	0.18	2.8	0.18	N/A				N/A				ND		0.1	mg/Kg	ND		0.1	mg/Kg
Aluminum	SB	NA	NA	N/A				N/A				5700		1.09	mg/Kg	6720		1.07	mg/Kg
Antimony	SB	NA	NA	N/A				N/A				ND		1.09	mg/Kg	ND		1.07	mg/Kg
Arsenic	13	16	16	N/A				N/A				1.81		1.09	mg/Kg	3.3		1.07	mg/Kg
Barium	350	400	820	N/A				N/A				44.8		1.09	mg/Kg	44.2		1.07	mg/Kg
Beryllium	7.2	590	47	N/A				N/A				ND		0.545	mg/Kg	ND		0.535	mg/Kg
Cadmium	2.5	9.3	7.5	N/A				N/A				ND		0.545	mg/Kg	ND		0.535	mg/Kg
Calcium	SB	NA	NA	N/A				N/A				11800		2.18	mg/Kg	438		2.14	mg/Kg
Chromium	30	1,500	NA	N/A				N/A				6.54		0.545	mg/Kg	6.52		0.535	mg/Kg
Cobalt	30 or SB	NA	NA	N/A				N/A				6.24		1.09	mg/Kg	7.56		1.07	mg/Kg
Copper	50	270	1,720	N/A				N/A				16.4		1.09	mg/Kg	20		1.07	mg/Kg
Iron	2,000 or SB	NA	NA	N/A				N/A				11900		1.09	mg/Kg	13500		1.07	mg/Kg
Lead	63	1,000	450	N/A				N/A				15.5		1.09	mg/Kg	10.6		1.07	mg/Kg
Magnesium	SB	NA	NA	N/A				N/A				3250		2.18	mg/Kg	2530		2.14	mg/Kg
Manganese	1,600	10,000	2,000	N/A				N/A				299		1.09	mg/Kg	346		1.07	mg/Kg
Nickel	30	310	130	N/A				N/A				10.4		1.09	mg/Kg	10.1		1.07	mg/Kg
Potassium	SB	NA	NA	N/A				N/A				569		3.27	mg/Kg	740		3.21	mg/Kg
Selenium	3.9	1,500	4	N/A				N/A				ND		1.09	mg/Kg	ND		1.07	mg/Kg
Silver	2	1,500	8.3	N/A				N/A				ND		1.09	mg/Kg	ND		1.07	mg/Kg
Sodium	SB	NA	NA	N/A				N/A				84.6		5.45	mg/Kg	108		5.35	mg/Kg
Thallium	SB	NA	NA	N/A				N/A				ND		1.09	mg/Kg	ND		1.07	mg/Kg
Vanadium	150 or SB	NA	NA	N/A				N/A				16		2.18	mg/Kg	5.72		2.14	mg/Kg
Zinc	109	10,000	2,480	N/A				N/A				43.8		2.18	mg/Kg	39.7		2.14	mg/Kg
Other Parameters																			
Cyanide	27	27	40	N/A				NA/				ND		1	mg/kg	ND		1	mg/kg

Shaded values indicate a Track 1 SCO exceedance
NA - Not Applicable
N/A - Not Analyzed
ND - Not Detected
SB - Soil Background
RL - Laboratory Reporting Limit

TABLE 2 - EXCEEDANCES OF SOIL/FILL SCOs
CONCORD HOTEL AND RESORT
TOWN OF THOMPSON, NEW YORK
NYSDEC BCP No. C353008
SESI CONSULTING ENGINEERS PROJECT # 7180

TestName	Unrestricted Track 1 SCO (ug/kg)	Protection of Public Health Commercial (ug/kg)	Protection of Groundwater (ug/kg)	OU-1A-10C Z0823213 8/19/08				OU-1A-10C x10 Z0823213 8/19/08				OU-1A-10D Z0823214 8/19/08				OU-1A-11A Z0823218 8/19/08			
				Result	Flg	RL	Units	Result	Flg	RL	Units	Result	Flg	RL	Units	Result	Flg	RL	Units
Volatile Organics																			
1,1,1-Trichloroethane	680	500,000	680	ND		1.3	ug/kg	N/A				ND		1.3	ug/kg	ND		1.3	ug/kg
1,1,2,2-Tetrachloroethane	600	NA	NA	ND		1.3	ug/kg	N/A				ND		1.3	ug/kg	ND		1.3	ug/kg
1,1,2-Trichloroethane	NA	NA	NA	ND		1.3	ug/kg	N/A				ND		1.3	ug/kg	ND		1.3	ug/kg
1,1,2-Trichlorotrifluoroethane	6,000	NA	NA	ND		1.3	ug/kg	N/A				ND		1.3	ug/kg	ND		1.3	ug/kg
1,1-Dichloroethane	270	240,000	270	ND		1.3	ug/kg	N/A				ND		1.3	ug/kg	ND		1.3	ug/kg
1,1-Dichloroethene	330	500,000	330	ND		1.3	ug/kg	N/A				ND		1.3	ug/kg	ND		1.3	ug/kg
1,2-Dibromo-3-chloropropane	NA	NA	NA	ND		1.3	ug/kg	N/A				ND		1.3	ug/kg	ND		1.3	ug/kg
1,2-Dibromoethane	NA	NA	NA	ND		1.3	ug/kg	N/A				ND		1.3	ug/kg	ND		1.3	ug/kg
1,2-Dichlorobenzene	1,100	500,000	1,100	ND		1.3	ug/kg	N/A				ND		1.3	ug/kg	ND		1.3	ug/kg
1,2-Dichloroethane	20	30,000	20	ND		1.3	ug/kg	N/A				ND		1.3	ug/kg	ND		1.3	ug/kg
1,2-Dichloropropane	NA	NA	NA	ND		1.3	ug/kg	N/A				ND		1.3	ug/kg	ND		1.3	ug/kg
1,3-Dichlorobenzene	2,400	280,000	2,400	ND		1.3	ug/kg	N/A				ND		1.3	ug/kg	ND		1.3	ug/kg
1,4-Dichlorobenzene	1,800	130,000	1,800	ND		1.3	ug/kg	N/A				ND		1.3	ug/kg	ND		1.3	ug/kg
2-Butanone	120	NA	NA	ND		6.3	ug/kg	N/A				ND		6.4	ug/kg	ND		6.5	ug/kg
2-Hexanone	NA	NA	NA	ND		6.3	ug/kg	N/A				ND		6.4	ug/kg	ND		6.5	ug/kg
4-Methyl-2-pentanone	1,000	NA	NA	ND		6.3	ug/kg	N/A				ND		6.4	ug/kg	ND		6.5	ug/kg
Acetone	50	500,000	50	ND		31	ug/kg	N/A				ND		32	ug/kg	ND		33	ug/kg
Benzene	60	44,000	60	ND		1.3	ug/kg	N/A				ND		1.3	ug/kg	ND		1.3	ug/kg
Bromodichloromethane	NA	NA	NA	ND		1.3	ug/kg	N/A				ND		1.3	ug/kg	ND		1.3	ug/kg
Bromoform	NA	NA	NA	ND		1.3	ug/kg	N/A				ND		1.3	ug/kg	ND		1.3	ug/kg
Bromomethane	NA	NA	NA	ND		1.3	ug/kg	N/A				ND		1.3	ug/kg	ND		1.3	ug/kg
Carbon Disulfide	2,700	NA	NA	2.5		1.3	ug/kg	N/A				ND		1.3	ug/kg	ND		1.3	ug/kg
Carbon Tetrachloride	760	22,000	760	ND		1.3	ug/kg	N/A				ND		1.3	ug/kg	ND		1.3	ug/kg
Chlorobenzene	1,100	500,000	1,100	ND		1.3	ug/kg	N/A				ND		1.3	ug/kg	ND		1.3	ug/kg
Chloroethane	1,900	NA	NA	ND		1.3	ug/kg	N/A				ND		1.3	ug/kg	ND		1.3	ug/kg
Chloroform	370	350,000	370	ND		1.3	ug/kg	N/A				ND		1.3	ug/kg	ND		1.3	ug/kg
Chloromethane	NA	NA	NA	ND		1.3	ug/kg	N/A				ND		1.3	ug/kg	ND		1.3	ug/kg
cis-1,2-Dichloroethene	250	NA	NA	ND		1.3	ug/kg	N/A				ND		1.3	ug/kg	ND		1.3	ug/kg
cis-1,3-Dichloropropene	NA	NA	NA	ND		1.3	ug/kg	N/A				ND		1.3	ug/kg	ND		1.3	ug/kg
Cyclohexane	NA	NA	NA	ND		1.3	ug/kg	N/A				ND		1.3	ug/kg	ND		1.3	ug/kg
Dibromochloromethane	NA	NA	NA	ND		1.3	ug/kg	N/A				ND		1.3	ug/kg	ND		1.3	ug/kg
Dichlorodifluoromethane	NA	NA	NA	ND		13	ug/kg	N/A				ND		13	ug/kg	ND		13	ug/kg
Ethylbenzene	1,000	390,000	1,000	29		1.3	ug/kg	N/A				ND		1.3	ug/kg	ND		1.3	ug/kg
Isopropylbenzene	NA	NA	NA	ND		1.3	ug/kg	N/A				ND		1.3	ug/kg	ND		1.3	ug/kg
m&p-Xylenes	260	NA	NA	ND		2.5	ug/kg	N/A				ND		2.6	ug/kg	ND		2.6	ug/kg
Methylcyclohexane	NA	NA	NA	ND		1.3	ug/kg	N/A				ND		1.3	ug/kg	ND		1.3	ug/kg
Methylene Chloride	50	500,000	50	ND		1.3	ug/kg	N/A				ND		1.3	ug/kg	ND		1.3	ug/kg
Methyl-tert-butyl Ether	930	NA	NA	ND		1.3	ug/kg	N/A				ND		1.3	ug/kg	ND		1.3	ug/kg
o-Xylene	260	NA	NA	ND		1.3	ug/kg	N/A				ND		1.3	ug/kg	ND		1.3	ug/kg
Styrene	NA	NA	NA	ND		1.3	ug/kg	N/A				ND		1.3	ug/kg	ND		1.3	ug/kg
tert-Butyl Alcohol	NA	NA	NA	ND		6.3	ug/kg	N/A				ND		6.4	ug/kg	ND		6.5	ug/kg
Tetrachloroethene	1,300	150,000	1,300	ND		1.3	ug/kg	N/A				ND		1.3	ug/kg	ND		1.3	ug/kg
Toluene	700	500,000	700	ND		1.3	ug/kg	N/A				ND		1.3	ug/kg	ND		1.3	ug/kg
trans-1,2-Dichloroethene	190	NA	NA	ND		1.3	ug/kg	N/A				ND		1.3	ug/kg	ND		1.3	ug/kg
trans-1,3-Dichloropropene	NA	NA	NA	ND		1.3	ug/kg	N/A				ND		1.3	ug/kg	ND		1.3	ug/kg
Trichloroethene	470	200,000	470	ND		1.3	ug/kg	N/A				ND		1.3	ug/kg	ND		1.3	ug/kg
Trichlorofluoromethane	NA	NA	NA	ND		1.3	ug/kg	N/A				ND		1.3	ug/kg	ND		1.3	ug/kg
Vinyl Chloride	20	13,000	20	ND		1.3	ug/kg	N/A				ND		1.3	ug/kg	ND		1.3	ug/kg

Shaded values indicate a Track 1 SCO exceedance
NA - Not Applicable
N/A - Not Analyzed
ND - Not Detected
SB - Soil Background
RL - Laboratory Reporting Limit

TABLE 2 - EXCEEDANCES OF SOIL/FILL SCOs
CONCORD HOTEL AND RESORT
TOWN OF THOMPSON, NEW YORK
NYSDEC BCP No. C353008
SESI CONSULTING ENGINEERS PROJECT # 7180

TestName	Unrestricted Track 1 SCO (ug/kg)	Protection of Public Health Commercial (ug/kg)	Protection of Groundwater (ug/kg)	OU-1A-10C Z0823213 8/19/08				OU-1A-10C x10 Z0823213 8/19/08				OU-1A-10D Z0823214 8/19/08				OU-1A-11A Z0823218 8/19/08			
				Result	Flg	RL	Units	Result	Flg	RL	Units	Result	Flg	RL	Units	Result	Flg	RL	Units
Semi Volatile Organics																			
(3 & 4)-Methylphenol	330	NA	NA	N/A				ND		660	ug/kg	ND		51	ug/kg	N/A			
1,2,4-Trichlorobenzene	3,400	NA	NA	N/A				ND		660	ug/kg	ND		51	ug/kg	N/A			
2,4,5-Trichlorophenol	100	NA	NA	N/A				ND		660	ug/kg	ND		51	ug/kg	N/A			
2,4,6-Trichlorophenol	NA	NA	NA	N/A				ND		660	ug/kg	ND		51	ug/kg	N/A			
2,4-Dichlorophenol	400	NA	NA	N/A				ND		660	ug/kg	ND		51	ug/kg	N/A			
2,4-Dimethylphenol	NA	NA	NA	N/A				ND		660	ug/kg	ND		51	ug/kg	N/A			
2,4-Dinitrophenol	200	NA	NA	N/A				ND		13,000	ug/kg	ND		1,000	ug/kg	N/A			
2,4-Dinitrotoluene	NA	NA	NA	N/A				ND		660	ug/kg	ND		51	ug/kg	N/A			
2,6-Dinitrotoluene	1,000	NA	NA	N/A				ND		660	ug/kg	ND		51	ug/kg	N/A			
2-Chloronaphthalene	NA	NA	NA	N/A				ND		660	ug/kg	ND		51	ug/kg	N/A			
2-Chlorophenol	800	NA	NA	N/A				ND		660	ug/kg	ND		51	ug/kg	N/A			
2-Methyl-4,6-dinitrophenol	NA	NA	NA	N/A				ND		13,000	ug/kg	ND		1,000	ug/kg	N/A			
2-Methylnaphthalene	36,400	NA	NA	N/A				17000		660	ug/kg	ND		51	ug/kg	N/A			
2-Methylphenol	330	NA	NA	N/A				ND		660	ug/kg	ND		51	ug/kg	N/A			
2-Nitroaniline	430	NA	NA	N/A				ND		660	ug/kg	ND		51	ug/kg	N/A			
2-Nitrophenol	330	NA	NA	N/A				ND		660	ug/kg	ND		51	ug/kg	N/A			
3,3'-Dichlorobenzidine	NA	NA	NA	N/A				ND		660	ug/kg	ND		51	ug/kg	N/A			
3-Nitroaniline	500	NA	NA	N/A				ND		660	ug/kg	ND		51	ug/kg	N/A			
4-Bromophenyl-phenylether	NA	NA	NA	N/A				ND		660	ug/kg	ND		51	ug/kg	N/A			
4-Chloro-3-methylphenol	240	NA	NA	N/A				ND		660	ug/kg	ND		51	ug/kg	N/A			
4-Chloroaniline	220	NA	NA	N/A				ND		660	ug/kg	ND		51	ug/kg	N/A			
4-Chlorophenyl-phenylether	NA	NA	NA	N/A				ND		660	ug/kg	ND		51	ug/kg	N/A			
4-Nitroaniline	NA	NA	NA	N/A				ND		660	ug/kg	ND		51	ug/kg	N/A			
4-Nitrophenol	100	NA	NA	N/A				ND		660	ug/kg	ND		51	ug/kg	N/A			
Acenaphthene	20,000	500,000	98,000	N/A				2100		660	ug/kg	ND		51	ug/kg	N/A			
Acenaphthylene	100,000	500,000	107,000	N/A				ND		660	ug/kg	ND		51	ug/kg	N/A			
Aniline	100	NA	NA	N/A				ND		660	ug/kg	ND		51	ug/kg	N/A			
Anthracene	100,000	500,000	1,000,000	N/A				1100		660	ug/kg	ND		51	ug/kg	N/A			
Benzo(a)anthracene	1,000	5,600	1,000	N/A				720		660	ug/kg	ND		51	ug/kg	N/A			
Benzo(a)pyrene	1,000	1,000	22,000	N/A				ND		660	ug/kg	ND		51	ug/kg	N/A			
Benzo(b)fluoranthene	1,000	5,600	1,700	N/A				ND		660	ug/kg	ND		51	ug/kg	N/A			
Benzo(g,h,i)perylene	100,000	500,000	1,000,000	N/A				ND		660	ug/kg	ND		51	ug/kg	N/A			
Benzo(k)fluoranthene	800	56,000	1,700	N/A				ND		660	ug/kg	ND		51	ug/kg	N/A			
bis(2-Chloroethoxy)methane	NA	NA	NA	N/A				ND		660	ug/kg	ND		51	ug/kg	N/A			
bis(2-Chloroethyl)ether	NA	NA	NA	N/A				ND		660	ug/kg	ND		51	ug/kg	N/A			
bis(2-Ethylhexyl)phthalate	50,000	NA	NA	N/A				ND		1,300	ug/kg	ND		100	ug/kg	N/A			
Butylbenzylphthalate	50,000	NA	NA	N/A				ND		660	ug/kg	ND		51	ug/kg	N/A			
Carbazole	NA	NA	NA	N/A				ND		660	ug/kg	ND		51	ug/kg	N/A			
Chrysene	1,000	56,000	1,000	N/A				1200		660	ug/kg	ND		51	ug/kg	N/A			
Dibenz(a,h)anthracene	330	560	1,000,000	N/A				ND		660	ug/kg	ND		51	ug/kg	N/A			

Shaded values indicate a Track 1 SCO exceedance
NA - Not Applicable
N/A - Not Analyzed
ND - Not Detected
SB - Soil Background
RL - Laboratory Reporting Limit

TABLE 2 - EXCEEDANCES OF SOIL/FILL SCOs
CONCORD HOTEL AND RESORT
TOWN OF THOMPSON, NEW YORK
NYSDEC BCP No. C353008
SESI CONSULTING ENGINEERS PROJECT # 7180

TestName	Unrestricted Track 1 SCO (ug/kg)	Protection of Public Health Commercial (ug/kg)	Protection of Groundwater (ug/kg)	OU-1A-10C Z0823213 8/19/08				OU-1A-10C x10 Z0823213 8/19/08				OU-1A-10D Z0823214 8/19/08				OU-1A-11A Z0823218 8/19/08			
				Result	Flg	RL	Units	Result	Flg	RL	Units	Result	Flg	RL	Units	Result	Flg	RL	Units
Dibenzofuran	7,000	NA	NA	N/A				ND		660	ug/kg	ND		51	ug/kg	N/A			
Diethylphthalate	7,100	NA	NA	N/A				ND		660	ug/kg	ND		51	ug/kg	N/A			
Dimethylphthalate	2,000	NA	NA	N/A				ND		660	ug/kg	ND		51	ug/kg	N/A			
Di-n-butylphthalate	8,100	NA	NA	N/A				ND		660	ug/kg	ND		51	ug/kg	N/A			
Di-n-Octylphthalate	50,000	NA	NA	N/A				ND		660	ug/kg	ND		51	ug/kg	N/A			
Diphenylamine	NA	NA	NA	N/A				3000		660	ug/kg	ND		51	ug/kg	N/A			
Fluoranthene	100,000	500,000	1,000,000	N/A				790		660	ug/kg	ND		51	ug/kg	N/A			
Fluorene	30,000	500,000	386,000	N/A				2300		660	ug/kg	ND		51	ug/kg	N/A			
Hexachlorobenzene	330	6,000	3,200	N/A				ND		660	ug/kg	ND		51	ug/kg	N/A			
Hexachlorobutadiene	NA	NA	NA	N/A				ND		660	ug/kg	ND		51	ug/kg	N/A			
Hexachlorocyclopentadiene	NA	NA	NA	N/A				ND		660	ug/kg	ND		51	ug/kg	N/A			
Hexachloroethane	NA	NA	NA	N/A				ND		660	ug/kg	ND		51	ug/kg	N/A			
Indeno(1,2,3-cd)pyrene	500	5,600	8,200	N/A				ND		660	ug/kg	ND		51	ug/kg	N/A			
Isophorone	4,400	NA	NA	N/A				ND		660	ug/kg	ND		51	ug/kg	N/A			
Naphthalene	12,000	500,000	12,000	N/A				ND		660	ug/kg	ND		51	ug/kg	N/A			
Nitrobenzene	200	NA	NA	N/A				ND		660	ug/kg	ND		51	ug/kg	N/A			
n-Nitroso-di-n-propylamine	NA	NA	NA	N/A				ND		660	ug/kg	ND		51	ug/kg	N/A			
Pentachlorophenol	800	6,700	800	N/A				ND		660	ug/kg	ND		51	ug/kg	N/A			
Phenanthrene	100,000	500,000	1,000,000	N/A				6500		660	ug/kg	67		51	ug/kg	N/A			
Phenol	330	500,000	330	N/A				ND		660	ug/kg	ND		51	ug/kg	N/A			
Pyrene	100,000	500,000	1,000,000	N/A				3700		660	ug/kg	100		51	ug/kg	N/A			
TPH	NA	NA	NA	N/A				1990000		97,000	ug/kg	53,000		47000	ug/kg	N/A			
Pesticides																			
4,4'-DDD	3.3	92,000	14,000	ND		2.6	ug/kg	N/A				ND		2	ug/kg	N/A			
4,4'-DDE	3.3	62,000	17,000	ND		2.6	ug/kg	N/A				ND		2	ug/kg	N/A			
4,4'-DDT	3.3	47,000	136,000	ND		2.6	ug/kg	N/A				ND		2	ug/kg	N/A			
Aldrin	5	680	190	ND		2.6	ug/kg	N/A				ND		2	ug/kg	N/A			
alpha-BHC	20	3,400	20	ND		5.3	ug/kg	N/A				ND		4.1	ug/kg	N/A			
alpha-Chlordane	94	24,000	2,900	ND		5.3	ug/kg	N/A				ND		4.1	ug/kg	N/A			
beta-BHC	36	3,000	90	ND		5.3	ug/kg	N/A				ND		4.1	ug/kg	N/A			
delta-BHC	40	500,000	250	ND		5.3	ug/kg	N/A				ND		4.1	ug/kg	N/A			
Dieldrin	5	1,400	100	ND		2.6	ug/kg	N/A				ND		2	ug/kg	N/A			
Endosulfan I	2,400	200,000	102,000	ND		21	ug/kg	N/A				ND		16	ug/kg	N/A			
Endosulfan II	2,400	200,000	102,000	ND		21	ug/kg	N/A				ND		16	ug/kg	N/A			
Endosulfan sulfate	2,400	200,000	1,000,000	ND		21	ug/kg	N/A				ND		16	ug/kg	N/A			
Endrin	14	89,000	60	ND		5.3	ug/kg	N/A				ND		4.1	ug/kg	N/A			
Endrin aldehyde	NA	NA	NA	ND		21	ug/kg	N/A				ND		16	ug/kg	N/A			
Endrin ketone	NA	NA	NA	ND		21	ug/kg	N/A				ND		16	ug/kg	N/A			
gamma-BHC	100	NA	NA	ND		5.3	ug/kg	N/A				ND		4.1	ug/kg	N/A			
gamma-Chlordane	94	NA	NA	ND		5.3	ug/kg	N/A				ND		4.1	ug/kg	N/A			
Heptachlor	42	15,000	380	ND		5.3	ug/kg	N/A				ND		4.1	ug/kg	N/A			
Heptachlor epoxide	20	NA	NA	ND		5.3	ug/kg	N/A				ND		4.1	ug/kg	N/A			
Methoxychlor	10,000	NA	NA	ND		21	ug/kg	N/A				ND		16	ug/kg	N/A			

