Comments On the Proposed Plan for Operable Unit 1 of the New Cassel/Hicksville Groundwater Contamination Superfund Site

Prepared for
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September 23, 2013

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Abbreviations

1,1-DCA	1,1-Dichloroethane
1,2-DCB	1,2-Dichlorobenzene
BGEWD	Bowling Green Estate Water District
CSM	Conceptual Site Model
CVOC	Chlorinated Volatile Organic Compound
D&B	Dvirka & Bartilucci Consulting Engineers
DCE	Dichloroethylene
DNAPL	Dense Non-aqueous Phase Liquid
RI/FS	Remedial Investigation/Feasibility Study
GI	General Instruments
HAS	Hollow Stem Auger
IMC	IMC Eastern Corporation
IRM	Interim Remedial Measure
MNA	Monitored Natural Attenuation
NAPL	Non-aqueous Phase Liquid
NCDH	Nassau County Department of Health
NCIA	New Cassel Industrial Area
NYSDEC	New York Department of Environmental Conservation
OU1	Operable Unit 1
PCE	Tetrachloroethene
PDI	Pre-design Investigation
PSA	Preliminary Site Assessment
RAO	Remedial Action Objective
RCRA	Resource Conservation and Recovery Act
RI	Remedial Investigation
ROD	Record of Decision
SCG	New York State Cleanup Goals for Groundwater
SVE/AS	Soil Vapor Extraction/Air Sparge
TCA	1,1,1-Trichloroethane
TCE	Trichloroethene
TMW	Temporary Monitoring Wells
UGA	Upper Glacial Aquifer
USEPA	United States Environmental Protection Agency
USGS	United States Geological Survey
VOC	Volatile Organic Compound

1 Introduction

On behalf of IMC Eastern Corporation f/k/a IMC Magnetics Corp. (IMC), Gradient submits the following comments regarding United States Environmental Protection Agency's (USEPA's) Proposed Plan for Operable Unit 1 (OU1) of the New Cassel/Hicksville Groundwater Contamination Superfund Site (Site; Figure 1.1), dated July 2013 [USEPA Region II, 2013a]. IMC is a former lessee of a facility located at 570 Main Street, Westbury, New York [NYSDEC, 2003]. That facility is located within an area known as the New Cassel Industrial Area (NCIA; Figure 1.2).

Our comments demonstrate that USEPA's Conceptual Site Model (CSM) is fundamentally flawed and does not correctly characterize groundwater contamination in OU1. The USEPA CSM:

- Does not consider a significant amount of data collected from within and upgradient of the NCIA and from within OU1, but instead relies on a relatively small and unrepresentative data set;
- Depicts a groundwater flow and plume migration direction that is incorrect and is not consistent with the conclusion reached by the New York Department of Environmental Conservation (NYSDEC);
- Relies on groundwater monitoring wells that are too shallow and hence fail to characterize a portion of the Eastern Plume that migrates deeper under the influence of the Bowling Green Estate Water District (BGEWD) pumping wells;
- Relies on an incorrect chlorinated ethenes molar ratio analysis approach – leading to unsupportable conclusions regarding plume chemical signatures;
- Utilizes unreliable data from temporary monitoring wells (TMWs) that were installed using inappropriate methods and are not reproducible; and
- Fails to consider that contamination originating from sites located upgradient of the NCIA (Upgradient Plume) is affecting groundwater quality within OU1 – a conclusion that has been acknowledged and documented by consultants working on behalf of the Upgradient Parties.

USEPA's CSM reaches conclusions regarding groundwater flow direction, plume fate and transport, and the source identification that are not supportable by sound science. In our comments, we discuss the shortcomings of the USEPA CSM and present a revised CSM, which demonstrates that:

- The NCIA Western Plume[1] was limited in spatial extent and attenuated to concentrations below the New York State Cleanup Goals for Groundwater (SCGs) before reaching Old Country Road;
- The plume depicted as the OU1 Western Plume in USEPA's Proposed Plan is the western extent of the comingled Central and Eastern Plumes;
- The NCIA Eastern Plume continues to contribute significant contaminant mass to OU1 and to affect groundwater quality within OU1; and

[1] Note, throughout this document we use the name of the operable unit together with the source area (*e.g.*, NCIA Eastern Plume and OU1 Eastern Plume) to denote the presence of a plume within a given area. That is, the term NCIA Eastern Plume refers to the Eastern Plume within the NCIA, whereas the term OU1 Eastern Plume refers to USEPA's depiction of the Eastern Plume within OU1.

- The Upgradient Plume continues to contribute contaminant mass to OU1 and to affect groundwater quality within OU1.

The remedy proposed by USEPA is also inappropriate since it relies on a flawed CSM, utilizes a remedial technology that NYSDEC previously rejected and has already been tried unsuccessfully just east of OU1, and is not-cost effective. Specific deficiencies of the proposed remedy include:

- The proposed remediation wells are not appropriately located since the USEPA conclusion regarding groundwater and contaminant migration direction are incorrect. This results in USEPA proposing wells in areas that have relatively low levels of contamination and a sub-optimal orientation of wells.
- One of the remedial technologies selected by USEPA, in-well stripping, was previously considered and rejected by NYSDEC due to the presence of anisotropies in the aquifer. The infeasibility of this approach at this Site has been corroborated by a failed attempt at using in-well stripping to remediate the Upgradient Plume, just east of OU1.
- The proposed remedy also places a disproportionately large number of remediation wells in the areas depicted by the USEPA as the OU1 Western and OU1 Central Plumes, with only a few wells in the Eastern Plume. As discussed in the revised CSM, the NCIA Eastern and Upgradient Plumes are continuing to contribute a significant amount of contaminant mass to OU1 and hence active remediation efforts at OU1 need to target the eastern portion of OU1.
- The remainder of the OU1 Plumes (Central and Western) have naturally attenuated over the years and are best addressed by Monitored Natural Attenuation (MNA). Given that potential groundwater exposures are being controlled by well head treatment at the BGEWD and by local institutional controls and the OU1 Central and Western Plumes attenuate, MNA is the most appropriate and cost-effective remedy for these portions of the Site.

In summary, the USEPA CSM is based on an incomplete and unrepresentative dataset, has significant inaccuracies (*e.g.*, the incorrect chlorinated ethane molar ratios), and reaches conclusions that are not based on sound science. The proposed remedial design suffers from the shortcomings of the CSM, utilizes a remedial technology that was not only rejected by NYSDEC but has also been tried unsuccessfully near OU1, and is not cost-effective. Given that exposure control measures are already in-place and the OU1 Central and Western Plumes attenuate, the eastern portion of OU1 is the only area requiring active remedial measures.

2 USEPA's CSM – the Basis for the Proposed Plan – is Fundamentally Flawed and Does Not Characterize Groundwater Contamination Correctly

USEPA's CSM relies on unrepresentative data collected from within OU1 and does not account for decades of environmental investigation-related data collected upgradient of OU1. In addition, the chlorinated ethenes molar ratio signature approach used by USEPA was inappropriately implemented. As a result, USEPA's conclusions regarding the groundwater flow direction, extent of plumes, and attribution of plumes to NCIA source areas is incorrect. As discussed in detail in this section, consideration of all available data within the NCIA and OU1, the temporal evolution of the NCIA-related plumes and the Upgradient Plume from the Sylvania and General Instruments (GI)/Vishay facilities, consideration of the correct groundwater flow direction and correctly undertaking the chlorinated ethenes molar ratio analysis leads to the following conclusions, which are completely different than those reached by USEPA:

- The NCIA Western Plume has always been limited in spatial extent and attenuates to concentrations below the SCGs before reaching Old Country Road;
- The plume depicted as the OU1 Western Plume in USEPA's Proposed Plan is the western extent of the comingled Central and Eastern Plumes;
- The NCIA Eastern Plume continues to contribute significant contaminant mass to OU1 and to affect groundwater quality within OU1; and
- The Upgradient Plume continues to contribute contaminant mass to OU1 and to affect groundwater quality within OU1.

These conclusions and their technical basis is presented and discussed in detail in the following sub-sections.

2.1 A Significant Amount of Critical Data Collected from Within the NCIA, Upgradient of the NCIA, and in OU1 Were Not Considered by USEPA in the Proposed Plan

Groundwater and soil data have been collected over a period greater than three decades in areas both within and upgradient of OU1. More than 7,400 soil and groundwater samples have been collected from over 1,100 locations within and adjacent to the NCIA, OU1, and the Upgradient Plume (Figure 2.1). Consideration of these data are crucial for understanding the source(s) of the current OU1 groundwater plumes and the fate of the plumes over time. Below is a summary of the key investigations that have been performed:

- *BGEWD Well Sampling:* Groundwater samples have been collected from the BGEWD pumping wells by the Nassau County Department of Health (NCDH) beginning at least as early as 1977 (NYSDEC, 2000). These samples provide an indication of timing and the nature of the

contamination reaching the BGEWD well, as well as the evolution of the groundwater plume in OU1.

- *United States Geological Survey (USGS)/NCDH Investigations:* Between 1983 and 1985, NCDH installed 30 monitoring wells within the NCIA, primarily in the Central and Western portions, six wells north (upgradient) of the NCIA, five wells within OU1, and three wells south or west of OU1 (NCDH and D&B, 1986). During this time period, a total of 128 groundwater samples were collected and analyzed (NYSDEC, 2000). Between 1986 and 1991, USGS installed 22 additional monitoring wells both *within and downgradi*ent of the NCIA; during this time period, more than 350 groundwater samples were collected and analyzed (USGS, 1996; NYSDEC, 2000).
- *NYSDEC Preliminary Site Assessments (PSAs):* Due to the detection of chlorinated volatile organic compounds (CVOCs) at the BGEWD pumping wells, NYSDEC performed a series of investigations to determine the source(s) of the groundwater contamination. As part of these PSAs, which were conducted between 1992 and 1997, a total of more than 900 groundwater and 250 soil samples were collected from sites within the NCIA (LMS, 1994, 1995, 1996, 1997).
- *Supplemental NCIA Investigations and Remedial Actions:* As a result of the PSAs, NYSDEC identified 17 Class 2 sites within the NCIA (NYSDEC, 2003). Soil and groundwater samples were collected at each site to characterize conditions, and to design, implement, and monitor remedial actions, as appropriate. In total, more than 1,700 groundwater samples and 300 soil samples were collected and analyzed between 1997 and 2010 during these remedial activities (Appendix A).
- *Upgradient Plume Investigations:* Between 1981 and 2010, over 2,300 soil and groundwater samples were also collected both on and downgradient of the Sylvania and GI/Vishay properties.
- *NCIA and Off-Site Groundwater Investigations:* Additional investigations were performed by NYSDEC within the NCIA and OU1 between 1999 and 2000 (LMS, 2000). Four shallow groundwater monitoring wells were installed and vertical profile data were collected from four hydropunch locations. In total, over 140 groundwater samples were collected and analyzed (LMS, 2000).
- *Additional Off-Site Groundwater Investigations:* Between 2008 and 2011, three different pre-design investigations (PDIs) were performed in the area downgradient of the NCIA. The first was performed by Dvirka & Bartilucci Consulting Engineers (D&B) in 2009 (D&B, 2009); the other two were performed by HDR in 2010 (HDR, 2010) and 2011 (HDR, 2011), respectively. In total, 30 monitoring wells were installed and more than 150 groundwater samples were collected and analyzed during this time period.

Appendix A lists all the studies that USEPA should have considered in the development of the CSM and the Proposed Plan. Despite the presence of a significant amount of data near and upgradient of OU1, USEPA has relied on a limited and unrepresentative dataset (see Section 2.4) in the development of its CSM for OU1 and the remedial actions specified in the Proposed Plan.[2] In summary, the data not considered by USEPA include, but are not limited to the following (Figure 2.1):

- Over 2,500 groundwater samples collected from locations within the NCIA;
- Over 150 groundwater samples collected from locations within OU1; and
- Over 2,500 groundwater samples collected from locations associated with the Upgradient Plume – including samples from within OU1.

[2] Figure 2 of the Proposed Plan presents the data that USEPA used to generate the depictions of the OU1 plumes, which forms the basis of their CSM.

These data are critical for understanding the location and characteristics of source(s) of plumes that originate from the NCIA and the upgradient parties, the chemical signature of the plumes at the source areas, and the fate and transport characteristics of these plumes as they migrate into OU1. As discussed in detail in Sections 2.5 through 2.7, one of the critical flaws in the USEPA analysis stems from inadequate examination of groundwater quality at the NCIA source areas.

2.2 Data from Temporary Monitoring Wells, Relied on by USEPA, Were Collected Using Inappropriate Methods and are Not Reproducible

A significant portion of the OU1 data, relied on by USEPA, were collected using inappropriate methods. Nine TMWs were installed in 2008 as part of a PDI conducted by D&B (2009; Figure 2.2). Seven of the nine temporary wells were installed and sampled inappropriately, causing cross-contamination between the shallow and deep groundwater samples. Furthermore, groundwater quality data from the TMWs are not reproducible. USEPA did not exercise sufficient care in the use of this data in the development of their CSM.

Seven TMWs (TMW-1, TMW-2, TMW-4, TMW-5, TMW-6, TMW-7, and TMW-9) were installed and sampled using inappropriate techniques. Each of these TMWs was drilled to 285 ft-below ground surface (ft-bgs) with a hollow stem auger (HSA). The use of HSAs for this type of well installation is inappropriate because soil and groundwater during drilling are transported up the auger flights; these drill cuttings contact the sides of the borehole as they are raised and, likely cause cross-contamination between different depth intervals. Technical literature, including regulatory guidance documents, warn about cross-contamination that may be caused by the drilling methods used by D&B:

- *Guidance Manual for Groundwater Investigations (CalEPA, 1995, p. 17):* "Because drill cuttings are in contact with the entire length of the borehole as they are transported up the auger flights, hollow-stem augers may cause cross-contamination of sub-surface materials."
- *Handbook of Environmental Site Characterization and Ground-Water Monitoring (Einarson, 2006. p. 834):* When using HSAs, "contaminants can be smeared against the borehole wall. This can impart a long-lived positive bias to groundwater samples collected from a multi-level well."

Furthermore, sampling at these seven TMWs was conducted contrary to USEPA-recommended sampling protocol; samples were first collected from the deeper sampling horizons that have higher levels of contamination, and then as each temporary well was raised, samples were collected from shallow, relatively clean groundwater. USEPA guidance (2002) recommends collecting samplings from the most impacted zones last, in order to minimize cross-contamination.

- *Ground-Water Sampling Guidelines for Superfund and Resource Conservation and Recovery Act (RCRA) Project Managers (USEPA, 2002, p. 11):* "The effects of cross-contamination can be minimized by sampling the least contaminated (zone) first and progressing to the more contaminated (zones)."

Groundwater quality data at these seven TMWs demonstrate that shallow groundwater was cross-contaminated due to the inappropriate sampling technique utilized. The downward flow gradient in the Magothy Aquifer carries plumes vertically downward with the groundwater (see Section 2.3), as they migrate laterally away from source area(s). Because the TMWs were installed generally at least several thousand feet from the NCIA source areas, groundwater impacts are at depth; shallow groundwater is

relatively unimpacted. However, at all seven of these TMW locations, shallow groundwater quality impacts were observed, contrary to demonstrated plume behavior. Groundwater quality impacts observed in shallow groundwater, defined as the 50 to 150 ft-bgs depth interval (roughly, the top 100 ft of the water column), are summarized below (Table 2.1; Figure 2.3 and 2.4).

Table 2.1 Impacts Observed in Shallow Groundwater at select TMW Wells[a]

Temporary Well ID	Maximum Detected Concentration in Shallow Groundwater (µg/L)	
	PCE	TCE
TMW-1	270	61
TMW-2	250	310
TMW-4	57	17
TMW-5	330	870
TMW-6	14	63
TMW-7	870	45
TMW-9	280	120

Notes:
(a) Shallow groundwater is defined as groundwater present from 50 to 150 ft-bgs.
PCE = Tetrachloroethene; TCE = Trichloroethene.

It is important to note that two other TMWs were installed during this investigation using a more appropriate method. TMW-3D and TMW-8D were installed to 500 ft-bgs using a mud rotary drill and groundwater samples were collected using a hydropunch at each sampling interval. Thus, at these locations, samples were collected first in shallow groundwater and then at deeper intervals as drilling progressed (*i.e.*, from the least-impacted zone to the most-impacted). Using this drilling and sampling approach, contamination was only found in deeper groundwater; no impacts were detected in the top 150 ft (approximately 100 ft below the water table) at TMW-3D or the top 250 ft (approximately 200 ft below the water table) at TMW-8D (Figures 2.3 and 2.4).

Groundwater samples collected from permanent monitoring wells confirm that the temporary monitoring wells data from TMW-1, TMW-2, TMW-4, TMW-5, TMW-6, TMW-7, and TMW-9 are unreliable. During the supplemental PDI performed in 2011 by HDR, permanent monitoring wells and extraction wells were installed adjacent to several of the prior temporary well locations. Monitoring wells MW-11S and MW-11D were installed adjacent to TMW-1; extraction well EX-2 was installed south of TMW-2 (Figure 2.2). Samples collected at the new permanent well locations from the same depth intervals contained significantly lower concentrations of key compounds [tetrachloroethene (PCE), trichloroethene (TCE), and 1,1,1-trichloroethane (TCA)], some by an order of magnitude, than were detected in the nearby TMWs in 2008 (Table 2.2). Data collected at the two permanent wells demonstrate the unreliability of the data collected at the inappropriately installed and sampled TMWs.

Table 2.2 Comparison of Data Collected at 2008 Temporary Wells and 2011 Permanent Wells

Well ID	TMW-2	EX-2
Date	8/18/2008	4/12/2011
Sample Depth (ft-bgs)	285	285
PCE (µg/L)	390	130
TCA (µg/L)	3.4	ND
TCE (µg/L)	1,400	140

Well ID	TMW-1	MW-11S	TMW-1	MW-11D
Date	8/27/2008	4/4/2011	8/26/2008	4/4/2011
Sample Depth (ft-bgs)	225	225	285	285
PCE (µg/L)	3,700	140	530	460
TCA (µg/L)	21	3.8	18	10
TCE (µg/L)	230	190	650	400

Notes:
ND = Not Detected; PCE = Tetrachloroethene; TCE = Trichloroethene; TCA = 1,1,1-Trichloroethane.

USEPA acknowledged in the Supplemental Feasibility Study (USEPA Region II, 2013a) that "there is greater uncertainty with the groundwater sampling data collected from the temporary well locations relative to the permanent monitoring locations." This uncertainty is magnified by the inability to reproduce the sample results collected from the temporary wells and the likely cross-contamination that has impacted the shallow groundwater data at seven of the TMW locations. Nonetheless, because the TMWs were installed in useful locations and span important depths intervals, we believe that the TMW data can be used, albeit judiciously, to delineate groundwater plumes in OU1. However, the conclusion that shallow groundwater is contaminated in this area is unfounded.

2.3 The Groundwater Flow and Plume Direction Portrayed in the Proposed Plan is Incorrect and Inconsistent with Measured Groundwater Elevations

The groundwater flow direction and the resulting plume transport direction depicted by USEPA in the Proposed Plan are incorrect. The Plan shows the groundwater flow direction (Figure 2; USEPA Region II, 2013a) and all OU1 plumes migrating primarily to the south. This portrayal is inconsistent with historic groundwater elevation data collected within OU1 that clearly indicate groundwater flow direction to the southwest. This conclusion has been confirmed in a number of reports produced by the NYSDEC and its consultants:

- *Remedial Investigation (RI)/Feasibility Report (LMS, 2000):* "Following NYSDEC and USEPA regulations, both the [Upper Glacial Aquifer] UGA and Magothy are protected as sole source aquifers on Long Island. Depth to water is about 50 to 55 ft below the ground surface in the study area and the hydraulic gradient is approximately 0.0006 ft/ft to the southwest."
- *Record of Decision (ROD; NYSDEC, 2003):* "The UGA and the Magothy are in direct hydraulic connection; however, clay lenses are often found in the upper Magothy in this area. Depth of water table is between 55-65 ft-bgs in the NCIA, and groundwater flows in a southwesterly direction."
- *PDI Report (D&B, 2009):* "The NCIA topography is generally flat. Three commingled volatile organic compound (VOC) plumes are located in this area and are migrating in the direction of regional groundwater flow, which is roughly to the southwest."

The direction of plume transport depicted in technical reports prepared by NYSDEC corroborate the southwesterly groundwater flow direction. In addition, plume maps presented in the 2003 ROD issued by NYSDEC (2003) [reproduced in Figure 2.5], indicate that NCIA-related plumes migrate to the southwest. The ROD (NYSDEC, 2003) states that "the axis of the plume is generally in the direction of the flow of shallow groundwater."

Recent groundwater elevation data confirm the southwesterly groundwater flow direction (Figures 2.6a and 2.6b). Groundwater elevations in the UGA, presented in the 2000 Remedial Investigation/Feasibility Study (RI/FS) (LMS, 2000) indicate that the shallow groundwater flows to the southwest (Figure 2.6a). In the 2011 PDI (HDR, 2011), HDR installed 11 additional monitoring wells in the OU1 Magothy and measured groundwater elevations in both new and existing wells (Figure 2.2). Several of the new wells (MW-11S/D, MW-16S/D, and MW-17S/D) were couplets where adjacent shallow and deep monitoring wells were installed. Thus, elevation data from these wells provide further corroboration of the flow directions within the Magothy Aquifer and also provide a more robust dataset for evaluating the vertical flow gradient within OU1. The results of the HDR monitoring confirm that shallow groundwater (130-140 ft-bgs) flows to the southwest (Figure 2.6b). Furthermore, at mid-aquifer depth (205 ft-bgs), the groundwater flow direction has a much stronger westerly flow component (Figure 2.6b).[3]

Our conclusion that the groundwater flow direction in OU1 is toward the southwest is not only consistent with the conclusion reached by NYSDEC, but is also supported by the OU1 groundwater quality data. As discussed in detail in Sections 2.5 through 2.7, TCA and its degradation products are marker compounds for the NCIA's Central Plume.[4] The spatial orientation of the TCA and its degradation products plume (Figures 2.18c, 2.19c, and 2.20c), including the sharp westerly transport of these compounds within OU1, further corroborates the groundwater flow direction. The HDR groundwater elevation data and groundwater quality data (discussed further in Sections 2.5 through 2.7) also indicate that there is a groundwater flow divide in the eastern portion of OU1 (Figure 2.6). Groundwater quality data indicate that the NCIA Eastern Plume is being split with contaminant mass flowing both to the south and the southwest, as a result of the flow divide.

The groundwater elevation data collected at the monitoring well couplets also indicate the presence of downward vertical gradients in OU1. As expected, there is a larger downward vertical gradient near the BGEWD water supply wells (0.0064 to 0.0078 ft/ft; Table 2.3), whereas the downward vertical gradient is smaller in the western portion of OU1 (0.0017 ft/ft; Table 2.3). These vertical gradient values indicate that as the NCIA-related plumes migrate laterally, they also sink downward. In addition, given the groundwater flow direction and the influence of the BGEWD pumping wells, groundwater plumes in the eastern portion of OU1 are expected to descend more rapidly than those in the western portion. Additionally, while the plumes are sinking, they are simultaneously influenced by the strong westerly groundwater flow component.

[3] Note, the groundwater elevation contours at a depth of 285 ft-bgs depicted in HDR (2011) appear to be affected by a precipitation event that occurred on 4/16/2011 (1.38 inches); an examination of groundwater elevation data collected prior to this precipitation event (*e.g.*, April 15, 2011) indicate a stronger westerly flow component, similar to that depicted on Figure 9 of the HDR report.

[4] Note, TCA and its degradation products were also detected in the Eastern and Western Plumes within the NCIA, but these concentrations were relatively low, hence enabling the use of TCA as a NCIA Central Plume marker compound.

Table 2.3 OU1 Summary of Vertical Hydraulic Gradients

Monitoring Well Couplet	Downward Vertical Hydraulic Gradient (ft/ft)	Notes
MW-11S/D	0.0017	Based on 1 measurement on 4/25/2011 (HDR, 2011)
MW-16S/D	0.0078	Based on 2 measurements on 4/14/2011 and 4/25/2011 (HDR, 2011)
MW-17S/D	0.0064	Based on 2 measurements on 4/13/2011 and 4/25/2011 (HDR, 2011)

In summary, an accurate assessment of the spatial and vertical variability of the groundwater hydraulics is essential for properly designing any groundwater remediation system. The differences between the groundwater flow direction depicted by USEPA and the correct flow direction are significant since they have a profound effect on interpreting groundwater quality data, development of an accurate CSM, and the Site's remedial design. Consequences of failing to correctly consider the OU1 groundwater flow hydraulics are incorrect plume depictions, incorrect source attributions, and a flawed proposed remedy design.

2.4 Key Data, Relied on by USEPA, Fail to Correctly Delineate OU1 Plumes Because Monitoring Wells were Installed Too Shallow

Data relied upon by USEPA in the Proposed Plan were collected from wells that are too shallow to delineate the extents of the OU1 plumes. As discussed in Section 2.3, a downward vertical flow gradient causes plumes to sink as they migrate through OU1 away from the source area(s). However, key OU1 monitoring wells are screened in the zone of relatively unimpacted groundwater above the plume, and consequently these data are not adequate for delineating the plumes.

An example of a well couplet that is too shallow to adequately delineate groundwater impacts is MW-16S/D. This couplet was installed by HDR (2011) immediately adjacent to the location where TMW-8D was installed in 2008 (D&B, 2009). MW-16S was installed with a well screen from 215 to 225 ft-bgs; MW-16D was installed with a well screen from 275 to 285 ft-bgs. Yet, the plume had already been delineated at TMW-8D to be present at depths ranging from 292 to 372 ft-bgs, with the maximum concentration being present at a depth of 337 ft-bgs. Thus, MW-16S or MW-16D were installed at depth intervals where prior groundwater vertical profiling had found concentrations to be either non-detect or well below New York SCGs. Therefore, the decision to install this monitoring well cluster at these depths is truly perplexing. Furthermore, USEPA's decision to ignore the groundwater quality data at TMW-8D in the development of its CSM and for delineating OU1 plumes (Figure 2 of the Proposed Plan) is also inexplicable.

Other key wells in OU1 screened at depths that are also too shallow to delineate the plume include:

- MW-15: Well screen installed from 185-205 ft-bgs; and

  GWHP-2: Samples collected from 58-150 ft-bgs.

USEPA used these shallow monitoring well data to incorrectly dismiss the southwest flow component of the NCIA Eastern Plume. As a consequence, the USEPA CSM is flawed and incomplete because it is based on unrepresentative data and fails to reconcile available information.

2.5 USEPA's Chlorinated Ethenes Molar Ratio Analyses and Plume Fingerprinting are Incorrect

The molar ratio analysis presented in the Supplemental RI Technical Memorandum (Bolduc, 2013) and relied on by USEPA in its Proposed Plan is incorrect. The RI molar ratio analysis assumes that all dichloroethylene (DCE) isomers (cis-1,2-DCE, trans-1,2-DCE, and 1,1-DCE) are degradation products of the higher molecular weight chlorinated ethenes (PCE and TCE). While cis-1,2-DCE is the predominant dichloroethylene isomer formed during the degradation of PCE and TCE, the 1,1-DCE isomer is formed by the abiotic hydrolysis of TCA (Wiedemeier *et al.*, 1999). Thus, the RI molar ratio analysis presented by USEPA mischaracterizes the breakdown pathways and does not allow for the differentiation between the degradation products in PCE/TCE and TCA plumes. Because TCA and its daughter products are indicators of the Central Plume, correctly depicting the chlorinated PCE/TCE and TCA degradation chains is essential for delineating the spatial extents of the OU1 plumes and for appropriately assigning plumes to source areas.

The sequence of microbially mediated and abiotic reactions that degrade PCE/TCE and TCA to non-chlorinated reaction products is well established. PCE/TCE degradation occurs *via* microbially mediated reactions, leading to a series of breakdown (or daughter) products, as shown in Figure 2.7. Although degradation of TCE can produce all three isomers of DCE (cis-1,2-DCE, trans-1,2-DCE, and 1,1-DCE), it is well documented that cis-1,2-DCE is by far the dominant breakdown product and 1,1-DCE is comparatively insignificant (Wiedemeier *et al.*, 1999). Degradation of TCA can occur *via* microbial degradation to 1,1-dichloroethane (1,1-DCA) and by abiotic hydrolysis of the parent compound to either 1,1-DCE or acetate (Figure 2.7). Approximately 20% of the TCA hydrolysis products are 1,1-DCE, which is the most likely source of 1,1-DCE in contaminated groundwater (McCarty, 1997). Therefore, when evaluating molar ratios of parent to daughter compounds, 1,1-DCE is a significant breakdown product of TCA and not of PCE/TCE and is a marker of the NCIA and OU1 Central Plumes.

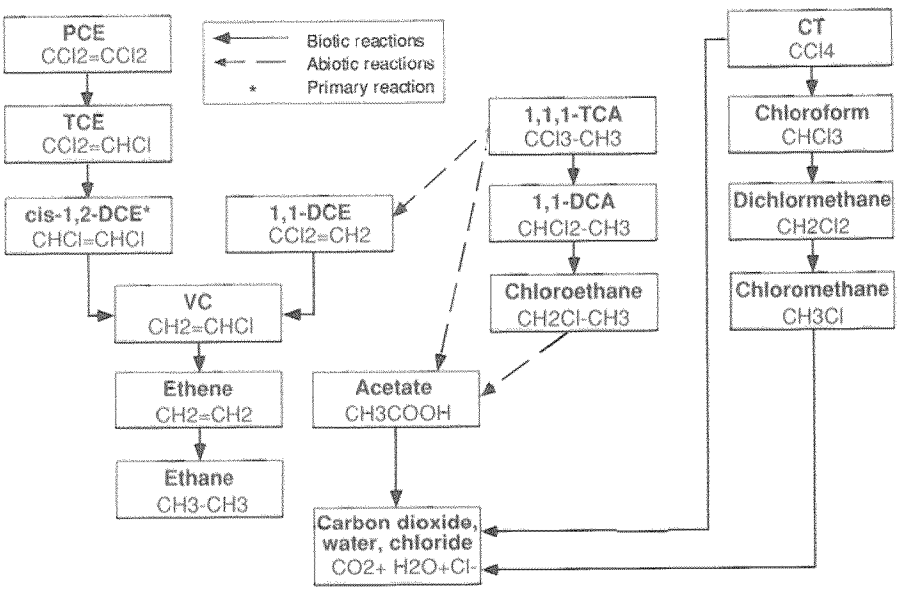

Figure 2.7 Degradation Pathways for Chlorinated Ethenes, Ethanes, and Methanes (From Wiedemeier *et al.*, 1999)

USEPA's incorrect molar ratio analysis leads to a mischaracterization of the spatial extents of the OU1 plumes and to incorrect attribution of plumes to source areas. We reevaluated the molar analysis using the correct degradation pathways. For the chlorinated ethenes, we have analyzed the molar fractions of PCE, TCE, cis-12-DCE, and vinyl chloride in OU1 monitoring wells (Figure 2.8). For the TCA degradation chain, we have analyzed the molar fractions of TCA, 1,1-DCE, and 1,1-DCA (Figure 2.9). Conclusions drawn from this corrected analysis, summarized below, differ significantly from those presented in the RI.

- Monitoring wells located downgradient of the NCIA Central Plume (TMW-6, MW-5/6, TMW-5, MW-1, MW-2/3/4, MW-10, GWHP-1, MW-3, MW-4, TMW-3D, and TMW-2; Figure 2.9) contain high mole fractions of TCA degradation products (1,1-DCE and 1,1-DCA). At these wells, 1,1-DCE mole fractions range up to 71% of the total TCA degradation chain; 1,1-DCA mole fractions range up to 45%. These monitoring wells delineate the Central Plume flow path through OU1.
- PCE and TCE are the two primary chlorinated ethenes detected in OU1 (Figure 2.8).
  - High PCE mole fractions, ranging up to 98% of the total chlorinated ethenes, have been detected in wells located downgradient of the NCIA Eastern Plume (FSMW-14A/B, FSMW-13A/B, TMW-7, MW-14, EW-1B, and EX-1).
  - High TCE mole fractions, ranging up to 90% of the total chlorinated ethenes, have been detected in wells located downgradient of the NCIA Central Plume. Monitoring wells with high TCE mole fractions are the same wells where high 1,1-DCE and 1,1-DCA molar concentrations (compounds that are indicators of the Central Plume) have been found.
  - PCE and TCE are both present in the western portion of OU1, which is caused by the mixing of the OU1 Eastern and OU1 Central Plumes.
- Cis-1,2-DCE is not a significant component of the total chlorinated ethenes in OU1 (Figure 2.8). On average throughout OU1, cis-12-DCE makes up about 14% of the total chlorinated ethene molar concentrations in OU1.[5]

The TCE signature that USEPA attributed to the OU1 Western Plume is incorrect. USEPA states in the Proposed Plan that "The Western Plume has a generally higher molar fraction of TCE compared to PCE" (USEPA Region II, 2013a). However, a review of groundwater quality data at the NCIA source areas demonstrates that PCE and <u>not</u> TCE is the predominant chlorinated ethene associated with NCIA Western Plume. To define the NCIA source area chlorinated ethene plume signature, we utilized all groundwater samples in which either the PCE or TCE concentration exceeded 1,000 µg/L. Additionally, because cis-12-DCE has only been detected at relatively low concentrations, we utilized the ratio of PCE to TCE to delineate plumes within OU1.

The revised molar ratio analysis indicates that PCE is the predominant compound in both the Eastern and Western NCIA source areas. However, in the Eastern NCIA source area, the PCE to TCE molar ratio is approximately 10 times higher than the average molar ratio for the Western NCIA source area (*i.e.*, 51 *vs.* 5; Table 2.4). The high molar ratio in the Eastern NCIA source area is due to the presence of PCE dense non-aqueous phase liquid (DNAPL) (discussed in Section 2.7.2). In the Central Plume, the average PCE to TCE ratio is 0.07 (Table 2.4); molar ratios less than 1 indicate that TCE is present at higher concentrations than PCE. The low PCE to TCE molar ratios within the NCIA Central Plume are likely associated with the known historical use of TCE at two of the Central Plume sites (LMS, 1995, 1996; Anson, 1994).

[5] Based on all data shown on Figure 2.8.

Table 2.4 PCE to TCE Molar Ratios Within the NCIA Source Areas

Source Area	Average PCE to TCE Molar Ratio
Eastern NCIA	51
Central NCIA	0.07
Western NCIA	5

Note:
NCIA = New Cassel Industrial Area.

The revised molar ratio analysis for OU1 also demonstrates that monitoring wells downgradient of the Central Plume (TMW-6, EW-2B, TMW-5, MW-2, MW-3, MW-4, and TMW-2) contain higher concentrations of TCE than PCE (*i.e.*, the PCE to TCE molar ratio of less than 1), which are consistent with the NCIA Central Plume signature (Figure 2.10). High PCE to TCE molar ratios are located along the Eastern Plume flow path at the Frost Street Sites, TMW-7, TMW-8D, and at TMW-1 (Figure 2.10). As distance from the Eastern NCIA source area increases, the PCE to TCE molar ratio declines due to attenuation of the PCE plume and commingling of the Eastern Plume (high PCE molar fraction) with the Central Plume (high TCE molar fraction).

2.6 USEPA Has Not Considered Contributions from the Upgradient Plume which is Migrating into OU1 and Affecting Groundwater Quality

The Upgradient Plume results from multiple source areas present at two industrial facilities: Sylvania and GI/Vishay, located northeast of the NCIA. Environmental investigations have been undertaken at these Sites since the 1980s with oversight from county, state, and federal authorities (Bolduc, 2013). Historical chlorinated solvent usage at both sites was similar to the industrial facilities located within the NCIA. Elevated PCE and/or TCE concentrations in groundwater, consistent with the presence of non-aqueous phase liquid (NAPL), have been found at the Sylvania and GI/Vishay Sites. PCE concentrations up to 32,000 µg/L (P-108, 74 ft-bgs; Bolduc, 2013) have been detected at the Sylvania facility, and TCE has been detected at concentrations up to 48,000 µg/L (W-1-75, 65-75 ft-bgs; ESC, 2006) at the GI/Vishay facility.

The chlorinated VOC plume from the Sylvania and GI/Vishay facilities migrates in a southwesterly direction into the NCIA and OU1. The conclusion that the Sylvania and GI/Vishay chlorinated organics plume has entered and is affecting groundwater quality in the NCIA and OU1 is supported by multiple lines of evidence:

- 1,2-Dichlorobenzene (1,2-DCB) is a distinct marker of the Upgradient Plume, uniquely associated with the GI/Vishay facility (WSP, 2010), and is found within the NCIA. In addition, 1,2-DCB is not known to have been used at any of the NCIA facilities. GI/Vishay acknowledged that 1,2-DCB was a unique marker of their operations and used this compound to delineate the approximate extent of their VOC plume (WSP, 2010).[6] Groundwater quality data collected as part of this investigation found 1,2-DCB to be present at depths ranging from 240 ft-bgs to 418 ft-bgs within and just east of the NCIA (WP-01 and WP-02 and WP-03) (Figure 2.11 and Table 2.5).

[6] Note, the plume defined on the basis of 1,2-DCB provides an approximate delineation of the VOC plume due to differences in migration rates between 1,2-DCB and PCE/TCE. As acknowledged by GI/Vishay's consultant, PCE and TCE are expected to result in a larger plume than 1,2-DCB, since their migration rate in groundwater is faster than 1,2-DCB (Appendix E; WSP, 2010).

Table 2.5 Upgradient Plume Impacts Using 1,2-DCB as a Marker Compound

Depth Profile ID	Location	Depth Interval Associated with Upgradient Plume - based on 1,2-DCB presence (ft-bgs)	Range of PCE Concentrations in Upgradient Plume Depth Interval (µg/L)	Range of TCE Concentrations in Upgradient Plume Depth Interval (µg/L)	Range of Cis-1,2-DCE Concentrations in Upgradient Plume Depth Interval (µg/L)
WP-01	NCIA	285-366	ND-500	490-3,700	70-1,500
WP-02	East of NCIA	240-378	39-490	210-550	27-1,900
WP-03	East of NCIA	276-418	0.4-160	2.6-1,400	0.6-1,100

Note:
ND = Not Detected; 1,2-DCB = 1,2-Dichlorobenzene; PCE = Tetrachloroethene; TCE = Trichloroethene; cis-1,2-DCE = cis-1,2-Dichloroethylene; NCIA = New Cassel Industrial Area.

- Elevated concentrations of PCE, TCE, and cis-1,2-DCE associated with the Upgradient Plume and distinct from the Frost Street Sites were also found at other locations, WP-06 and WP-07 (Figure 2.12). These chlorinated ethenes represent an additional source of contamination to OU1 because:
  - The chlorinated ethenes groundwater contamination related to the Frost Street Sites at the NCIA is relatively shallow (50 to 150 ft-bgs), whereas the Upgradient Plume enters the NCIA and OU1 at much deeper depths, ranging from 200 to 430 ft-bgs. For example, at WP-07, contamination associated with the Frost Street Sites is located at approximately 50 to 100 ft-bgs, whereas the Upgradient Plume is located at approximately 260 to 430 ft-bgs (Figure 2.12). Overall, the Upgradient Plume continues to sink as it migrates towards the southwest and is present at significant depths within the NCIA and OU1. The migration of the Upgradient Plume from the source areas into the NCIA and OU1 is clearly depicted on Figure 2.13.
  - In addition to the difference in contamination depths, the chemical signature (chlorinated ethene molar ratios) of the Upgradient Plume is different than the signature associated with the groundwater contamination at the Frost Street Sites within the NCIA. As previously discussed (Section 2.5), the NCIA Eastern Plume is PCE enriched (with PCE to TCE ratios typically on the order of 50), whereas the Upgradient Plume that is entering the NCIA and OU1 is a mix of TCE, PCE, and Cis-1,2-DCE. For example, this difference in chemical signatures can clearly be observed at WP-07 (Figure 2.12).
- Finally, groundwater and contaminant transport modeling undertaken by GI/Vishay also demonstrates that the Upgradient Plume is migrating into the NCIA and OU1. GI/Vishay used the measured concentrations for 1,2-DCB, a GI/Vishay marker compound (Table 2.5), to first calibrate a contaminant transport model, which was then used to estimate the downgradient extent of the PCE and TCE plumes associated with <u>just</u> the GI/Vishay facility (WSP, 2010). Note, the model-estimated plume extents were to be used to guide the placement of future monitoring wells – an effort that was abandoned once NYSDEC decided to refer the groundwater contamination sites in this area to the USEPA for potential placement on the National Priorities List. Regardless, the GI/Vishay model-predicted plumes for PCE and TCE, attributable <u>just to the GI/Vishay sources</u> extend a considerable distance (up to 1,600 feet) into OU1 (Figures 2.14 and 2.15). The full down-gradient extents of these model-predicted plumes have not been corroborated by the additional sampling originally contemplated by NYSDEC and GI/Vishay.

In summary, groundwater quality data demonstrate the presence of a marker compound (1,2-DCB) uniquely associated with the Upgradient Plume within the NCIA, presence of elevated PCE, TCE and degradation products co-located with the 1,2-DCB, clear differences in depth and chemical signature

between the Upgradient Plume and the NCIA Frost Street/Eastern Plume, and modeling results generated by a consultant working on behalf of one the Upgradient Parties demonstrating that the Upgradient Plume is entering OU1. Overall, there is compelling evidence demonstrating that the Upgradient Plume is affecting groundwater quality in OU1, the full extent of which has not yet been determined. Consequently, USEPA needs to revise their CSM and proposed remediation plan to address the contributions from the Upgradient Plume.

2.7 The Correct CSM Demonstrates that the NCIA Eastern and Central Plume Sources and the Upgradient Plume are Resulting in the Groundwater Contamination Observed in OU1

The CSM, which is the basis of USEPA's Proposed Plan, is fundamentally flawed in multiple facets. The Plan does not consider decades of environmental data collected within the NCIA and the Upgradient Plume – critical for defining source area plume characteristics. USEPA's failure to consider valuable source chemistry data, together with an incorrect characterization of groundwater flow direction and misinterpretation of the chlorinated organics degradation chains (and incorrect molar ratio calculations) results in OU1 plume depictions that are not supported by sound science. The failure of the USEPA CSM to accurately depict Site conditions is best illustrated by the CSM's inability:

- To acknowledge that the BGEWD wells are contaminated or explain the sources that are affecting groundwater quality at these production wells. In fact, according to the USEPA proposed CSM, the CVOCs plume does not reach the BGEWD wells, while in reality CVOCs have been detected at the BGEWD wells since 1983, and total CVOC concentrations have exceeded 100 µg/l (USEPA's threshold concentration for depicting plumes on Figure 2 of the Proposed Plan) since at least 2003 (Figures 2.16 and 2.17).
- To account for the presence of elevated levels of CVOCs at TMW-8D in the depiction of OU1 plumes (Figure 2 of Proposal Plan). Groundwater quality data from this location clearly demonstrates that the NCIA Eastern Plume migrates in a southwesterly direction. However, USEPA in drawing its plumes ignores these data completely and apparently relies on wells MW-16S/D, which are too shallow (Section 2.4).

The correct CSM, which rectifies the USEPA deficiencies, demonstrates that the NCIA Eastern and Central Plumes and the Upgradient Plume are the source(s) of the contamination reaching the BGEWD wells and causing the groundwater contamination observed within OU1. The correct CSM also demonstrates that the NCIA Western Plume is currently contained entirely within the NCIA, was limited in extent, and has never impacted the BGEWD water supply wells (Section 2.7.4). A key component of our analysis was understanding the temporal and spatial evolution of plumes at the NCIA source areas and in OU1. Since investigations at the NCIA, OU1, and at the Upgradient Plume were conducted over a prolonged period and were undertaken by separate entities, we combined the datasets into the following three time intervals to draw plume maps:

- *1994 to 1998:* This interval corresponds to the time during which a significant amount of data was collected during the PSAs within the NCIA (Figures 2.18a through 2.18c).
- *1999 to 2007:* During this time period, NYSDEC-required remedial actions were being implemented at most of the NCIA source area properties. Furthermore, plumes were delineated to a greater extent in OU1 and downgradient of GI/Vishay and Sylvania (Figures 2.19a through 2.19c).

- *2008 to 2011:* This time interval includes the relatively recent data and is the best representation of current conditions at OU1 and its vicinity (Figures 2.20a through 2.20c). However, as discussed in Section 2.2, concentrations recorded in the monitoring wells installed as part of the HDR PDI (HDR, 2011) study indicate much lower concentrations in the vicinity of some of the TMW locations (sampled in 2008). Hence, the plume maps for this time period, which include the TMW data, may overstate the extent of current contamination in OU1.

Using these plume maps together with other information, such as source area characterization and remediation data at the NCIA and areas associated with the Upgradient Plume, the revised molar ratio analyses (Section 2.5), and the area's hydrogeologic characteristics, the following subsections present a revised CSM for the Upgradient Plume, the NCIA Eastern Plume, the NCIA Central Plume, and the NCIA Western Plume.