Shaded values indicate a Track 1 SCO exceedance
NA - Not Applicable
N/A - Not Analyzed
ND - Not Detected
SB - Soil Background
RL - Laboratory Reporting Limit

TABLE 2 - EXCEEDANCES OF SOIL/FILL SCOs
CONCORD HOTEL AND RESORT
TOWN OF THOMPSON, NEW YORK
NYSDEC BCP No. C353008
SESI CONSULTING ENGINEERS PROJECT # 7180

TestName	Unrestricted Track 1 SCO (ug/kg)	Protection of Public Health Commercial (ug/kg)	Protection of Groundwater (ug/kg)	OU-1A-10C Z0823213 8/19/08				OU-1A-10C x10 Z0823213 8/19/08				OU-1A-10D Z0823214 8/19/08				OU-1A-11A Z0823218 8/19/08			
				Result	Flg	RL	Units	Result	Flg	RL	Units	Result	Flg	RL	Units	Result	Flg	RL	Units
PCB's																			
Aroclor 1221-1	100	1,000	3,200	ND		66	ug/kg	N/A				ND		51	ug/kg	ND		54	ug/kg
Aroclor 1221-2	100	1,000	3,200	ND		66	ug/kg	N/A				ND		51	ug/kg	ND		54	ug/kg
Aroclor 1221-3	100	1,000	3,200	ND		66	ug/kg	N/A				ND		51	ug/kg	ND		54	ug/kg
Aroclor 1232-1	100	1,000	3,200	ND		66	ug/kg	N/A				ND		51	ug/kg	ND		54	ug/kg
Aroclor 1232-2	100	1,000	3,200	ND		66	ug/kg	N/A				ND		51	ug/kg	ND		54	ug/kg
Aroclor 1232-3	100	1,000	3,200	ND		66	ug/kg	N/A				ND		51	ug/kg	ND		54	ug/kg
Aroclor 1242-1	100	1,000	3,200	ND		66	ug/kg	N/A				ND		51	ug/kg	ND		54	ug/kg
Aroclor 1242-2	100	1,000	3,200	ND		66	ug/kg	N/A				ND		51	ug/kg	ND		54	ug/kg
Aroclor 1242-3	100	1,000	3,200	ND		66	ug/kg	N/A				ND		51	ug/kg	ND		54	ug/kg
Aroclor 1248-1	100	1,000	3,200	ND		66	ug/kg	N/A				ND		51	ug/kg	ND		54	ug/kg
Aroclor 1248-2	100	1,000	3,200	ND		66	ug/kg	N/A				ND		51	ug/kg	ND		54	ug/kg
Aroclor 1248-3	100	1,000	3,200	ND		66	ug/kg	N/A				ND		51	ug/kg	ND		54	ug/kg
Aroclor 1254-1	100	1,000	3,200	ND		66	ug/kg	N/A				ND		51	ug/kg	ND		54	ug/kg
Aroclor 1254-2	100	1,000	3,200	ND		66	ug/kg	N/A				ND		51	ug/kg	ND		54	ug/kg
Aroclor 1254-3	100	1,000	3,200	ND		66	ug/kg	N/A				ND		51	ug/kg	ND		54	ug/kg
Aroclor 1016-1	100	1,000	3,200	ND		66	ug/kg	N/A				ND		51	ug/kg	ND		54	ug/kg
Aroclor 1016-2	100	1,000	3,200	ND		66	ug/kg	N/A				ND		51	ug/kg	ND		54	ug/kg
Aroclor 1016-3	100	1,000	3,200	ND		66	ug/kg	N/A				ND		51	ug/kg	ND		54	ug/kg
Aroclor 1260-1	100	1,000	3,200	ND		66	ug/kg	N/A				ND		51	ug/kg	ND		54	ug/kg
Aroclor 1260-2	100	1,000	3,200	ND		66	ug/kg	N/A				ND		51	ug/kg	ND		54	ug/kg
Aroclor 1260-3	100	1,000	3,200	ND		66	ug/kg	N/A				ND		51	ug/kg	ND		54	ug/kg
Metals	(mg/kg)	(mg/kg)	(mg/kg)																
Mercury	0.18	2.8	0.18	ND		0.1	mg/Kg	N/A				ND		0.1	mg/Kg	ND		0.1	mg/Kg
Aluminum	SB	NA	NA	3950		1.08	mg/Kg	N/A				12000		1.15	mg/Kg	4240		1.06	mg/Kg
Antimony	SB	NA	NA	ND		1.08	mg/Kg	N/A				ND		1.15	mg/Kg	1.23		1.06	mg/Kg
Arsenic	13	16	16	ND		1.08	mg/Kg	N/A				6.56		1.15	mg/Kg	ND		1.06	mg/Kg
Barium	350	400	820	26		1.08	mg/Kg	N/A				140		1.15	mg/Kg	44.2		1.06	mg/Kg
Beryllium	7.2	590	47	ND		0.54	mg/Kg	N/A				1.37		0.575	mg/Kg	ND		0.53	mg/Kg
Cadmium	2.5	9.3	7.5	ND		0.54	mg/Kg	N/A				ND		0.575	mg/Kg	ND		0.53	mg/Kg
Calcium	SB	NA	NA	618		2.16	mg/Kg	N/A				6040		2.3	mg/Kg	484		2.12	mg/Kg
Chromium	30	1,500	NA	5.34		0.54	mg/Kg	N/A				14		0.575	mg/Kg	5.17		0.53	mg/Kg
Cobalt	30 or SB	NA	NA	5.05		1.08	mg/Kg	N/A				15.2		1.15	mg/Kg	5.92		1.06	mg/Kg
Copper	50	270	1,720	15.5		1.08	mg/Kg	N/A				108		1.15	mg/Kg	12.7		1.06	mg/Kg
Iron	2,000 or SB	NA	NA	9250		1.08	mg/Kg	N/A				22300		1.15	mg/Kg	9890		1.06	mg/Kg
Lead	63	1,000	450	11.9		1.08	mg/Kg	N/A				11.1		1.15	mg/Kg	8.51		1.06	mg/Kg
Magnesium	SB	NA	NA	1810		2.16	mg/Kg	N/A				4990		2.3	mg/Kg	1950		2.12	mg/Kg
Manganese	1,600	10,000	2,000	153		1.08	mg/Kg	N/A				679		1.15	mg/Kg	274		1.06	mg/Kg
Nickel	30	310	130	7.46		1.08	mg/Kg	N/A				23.5		1.15	mg/Kg	9.66		1.06	mg/Kg
Potassium	SB	NA	NA	414		3.24	mg/Kg	N/A				1250		3.45	mg/Kg	459		3.18	mg/Kg
Selenium	3.9	1,500	4	ND		1.08	mg/Kg	N/A				ND		1.15	mg/Kg	ND		1.06	mg/Kg
Silver	2	1,500	8.3	ND		1.08	mg/Kg	N/A				ND		1.15	mg/Kg	ND		1.06	mg/Kg
Sodium	SB	NA	NA	3.12		5.4	mg/Kg	N/A				6		5.75	mg/Kg	53.3		5.3	mg/Kg
Thallium	SB	NA	NA	ND		1.08	mg/Kg	N/A				ND		1.15	mg/Kg	ND		1.06	mg/Kg
Vanadium	150 or SB	NA	NA	3.95		2.16	mg/Kg	N/A				8.2		2.3	mg/Kg	9.62		2.12	mg/Kg
Zinc	109	10,000	2,480	28.4		2.16	mg/Kg	N/A				85.6		2.3	mg/Kg	42.4		2.12	mg/Kg
Other Parameters																			
Cyanide	27	27	40	ND		1	mg/kg	N/A				ND		1	mg/kg	ND		1	mg/kg

Shaded values indicate a Track 1 SCO exceedance
NA - Not Applicable
N/A - Not Analyzed
ND - Not Detected
SB - Soil Background
RL - Laboratory Reporting Limit

TABLE 2 - EXCEEDANCES OF SOIL/FILL SCOs
CONCORD HOTEL AND RESORT
TOWN OF THOMPSON, NEW YORK
NYSDEC BCP No. C353008
SESI CONSULTING ENGINEERS PROJECT # 7180

TestName	Unrestricted Track 1 SCO (ug/kg)	Protection of Public Health Commercial (ug/kg)	Protection of Groundwater (ug/kg)	OU-1A-11ARA Z0823218RA 8/19/08				OU-1A-11A x10 Z0823218 8/19/08				OU-1A-11B Z0823219 8/19/08				OU-1A-12A Z0823308 8/20/08			
				Result	Flg	RL	Units	Result	Flg	RL	Units	Result	Flg	RL	Units	Result	Flg	RL	Units
Volatile Organics																			
1,1,1-Trichloroethane	680	500,000	680	ND		1.3	ug/kg	N/A				ND		1.4	ug/kg	ND		1.3	ug/kg
1,1,2,2-Tetrachloroethane	600	NA	NA	ND		1.3	ug/kg	N/A				ND		1.4	ug/kg	ND		1.3	ug/kg
1,1,2-Trichloroethane	NA	NA	NA	ND		1.3	ug/kg	N/A				ND		1.4	ug/kg	ND		1.3	ug/kg
1,1,2-Trichlorotrifluoroethane	6,000	NA	NA	ND		1.3	ug/kg	N/A				ND		1.4	ug/kg	ND		1.3	ug/kg
1,1-Dichloroethane	270	240,000	270	ND		1.3	ug/kg	N/A				ND		1.4	ug/kg	ND		1.3	ug/kg
1,1-Dichloroethene	330	500,000	330	ND		1.3	ug/kg	N/A				ND		1.4	ug/kg	ND		1.3	ug/kg
1,2-Dibromo-3-chloropropane	NA	NA	NA	ND		1.3	ug/kg	N/A				ND		1.4	ug/kg	ND		1.3	ug/kg
1,2-Dibromoethane	NA	NA	NA	ND		1.3	ug/kg	N/A				ND		1.4	ug/kg	ND		1.3	ug/kg
1,2-Dichlorobenzene	1,100	500,000	1,100	ND		1.3	ug/kg	N/A				ND		1.4	ug/kg	ND		1.3	ug/kg
1,2-Dichloroethane	20	30,000	20	ND		1.3	ug/kg	N/A				ND		1.4	ug/kg	ND		1.3	ug/kg
1,2-Dichloropropane	NA	NA	NA	ND		1.3	ug/kg	N/A				ND		1.4	ug/kg	ND		1.3	ug/kg
1,3-Dichlorobenzene	2,400	280,000	2,400	ND		1.3	ug/kg	N/A				ND		1.4	ug/kg	ND		1.3	ug/kg
1,4-Dichlorobenzene	1,800	130,000	1,800	ND		1.3	ug/kg	N/A				ND		1.4	ug/kg	ND		1.3	ug/kg
2-Butanone	120	NA	NA	ND		6.7	ug/kg	N/A				ND		6.8	ug/kg	ND		6.3	ug/kg
2-Hexanone	NA	NA	NA	ND		6.7	ug/kg	N/A				ND		6.8	ug/kg	ND		6.3	ug/kg
4-Methyl-2-pentanone	1,000	NA	NA	ND		6.7	ug/kg	N/A				ND		6.8	ug/kg	ND		6.3	ug/kg
Acetone	50	500,000	50	ND		33	ug/kg	N/A				ND		34	ug/kg	ND		31	ug/kg
Benzene	60	44,000	60	ND		1.3	ug/kg	N/A				ND		1.4	ug/kg	ND		1.3	ug/kg
Bromodichloromethane	NA	NA	NA	ND		1.3	ug/kg	N/A				ND		1.4	ug/kg	ND		1.3	ug/kg
Bromoform	NA	NA	NA	ND		1.3	ug/kg	N/A				ND		1.4	ug/kg	ND		1.3	ug/kg
Bromomethane	NA	NA	NA	ND		1.3	ug/kg	N/A				ND		1.4	ug/kg	ND		1.3	ug/kg
Carbon Disulfide	2,700	NA	NA	ND		1.3	ug/kg	N/A				ND		1.4	ug/kg	ND		1.3	ug/kg
Carbon Tetrachloride	760	22,000	760	ND		1.3	ug/kg	N/A				ND		1.4	ug/kg	ND		1.3	ug/kg
Chlorobenzene	1,100	500,000	1,100	ND		1.3	ug/kg	N/A				ND		1.4	ug/kg	ND		1.3	ug/kg
Chloroethane	1,900	NA	NA	ND		1.3	ug/kg	N/A				ND		1.4	ug/kg	ND		1.3	ug/kg
Chloroform	370	350,000	370	ND		1.3	ug/kg	N/A				ND		1.4	ug/kg	ND		1.3	ug/kg
Chloromethane	NA	NA	NA	ND		1.3	ug/kg	N/A				ND		1.4	ug/kg	ND		1.3	ug/kg
cis-1,2-Dichloroethene	250	NA	NA	ND		1.3	ug/kg	N/A				ND		1.4	ug/kg	ND		1.3	ug/kg
cis-1,3-Dichloropropene	NA	NA	NA	ND		1.3	ug/kg	N/A				ND		1.4	ug/kg	ND		1.3	ug/kg
Cyclohexane	NA	NA	NA	ND		1.3	ug/kg	N/A				ND		1.4	ug/kg	ND		1.3	ug/kg
Dibromochloromethane	NA	NA	NA	ND		1.3	ug/kg	N/A				ND		1.4	ug/kg	ND		1.3	ug/kg
Dichlorodifluoromethane	NA	NA	NA	ND		13	ug/kg	N/A				ND		14	ug/kg	ND		13	ug/kg
Ethylbenzene	1,000	390,000	1,000	ND		1.3	ug/kg	N/A				ND		1.4	ug/kg	ND		1.3	ug/kg
Isopropylbenzene	NA	NA	NA	ND		1.3	ug/kg	N/A				ND		1.4	ug/kg	ND		1.3	ug/kg
m&p-Xylenes	260	NA	NA	ND		2.7	ug/kg	N/A				ND		2.7	ug/kg	ND		2.5	ug/kg
Methylcyclohexane	NA	NA	NA	ND		1.3	ug/kg	N/A				ND		1.4	ug/kg	ND		1.3	ug/kg
Methylene Chloride	50	500,000	50	ND		1.3	ug/kg	N/A				ND		1.4	ug/kg	ND		1.3	ug/kg
Methyl-tert-butyl Ether	930	NA	NA	ND		1.3	ug/kg	N/A				ND		1.4	ug/kg	ND		1.3	ug/kg
o-Xylene	260	NA	NA	ND		1.3	ug/kg	N/A				ND		1.4	ug/kg	ND		1.3	ug/kg
Styrene	NA	NA	NA	ND		1.3	ug/kg	N/A				ND		1.4	ug/kg	ND		1.3	ug/kg
tert-Butyl Alcohol	NA	NA	NA	ND		6.7	ug/kg	N/A				ND		6.8	ug/kg	ND		6.3	ug/kg
Tetrachloroethene	1,300	150,000	1,300	ND		1.3	ug/kg	N/A				ND		1.4	ug/kg	ND		1.3	ug/kg
Toluene	700	500,000	700	ND		1.3	ug/kg	N/A				ND		1.4	ug/kg	ND		1.3	ug/kg
trans-1,2-Dichloroethene	190	NA	NA	ND		1.3	ug/kg	N/A				ND		1.4	ug/kg	ND		1.3	ug/kg
trans-1,3-Dichloropropene	NA	NA	NA	ND		1.3	ug/kg	N/A				ND		1.4	ug/kg	ND		1.3	ug/kg
Trichloroethene	470	200,000	470	ND		1.3	ug/kg	N/A				ND		1.4	ug/kg	ND		1.3	ug/kg
Trichlorofluoromethane	NA	NA	NA	ND		1.3	ug/kg	N/A				ND		1.4	ug/kg	ND		1.3	ug/kg
Vinyl Chloride	20	13,000	20	ND		1.3	ug/kg	N/A				ND		1.4	ug/kg	ND		1.3	ug/kg

Shaded values indicate a Track 1 SCO exceedance
NA - Not Applicable
N/A - Not Analyzed
ND - Not Detected
SB - Soil Background
RL - Laboratory Reporting Limit

TABLE 2 - EXCEEDANCES OF SOIL/FILL SCOs
CONCORD HOTEL AND RESORT
TOWN OF THOMPSON, NEW YORK
NYSDEC BCP No. C353008
SESI CONSULTING ENGINEERS PROJECT # 7180

TestName	Unrestricted Track 1 SCO (ug/kg)	Protection of Public Health Commercial (ug/kg)	Protection of Groundwater (ug/kg)	OU-1A-11ARA Z0823218RA 8/19/08				OU-1A-11A x10 Z0823218 8/19/08				OU-1A-11B Z0823219 8/19/08				OU-1A-12A Z0823308 8/20/08			
				Result	Flg	RL	Units	Result	Flg	RL	Units	Result	Flg	RL	Units	Result	Flg	RL	Units
Semi Volatile Organics																			
(3 & 4)-Methylphenol	330	NA	NA	N/A				ND		540	ug/kg	ND		51	ug/kg	ND		69	ug/kg
1,2,4-Trichlorobenzene	3,400	NA	NA	N/A				ND		540	ug/kg	ND		51	ug/kg	ND		69	ug/kg
2,4,5-Trichlorophenol	100	NA	NA	N/A				ND		540	ug/kg	ND		51	ug/kg	ND		69	ug/kg
2,4,6-Trichlorophenol	NA	NA	NA	N/A				ND		540	ug/kg	ND		51	ug/kg	ND		69	ug/kg
2,4-Dichlorophenol	400	NA	NA	N/A				ND		540	ug/kg	ND		51	ug/kg	ND		69	ug/kg
2,4-Dimethylphenol	NA	NA	NA	N/A				ND		540	ug/kg	ND		51	ug/kg	ND		69	ug/kg
2,4-Dinitrophenol	200	NA	NA	N/A				ND		11,000	ug/kg	ND		1,000	ug/kg	ND		1,400	ug/kg
2,4-Dinitrotoluene	NA	NA	NA	N/A				ND		540	ug/kg	ND		51	ug/kg	ND		69	ug/kg
2,6-Dinitrotoluene	1,000	NA	NA	N/A				ND		540	ug/kg	ND		51	ug/kg	ND		69	ug/kg
2-Chloronaphthalene	NA	NA	NA	N/A				ND		540	ug/kg	ND		51	ug/kg	ND		69	ug/kg
2-Chlorophenol	800	NA	NA	N/A				ND		540	ug/kg	ND		51	ug/kg	ND		69	ug/kg
2-Methyl-4,6-dinitrophenol	NA	NA	NA	N/A				ND		11,000	ug/kg	ND		1,000	ug/kg	ND		1,400	ug/kg
2-Methylnaphthalene	36,400	NA	NA	N/A				ND		540	ug/kg	ND		51	ug/kg	ND		69	ug/kg
2-Methylphenol	330	NA	NA	N/A				ND		540	ug/kg	ND		51	ug/kg	ND		69	ug/kg
2-Nitroaniline	430	NA	NA	N/A				ND		540	ug/kg	ND		51	ug/kg	ND		69	ug/kg
2-Nitrophenol	330	NA	NA	N/A				ND		540	ug/kg	ND		51	ug/kg	ND		69	ug/kg
3,3'-Dichlorobenzidine	NA	NA	NA	N/A				ND		540	ug/kg	ND		51	ug/kg	ND		69	ug/kg
3-Nitroaniline	500	NA	NA	N/A				ND		540	ug/kg	ND		51	ug/kg	ND		69	ug/kg
4-Bromophenyl-phenylether	NA	NA	NA	N/A				ND		540	ug/kg	ND		51	ug/kg	ND		69	ug/kg
4-Chloro-3-methylphenol	240	NA	NA	N/A				ND		540	ug/kg	ND		51	ug/kg	ND		69	ug/kg
4-Chloroaniline	220	NA	NA	N/A				ND		540	ug/kg	ND		51	ug/kg	ND		69	ug/kg
4-Chlorophenyl-phenylether	NA	NA	NA	N/A				ND		540	ug/kg	ND		51	ug/kg	ND		69	ug/kg
4-Nitroaniline	NA	NA	NA	N/A				ND		540	ug/kg	ND		51	ug/kg	ND		69	ug/kg
4-Nitrophenol	100	NA	NA	N/A				ND		540	ug/kg	ND		51	ug/kg	ND		69	ug/kg
Acenaphthene	20,000	500,000	98,000	N/A				ND		540	ug/kg	ND		51	ug/kg	ND		69	ug/kg
Acenaphthylene	100,000	500,000	107,000	N/A				ND		540	ug/kg	ND		51	ug/kg	84		69	ug/kg
Aniline	100	NA	NA	N/A				ND		540	ug/kg	ND		51	ug/kg	ND		69	ug/kg
Anthracene	100,000	500,000	1,000,000	N/A				ND		540	ug/kg	ND		51	ug/kg	ND		69	ug/kg
Benzo(a)anthracene	1,000	5,600	1,000	N/A				610		540	ug/kg	ND		51	ug/kg	70		69	ug/kg
Benzo(a)pyrene	1,000	1,000	22,000	N/A				ND		540	ug/kg	ND		51	ug/kg	160		69	ug/kg
Benzo(b)fluoranthene	1,000	5,600	1,700	N/A				ND		540	ug/kg	ND		51	ug/kg	190		69	ug/kg
Benzo(g,h,i)perylene	100,000	500,000	1,000,000	N/A				ND		540	ug/kg	ND		51	ug/kg	300		69	ug/kg
Benzo(k)fluoranthene	800	56,000	1,700	N/A				ND		540	ug/kg	ND		51	ug/kg	72		69	ug/kg
bis(2-Chloroethoxy)methane	NA	NA	NA	N/A				ND		540	ug/kg	ND		51	ug/kg	ND		69	ug/kg
bis(2-Chloroethyl)ether	NA	NA	NA	N/A				ND		540	ug/kg	ND		51	ug/kg	ND		69	ug/kg
bis(2-Ethylhexyl)phthalate	50,000	NA	NA	N/A				ND		1,100	ug/kg	ND		100	ug/kg	ND		140	ug/kg
Butylbenzylphthalate	50,000	NA	NA	N/A				ND		540	ug/kg	ND		51	ug/kg	ND		69	ug/kg
Carbazole	NA	NA	NA	N/A				ND		540	ug/kg	ND		51	ug/kg	ND		69	ug/kg
Chrysene	1,000	56,000	1,000	N/A				ND		540	ug/kg	ND		51	ug/kg	82		69	ug/kg
Dibenz(a,h)anthracene	330	560	1,000,000	N/A				ND		540	ug/kg	ND		51	ug/kg	ND		69	ug/kg