2.7.1 Upgradient Plume

The Upgradient Plume, which originates at the GI/Vishay and Sylvania properties northeast of the NCIA, is a comingled PCE, TCE, and cis-1,2-DCE plume. TCE is the predominant compound associated with the GI/Vishay facility, whereas PCE is the key compound related to the Sylvania facility. However, given the close proximity of the two facilities, these plumes comingle and then migrate in a south-southwesterly direction (Figures 2.18a, 2.18b, 2.19a, 2.19b, 2.20a, and 2.20b). As discussed in Section 2.6, concentrations indicative of NAPL are present at the source area(s). In the vicinity of the source area(s), the CVOC plume is found at relatively shallow depths (60 to 120 ft-bgs); however, as the plume migrates laterally, it also moves vertically downward (Figure 2.13).

An interim remedial measure (IRM) was installed in 2003 to control CVOC migration downgradient from the GI/Vishay facility. Three in-well vapor stripping wells were installed to depth of 392 ft-bgs (ESC, 2004). Between 2003 and 2009, the IRM treated approximately 224 million gallons of groundwater and removed more than 2,500 lbs of VOCs (Sobieraj, 2009). However, groundwater impacts were far wider and deeper than initially thought and, consequently, the IRM was not capable of achieving its objective of controlling CVOC migration (Sobieraj, 2009). Thus, operation of the IRM was terminated in 2009.

A component of the Upgradient Plume flows into the NCIA and OU1. The Upgradient Plume is rich in TCE and cis-1,2-DCE (with lower relative PCE concentrations) when it enters the NCIA and OU1 (sampling locations WP-07, WP-06, and WP-01; Figure 2.12). This chemical signature (low PCE to TCE molar ratio), which is very distinct from the NCIA Eastern Plume signature, and the depth at which the plume enters (200 to 430 ft-bgs) allows it to be clearly differentiated from the shallower NCIA Eastern Plume. Consistent with the GI/Vishay PCE and TCE solute transport modeling results, groundwater quality data collected within OU1 confirm that the Upgradient Plume has entered OU1. For example, the low PCE to TCE ratio associated with the Upgradient Plume is clearly visible at deeper depth horizons, such as depth intervals greater than and equal to 437 ft-bgs at TMW-8D. In fact, at this location, there appears to be a distinct "clean" horizon (all CVOCs <5 µg/l at 392 ft-bgs) separating the Upgradient Plume from the overlying NCIA Eastern Plume (see Figure 4-1; D&B, 2009).

Overall, based on the preceding analysis, we conclude that the Upgradient Plume has reached OU1. USEPA needs to update their CSM to include the Upgradient Plume.

2.7.2 NCIA Eastern Plume

The NCIA Eastern Plume is the most significant source of CVOCs to OU1 and accounts for a vast majority of the contaminant mass present in OU1. The plume is predominantly PCE at the source area(s), with a PCE to TCE molar ratio of approximately 50 (Table 2.4). PCE concentrations as high as 120,000 µg/l (>50% of the aqueous solubility limit of PCE) have been detected in the NCIA Eastern Plume (FSMW-4A). PCE concentrations exceed 1% of its aqueous solubility (a threshold for potential NAPL presence (USEPA, 1992; Cohen & Mercer, 1993) over an area of approximately 160,000 ft^2 (~3.7 acres). The large aerial extent and high PCE concentrations within the NCIA Eastern Plume source area are visible in the plume maps for all the three time intervals (Figures 2.18a, 2.19a, and 2.20a). In addition, PCE concentrations exceeding the NAPL threshold extend to approximately 140 ft-bgs, indicating that DNAPL has penetrated to approximately 90 ft below the water table surface at the NCIA Eastern Plume source area (Figure 2.21 and 2.22). High concentrations of TCE have also been detected (*e.g.*, 5,900 µg/L at GP-72, 83-85 ft-bgs; 5,000 µg/L at GP-97, 83-85 ft-bgs; NYSDEC, 2000) in the Eastern Plume source areas (Figures 2.18b, 2.19b, and 2.20b).

Groundwater remediation at the NCIA Eastern Plume source(s) has had a limited effect on restoring groundwater quality and limiting contaminant migration into OU1. Remedial measures were not implemented at the Frost Street Sites until 2005 (Heaney, 2010), whereas remediation at most other Sites within the NCIA started in the 1990s and had largely completed NYSDEC requirements by the mid-2000s. Furthermore, the remedial measures implemented to-date at the Frost Street Sites appear to have had a limited beneficial impact on groundwater quality, with concentrations at a number of monitoring wells within the source area still exceeding 10,000 µg/l (Figure 2.20a). A letter from Walden Associates (a consultant for the Frost Street Sites) to NYSDEC (Heaney, 2010) summarizes the ineffectiveness of the soil vapor extraction/air sparge (SVE/AS) system installed at the Frost Street Sites:

> Although the *SVE/AS* system has been effective in the areas of FSMW-8A and FSMW-9A, unchanged groundwater concentrations were observed at monitoring well FSMW-4A after nearly three and a half (3.5) years *of SVE/AS* remedial system operation. Walden conducted three Geoprobe® investigations in 2009 to locate groundwater and soil hot spots potentially contributing to FSMW-4A groundwater contaminant concentrations and to delineate the 89 Frost Street suspected source area, as summarized in the Work Plan. Results of these investigations detected high soil concentrations of 3,200,000 ug/kg in one area located upgradient of FSMW-4A (in the vicinity of sampling location GWP-4 shown on Figure 3 of the Work Plan). This location also appears to correlate with the location of a former septic system structure. Additionally, a clay interval with varying thickness was encountered between 45 and 50 feet below grade (bg) in each boring installed in the vicinity of GWP-4. The extent of this clay has not been delineated, but it is suspected to have acted as a partial confining layer, that, at its edges, has provided a continuing source of soil contamination to the groundwater in this area.

Due to the ineffectiveness of the remedy to address the contaminant mass present at Eastern Plume source areas, significant contaminant mass continues to migrate *via* the Eastern Plume into OU1. This can be observed on the PCE plume maps (Figures 2.18a, 2.19a, 2.20a, and 2.21) that consistently show elevated PCE concentrations (on the order of 1,000 µg/l or higher) entering OU1, immediately downgradient of the Eastern Plume source area (Figures 2.18a, 2.19a, 2.20a, and 2.21). Using groundwater quality data collected near the Eastern Plume NCIA/OU1 boundary between 2000 and 2011, we have estimated that as much as 750 kgs/yr of total CVOC mass migrates from the Eastern Plume source areas into OU1.[7]

[7] Mass flux calculations based on data from monitoring wells FSMW-5, FSMW-17, FSMW-14, FSMW-13, FSMW-11, FSMW-6, FS-B4, FS-B5, FS-B6, FS-B7, FS-B8, FS-B9, FS-UVB-1, FS-UVB-2, FSMW-18, FSMW-16, and FSMW-12; the hydraulic

A portion of the NCIA Eastern Plume migrates to the southwest, affecting groundwater quality at the BGEWD wells and downgradient areas. A groundwater flow divide is present in OU1 immediately downgradient of the southeastern section of the NCIA (Figure 2.6 and Section 2.3). Consequently, a portion of the NCIA Eastern Plume migrates to the southwest and a portion migrates to the south (toward TMW-7 and MW-17D). USEPA's CSM acknowledges the southern component of the Eastern Plume but has ignored the component that migrates to the southwest. The southwest component of the plume is defined by TMW-8D, TMW-5, and other downgradient locations, where the plume becomes comingled with the Central Plume (*e.g.*, TMW-3D and TMW-2).[8] The contributions of the Central Plume at these comingled locations are discernible due to the presence of TCA and its breakdown products (discussed further in Sections 2.7.3 and 2.5).

The NCIA Eastern Plume's chlorinated ethene molar signature (high PCE to TCE ratio) helps track its progression across OU1. As demonstrated on Figure 2.10, the high PCE to TCE ratios can be observed at the Frost Street Site, TMW-7, TMW-8D, and at TMW-1. At these locations, the PCE to TCE ratios are generally on the order of 10 or higher, especially in the depth intervals where high concentrations have been observed.[9] Groundwater quality data collected at these key locations also indicate that the Eastern Plume sinks very rapidly to significant depths in the vicinity of the BGEWD wells. For example, PCE concentrations were found between 292 and 372 ft-bgs at TMW-8D (D&B, 2009).[10] Due to the presence of the BGEWD wells and the stronger downward gradients present in the vicinity of the wells, the OU1 Eastern Plume plunges quickly west of TMW-7. In addition, there is a large recharge basin (Basin 51) present immediately to the south of the BGEWD well field. Groundwater elevations collected at monitoring wells located near the recharge basin (MW-15, MW-16S/D, and MW-17S/D) rose sharply (0.5 to 1 foot) on April 17, 2011, in response to a 1.38 inch precipitation event on April 16, 2011 (HDR, 2011, Figure 15).[11] This hydraulic response also indicates that the recharge basin could be further increasing the downward vertical gradient in this area (due to the groundwater mound associated with the recharge basin), thereby pushing the Eastern Plume deeper.

The Eastern Plume contributes to the groundwater contamination observed at the BGEWD wells. PCE and TCE are the key CVOCs detected at the BGEWD wells (Figures 2.16 and 2.17). Given the high PCE and TCE concentrations associated with the Eastern Plume (PCE up to 120,000 µg/L and TCE up to 5,900 µg/L), the presence of strong vertical gradients in the area where the Eastern Plume is present and in the vicinity of the well field (based on groundwater elevation measurements, presence of the recharge basin, and observed CVOC concentrations), the observed PCE and TCE concentrations at the BGEWD well field are in all likelihood being caused by the Eastern Plume.

2.7.3 NCIA Central Plume

The chemical signature of the NCIA Central Plume is distinct from the Eastern and Western Plumes. TCA and TCE are the primary CVOCs at the source areas within the NCIA. Groundwater quality data

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parameters used to calculate the groundwater flux were: Kh –Magothy = 81 ft/day; Kh – Upper Glacial = 170 ft/day; hydraulic gradient = 0.0015 ft/ft.

[8] Travel time analyses further confirm that the NCIA Eastern Plume accounts for the impacts observed in the western portion of OU1.

[9] Note, as discussed in Section 2.2, there are uncertainties associated with the quality of the data at shallow depths at seven of the TMWs, given the sampling techniques utilized. Notwithstanding these data limitations, we have used these data in our analysis.

[10] Note, HDR installed additional monitoring wells MW-15 and MW-16S/16D along a flow line between TMW-7 and TMW-8D to better define groundwater quality in this area. However, these monitoring wells are too shallow (base of wells ranged from 205 to 285 ft-bgs) and hence would have missed the plume in this area.

[11] These groundwater elevation data were collected prior to the pump test at well EX-1 as part of the supplemental PDI (HDR, 2011).

indicate that both TCA and TCE were present at elevated concentrations in the 1990s at the NCIA Central Plume properties (Figures 2.18c, 2.19c, and 2.20c). TCA has been detected in groundwater at concentrations as high as 79,000 µg/L (N-10470, 55-65 ft-bgs, NYSDEC, 2000; NC-24, 46-56 ft-bgs; LMS, 1995) which is in excess of 1% of its aqueous solubility and thus an indication that NAPL may be present. TCE has been detected at concentrations as high as 3,700 µg/L (GP-150, 78-81 ft-bgs, NYSDEC, 2000).

The Central Plume's unique chemical signature (TCA, 1,1-DCE, and TCE) enables tracking of this plume as it migrates into OU1. Groundwater quality data and the corrected molar ratio analysis show that the Central Plume flows in a southwest direction. As previously discussed (Section 2.5), 1,1-DCE is uniquely associated with the degradation of TCA and is not expected to be generated at appreciable concentrations as a degradation product of PCE or TCE. Elevated TCA concentrations were found in the south-central portion of the NCIA (*e.g.*, >10,000 µg/l at wells N-01470, NC-24, MDCW-1S, N-11855, MDC-1S, and GW-4), on and downgradient of the Tishcon properties (Figure 2.18a). As this TCA-related plume migrates into OU1, the presence of 1,1-DCE defines the path of the Central Plume, which extends through the following key wells: TMW-6, MW-5/6, TMW-5, MW-1, MW-2/3/4, MW-10, GWHP-1, MW-3, MW-4, TMW-3D, and TMW-2 (Figure 2.9). In addition to TCA and its degradation products, the low PCE to TCE molar ratio is another useful line of evidence for defining the Central Plume's flow path. At locations TMW-6, EW-2B, TMW-5, MW-2, MW-3, MW-4 and TMW-2, the PCE to TCE molar ratio is strongly aligned with the Central Plume signature (molar ratios <1; Figure 2.10). At TMW-3D, the signature is consistent with the comingling of the Central and Eastern Plumes.

The vertical progression of the NCIA Central plume can be traced from wells in the NCIA Central Plume source area into OU1 (Figure 2.23). In the Central Plume source area, TCA and its degradation byproducts are located at depths ranging from 40 ft-bgs to 100 ft-bgs (*e.g.*, MDCW-1, MDC-1, and TGPA-60/80); at MW5/6 in OU1, the center of the plume is located at 110 ft-bgs; at TMW-5, GWHP-1, and MW-1/2/3/4, the highest concentrations are located at about 140 ft-bgs; and at TMW-2 in western OU1, the highest concentrations are located at about 250 ft-bgs.

The Central Plume is a significant contributor to groundwater contamination within OU1.

2.7.4 NCIA Western Plume

The NCIA Western Plume originates from industrial facilities located in the western portion of the NCIA (Figure 1.2). Elevated PCE and TCE concentrations have been detected in groundwater on the Western NCIA properties; PCE has been detected at a maximum concentration of 12,000 µg/L in groundwater (GP-95, 83-85 ft-bgs; NYSDEC, 2000); TCE has been detected at a maximum concentration of 7,200 µg/L (N-10319; NYSDEC, 2000). The NCIA western plume's molar ratio indicates that PCE is the predominant compound, with an average PCE to TCE molar ratio of 5.

The NCIA Western Plume is shallow and groundwater concentrations attenuate rapidly with depth on the NCIA Western Plume properties. The highest PCE and TCE concentrations detected within the NCIA Western Plume were found at depths ranging from 50 to 85 ft-bgs, approximately the top 35 ft of the water column (*e.g.* GP-186, GP-184, AW-2U-IMC, AGGW-05; Figures 2.24 and 2.25). However, both PCE and TCE concentrations attenuate significantly with depth (*e.g.*, 130 to 140 ft-bgs; Table 2.6).

Table 2.6 NCIA Western Plume – Attenuation With Depth[12]

	MW-5U/L-IMC	MW-6U/L-IMC	MW-7U/L-IMC
Maximum PCE Concentration Detected			
Shallow (45-60 ft-bgs)	310 µg/L	140 µg/L	26 µg/L
Deep (130-140 ft-bgs)	16 µg/L	11 µg/L	13 µg/L
Attenuation Factor	19	13	2

Note:
PCE = Tetrachloroethene.

The NCIA Western Plume flows to the southwest consistent with regional hydrogeology (Figures 2.18a, 2.19a, and 2.20a). The maximum historical extent of the NCIA Western Plume did not migrate south of Old Country Road and or the boundary of the New Cassel Hicksville Contaminated Groundwater Superfund Site (Figures 2.18a, 2.24, and 2.25). Sample location IRM-HP-3, located about 340 ft south of the OU1 boundary and approximately 1,250 ft from the NCIA Western Plume source areas defines the maximum downgradient extent and maximum depth of the NCIA Western Plume (Figures 2.24 and 2.25). Data from this location, collected in 1997, show PCE concentrations ranging from non-detect to 77 µg/L and TCE concentrations ranging from non-detect to 202 µg/L (NYSDEC, 2000). The vertical limits of the NCIA Western Plume at IRM-HP-03 (defined as any concentration measured in excess of the New York SCGs) extended from 90 to 130 ft-bgs (Figures 2.24 and 2.25). Thus, even at the maximum historical downgradient extent of the NCIA Western Plume, it remained shallow.

The NCIA Western Plume has never impacted the BGEWD water supply wells. The NCIA Western Plume sources are located 3,000 ft northwest of the BGEWD water supply wells (Figure 2.16). Because the natural groundwater flow direction is to the southwest, it is not possible for any Western NCIA sources to have caused any impacts at the BGEWD wells. Furthermore, because the NCIA Western Plume is shallow, it is not hydraulically influenced by operation of the BGEWD pumping wells approximately 500 ft-bgs. The operation of the BGEWD pumping wells produces a strong local downward vertical flow gradient (see Table 2.3) and facilitates the downward vertical transport of upgradient NCIA Central and NCIA Eastern Plumes, but this does not extend to the NCIA Western Plume. Finally, Dr. Vasudevan, the director of the Remedial Bureau at NYSDEC, stated in his January 2010 Declaration (Vasudevan, 2010), "it is unlikely that BGEWD supply wells 1 and 2 were ever impacted by the [NCIA] Western Plume."

No NAPL has ever been visually observed in groundwater on the NCIA Western Plume properties. However, PCE has been detected in a few samples at concentrations in excess of 1% of its aqueous solubility. Despite the presence of limited elevated historical PCE concentration data, the rapid attenuation of concentrations with distance and with time, and the lack of any deep plume migration, lead us to conclude that the extent of NAPL, if any, was localized and was effectively addressed by remedial actions undertaken at the source areas in the Western NCIA.

The spatial and vertical extent of the NCIA Western Plume has always been smaller than the other NCIA plumes. The limited extent of the NCIA Western Plume was affirmed in the 2003 ROD for off-Site groundwater (NYSDEC), which concluded that the downgradient extent of the NCIA Western Plume was limited even before source remediation actions were undertaken. As reported in the ROD (NYSDEC, 2003) (Figure 2.27), the maximum PCE concentration detected in the downgradient NCIA Western Plume (south of Old Country Road) was 1 µg/L, TCE was not detected, and the maximum reported total VOC concentration was 3 µg/L. None of these concentrations exceed the New York SCGs.

[12] Monitoring wells shown in this table are located adjacent to Swalm Street, south of Main Street.

[NCIA] Western Plume
1996 - 2000 Data

Contaminant of Concern	Range of Detected Concentration North of Old Country Road (ppb)				Range of Detected Concentration South of Old Country Road (ppb)				SCGs (ppb)
	50-99 ft	100-124 ft	125-200 ft	200+ ft	50-99 ft	100-124 ft	125-200 ft	200+ft.	
Trichloroethylene	2 j-73	2 j-8 j	-	-	ND	ND	ND	-	5
Tetrachloroethylene	1 j-96	1 j-4 j	-	-	1 j	ND	ND	-	5
Trichloroethane	1 j-52	3 j	-	-	1 j-2 j	2 j	2 j	-	5
Total VOC's*	1-207	1-38	-	-	1-3	ND	1-3	-	100

Figure 2.27 NCIA Western Plume Groundwater Concentration Summary (Source: Table 2 of ROD; NYSDEC, 2003)

Source remediation was implemented early (*e.g.*, starting in 1993) in the western portion of the NCIA and have effectively reduced groundwater concentrations in and downgradient of the source areas. As a result of aggressive source remedial actions and the natural flushing of the aquifer, PCE and TCE concentrations in the NCIA Western Plume have attenuated significantly over the past 20 years. The average PCE concentration in groundwater samples collected in the western portion of the NCIA (sample locations used in this analysis are shown on Figure 2.28) has declined from 238 µg/L to 21 µg/L; the average TCE concentration has declined from 119 µg/L to 2 µg/L (Table 2.7).

Table 2.7 PCE, TCE, and TCA Concentrations over Time in the NCIA Western Plume

Time Interval	No. of Groundwater Samples Collected	Average PCE Concentration (µg/L)	Average TCE Concentration (µg/L)	Average TCA Concentration (µg/L)
1994-1998	189	238	119	12
1999-2007	458	25	5	5
2008-2011	46	21	2	2

Notes:
PCE = Tetrachloroethene; TCE = Trichloroethene; TCA = 1,1,1-Trichloroethane

Time *versus* concentration plots which present data from all wells in the NCIA Western Plume show similar declining concentration trends (Figures 2.29 through 2.31). Both the median PCE and TCE concentration detected in the NCIA Western Plume over the last 6 years is less than 10 µg/L (Figures 2.29 through 2.31). Additionally, concentration versus time plots for selected wells along the NCIA Western Plume flow path provide further evidence of attenuation (Figure 2.32). For example, at N-10477, a downgradient well in the NCIA Western Plume flow path, concentrations of PCE declined from 640 µg/L in 1985 to non-detect in 2000. At N-10324, concentrations of TCA declined from 4,400 µg/L in 1985 to 52 µg/L in 2000. At N-10319, between 1987 and 1997, concentrations of TCE declined from 7,200 µg/L[13] to 290 µg/L and PCE declined from 2,200 to 510 µg/L. Due to the rapid attenuation over time, the current extent of the NCIA Western Plume is contained entirely within the NCIA and does not enter either OU1 or the New Cassel/Hicksville Groundwater Superfund Site at concentrations in excess of SCGs (Figures 2.33 and 2.34).

The NCIA Western Plume was shallow, limited in spatial extent, and was aggressively remediated. The Western Plume has no impact on groundwater quality in OU1.

[13] This is the maximum TCE concentration ever detected in the NCIA Western Plume.

3 The Remedial Approach Proposed by USEPA is Inappropriate Since it Relies on a Flawed CSM, Utilizes Remedial Technologies that NYSDEC Rejected Previously, and will be Disruptive, Difficult to Implement, and Not Cost-effective

This section critiques the USEPA-proposed remedial design for OU1. In addition to a flawed CSM, USEPA did not adequately assess the remedial alternatives as part of the Feasibility Study, *e.g.*, did not undertake any evaluation of the time required to achieve cleanup targets for the MNA alternative and summarily dismissed this option. Consequently, the remedial design proposed by USEPA is unnecessarily onerous, not cost-effective, and does not comply with the requirements of the National Contingency Plan. In addition, one of the remedial technologies selected by USEPA, in-well vapor stripping, was not only previously rejected by NYSDEC, but the approach was implemented just east of OU1 and failed.

3.1 USEPA's Proposed Plan is Inappropriate Since it Relies on a Flawed CSM

By failing to accurately characterize the groundwater flow and plume migration directions, USEPA's Proposed Plan is fundamentally flawed and will not achieve the Remedial Action Objectives (RAOs). Figures 3.1 and 3.2, which present an overlay of the proposed USEPA remedy on the current PCE and TCE plume configuration, illustrate the problems with the proposed remedy design. The remedy was designed so that both groundwater extraction wells and in-well vapor stripping wells "blanketed" the plumes; however, because USEPA's CSM relied on an incorrect chlorinated organics molar ratio analysis approach and an incorrect groundwater flow direction (Sections 2.5 and 2.3, respectively), the proposed remedial well locations are not optimally placed. For example, USEPA has placed four in-well stripping wells and an intermediate groundwater extraction well in the northern portion of the OU1 Western Plume based on its conclusion that contaminants from the western portion of the NCIA are continuing to migrate into OU1. These wells are completely unnecessary, since as demonstrated in the corrected CSM (Section 2.7), the NCIA Western Plume is not contributing to concentrations measured in the OU1 Western Plume; due to the low concentrations in the OU1 Western Plume, MNA is a more appropriate remedy for this portion of the Site (Section 3.2).