Shaded values indicate a Track 1 SCO exceedance
NA - Not Applicable
N/A - Not Analyzed
ND - Not Detected
SB - Soil Background
RL - Laboratory Reporting Limit

TABLE 2 - EXCEEDANCES OF SOIL/FILL SCOs
CONCORD HOTEL AND RESORT
TOWN OF THOMPSON, NEW YORK
NYSDEC BCP No. C353008
SESI CONSULTING ENGINEERS PROJECT # 7180

TestName	Unrestricted Track 1 SCO (ug/kg)	Protection of Public Health Commercial (ug/kg)	Protection of Groundwater (ug/kg)	OU-1A-11ARA Z0823218RA 8/19/08				OU-1A-11A x10 Z0823218 8/19/08				OU-1A-11B Z0823219 8/19/08				OU-1A-12A Z0823308 8/20/08			
				Result	Flg	RL	Units	Result	Flg	RL	Units	Result	Flg	RL	Units	Result	Flg	RL	Units
Dibenzofuran	7,000	NA	NA	N/A				ND		540	ug/kg	ND		51	ug/kg	ND		69	ug/kg
Diethylphthalate	7,100	NA	NA	N/A				ND		540	ug/kg	ND		51	ug/kg	ND		69	ug/kg
Dimethylphthalate	2,000	NA	NA	N/A				ND		540	ug/kg	ND		51	ug/kg	ND		69	ug/kg
Di-n-butylphthalate	8,100	NA	NA	N/A				ND		540	ug/kg	ND		51	ug/kg	ND		69	ug/kg
Di-n-Octylphthalate	50,000	NA	NA	N/A				ND		540	ug/kg	ND		51	ug/kg	ND		69	ug/kg
Diphenylamine	NA	NA	NA	N/A				ND		540	ug/kg	ND		51	ug/kg	ND		69	ug/kg
Fluoranthene	100,000	500,000	1,000,000	N/A				ND		540	ug/kg	ND		51	ug/kg	87		69	ug/kg
Fluorene	30,000	500,000	386,000	N/A				ND		540	ug/kg	ND		51	ug/kg	ND		69	ug/kg
Hexachlorobenzene	330	6,000	3,200	N/A				ND		540	ug/kg	ND		51	ug/kg	ND		69	ug/kg
Hexachlorobutadiene	NA	NA	NA	N/A				ND		540	ug/kg	ND		51	ug/kg	ND		69	ug/kg
Hexachlorocyclopentadiene	NA	NA	NA	N/A				ND		540	ug/kg	ND		51	ug/kg	ND		69	ug/kg
Hexachloroethane	NA	NA	NA	N/A				ND		540	ug/kg	ND		51	ug/kg	ND		69	ug/kg
Indeno(1,2,3-cd)pyrene	500	5,600	8,200	N/A				ND		540	ug/kg	ND		51	ug/kg	180		69	ug/kg
Isophorone	4,400	NA	NA	N/A				ND		540	ug/kg	ND		51	ug/kg	ND		69	ug/kg
Naphthalene	12,000	500,000	12,000	N/A				ND		540	ug/kg	ND		51	ug/kg	ND		69	ug/kg
Nitrobenzene	200	NA	NA	N/A				ND		540	ug/kg	ND		51	ug/kg	ND		69	ug/kg
n-Nitroso-di-n-propylamine	NA	NA	NA	N/A				ND		540	ug/kg	ND		51	ug/kg	ND		69	ug/kg
Pentachlorophenol	800	6,700	800	N/A				ND		540	ug/kg	ND		51	ug/kg	ND		69	ug/kg
Phenanthrene	100,000	500,000	1,000,000	N/A				ND		540	ug/kg	ND		51	ug/kg	ND		69	ug/kg
Phenol	330	500,000	330	N/A				ND		540	ug/kg	ND		51	ug/kg	ND		69	ug/kg
Pyrene	100,000	500,000	1,000,000	N/A				ND		540	ug/kg	ND		51	ug/kg	94		69	ug/kg
TPH	NA	NA	NA	N/A				1700000		97,000	ug/kg	ND		82,000	ug/kg	ND		110,000	ug/kg
Pesticides																			
4,4'-DDD	3.3	92,000	14,000	N/A				ND		2.1	ug/kg	ND		2.1	ug/kg	N/A			
4,4'-DDE	3.3	62,000	17,000	N/A				ND		2.1	ug/kg	ND		2.1	ug/kg	N/A			
4,4'-DDT	3.3	47,000	136,000	N/A				ND		2.1	ug/kg	ND		2.1	ug/kg	N/A			
Aldrin	5	680	190	N/A				ND		2.1	ug/kg	ND		2.1	ug/kg	N/A			
alpha-BHC	20	3,400	20	N/A				ND		4.3	ug/kg	ND		4.1	ug/kg	N/A			
alpha-Chlordane	94	24,000	2,900	N/A				ND		4.3	ug/kg	ND		4.1	ug/kg	N/A			
beta-BHC	36	3,000	90	N/A				ND		4.3	ug/kg	ND		4.1	ug/kg	N/A			
delta-BHC	40	500,000	250	N/A				ND		4.3	ug/kg	ND		4.1	ug/kg	N/A			
Dieldrin	5	1,400	100	N/A				ND		2.1	ug/kg	ND		2.1	ug/kg	N/A			
Endosulfan I	2,400	200,000	102,000	N/A				ND		17	ug/kg	ND		16	ug/kg	N/A			
Endosulfan II	2,400	200,000	102,000	N/A				ND		17	ug/kg	ND		16	ug/kg	N/A			
Endosulfan sulfate	2,400	200,000	1,000,000	N/A				ND		17	ug/kg	ND		16	ug/kg	N/A			
Endrin	14	89,000	60	N/A				ND		4.3	ug/kg	ND		4.1	ug/kg	N/A			
Endrin aldehyde	NA	NA	NA	N/A				ND		17	ug/kg	ND		16	ug/kg	N/A			
Endrin ketone	NA	NA	NA	N/A				ND		17	ug/kg	ND		16	ug/kg	N/A			
gamma-BHC	100	NA	NA	N/A				ND		4.3	ug/kg	ND		4.1	ug/kg	N/A			
gamma-Chlordane	94	NA	NA	N/A				ND		4.3	ug/kg	ND		4.1	ug/kg	N/A			
Heptachlor	42	15,000	380	N/A				ND		4.3	ug/kg	ND		4.1	ug/kg	N/A			
Heptachlor epoxide	20	NA	NA	N/A				ND		4.3	ug/kg	ND		4.1	ug/kg	N/A			
Methoxychlor	10,000	NA	NA	N/A				ND		17	ug/kg	ND		16	ug/kg	N/A			

Shaded values indicate a Track 1 SCO exceedance
NA - Not Applicable
N/A - Not Analyzed
ND - Not Detected
SB - Soil Background
RL - Laboratory Reporting Limit

TABLE 2 - EXCEEDANCES OF SOIL/FILL SCOs
CONCORD HOTEL AND RESORT
TOWN OF THOMPSON, NEW YORK
NYSDEC BCP No. C353008
SESI CONSULTING ENGINEERS PROJECT # 7180

TestName	Unrestricted Track 1 SCO (ug/kg)	Protection of Public Health Commercial (ug/kg)	Protection of Groundwater (ug/kg)	OU-1A-11ARA Z0823218RA 8/19/08				OU-1A-11A x10 Z0823218 8/19/08				OU-1A-11B Z0823219 8/19/08				OU-1A-12A Z0823308 8/20/08			
				Result	Flg	RL	Units	Result	Flg	RL	Units	Result	Flg	RL	Units	Result	Flg	RL	Units
PCB's																			
Aroclor 1221-1	100	1,000	3,200	N/A				N/A				ND		51	ug/kg	N/A			
Aroclor 1221-2	100	1,000	3,200	N/A				N/A				ND		51	ug/kg	N/A			
Aroclor 1221-3	100	1,000	3,200	N/A				N/A				ND		51	ug/kg	N/A			
Aroclor 1232-1	100	1,000	3,200	N/A				N/A				ND		51	ug/kg	N/A			
Aroclor 1232-2	100	1,000	3,200	N/A				N/A				ND		51	ug/kg	N/A			
Aroclor 1232-3	100	1,000	3,200	N/A				N/A				ND		51	ug/kg	N/A			
Aroclor 1242-1	100	1,000	3,200	N/A				N/A				ND		51	ug/kg	N/A			
Aroclor 1242-2	100	1,000	3,200	N/A				N/A				ND		51	ug/kg	N/A			
Aroclor 1242-3	100	1,000	3,200	N/A				N/A				ND		51	ug/kg	N/A			
Aroclor 1248-1	100	1,000	3,200	N/A				N/A				ND		51	ug/kg	N/A			
Aroclor 1248-2	100	1,000	3,200	N/A				N/A				ND		51	ug/kg	N/A			
Aroclor 1248-3	100	1,000	3,200	N/A				N/A				ND		51	ug/kg	N/A			
Aroclor 1254-1	100	1,000	3,200	N/A				N/A				ND		51	ug/kg	N/A			
Aroclor 1254-2	100	1,000	3,200	N/A				N/A				ND		51	ug/kg	N/A			
Aroclor 1254-3	100	1,000	3,200	N/A				N/A				ND		51	ug/kg	N/A			
Aroclor 1016-1	100	1,000	3,200	N/A				N/A				ND		51	ug/kg	N/A			
Aroclor 1016-2	100	1,000	3,200	N/A				N/A				ND		51	ug/kg	N/A			
Aroclor 1016-3	100	1,000	3,200	N/A				N/A				ND		51	ug/kg	N/A			
Aroclor 1260-1	100	1,000	3,200	N/A				N/A				ND		51	ug/kg	N/A			
Aroclor 1260-2	100	1,000	3,200	N/A				N/A				ND		51	ug/kg	N/A			
Aroclor 1260-3	100	1,000	3,200	N/A				N/A				ND		51	ug/kg	N/A			
Metals	(mg/kg)	(mg/kg)	(mg/kg)																
Mercury	0.18	2.8	0.18	N/A				N/A				ND		0.1	mg/Kg	N/A			
Aluminum	SB	NA	NA	N/A				N/A				3830		1.09	mg/Kg	N/A			
Antimony	SB	NA	NA	N/A				N/A				ND		1.09	mg/Kg	N/A			
Arsenic	13	16	16	N/A				N/A				1.57		1.09	mg/Kg	N/A			
Barium	350	400	820	N/A				N/A				19.6		1.09	mg/Kg	N/A			
Beryllium	7.2	590	47	N/A				N/A				ND		0.545	mg/Kg	N/A			
Cadmium	2.5	9.3	7.5	N/A				N/A				ND		0.545	mg/Kg	N/A			
Calcium	SB	NA	NA	N/A				N/A				671		2.18	mg/Kg	N/A			
Chromium	30	1,500	NA	N/A				N/A				4.03		0.545	mg/Kg	N/A			
Cobalt	30 or SB	NA	NA	N/A				N/A				4.68		1.09	mg/Kg	N/A			
Copper	50	270	1,720	N/A				N/A				15.7		1.09	mg/Kg	N/A			
Iron	2,000 or SB	NA	NA	N/A				N/A				8660		1.09	mg/Kg	N/A			
Lead	63	1,000	450	N/A				N/A				6.34		1.09	mg/Kg	N/A			
Magnesium	SB	NA	NA	N/A				N/A				1670		2.18	mg/Kg	N/A			
Manganese	1,600	10,000	2,000	N/A				N/A				199		1.09	mg/Kg	N/A			
Nickel	30	310	130	N/A				N/A				6.3		1.09	mg/Kg	N/A			
Potassium	SB	NA	NA	N/A				N/A				446		3.27	mg/Kg	N/A			
Selenium	3.9	1,500	4	N/A				N/A				ND		1.09	mg/Kg	N/A			
Silver	2	1,500	8.3	N/A				N/A				ND		1.09	mg/Kg	N/A			
Sodium	SB	NA	NA	N/A				N/A				ND		5.45	mg/Kg	N/A			
Thallium	SB	NA	NA	N/A				N/A				ND		1.09	mg/Kg	N/A			
Vanadium	150 or SB	NA	NA	N/A				N/A				4.24		2.18	mg/Kg	N/A			
Zinc	109	10,000	2,480	N/A				N/A				32.5		2.18	mg/Kg	N/A			
Other Parameters																			
Cyanide	27	27	40	N/A				N/A				ND		1	mg/kg	N/A			

Shaded values indicate a Track 1 SCO exceedance
NA - Not Applicable
N/A - Not Analyzed
ND - Not Detected
SB - Soil Background
RL - Laboratory Reporting Limit

TABLE 2 - EXCEEDANCES OF SOIL/FILL SCOs
CONCORD HOTEL AND RESORT
TOWN OF THOMPSON, NEW YORK
NYSDEC BCP No. C353008
SESI CONSULTING ENGINEERS PROJECT # 7180

TestName	Unrestricted Track 1 SCO (ug/kg)	Protection of Public Health Commercial (ug/kg)	Protection of Groundwater (ug/kg)	OU-1A-12B Z0823309 8/20/08				OU-1A-13A Z0823306 8/20/08				OU-1A-13Ax4 Z0823306 8/20/08				OU-1A-13B Z0823307 8/20/08			
				Result	Flg	RL	Units					Result	Flg	RL	Units	Result	Flg	RL	Units
Volatile Organics																			
1,1,1-Trichloroethane	680	500,000	680	ND		1.2	ug/kg	ND		1.3	ug/kg	N/A				ND		1.2	ug/kg
1,1,2,2-Tetrachloroethane	600	NA	NA	ND		1.2	ug/kg	ND		1.3	ug/kg	N/A				ND		1.2	ug/kg
1,1,2-Trichloroethane	NA	NA	NA	ND		1.2	ug/kg	ND		1.3	ug/kg	N/A				ND		1.2	ug/kg
1,1,2-Trichlorotrifluoroethane	6,000	NA	NA	ND		1.2	ug/kg	ND		1.3	ug/kg	N/A				ND		1.2	ug/kg
1,1-Dichloroethane	270	240,000	270	ND		1.2	ug/kg	ND		1.3	ug/kg	N/A				ND		1.2	ug/kg
1,1-Dichloroethene	330	500,000	330	ND		1.2	ug/kg	ND		1.3	ug/kg	N/A				ND		1.2	ug/kg
1,2-Dibromo-3-chloropropane	NA	NA	NA	ND		1.2	ug/kg	ND		1.3	ug/kg	N/A				ND		1.2	ug/kg
1,2-Dibromoethane	NA	NA	NA	ND		1.2	ug/kg	ND		1.3	ug/kg	N/A				ND		1.2	ug/kg
1,2-Dichlorobenzene	1,100	500,000	1,100	ND		1.2	ug/kg	ND		1.3	ug/kg	N/A				ND		1.2	ug/kg
1,2-Dichloroethane	20	30,000	20	ND		1.2	ug/kg	ND		1.3	ug/kg	N/A				ND		1.2	ug/kg
1,2-Dichloropropane	NA	NA	NA	ND		1.2	ug/kg	ND		1.3	ug/kg	N/A				ND		1.2	ug/kg
1,3-Dichlorobenzene	2,400	280,000	2,400	ND		1.2	ug/kg	ND		1.3	ug/kg	N/A				ND		1.2	ug/kg
1,4-Dichlorobenzene	1,800	130,000	1,800	ND		1.2	ug/kg	ND		1.3	ug/kg	N/A				ND		1.2	ug/kg
2-Butanone	120	NA	NA	ND		6.1	ug/kg	ND		6.3	ug/kg	N/A				ND		6.2	ug/kg
2-Hexanone	NA	NA	NA	ND		6.1	ug/kg	ND		6.3	ug/kg	N/A				ND		6.2	ug/kg
4-Methyl-2-pentanone	1,000	NA	NA	ND		6.1	ug/kg	ND		6.3	ug/kg	N/A				ND		6.2	ug/kg
Acetone	50	500,000	50	ND		31	ug/kg	ND		31	ug/kg	N/A				ND		31	ug/kg
Benzene	60	44,000	60	ND		1.2	ug/kg	ND		1.3	ug/kg	N/A				ND		1.2	ug/kg
Bromodichloromethane	NA	NA	NA	ND		1.2	ug/kg	ND		1.3	ug/kg	N/A				ND		1.2	ug/kg
Bromoform	NA	NA	NA	ND		1.2	ug/kg	ND		1.3	ug/kg	N/A				ND		1.2	ug/kg
Bromomethane	NA	NA	NA	ND		1.2	ug/kg	ND		1.3	ug/kg	N/A				ND		1.2	ug/kg
Carbon Disulfide	2,700	NA	NA	ND		1.2	ug/kg	ND		1.3	ug/kg	N/A				ND		1.2	ug/kg
Carbon Tetrachloride	760	22,000	760	ND		1.2	ug/kg	ND		1.3	ug/kg	N/A				ND		1.2	ug/kg
Chlorobenzene	1,100	500,000	1,100	ND		1.2	ug/kg	ND		1.3	ug/kg	N/A				ND		1.2	ug/kg
Chloroethane	1,900	NA	NA	ND		1.2	ug/kg	ND		1.3	ug/kg	N/A				ND		1.2	ug/kg
Chloroform	370	350,000	370	ND		1.2	ug/kg	ND		1.3	ug/kg	N/A				ND		1.2	ug/kg
Chloromethane	NA	NA	NA	ND		1.2	ug/kg	ND		1.3	ug/kg	N/A				ND		1.2	ug/kg
cis-1,2-Dichloroethene	250	NA	NA	ND		1.2	ug/kg	ND		1.3	ug/kg	N/A				ND		1.2	ug/kg
cis-1,3-Dichloropropene	NA	NA	NA	ND		1.2	ug/kg	ND		1.3	ug/kg	N/A				ND		1.2	ug/kg
Cyclohexane	NA	NA	NA	ND		1.2	ug/kg	ND		1.3	ug/kg	N/A				ND		1.2	ug/kg
Dibromochloromethane	NA	NA	NA	ND		1.2	ug/kg	ND		1.3	ug/kg	N/A				ND		1.2	ug/kg
Dichlorodifluoromethane	NA	NA	NA	ND		12	ug/kg	ND		13	ug/kg	N/A				ND		12	ug/kg
Ethylbenzene	1,000	390,000	1,000	ND		1.2	ug/kg	ND		1.3	ug/kg	N/A				ND		1.2	ug/kg
Isopropylbenzene	NA	NA	NA	ND		1.2	ug/kg	ND		1.3	ug/kg	N/A				ND		1.2	ug/kg
m&p-Xylenes	260	NA	NA	ND		2.5	ug/kg	ND		2.5	ug/kg	N/A				ND		2.5	ug/kg
Methylcyclohexane	NA	NA	NA	ND		1.2	ug/kg	ND		1.3	ug/kg	N/A				ND		1.2	ug/kg
Methylene Chloride	50	500,000	50	ND		1.2	ug/kg	ND		1.3	ug/kg	N/A				ND		1.2	ug/kg
Methyl-tert-butyl Ether	930	NA	NA	ND		1.2	ug/kg	ND		1.3	ug/kg	N/A				ND		1.2	ug/kg
o-Xylene	260	NA	NA	ND		1.2	ug/kg	ND		1.3	ug/kg	N/A				ND		1.2	ug/kg
Styrene	NA	NA	NA	ND		1.2	ug/kg	ND		1.3	ug/kg	N/A				ND		1.2	ug/kg
tert-Butyl Alcohol	NA	NA	NA	ND		6.1	ug/kg	ND		6.3	ug/kg	N/A				ND		6.2	ug/kg
Tetrachloroethene	1,300	150,000	1,300	ND		1.2	ug/kg	ND		1.3	ug/kg	N/A				ND		1.2	ug/kg
Toluene	700	500,000	700	ND		1.2	ug/kg	ND		1.3	ug/kg	N/A				ND		1.2	ug/kg
trans-1,2-Dichloroethene	190	NA	NA	ND		1.2	ug/kg	ND		1.3	ug/kg	N/A				ND		1.2	ug/kg
trans-1,3-Dichloropropene	NA	NA	NA	ND		1.2	ug/kg	ND		1.3	ug/kg	N/A				ND		1.2	ug/kg
Trichloroethene	470	200,000	470	ND		1.2	ug/kg	ND		1.3	ug/kg	N/A				ND		1.2	ug/kg
Trichlorofluoromethane	NA	NA	NA	ND		1.2	ug/kg	ND		1.3	ug/kg	N/A				ND		1.2	ug/kg
Vinyl Chloride	20	13,000	20	ND		1.2	ug/kg	ND		1.3	ug/kg	N/A				ND		1.2	ug/kg

Shaded values indicate a Track 1 SCO exceedance
NA - Not Applicable
N/A - Not Analyzed
ND - Not Detected
SB - Soil Background
RL - Laboratory Reporting Limit

TABLE 2 - EXCEEDANCES OF SOIL/FILL SCOs
CONCORD HOTEL AND RESORT
TOWN OF THOMPSON, NEW YORK
NYSDEC BCP No. C353008
SESI CONSULTING ENGINEERS PROJECT # 7180