The number of active remediation wells proposed for the three USEPA-designated OU1 Plumes are not consistent with the observed contamination. The Proposed Plan locates a significant number of wells (20 in-well stripping wells and 3 groundwater extraction wells) at the downgradient edges of the plumes, but in comparison, does very little to address the head of the plume (*i.e.*, the OU1 Eastern Plume), which is contributing a significant majority (approximately 750 kgs/yr; see Section 2.7.2) of the contaminant mass to OU1 (Figures 3.1 and 3.2). As discussed in Section 2.7, a significant quantity of DNAPL is present at the Frost Street sites (NCIA Eastern Plume) and high groundwater concentrations are continuing to flow into OU1 in this area. Figure 3.1 shows that that the highest PCE (and other CVOC) concentrations are

present immediately downgradient of the eastern section of the NCIA. In addition, the Proposed Plan ignores the southwestern component of the Eastern Plume that sinks to depths greater than 400 ft-bgs in the vicinity of the BGEWD wells and is among the key sources of contamination reaching these water supply wells.

The Proposed Plan also does not address the groundwater contamination associated with the Upgradient Plume. The Upgradient Plume has been demonstrated to be extending into the NCIA and OU1 at a depth of 200 to 430 ft-bgs (Section 2.6). Despite this, USEPA has completely ignored the presence of and the need for remedial measures to address this contamination. The proposed groundwater extraction wells are not deep enough and are not placed in the appropriate locations to address the contamination relatedto the Upgradient Plume. The estimated PCE/TCE groundwater plume extent attributable to the Upgradient Plume (Figures 2.20a, 2.20b, and 2.13), along with vertical profiling results (WP-07; Figure 2.12), should be used by USEPA to determine the placement of additional remediation well locations to address this contamination.

3.2 Monitored Natural Attenuation is the Appropriate Remedy for the Dilute Plume

Continued groundwater treatment at the BGEWD wells and MNA is the most appropriate remedial approach for addressing the residual contamination present in the central and western portions of OU1. The Proposed Plan specifies the following RAOs:

- Prevent or minimize current and potential future human exposure (*via* ingestion and dermal contact) to VOCs in groundwater at concentrations in excess of federal and state standards;
- Minimize the potential for further migration of groundwater with VOC contaminant concentrations greater than federal and state standards; and
- Restore the impacted aquifer to its most beneficial use as a source of drinking water by reducing contaminant levels to the federal and state standards.

Continued wellhead treatment at the BGEWD wells and MNA will meet these RAOs in a much more cost-effective manner than the other alternatives considered by USEPA in the Feasibility Study.

Current and potential future human exposures are already being controlled by wellhead treatment and the institutional controls that are already in-place. The only current human health exposure pathway to OU1 groundwater is *via* the BGEWD supply wells. However, because an effective wellhead treatment system has been installed, the supply wells are not an exposure pathway of concern – a conclusion also reached by the State of New York. Furthermore, restrictions on the development of OU1 groundwater as a potable water source are already in place. Consequently, there is no current or potential future human health exposure related to impacted OU1 groundwater. The 2003 off-Site groundwater ROD (NYSDEC, 2003) affirms this conclusion:

> The area is served by public water, however, the underlying aquifer is the source of the water supply for the Bowling Green Water District customers. A supplemental treatment system, air stripping followed by carbon polishing, was constructed in 1996 to mitigate the impact of the groundwater contamination on the Bowling Green Water District water supply wells. The Bowling Green water supply wells are routinely monitored for volatile organic contamination. Presently, no site specific contaminants exceeding drinking water standards have been detected in water distributed to the public. Early warning

monitoring wells have been installed south of Old Country Road, in locations downgradient of the NCIA hazardous waste disposal sites and upgradient of the water supply wells, as a precautionary measure. Because of the supplementary treatment system, use of the groundwater in the area is not currently considered to be an exposure pathway of concern. Additionally, existing use and development restrictions prevent the use of groundwater as a source of potable or process water without necessary treatment as required by the Nassau County Department of Health (NCDH). (NYSDEC, 2003)

In scenarios like this where there is no human health exposure pathway, MNA is the appropriate remedy for the dilute portions of the plume. Active remedies should only be required for concentrated portions of the plume. In a technical guidance document on use of MNA, USEPA states, "following source control measures, natural attenuation may be sufficiently effective to achieve remediation objectives without the aid of other (active) remedial measures, although this must be conclusively demonstrated by long-term performance monitoring. More typically, active remedial measures (*e.g.*, SVE, air-sparging) will be applied in source areas with high concentrations of contaminants while MNA is employed for the dilute contaminant plume" (USEPA, 2004). Although there is no uniform standard for what constitutes a "dilute" or "concentrated" plume, precedent has been set by USEPA. The Five Year Review Report for the Picillo Pig Farm Superfund Site in Rhode Island distinguishes the "concentrated plume area" from the "dilute plume area"; the former is defined as the area of the plume with total VOC concentrations greater than 1,000 µg/L (USEPA Region I, 2008).

There is further precedent for the implementation of MNA in dilute, chlorinated organics plumes with characteristics similar to those of the Western portion of OU1, as summarized below.

- The Peninsula Boulevard Groundwater Plume Superfund Site located in Hempstead, NY, contains a combined PCE/TCE groundwater plume measuring approximately 3,500 ft long by 1,000 ft at the widest point, and extending up to 75 ft-bgs (USEPA Region II, 2011). The USEPA-selected source remedy was groundwater pump and treat, with in-situ chemical treatment of targeted higher concentration zones (USEPA Region II, 2011). MNA was the selected remedy for the edges and downgradient areas of the plume where TCE concentrations range from 5 to 100 µg/L (USEPA Region II, 2011; ASTDR, 2007).
- The Pohatcong Valley Groundwater Contamination Superfund Site located in Washington and Franklin Townships, NJ, contains a 2,746-acre PCE and TCE groundwater plume (CH2M Hill, 2005; USEPA Region II, 2013b). Groundwater extraction and treatment was the selected remedy for portions of the plume with TCE concentrations greater than 500 µg/L; MNA was the selected remedy for areas with TCE concentrations less than 500 µg/L (USEPA, 2006a).
- The West Kingstown Town Dump/University of Rhode Island Disposal Area Superfund Site located in South Kingstown, RI, contains a combined PCE/TCE plume measuring approximately 2,500 ft long. In-situ chemical oxidation was the selected remedy for the source area, while MNA was the selected remedy for the downgradient area, where TCE concentrations reach a maximum of 324 µg/L (USEPA, 2006b).
- The Dover Municipal Landfill Superfund Site located in Dover, NH, contains two VOC plumes – PCE, TCE, toluene, and vinyl chloride – measuring approximately 3,200 ft long by 2,400 ft wide in total. Groundwater extraction and treatment was the selected remedy for the Southern Plume, while MNA was the selected remedy for the more dilute Eastern Plume, where all VOC concentrations are under 1,000 mg/L (USEPA, 1991).

Finally, USEPA, in its rejection of the MNA alternative in the Feasibility Study and the Proposed Plan, did not adequately evaluate Site conditions and the potential effectiveness of MNA. USEPA's (Region II, 2013a, p. 11) rationale for dismissing the MNA alternative is that: a) "… RAOs would not be achieved in a reasonable time frame based on Site-specific conditions" (USEPA Region II, 2013a, p. 11); and b) "Alternative 2 [MNA] does not prevent the migration of contaminants, and based on the natural attenuation evaluation conducted at the Site, there is uncertainty that biodegradation would progress at a rate such that cleanup levels would be achieved in a reasonable time" (p. 14). USEPA's (Region II, 2013a, p. 11) basis for the dismissal of MNA is completely unfounded because:

- In the Proposed Plan, USEPA acknowledges that the "time frame to meet groundwater RAOs in OU1 is difficult to predict since EPA's Supplemental FS Memorandum did not include modeling to estimate remediation time frames" (USEPA Region II, 2013a, p. 11). Since USEPA did not undertake the modeling to determine cleanup durations for the MNA alternative, the Agency's conclusion that RAOs would not be achieved in a reasonable time *has no technical basis and is mere speculation.*
- USEPA's assertion regarding the uncertainty in the biodegradation rate and its effect on meeting RAOs within a reasonable time frame is also misguided. As USEPA (Region II, 2013a, p. 11), acknowledges in the Proposed Plan, MNA includes consideration of multiple mechanisms that reduce contaminant concentrations: "biodegradation, dispersion, dilution, sorption, volatilization, and chemical or biological stabilization, transformation, or destruction of contaminants." Even though there may be some uncertainty regarding the biodegradation rate,[14] it is important to note that in a highly permeable aquifer, such as the Magothy, mechanisms like dispersion and dilution, play an extremely important role in plume attenuation. The sharp decline in groundwater concentrations observed at wells within the NCIA and OU1 (Figure 2.32) at distal locations, downgradient of source areas that have been effectively remediated, indicates that natural attenuation is occurring at the Site.
- Finally, USEPA's concern regarding MNA's inability to prevent migration of contaminants is misplaced. Groundwater quality immediately downgradient of OU1 indicates the presence of relatively low concentrations (individual CVOC concentrations ranging from 4 to 21 ug/l and 0.5 to 5 µg/l at MW-12 and MW-13, respectively). These concentrations will further decline with time as concentrations within OU1 continue to attenuate. Therefore, given the low concentrations present at the downgradient OU1 boundary and given that these concentrations are expected to decline with time, USEPA is overstating the need for preventing contaminant migration.

Overall, USEPA inappropriately and prematurely dismissed the MNA alternative, given that this alternative, together with continued wellhead treatment at the BGEWD wells and the in-place restrictions regarding installation of private wells, will meet all the RAOs, and do so most cost-effectively. Groundwater concentrations within the NCIA, downgradient of the Central and Western Plume sources, quickly attenuated after remedial measures were implemented. Once source control measures capture the NCIA Eastern Plume and migration of the Upgradient Plume into OU1 has been stopped, the downgradient portions of the OU1 plume will naturally attenuate relatively quickly.

[14] Note, declining PCE to TCE ratios along the OU1 Eastern Plume path clearly indicates that biodegradation is occurring; similarly, the generation of 1,1-DCA and 1,1-DCE along the TCA flow path demonstrates that both biodegradation and abiotic degradation are playing a significant role in attenuation of the TCA plume.

3.3 The Effectiveness of In-well Vapor Stripping at the Site is Highly Uncertain due to Significant Local Anisotropies and the Presence of Low Permeability Layers

USEPA has proposed to use in-well vapor stripping in the distal portions of the OU1 plume as part of the remedy designed to remove chlorinated solvents from groundwater. Although in-well vapor stripping may be an appropriate technology under certain conditions (Naval Research Laboratory, 1999), a prior report by D&B (2009) stated that the characteristics of the Magothy aquifer in the distal portions of the plume are not optimal for peak effectiveness of this technology. Furthermore, after approximately 6 years of operating an in-well vapor stripping well just east of the NCIA and OU1, a consultant for GI/Vishay concluded that heterogeneities within the Magothy Aquifer made this an unsuitable remedial technology for this site (Sobieraj, 2009). USEPA has not considered these prior conclusions in its proposed remedial design.

For optimal performance of in-well stripping, aquifer anisotropy ratios (ratio of horizontal to vertical permeability) should be in the range of 3 to 10 and low permeability layers (*e.g.*, clay and silt layers) should be absent (Naval Research Laboratory, 1999). Either high anisotropy ratios or the presence of low permeability layers (or both) can potentially limit groundwater circulation in the vicinity of wells, depending on the design of the wells and pumping system (Naval Research Laboratory, 1999). Prior investigations in the region, including two Site-specific studies, have shown that anisotropy ratios are higher than the optimal range for this technology and that low permeability clay and silt layers are present at the Site. For example, USGS reported in 1988 that anisotropy ratios in the Magothy aquifer were in the range of about 45 to 100 (USGS, 1988, Table 1). In a 2009 study, D&B concluded that in-well stripping would not be an effective remedy due to high anisotropies and the presence of "significant low permeability zones" in the area targeted for treatment (D&B, 2009). Although D&B reported anisotropy ratios, ranging from 206 to 215,642, that are considered high for the Magothy aquifer, their interpretation of gamma ray logs revealed the presence of low permeability clay and silt zones in every borehole investigated. Thus, D&B concluded that geologic conditions in the Magothy aquifer would "inhibit remediation with in-well vapor stripping." During a subsequent investigation in 2011, HDR again measured anisotropy ratios in the Magothy aquifer and reported values in the range of 17-100 (HDR, 2011), notably lower than values reported by D&B (2009) but consistent with the range previously reported by USGS (1988, Table 1). Overall, prior investigations indicated that anisotropy ratios are higher (likely on the order of 10 to 100) than the range that is considered optimal (3 to 10) for in-well vapor stripping, and there are significant low permeability clay and silt layers observed in on-site wells.

USEPA has pointed to these prior results of Site-specific investigations to conclude that in-well vapor stripping would be effective in the Magothy Aquifer and, on that premise, included it as a component of its proposed remedy for the OU1 plume. However, D&B (2009) has previously stated that the anisotropy ratios at the site are outside the "rule-of-thumb" range (, 3 to 10) and there are significant low permeability layers present (some greater than 5 feet in thickness) in every borehole. Both of these hydrogeological characteristics create the potential for reduced circulation between the upper and lower screens of the wells, which might cause this component of the remedy to be ineffective (Naval Research Laboratory, 1999). USEPA has not addressed potential performance issues related to the Site-specific hydrogeological conditions that have been previously discussed by D&B (2009) and HDR (2011).

GI/Vishay also concluded that in-well vapor stripping is not an appropriate technology for the Magothy Aquifer based on approximately 6 years of operational experience of an in-well vapor stripping IRM. The IRM was installed in 2003 in the Magothy Aquifer east of the NCIA and OU1. Soon after operation

began, problems developed including biological fouling, metal scaling, and flowing sands, as summarized in the Final IRM Progress Report below (Sobieraj, 2009):

- "In early May 2004, after approximately 10 months of operation, the first sign of biological fouling of the wells screens in UVB-1 was observed. The fouling of the well screens caused the recharge rate into the lower screen interval to decrease."
- "Fouling of the well screens in UVB-1 began again in late January 2005, just months after acid cleaning the well in October 2004. At around the same time the packers in both wells UVB-2 and UVB-3 deflated due to leaks in the packers or associated tubing, and data also indicated fouling of the UVB-2 well screens."
- "During rehabilitation of the wells in early 2005, water generated during redevelopment of the wells initially contained fine-grained materials but rapidly cleared up. The middle screened interval of well UVB-3 produced more fine-grained materials than any of the other well screens."
- "The upper screen of well UVB-1 became fouled in a shorter period of time than previously encountered, reducing the efficiency of this well. The lower screened interval of well UVB-3 became fouled in December 2006, and after the blower for well UVB-1 failed, the system was turned off for another well cleaning event in January 2007."
- "Within days of restarting the system, well UVB-1 automatically shut down due to either power failures or high water alarms caused by a blockage in the recharge line to the lower screened interval. This blockage was the result of fine-grained material entering the middle screened interval of the well during operation. After the material was removed using air-lift techniques, the well operated for only weeks before shutting down again due to a high water level alarm. At the same time, the packers were not holding the minimum pressure required to maintain inflation, and a significant amount of sand was observed in the stripping trays of the well."
- "The fourth well maintenance and cleaning event using either the Aqua Freed® process or the Aqua Gard® equipment was completed in August 2007; however, it was noted that sand was still being generated from the extraction interval of well UVB-1, causing the submersible pump to seize. Cracked fittings on the air line to the packers on both wells UVB-1 and UVB-3 were replaced, and a suction flow control device similar to that in well UVB-3 was installed in well UVB-1 as an attempt to prevent the flow of sand into the well under normal operating conditions."
- "In summary, due to down times related to damage to the IRM system by others, as well as significant down times due to well cleaning events and replacement of corroded piping, the operational efficiency of the IRM system was reduced to 28 percent in 2007."
- "When in operation, the minimal water that was removed was recharged to the upper screened interval due to blockage by sand in the lower screened interval. Finally, this well was rendered completely inoperable by the fine sands in the formation in June 2008."

After 6 years of remedy operation, GI/Vishay's consultant concluded the following (Sobieraj, 2009):

> Based on WSP Engineering's operational experience, circulation well technology does not appear to be adaptable to the specific hydrogeologic conditions encountered within the groundwater bearing zones carrying the various regional plumes. Dvirka & Bartilucci, the State's engineers conducting the pre-design report for the Bowling Green/NCIA OU-3, reached a similar conclusion in their draft pre-design report.

> WSP Engineering attributes the overwhelming flow of fine sand into UVB-1 to the variable, heterogeneous nature of the aquifer materials. […] Therefore, WSP Engineering concludes that it would be infeasible to design a screen size and filter pack that could both: 1) withstand long term operations and the intensive well cleaning required to control chemical and biological fouling, and 2) achieve the extraction and recharge flow rates necessary for successful development of a circulation cell.

USEPA, in its Proposed Plan, has failed to consider in-well vapor stripping literature guidance, prior state consultant's conclusions about the effectiveness of the technology, and 6 years of unsuccessful attempts to implement in-well vapor stripping in the Magothy Aquifer east of OU1.

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Appendix A

List of Documents and Data Sources that USEPA Should Have Relied Upon in Developing Their CSM

Appendix A: List of Documents/Data Sources that USEPA Should Have Relied Upon in Developing CSM

No.	Reference
1	Black, JP ; Sobieraj, JA. [ESC Engineering of New York, P.C.]. February 14, 200e. "Letter to K. Carpenter (NYSDEC) re: Clarifications on Revision No. 1 to the Groundwater IRM Pilot Test Design Report, Former General Instruments Corporation Site, Hicksville, New York." 3p. ALBED00132681 - ALBED00132683.
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37	Haimson, JS. [Holzmacher, McLendon & Murrell, P.C. (H2M Group)]. January 23, 1991. "Letter to T. Kinsley (Nassau County Department of Health) re: Utility Manufacturing Co., Inc., Westbury, New York Facility, groundwater sampling and analysis of upgradient monitoring well." 10p. SAD 349248 - SAD 349257.
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40	Holzmacher, McLendon & Murrell, P.C.. April 1991. "Preliminary Site Investigation Report, Permafuse Corporation, 675 Main Street, Westbury, New York." Report to Permafuse Corporation (Westbury, NY). 60p. SAA 181891 - SAA 181950.
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42	Impact Environmental (Kings Park, NY). May 28, 1991. "Environmental Assessment, Property Located at 95 Hopper Avenue, New Cassel, New York, Nassau County Tax Map Number 011-071-9, 10, 11, 12, 13, 54, 55, 56, 57 & 58." 24p. SW 117448 - SW 117471.
43	Impact Environmental (Kings Park, NY). May 28, 1991. "Appendix: Environmental Assessment, Property Located at 95 Hopper Avenue, New Cassel, New York, Nassau County Tax Map Number 011-071-53, 54, 55, 56, 57 & 58." 63p. SW 126183 - SW 126245.
44	ERM-Northeast. December 1991. "Phase II Investigation Work Plan, Air Techniques Site, Hicksville, Nassau County, New York, Site #1-30-040 (Second Revision)." Report to GTE Products Corporation. 137p. SSB 204500 - SSB 204636.
45	Fanning, Phillips & Molnar (Ronkonkoma, NY). December 1991. "Potentially Responsible Party Petition to Delist, The Metpar Corp., 95, 97, and 99 State Street, New Cassel, New York (Registry Number 1-30-043)." Report to Metpar Corp. (New Cassel, NY). Submitted to New York State, Dept. of Environmental Conservation (NYSDEC). 180p. SSB 034033 - SSB 034250.

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60	Stearns & Wheler (Cazenovia, NY). June 1992. "Feasibility Study, General Instrument Corporation, Hicksville, New York (Draft Report)." Report to General Instrument Corp.. 70p. SAD 111978 - SAD 112047.
61	Anson Environmental Ltd. (Northport, NY). August 1992. "Phase II Investigation Report for Nassau County Section 11, Block 328, Lots 46 and 176 [694 and 770 Main Street], New Cassel Industrial Area (Site No. 130043) Inactive Hazardous Waste Disposal Site, Nassau County, New York." 822p. SSB 012272 - SSB 013094.
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63	Lawler, Matusky & Skelly Engineers (Pearl River, NY). September 1992. "PSA Work Plans for New Cassel Industrial Area Site." Report to New York State, Dept. of Environmental Conservation (NYSDEC), Division of Hazardous Waste Remediation (Albany, NY). 47p. SSB 015738 - SSB 015784.
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65	ERM-Northeast (Woodbury, NY). October 28, 1992. "Phase II Investigation Report, Air Techniques Site, Hicksville, Nassau County, New York, Site No. 1-30-040 (Draft)." Report to GTE Products Corp. (Stamford, CT). 55p. SSB 192298 - SSB 192352.
66	Anson Environmental Ltd. (Huntington, NY). November 21, 1992. "Closure Plan, IMC Magnetics Corp., 570 Main Street, Westbury, NY 11590." Report to New York State, Dept. of Environmental Conservation (NYSDEC), Region 1 (Stony Brook, NY). EPA Identification Number: NY002041895, 13p.