TestName	Unrestricted Track 1 SCO (ug/kg)	Protection of Public Health Commercial (ug/kg)	Protection of Groundwater (ug/kg)	OU-1A-12B Z0823309 8/20/08				OU-1A-13A Z0823306 8/20/08	OU-1A-13Ax4 Z0823306 8/20/08				OU-1A-13B Z0823307 8/20/08			
				Result	Flg	RL	Units		Result	Flg	RL	Units	Result	Flg	RL	Units
Semi Volatile Organics																
(3 & 4)-Methylphenol	330	NA	NA	ND		67	ug/kg	N/A	ND		260	ug/kg	ND		61	ug/kg
1,2,4-Trichlorobenzene	3,400	NA	NA	ND		67	ug/kg	N/A	ND		260	ug/kg	ND		61	ug/kg
2,4,5-Trichlorophenol	100	NA	NA	ND		67	ug/kg	N/A	ND		260	ug/kg	ND		61	ug/kg
2,4,6-Trichlorophenol	NA	NA	NA	ND		67	ug/kg	N/A	ND		260	ug/kg	ND		61	ug/kg
2,4-Dichlorophenol	400	NA	NA	ND		67	ug/kg	N/A	ND		260	ug/kg	ND		61	ug/kg
2,4-Dimethylphenol	NA	NA	NA	ND		67	ug/kg	N/A	ND		260	ug/kg	ND		61	ug/kg
2,4-Dinitrophenol	200	NA	NA	ND		1,300	ug/kg	N/A	ND		5,300	ug/kg	ND		1,200	ug/kg
2,4-Dinitrotoluene	NA	NA	NA	ND		67	ug/kg	N/A	ND		260	ug/kg	ND		61	ug/kg
2,6-Dinitrotoluene	1,000	NA	NA	ND		67	ug/kg	N/A	ND		260	ug/kg	ND		61	ug/kg
2-Chloronaphthalene	NA	NA	NA	ND		67	ug/kg	N/A	ND		260	ug/kg	ND		61	ug/kg
2-Chlorophenol	800	NA	NA	ND		67	ug/kg	N/A	ND		260	ug/kg	ND		61	ug/kg
2-Methyl-4,6-dinitrophenol	NA	NA	NA	ND		1,300	ug/kg	N/A	ND		5,300	ug/kg	ND		1,200	ug/kg
2-Methylnaphthalene	36,400	NA	NA	ND		67	ug/kg	N/A	ND		260	ug/kg	ND		61	ug/kg
2-Methylphenol	330	NA	NA	ND		67	ug/kg	N/A	ND		260	ug/kg	ND		61	ug/kg
2-Nitroaniline	430	NA	NA	ND		67	ug/kg	N/A	ND		260	ug/kg	ND		61	ug/kg
2-Nitrophenol	330	NA	NA	ND		67	ug/kg	N/A	ND		260	ug/kg	ND		61	ug/kg
3,3'-Dichlorobenzidine	NA	NA	NA	ND		67	ug/kg	N/A	ND		260	ug/kg	ND		61	ug/kg
3-Nitroaniline	500	NA	NA	ND		67	ug/kg	N/A	ND		260	ug/kg	ND		61	ug/kg
4-Bromophenyl-phenylether	NA	NA	NA	ND		67	ug/kg	N/A	ND		260	ug/kg	ND		61	ug/kg
4-Chloro-3-methylphenol	240	NA	NA	ND		67	ug/kg	N/A	ND		260	ug/kg	ND		61	ug/kg
4-Chloroaniline	220	NA	NA	ND		67	ug/kg	N/A	ND		260	ug/kg	ND		61	ug/kg
4-Chlorophenyl-phenylether	NA	NA	NA	ND		67	ug/kg	N/A	ND		260	ug/kg	ND		61	ug/kg
4-Nitroaniline	NA	NA	NA	ND		67	ug/kg	N/A	ND		260	ug/kg	ND		61	ug/kg
4-Nitrophenol	100	NA	NA	ND		67	ug/kg	N/A	ND		260	ug/kg	ND		61	ug/kg
Acenaphthene	20,000	500,000	98,000	ND		67	ug/kg	N/A	ND		260	ug/kg	ND		61	ug/kg
Acenaphthylene	100,000	500,000	107,000	ND		67	ug/kg	N/A	450		260	ug/kg	ND		61	ug/kg
Aniline	100	NA	NA	ND		67	ug/kg	N/A	ND		260	ug/kg	ND		61	ug/kg
Anthracene	100,000	500,000	1,000,000	ND		67	ug/kg	N/A	ND		260	ug/kg	ND		61	ug/kg
Benzo(a)anthracene	1,000	5,600	1,000	ND		67	ug/kg	N/A	550		260	ug/kg	ND		61	ug/kg
Benzo(a)pyrene	1,000	1,000	22,000	ND		67	ug/kg	N/A	1,400		260	ug/kg	ND		61	ug/kg
Benzo(b)fluoranthene	1,000	5,600	1,700	ND		67	ug/kg	N/A	1,400		260	ug/kg	ND		61	ug/kg
Benzo(g,h,i)perylene	100,000	500,000	1,000,000	ND		67	ug/kg	N/A	1,700		260	ug/kg	ND		61	ug/kg
Benzo(k)fluoranthene	800	56,000	1,700	ND		67	ug/kg	N/A	620		260	ug/kg	ND		61	ug/kg
bis(2-Chloroethoxy)methane	NA	NA	NA	ND		67	ug/kg	N/A	ND		260	ug/kg	ND		61	ug/kg
bis(2-Chloroethyl)ether	NA	NA	NA	ND		67	ug/kg	N/A	ND		260	ug/kg	ND		61	ug/kg
bis(2-Ethylhexyl)phthalate	50,000	NA	NA	ND		130	ug/kg	N/A	ND		530	ug/kg	ND		120	ug/kg
Butylbenzylphthalate	50,000	NA	NA	ND		67	ug/kg	N/A	ND		260	ug/kg	ND		61	ug/kg
Carbazole	NA	NA	NA	ND		67	ug/kg	N/A	ND		260	ug/kg	ND		61	ug/kg
Chrysene	1,000	56,000	1,000	ND		67	ug/kg	N/A	590		260	ug/kg	ND		61	ug/kg
Dibenz(a,h)anthracene	330	560	1,000,000	ND		67	ug/kg	N/A	ND		260	ug/kg	ND		61	ug/kg

Shaded values indicate a Track 1 SCO exceedance
NA - Not Applicable
N/A - Not Analyzed
ND - Not Detected
SB - Soil Background
RL - Laboratory Reporting Limit

TABLE 2 - EXCEEDANCES OF SOIL/FILL SCOs
CONCORD HOTEL AND RESORT
TOWN OF THOMPSON, NEW YORK
NYSDEC BCP No. C353008
SESI CONSULTING ENGINEERS PROJECT # 7180

TestName	Unrestricted Track 1 SCO (ug/kg)	Protection of Public Health Commercial (ug/kg)	Protection of Groundwater (ug/kg)	OU-1A-12B Z0823309 8/20/08				OU-1A-13A Z0823306 8/20/08	OU-1A-13Ax4 Z0823306 8/20/08				OU-1A-13B Z0823307 8/20/08			
				Result	Flg	RL	Units		Result	Flg	RL	Units	Result	Flg	RL	Units
Dibenzofuran	7,000	NA	NA	ND		67	ug/kg	N/A	ND		260	ug/kg	ND		61	ug/kg
Diethylphthalate	7,100	NA	NA	ND		67	ug/kg	N/A	ND		260	ug/kg	ND		61	ug/kg
Dimethylphthalate	2,000	NA	NA	ND		67	ug/kg	N/A	ND		260	ug/kg	ND		61	ug/kg
Di-n-butylphthalate	8,100	NA	NA	ND		67	ug/kg	N/A	ND		260	ug/kg	ND		61	ug/kg
Di-n-Octylphthalate	50,000	NA	NA	ND		67	ug/kg	N/A	ND		260	ug/kg	ND		61	ug/kg
Diphenylamine	NA	NA	NA	ND		67	ug/kg	N/A	ND		260	ug/kg	ND		61	ug/kg
Fluoranthene	100,000	500,000	1,000,000	ND		67	ug/kg	N/A	ND		260	ug/kg	ND		61	ug/kg
Fluorene	30,000	500,000	386,000	ND		67	ug/kg	N/A	ND		260	ug/kg	ND		61	ug/kg
Hexachlorobenzene	330	6,000	3,200	ND		67	ug/kg	N/A	ND		260	ug/kg	ND		61	ug/kg
Hexachlorobutadiene	NA	NA	NA	ND		67	ug/kg	N/A	ND		260	ug/kg	ND		61	ug/kg
Hexachlorocyclopentadiene	NA	NA	NA	ND		67	ug/kg	N/A	ND		260	ug/kg	ND		61	ug/kg
Hexachloroethane	NA	NA	NA	ND		67	ug/kg	N/A	ND		260	ug/kg	ND		61	ug/kg
Indeno(1,2,3-cd)pyrene	500	5,600	8,200	ND		67	ug/kg	N/A	1,200		260	ug/kg	ND		61	ug/kg
Isophorone	4,400	NA	NA	ND		67	ug/kg	N/A	ND		260	ug/kg	ND		61	ug/kg
Naphthalene	12,000	500,000	12,000	ND		67	ug/kg	N/A	ND		260	ug/kg	ND		61	ug/kg
Nitrobenzene	200	NA	NA	ND		67	ug/kg	N/A	ND		260	ug/kg	ND		61	ug/kg
n-Nitroso-di-n-propylamine	NA	NA	NA	ND		67	ug/kg	N/A	ND		260	ug/kg	ND		61	ug/kg
Pentachlorophenol	800	6,700	800	ND		67	ug/kg	N/A	ND		260	ug/kg	ND		61	ug/kg
Phenanthrene	100,000	500,000	1,000,000	ND		67	ug/kg	N/A	ND		260	ug/kg	ND		61	ug/kg
Phenol	330	500,000	330	ND		67	ug/kg	N/A	ND		260	ug/kg	ND		61	ug/kg
Pyrene	100,000	500,000	1,000,000	ND		67	ug/kg	N/A	380		260	ug/kg	ND		61	ug/kg
TPH	NA	NA	NA	ND		110,000	ug/kg	N/A	140,000		97,000	ug/kg	ND		98,000	ug/kg
Pesticides																
4,4'-DDD	3.3	92,000	14,000	N/A				N/A	N/A				N/A			
4,4'-DDE	3.3	62,000	17,000	N/A				N/A	N/A				N/A			
4,4'-DDT	3.3	47,000	136,000	N/A				N/A	N/A				N/A			
Aldrin	5	680	190	N/A				N/A	N/A				N/A			
alpha-BHC	20	3,400	20	N/A				N/A	N/A				N/A			
alpha-Chlordane	94	24,000	2,900	N/A				N/A	N/A				N/A			
beta-BHC	36	3,000	90	N/A				N/A	N/A				N/A			
delta-BHC	40	500,000	250	N/A				N/A	N/A				N/A			
Dieldrin	5	1,400	100	N/A				N/A	N/A				N/A			
Endosulfan I	2,400	200,000	102,000	N/A				N/A	N/A				N/A			
Endosulfan II	2,400	200,000	102,000	N/A				N/A	N/A				N/A			
Endosulfan sulfate	2,400	200,000	1,000,000	N/A				N/A	N/A				N/A			
Endrin	14	89,000	60	N/A				N/A	N/A				N/A			
Endrin aldehyde	NA	NA	NA	N/A				N/A	N/A				N/A			
Endrin ketone	NA	NA	NA	N/A				N/A	N/A				N/A			
gamma-BHC	100	NA	NA	N/A				N/A	N/A				N/A			
gamma-Chlordane	94	NA	NA	N/A				N/A	N/A				N/A			
Heptachlor	42	15,000	380	N/A				N/A	N/A				N/A			
Heptachlor epoxide	20	NA	NA	N/A				N/A	N/A				N/A			
Methoxychlor	10,000	NA	NA	N/A				N/A	N/A				N/A			

Shaded values indicate a Track 1 SCO exceedance
NA - Not Applicable
N/A - Not Analyzed
ND - Not Detected
SB - Soil Background
RL - Laboratory Reporting Limit

TABLE 2 - EXCEEDANCES OF SOIL/FILL SCOs
CONCORD HOTEL AND RESORT
TOWN OF THOMPSON, NEW YORK
NYSDEC BCP No. C353008
SESI CONSULTING ENGINEERS PROJECT # 7180

TestName	Unrestricted Track 1 SCO (ug/kg)	Protection of Public Health Commercial (ug/kg)	Protection of Groundwater (ug/kg)	OU-1A-12B Z0823309 8/20/08				OU-1A-13A Z0823306 8/20/08	OU-1A-13Ax4 Z0823306 8/20/08				OU-1A-13B Z0823307 8/20/08			
				Result	Flg	RL	Units		Result	Flg	RL	Units	Result	Flg	RL	Units
PCB's																
Aroclor 1221-1	100	1,000	3,200	N/A				N/A	N/A				N/A			
Aroclor 1221-2	100	1,000	3,200	N/A				N/A	N/A				N/A			
Aroclor 1221-3	100	1,000	3,200	N/A				N/A	N/A				N/A			
Aroclor 1232-1	100	1,000	3,200	N/A				N/A	N/A				N/A			
Aroclor 1232-2	100	1,000	3,200	N/A				N/A	N/A				N/A			
Aroclor 1232-3	100	1,000	3,200	N/A				N/A	N/A				N/A			
Aroclor 1242-1	100	1,000	3,200	N/A				N/A	N/A				N/A			
Aroclor 1242-2	100	1,000	3,200	N/A				N/A	N/A				N/A			
Aroclor 1242-3	100	1,000	3,200	N/A				N/A	N/A				N/A			
Aroclor 1248-1	100	1,000	3,200	N/A				N/A	N/A				N/A			
Aroclor 1248-2	100	1,000	3,200	N/A				N/A	N/A				N/A			
Aroclor 1248-3	100	1,000	3,200	N/A				N/A	N/A				N/A			
Aroclor 1254-1	100	1,000	3,200	N/A				N/A	N/A				N/A			
Aroclor 1254-2	100	1,000	3,200	N/A				N/A	N/A				N/A			
Aroclor 1254-3	100	1,000	3,200	N/A				N/A	N/A				N/A			
Aroclor 1016-1	100	1,000	3,200	N/A				N/A	N/A				N/A			
Aroclor 1016-2	100	1,000	3,200	N/A				N/A	N/A				N/A			
Aroclor 1016-3	100	1,000	3,200	N/A				N/A	N/A				N/A			
Aroclor 1260-1	100	1,000	3,200	N/A				N/A	N/A				N/A			
Aroclor 1260-2	100	1,000	3,200	N/A				N/A	N/A				N/A			
Aroclor 1260-3	100	1,000	3,200	N/A				N/A	N/A				N/A			
Metals	(mg/kg)	(mg/kg)	(mg/kg)													
Mercury	0.18	2.8	0.18	N/A				N/A	N/A				N/A			
Aluminum	SB	NA	NA	N/A				N/A	N/A				N/A			
Antimony	SB	NA	NA	N/A				N/A	N/A				N/A			
Arsenic	13	16	16	N/A				N/A	N/A				N/A			
Barium	350	400	820	N/A				N/A	N/A				N/A			
Beryllium	7.2	590	47	N/A				N/A	N/A				N/A			
Cadmium	2.5	9.3	7.5	N/A				N/A	N/A				N/A			
Calcium	SB	NA	NA	N/A				N/A	N/A				N/A			
Chromium	30	1,500	NA	N/A				N/A	N/A				N/A			
Cobalt	30 or SB	NA	NA	N/A				N/A	N/A				N/A			
Copper	50	270	1,720	N/A				N/A	N/A				N/A			
Iron	2,000 or SB	NA	NA	N/A				N/A	N/A				N/A			
Lead	63	1,000	450	N/A				N/A	N/A				N/A			
Magnesium	SB	NA	NA	N/A				N/A	N/A				N/A			
Manganese	1,600	10,000	2,000	N/A				N/A	N/A				N/A			
Nickel	30	310	130	N/A				N/A	N/A				N/A			
Potassium	SB	NA	NA	N/A				N/A	N/A				N/A			
Selenium	3.9	1,500	4	N/A				N/A	N/A				N/A			
Silver	2	1,500	8.3	N/A				N/A	N/A				N/A			
Sodium	SB	NA	NA	N/A				N/A	N/A				N/A			
Thallium	SB	NA	NA	N/A				N/A	N/A				N/A			
Vanadium	150 or SB	NA	NA	N/A				N/A	N/A				N/A			
Zinc	109	10,000	2,480	N/A				N/A	N/A				N/A			
Other Parameters																
Cyanide	27	27	40	N/A				N/A	N/A				N/A			

Shaded values indicate a Track 1 SCO exceedance
NA - Not Applicable
N/A - Not Analyzed
ND - Not Detected
SB - Soil Background
RL - Laboratory Reporting Limit

TABLE 2 - EXCEEDANCES OF SOIL/FILL SCOs
CONCORD HOTEL AND RESORT
TOWN OF THOMPSON, NEW YORK
NYSDEC BCP No. C353008
SESI CONSULTING ENGINEERS PROJECT # 7180

TestName	Unrestricted Track 1 SCO (ug/kg)	Protection of Public Health Commercial (ug/kg)	Protection of Groundwater (ug/kg)	OU-1A-14A Z0823220 8/19/08				OU-1A-14B Z0823221 8/19/08				OU-1A-15A Z0823301 8/20/08				OU-1A-15B Z0823302 8/20/08			
				Result	Flg	RL	Units	Result	Flg	RL	Units	Result	Flg	RL	Units	Result	Flg	RL	Units
Volatile Organics																			
1,1,1-Trichloroethane	680	500,000	680	ND		1.3	ug/kg	ND		1.3	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg
1,1,2,2-Tetrachloroethane	600	NA	NA	ND		1.3	ug/kg	ND		1.3	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg
1,1,2-Trichloroethane	NA	NA	NA	ND		1.3	ug/kg	ND		1.3	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg
1,1,2-Trichlorotrifluoroethane	6,000	NA	NA	ND		1.3	ug/kg	ND		1.3	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg
1,1-Dichloroethane	270	240,000	270	ND		1.3	ug/kg	ND		1.3	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg
1,1-Dichloroethene	330	500,000	330	ND		1.3	ug/kg	ND		1.3	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg
1,2-Dibromo-3-chloropropane	NA	NA	NA	ND		1.3	ug/kg	ND		1.3	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg
1,2-Dibromoethane	NA	NA	NA	ND		1.3	ug/kg	ND		1.3	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg
1,2-Dichlorobenzene	1,100	500,000	1,100	ND		1.3	ug/kg	ND		1.3	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg
1,2-Dichloroethane	20	30,000	20	ND		1.3	ug/kg	ND		1.3	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg
1,2-Dichloropropane	NA	NA	NA	ND		1.3	ug/kg	ND		1.3	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg
1,3-Dichlorobenzene	2,400	280,000	2,400	ND		1.3	ug/kg	ND		1.3	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg
1,4-Dichlorobenzene	1,800	130,000	1,800	ND		1.3	ug/kg	ND		1.3	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg
2-Butanone	120	NA	NA	ND		6.5	ug/kg	ND		6.6	ug/kg	ND		6	ug/kg	ND		6.2	ug/kg
2-Hexanone	NA	NA	NA	ND		6.5	ug/kg	ND		6.6	ug/kg	ND		6	ug/kg	ND		6.2	ug/kg
4-Methyl-2-pentanone	1,000	NA	NA	ND		6.5	ug/kg	ND		6.6	ug/kg	ND		6	ug/kg	ND		6.2	ug/kg
Acetone	50	500,000	50	ND		32	ug/kg	ND		33	ug/kg	ND		30	ug/kg	ND		31	ug/kg
Benzene	60	44,000	60	ND		1.3	ug/kg	ND		1.3	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg
Bromodichloromethane	NA	NA	NA	ND		1.3	ug/kg	ND		1.3	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg
Bromoform	NA	NA	NA	ND		1.3	ug/kg	ND		1.3	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg
Bromomethane	NA	NA	NA	ND		1.3	ug/kg	ND		1.3	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg
Carbon Disulfide	2,700	NA	NA	ND		1.3	ug/kg	ND		1.3	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg
Carbon Tetrachloride	760	22,000	760	ND		1.3	ug/kg	ND		1.3	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg
Chlorobenzene	1,100	500,000	1,100	ND		1.3	ug/kg	ND		1.3	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg
Chloroethane	1,900	NA	NA	ND		1.3	ug/kg	ND		1.3	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg
Chloroform	370	350,000	370	ND		1.3	ug/kg	ND		1.3	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg
Chloromethane	NA	NA	NA	ND		1.3	ug/kg	ND		1.3	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg
cis-1,2-Dichloroethene	250	NA	NA	ND		1.3	ug/kg	ND		1.3	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg
cis-1,3-Dichloropropene	NA	NA	NA	ND		1.3	ug/kg	ND		1.3	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg
Cyclohexane	NA	NA	NA	ND		1.3	ug/kg	ND		1.3	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg
Dibromochloromethane	NA	NA	NA	ND		1.3	ug/kg	ND		1.3	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg
Dichlorodifluoromethane	NA	NA	NA	ND		13	ug/kg	ND		13	ug/kg	ND		12	ug/kg	ND		12	ug/kg
Ethylbenzene	1,000	390,000	1,000	ND		1.3	ug/kg	ND		1.3	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg
Isopropylbenzene	NA	NA	NA	ND		1.3	ug/kg	ND		1.3	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg
m&p-Xylenes	260	NA	NA	ND		2.6	ug/kg	ND		2.6	ug/kg	ND		2.4	ug/kg	ND		2.5	ug/kg
Methylcyclohexane	NA	NA	NA	ND		1.3	ug/kg	ND		1.3	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg
Methylene Chloride	50	500,000	50	ND		1.3	ug/kg	ND		1.3	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg
Methyl-tert-butyl Ether	930	NA	NA	ND		1.3	ug/kg	ND		1.3	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg
o-Xylene	260	NA	NA	ND		1.3	ug/kg	ND		1.3	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg
Styrene	NA	NA	NA	ND		1.3	ug/kg	ND		1.3	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg
tert-Butyl Alcohol	NA	NA	NA	ND		6.5	ug/kg	ND		6.6	ug/kg	ND		6	ug/kg	ND		6.2	ug/kg
Tetrachloroethene	1,300	150,000	1,300	ND		1.3	ug/kg	ND		1.3	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg
Toluene	700	500,000	700	ND		1.3	ug/kg	ND		1.3	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg
trans-1,2-Dichloroethene	190	NA	NA	ND		1.3	ug/kg	ND		1.3	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg
trans-1,3-Dichloropropene	NA	NA	NA	ND		1.3	ug/kg	ND		1.3	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg
Trichloroethene	470	200,000	470	ND		1.3	ug/kg	ND		1.3	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg
Trichlorofluoromethane	NA	NA	NA	ND		1.3	ug/kg	ND		1.3	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg
Vinyl Chloride	20	13,000	20	ND		1.3	ug/kg	ND		1.3	ug/kg	ND		1.2	ug/kg	ND		1.2	ug/kg

Shaded values indicate a Track 1 SCO exceedance
NA - Not Applicable
N/A - Not Analyzed
ND - Not Detected
SB - Soil Background
RL - Laboratory Reporting Limit

TABLE 2 - EXCEEDANCES OF SOIL/FILL SCOs
CONCORD HOTEL AND RESORT
TOWN OF THOMPSON, NEW YORK
NYSDEC BCP No. C353008
SESI CONSULTING ENGINEERS PROJECT # 7180

TestName	Unrestricted Track 1 SCO (ug/kg)	Protection of Public Health Commercial (ug/kg)	Protection of Groundwater (ug/kg)	OU-1A-14A Z0823220 8/19/08				OU-1A-14B Z0823221 8/19/08				OU-1A-15A Z0823301 8/20/08				OU-1A-15B Z0823302 8/20/08			
				Result	Flg	RL	Units	Result	Flg	RL	Units	Result	Flg	RL	Units	Result	Flg	RL	Units
Semi Volatile Organics																			
(3 & 4)-Methylphenol	330	NA	NA	ND		62	ug/kg	ND		53	ug/kg	ND		69	ug/kg	N/A			
1,2,4-Trichlorobenzene	3,400	NA	NA	ND		62	ug/kg	ND		53	ug/kg	ND		69	ug/kg	N/A			
2,4,5-Trichlorophenol	100	NA	NA	ND		62	ug/kg	ND		53	ug/kg	ND		69	ug/kg	N/A			
2,4,6-Trichlorophenol	NA	NA	NA	ND		62	ug/kg	ND		53	ug/kg	ND		69	ug/kg	N/A			
2,4-Dichlorophenol	400	NA	NA	ND		62	ug/kg	ND		53	ug/kg	ND		69	ug/kg	N/A			
2,4-Dimethylphenol	NA	NA	NA	ND		62	ug/kg	ND		53	ug/kg	ND		69	ug/kg	N/A			
2,4-Dinitrophenol	200	NA	NA	ND		1,200	ug/kg	ND		1,100	ug/kg	ND		1,400	ug/kg	N/A			
2,4-Dinitrotoluene	NA	NA	NA	ND		62	ug/kg	ND		53	ug/kg	ND		69	ug/kg	N/A			
2,6-Dinitrotoluene	1,000	NA	NA	ND		62	ug/kg	ND		53	ug/kg	ND		69	ug/kg	N/A			
2-Chloronaphthalene	NA	NA	NA	ND		62	ug/kg	ND		53	ug/kg	ND		69	ug/kg	N/A			
2-Chlorophenol	800	NA	NA	ND		62	ug/kg	ND		53	ug/kg	ND		69	ug/kg	N/A			
2-Methyl-4,6-dinitrophenol	NA	NA	NA	ND		1,200	ug/kg	ND		1,100	ug/kg	ND		1,400	ug/kg	N/A			
2-Methylnaphthalene	36,400	NA	NA	ND		62	ug/kg	ND		53	ug/kg	ND		69	ug/kg	N/A			
2-Methylphenol	330	NA	NA	ND		62	ug/kg	ND		53	ug/kg	ND		69	ug/kg	N/A			
2-Nitroaniline	430	NA	NA	ND		62	ug/kg	ND		53	ug/kg	ND		69	ug/kg	N/A			
2-Nitrophenol	330	NA	NA	ND		62	ug/kg	ND		53	ug/kg	ND		69	ug/kg	N/A			
3,3'-Dichlorobenzidine	NA	NA	NA	ND		62	ug/kg	ND		53	ug/kg	ND		69	ug/kg	N/A			
3-Nitroaniline	500	NA	NA	ND		62	ug/kg	ND		53	ug/kg	ND		69	ug/kg	N/A			
4-Bromophenyl-phenylether	NA	NA	NA	ND		62	ug/kg	ND		53	ug/kg	ND		69	ug/kg	N/A			
4-Chloro-3-methylphenol	240	NA	NA	ND		62	ug/kg	ND		53	ug/kg	ND		69	ug/kg	N/A			
4-Chloroaniline	220	NA	NA	ND		62	ug/kg	ND		53	ug/kg	ND		69	ug/kg	N/A			
4-Chlorophenyl-phenylether	NA	NA	NA	ND		62	ug/kg	ND		53	ug/kg	ND		69	ug/kg	N/A			
4-Nitroaniline	NA	NA	NA	ND		62	ug/kg	ND		53	ug/kg	ND		69	ug/kg	N/A			
4-Nitrophenol	100	NA	NA	ND		62	ug/kg	ND		53	ug/kg	ND		69	ug/kg	N/A			
Acenaphthene	20,000	500,000	98,000	ND		62	ug/kg	ND		53	ug/kg	ND		69	ug/kg	N/A			
Acenaphthylene	100,000	500,000	107,000	ND		62	ug/kg	ND		53	ug/kg	ND		69	ug/kg	N/A			
Aniline	100	NA	NA	ND		62	ug/kg	ND		53	ug/kg	ND		69	ug/kg	N/A			
Anthracene	100,000	500,000	1,000,000	ND		62	ug/kg	ND		53	ug/kg	ND		69	ug/kg	N/A			
Benzo(a)anthracene	1,000	5,600	1,000	ND		62	ug/kg	ND		53	ug/kg	180		69	ug/kg	N/A			
Benzo(a)pyrene	1,000	1,000	22,000	ND		62	ug/kg	ND		53	ug/kg	180		69	ug/kg	N/A			
Benzo(b)fluoranthene	1,000	5,600	1,700	ND		62	ug/kg	ND		53	ug/kg	220		69	ug/kg	N/A			
Benzo(g,h,i)perylene	100,000	500,000	1,000,000	ND		62	ug/kg	ND		53	ug/kg	70		69	ug/kg	N/A			
Benzo(k)fluoranthene	800	56,000	1,700	ND		62	ug/kg	ND		53	ug/kg	97		69	ug/kg	N/A			
bis(2-Chloroethoxy)methane	NA	NA	NA	ND		62	ug/kg	ND		53	ug/kg	ND		69	ug/kg	N/A			
bis(2-Chloroethyl)ether	NA	NA	NA	ND		62	ug/kg	ND		53	ug/kg	ND		69	ug/kg	N/A			
bis(2-Ethylhexyl)phthalate	50,000	NA	NA	ND		120	ug/kg	ND		110	ug/kg	ND		140	ug/kg	N/A			
Butylbenzylphthalate	50,000	NA	NA	ND		62	ug/kg	ND		53	ug/kg	ND		69	ug/kg	N/A			
Carbazole	NA	NA	NA	ND		62	ug/kg	ND		53	ug/kg	ND		69	ug/kg	N/A			
Chrysene	1,000	56,000	1,000	ND		62	ug/kg	ND		53	ug/kg	200		69	ug/kg	N/A			
Dibenz(a,h)anthracene	330	560	1,000,000	ND		62	ug/kg	ND		53	ug/kg	ND		69	ug/kg	N/A			

Shaded values indicate a Track 1 SCO exceedance
NA - Not Applicable
N/A - Not Analyzed
ND - Not Detected
SB - Soil Background
RL - Laboratory Reporting Limit

TABLE 2 - EXCEEDANCES OF SOIL/FILL SCOs
CONCORD HOTEL AND RESORT
TOWN OF THOMPSON, NEW YORK
NYSDEC BCP No. C353008
SESI CONSULTING ENGINEERS PROJECT # 7180

TestName	Unrestricted Track 1 SCO (ug/kg)	Protection of Public Health Commercial (ug/kg)	Protection of Groundwater (ug/kg)	OU-1A-14A Z0823220 8/19/08				OU-1A-14B Z0823221 8/19/08				OU-1A-15A Z0823301 8/20/08				OU-1A-15B Z0823302 8/20/08			
				Result	Flg	RL	Units	Result	Flg	RL	Units	Result	Flg	RL	Units	Result	Flg	RL	Units
Dibenzofuran	7,000	NA	NA	ND		62	ug/kg	ND		53	ug/kg	ND		69	ug/kg	N/A			
Diethylphthalate	7,100	NA	NA	ND		62	ug/kg	ND		53	ug/kg	ND		69	ug/kg	N/A			
Dimethylphthalate	2,000	NA	NA	ND		62	ug/kg	ND		53	ug/kg	ND		69	ug/kg	N/A			
Di-n-butylphthalate	8,100	NA	NA	ND		62	ug/kg	ND		53	ug/kg	ND		69	ug/kg	N/A			
Di-n-Octylphthalate	50,000	NA	NA	ND		62	ug/kg	ND		53	ug/kg	ND		69	ug/kg	N/A			
Diphenylamine	NA	NA	NA	ND		62	ug/kg	ND		53	ug/kg	ND		69	ug/kg	N/A			
Fluoranthene	100,000	500,000	1,000,000	ND		62	ug/kg	ND		53	ug/kg	400		400	ug/kg	N/A			
Fluorene	30,000	500,000	386,000	ND		62	ug/kg	ND		53	ug/kg	ND		69	ug/kg	N/A			
Hexachlorobenzene	330	6,000	3,200	ND		62	ug/kg	ND		53	ug/kg	ND		69	ug/kg	N/A			
Hexachlorobutadiene	NA	NA	NA	ND		62	ug/kg	ND		53	ug/kg	ND		69	ug/kg	N/A			
Hexachlorocyclopentadiene	NA	NA	NA	ND		62	ug/kg	ND		53	ug/kg	ND		69	ug/kg	N/A			
Hexachloroethane	NA	NA	NA	ND		62	ug/kg	ND		53	ug/kg	ND		69	ug/kg	N/A			
Indeno(1,2,3-cd)pyrene	500	5,600	8,200	ND		62	ug/kg	ND		53	ug/kg	79		79	ug/kg	N/A			
Isophorone	4,400	NA	NA	ND		62	ug/kg	ND		53	ug/kg	ND		69	ug/kg	N/A			
Naphthalene	12,000	500,000	12,000	ND		62	ug/kg	ND		53	ug/kg	ND		69	ug/kg	N/A			
Nitrobenzene	200	NA	NA	ND		62	ug/kg	ND		53	ug/kg	ND		69	ug/kg	N/A			
n-Nitroso-di-n-propylamine	NA	NA	NA	ND		62	ug/kg	ND		53	ug/kg	ND		69	ug/kg	N/A			
Pentachlorophenol	800	6,700	800	ND		62	ug/kg	ND		53	ug/kg	ND		69	ug/kg	N/A			
Phenanthrene	100,000	500,000	1,000,000	ND		62	ug/kg	ND		53	ug/kg	150		150	ug/kg	N/A			
Phenol	330	500,000	330	ND		62	ug/kg	ND		53	ug/kg	ND		69	ug/kg	N/A			
Pyrene	100,000	500,000	1,000,000	ND		62	ug/kg	ND		53	ug/kg	360		360	ug/kg	N/A			
TPH	NA	NA	NA	ND		99,000	ug/kg	ND		84,000	ug/kg	ND		110,000	ug/kg	N/A			
Pesticides																			
4,4'-DDD	3.3	92,000	14,000	N/A				N/A				N/A				N/A			
4,4'-DDE	3.3	62,000	17,000	N/A				N/A				N/A				N/A			
4,4'-DDT	3.3	47,000	136,000	N/A				N/A				N/A				N/A			
Aldrin	5	680	190	N/A				N/A				N/A				N/A			
alpha-BHC	20	3,400	20	N/A				N/A				N/A				N/A			
alpha-Chlordane	94	24,000	2,900	N/A				N/A				N/A				N/A			
beta-BHC	36	3,000	90	N/A				N/A				N/A				N/A			
delta-BHC	40	500,000	250	N/A				N/A				N/A				N/A			
Dieldrin	5	1,400	100	N/A				N/A				N/A				N/A			
Endosulfan I	2,400	200,000	102,000	N/A				N/A				N/A				N/A			
Endosulfan II	2,400	200,000	102,000	N/A				N/A				N/A				N/A			
Endosulfan sulfate	2,400	200,000	1,000,000	N/A				N/A				N/A				N/A			
Endrin	14	89,000	60	N/A				N/A				N/A				N/A			
Endrin aldehyde	NA	NA	NA	N/A				N/A				N/A				N/A			
Endrin ketone	NA	NA	NA	N/A				N/A				N/A				N/A			
gamma-BHC	100	NA	NA	N/A				N/A				N/A				N/A			
gamma-Chlordane	94	NA	NA	N/A				N/A				N/A				N/A			
Heptachlor	42	15,000	380	N/A				N/A				N/A				N/A			
Heptachlor epoxide	20	NA	NA	N/A				N/A				N/A				N/A			
Methoxychlor	10,000	NA	NA	N/A				N/A				N/A				N/A			

Shaded values indicate a Track 1 SCO exceedance
NA - Not Applicable
N/A - Not Analyzed
ND - Not Detected
SB - Soil Background
RL - Laboratory Reporting Limit

TABLE 2 - EXCEEDANCES OF SOIL/FILL SCOs
CONCORD HOTEL AND RESORT
TOWN OF THOMPSON, NEW YORK
NYSDEC BCP No. C353008
SESI CONSULTING ENGINEERS PROJECT # 7180

TestName	Unrestricted Track 1 SCO (ug/kg)	Protection of Public Health Commercial (ug/kg)	Protection of Groundwater (ug/kg)	OU-1A-14A Z0823220 8/19/08				OU-1A-14B Z0823221 8/19/08				OU-1A-15A Z0823301 8/20/08				OU-1A-15B Z0823302 8/20/08			
				Result	Flg	RL	Units	Result	Flg	RL	Units	Result	Flg	RL	Units	Result	Flg	RL	Units
PCB's																			
Aroclor 1221-1	100	1,000	3,200	N/A				N/A				N/A				N/A			
Aroclor 1221-2	100	1,000	3,200	N/A				N/A				N/A				N/A			
Aroclor 1221-3	100	1,000	3,200	N/A				N/A				N/A				N/A			
Aroclor 1232-1	100	1,000	3,200	N/A				N/A				N/A				N/A			
Aroclor 1232-2	100	1,000	3,200	N/A				N/A				N/A				N/A			
Aroclor 1232-3	100	1,000	3,200	N/A				N/A				N/A				N/A			
Aroclor 1242-1	100	1,000	3,200	N/A				N/A				N/A				N/A			
Aroclor 1242-2	100	1,000	3,200	N/A				N/A				N/A				N/A			
Aroclor 1242-3	100	1,000	3,200	N/A				N/A				N/A				N/A			
Aroclor 1248-1	100	1,000	3,200	N/A				N/A				N/A				N/A			
Aroclor 1248-2	100	1,000	3,200	N/A				N/A				N/A				N/A			
Aroclor 1248-3	100	1,000	3,200	N/A				N/A				N/A				N/A			
Aroclor 1254-1	100	1,000	3,200	N/A				N/A				N/A				N/A			
Aroclor 1254-2	100	1,000	3,200	N/A				N/A				N/A				N/A			
Aroclor 1254-3	100	1,000	3,200	N/A				N/A				N/A				N/A			
Aroclor 1016-1	100	1,000	3,200	N/A				N/A				N/A				N/A			
Aroclor 1016-2	100	1,000	3,200	N/A				N/A				N/A				N/A			
Aroclor 1016-3	100	1,000	3,200	N/A				N/A				N/A				N/A			
Aroclor 1260-1	100	1,000	3,200	N/A				N/A				N/A				N/A			
Aroclor 1260-2	100	1,000	3,200	N/A				N/A				N/A				N/A			
Aroclor 1260-3	100	1,000	3,200	N/A				N/A				N/A				N/A			
Metals	**(mg/kg)**	**(mg/kg)**	**(mg/kg)**																
Mercury	0.18	2.8	0.18	N/A				N/A				N/A				N/A			
Aluminum	SB	NA	NA	N/A				N/A				N/A				N/A			
Antimony	SB	NA	NA	N/A				N/A				N/A				N/A			
Arsenic	13	16	16	N/A				N/A				N/A				N/A			
Barium	350	400	820	N/A				N/A				N/A				N/A			
Beryllium	7.2	590	47	N/A				N/A				N/A				N/A			
Cadmium	2.5	9.3	7.5	N/A				N/A				N/A				N/A			
Calcium	SB	NA	NA	N/A				N/A				N/A				N/A			
Chromium	30	1,500	NA	N/A				N/A				N/A				N/A			
Cobalt	30 or SB	NA	NA	N/A				N/A				N/A				N/A			
Copper	50	270	1,720	N/A				N/A				N/A				N/A			
Iron	2,000 or SB	NA	NA	N/A				N/A				N/A				N/A			
Lead	63	1,000	450	N/A				N/A				N/A				N/A			
Magnesium	SB	NA	NA	N/A				N/A				N/A				N/A			
Manganese	1,600	10,000	2,000	N/A				N/A				N/A				N/A			
Nickel	30	310	130	N/A				N/A				N/A				N/A			
Potassium	SB	NA	NA	N/A				N/A				N/A				N/A			
Selenium	3.9	1,500	4	N/A				N/A				N/A				N/A			
Silver	2	1,500	8.3	N/A				N/A				N/A				N/A			
Sodium	SB	NA	NA	N/A				N/A				N/A				N/A			
Thallium	SB	NA	NA	N/A				N/A				N/A				N/A			
Vanadium	150 or SB	NA	NA	N/A				N/A				N/A				N/A			
Zinc	109	10,000	2,480	N/A				N/A				N/A				N/A			
Other Parameters																			
Cyanide	27	27	40	N/A				N/A				N/A				N/A			

Shaded values indicate a Track 1 SCO exceedance
NA - Not Applicable
N/A - Not Analyzed
ND - Not Detected
SB - Soil Background
RL - Laboratory Reporting Limit

TABLE 2 - EXCEEDANCES OF SOIL/FILL SCOs
CONCORD HOTEL AND RESORT
TOWN OF THOMPSON, NEW YORK
NYSDEC BCP No. C353008
SESI CONSULTING ENGINEERS PROJECT # 7180

TestName	Unrestricted Track 1 SCO (ug/kg)	Protection of Public Health Commercial (ug/kg)	Protection of Groundwater (ug/kg)	OU-1A-15Bx10 Z0823302 8/20/08				OU-1A-15C Z0823303 8/20/08				OU-1A-15C x20 Z0823303 8/20/08				OU-1A-15D Z0823304 8/20/08			
				Result	Flg	RL	Units	Result	Flg	RL	Units	Result	Flg	RL	Units	Result	Flg	RL	Units
Volatile Organics																			
1,1,1-Trichloroethane	680	500,000	680	N/A				ND		1.2	ug/kg	N/A				ND		1.2	ug/kg
1,1,2,2-Tetrachloroethane	600	NA	NA	N/A				ND		1.2	ug/kg	N/A				ND		1.2	ug/kg
1,1,2-Trichloroethane	NA	NA	NA	N/A				ND		1.2	ug/kg	N/A				ND		1.2	ug/kg
1,1,2-Trichlorotrifluoroethane	6,000	NA	NA	N/A				ND		1.2	ug/kg	N/A				ND		1.2	ug/kg
1,1-Dichloroethane	270	240,000	270	N/A				ND		1.2	ug/kg	N/A				ND		1.2	ug/kg
1,1-Dichloroethene	330	500,000	330	N/A				ND		1.2	ug/kg	N/A				ND		1.2	ug/kg
1,2-Dibromo-3-chloropropane	NA	NA	NA	N/A				ND		1.2	ug/kg	N/A				ND		1.2	ug/kg
1,2-Dibromoethane	NA	NA	NA	N/A				ND		1.2	ug/kg	N/A				11		1.2	ug/kg
1,2-Dichlorobenzene	1,100	500,000	1,100	N/A				ND		1.2	ug/kg	N/A				ND		1.2	ug/kg
1,2-Dichloroethane	20	30,000	20	N/A				ND		1.2	ug/kg	N/A				ND		1.2	ug/kg
1,2-Dichloropropane	NA	NA	NA	N/A				ND		1.2	ug/kg	N/A				ND		1.2	ug/kg
1,3-Dichlorobenzene	2,400	280,000	2,400	N/A				ND		1.2	ug/kg	N/A				ND		1.2	ug/kg
1,4-Dichlorobenzene	1,800	130,000	1,800	N/A				ND		1.2	ug/kg	N/A				ND		1.2	ug/kg
2-Butanone	120	NA	NA	N/A				ND		6.2	ug/kg	N/A				ND		6.1	ug/kg
2-Hexanone	NA	NA	NA	N/A				ND		6.2	ug/kg	N/A				ND		6.1	ug/kg
4-Methyl-2-pentanone	1,000	NA	NA	N/A				ND		6.2	ug/kg	N/A				ND		6.1	ug/kg
Acetone	50	500,000	50	N/A				ND		31	ug/kg	N/A				ND		30	ug/kg
Benzene	60	44,000	60	N/A				2.8		1.2	ug/kg	N/A				4.1		1.2	ug/kg
Bromodichloromethane	NA	NA	NA	N/A				ND		1.2	ug/kg	N/A				ND		1.2	ug/kg
Bromoform	NA	NA	NA	N/A				ND		1.2	ug/kg	N/A				ND		1.2	ug/kg
Bromomethane	NA	NA	NA	N/A				ND		1.2	ug/kg	N/A				ND		1.2	ug/kg
Carbon Disulfide	2,700	NA	NA	N/A				ND		1.2	ug/kg	N/A				2.1		1.2	ug/kg
Carbon Tetrachloride	760	22,000	760	N/A				ND		1.2	ug/kg	N/A				ND		1.2	ug/kg
Chlorobenzene	1,100	500,000	1,100	N/A				ND		1.2	ug/kg	N/A				ND		1.2	ug/kg
Chloroethane	1,900	NA	NA	N/A				ND		1.2	ug/kg	N/A				ND		1.2	ug/kg
Chloroform	370	350,000	370	N/A				ND		1.2	ug/kg	N/A				ND		1.2	ug/kg
Chloromethane	NA	NA	NA	N/A				ND		1.2	ug/kg	N/A				ND		1.2	ug/kg
cis-1,2-Dichloroethene	250	NA	NA	N/A				ND		1.2	ug/kg	N/A				ND		1.2	ug/kg
cis-1,3-Dichloropropene	NA	NA	NA	N/A				ND		1.2	ug/kg	N/A				ND		1.2	ug/kg
Cyclohexane	NA	NA	NA	N/A				10		1.2	ug/kg	N/A				5.1		1.2	ug/kg
Dibromochloromethane	NA	NA	NA	N/A				ND		1.2	ug/kg	N/A				ND		1.2	ug/kg
Dichlorodifluoromethane	NA	NA	NA	N/A				ND		12	ug/kg	N/A				ND		12	ug/kg
Ethylbenzene	1,000	390,000	1,000	N/A				43		1.2	ug/kg	N/A				51		1.2	ug/kg
Isopropylbenzene	NA	NA	NA	N/A				87		1.2	ug/kg	N/A				520		1.2	ug/kg
m&p-Xylenes	260	NA	NA	N/A				44		1.2	ug/kg	N/A				ND		2.4	ug/kg
Methylcyclohexane	NA	NA	NA	N/A				ND		1.2	ug/kg	N/A				ND		1.2	ug/kg
Methylene Chloride	50	500,000	50	N/A				ND		1.2	ug/kg	N/A				ND		1.2	ug/kg
Methyl-tert-butyl Ether	930	NA	NA	N/A				ND		1.2	ug/kg	N/A				ND		1.2	ug/kg
o-Xylene	260	NA	NA	N/A				120		1.2	ug/kg	N/A				ND		1.2	ug/kg
Styrene	NA	NA	NA	N/A				ND		1.2	ug/kg	N/A				ND		1.2	ug/kg
tert-Butyl Alcohol	NA	NA	NA	N/A				ND		6.2	ug/kg	N/A				ND		6.1	ug/kg
Tetrachloroethene	1,300	150,000	1,300	N/A				ND		1.2	ug/kg	N/A				ND		1.2	ug/kg
Toluene	700	500,000	700	N/A				2.5		1.2	ug/kg	N/A				2.6		1.2	ug/kg
trans-1,2-Dichloroethene	190	NA	NA	N/A				ND		1.2	ug/kg	N/A				ND		1.2	ug/kg
trans-1,3-Dichloropropene	NA	NA	NA	N/A				ND		1.2	ug/kg	N/A				ND		1.2	ug/kg
Trichloroethene	470	200,000	470	N/A				ND		1.2	ug/kg	N/A				ND		1.2	ug/kg
Trichlorofluoromethane	NA	NA	NA	N/A				ND		1.2	ug/kg	N/A				ND		1.2	ug/kg
Vinyl Chloride	20	13,000	20	N/A				ND		1.2	ug/kg	N/A				ND		1.2	ug/kg