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No.	Reference
67	Anson Environmental Ltd. (Northport, NY). December 17, 1992. "Closure Plan, IMC Magnetics Corp., 570 Main Street, Westbury, NY 11590." Report to New York State, Dept. of Environmental Conservation (NYSDEC), Region 1 (Stony Brook, NY). EPA Identification Number: NY002041895, 13p.
68	Anson Environmental Ltd.. 1993. "[Phase II Investigation Report for 93 and 100 Kinkel Street, New Cassel Industrial Area (Site No. 130043) Inactive Hazardous Waste Disposal Site, Nassau County, New York. Volume One.]" 71p. SSB 010809 - SSB 010879.
69	Anson Environmental Ltd. (Huntington, NY). 1993. "1993 Closure Plan Implementation, IMC Magnetics Corp., 570 Main Street, Westbury, New York. Volume 1, Section 1.0 - 4.0." Report to New York State, Dept. of Environmental Conservation (NYSDEC), Region 1 (Stony Brook, NY). 29p.
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73	Smith, DJ. [Holzmacher, McLendon & Murrell, P.C. (H2M Group)]. January 25, 1993. "Letter to A. Gara (NYSDEC) re: Uniflex, Inc. - Response to NYSDEC's letter dated December 24, 1992 regarding a NYSDEC hazardous waste compliance inspection." 66p. SSB249512 - SSB249577.
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75	Anson Environmental Ltd. (Huntington, NY). March 1993. "Phase II Investigation Report for Nassau County Section 11, Block 74, Lots 1-16, 75-82 New Cassel Industrial Area (Site No. 130043) Inactive Hazardous Waste Disposal Site, Nassau County, New York. Volume One." 209p. SSB 009225 - SSB 010048.
76	Anson Environmental Ltd. (Huntington, NY). March 1993. "Phase II Investigation Report for Nassau County Section 11, Block 74, Lots 1-16, 75-82 New Cassel Industrial Area (Site No. 130043) Inactive Hazardous Waste Disposal Site, Nassau County, New York. Volume Two: Environmental Site Assessment Research Data." 167p. SSB 009282 - SSB 009448.
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78	Anson Environmental Ltd. (Huntington, NY). March 1993. "Phase II Investigation Report for Nassau County Section 11, Block 74, Lots 1-16, 75-82 New Cassel Industrial Area (Site No. 130043) Inactive Hazardous Waste Disposal Site, Nassau County, New York. Volume Four: Pesticide/PCB Data." 173p. SSB 009719 - SSB 009891.
79	Anson Environmental Ltd. (Huntington, NY). March 1993. "Phase II Investigation Report for Nassau County Section 11, Block 74, Lots 1-16, 75-82 New Cassel Industrial Area (Site No. 130043) Inactive Hazardous Waste Disposal Site, Nassau County, New York. Volume Five: Inorganic Data." 234p. SSB 010286 - SSB 010519.
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83	Anson Environmental Ltd. (Huntington, NY) ; Anson, D. July 21, 1993. "Letter Report to R. Eichenwald (IMC Magnetics) re: Closure Plan, 570 Main Street, Westbury, NY [Soil sampling and laboratory results]." EPA ID # NYD002041895, 79p.
84	Terra Vac (West Trenton, NJ). July 28, 1993. "Site Health and Safety Plan for Conducting a Soil Vapor Extraction Pilot Test and an Interim Remedial Measure at the General Instrument Site in Hicksville, New York, Terra Vac Project #: 40-4156." Report to Stearns & Wheler (Cazenovia, NY). 72p. SAA 185195 - SAA 185266.
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89	Anson, D. [Anson Environmental Ltd.]. September 15, 1993. "Letter to R. Marino (NYSDEC) re: Application for the deletion of properties designated as Section, Block, Lots from the New Cassel Inactive Hazardous Waste Disposal Site (Site No. 130043)." 2p. SSB 002043 - SSB 002044.
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91	Anson Environmental Ltd. (Huntington, NY). December 3, 1993. "Closure Plan, IMC Magnetics Corp., 570 Main Street, Westbury, New York." 21p.
92	Anson Environmental Ltd. (Huntington, NY). December 3, 1993. "Closure Plan, History, IMC Magnetics Corp., 570 Main Street, Westbury, NY, 11590." Report to IMC Magnetics Corp. (Hauppauge, NY). EPA Identification Number: NY002041895, 10p.
93	Terra Vac (West Trenton, NJ). December 22, 1993. "Soil Vapor Extraction Pilot Test Report, General Instrument Site, Hicksville, New York, Terra Vac Project No. 40-4156." Report to General Instrument Corp. (Hicksville, New York).. 58p. SAA 190790 - SAA 190847.
94	H2M Labs, Inc. (Melville, NY). 1994. "Analytical Data Package, Contract No.: C003180, Case No.: SH194, SDG No. 0428-00." Report to New York State, Dept. of Environmental Conservation (NYSDEC). 23p. SSB 033372 - SSB 033394.
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96	Anson Environmental Ltd. (Huntington, NY). January 1994. "Phase II Investigation Report for Nassau County Section 11, Block 181, Lots 26-29 [84 New York Avenue] New Cassel Industrial Area (Site No. 130043) Inactive Hazardous Waste Disposal Site, Nassau County, New York. Consolidated Volume One." 151p. SSB 010958 - SSB 011108.
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98	Anson Environmental Ltd. (Huntington, NY). March 1994. "Phase I Investigation for Nassau County Section 11, Block 141, Lot 160 [1099 Old Country Road]] New Cassel Industrial Area (Site No. 130043) Inactive Hazardous Waste Disposal Site, Nassau County, New York, Owner: JEM Realty, L.P." 22p. SSB 011109 - SSB 011130.
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100	Anson Environmental Ltd. (Huntington, NY). March 1994. "Phase II Investigation Report for Nassau County Section 11, Block 7, Lots 13-15, 69-72, 67 Sylvester Street, Westbury, NewYork [Doak Pharmacal], New Cassel Industrial Area (Site No. 130043) Inactive Hazardous Waste Disposal Site, Nassau County, New York." 154p. SSB 011228 - SSB 011381.
101	Fanning, Phillips & Molnar (Ronkonkoma, NY). March 1994. "New York State Site Registry Delisting Petition for Uniflex, Inc., 474 Grand Blvd., Westbury, New York, New Cassel Inactive Hazardous Waste Disposal Site (Registry Number 1-30-043)." Report to Uniflex, Inc.. 145p. SSB 033227 - SSB 033371.
102	Lawler, Matusky & Skelly Engineers. May 1994. "PSA Tasks 5 and 6 Work Plans for New Cassel Industrial Area Site." Report to New York State, Dept. of Environmental Conservation (NYSDEC), Division of Hazardous Waste Remediation (Albany, NY). 43p. SSB 015858 - SSB 015900.
103	Fanning, Phillips & Molnar (Ronkonkoma, NY). June 1994. "Interim Remedial Measures Report for the Uniflex, Inc., Site, 474 Grand Blvd., Westbury, New York." Report to Uniflex, Inc. ; Rivkin, Radler and Kremer. 50p. SSB 033473 - SSB 033524.
104	Roth, RJ ; Peterson, RM. [Terra Vac]. July 13, 1994. "Letter to C. Gorsch (General Instrument Corp.) re: IRM monthly report-Month #2, General Instrument Site, Hicksville, New York, Terra Vac Project #40-4156." 17p. SSB 226456 - SSB 226472.
105	Roth, RJ ; Peterson, RM. [Terra Vac]. July 13, 1994. "Letter to C. Gorsch (General Instrument Corp.) re: IRM startup report, General Instrument Site, Hicksville, New York, Terra Vac Project #40-4156." 24p. SSB 226473 - SSB226496.
106	Welkin Environmental Engineering Management Co. (Massapequa, NY).. August 1994. "Decontamination Closure Report of Wafer 'A,' General Instrument Corp., Hicksville Facility, 600 West John Street, Hicksville, NY 11802." Report to General Instrument Corp. (Melville, NY).. 35p. SSB 235200 - SSB 235234.
107	Roth, RJ ; Peterson, RM. [Terra Vac]. August 16, 1994. "Letter to C. Gorsch (General Instrument Corp.) re: IRM monthly report - Month #3, General Instrument Site, Hicksville, New York, Terra Vac Project #40-4156." 32p. SSB 226361 - SSB 226392.
108	ERM-Northeast (Woodbury, NY). August 19, 1994. "Supplemental Phase II Investigation Report, Air Techniques Site, Hicksville, Nassau County, New York, Site Number 1-30-040." Report to GTE Operations Support Inc. (Stamford, CT). 40p. SSB 206415 - SSB 206454.
109	Anson Environmental Ltd. (Huntington, NY). September 1994. "Phase I Investigation Report for Nassau County Section 11, Block 77, Sections 66-69, 59 New York Avenue, New Cassel Industrial Area (Site No. 130043) Inactive Hazardous Waste Disposal Site, Nassau County, New York." 97p. SSB 011131 - SSB 011227.

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No.	Reference
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111	CA Rich Consultants, Inc. (Sea Cliff, NY). October 1994. "Work Plan, Leaching Pool Contamination, Investigation and Clean-Up, Westbury, New York." Report to Tishcon Corp. (Westbury, NY). 17p. SAA 184496 - SAA 184512.
112	Lawler, Matusky & Skelly Engineers (Pearl River, NY). October 1994. "Preliminary Site Assessment Report, New Cassel Industrial Area Site, North Hempstead, Nassau County, Appendices A-C, Report in 5 Volumes. Volume I (Revised Draft)." Report to New York State, Dept. of Environmental Conservation (NYSDEC) (Albany, NY). 196p.
113	Welkin Environmental Engineering Management Co. (Massapequa, NY).. October 1994. "Remedial Investigation Report of Wafer 'A,' General Instrument Corp., Hicksville Facility, 600 West John Street, Hicksville, NY 11802." Report to General Instrument Corp. (Melville, NY).. 17p. SSB 235155 - SSB 235170.
114	Roth, RJ ; Peterson, RM. [Terra Vac]. October 17, 1994. "Letter to C. Gorsch (General Instrument Corp.) re: IRM monthly report, operating period: September 1 - October 6, General Instrument Site, Hicksville, New York, Terra Vac Project #40-4156." 8p. SSB 226414 - SSB 226421.
115	Macri, J. [Sulzer Metco, Inc.]. October 24, 1994. "Letter to A. Gara (NYSDEC) re: Transfer of ownership." 1p. SSB246062.
116	Anson, D. [Anson Environmental Ltd.]. November 8, 1994. "Letter to R. Eichenwald (IMC Magnetics) re: Status report, 570 Main Street, Westbury, NY." 3p.
117	H2M Labs, Inc. (Melville, NY). December 1994. "Analytical Data Package for New York State Department of Environmental Conservation, Contract No.: C003180, Case No.: SH194, SDG No.: 1213, ASP A Protocol. Volatile Data Package." Report to New York State, Dept. of Environmental Conservation (NYSDEC). 17p. SSB 233490 - SSB 233523.
118	Roth, RJ ; Malmanis, E. [Terra Vac]. December 8, 1994. "Letter to C. Gorsch (General Instrument Corp.) re: IRM monthly report, operating period: October 7 - November 9, 1994, General Instrument Site, Hicksville, New York, Terra Vac Project #40-4156." 7p. SSB 226449 - SSB 226455.
119	Lawler, Matusky & Skelly Engineers (Pearl River, NY). February 1995. "Site Investigation Report, New Cassel Industrial Area Site, North Hempstead, Nassau County (Final)." Report to New York State, Dept. of Environmental Conservation (NYSDEC), Division of Hazardous Waste Remediation (Albany, NY). 225p. SAD 088924 - SAD 089148.
120	General Consolidated Industries, Inc. (East Farmingdale, NY). February 14, 1995. "Phase I Environmental Site Assessment and Phase II Subsurface Investigation, One Stop Auto & Truck Center, 299 Main Street, Westbury, New York 11590.
121	Roth, R ; Malmanis, E. [Terra Vac]. February 16, 1995. "Letter to M. Sinayuk (General Instrument Corp.) re: IRM monthly report, operating period: November 9, 1994 - January 31, 1995, General Instrument Site, Hicksville, New York, Terra Vac Project #40-4156." 7p. SSB 234010 - SSB 234016.
122	Roth, R ; Malmanis, E. [Terra Vac]. April 3, 1995. "Letter to M. Sinayuk (General Instrument Corp.) re: IRM monthly report, operating period: February 1, 1995 - February 14, 1995, General Instrument Site, Hicksville Site, Terra Vac Project #40-41569-7." 7p. SSB 225639 - SSB 225645.
123	Roth, R ; Malmanis, E. [Terra Vac]. May 5, 1995. "Letter to M. Sinayuk (General Instrument Corp.) re: IRM monthly report, operating period: March 9, 1995 - April 27, 1995, General Instrument Site, Hicksville, New York, Terra Vac Project #40-4225." 15p. SSB 225 - 669 - SSB 225683.
124	CA Rich Consultants, Inc. (Sea Cliff, NY). June 1995. "Hazardous Waste Reduction Plan." Report to Tishcon Corp. (Westbury, NY). 22p. SAA 185897 - SAA 186102.
125	Dvirka and Bartilucci Consulting Engineers (Syosset, NY). June 1995. "Packed Tower Aeration System at Bowling Green Estates Water District, Wells 1 and 2, Pre-Engineered Metal Building and Mechanical Construction Contract, P.W. No. 41-95, Town of Hempstead, Department of Water, Nassau County, New York." 13p. TOHDOW001442 - TOHDOW001454.
126	Dvirka and Bartilucci Consulting Engineers (Syosset, NY). June 1995. "Packed Tower Aeration System at Bowling Green Estates Water District, Wells 1 and 2, General Construction Contract, P.W. No. 35-95, Town of Hempstead, Department of Water, Nassau County, New York." 156p. TOHDOW001149 - TOHDOW001304.
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128	Dvirka and Bartilucci Consulting Engineers (Syosset, NY). July 1995. "Packed Tower Aeration System at Bowling Green Estates Water District, Wells 1 and 2, Electrical Construction Contract, P.W. No. 42-95, Town of Hempstead, Department of Water, Nassau County, New York." 213p. NCDOH000569 - NCDOH000781.
129	Fanning, Phillips and Molnar (Ronkonkoma, NY). July 1995. "Draft Focussed Source Area Remedial Investigation Work Plan for Metpar Corporation, 95, 97, and 99 State Street, New Cassel, New York." Report to Metpar Corporation. Submitted to New York State, Dept. of Environmental Conservation (NYSDEC). 89p. SAA 158312 - SAA 158400.
130	Stearns & Wheler (Cazenovia, NY). August 1995. "IRM Work Plan, Excavation of Former Sump Area, General Instrument Corporation, Hicksville, New York." Report to General Instrument Corp.. 43p. SAA 185268 - SAA 185310.
131	Vinci, A ; Roth, R. [Terra Vac]. August 7, 1995. "Letter to M. Sinayuk (General Instrument Corp.) re: IRM monthly report, operating period: June 1, 1995 to June 28, 1995, General Instrument Site, Hicksville, New York, Terra Vac Project #40-4225." 9p. SSB 225659 - SSB 225667.

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No.	Reference
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133	H2M Labs, Inc. (Melville, NY). September 1995. "Analytical Data Package for New York State Department of Environmental Conservation, Region 0, Contract #: C003180, Case #: SH095, SDG#: 0927, Water Samples Received September 28 & 29, 1995. Sample Data Summary Package." Report to New York State, Dept. of Environmental Conservation (NYSDEC). 100p. SAD 063538 - AD 063637.
134	H2M Labs, Inc. (Melville, NY). September 1995. "Analytical Data Package for New York State Department of Environmental Conservation, Region 0, Contract #: C003180, Case #: SH095, SDG#: 0927, Water Samples Received September 28 & 29, 1995: Volatile Data. Volume 1 of 2." Report to New York State, Dept. of Environmental Conservation (NYSDEC). 308p. SAD 053115 - SAD 053422.
135	H2M Labs, Inc. (Melville, NY). September 1995. "Analytical Data Package for New York State Department of Environmental Conservation, Region 0, Contract #: C003180, Case #: SH095, SDG#: 0927, Water Samples Received September 28 & 29, 1995: Volatile Data. Volume 2 of 2." Report to New York State, Dept. of Environmental Conservation (NYSDEC). 104p. SAD 063812 - SAD 063915.
136	H2M Labs, Inc. (Melville, NY). September 1995. "Analytical Data Package for New York State Department of Environmental Conservation, Region 1, Contract #: C003180, Case #: SH095, SDG#: 0928, Water Samples Received 9/29/95: Sample Data Dummary Package." Report to New York State, Dept. of Environmental Conservation (NYSDEC). 119p. SAD 063418 - SAD 063536.
137	Lawler, Matusky & Skelly Engineers (Pearl River, NY). September 1995. "PSA Tasks 1 to 3 Work Plans for New Cassel Industrial Area Multisite PSA." Report to New York State, Dept. of Environmental Conservation (NYSDEC), Division of Hazardous Waste Remediation (Albany, NY). 48p. BPM 317293 - BPM 317340.
138	Anson Environmental Ltd. (Huntington, NY). September 7, 1995. "Work Plan, Utility Manufacturing aka Wonder King Manufacturing Site, Site ID# 130043H, 700-712 Main Street, Westbury, New York 11590." 14p. SAD 090954 - SAD 090967.
139	Anson Environmental Ltd. (Huntington, NY). October 1995. "Phase II Investigation, Utility Manufacturing/Former Wonder King, 700-712 Main Street, Westbury, New York 11590 [New York State Departtment of Environmental Conservation New Cassel Industrial Area "P" Site Investigation]." 71p. SAD 072244 - SAD 072314.
140	Anson Environmental Ltd. (Huntington, NY). October 1995. "Phase II Investigation Report for Nassau County Section 11, Block 328, Lots 142, 154, 160, 162, 178, 179, and 181; 750 Main Street/1099 Old Country Road, 770 Main Street/1111 Old Country Road [New Cassel Industrial Area ("P" Site No.130043I) Block 328 Properties, Inactive Hazardous Waste Disposal Site]." 41p. SAD 348557 - SAD 348597.
141	Fanning, Phillips and Molnar (Ronkonkoma, NY). October 1995. "Focussed Source Area Remedial Investigation Work Plan for Metpar Corporation, 95, 97, and 99 State Street, New Cassel, New York." Report to Metpar Corporation (New Cassel, NY). Submitted to New York State Department of Environmental Conservation. 92p. SSB 034340 - SSB 034431.
142	H2M Labs, Inc. (Melville, NY). October 1995. "Analytical Data Package for New York State Department of Environmental Conservation, Region 0, Contract #: C003180, Case #: CE095, SDG#: 0927, Water Samples Received October 26, 1995: Sample Data Summary Package." Report to New York State, Dept. of Environmental Conservation (NYSDEC). 174p. SAD 063638 - SAD 063811.
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144	Vinci, A ; Callaghan, JF. [Terra Vac]. October 30, 1995. "Letter to M. Sinayuk (General Instrument Corp.) re: IRM monthly report, operating period August 4, 1995 to October 12, 1995, General Instrument Site, Hicksville, New York, Terra Vac Project #40-4225." 7p. SSB 225596 - SSB 225602.
145	CA Rich Consultants, Inc. (Sea Cliff, NY). November 1995. "Focused Remedial Investigation Work Plan, Sampling & Analysis Plan and Health & Safety Plan, Tishcon Corporation, 30 - 36 New York Avenue and 31 - 33 Brooklyn Avenue, Westbury, New York." Report to Tishcon Corp. (Westbury, NY). 45p. SW 129914SW 131304 - SW 131347.
146	Anson Environmental Ltd.. November 2, 1995. "Work Plan, Atlas Graphics, Inc., 567 Main Street, Westbury, NY, Site No. 130043D." 16p. SW 123879 - SW 123894.
147	ABB Environmental Services (Portland, ME). December 1995. "Focused Remedial Investigation/Feasibility Study Work Plan - Task 1, Phase B Deliverable: 68 Kinkel Street - Former Tishcon Site, New Cassell Industrial Area, North Hempstead, New York, Site No. 1-30-43F." Report to New York State, Dept. of Environmental Conservation (NYSDEC). 37p. SSB 002992 - SSB 003028.
148	CA Rich Consultants, Inc. (Sea Cliff, NY). December 1995. "Focused Remedial Investigation Work Plan, Sampling & Analysis Plan and Health & Safety Plan, 125 State Street, Westbury, New York." Report to Tishcon Corp. (Westbury, NY). 79p. SAD 064098 - SAD 064181.
149	New York State, Dept. of Environmental Conservation (NYSDEC). December 5, 1995. "Order on consent [In the Matter of the Development and Implementation of a Focussed Remedial Investigation/Feasibility Study for an Inactive Hazardous Waste Disposal Site, Under Article 27, Title 13, and Article 71, Title 27 of the Environmental Conservation Law of the State of New York by Raylene Holding Corporation and Metpar Corp.]." INDEX # W1-0739-95-11, 17p. SAA 185174 - SAA 185190.