Shaded values indicate a Track 1 SCO exceedance
NA - Not Applicable
N/A - Not Analyzed
ND - Not Detected
SB - Soil Background
RL - Laboratory Reporting Limit

TABLE 2 - EXCEEDANCES OF SOIL/FILL SCOs
CONCORD HOTEL AND RESORT
TOWN OF THOMPSON, NEW YORK
NYSDEC BCP No. C353008
SESI CONSULTING ENGINEERS PROJECT # 7180

TestName	Unrestricted Track 1 SCO (ug/kg)	Protection of Public Health Commercial (ug/kg)	Protection of Groundwater (ug/kg)	OU-1A-15Bx10 Z0823302 8/20/08				OU-1A-15C Z0823303 8/20/08				OU-1A-15C x20 Z0823303 8/20/08				OU-1A-15D Z0823304 8/20/08			
				Result	Flg	RL	Units	Result	Flg	RL	Units	Result	Flg	RL	Units	Result	Flg	RL	Units
Semi Volatile Organics																			
(3 & 4)-Methylphenol	330	NA	NA	ND		690	ug/kg	N/A				ND		1,300	ug/kg	N/A			
1,2,4-Trichlorobenzene	3,400	NA	NA	ND		690	ug/kg	N/A				ND		1,300	ug/kg	N/A			
2,4,5-Trichlorophenol	100	NA	NA	ND		690	ug/kg	N/A				ND		1,300	ug/kg	N/A			
2,4,6-Trichlorophenol	NA	NA	NA	ND		690	ug/kg	N/A				ND		1,300	ug/kg	N/A			
2,4-Dichlorophenol	400	NA	NA	ND		690	ug/kg	N/A				ND		1,300	ug/kg	N/A			
2,4-Dimethylphenol	NA	NA	NA	ND		690	ug/kg	N/A				ND		1,300	ug/kg	N/A			
2,4-Dinitrophenol	200	NA	NA	ND		14,000	ug/kg	N/A				ND		25,000	ug/kg	N/A			
2,4-Dinitrotoluene	NA	NA	NA	ND		690	ug/kg	N/A				ND		1,300	ug/kg	N/A			
2,6-Dinitrotoluene	1,000	NA	NA	ND		690	ug/kg	N/A				ND		1,300	ug/kg	N/A			
2-Chloronaphthalene	NA	NA	NA	ND		690	ug/kg	N/A				ND		1,300	ug/kg	N/A			
2-Chlorophenol	800	NA	NA	ND		690	ug/kg	N/A				ND		1,300	ug/kg	N/A			
2-Methyl-4,6-dinitrophenol	NA	NA	NA	ND		14,000	ug/kg	N/A				ND		25,000	ug/kg	N/A			
2-Methylnaphthalene	36,400	NA	NA	ND		690	ug/kg	N/A				ND		1,300	ug/kg	N/A			
2-Methylphenol	330	NA	NA	ND		690	ug/kg	N/A				ND		1,300	ug/kg	N/A			
2-Nitroaniline	430	NA	NA	ND		690	ug/kg	N/A				ND		1,300	ug/kg	N/A			
2-Nitrophenol	330	NA	NA	ND		690	ug/kg	N/A				ND		1,300	ug/kg	N/A			
3,3'-Dichlorobenzidine	NA	NA	NA	ND		690	ug/kg	N/A				ND		1,300	ug/kg	N/A			
3-Nitroaniline	500	NA	NA	ND		690	ug/kg	N/A				ND		1,300	ug/kg	N/A			
4-Bromophenyl-phenylether	NA	NA	NA	ND		690	ug/kg	N/A				ND		1,300	ug/kg	N/A			
4-Chloro-3-methylphenol	240	NA	NA	ND		690	ug/kg	N/A				ND		1,300	ug/kg	N/A			
4-Chloroaniline	220	NA	NA	ND		690	ug/kg	N/A				ND		1,300	ug/kg	N/A			
4-Chlorophenyl-phenylether	NA	NA	NA	ND		690	ug/kg	N/A				ND		1,300	ug/kg	N/A			
4-Nitroaniline	NA	NA	NA	ND		690	ug/kg	N/A				ND		1,300	ug/kg	N/A			
4-Nitrophenol	100	NA	NA	ND		690	ug/kg	N/A				ND		1,300	ug/kg	N/A			
Acenaphthene	20,000	500,000	98,000	3,900		690	ug/kg	N/A				1,900		1,300	ug/kg	N/A			
Acenaphthylene	100,000	500,000	107,000	ND		690	ug/kg	N/A				ND		1,300	ug/kg	N/A			
Aniline	100	NA	NA	ND		690	ug/kg	N/A				ND		1,300	ug/kg	N/A			
Anthracene	100,000	500,000	1,000,000	5,500		690	ug/kg	N/A				2,300		,1300	ug/kg	N/A			
Benzo(a)anthracene	1,000	5,600	1,000	15,000		690	ug/kg	N/A				3,100		1,300	ug/kg	N/A			
Benzo(a)pyrene	1,000	1,000	22,000	11,000		690	ug/kg	N/A				2,000		1,300	ug/kg	N/A			
Benzo(b)fluoranthene	1,000	5,600	1,700	16,000		690	ug/kg	N/A				ND		1,300	ug/kg	N/A			
Benzo(g,h,i)perylene	100,000	500,000	1,000,000	8,000		690	ug/kg	N/A				ND		1,300	ug/kg	N/A			
Benzo(k)fluoranthene	800	56,000	1,700	4,900		690	ug/kg	N/A				ND		1,300	ug/kg	N/A			
bis(2-Chloroethoxy)methane	NA	NA	NA	ND		690	ug/kg	N/A				ND		1,300	ug/kg	N/A			
bis(2-Chloroethyl)ether	NA	NA	NA	ND		690	ug/kg	N/A				ND		1,300	ug/kg	N/A			
bis(2-Ethylhexyl)phthalate	50,000	NA	NA	ND		1,400	ug/kg	N/A				ND		2,500	ug/kg	N/A			
Butylbenzylphthalate	50,000	NA	NA	ND		690	ug/kg	N/A				ND		1,300	ug/kg	N/A			
Carbazole	NA	NA	NA	2,600		690	ug/kg	N/A				ND		1,300	ug/kg	N/A			
Chrysene	1,000	56,000	1,000	14,000		690	ug/kg	N/A				5,700		1,300	ug/kg	N/A			
Dibenz(a,h)anthracene	330	560	1,000,000	ND		690	ug/kg	N/A				ND		1,300	ug/kg	N/A			

Shaded values indicate a Track 1 SCO exceedance
NA - Not Applicable
N/A - Not Analyzed
ND - Not Detected
SB - Soil Background
RL - Laboratory Reporting Limit

TABLE 2 - EXCEEDANCES OF SOIL/FILL SCOs
CONCORD HOTEL AND RESORT
TOWN OF THOMPSON, NEW YORK
NYSDEC BCP No. C353008
SESI CONSULTING ENGINEERS PROJECT # 7180

TestName	Unrestricted Track 1 SCO (ug/kg)	Protection of Public Health Commercial (ug/kg)	Protection of Groundwater (ug/kg)	OU-1A-15Bx10 Z0823302 8/20/08				OU-1A-15C Z0823303 8/20/08				OU-1A-15C x20 Z0823303 8/20/08				OU-1A-15D Z0823304 8/20/08			
				Result	Flg	RL	Units	Result	Flg	RL	Units	Result	Flg	RL	Units	Result	Flg	RL	Units
Dibenzofuran	7,000	NA	NA	1,200		690	ug/kg	N/A				ND		1,300	ug/kg	N/A			
Diethylphthalate	7,100	NA	NA	ND		690	ug/kg	N/A				ND		1,300	ug/kg	N/A			
Dimethylphthalate	2,000	NA	NA	ND		690	ug/kg	N/A				ND		1,300	ug/kg	N/A			
Di-n-butylphthalate	8,100	NA	NA	ND		690	ug/kg	N/A				ND		1,300	ug/kg	N/A			
Di-n-Octylphthalate	50,000	NA	NA	ND		690	ug/kg	N/A				ND		1,300	ug/kg	N/A			
Diphenylamine	NA	NA	NA	ND		690	ug/kg	N/A				2,800		1,300	ug/kg	N/A			
Fluoranthene	100,000	500,000	1,000,000	34,000		690	ug/kg	N/A				2,400		1,300	ug/kg	N/A			
Fluorene	30,000	500,000	386,000	1,500		690	ug/kg	N/A				2,700		1,300	ug/kg	N/A			
Hexachlorobenzene	330	6,000	3,200	ND		690	ug/kg	N/A				ND		1,300	ug/kg	N/A			
Hexachlorobutadiene	NA	NA	NA	ND		690	ug/kg	N/A				ND		1,300	ug/kg	N/A			
Hexachlorocyclopentadiene	NA	NA	NA	ND		690	ug/kg	N/A				ND		1,300	ug/kg	N/A			
Hexachloroethane	NA	NA	NA	ND		690	ug/kg	N/A				ND		1,300	ug/kg	N/A			
Indeno(1,2,3-cd)pyrene	500	5,600	8,200	7,000		690	ug/kg	N/A				ND		1,300	ug/kg	N/A			
Isophorone	4,400	NA	NA	ND		690	ug/kg	N/A				ND		1,300	ug/kg	N/A			
Naphthalene	12,000	500,000	12,000	ND		690	ug/kg	N/A				3,600		1,300	ug/kg	N/A			
Nitrobenzene	200	NA	NA	ND		690	ug/kg	N/A				ND		1,300	ug/kg	N/A			
n-Nitroso-di-n-propylamine	NA	NA	NA	ND		690	ug/kg	N/A				ND		1,300	ug/kg	N/A			
Pentachlorophenol	800	6,700	800	ND		690	ug/kg	N/A				ND		1,300	ug/kg	N/A			
Phenanthrene	100,000	500,000	1,000,000	24,000		690	ug/kg	N/A				14,000		1,300	ug/kg	N/A			
Phenol	330	500,000	330	ND		690	ug/kg	N/A				ND		1,300	ug/kg	N/A			
Pyrene	100,000	500,000	1,000,000	26,000		690	ug/kg	N/A				8,200		1,300	ug/kg	N/A			
TPH	NA	NA	NA	ND		1,100,000	ug/kg	N/A				5,800,000		97,000	ug/kg	N/A			
Pesticides																			
4,4'-DDD	3.3	92,000	14,000	N/A				N/A				N/A				N/A			
4,4'-DDE	3.3	62,000	17,000	N/A				N/A				N/A				N/A			
4,4'-DDT	3.3	47,000	136,000	N/A				N/A				N/A				N/A			
Aldrin	5	680	190	N/A				N/A				N/A				N/A			
alpha-BHC	20	3,400	20	N/A				N/A				N/A				N/A			
alpha-Chlordane	94	24,000	2,900	N/A				N/A				N/A				N/A			
beta-BHC	36	3,000	90	N/A				N/A				N/A				N/A			
delta-BHC	40	500,000	250	N/A				N/A				N/A				N/A			
Dieldrin	5	1,400	100	N/A				N/A				N/A				N/A			
Endosulfan I	2,400	200,000	102,000	N/A				N/A				N/A				N/A			
Endosulfan II	2,400	200,000	102,000	N/A				N/A				N/A				N/A			
Endosulfan sulfate	2,400	200,000	1,000,000	N/A				N/A				N/A				N/A			
Endrin	14	89,000	60	N/A				N/A				N/A				N/A			
Endrin aldehyde	NA	NA	NA	N/A				N/A				N/A				N/A			
Endrin ketone	NA	NA	NA	N/A				N/A				N/A				N/A			
gamma-BHC	100	NA	NA	N/A				N/A				N/A				N/A			
gamma-Chlordane	94	NA	NA	N/A				N/A				N/A				N/A			
Heptachlor	42	15,000	380	N/A				N/A				N/A				N/A			
Heptachlor epoxide	20	NA	NA	N/A				N/A				N/A				N/A			
Methoxychlor	10,000	NA	NA	N/A				N/A				N/A				N/A			

Shaded values indicate a Track 1 SCO exceedance
NA - Not Applicable
N/A - Not Analyzed
ND - Not Detected
SB - Soil Background
RL - Laboratory Reporting Limit

TABLE 2 - EXCEEDANCES OF SOIL/FILL SCOs
CONCORD HOTEL AND RESORT
TOWN OF THOMPSON, NEW YORK
NYSDEC BCP No. C353008
SESI CONSULTING ENGINEERS PROJECT # 7180

TestName	Unrestricted Track 1 SCO (ug/kg)	Protection of Public Health Commercial (ug/kg)	Protection of Groundwater (ug/kg)	OU-1A-15Bx10 Z0823302 8/20/08				OU-1A-15C Z0823303 8/20/08				OU-1A-15C x20 Z0823303 8/20/08				OU-1A-15D Z0823304 8/20/08			
				Result	Flg	RL	Units	Result	Flg	RL	Units	Result	Flg	RL	Units	Result	Flg	RL	Units
PCB's																			
Aroclor 1221-1	100	1,000	3,200	N/A				N/A				N/A				N/A			
Aroclor 1221-2	100	1,000	3,200	N/A				N/A				N/A				N/A			
Aroclor 1221-3	100	1,000	3,200	N/A				N/A				N/A				N/A			
Aroclor 1232-1	100	1,000	3,200	N/A				N/A				N/A				N/A			
Aroclor 1232-2	100	1,000	3,200	N/A				N/A				N/A				N/A			
Aroclor 1232-3	100	1,000	3,200	N/A				N/A				N/A				N/A			
Aroclor 1242-1	100	1,000	3,200	N/A				N/A				N/A				N/A			
Aroclor 1242-2	100	1,000	3,200	N/A				N/A				N/A				N/A			
Aroclor 1242-3	100	1,000	3,200	N/A				N/A				N/A				N/A			
Aroclor 1248-1	100	1,000	3,200	N/A				N/A				N/A				N/A			
Aroclor 1248-2	100	1,000	3,200	N/A				N/A				N/A				N/A			
Aroclor 1248-3	100	1,000	3,200	N/A				N/A				N/A				N/A			
Aroclor 1254-1	100	1,000	3,200	N/A				N/A				N/A				N/A			
Aroclor 1254-2	100	1,000	3,200	N/A				N/A				N/A				N/A			
Aroclor 1254-3	100	1,000	3,200	N/A				N/A				N/A				N/A			
Aroclor 1016-1	100	1,000	3,200	N/A				N/A				N/A				N/A			
Aroclor 1016-2	100	1,000	3,200	N/A				N/A				N/A				N/A			
Aroclor 1016-3	100	1,000	3,200	N/A				N/A				N/A				N/A			
Aroclor 1260-1	100	1,000	3,200	N/A				N/A				N/A				N/A			
Aroclor 1260-2	100	1,000	3,200	N/A				N/A				N/A				N/A			
Aroclor 1260-3	100	1,000	3,200	N/A				N/A				N/A				N/A			
Metals	(mg/kg)	(mg/kg)	(mg/kg)																
Mercury	0.18	2.8	0.18	N/A				N/A				N/A				N/A			
Aluminum	SB	NA	NA	N/A				N/A				N/A				N/A			
Antimony	SB	NA	NA	N/A				N/A				N/A				N/A			
Arsenic	13	16	16	N/A				N/A				N/A				N/A			
Barium	350	400	820	N/A				N/A				N/A				N/A			
Beryllium	7.2	590	47	N/A				N/A				N/A				N/A			
Cadmium	2.5	9.3	7.5	N/A				N/A				N/A				N/A			
Calcium	SB	NA	NA	N/A				N/A				N/A				N/A			
Chromium	30	1,500	NA	N/A				N/A				N/A				N/A			
Cobalt	30 or SB	NA	NA	N/A				N/A				N/A				N/A			
Copper	50	270	1,720	N/A				N/A				N/A				N/A			
Iron	2,000 or SB	NA	NA	N/A				N/A				N/A				N/A			
Lead	63	1,000	450	N/A				N/A				N/A				N/A			
Magnesium	SB	NA	NA	N/A				N/A				N/A				N/A			
Manganese	1,600	10,000	2,000	N/A				N/A				N/A				N/A			
Nickel	30	310	130	N/A				N/A				N/A				N/A			
Potassium	SB	NA	NA	N/A				N/A				N/A				N/A			
Selenium	3.9	1,500	4	N/A				N/A				N/A				N/A			
Silver	2	1,500	8.3	N/A				N/A				N/A				N/A			
Sodium	SB	NA	NA	N/A				N/A				N/A				N/A			
Thallium	SB	NA	NA	N/A				N/A				N/A				N/A			
Vanadium	150 or SB	NA	NA	N/A				N/A				N/A				N/A			
Zinc	109	10,000	2,480	N/A				N/A				N/A				N/A			
Other Parameters																			
Cyanide	27	27	40	N/A				N/A				N/A				N/A			

Shaded values indicate a Track 1 SCO exceedance
NA - Not Applicable
N/A - Not Analyzed
ND - Not Detected
SB - Soil Background
RL - Laboratory Reporting Limit

TABLE 2 - EXCEEDANCES OF SOIL/FILL SCOs
CONCORD HOTEL AND RESORT
TOWN OF THOMPSON, NEW YORK
NYSDEC BCP No. C353008
SESI CONSULTING ENGINEERS PROJECT # 7180

TestName	Unrestricted Track 1 SCO (ug/kg)	Protection of Public Health Commercial (ug/kg)	Protection of Groundwater (ug/kg)	OU-1A-15Dx20 Z0823304 8/20/08				OU-1A-15E Z0823305 8/20/08				OU-1A-18A Z0823215 8/19/08				OU-1A-T10A Y0823217 8/19/08			
				Result	Flg	RL	Units	Result	Flg	RL	Units	Result	Flg	RL	Units	Result	Flg	RL	Units
Volatile Organics																			
1,1,1-Trichloroethane	680	500,000	680	N/A				ND		1.3	ug/kg	ND		1.3	ug/kg	N/A			
1,1,2,2-Tetrachloroethane	600	NA	NA	N/A				ND		1.3	ug/kg	ND		1.3	ug/kg	N/A			
1,1,2-Trichloroethane	NA	NA	NA	N/A				ND		1.3	ug/kg	ND		1.3	ug/kg	N/A			
1,1,2-Trichlorotrifluoroethane	6,000	NA	NA	N/A				ND		1.3	ug/kg	ND		1.3	ug/kg	N/A			
1,1-Dichloroethane	270	240,000	270	N/A				ND		1.3	ug/kg	ND		1.3	ug/kg	N/A			
1,1-Dichloroethene	330	500,000	330	N/A				ND		1.3	ug/kg	ND		1.3	ug/kg	N/A			
1,2-Dibromo-3-chloropropane	NA	NA	NA	N/A				ND		1.3	ug/kg	ND		1.3	ug/kg	N/A			
1,2-Dibromoethane	NA	NA	NA	N/A				ND		1.3	ug/kg	ND		1.3	ug/kg	N/A			
1,2-Dichlorobenzene	1,100	500,000	1,100	N/A				ND		1.3	ug/kg	ND		1.3	ug/kg	N/A			
1,2-Dichloroethane	20	30,000	20	N/A				ND		1.3	ug/kg	ND		1.3	ug/kg	N/A			
1,2-Dichloropropane	NA	NA	NA	N/A				ND		1.3	ug/kg	ND		1.3	ug/kg	N/A			
1,3-Dichlorobenzene	2,400	280,000	2,400	N/A				ND		1.3	ug/kg	ND		1.3	ug/kg	N/A			
1,4-Dichlorobenzene	1,800	130,000	1,800	N/A				ND		1.3	ug/kg	ND		1.3	ug/kg	N/A			
2-Butanone	120	NA	NA	N/A				ND		6.3	ug/kg	ND		6.5	ug/kg	N/A			
2-Hexanone	NA	NA	NA	N/A				ND		6.3	ug/kg	ND		6.5	ug/kg	N/A			
4-Methyl-2-pentanone	1,000	NA	NA	N/A				ND		6.3	ug/kg	ND		6.5	ug/kg	N/A			
Acetone	50	500,000	50	N/A				ND		31	ug/kg	ND		32	ug/kg	N/A			
Benzene	60	44,000	60	N/A				ND		1.3	ug/kg	ND		1.3	ug/kg	N/A			
Bromodichloromethane	NA	NA	NA	N/A				ND		1.3	ug/kg	ND		1.3	ug/kg	N/A			
Bromoform	NA	NA	NA	N/A				ND		1.3	ug/kg	ND		1.3	ug/kg	N/A			
Bromomethane	NA	NA	NA	N/A				ND		1.3	ug/kg	ND		1.3	ug/kg	N/A			
Carbon Disulfide	2,700	NA	NA	N/A				ND		1.3	ug/kg	ND		1.3	ug/kg	N/A			
Carbon Tetrachloride	760	22,000	760	N/A				ND		1.3	ug/kg	ND		1.3	ug/kg	N/A			
Chlorobenzene	1,100	500,000	1,100	N/A				ND		1.3	ug/kg	ND		1.3	ug/kg	N/A			
Chloroethane	1,900	NA	NA	N/A				ND		1.3	ug/kg	ND		1.3	ug/kg	N/A			
Chloroform	370	350,000	370	N/A				ND		1.3	ug/kg	ND		1.3	ug/kg	N/A			
Chloromethane	NA	NA	NA	N/A				ND		1.3	ug/kg	ND		1.3	ug/kg	N/A			
cis-1,2-Dichloroethene	250	NA	NA	N/A				ND		1.3	ug/kg	ND		1.3	ug/kg	N/A			
cis-1,3-Dichloropropene	NA	NA	NA	N/A				ND		1.3	ug/kg	ND		1.3	ug/kg	N/A			
Cyclohexane	NA	NA	NA	N/A				ND		1.3	ug/kg	ND		1.3	ug/kg	N/A			
Dibromochloromethane	NA	NA	NA	N/A				ND		1.3	ug/kg	ND		1.3	ug/kg	N/A			
Dichlorodifluoromethane	NA	NA	NA	N/A				ND		13	ug/kg	ND		13	ug/kg	N/A			
Ethylbenzene	1,000	390,000	1,000	N/A				ND		1.3	ug/kg	ND		1.3	ug/kg	N/A			
Isopropylbenzene	NA	NA	NA	N/A				ND		1.3	ug/kg	ND		1.3	ug/kg	N/A			
m&p-Xylenes	260	NA	NA	N/A				ND		2.5	ug/kg	ND		2.6	ug/kg	N/A			
Methylcyclohexane	NA	NA	NA	N/A				ND		1.3	ug/kg	ND		1.3	ug/kg	N/A			
Methylene Chloride	50	500,000	50	N/A				ND		1.3	ug/kg	ND		1.3	ug/kg	N/A			
Methyl-tert-butyl Ether	930	NA	NA	N/A				ND		1.3	ug/kg	ND		1.3	ug/kg	N/A			
o-Xylene	260	NA	NA	N/A				ND		1.3	ug/kg	ND		1.3	ug/kg	N/A			
Styrene	NA	NA	NA	N/A				ND		1.3	ug/kg	ND		1.3	ug/kg	N/A			
tert-Butyl Alcohol	NA	NA	NA	N/A				ND		6.3	ug/kg	ND		6.5	ug/kg	N/A			
Tetrachloroethene	1,300	150,000	1,300	N/A				ND		1.3	ug/kg	ND		1.3	ug/kg	N/A			
Toluene	700	500,000	700	N/A				ND		1.3	ug/kg	ND		1.3	ug/kg	N/A			
trans-1,2-Dichloroethene	190	NA	NA	N/A				ND		1.3	ug/kg	ND		1.3	ug/kg	N/A			
trans-1,3-Dichloropropene	NA	NA	NA	N/A				ND		1.3	ug/kg	ND		1.3	ug/kg	N/A			
Trichloroethene	470	200,000	470	N/A				ND		1.3	ug/kg	ND		1.3	ug/kg	N/A			
Trichlorofluoromethane	NA	NA	NA	N/A				ND		1.3	ug/kg	ND		1.3	ug/kg	N/A			
Vinyl Chloride	20	13,000	20	N/A				ND		1.3	ug/kg	ND		1.3	ug/kg	N/A			

Shaded values indicate a Track 1 SCO exceedance
NA - Not Applicable
N/A - Not Analyzed
ND - Not Detected
SB - Soil Background
RL - Laboratory Reporting Limit

TABLE 2 - EXCEEDANCES OF SOIL/FILL SCOs
CONCORD HOTEL AND RESORT
TOWN OF THOMPSON, NEW YORK
NYSDEC BCP No. C353008
SESI CONSULTING ENGINEERS PROJECT # 7180

TestName	Unrestricted Track 1 SCO (ug/kg)	Protection of Public Health Commercial (ug/kg)	Protection of Groundwater (ug/kg)	OU-1A-15Dx20 Z0823304 8/20/08				OU-1A-15E Z0823305 8/20/08				OU-1A-18A Z0823215 8/19/08				OU-1A-T10A Y0823217 8/19/08			
				Result	Flg	RL	Units	Result	Flg	RL	Units	Result	Flg	RL	Units	Result	Flg	RL	Units
Semi Volatile Organics																			
(3 & 4)-Methylphenol	330	NA	NA	ND		1,300	ug/kg	ND		63	ug/kg	ND		58	ug/kg	N/A			
1,2,4-Trichlorobenzene	3,400	NA	NA	ND		1,300	ug/kg	ND		63	ug/kg	ND		58	ug/kg	N/A			
2,4,5-Trichlorophenol	100	NA	NA	ND		1,300	ug/kg	ND		63	ug/kg	ND		58	ug/kg	N/A			
2,4,6-Trichlorophenol	NA	NA	NA	ND		1,300	ug/kg	ND		63	ug/kg	ND		58	ug/kg	N/A			
2,4-Dichlorophenol	400	NA	NA	ND		1,300	ug/kg	ND		63	ug/kg	ND		58	ug/kg	N/A			
2,4-Dimethylphenol	NA	NA	NA	ND		1,300	ug/kg	ND		63	ug/kg	ND		58	ug/kg	N/A			
2,4-Dinitrophenol	200	NA	NA	ND		26,000	ug/kg	ND		1,300	ug/kg	ND		1,200	ug/kg	N/A			
2,4-Dinitrotoluene	NA	NA	NA	ND		1,300	ug/kg	ND		63	ug/kg	ND		58	ug/kg	N/A			
2,6-Dinitrotoluene	1,000	NA	NA	ND		1,300	ug/kg	ND		63	ug/kg	ND		58	ug/kg	N/A			
2-Chloronaphthalene	NA	NA	NA	ND		1,300	ug/kg	ND		63	ug/kg	ND		58	ug/kg	N/A			
2-Chlorophenol	800	NA	NA	ND		1,300	ug/kg	ND		63	ug/kg	ND		58	ug/kg	N/A			
2-Methyl-4,6-dinitrophenol	NA	NA	NA	ND		26,000	ug/kg	ND		1,300	ug/kg	ND		1,200	ug/kg	N/A			
2-Methylnaphthalene	36,400	NA	NA	ND		1,300	ug/kg	ND		63	ug/kg	ND		58	ug/kg	N/A			
2-Methylphenol	330	NA	NA	ND		1,300	ug/kg	ND		63	ug/kg	ND		58	ug/kg	N/A			
2-Nitroaniline	430	NA	NA	ND		1,300	ug/kg	ND		63	ug/kg	ND		58	ug/kg	N/A			
2-Nitrophenol	330	NA	NA	ND		1,300	ug/kg	ND		63	ug/kg	ND		58	ug/kg	N/A			
3,3'-Dichlorobenzidine	NA	NA	NA	ND		1,300	ug/kg	ND		63	ug/kg	ND		58	ug/kg	N/A			
3-Nitroaniline	500	NA	NA	ND		1,300	ug/kg	ND		63	ug/kg	ND		58	ug/kg	N/A			
4-Bromophenyl-phenylether	NA	NA	NA	ND		1,300	ug/kg	ND		63	ug/kg	ND		58	ug/kg	N/A			
4-Chloro-3-methylphenol	240	NA	NA	ND		1,300	ug/kg	ND		63	ug/kg	ND		58	ug/kg	N/A			
4-Chloroaniline	220	NA	NA	ND		1,300	ug/kg	ND		63	ug/kg	ND		58	ug/kg	N/A			
4-Chlorophenyl-phenylether	NA	NA	NA	ND		1,300	ug/kg	ND		63	ug/kg	ND		58	ug/kg	N/A			
4-Nitroaniline	NA	NA	NA	ND		1,300	ug/kg	ND		63	ug/kg	ND		58	ug/kg	N/A			
4-Nitrophenol	100	NA	NA	ND		1,300	ug/kg	ND		63	ug/kg	ND		58	ug/kg	N/A			
Acenaphthene	20,000	500,000	98,000	1,900		1,300	ug/kg	78		63	ug/kg	ND		58	ug/kg	N/A			
Acenaphthylene	100,000	500,000	107,000	ND		1,300	ug/kg	ND		63	ug/kg	ND		58	ug/kg	N/A			
Aniline	100	NA	NA	ND		1,300	ug/kg	ND		63	ug/kg	ND		58	ug/kg	N/A			
Anthracene	100,000	500,000	1,000,000	3,000		1,300	ug/kg	71		63	ug/kg	ND		58	ug/kg	N/A			
Benzo(a)anthracene	1,000	5,600	1,000	2,300		1,300	ug/kg	100		63	ug/kg	ND		58	ug/kg	N/A			
Benzo(a)pyrene	1,000	1,000	22,000	1,300		1,300	ug/kg	ND		63	ug/kg	ND		58	ug/kg	N/A			
Benzo(b)fluoranthene	1,000	5,600	1,700	ND		1,300	ug/kg	ND		63	ug/kg	ND		58	ug/kg	N/A			
Benzo(g,h,i)perylene	100,000	500,000	1,000,000	ND		1,300	ug/kg	ND		63	ug/kg	ND		58	ug/kg	N/A			
Benzo(k)fluoranthene	800	56,000	1,700	ND		1,300	ug/kg	ND		63	ug/kg	ND		58	ug/kg	N/A			
bis(2-Chloroethoxy)methane	NA	NA	NA	ND		1,300	ug/kg	ND		63	ug/kg	ND		58	ug/kg	N/A			
bis(2-Chloroethyl)ether	NA	NA	NA	ND		1,300	ug/kg	ND		63	ug/kg	ND		58	ug/kg	N/A			
bis(2-Ethylhexyl)phthalate	50,000	NA	NA	ND		1,300	ug/kg	ND		130	ug/kg	ND		120	ug/kg	N/A			
Butylbenzylphthalate	50,000	NA	NA	ND		1,300	ug/kg	ND		63	ug/kg	ND		58	ug/kg	N/A			
Carbazole	NA	NA	NA	ND		1,300	ug/kg	ND		63	ug/kg	ND		58	ug/kg	N/A			
Chrysene	1,000	56,000	1,000	3,700		1,300	ug/kg	190		63	ug/kg	ND		58	ug/kg	N/A			
Dibenz(a,h)anthracene	330	560	1,000,000	ND		1,300	ug/kg	ND		63	ug/kg	ND		58	ug/kg	N/A			

Shaded values indicate a Track 1 SCO exceedance
NA - Not Applicable
N/A - Not Analyzed
ND - Not Detected
SB - Soil Background
RL - Laboratory Reporting Limit

TABLE 2 - EXCEEDANCES OF SOIL/FILL SCOs
CONCORD HOTEL AND RESORT
TOWN OF THOMPSON, NEW YORK
NYSDEC BCP No. C353008
SESI CONSULTING ENGINEERS PROJECT # 7180

TestName	Unrestricted Track 1 SCO (ug/kg)	Protection of Public Health Commercial (ug/kg)	Protection of Groundwater (ug/kg)	OU-1A-15Dx20 Z0823304 8/20/08				OU-1A-15E Z0823305 8/20/08				OU-1A-18A Z0823215 8/19/08				OU-1A-T10A Y0823217 8/19/08			
				Result	Flg	RL	Units	Result	Flg	RL	Units	Result	Flg	RL	Units	Result	Flg	RL	Units
Dibenzofuran	7,000	NA	NA	ND		1,300	ug/kg	ND		63	ug/kg	ND		58	ug/kg	N/A			
Diethylphthalate	7,100	NA	NA	ND		1,300	ug/kg	ND		63	ug/kg	ND		58	ug/kg	N/A			
Dimethylphthalate	2,000	NA	NA	ND		1,300	ug/kg	ND		63	ug/kg	ND		58	ug/kg	N/A			
Di-n-butylphthalate	8,100	NA	NA	ND		1,300	ug/kg	ND		63	ug/kg	ND		58	ug/kg	N/A			
Di-n-Octylphthalate	50,000	NA	NA	ND		1,300	ug/kg	ND		63	ug/kg	ND		58	ug/kg	N/A			
Diphenylamine	NA	NA	NA	ND		1,300	ug/kg	170		63	ug/kg	ND		58	ug/kg	N/A			
Fluoranthene	100,000	500,000	1,000,000	2,000		1,300	ug/kg	68		63	ug/kg	ND		58	ug/kg	N/A			
Fluorene	30,000	500,000	386,000	2,400		1,300	ug/kg	87		63	ug/kg	ND		58	ug/kg	N/A			
Hexachlorobenzene	330	6,000	3,200	ND		1,300	ug/kg	ND		63	ug/kg	ND		58	ug/kg	N/A			
Hexachlorobutadiene	NA	NA	NA	ND		1,300	ug/kg	ND		63	ug/kg	ND		58	ug/kg	N/A			
Hexachlorocyclopentadiene	NA	NA	NA	ND		1,300	ug/kg	ND		63	ug/kg	ND		58	ug/kg	N/A			
Hexachloroethane	NA	NA	NA	ND		1,300	ug/kg	ND		63	ug/kg	ND		58	ug/kg	N/A			
Indeno(1,2,3-cd)pyrene	500	5,600	8,200	ND		1,300	ug/kg	ND		63	ug/kg	ND		58	ug/kg	N/A			
Isophorone	4,400	NA	NA	ND		1,300	ug/kg	ND		63	ug/kg	ND		58	ug/kg	N/A			
Naphthalene	12,000	500,000	12,000	ND		1,300	ug/kg	ND		63	ug/kg	ND		58	ug/kg	N/A			
Nitrobenzene	200	NA	NA	ND		1,300	ug/kg	ND		63	ug/kg	ND		58	ug/kg	N/A			
n-Nitroso-di-n-propylamine	NA	NA	NA	ND		1,300	ug/kg	ND		63	ug/kg	ND		58	ug/kg	N/A			
Pentachlorophenol	800	6,700	800	ND		1,300	ug/kg	ND		63	ug/kg	ND		58	ug/kg	N/A			
Phenanthrene	100,000	500,000	1,000,000	11,000		1,300	ug/kg	420		63	ug/kg	ND		58	ug/kg	N/A			
Phenol	330	500,000	330	ND		1,300	ug/kg	ND		63	ug/kg	ND		58	ug/kg	N/A			
Pyrene	100,000	500,000	1,000,000	7,200		1,300	ug/kg	260		63	ug/kg	ND		58	ug/kg	N/A			
TPH	NA	NA	NA	4,600,000		93,000	ug/kg	180,000		93,000	ug/kg	ND		93,000	ug/kg	N/A			
Pesticides																			
4,4'-DDD	3.3	92,000	14,000	N/A				N/A				N/A				N/A			
4,4'-DDE	3.3	62,000	17,000	N/A				N/A				N/A				N/A			
4,4'-DDT	3.3	47,000	136,000	N/A				N/A				N/A				N/A			
Aldrin	5	680	190	N/A				N/A				N/A				N/A			
alpha-BHC	20	3,400	20	N/A				N/A				N/A				N/A			
alpha-Chlordane	94	24,000	2,900	N/A				N/A				N/A				N/A			
beta-BHC	36	3,000	90	N/A				N/A				N/A				N/A			
delta-BHC	40	500,000	250	N/A				N/A				N/A				N/A			
Dieldrin	5	1,400	100	N/A				N/A				N/A				N/A			
Endosulfan I	2,400	200,000	102,000	N/A				N/A				N/A				N/A			
Endosulfan II	2,400	200,000	102,000	N/A				N/A				N/A				N/A			
Endosulfan sulfate	2,400	200,000	1,000,000	N/A				N/A				N/A				N/A			
Endrin	14	89,000	60	N/A				N/A				N/A				N/A			
Endrin aldehyde	NA	NA	NA	N/A				N/A				N/A				N/A			
Endrin ketone	NA	NA	NA	N/A				N/A				N/A				N/A			
gamma-BHC	100	NA	NA	N/A				N/A				N/A				N/A			
gamma-Chlordane	94	NA	NA	N/A				N/A				N/A				N/A			
Heptachlor	42	15,000	380	N/A				N/A				N/A				N/A			
Heptachlor epoxide	20	NA	NA	N/A				N/A				N/A				N/A			
Methoxychlor	10,000	NA	NA	N/A				N/A				N/A				N/A			

Shaded values indicate a Track 1 SCO exceedance
NA - Not Applicable
N/A - Not Analyzed
ND - Not Detected
SB - Soil Background
RL - Laboratory Reporting Limit

TABLE 2 - EXCEEDANCES OF SOIL/FILL SCOs
CONCORD HOTEL AND RESORT
TOWN OF THOMPSON, NEW YORK
NYSDEC BCP No. C353008
SESI CONSULTING ENGINEERS PROJECT # 7180

TestName	Unrestricted Track 1 SCO (ug/kg)	Protection of Public Health Commercial (ug/kg)	Protection of Groundwater (ug/kg)	OU-1A-15Dx20 Z0823304 8/20/08				OU-1A-15E Z0823305 8/20/08				OU-1A-18A Z0823215 8/19/08				OU-1A-T10A Y0823217 8/19/08			
				Result	Flg	RL	Units	Result	Flg	RL	Units	Result	Flg	RL	Units	Result	Flg	RL	Units
PCB's																			
Aroclor 1221-1	100	1,000	3,200	N/A				N/A				N/A				ND		62	ug/kg
Aroclor 1221-2	100	1,000	3,200	N/A				N/A				N/A				ND		62	ug/kg
Aroclor 1221-3	100	1,000	3,200	N/A				N/A				N/A				ND		62	ug/kg
Aroclor 1232-1	100	1,000	3,200	N/A				N/A				N/A				ND		62	ug/kg
Aroclor 1232-2	100	1,000	3,200	N/A				N/A				N/A				ND		62	ug/kg
Aroclor 1232-3	100	1,000	3,200	N/A				N/A				N/A				ND		62	ug/kg
Aroclor 1242-1	100	1,000	3,200	N/A				N/A				N/A				ND		62	ug/kg
Aroclor 1242-2	100	1,000	3,200	N/A				N/A				N/A				ND		62	ug/kg
Aroclor 1242-3	100	1,000	3,200	N/A				N/A				N/A				ND		62	ug/kg
Aroclor 1248-1	100	1,000	3,200	N/A				N/A				N/A				ND		62	ug/kg
Aroclor 1248-2	100	1,000	3,200	N/A				N/A				N/A				ND		62	ug/kg
Aroclor 1248-3	100	1,000	3,200	N/A				N/A				N/A				ND		62	ug/kg
Aroclor 1254-1	100	1,000	3,200	N/A				N/A				N/A				ND		62	ug/kg
Aroclor 1254-2	100	1,000	3,200	N/A				N/A				N/A				ND		62	ug/kg
Aroclor 1254-3	100	1,000	3,200	N/A				N/A				N/A				ND		62	ug/kg
Aroclor 1016-1	100	1,000	3,200	N/A				N/A				N/A				ND		62	ug/kg
Aroclor 1016-2	100	1,000	3,200	N/A				N/A				N/A				ND		62	ug/kg
Aroclor 1016-3	100	1,000	3,200	N/A				N/A				N/A				ND		62	ug/kg
Aroclor 1260-1	100	1,000	3,200	N/A				N/A				N/A				65		62	ug/kg
Aroclor 1260-2	100	1,000	3,200	N/A				N/A				N/A				68		62	ug/kg
Aroclor 1260-3	100	1,000	3,200	N/A				N/A				N/A				81		62	ug/kg
Metals	(mg/kg)	(mg/kg)	(mg/kg)																
Mercury	0.18	2.8	0.18	N/A				N/A				N/A				N/A			
Aluminum	SB	NA	NA	N/A				N/A				N/A				N/A			
Antimony	SB	NA	NA	N/A				N/A				N/A				N/A			
Arsenic	13	16	16	N/A				N/A				N/A				N/A			
Barium	350	400	820	N/A				N/A				N/A				N/A			
Beryllium	7.2	590	47	N/A				N/A				N/A				N/A			
Cadmium	2.5	9.3	7.5	N/A				N/A				N/A				N/A			
Calcium	SB	NA	NA	N/A				N/A				N/A				N/A			
Chromium	30	1,500	NA	N/A				N/A				N/A				N/A			
Cobalt	30 or SB	NA	NA	N/A				N/A				N/A				N/A			
Copper	50	270	1,720	N/A				N/A				N/A				N/A			
Iron	2,000 or SB	NA	NA	N/A				N/A				N/A				N/A			
Lead	63	1,000	450	N/A				N/A				N/A				N/A			
Magnesium	SB	NA	NA	N/A				N/A				N/A				N/A			
Manganese	1,600	10,000	2,000	N/A				N/A				N/A				N/A			
Nickel	30	310	130	N/A				N/A				N/A				N/A			
Potassium	SB	NA	NA	N/A				N/A				N/A				N/A			
Selenium	3.9	1,500	4	N/A				N/A				N/A				N/A			
Silver	2	1,500	8.3	N/A				N/A				N/A				N/A			
Sodium	SB	NA	NA	N/A				N/A				N/A				N/A			
Thallium	SB	NA	NA	N/A				N/A				N/A				N/A			
Vanadium	150 or SB	NA	NA	N/A				N/A				N/A				N/A			
Zinc	109	10,000	2,480	N/A				N/A				N/A				N/A			
Other Parameters																			
Cyanide	27	27	40	N/A				N/A				N/A				N/A			

Shaded values indicate a Track 1 SCO exceedance
NA - Not Applicable
N/A - Not Analyzed
ND - Not Detected
SB - Soil Background
RL - Laboratory Reporting Limit

TABLE 2 - EXCEEDANCES OF SOIL/FILL SCOs
CONCORD HOTEL AND RESORT
TOWN OF THOMPSON, NEW YORK
NYSDEC BCP No. C353008
SESI CONSULTING ENGINEERS PROJECT # 7180

TestName	Unrestricted Track 1 SCO (ug/kg)	Protection of Public Health Commercial (ug/kg)	Protection of Groundwater (ug/kg)	OU-1A-T10B 08090651-03 9/17/08				OU-1A-T10A 08090651-01 9/17/08				OU-1A-T10B 08090451-02 9/17/08			
				Result	Flg	RL	Units	Result	Flg	RL	Units	Result	Flg	RL	Units
Volatile Organics															
1,1,1-Trichloroethane	680	500,000	680	N/A				N/A				N/A			
1,1,2,2-Tetrachloroethane	600	NA	NA	N/A				N/A				N/A			
1,1,2-Trichloroethane	NA	NA	NA	N/A				N/A				N/A			
1,1,2-Trichlorotrifluoroethane	6,000	NA	NA	N/A				N/A				N/A			
1,1-Dichloroethane	270	240,000	270	N/A				N/A				N/A			
1,1-Dichloroethene	330	500,000	330	N/A				N/A				N/A			
1,2-Dibromo-3-chloropropane	NA	NA	NA	N/A				N/A				N/A			
1,2-Dibromoethane	NA	NA	NA	N/A				N/A				N/A			
1,2-Dichlorobenzene	1,100	500,000	1,100	N/A				N/A				N/A			
1,2-Dichloroethane	20	30,000	20	N/A				N/A				N/A			
1,2-Dichloropropane	NA	NA	NA	N/A				N/A				N/A			
1,3-Dichlorobenzene	2,400	280,000	2,400	N/A				N/A				N/A			
1,4-Dichlorobenzene	1,800	130,000	1,800	N/A				N/A				N/A			
2-Butanone	120	NA	NA	N/A				N/A				N/A			
2-Hexanone	NA	NA	NA	N/A				N/A				N/A			
4-Methyl-2-pentanone	1,000	NA	NA	N/A				N/A				N/A			
Acetone	50	500,000	50	N/A				N/A				N/A			
Benzene	60	44,000	60	N/A				N/A				N/A			
Bromodichloromethane	NA	NA	NA	N/A				N/A				N/A			
Bromoform	NA	NA	NA	N/A				N/A				N/A			
Bromomethane	NA	NA	NA	N/A				N/A				N/A			
Carbon Disulfide	2,700	NA	NA	N/A				N/A				N/A			
Carbon Tetrachloride	760	22,000	760	N/A				N/A				N/A			
Chlorobenzene	1,100	500,000	1,100	N/A				N/A				N/A			
Chloroethane	1,900	NA	NA	N/A				N/A				N/A			
Chloroform	370	350,000	370	N/A				N/A				N/A			
Chloromethane	NA	NA	NA	N/A				N/A				N/A			
cis-1,2-Dichloroethene	250	NA	NA	N/A				N/A				N/A			
cis-1,3-Dichloropropene	NA	NA	NA	N/A				N/A				N/A			
Cyclohexane	NA	NA	NA	N/A				N/A				N/A			
Dibromochloromethane	NA	NA	NA	N/A				N/A				N/A			
Dichlorodifluoromethane	NA	NA	NA	N/A				N/A				N/A			
Ethylbenzene	1,000	390,000	1,000	N/A				N/A				N/A			
Isopropylbenzene	NA	NA	NA	N/A				N/A				N/A			
m&p-Xylenes	260	NA	NA	N/A				N/A				N/A			
Methylcyclohexane	NA	NA	NA	N/A				N/A				N/A			
Methylene Chloride	50	500,000	50	N/A				N/A				N/A			
Methyl-tert-butyl Ether	930	NA	NA	N/A				N/A				N/A			
o-Xylene	260	NA	NA	N/A				N/A				N/A			
Styrene	NA	NA	NA	N/A				N/A				N/A			
tert-Butyl Alcohol	NA	NA	NA	N/A				N/A				N/A			
Tetrachloroethene	1,300	150,000	1,300	N/A				N/A				N/A			
Toluene	700	500,000	700	N/A				N/A				N/A			
trans-1,2-Dichloroethene	190	NA	NA	N/A				N/A				N/A			
trans-1,3-Dichloropropene	NA	NA	NA	N/A				N/A				N/A			
Trichloroethene	470	200,000	470	N/A				N/A				N/A			
Trichlorofluoromethane	NA	NA	NA	N/A				N/A				N/A			
Vinyl Chloride	20	13,000	20	N/A				N/A				N/A			