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No.	Reference
150	Fanning, Phillips and Molnar (Ronkonkoma, NY). 1996 ?"Focussed Source Area Remedial Investigation Report, Metpar Corp. Site, New Cassel Industrial Area (Revised)." Report to Metpar Corporation. Submitted to New York State, Dept. of Environmental Conservation (NYSDEC). 123p. SSB 034679 - SSB 034801.
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156	Lawler, Matusky & Skelly Engineers LLP. February 1996. "Multi-site PSA Report, New Cassel Industrial Area Site, North Hempstead, Nassau County. Volume IV: Appendix E (Continued)." Report to New York State, Dept. of Environmental Conservation (NYSDEC), Division of Hazardous Waste Remediation (Albany, NY). 422p. OAG005713 - OAG006134.
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163	ABB Environmental Services (Portland, ME). March 1996. "Focused Remedial Investigation/Feasibility Study Work Plan: 68 Kinkel Street - Former Tishcon Site, New Cassell Industrial Area, North Hempstead, New York, Site No. 1-30-43F." Report to New York State, Dept. of Environmental Conservation (NYSDEC). 167p. SSB 032522 - SSB 032688.
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Appendix A: List of Documents/Data Sources that USEPA Should Have Relied Upon in Developing CSM

No.	Reference
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173	Anson Environmental Ltd. (Huntington, NY). April 1996. "Environmental Investigation, 101 Frost Street, Westbury, New York." 43p. SAD 348476 - SAD 348518.
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176	Stearns & Wheler, LLC (Cazenovia, NY). April 1996. "Feasibility Study, Operable Unit No. 1 (Soils), General Instrument Corporation, Hicksville, New York (Draft Report)." Report to General Instrument Corp.. 80p. SSB 237061 - SSB 237140.
177	Stearns & Wheler, LLC (Cazenovia, NY). April 1996. "Remediation Work Plan, Operable Unit 1, Area of Concern C, General Instrument Corporation, Hicksville, New York." Report to General Instrument Corp.. 77p. SAA 185312 - SAA 185388.
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180	Bonifas, MJ. [Hull & Associates, Inc.]. May 9, 1996. "Letter to C. Vasudevan (NYSDEC) re: Monthly Progress Report #1 for March 26, 1996 through May 9, 1996 for the Interim Remedial Measure Program (IRM Program) at the NYSDEC Site Code #130043A in Westbury, New York; NMB004D.026." 3p. SSB 003401 - SSB 003403.
181	Roth, RJ ; Callghan, JF. [Terra Vac]. June 4, 1996. "Letter to B. Curtis (General Instrument Corp.) re: Response to letter of May 29, 1996 regarding IRM, General Instrument Corporation, Hicksville, NY, Terra Vac Project 40-4225." 3p. SDOH 241433 - SDOH 241435.
182	New York State, Dept. of Environmental Conservation (NYSDEC). June 5, 1996. "Order on consent [In the Matter of the Development and Implementation of a Focussed Remedial Investigation/Feasibility Study for an Inactive Hazardous Waste Disposal Site, Under Article 27, Title 13, and Article 71, Title 27 of the Environmental Conservation Law of the State of New York by Tishcon Corporation]." INDEX # W1-0758-95-05, 18p. BPM 298667 - BPM 298684.
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Appendix A: List of Documents/Data Sources that USEPA Should Have Relied Upon in Developing CSM

No.	Reference
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196	Stearns & Wheler, LLC (Cazenovia, NY). September 1996. "Remediation Work Plan, Operable Unit 1 (Soils), General Instrument Corporation, Hicksville, New York (Draft)." Report to General Instrument Corp.. 61p. SAA 185390 - SAA 185450.
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200	Stearns & Wheler, LLC (Cazenovia, NY). October 1996. "Feasibility Study, Operable Unit No. 1 (Soils), General Instrument Corporation, Hicksville, New York (Final Report)." Report to General Instrument Corp.. 98p. SAA 190849 - SAA 190946.
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203	Bonifas, MJ. [Hull & Associates, Inc.]. November 11, 1996. "Letter to C. Vasudevan (NYSDEC) re: Progress Report #6 for September 10, 1996 through November 9, 1996 for the Interim Remedial Measure Program (IRM Program) at the NYSDEC Site Code #130043A in Westbury, New York; NMB004D.039." 2p. SAD 043685 - SAD 043686.
204	CA RICH Consultants, Inc. (Sea Cliff, NY). December 1996. "Focused Remedial Investigation Report, Tishcon Corporation, 125 State Street, Westbury, New York." Report to Tishcon Corporation. 256p. SAD 064183 - SAD 064438.
205	CA Rich Consultants, Inc. (Sea Cliff, NY). December 1996. "Focused Remedial Investigation Report, Tishcon Corporation, 125 State Street, Westbury, New York." Report to Tishcon Corp. (Westbury, NY). 256p. SAD 064183 - SAD 064438.
206	YEC, Inc. (Valley Cottage, NY). December 1996. "Draft Preliminary Site Assessment, Detailed Site History, New Cassel Industrial Area Site, North Hempstead, Nassau County." Report to Lawler, Matusky & Skelly Engineers (Pearl River, NY). Submitted to New York State, Dept. of Environmental Conservation (NYSDEC). 30p. SAD 350110 - SAD 350139.
207	Werle, C ; Wenz, KP. [ERM-Northeast]. December 5, 1996. "Letter to R. Lee (NYSDEC) re: Air Techniques, Site #1-30-040, ground water monitoring program." 11p. SSB 195287 - SSB 195297.
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209	Arkwin Industries, Inc.. 1997. "Work Plan, Arkwin Industries, Inc., 648-656 and 662-670 Main Street and 66 Brooklyn Avenue, Westbury, NY, Site # 130043D." Report to New York State, Dept. of Environmental Conservation (NYSDEC). 27p. SW 127268 - SW 127294.
210	H2M Labs, Inc. (Melville, NY). 1997. "Sample Data Summary Package, New York State Department of Environmental Conservation, Region 1, Contract: C003180, Case: RA096, SDG: 0121, Sample Received 1/23/1997." Report to New York State, Dept. of Environmental Conservation (NYSDEC). 48p. SAA 177246 - SAA 177293.

Appendix A: List of Documents/Data Sources that USEPA Should Have Relied Upon in Developing CSM

No.	Reference
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212	H2M Labs, Inc. (Melville, NY). January 1997. "Analytical Data Package for New York State Department of Environmental Conservation, Region 0, Contract #: C003180, Case #: RA096, SDG #: 0122, Water and Soil Samples Received January 23, 1997: Metals Data." Report to New York State, Dept. of Environmental Conservation (NYSDEC). 296p. SAA 180229 - SAA 180524.
213	H2M Labs, Inc. (Melville, NY). January 1997. "Analytical Data Package for New York State Department of Environmental Conservation, Region 0, Contract #: C003180, Case #: RA096, SDG #: 0122, Water and Soil Samples Received January 23, 1997: Semivolatile Data." Report to New York State, Dept. of Environmental Conservation (NYSDEC). 86p. SAA 178275 - SAA 178360.
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215	H2M Labs, Inc. (Melville, NY). January 1997. "Analytical Data Package for New York State Department of Environmental Conservation, Region 0, Contract #: C003180, Case #: RA096, SDG #: 0124, Water and Soil Samples Received January 24, 1997: Sample Data Summary Package." Report to New York State, Dept. of Environmental Conservation (NYSDEC). 70p. SAA 175694 - SAA 175769.
216	H2M Labs, Inc. (Melville, NY). January 1997. "Analytical Data Package for New York State Department of Environmental Conservation, Contract No.: C003180, Case No.: RA096, SDG No.: 0123, ASP CLP Package. Received January 24, 1997: Sample Data Summary Package." Report to New York State, Dept. of Environmental Conservation (NYSDEC). 63p. SAA 177362 - SAA 177424.
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219	H2M Labs, Inc. (Melville, NY). January 1997. "Analytical Data Package for New York State Department of Environmental Conservation, Region 0, Contract #: C003180, Case #: RA096, SDG #: 0127. Soil Samples Received January 27, 1997. Sample Data Summary Package." Report to New York State, Dept. of Environmental Conservation (NYSDEC). 32p. SAA 179932 - SAA 179963.
220	H2M Labs, Inc. (Melville, NY). January 1997. "Analytical Data Package for New York State Department of Environmental Conservation, Region 0, Contract #: C003180, Case #: RA096, SDG #: 0127. Soil Samples Received January 27, 1997. Volatile Data." Report to New York State, Dept. of Environmental Conservation (NYSDEC). 98p. SAA 177792 - SAA 177889.
221	H2M Labs, Inc. (Melville, NY). January 1997. "Analytical Data Package for New York State Department of Environmental Conservation, Region 0, Contract #: C003180, Case #: RA096, SDG #: 0122. Water and Soil Samples Received January 23, 1997. Sample Data Summary Package." Report to New York State, Dept. of Environmental Conservation (NYSDEC). 119p. SAA 176223 - SAA 176347.
222	H2M Labs, Inc. (Melville, NY). January 1997. "Analytical Data Package for New York State Department of Environmental Conservation, Region 0, Contract #: C003180, Case #: RA096, SDG #: 0124. Water and Soil Samples Received January 24, 1997. Metals Data." Report to New York State, Dept. of Environmental Conservation (NYSDEC). 120p. SAA 174295 - SAA 174414.
223	H2M Labs, Inc. (Melville, NY). January 1997. "Analytical Data Package for New York State Department of Environmental Conservation, Region 1, Contract #: C003180, Case #: RA096, SDG #: 0121. Soil Samples Received 1/23/1997. Volatile Data." Report to New York State, Dept. of Environmental Conservation (NYSDEC). 171p. SAA 174743 - SAA 174913.
224	Stearns & Wheler, LLC (Cazenovia, NY). January 1997. "Operation, Maintenance, and Monitoring Manual, Soil Vapor Extraction System, General Instrument Corporation, Hicksville, New York (Draft). Volume 1 - General Manual." Report to General Instrument Corp.. 90p. SAA 189440 - SAA 189529.
225	YEC, Inc. (Valley Cottage, NY). January 1997. "Draft Preliminary Site Assessment, Detailed Site History, New Cassel Industrial Area Site, North Hempstead, Nassau County." Report to Lawler, Matusky & Skelly Engineers (Pearl River, NY). Submitted to New York State, Dept. of Environmental Conservation (NYSDEC). 30p. SAD 350064 - SAD 350093.
226	Bonifas, MJ. [Hull & Associates, Inc.]. January 10, 1997. "Letter to C. Vasudevan (NYSDEC) re: Progress Report #8 for December 10, 1996 through January 9, 1997 for the Interim Remedial Measure Program (IRM Program) at the NYSDEC Site Code #130043A in Westbury, New York; NMB004D.048." 2p. SAD 043616 - SAD 043617.
227	Murphy, K. [New York State, Dept. of Environmental Conservation (NYSDEC)]. January 27, 1997. "Letter to C. Conroy (Sulzer Metco, Inc.) re: Hazardous waste compliance inspection on 7/19/1996." 1p. SSB245877.
228	Anson Environmental Ltd. (Huntington, NY). February 1997. "Delisiting Petition Investigation Report, Utility Manufacturing Site, Former Wonder King Chemical Site, 700-712 Main Street, Westbury, New York 11590, New Cassel Industrial Area, Site ID# 13-0043-H." 83p. SW 132305 - SW 132387.

Appendix A: List of Documents/Data Sources that USEPA Should Have Relied Upon in Developing CSM

No.	Reference
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230	Hull & Associates, Inc. (Dublin, OH) ; Land Tech Remedial, Inc. (Farmingdale, NY). February 1997. "Final Investigation Report for the Investigation and Design of the Interim Remedial Measure for the Vadose Zone at the 570 Main Street, Manufacturing Facility, Westbury, New York, NYSDEC Site Code #130043A. Volume I." Report to IMC Eastern Corp.. HAI Document #NMB004D.032, 61p.
231	Hull & Associates, Inc. (Dublin, OH) ; Land Tech Remedial, Inc. (Farmingdale, NY). February 1997. "Final Investigation Report for the Investigation and Design of the Interim Remedial Measure for the Vadose Zone at the 570 Main Street Manufacturing Facility, Westbury, New York, NYSDEC Site Code #130043A. Volume II." Report to IMC Eastern Corp.. 357p.
232	Bonifas, MJ. [Hull & Associates, Inc.]. February 10, 1997. "Letter to C. Vasudevan (NYSDEC) re: Progress Report #9 for January 10 through February 9, 1997 for the Interim Remedial Measure Program (IRM Program) at the NYSDEC Site Code #130043A in Westbury, New York; NMB004D.050." 2p. SAD 043610 - SAD 043611.
233	Levine-Fricke-Recon Inc.. February 25, 1997. "Site Investigation Report, New Cassel Industrial Area, 89 Frost Street, 101 Frost Street, 770 Main Street, North Hempstead, New York." 215p. SAD 349528 - SAD 349742.
234	Fanning, Phillips and Molnar (Ronkonkoma, NY). March 1997. "Focussed Source Area Remedial Investigation/Interim Remedial Measures Work Plan for 675 Main Street, Westbury, New York." Report to Permafuse Properties. Submitted to New York State, Dept. of Environmental Conservation (NYSDEC). 77p. SSB 016749 - SSB 016825.
235	Lawler, Matusky & Skelly Engineers LLP (Pearl River, NY). March 1997. "Multisite PSA Task 4 Report, New Cassel Industrial Area Site, North Hempstead, Nassau County, Report and Appendix A." Report to New York State, Dept. of Environmental Conservation (NYSDEC), Division of Hazardous Waste Remediation (Albany, NY). 179p. WPED00015071 - WPED00015249.
236	Lawler, Matusky & Skelly Engineers LLP (Pearl River, NY). March 1997. "Multisite PSA Task 4 Report, Supporting Documentation - Volume I: GPR Data Summary and SVOC Analytical Data." Report to New York State, Dept. of Environmental Conservation (NYSDEC), Division of Hazardous Waste Remediation (Albany, NY). 202p. Albem-Review0003485 - Albem-Review0003686.
237	Bonifas, MJ. [Hull & Associates, Inc.]. March 10, 1997. "Letter to C. Vasudevan (NYSDEC) re: Progress Report #10 for February 10 through March 9, 1997 for the Interim Remedial Measure Program (IRM Program) at the NYSDEC Site Code #130043A in Westbury, New York; NMB004D.053." 2p. SAD 043608 - SAD 043609.
238	O'Brien & Gere Engineers, Inc.. April 1997. "Voluntary Cleanup Program Application: Former Sylvania Electric Products Incorporated Facility, Cantiague Rock Road, Hicksville, New York. Volume 1 of 2." Report to GTE Operations Support Inc.. 121p. SAD 106248 - SAD 106368.
239	O'Brien & Gere Engineers, Inc.. April 1997. "Work Plan: Former Sylvania Electric Products Incorporated Facility, Cantiague Rock Road, Hicksville, New York." Report to GTE Operations Support Inc.. 307p. SAD 106369 - SAD 106678.
240	Bonifas, MJ. [Hull & Associates, Inc.]. April 10, 1997. "Letter to C. Vasudevan (NYSDEC) re: Progress Report #11 for March 10 through April 9, 1997 for the Interim Remedial Measure Program (IRM Program) at the NYSDEC Site Code #130043A in Westbury, New York; NMB004D.056." 2p. SAD 043602 - SAD 043603.
241	New York State, Dept. of Environmental Conservation (NYSDEC). April 22, 1997. "New York State Department of Environmental Conservation, SARA Title III, Toxic Release Inventory Data, Facility Report." 7p.
242	CA Rich Consultants, Inc. (Sea Cliff, NY). May 1997. "Final Focused Remedial Investigation Report, Tishcon Corporation, 30-36 New York Avenue and 31-33 Brooklyn Avenue, Westbury, New York." Report to Tishcon Corporation. 306p. SSB 031977 - SSB 032282.
243	CA Rich Consultants, Inc. (Sea Cliff, NY). May 1997. "Final Focused Remedial Investigation Report, Tishcon Corporation, 30 - 36 New York Avenue and 31 - 33 Brooklyn Avenue, Westbury, New York." Report to Tishcon Corp. (Westbury, NY). 306p. SSB 031977 - SSB 032282.
244	CA Rich Consultants, Inc. (Sea Cliff, NY). May 1997. "Final Focused Remedial Investigation Report, Tishcon Corporation, 30 - 36 New York Avenue and 31 - 33 Brooklyn Avenue, Westbury, New York." Report to Tishcon Corp. (Westbury, NY). 307p. SW 129814
245	Lawler, Matusky & Skelly Engineers LLP (Pearl River, NY). May 1997. "Work Plan Appendix A: Subcontractor Quotation and Other Cost Backup, Former Laka Site, Westbury, Nassau County." Report to New York State, Dept. of Environmental Conservation (NYSDEC), Division of Environmental Remediation (Albany, NY). 124p. SAD 374168 - SAD 347291.
246	Merklin, WD. [Dvirka and Bartilucci Consulting Engineers]. May 8, 1997. "Letter to D. Davis (Town of Hempstead, Dept. of Water) re: Bowling Green Estates Water District, Expansion of Packed Tower Aeration System, D&B No. 1243-Q." 7p. TOHDOW002319 - TOHDOW002325.
247	Bonifas, MJ. [Hull & Associates, Inc.]. May 12, 1997. "Letter to C. Vasudevan (NYSDEC) re: Progress Report #12 for April 10 through May 9, 1997 for the Interim Remedial Measure Program (IRM Program) at the NYSDEC Site Code #130043A in Westbury, New York; NMB004D.057." 2p. SW 121606 - SW 121607.
248	New York State, Dept. of Environmental Conservation (NYSDEC). May 21, 1997. "Order on consent [In the Matter of the Development and Implementation of a Focussed Remedial Investigation/Focussed Feasibility Study for an Inactive Hazardous Waste Disposal Site, Under Article 27, Title 13, and Article 71, Title 27 of the Environmental Conservation Law of the State of New York by 2632 Realty Development Corp.]." Index # WI-0843-98506, 14p. BPM 295524 - BPM 295537.

Appendix A: List of Documents/Data Sources that USEPA Should Have Relied Upon in Developing CSM

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250	Lawler, Matusky & Skelly Engineers LLP (Pearl River, NY). June 1997. "Work Plan, Former LAKA Site and Bowling Green Early Warning Wells Remedial Investigation/Feasibility Study." Report to New York State, Dept. of Environmental Conservation (NYSDEC), Division of Environmental Remediation (Albany, NY). 110p. SAD 346943 - SAD 347052.
251	Bonifas, MJ. [Hull & Associates, Inc.]. June 10, 1997. "Letter to C. Vasudevan (NYSDEC) re: Progress Report #13 for May 10 through June 9, 1997 for the Interim Remedial Measure Program (IRM Program) at the NYSDEC Site Code #130043A in Westbury, New York; NMB004D.058." 2p. SAD 043593 - SAD 043594.
252	Fanning, Phillips and Molnar (Ronkonkoma, NY). July 1997. "Focussed Source Area Remedial Investigation/Interim Remedial Measures Work Plan for 675 Main Street, Westbury, New York." Report to Permafuse Properties. Submitted to New York State, Dept. of Environmental Conservation (NYSDEC). 84p. SSB 016663 - SSB 016746.
253	Lawler, Matusky & Skelly Engineers (Pearl River, NY). July 1997. "Updated Health & Safety Plan (HASP) and Quality Assurance Project Plan (QAPjP) for the New Cassel Industrial Area Site, Former LAKA Site." Report to New York State, Dept. of Environmental Conservation (NYSDEC) (Albany, NY). 31p. SAD 075310 - SAD 075340.
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255	Anson Environmental Ltd. (Huntington, NY). July 16, 1997. "Work Plan, Focused Remedial Investigation, Former Wonder King Chemical Site, Site # 13-0043-H, 700-712 Main Street, Westbury, New York 11590." 28p. SW 132192 - SW 132219.
256	New York State, Dept. of Environmental Conservation (NYSDEC). July 21, 1997. "Order on consent [In the Matter of the Development and Implementation of a Focused Remedial Investigation/Interim Remedial Measure for an Inactive Hazardous Waste Disposal Site, Under Article 27, Title 13, and Article 71, Title 27 of the Environmental Conservation Law of the State of New York by Permafuse Properties]." INDEX # WI-0790-97-02. 15p. SAA 182618 - SAA 182632.
257	New York State, Dept. of Environmental Conservation (NYSDEC). July 21, 1997. "Order on consent [In the Matter of Uniflex, Inc.]." Case Number: C1-6662-11-96, 4p. SSB249389 - SSB249392.
258	Buddenbaum, J. [McLaren/Hart, Inc.]. July 30, 1997. "Letter to L. Hineline (Stearns & Wheler, LLC) re: Radiological investigation report for the General Instrument site, Hicksville, New York, McLaren/Hart Proposal # CL97-0151." 8p. SSB 202094 - SSB 202101.
259	Lawler, Matusky & Skelly Engineers LLP (Pearl River, NY). August 1997. "Field Activities Plan, Former LAKA Site and Bowling Green Early Warning Wells, Remedial Investigation/Feasibility Study." Report to New York State, Dept. of Environmental Conservation (NYSDEC) Division of Environmental Remediation (Albany, NY). 60p. SAD 074516 - SAD 074575.
260	Bonifas, MJ. [Hull & Associates, Inc.]. August 11, 1997. "Letter to C. Vasudevan (NYSDEC) re: Progress Report #15 for July 10 through August 11, 1997 for the Interim Remedial Measure Program (IRM Program) at the NYSDEC Site Code #130043A in Westbury, New York; NMB004D.060." 2p. SAD 043585 - SAD 043586.
261	Anson Environmental Ltd. (Huntington, NY). August 15, 1997. "Interim Remedial Measures, Final Engineering Report, Arkwin Industries, Inc., 686 Main Street, Westbury, New York 11590 (Final)." 302p. SAA 157175 - SAA 157476.
262	Caldwell, B. [McLaren/Hart, Inc.]. August 22, 1997. "Letter to L. Hineline (Stearns & Wheler, LLC) re: Addendum to radiological investigation report for the General Instrument site, Hicksville, New York dated July 30, 1997. Reference McLaren/Hart Proposal # CL97-0151." 4p. SSB 225522 - SSB 225525.
263	New York State, Dept. of Environmental Conservation (NYSDEC). August 26, 1997. "Order on consent [In the Matter of the Development and Implementation of a Focussed Remedial Investigation/ Feasibility Study and Interim Remedial Measure Program for an Inactive Hazardous Waste Disposal Site, Under Article 27, Title 13, of the Environmental Conservation Law of the State of New York by Dermkraft, Inc.]." 14p. SAA 164938 - SAA 164951.
264	CA Rich Consultants, Inc. (Sea Cliff, NY). September 1997. "Interim Remedial Measures Letter Report, Tischon Corporation, 30 New York Avenue, Westbury, New York." Report to Tishcon Corp. (Westbury, NY). 4p. SW 129667 - SW 129670.
265	CA Rich Consultants, Inc. (Sea Cliff, NY). September 1997. "Interim Remedial Measures Letter Report, Tishcon Corporation, 125 State Street, Westbury, New York." Report to Tishcon Corp. (Westbury, NY). 5p. SAD 063166 - SAD 063170.
266	CA Rich Consultants, Inc. (Sea Cliff, NY). September 1997. "Post Remediation Groundwater Monitoring Plan, Tishcon Corporation, 125 State Street, Westbury, New York." Report to Tishcon Corp. (Westbury, NY). 6p. SAD 061450 - SAD 061455.
267	CA Rich Consultants, Inc. (Sea Cliff, NY). September 1997. "Remedial Action Plan, Tishcon Corporation, 125 State Street, Westbury, New York." Report to Tishcon Corp. (Westbury, NY). 5p. SAD 063161 - SAD 063165.
268	H2M Labs, Inc. (Melville, NY). September 1997. "Analytical Data Package for New York State Department of Environmental Conservation, Region 1, Contract #: C003180, Case #: RA097, SDG #: 0122. Water Samples Received 9/2 - 9/5/97. Volatiles Data." Report to New York State, Dept. of Environmental Conservation (NYSDEC). 405p. SAA 172909 - SAA 173313.
269	Lawler, Matusky & Skelly Engineers LLP (Pearl River, NY). September 1997. "Amendment No. 1, Former LAKA Site Remedial Investigation/Feasibility Study and Bowling Green Early Warning Wells." Report to New York State, Dept. of Environmental Conservation (NYSDEC) Division of Environmental Remediation (Albany, NY). 83p. SAD 054296 - SAD 054378.

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271	Bonifas, MJ. [Hull & Associates, Inc.]. September 10, 1997. "Letter to C. Vasudevan (NYSDEC) re: Progress Report #16 for August 12 through September 10, 1997 for the Interim Remedial Measure Program (IRM Program) at the NYSDEC Site Code #130043A in Westbury, New York; NMB004D.061." 2p. SAD 043566 - SAD 043567.
272	Merklin, WD. [Dvirka and Bartilucci Consulting Engineers]. September 15, 1997. "Letter to P. Ramirez (Nassau County Department of Health) re: Town of Hempstead Department of Water, Packed Tower Aeration System at Bowling Green Estates Water District Wells 1 and 2, NCDH File #1959-95, D&B No. 1243-Q." 1p. SAD 093255.
273	Hull & Associates, Inc. (Dublin, OH) ; Land Tech Remedial, Inc. (Farmingdale, NY). October 1997. "Work Plan for the Focused Ground-Water Investigation at the 570 Main Street Property, Westbury, New York." Report to IMC Magnetics Corp.. HAI Document #NMB004D.063, 253p.
274	Hull & Associates, Inc. (Dublin, OH) ; Land Tech Remedial, Inc. (Farmingdale, NY). October 1997, April 1998 (Addendum 1)"Work Plan for the Focused Ground-Water Investigation and Focused Ground-Water Feasibility Study at the 570 Main Street Property, Westbury, New York." Report to IMC Magnetics Corp.. HAI Document #NMB004.300.0074 (Addendum 1), 295p.
275	Hull & Associates, Inc. (Dublin, OH) ; Land Tech Remedial, Inc. (Farmingdale, NY). October 1997, May 1998 (Addendum 2)."Work Plan for the Focused Ground-Water Investigation and Focused Ground-Water Feasibility Study at the 570 Main Street Property, Westbury, New York." Report to IMC Magnetics Corp.. HAI Document #NMB004.300.0076 (Addendum 2), 450p. SAD 054737 - SAD 055186.
276	Bonifas, MJ. [Hull & Associates, Inc.]. October 10, 1997. "Letter to C. Vasudevan (NYSDEC) re: Progress Report #17 for September 13 through October 10, 1997 for the Interim Remedial Measure Program (IRM Program) at the NYSDEC Site Code #130043A in Westbury, New York; NMB004D.064." 2p. SAD 043562 - SAD 043563.
277	CA Rich Consultants, Inc. (Sea Cliff, NY). November 1997. "Focused Remedial Investigation Work Plan for On-Site Groundwater, Tishcon Corporation, 30 - 36 New York Avenue and 31 - 33 Brooklyn Avenue, Westbury, New York." Report to Tishcon Corp. (Westbury, NY). 29p. SAD068558 - SAD068586.
278	CA Rich Consultants, Inc. (Sea Cliff, NY). November 1997. "Feasibility Study Letter Report, Tishcon Corporation, 30 - 36 New York Avenue and 31 - 33 Brooklyn Avenue, Westbury, New York." Report to Tishcon Corp. (Westbury, NY). 9p. SAA 159159 - SAA 159167.
279	Anson Environmental Ltd. (Huntington, NY). November 1997 (Revised)"Work Plan, Utility Manufacturing/Wonder King Site, Site ID # 1-30-043H, 700-712 Main Street, Westbury, New York 11590." Report to New York State, Dept. of Environmental Conservation (NYSDEC), Division of Environmental Remediation. 65p. SW 132221 - SW 132285.
280	Bonifas, MJ. [Hull & Associates, Inc.]. November 10, 1997. "Letter to C. Vasudevan (NYSDEC) re: Progress Report #18 for October 11 through November 10, 1997 for the Interim Remedial Measure Program (IRM Program) at the NYSDEC Site Code #130043A in Westbury, New York; NMB004D.066." 2p. SW 120525 - SW 120526.
281	Herbold, IL. [S&W Services, Inc.]. November 17, 1997. "Letter to M. Cosia (NYSDEC) re: Former General Instrument Corporation, 800 West John Street, Hicksville, NY, S&W File No. 70046TR. Addendum to the Operation, Maintenance & Monitoring Manual for the Soil Vapor Extraction System." 5p. SSB 233977 - SSB 233981.
282	Nytest Environmental, Inc. (Port Washington, NY) ; Beyer, L. November 25, 1997. "Analytical Package for Samples Received on 10/29/97 [Ref: Tishcon]." Report to CA Rich Consultants, Inc. (Sea Cliff, NY). 317p. SAD 064517 - SAD 064833.
283	Bonifas, MJ. [Hull & Associates, Inc.]. December 11, 1997. "Letter to C. Vasudevan (NYSDEC) re: Progress Report #19 for November 11 through December 11, 1997 for the Interim Remedial Measure Program (IRM Program) at the NYSDEC Site Code #130043A in Westbury, New York; NMB004D.067." 2p. SAD 090132 - SAD 090133.
284	New York State, Dept. of Environmental Conservation (NYSDEC). December 23, 1997. "Order on consent [In the Matter of the Development and Implementation of a Focussed Remedial Investigation/Feasibility Study for an Inactive Hazardous Waste Disposal Site, Under Article 27, Title 13, and Article 71, Title 27 of the Environmental Conservation Law of the State of New York by Utility Manufacturing Co.]." INDEX # WI-0795-97-06, 16p. BPM 293406 - BPM 293421.
285	New York State, Dept. of Environmental Conservation (NYSDEC). January 8, 1998. "Order on consent [In the Matter of the Development and Implementation of a Focussed Remedial Investigation/Feasibility Study for an Inactive Hazardous Waste Disposal Site, Under Article 27, Title 13, and Article 71, Title 27 of the Environmental Conservation Law of the State of New York by Tishcon Corporation]." INDEX # WI-0799-97-06, 16p. SAA 186452 - SAA 186467.
286	Bonifas, MJ. [Hull & Associates, Inc.]. January 12, 1998. "Letter to C. Vasudevan (NYSDEC) re: Progress Report #20 for December 12, 1997 through January 12, 1998 for the Interim Remedial Measure Program (IRM Program) at the NYSDEC Site Code #130043A in Westbury, New York, NMB004D.068." 2p. SW 120518 - SW 120519.
287	Nytest Environmental, Inc. (Port Washington, NY) ; Beyer, L. January 20, 1998. "Analytical Package for Samples Received on 10/29/97 [Ref: Tishcon]." Report to CA Rich Consultants, Inc. (Sea Cliff, NY). 76p. SAD 064440 - SAD 064515.

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No.	Reference
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289	Stearns & Wheler, LLC (Cazenovia, NY). February 1998. "Phase III Remedial Investigation Addendum, General Semiconductor, Hicksville, New York." Report to General Semiconductor. 40p. SAD 112165 - SAD 112204.
290	Bonifas, MJ. [Hull & Associates, Inc.]. February 10, 1998. "Letter to C. Vasudevan (NYSDEC) re: Progress Report #21 for January 13, 1998 through February 10, 1998 for the Interim Remedial Measure Program (IRM Program) at the NYSDEC Site Code #130043A in Westbury, New York, NMB004D.069." 2p. SAD 043507 - SAD 043508.
291	EcoTest Laboratories, Inc. (N. Babylon, NY). February 25, 1998. "Analytical data [Source of sample: Tishcon]." Report to CA Rich Consultants, Inc. (Plainview, NY). 9p. SAA 184927 - SAA 184935.
292	CA Rich Consultants, Inc. (Sea Cliff, NY). March 1998. "Interim Remedial Measures Final Report, Tishcon Corporation, 30-36 New York Avenue and 31-33 Brooklyn Avenue, Westbury, New York." Report to Tishcon Corp. (Westbury, NY). 95p. SAA 186589 - SAA 186683.
293	CA Rich Consultants, Inc. (Sea Cliff, NY). March 1998. "Interim Remedial Measures Final Report, Tishcon Corporation, 125 State Street, Westbury, New York." Report to Tishcon Corp. (Westbury, NY). 58p. SAD 063968 - SAD 064025.
294	LMS Engineers, LLP (Pearl River, NY). March 1998. "Project Management Plan for Three New Cassel Industrial Area Sites, Remedial Investigation/Feasibility Study." Report to New York State, Dept. of Environmental Conservation (NYSDEC) (Albany, NY). 31p. SSB 006335 - SSB 006365.
295	O'Brien & Gere Engineers, Inc.. March 1998. "Investigation Work Plan, Exhibit B: Former Sylvania Electric Products Incorporated Facility, Cantiague Rock Road, Hicksville, New York." Report to GTE Operations Support Inc.. 476p. SSB 214312 - SSB 214787.
296	Bonifas, MJ. [Hull & Associates, Inc.]. March 11, 1998. "Letter to C. Vasudevan (NYSDEC) re: Progress Report #22 for February 11, 1998 through March 11, 1998 for the Interim Remedial Measure Program (IRM Program) at the NYSDEC Site Code #130043A in Westbury, New York, NMB004D.070." 2p. SW 122892 - SW 122893.
297	Bonifas, MJ. [Hull & Associates, Inc.]. April 10, 1998. "Letter to C. Vasudevan (NYSDEC) re: Progress Report #23 for March 12 through April 10, 1998 for the Interim Remedial Measure Program (IRM Program) at the NYSDEC Site Code #130043A in Westbury, New York; NMB004.300.073.DOC." 2p. SW 121738 - SW 121739.
298	Lehtinen, MD. [Lawler, Matusky & Skelly Engineers LLP]. April 22, 1998. "Letter to J. Jones (NYSDEC) re: New Cassel Industrial Area, Town of North Hempstead, Nassau County (re: Completion of the Preliminary Off-Site Groundwater Immediate Investigation Work Assignment (IIWA))." 8p. SAD 036877 - SAD 036884.
299	Coscia, M. [New York State, Dept. of Environmental Conservation (NYSDEC)]. April 28, 1998. "Letter to L. McKenney (S&W Services, Inc.) re: SVE start-up and monthly operations report, November 24, 1997 - December 31, 1997, Former General Instrument Corp., Site Code 130020." 2p. SDOH 212143 - SDOH 212144.
300	H2M Labs, Inc. (Melville, NY). May 1998. "Analytical Data Package for NYS DEC, Contract No.: C003786, Case No.: RA098, SDG No.: GB14-6. Soil Samples Received May 12, 1998. Sample Data Summary Package." Report to New York State, Dept. of Environmental Conservation (NYSDEC). 42p. SAD 062505 - SAD 062546.
301	H2M Labs, Inc. (Melville, NY). May 1998. "Analytical Data Package for NYS DEC, Contract No.: C003786, Case No.: RA098, SDG No.: GB14-6. Soil Samples Received May 12, 1998. Volatile Data Package." Report to New York State, Dept. of Environmental Conservation (NYSDEC). 159p. SAD 062547 - SAD 062705.
302	O'Brien & Gere Engineers, Inc.. May 1998. "Work Plan: Former Sylvania Electric Products Incorporated Facility, Cantiague Rock Road, Hicksville, New York (Revised)." Report to GTE Operations Support Inc.. 470p. SAR 263473 - SAR 263942.
303	O'Brien & Gere Engineers, Inc.. May 1998 (Revised July 2, 1998)"Investigation Work Plan, Exhibit B: Former Sylvania Electric Products Incorporated Facility, Cantiague Rock Road, Hicksville, New York (Revised May 1998) , including Revised Attachment dated July 2, 1998." Report to GTE Operations Support Inc.. 495p. SSB 214807 - SSB 215301.
304	New York State, Dept. of Environmental Conservation (NYSDEC). May 8, 1998. "Order on consent [In the Matter of the Development and Implementation of a Remedial Program for an Inactive Hazardous Waste Disposal Site, Under Article 27, Title 13, and Article 71, Title 27 of the Environmental Conservation Law of the State of New York by Tishcon Corporation]." INDEX # I-WI-0757-98-02. 15p. BPM 297926 - BPM 297940.
305	New York State, Dept. of Environmental Conservation (NYSDEC). May 8, 1998. "Order on consent [In the Matter of the Development and Implementation of a Remedial Program for Operable Unit 1 of an Inactive Hazardous Waste Disposal Site, Under Article 27, Title 13, and Article 71, Title 27 of the Environmental Conservation Law of the State of New York by Tishcon Corporation]." INDEX # WI-0799-98-02. 15p. SAA 162963 - SAA 162977.
306	Bonifas, MJ. [Hull & Associates, Inc.]. May 11, 1998. "Letter to C. Vasudevan (NYSDEC) re: Progress Report #24 for April 11, 1998 through May 11, 1998 for the Interim Remedial Measure Program (IRM Program) at the NYSDEC Site Code #130043A in Westbury, New York, NMB004D.300.0078.DOC." 2p. SW 121730 - SW 121731.
307	Lawler, Matusky & Skelly Engineers (Pearl River, NY). June 1998. "Updated Health & Safety Plan (HASP) and Quality Assurance Plan (QAPjP) for the New Cassel Industrial Area Site, Frost Street Sites." Report to New York State, Dept. of Environmental Conservation (NYSDEC) (Albany, NY). 33p. SAD 348428 - SAD 348460.

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No.	Reference
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309	Bonifas, MJ. [Hull & Associates, Inc.]. June 10, 1998. "Letter to C. Vasudevan (NYSDEC) re: Progress Report #25 for May 12, 1998 through June 10, 1998 for the Interim Remedial Measure Program (IRM Program) at the NYSDEC Site Code #130043A in Westbury, New York, NMB004.300.0080.DOC." 2p. SAD 043393 - SAD 043394.
310	New York State, Dept. of Environmental Conservation (NYSDEC). June 15, 1998. "Order on consent [In the Matter of the Development and Implementation of a Focussed Remedial Investigation/Focussed Feasibility Study for Operable Unit 2 of an Inactive Hazardous Waste Disposal Site, Under Article 27, Title 13, and Article 71, Title 27 of the Environmental Conservation Law of the State of New York by IMC Eastern Corporation (formerly known as IMC Magnetics Corp.)]." INDEX # I-WI-0750-96-02, 19p. BPM 297068 - BPM 297086.
311	Environmental Testing Laboratories, Inc. (Farmingdale, NY). June 22, 1998. "Report Package of Analytical Data for Utility Manufacturing Facility, Westbury, New York [SDG ANSON-3]." Report to Anson Environmental Ltd.. 126p. SAD 071853 - SAD 071978.
312	CA Rich Consultants, Inc. (Sea Cliff, NY). July 1998. "Hazardous Waste Reduction Plan, Tishcon Corporation, Westbury, New York (Revised)." Report to Tishcon Corp. (Westbury, NY). 4p. SSB246405 - SSB246408.
313	CA Rich Consultants, Inc. (Sea Cliff, NY). July 1998. "Post-Remediation Groundwater Quarterly Monitoring Report, Tishcon Corporation, 125 State Street, Westbury, New York." Report to Tishcon Corp. (Westbury, NY). 10p. SAA 184872 - SAA 184881.
314	CA Rich Consultants, Inc. (Sea Cliff, NY). July 1998. "Remedial Design Investigation Work Plan, Tishcon Corporation, 30 - 36 New York Avenue and 31 - 33 Brooklyn Avenue, Westbury, New York." Report to Tishcon Corp. (Westbury, NY). 27p. SAA 162853 - SAA 162879.
315	LAB Validation Corp. (Northport, NY). July 1998. "Data Validation Report, Organic/Inorganic Analysis, Volatiles, RCRA Metals, For Samples Collected on May 11, 1998 at Tishcon - State Street, Westbury, NY." Report to C.A. Rich Consultants, Inc. (Sea Cliff, NY). 50p. SAD 062793 - SAD 062842.
316	Lawler, Matusky & Skelly Engineers LLP (Pearl River, NY). July 1998. "Work Plan, Remedial Investigation Feasibility Study." Report to New York State, Dept. of Environmental Conservation (NYSDEC), Division of Environmental Remediation (Albany, NY). 141p. BPM 328733 - BPM 328873.
317	Lawler, Matusky & Skelly Engineers LLP (Pearl River, NY). July 1998. "Field Activities Plan, Remedial Investigation Feasibility Study." Report to New York State, Dept. of Environmental Conservation (NYSDEC), Division of Environmental Remediation (Albany, NY). 54p. SAD 076433 - SAD 076486.
318	Bonifas, MJ. [Hull & Associates, Inc.]. July 10, 1998. "Letter to C. Vasudevan (NYSDEC) re: Progress Report #26 for June 11, 1998 through July 10, 1998 for the Interim Remedial Measure Program (IRM Program) at the NYSDEC Site Code #130043A in Westbury, New York, NMB004.300.0081.DOC." 2p. SW 122851 - SW 122852.
319	Lawler, Matusky & Skelly Engineers LLP (Pearl River, NY). August 1998. "Field Activities Plan, Remedial Investigation/Feasibility Study, Arkwin Industries OU2." Report to New York State, Dept. of Environmental Conservation (NYSDEC), Division of Environmental Remediation (Albany, NY). 40p. SAA 154786 - SAA 154825.
320	Lawler, Matusky & Skelly Engineers LLP (Pearl River, NY). August 1998. "Work Plan, Remedial Investigation/Feasibility Study, Arkwin Industries OU2." Report to New York State, Dept. of Environmental Conservation (NYSDEC), Division of Environmental Remediation (Albany, NY). 60p. SAA 154725 - SAA 154784.
321	Lawler, Matusky & Skelly Engineers (Pearl River, NY). August 1998. "Updated Health & Safety Plan (HASP) and Quality Assurance Project Plan (QAPjP) for the New Cassel Industrial Area Site, Arkwin Industries OU2 RI/FS." Report to New York State, Dept. of Environmental Conservation (NYSDEC) (Albany, NY). 32p. SAA 157541 - SAA 157572.
322	Bonifas, MJ. [Hull & Associates, Inc.]. August 7, 1998. "Letter to J. Hussey (NYSDEC) re: Progress Report #1 for June 18 through August 6, 1998 for the Focused Ground-Water Investigation at the NYSDEC Site Code #1-W1-0750-96-02 in Westbury, New York. NMB007.200.0002." 3p. SW 121548 - SW 121550.
323	Turley, WL. [Hull & Associates, Inc.]. August 8, 1998. "Letter to J. Jones (NYSDEC) re: Progress Report #2 for August 7 through September 8, 1998 for the Focused Ground-Water Investigation at the NYSDEC Site Code #1-W1-0750-96-02 in Westbury, New York; NMB007.200.0005." 3p. SAD 043256 - SAD 043258.
324	Bonifas, MJ. [Hull & Associates, Inc.]. August 10, 1998. "Letter to C. Vasudevan (NYSDEC) re: Progress Report #27 for July 11 through August 10, 1998 for the Interim Remedial Measure Program (IRM Program) at the NYSDEC Site Code #130043A in Westbury, New York; NMB004.300.0082.DOC." 2p. SW 122890 - SW 122891.
325	CA Rich Consultants, Inc. (Sea Cliff, NY). September 1998. "Remedial Action Report, Tishcon Corporation, 125 State Street, Westbury, New York." Report to Tishcon Corp. (Westbury, NY). 86p. SSB 031205 - SSB 031286SAD 062998 - SAD 063001.
326	Fanning, Phillips & Molnar (Ronkonkoma, NY). September 1998. "Focussed Remedial Investigation Work Plan for 118-130 Swalm Avenue, New Cassel, New York." Submitted to New York State, Dept. of Environmental Conservation (NYSDEC). 100p. SSB 017775 - SSB 017874.
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Appendix A: List of Documents/Data Sources that USEPA Should Have Relied Upon in Developing CSM

No.	Reference
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329	Hull & Associates, Inc. (Mason, OH). September 1998. "Focused Ground-Water Investigation Report at the 570 Main Street, Manufacturing Facility, Westbury, New York, NYSDEC Site Code #130043A. Volume I." Report to IMC Eastern Corp.. 48p.
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335	Bonifas, MJ. [Hull & Associates, Inc.]. September 10, 1998. "Letter to C. Vasudevan (NYSDEC) re: Progress Report #28 for August 11, 1998 through September 10, 1998 for the Interim Remedial Measure Program (IRM Program) at the NYSDEC Site Code #130043A in Westbury, New York; NMB004.300.083.DOC." 2p. SW 120803 - SW 120804.
336	Walter, A ; Holzmacher, JR. [P.W. Grosser Consulting Engineer & Hydrogeologist, P.C.Kalogeras & Grosser Consulting Engineers, P.C.]. September 11, 1998. "Letter to B. MacKay (Nassau County Department of Health) re: Final closure report for: Sulzer Metco (US), Inc., 1101 Prospect Avenue, Westbury, NY." 5p. SAD356697 - SAD356701.
337	Impact Environmental (Kings Park, NY). September 18, 1998. "Focused Remedial Investigation Work Plan: Site Code # 1-30-043S, 299 Main Street, Westbury, New York. Appendices." Report to 2632 Realty Development Corp. (Westbury, NY). Submitted to New York State, Dept. of Environmental Conservation (NYSDEC). 249p. SAD 079465 - SAD 079713.
338	Impact Environmental (Kings Park, NY). September 18, 1998. "Focused Remedial Investigation Work Plan: 98-335, Site Code # 1-30-043S, 299 Main Street, Westbury, New York." Report to 2632 Realty Development Corp. (Westbury, NY). Submitted to New York State, Dept. of Environmental Conservation (NYSDEC). 297p. SSB 017393 - SSB 017689.
339	Anson Environmental Ltd. (Huntington, NY). October 1998. "Laboratory Analysis, Utility Manufacturing/Wonder King Site, Site ID No. 1-30-043H, 700-712 Main Street, Westbury, New York 11590." Report to New York State, Dept. of Environmental Conservation (NYSDEC), Division of Environmental Remediation. 125p. SAD 072322 - SAD 072446.
340	CA Rich Consultants, Inc. (Sea Cliff, NY). October 1998. "Post-Remediation Groundwater Quarterly Monitoring Report, Tishcon Corporation, 125 State Street, Westbury, New York." Report to Tishcon Corp. (Westbury, NY). 15p. SAD 062902 - SAD 062915.
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342	Fanning, Phillips & Molnar (Ronkonkoma, NY). October 1998. "Focussed Remedial Investigation Work Plan for 118-130 Swalm Avenue, New Cassel, New York." Submitted to New York State, Dept. of Environmental Conservation (NYSDEC). 99p. SSB 017875 - SSB 017973.
343	Anson Environmental Ltd. (Huntington, NY). October 2, 1998, January 21, 1999 (Revised)"Phase One Field Investigation Report, Focused Remedial Investigation to Comply with Work Plan for Utility Manufacturing/Wonder King Site dated November 1997, Site ID No. 1-30-043H, 700-712 Main Street, Westbury, New York 11590." Report to New York State, Dept. of Environmental Conservation (NYSDEC), Division of Environmental Remediation. 246p. SSB 018076 - SSB 018321.
344	Bonifas, MJ. [Hull & Associates, Inc.]. October 12, 1998. "Letter to C. Vasudevan (NYSDEC) re: Progress Report #30 for October 13, 1998 through November 11, 1998 for the Interim Remedial Measure Program (IRM Program) at the NYSDEC Site Code #130043A in Westbury, New York; NMB004.300.0085.DOC." 2p. SW 122730 - SW 122731.
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346	General Consolidated Industries, Inc. (Melville, NY). October 16, 1998. "Focused Remedial Investigation Work Plan, Tishcon Corp., New Cassel Industrial Area, 29 New York Avenue, North Hempstead, New York." Report to New York State, Dept. of Environmental Conservation (NYSDEC). 285p. OAG006915 - OAG007199.