Shaded values indicate a Track 1 SCO exceedance
NA - Not Applicable
N/A - Not Analyzed
ND - Not Detected
SB - Soil Background
RL - Laboratory Reporting Limit

TABLE 2 - EXCEEDANCES OF SOIL/FILL SCOs
CONCORD HOTEL AND RESORT
TOWN OF THOMPSON, NEW YORK
NYSDEC BCP No. C353008
SESI CONSULTING ENGINEERS PROJECT # 7180

TestName	Unrestricted Track 1 SCO (ug/kg)	Protection of Public Health Commercial (ug/kg)	Protection of Groundwater (ug/kg)	OU-1A-T10B 08090651-03 9/17/08				OU-1A-T10A 08090651-01 9/17/08				OU-1A-T10B 08090451-02 9/17/08			
				Result	Flg	RL	Units	Result	Flg	RL	Units	Result	Flg	RL	Units
Semi Volatile Organics															
(3 & 4)-Methylphenol	330	NA	NA	N/A				N/A				N/A			
1,2,4-Trichlorobenzene	3,400	NA	NA	N/A				N/A				N/A			
2,4,5-Trichlorophenol	100	NA	NA	N/A				N/A				N/A			
2,4,6-Trichlorophenol	NA	NA	NA	N/A				N/A				N/A			
2,4-Dichlorophenol	400	NA	NA	N/A				N/A				N/A			
2,4-Dimethylphenol	NA	NA	NA	N/A				N/A				N/A			
2,4-Dinitrophenol	200	NA	NA	N/A				N/A				N/A			
2,4-Dinitrotoluene	NA	NA	NA	N/A				N/A				N/A			
2,6-Dinitrotoluene	1,000	NA	NA	N/A				N/A				N/A			
2-Chloronaphthalene	NA	NA	NA	N/A				N/A				N/A			
2-Chlorophenol	800	NA	NA	N/A				N/A				N/A			
2-Methyl-4,6-dinitrophenol	NA	NA	NA	N/A				N/A				N/A			
2-Methylnaphthalene	36,400	NA	NA	N/A				N/A				N/A			
2-Methylphenol	330	NA	NA	N/A				N/A				N/A			
2-Nitroaniline	430	NA	NA	N/A				N/A				N/A			
2-Nitrophenol	330	NA	NA	N/A				N/A				N/A			
3,3'-Dichlorobenzidine	NA	NA	NA	N/A				N/A				N/A			
3-Nitroaniline	500	NA	NA	N/A				N/A				N/A			
4-Bromophenyl-phenylether	NA	NA	NA	N/A				N/A				N/A			
4-Chloro-3-methylphenol	240	NA	NA	N/A				N/A				N/A			
4-Chloroaniline	220	NA	NA	N/A				N/A				N/A			
4-Chlorophenyl-phenylether	NA	NA	NA	N/A				N/A				N/A			
4-Nitroaniline	NA	NA	NA	N/A				N/A				N/A			
4-Nitrophenol	100	NA	NA	N/A				N/A				N/A			
Acenaphthene	20,000	500,000	98,000	N/A				N/A				N/A			
Acenaphthylene	100,000	500,000	107,000	N/A				N/A				N/A			
Aniline	100	NA	NA	N/A				N/A				N/A			
Anthracene	100,000	500,000	1,000,000	N/A				N/A				N/A			
Benzo(a)anthracene	1,000	5,600	1,000	N/A				N/A				N/A			
Benzo(a)pyrene	1,000	1,000	22,000	N/A				N/A				N/A			
Benzo(b)fluoranthene	1,000	5,600	1,700	N/A				N/A				N/A			
Benzo(g,h,i)perylene	100,000	500,000	1,000,000	N/A				N/A				N/A			
Benzo(k)fluoranthene	800	56,000	1,700	N/A				N/A				N/A			
bis(2-Chloroethoxy)methane	NA	NA	NA	N/A				N/A				N/A			
bis(2-Chloroethyl)ether	NA	NA	NA	N/A				N/A				N/A			
bis(2-Ethylhexyl)phthalate	50,000	NA	NA	N/A				N/A				N/A			
Butylbenzylphthalate	50,000	NA	NA	N/A				N/A				N/A			
Carbazole	NA	NA	NA	N/A				N/A				N/A			
Chrysene	1,000	56,000	1,000	N/A				N/A				N/A			
Dibenz(a,h)anthracene	330	560	1,000,000	N/A				N/A				N/A			

Shaded values indicate a Track 1 SCO exceedance
NA - Not Applicable
N/A - Not Analyzed
ND - Not Detected
SB - Soil Background
RL - Laboratory Reporting Limit

TABLE 2 - EXCEEDANCES OF SOIL/FILL SCOs
CONCORD HOTEL AND RESORT
TOWN OF THOMPSON, NEW YORK
NYSDEC BCP No. C353008
SESI CONSULTING ENGINEERS PROJECT # 7180

TestName	Unrestricted Track 1 SCO (ug/kg)	Protection of Public Health Commercial (ug/kg)	Protection of Groundwater (ug/kg)	OU-1A-T10B 08090651-03 9/17/08				OU-1A-T10A 08090651-01 9/17/08				OU-1A-T10B 08090451-02 9/17/08			
				Result	Flg	RL	Units	Result	Flg	RL	Units	Result	Flg	RL	Units
Dibenzofuran	7,000	NA	NA	N/A				N/A				N/A			
Diethylphthalate	7,100	NA	NA	N/A				N/A				N/A			
Dimethylphthalate	2,000	NA	NA	N/A				N/A				N/A			
Di-n-butylphthalate	8,100	NA	NA	N/A				N/A				N/A			
Di-n-Octylphthalate	50,000	NA	NA	N/A				N/A				N/A			
Diphenylamine	NA	NA	NA	N/A				N/A				N/A			
Fluoranthene	100,000	500,000	1,000,000	N/A				N/A				N/A			
Fluorene	30,000	500,000	386,000	N/A				N/A				N/A			
Hexachlorobenzene	330	6,000	3,200	N/A				N/A				N/A			
Hexachlorobutadiene	NA	NA	NA	N/A				N/A				N/A			
Hexachlorocyclopentadiene	NA	NA	NA	N/A				N/A				N/A			
Hexachloroethane	NA	NA	NA	N/A				N/A				N/A			
Indeno(1,2,3-cd)pyrene	500	5,600	8,200	N/A				N/A				N/A			
Isophorone	4,400	NA	NA	N/A				N/A				N/A			
Naphthalene	12,000	500,000	12,000	N/A				N/A				N/A			
Nitrobenzene	200	NA	NA	N/A				N/A				N/A			
n-Nitroso-di-n-propylamine	NA	NA	NA	N/A				N/A				N/A			
Pentachlorophenol	800	6,700	800	N/A				N/A				N/A			
Phenanthrene	100,000	500,000	1,000,000	N/A				N/A				N/A			
Phenol	330	500,000	330	N/A				N/A				N/A			
Pyrene	100,000	500,000	1,000,000	N/A				N/A				N/A			
TPH	NA	NA	NA	N/A				N/A				N/A			
Pesticides															
4,4'-DDD	3.3	92,000	14,000	N/A				N/A				N/A			
4,4'-DDE	3.3	62,000	17,000	N/A				N/A				N/A			
4,4'-DDT	3.3	47,000	136,000	N/A				N/A				N/A			
Aldrin	5	680	190	N/A				N/A				N/A			
alpha-BHC	20	3,400	20	N/A				N/A				N/A			
alpha-Chlordane	94	24,000	2,900	N/A				N/A				N/A			
beta-BHC	36	3,000	90	N/A				N/A				N/A			
delta-BHC	40	500,000	250	N/A				N/A				N/A			
Dieldrin	5	1,400	100	N/A				N/A				N/A			
Endosulfan I	2,400	200,000	102,000	N/A				N/A				N/A			
Endosulfan II	2,400	200,000	102,000	N/A				N/A				N/A			
Endosulfan sulfate	2,400	200,000	1,000,000	N/A				N/A				N/A			
Endrin	14	89,000	60	N/A				N/A				N/A			
Endrin aldehyde	NA	NA	NA	N/A				N/A				N/A			
Endrin ketone	NA	NA	NA	N/A				N/A				N/A			
gamma-BHC	100	NA	NA	N/A				N/A				N/A			
gamma-Chlordane	94	NA	NA	N/A				N/A				N/A			
Heptachlor	42	15,000	380	N/A				N/A				N/A			
Heptachlor epoxide	20	NA	NA	N/A				N/A				N/A			
Methoxychlor	10,000	NA	NA	N/A				N/A				N/A			

Shaded values indicate a Track 1 SCO exceedance
NA - Not Applicable
N/A - Not Analyzed
ND - Not Detected
SB - Soil Background
RL - Laboratory Reporting Limit

TABLE 2 - EXCEEDANCES OF SOIL/FILL SCOs
CONCORD HOTEL AND RESORT
TOWN OF THOMPSON, NEW YORK
NYSDEC BCP No. C353008
SESI CONSULTING ENGINEERS PROJECT # 7180

TestName	Unrestricted Track 1 SCO (ug/kg)	Protection of Public Health Commercial (ug/kg)	Protection of Groundwater (ug/kg)	OU-1A-T10B 08090651-03 9/17/08				OU-1A-T10A 08090651-01 9/17/08				OU-1A-T10B 08090451-02 9/17/08			
				Result	Flg	RL	Units	Result	Flg	RL	Units	Result	Flg	RL	Units
PCB's															
Aroclor 1221-1	100	1,000	3,200	ND		17.7	ug/kg	ND		18.9	ug/kg	ND		18.5	ug/kg
Aroclor 1221-2	100	1,000	3,200	ND		17.7	ug/kg	ND		18.9	ug/kg	ND		18.5	ug/kg
Aroclor 1221-3	100	1,000	3,200	ND		17.7	ug/kg	ND		18.9	ug/kg	ND		18.5	ug/kg
Aroclor 1232-1	100	1,000	3,200	ND		17.7	ug/kg	ND		18.9	ug/kg	ND		18.5	ug/kg
Aroclor 1232-2	100	1,000	3,200	ND		17.7	ug/kg	ND		18.9	ug/kg	ND		18.5	ug/kg
Aroclor 1232-3	100	1,000	3,200	ND		17.7	ug/kg	ND		18.9	ug/kg	ND		18.5	ug/kg
Aroclor 1242-1	100	1,000	3,200	ND		17.7	ug/kg	ND		18.9	ug/kg	ND		18.5	ug/kg
Aroclor 1242-2	100	1,000	3,200	ND		17.7	ug/kg	ND		18.9	ug/kg	ND		18.5	ug/kg
Aroclor 1242-3	100	1,000	3,200	ND		17.7	ug/kg	ND		18.9	ug/kg	ND		18.5	ug/kg
Aroclor 1248-1	100	1,000	3,200	ND		17.7	ug/kg	ND		18.9	ug/kg	ND		18.5	ug/kg
Aroclor 1248-2	100	1,000	3,200	ND		17.7	ug/kg	ND		18.9	ug/kg	ND		18.5	ug/kg
Aroclor 1248-3	100	1,000	3,200	ND		17.7	ug/kg	ND		18.9	ug/kg	ND		18.5	ug/kg
Aroclor 1254-1	100	1,000	3,200	ND		17.7	ug/kg	ND		18.9	ug/kg	ND		18.5	ug/kg
Aroclor 1254-2	100	1,000	3,200	ND		17.7	ug/kg	ND		18.9	ug/kg	ND		18.5	ug/kg
Aroclor 1254-3	100	1,000	3,200	ND		17.7	ug/kg	ND		18.9	ug/kg	ND		18.5	ug/kg
Aroclor 1016-1	100	1,000	3,200	ND		17.7	ug/kg	ND		18.9	ug/kg	ND		18.5	ug/kg
Aroclor 1016-2	100	1,000	3,200	ND		17.7	ug/kg	ND		18.9	ug/kg	ND		18.5	ug/kg
Aroclor 1016-3	100	1,000	3,200	ND		17.7	ug/kg	ND		18.9	ug/kg	ND		18.5	ug/kg
Aroclor 1260-1	100	1,000	3,200	ND		17.7	ug/kg	80		18.9	ug/kg	ND		18.5	ug/kg
Aroclor 1260-2	100	1,000	3,200	ND		17.7	ug/kg	80		18.9	ug/kg	ND		18.5	ug/kg
Aroclor 1260-3	100	1,000	3,200	ND		17.7	ug/kg	80		18.9	ug/kg	ND		18.5	ug/kg
Metals	(mg/kg)	(mg/kg)	(mg/kg)												
Mercury	0.18	2.8	0.18	N/A				N/A				N/A			
Aluminum	SB	NA	NA	N/A				N/A				N/A			
Antimony	SB	NA	NA	N/A				N/A				N/A			
Arsenic	13	16	16	N/A				N/A				N/A			
Barium	350	400	820	N/A				N/A				N/A			
Beryllium	7.2	590	47	N/A				N/A				N/A			
Cadmium	2.5	9.3	7.5	N/A				N/A				N/A			
Calcium	SB	NA	NA	N/A				N/A				N/A			
Chromium	30	1,500	NA	N/A				N/A				N/A			
Cobalt	30 or SB	NA	NA	N/A				N/A				N/A			
Copper	50	270	1,720	N/A				N/A				N/A			
Iron	2,000 or SB	NA	NA	N/A				N/A				N/A			
Lead	63	1,000	450	N/A				N/A				N/A			
Magnesium	SB	NA	NA	N/A				N/A				N/A			
Manganese	1,600	10,000	2,000	N/A				N/A				N/A			
Nickel	30	310	130	N/A				N/A				N/A			
Potassium	SB	NA	NA	N/A				N/A				N/A			
Selenium	3.9	1,500	4	N/A				N/A				N/A			
Silver	2	1,500	8.3	N/A				N/A				N/A			
Sodium	SB	NA	NA	N/A				N/A				N/A			
Thallium	SB	NA	NA	N/A				N/A				N/A			
Vanadium	150 or SB	NA	NA	N/A				N/A				N/A			
Zinc	109	10,000	2,480	N/A				N/A				N/A			
Other Parameters															
Cyanide	27	27	40	N/A				N/A				N/A			

Shaded values indicate a Track 1 SCO exceedance
NA - Not Applicable
N/A - Not Analyzed
ND - Not Detected
SB - Soil Background
RL - Laboratory Reporting Limit

TABLE 7 – PROJECT PERSONNEL
CONCORD HOTEL AND RESORT
TOWN OF THOMPSON, NEW YORK
NYSDEC BCP No. C353008
SESI CONSULTING ENGINEERS PROJECT # 7180

Name	Company	Project Position	Address	Phone Number
Bruce Berg Joe Apicella	Concord Associates, LP	Volunteer Contact	115 Stevens Avenue Valhalla, NY 10595	(914) 769-6500
Steven P. Byszewski PE	SESI Consulting Engineers, P.C.	Environmental Consultant's Project Manager	12A Maple Avenue Pine Brook, NJ 07058	(973) 808-9050
Michael St. Pierre, PE	SESI Consulting Engineers, P.C.	Remedial Engineer	12A Maple Avenue Pine Brook, NJ 07058	(973) 808-9050
Michael Ryan James Candiloro	NYSDEC	Project Manager	625 Broadway Albany, NY 12233	(512) 402-9564
Fay Navratil	NYSDOH	Bureau of Environmental Exposure Investigation	Flanigan Square 547 River St, Rm 300 Troy, NY 12180	(518) 402-7860

TABLE 9 - EMERGENCY AND CONTACT NUMBERS

CONCORD HOTEL AND RESORT
TOWN OF THOMPSON, NEW YORK
NYSDEC BCP No. C353008
SESI CONSULTING ENGINEERS PROJECT # 7180

Medical, Fire, and Police:	911
One Call Center:	(800) 272-4480 (3 day notice required for utility markout)
Poison Control Center:	(800) 222-1222
Pollution Toxic Chemical Oil Spills:	(800) 424-8802
NYSDEC Spills Hotline	(800) 457-7362

Michael St. Pierre – Remedial Engineer (SESI Consulting Engineers)	(973) 808-9050
Bernie Ruf - Director of Construction (Concord Associates)	(845) 794-0949 (ext 19)

* Note: Contact numbers subject to change and will be updated as necessary

TABLE 10 - ESTIMATED COSTS FOR REMEDIAL ACTIVITY
(order of magnitude estimates)
CONCORD HOTEL AND RESORT
TOWN OF THOMPSON, SULLIVAN COUNT, NEW YORK
SESI PROJECT # 7180

Item	Track 1 Cost	Track 4 Cost	Track 2 cost
UST Removals (1-20,000 gallon UST; 2-15,000 gallon USTs; 1-1,500 gallon UST)	$115,000	$115,000	115000
Excavation and Backfilling	$2,200,000	$640,000	1140000
Sheeting and Bracing of Excavation	$1,200,000	NA	900000
Installation of Additional Monitoring Wells	$20,000	$20,000	20000
Placement of Low Permeability Clean Cover Soil (landscaped areas)	NA	$175,000	NA
Final Engineering Report	$25,000	$25,000	25000
Project Management & Regulatory Liasion (~ 10% of overall costs)	$356,000	$97,500	$220,000
Contingency (~ 10% of overall costs)	$391,600	$107,250	$242,000
Total	**$4,307,600**	**$1,179,750**	**$2,662,000**

TABLE 11 - VOLUME, LOCATION, DEPTH, AND CONCENTRATION OF IMPACTS
CONCORD HOTEL AND RESORT
TOWN OF THOMPSON, SULLIVAN COUNT, NEW YORK
NYSDEC BCP No. C353008
SESI CONSULTING ENGINEERS PROJECT # 7180

Soil Impacts					
Location / Borings	**Depth**	**Type of Contamination**	**Concentration (mg/kg)**	**Volume (yd^3)**	**Assumptions and Comments**
OU-1A-1	0 - 6"	Lead	155	327	Only metals, and only copper at depth; assume 1.5' and 3' depths and 25' radius impacted
	28' - 29'	Copper	203		
OU-1A-6	0-6"	Pesticides	29	109	Surface contamination, assume 1.5' depth and 25' radius impacted
OU-1A-9	0-6"	SVOC	34.5	109	Surface contamination, fill, assume 1.5' depth and 25' radius impacted
	0-6"	Metals	399.7		
OU-1A-10	7.5'-8'	SVOC	1.2	204	PID hits to 11', assume soil removal to 11' below grade
OU-1A-13	0-6"	SVOC	4	109	Surface contamination, assume 1.5' depth and 25' radius impacted
OU-1A-15	6.5'-7'	SVOC	47	642	Soil removal to 25.5' below grade based on PID hits
OU-1A-15	11'-12'	SVOC	10.8		
OU-1A-15	21'-21.5'	SVOC	7.3		

TABLE 11 - VOLUME, LOCATION, DEPTH, AND CONCENTRATION OF IMPACTS
CONCORD HOTEL AND RESORT
TOWN OF THOMPSON, SULLIVAN COUNT, NEW YORK
NYSDEC BCP No. C353008
SESI CONSULTING ENGINEERS PROJECT # 7180

LNAPL and Groundwater Impacts			
LNAPL Plume	Approximately 10,000 square feet impacted in OU-1.	9,000 gallons	Assume varying from 3" thickness to a sheen throughout impacted area.
Groundwater - Sodium and Manganese	The entire area has been impacted, approximately 91,000 SF.	681,000 gallons	Assume 10' groundwater thickness impacted, assume sandstone bedrock porosity = 0.1.
Groundwater - Pesticides	Groundwater from two wells, MW-OU-1A-4 and MW-OU-1A-7 were impacted with pesticides; approximately 70,000 SF.	524,000 gallons	Assume 10' groundwater thickness and sandstone bedrock porosity = 0.1.
Groundwater - SVOC	Groundwater from well, MW-OU-1A-7 was impacted with SVOCs; approximately 45,000 SF.	337,000 gallons	Assume 10' groundwater thickness and sandstone bedrock porosity = 0.1.

TABLE 12 - BACKFILL CHEMICAL ANALYSIS FOR IMPORT
CONCORD HOTEL AND RESORT
TOWN OF THOMPSON, NEW YORK
NYSDEC BCP No. C353008
SESI CONSULTING ENGINEERS PROJECT # 7180

Volume in cubic yards (cy)	Sampling Frequency	Analytical Parameters
< 1,000	1 composite sample collected every 500 cy.	TCL (VOCs, SVOCs, Pesticides, PCBs, Cyanide, hexavalent chromium) and TAL Metals.
1,000 – 5,000	1 composite sample collected every 2,500 cy (if targeted analytes do not exceed Commercial and Protection of Groundwater SCOs in any of the samples associated with the first 1,000 cy from the same source). 1 composite sample collected every 1,000 cy (if targeted analytes exceed Commercial and Protection of Groundwater SCOs in any of the samples associated with the first 1,000 cy from the same source).	
> 5,000	1 composite sample collected every 5,000 cy (if targeted analytes do not exceed Commercial and Protection of Groundwater SCOs in any of the samples associated with the first 5,000 cy from the same source). 1 grab samples collected every 2,500 cy (if targeted analytes exceed Commercial and Protection of Groundwater SCOs in any of the samples associated with the first 5,000 cy from the same source).	

Notes: Each of the composite samples generated from five (5) grab samples