Appendix A: List of Documents/Data Sources that USEPA Should Have Relied Upon in Developing CSM

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348	Lawler, Matusky & Skelly Engineers LLP (Pearl River, NY). November 1998. "Focused Remedial Investigation Report, Former LAKA Industries Site. Volume I: Report and Appendices A-B." Report to New York State, Dept. of Environmental Conservation (NYSDEC), Division of Environmental Remediation (Albany, NY). 141p. SSB 016121 - SSB 016261.
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352	Turley, WL. [Hull & Associates, Inc.]. November 6, 1998. "Letter to J. Jones (NYSDEC) re: Progress Report #3 for October 8 through November 6, 1998 for the Focused Water Investigation at the NYSDEC Site Code-W1-0750-96-02 in Westbury, New York, NMB007.200.0009." 2p. SW 121728 - SW 121729.
353	Buck, L. [Fanning, Phillips and Molnar]. November 11, 1998. "Letter to J. Lovejoy (Nassau County Department of Health) re: Permafuse Site, Westbury, New York, FPM File No. 459-97-01." 13p. SAA 182559 - SAA 182571.
354	Impact Environmental ?. November 23, 1998. "Focused Remedial Investigation Final Work Plan 98-335, Site Code # 1-30-043S, 299 Main Street, Westbury, New York." Report to 2632 Realty Development Corp. (Westbury, NY). Submitted to New York State, Dept. of Environmental Conservation (NYSDEC). 54p. SSB 017337 - SSB 017390.
355	Turley, WL. [Hull & Associates, Inc.]. December 6, 1998. "Letter to J. Jones (NYSDEC) re: Progress Report #4 for November 6 through December 6, 1998 for the Focused Ground-Water Investigation at the NYSDEC Site Code W1-0750-96-02 in Westbury, New York; NMB007.200.0011." 2p. SAD 036767 - SAD 036768.
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357	Phillips, KJ. [Fanning, Phillips and Molnar]. December 22, 1998. "Letter to R. Lilley, Jr. (NYSDEC) re: Permafuse Site, Westbury, New York, FPM File No. 459-97-01." 1p. SAA 182541.
358	Holzmacher, JR. [P.W. Grosser Consulting Engineer & Hydrogeologist, P.C.Kalogeras & Grosser Consulting Engineers, P.C.]. December 23, 1998. "Letter to B. Mackay (Nassau County Department of Health) re: Sulzer Metco (US) Inc., 1101 Prospect Avenue, floor drain and discharge point documentation." 3p. SAD356704 - SAD356706.
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361	H2M Labs, Inc. (Melville, NY). January 1999. "Analytical Data Package for New York State Department of Environmental Conservation, Region 0, Case No.: RA098, SDG No.: X0118. Soil & Water Samples Received 1/19-1/29/99. Sample Data Summary Package." Report to New York State, Dept. of Environmental Conservation (NYSDEC). 9p. SAD 037200 - SAD 037208.
362	Lawler, Matusky & Skelly Engineers LLP (Pearl River, NY) ; Lehtinen, M. January 5, 1999. "Letter Report to R. Lilley (NYSDEC) re: Upgradient Soil Sampling & Additional Monitoring Well Sampling." 199p. SAA 077229 - SAA 077427.
363	Lilley, RJ Jr.. [New York State, Dept. of Environmental Conservation (NYSDEC)]. January 6, 1999. "Letter to P. Dermody (Fanning, Phillips & Molnar) re: Permafuse Site, 675 Main Street Westbury, New York." 1p. SAD 037199.
364	Turley, WL. [Hull & Associates, Inc.]. January 8, 1999. "Letter to J. Jones (NYSDEC) re: Progress Report #5 for December 6, 1998 through January 8, 1999 for the Focused Ground-Water Investigation at the NYSDEC Site Code W1-0750-96-02 in Westbury, New York; NMB007.200.0012." 2p. SW 122347 - SW 122348.
365	Lancaster Laboratories (Lancaster, PA). January 11, 1999. "Data Package - IMC Magnetics, 507 Main St., Westbury, NJ. Water Samples Collected on 11/24/1998. Sample No. 3047375-3047376." Report to Hull & Associates, Inc.. 192p. SSB 020519 - SSB 020710.

Appendix A: List of Documents/Data Sources that USEPA Should Have Relied Upon in Developing CSM

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369	Lawler, Matusky & Skelly Engineers LLP (Pearl River, NY). February 1999. "Work Plan, Remedial Investigation/Feasibility Study, New Cassel Industrial Area Offsite Groundwater." Report to New York State, Dept. of Environmental Conservation (NYSDEC), Division of Environmental Remediation (Albany, NY). 66p. SAD 088845 - SAD 088910.
370	Turley, WL. [Hull & Associates, Inc.]. February 8, 1999. "Letter to J. Jones (NYSDEC) re: Progress Report #6 for January 8, 1999 through February 8, 1999 for the Focused Ground-Water Investigation and Feasibility Study at the NYSDEC Site Code W1-0750-96-02 in Westbury, New York; NMB007.200.0015." 2p. SAD 043509 - SAD 043510.
371	Bonifas, MJ. [Hull & Associates, Inc.]. February 10, 1999. "Letter to C. Vasudevan (NYSDEC) re: Progress Report #33 for January 12, 1999 through February 10, 1999 for the Interim Remedial Measure Program (IRM Program) at the NYSDEC Site Code #130043A in Westbury, New York; NMB004.300.0088." 2p. SW 122862 - SW 122863.
372	H2M Labs, Inc. (Melville, NY). March 1999. "Analytical Data Package for NYS DEC, Contract No.: C003786, Case No.: RA098, SDG No.: 0127C. Soil Samples Received March 16 & 21, 1999. Sample Data Summary Package." Report to New York State, Dept. of Environmental Conservation (NYSDEC). 62p. SAA 175132 - SAA 175193.
373	H2M Labs, Inc. (Melville, NY). March 1999. "Analytical Data Package for NYS DEC, Contract No.: C003786, Case No.: RA098, SDG No.: 0127C. Soil Samples Received March 16 & 21, 1999. Volatile Data Package." Report to New York State, Dept. of Environmental Conservation (NYSDEC). 225p. SAA 175468 - SAA 175692.
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375	Lawler, Matusky & Skelly Engineers LLP (Pearl River, NY). March 1999. "Focused Remedial Investigation Report, Arkwin Industries Volume I: Report and Appendices A-F." Report to New York State, Dept. of Environmental Conservation (NYSDEC), Division of Environmental Remediation (Albany, NY). 182p. SAD 064981 - SAD 065162.
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383	New York State, Dept. of Environmental Conservation (NYSDEC). March 26, 1999. "Order on consent [In the Matter of Development and Implementation of a Focussed Remedial Investigation/Focussed Feasibility Study for an Inactive Hazardous Waste Disposal Site, Under Article 27, Title 13, and Article 71, Title 27 of the Environmental Conservation Law of the State of New York by Equity Share I Associates]." INDEX # WI-0828-98-05. 16p. BPM 296384 - BPM 296399.
384	CA Rich Consultants, Inc. (Sea Cliff, NY). April 1999. "Post-Remediation Groundwater Quarterly Monitoring Report, Tishcon Corporation, 125 State Street, Westbury, New York." Report to Tishcon Corp. (Westbury, NY). 14p. SSB 004390 - SSB 004403.
385	H2M Labs, Inc. (Melville, NY). April 1999. "Analytical Data Package for NYS DEC, Contract No.: C003786, Case No.: RA098, SDG No.:0127B. Soil Samples Received April 15, 1999. TCLP Wet Chemistry Data Package." Report to New York State, Dept. of Environmental Conservation (NYSDEC). 13p. SAA 172747 - SAA 172759.
386	H2M Labs, Inc. (Melville, NY). April 1999. "Analytical Data Package for New York State Department of Environmental Conservation, Region 1, Case No.: RA098, SDG No.: 0127A. Water Samples Received 4/15 & 4/16/99. Volatile Data." Report to New York State, Dept. of Environmental Conservation (NYSDEC). 322p. SAA 179238 - SAA 179559.
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388	H2M Labs, Inc. (Melville, NY). April 1999. "Analytical Data Package for NYS DEC, Contract No.: C003786, Case No.: RA-098, SDG No.: 0127. Water Samples Received April 13 & 15, 1999. Sample Data Summary Package." Report to New York State, Dept. of Environmental Conservation (NYSDEC). 86p. SAA 178737 - SAA 178822.
389	H2M Labs, Inc. (Melville, NY). April 1999. "Analytical Data Package for NYS DEC, Contract No.: C003786, Case No.: RA098, SDG No.: 0127B. Soil Samples Received April 15, 1999. TCLP Herbicides Data Package." 87p. SAA 174207 - SAA 174293.
390	H2M Labs, Inc. (Melville, NY). April 1999. "Analytical Data Package for NYS DEC, Contract No.: C003786, Case No.: RA098, SDG No.: 0127B. Soil Samples Received April 15, 1999. TCLP Metals Data Package." Report to New York State, Dept. of Environmental Conservation (NYSDEC). 167p. SAA 175300 - SAA 175466.
391	H2M Labs, Inc. (Melville, NY). April 1999. "Analytical Data Package for NYS DEC, Contract No.: C003786, Case No.: RA098, SDG No.: 0127B. Soil Samples Received April 15, 1999. TCLP Pesticides Data Package." 171p. SAA 173820 - SAA 173990.
392	H2M Labs, Inc. (Melville, NY). April 1999. "Analytical Data Package for NYS DEC, Contract No.: C003786, Case No.: RA-098, SDG No.: 0127. Water Samples Received April 13 & 15, 1999. Volatiles Data Package." Report to New York State, Dept. of Environmental Conservation (NYSDEC). 387p. SAA 173433 - SAA 173819.
393	H2M Labs, Inc. (Melville, NY). April 1999. "Analytical Data Package for New York State Department of Environmental Conservation, Region 1, Case No.: RA098, SDG No.: 0127A. Water Samples Received 4/15 & 4/16/99. Sample Data Summary Package." Report to New York State, Dept. of Environmental Conservation (NYSDEC). 80p. SAA 174127 - SAA 174206.
394	H2M Labs, Inc. (Melville, NY). April 1999. "Analytical Data Package for NYS DEC, Contract No.: C003786, Case No.: RA-098, SDG No.: 0127. Water Samples Received April 13 & 15, 1999. Volatiles Data Package." Report to New York State, Dept. of Environmental Conservation (NYSDEC). 387p. SAA 173433 - SAA 173819.
395	H2M Labs, Inc. (Melville, NY). April 1999. "Analytical Data Package for NYS DEC, Contract No.: C003786, Case No.: RA098, SDG No.: 0127B. Soil Samples Received April 15, 1999. TCLP Volatiles Data Package." Report to New York State, Dept. of Environmental Conservation (NYSDEC). 106p. SAA 175194 - SAA 175299.
396	Bonifas, MJ. [Hull & Associates, Inc.]. April 9, 1999. "Letter to C. Vasudevan (NYSDEC) re: Progress Report #35 for March 11, 1999 through April 9, 1999 for the Interim Remedial Measure Program (IRM Program) at the NYSDEC Site Code #130043A in Westbury, New York; NMB004.300.0093." 2p. SW 122849 - SW 122850.
397	Fanning, Phillips & Molnar (Ronkonkoma, NY). May 1999. "Focussed Remedial Investigation Report for 118-130 Swalm Street, New Cassel, New York." Submitted to New York State, Dept. of Environmental Conservation (NYSDEC). 65p. SAD 085452 - SAD 085515.
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399	Lawler, Matusky & Skelly Engineers LLP (Pearl River, NY). May 1999. "Focused Feasibility Study Report, Former LAKA Industries Site." Report to New York State, Dept. of Environmental Conservation (NYSDEC), Division of Environmental Remediation (Albany, NY). 22p. SSB 016263 - SSB 016284.
400	Bonifas, MJ. [Hull & Associates, Inc.]. May 11, 1999. "Letter to C. Vasudevan (NYSDEC) re: Progress Report #36 for April 10, 1999 through May 11, 1999 for the Interim Remedial Measure Program (IRM Program) at the NYSDEC Site Code #130043A in Westbury, New York; NMB004.300.0094." 2p. SAD 043193 - SAD 043194.

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402	Lawler, Matusky & Skelly Engineers LLP (Pearl River, NY). June 1999. "Feasibility Study Report, Arkwin Industries Site." Report to New York State, Dept. of Environmental Conservation (NYSDEC), Division of Environmental Remediation (Albany, NY). 139p. SAA 156110 - SAA 156248.
403	New York State, Dept. of Environmental Conservation (NYSDEC). June 1999. "Record of Decision, National Heatset Printing Site, Town of Babylon, Suffolk County, New York." 73p.
404	Bonifas, MJ. [Hull & Associates, Inc.]. June 10, 1999. "Letter to C. Vasudevan (NYSDEC) re: Progress Report #37 for May 12, 1999 through June 10, 1999 for the Interim Remedial Measure Program (IRM Program) at the NYSDEC Site Code #130043A in Westbury, New York; NMB004.300.0095." 2p. SW 122740 - SW 12741.
405	Turley, WL. [Hull & Associates, Inc.]. June 10, 1999. "Letter to J. Jones (NYSDEC) re: Progress Report #10 for May 10, 1999 through June 10, 1999 for the Focused Ground-Water Investigation and Feasibility Study at the NYSDEC Site Code W1-0750-96-02 in Westbury, New York; NMB007.200.0020." 2p. SW 122742 - SW 122743.
406	Chemtech (Englewood, NJ). June 30, 1999. "Data Package for Volatile Organics, 29 New York Avenue." Report to GCI, Inc.. 194p. SAA 172029 - SAA 172287.
407	CA RICH Consultants, Inc. (Sea Cliff, NY). July 1999. "Remedial Investigation for On-Site Ground Water, Tishcon Corporation, 30-36 New York Avenue and 31-33 Brooklyn Avenue, Westbury, New York." Report to Tishcon Corporation (Westbury, NY). 154p. SSB 031785 - SSB 031938.
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412	Chemtech (Englewood, NJ). July 10, 1999. "Data Package for PP Metals & TPH, Part III, 29 New York Avenue." Report to GCI, Inc.. 202p. SAA 171786 - SAA 171987.
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414	Dermody, P. [Fanning, Phillips and Molnar]. July 12, 1999. "Letter to R. Gaborow (NYS Department of Environmental Conservation) re: 118-130 Swalm Street, New Cassel, New York, FPM File No. 486-98-03." 9p. SAD 050609 - SAD 050617.
415	Turley, WL. [Hull & Associates, Inc.]. July 13, 1999. "Letter to J. Jones (NYSDEC) re: Progress Report #11 for June 10, 1999 through July 13, 1999 for the Focused Ground-Water Investigation and Feasibility Study at the NYSDEC Site Code W1-0750-96-02 in Westbury, New York; NMB007.200.0022." 2p. SAD 036719 - SAD 036720.
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417	CA Rich Consultants, Inc. (Sea Cliff, NY). August 1999. "On-Site Remedial Design Report, Tishcon Corporation, 30 - 36 New York Avenue and 31 - 33 Brooklyn Avenue, Westbury, New York." Report to Tishcon Corp. (Westbury, NY). 94p. SAD068463 - SAD068556.
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Appendix A: List of Documents/Data Sources that USEPA Should Have Relied Upon in Developing CSM

No.	Reference
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425	Parrish, R. [Impact Environmental Consulting, Inc.]. August 31, 1999. "Letter to A. Ruepp (New York State Department of Environmental Conservation) re: 299 Main Street Site No. 1-30-043S, Notice of Completion/Work Schedule." 3p. SAD 051484 - SAD 051486.
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432	Turley, WL. [Hull & Associates, Inc.]. September 9, 1999. "Letter to J. Jones (NYSDEC) re: Progress Report #13 for August 12, 1999 through September 9, 1999 for the Focused Ground-Water Investigation and Feasibility Study at the NYSDEC Site Code W1-0750-96-02 in Westbury, New York; NMB007.200.0024." 2p. SAD 036717 - SAD 036718.
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435	CA Rich Consultants, Inc. (Sea Cliff, NY). October 1999. "Post-Remediation Groundwater Monitoring Report, Tishcon Corporation, 125 State Street, Westbury, New York." Report to Tishcon Corp. (Westbury, NY). 20p. SAD 045069 - SAD 045088.
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No.	Reference
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443	Lawler, Matusky & Skelly Engineers LLP. October 1999. "New Cassel Industrial Area Offsite Groundwater RI/FS, Workplan Amendment #1." 56p. SAD 036954 - SAD 037009.
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446	Bonifas, MJ. [Hull & Associates, Inc.]. October 11, 1999. "Letter to C. Vasudevan (NYSDEC) re: Progress Report #41 for September 11, 1999 through October 11, 1999 for the Interim Remedial Measure Program (IRM Program) at the NYSDEC Site Code #130043A in Westbury, New York; NMB004.300.0099." 2p. SAD 043184 - SAD 043185.
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449	Lawler, Matusky & Skelly Engineers LLP. October 28, 1999. "New Cassel Industrial Area Offsite Groundwater RI/FS, Workplan Amendment #1." 73p. BPM 313577 - BPM 313649.
450	Hull & Associates, Inc. (Mason, OH). November 1999. "Focused Ground-Water Feasibility Study for the 570 Main Street Manufacturing Facility, Westbury, New York, NYSDEC Site Code #130043A (Revised)." Report to IMC Eastern Corporation. 93p.
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452	Turley, WL. [Hull & Associates, Inc.]. November 11, 1999. "Letter to J. Jones (NYSDEC) re: Progress Report #15 for October 11, 1999 through November 11, 1999 for the Focused Ground-Water Investigation and Feasibility Study at the NYSDEC Site Code W1-0750-96-02 in Westbury, New York; NMB007.200.0027." 2p. SW 117493 - SW 117494.
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456	Turley, WL. [Hull & Associates, Inc.]. December 13, 1999. "Letter to J. Jones (NYSDEC) re: Progress Report #16 for November 11, 1999 through December 13, 1999 for the Focused Ground-Water Investigation and Feasibility Study at the NYSDEC Site Code W1-0750-96-02 in Westbury, New York; NMB007.200.0028." 2p. SAD 043175 - SAD 043176.
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458	General Consolidated Industries, Inc. (Hauppauge, NY). January 2000. "Focused Remedial Investigation Report, Tishcon Corporation, New Cassel Industrial Area, 29 New York Avenue, New Cassel, New York 11590." Report to New York State, Dept. of Environmental Conservation (NYSDEC). 115p. SAD 347921 - SAD 348035.
459	H2M Labs, Inc. (Melville, NY). January 2000. "Analytical Data Package for New York State Department of Environmental Conservation, Region 1, Case No.: RA000, SDG No.: 0120. Water Samples, Samples Received 1/21 &1/25/00. Sample Data Summary Package." Report to New York State, Dept. of Environmental Conservation (NYSDEC). 68p. SAA 177294 - SAA 177361.
460	H2M Labs, Inc. (Melville, NY). January 2000. "Analytical Data Package for New York State Department of Environmental Conservation, Region 1, Case No.: RA000, SDG No.: 0120. Water Samples, Samples Received 1/21 & 1/25/00. Volatile Data." Report to New York State, Dept. of Environmental Conservation (NYSDEC). 319p. SAA 176890 - SAA 177208.

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462	H2M Labs, Inc. (Melville, NY). January 2000. "Analytical Data Package for New York State Department of Environmental Conservation, Region 1, Case No.: RA000, SDG No.: 0110. Water Samples, Samples Received 1/11, 1/13, 1/14 & 1/18/00. Metals Data." 150p. SAA 177890 - SAA 178039.
463	H2M Labs, Inc. (Melville, NY). January 2000. "Analytical Data Package for New York State Department of Environmental Conservation, Region 1, Case No.: RA000, SDG No.: 0110. Water Samples, Samples Received 1/11, 1/13, 1/14 & 1/18/00. Sample Data Summary Package." Report to New York State, Dept. of Environmental Conservation (NYSDEC). 246p. SAA 179682 - SAA 179927.
464	H2M Labs, Inc. (Melville, NY). January 2000. "Analytical Data Package for New York State Department of Environmental Conservation, Region 1, Case No.: RA000, SDG No.: 0110. Water Samples, Samples Received 1/11, 1/13, 1/14 & 1/18/00. Wet Chemistry Data." Report to New York State, Dept. of Environmental Conservation (NYSDEC). 145p. SAA 178040 - SAA 178184.
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466	Stearns & Wheler, LLC (Cazenovia, NY). January 2000. "Groundwater Sampling Results, November 1999 Event, General Semiconductor, Inc., Hicksville, New York." Submitted to New York State, Dept. of Environmental Conservation (NYSDEC). 32p. SSB 197005 - SSB 197036.
467	Turley, WL. [Hull & Associates, Inc.]. January 10, 2000. "Letter to J. Jones (NYSDEC) re: Progress Report #17 for December 13, 1999 through January 10, 2000 for the Focused Ground-Water Investigation and Feasibility Study at the NYSDEC Site Code W1-0750-96-02 in Westbury, New York; NMB007.200.0030." 2p. SW 118069 - SW 118070.
468	Bonifas, MJ. [Hull & Associates, Inc.]. January 11, 2000. "Letter to C. Vasudevan (NYSDEC) re: Progress Report #44 for December 11, 1999 through January 11, 2000 for the Interim Remedial Measure Program (IRM Program) at the NYSDEC Site Code #130043A in Westbury, New York; NMB004.300.0102.DOC." 2p. SW 121664 - SW 121665.
469	H2M Labs, Inc. (Melville, NY). February 2000. "Analytical Data Package for NYS DEC, Region 1, Contract No.: C003786, Case No.: RA000, SDG No.: 0128T. Soil Samples Received February 10, 2000. Sample Data Summary Package." Report to New York State, Dept. of Environmental Conservation (NYSDEC). 63p. SAA 178361 - SAA 178423.
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471	H2M Labs, Inc. (Melville, NY). February 2000. "Analytical Data Package for NYS DEC, Region 1, Contract No.: C003786, Case No.: RA000, SDG No.: 0128T. Soil Samples Received February 10, 2000. TCLP Metals Data Package." 142p. SAA 176081 - SAA 176222.
472	H2M Labs, Inc. (Melville, NY). February 2000. "Analytical Data Package for NYS DEC, Region 1, Contract No.: C003786, Case No.: RA000, SDG No.: 0128T. Soil Samples Received February 10, 2000. TCLP Pesticides/PCBs Data Package." 187p. SAA 176703 - SAA 176889.
473	H2M Labs, Inc. (Melville, NY). February 2000. "Analytical Data Package for NYS DEC, Region 1, Contract No.: C003786, Case No.: RA000, SDG No.: 0128T. Soil Samples Received February 10, 2000. TCLP Semivolatiles Data Package." 89p. SAA 175992 - SAA 176080.
474	H2M Labs, Inc. (Melville, NY). February 2000. "Analytical Data Package for NYS DEC, Region 1, Contract No.: C003786, Case No.: RA000, SDG No.: 0128T. Soil Samples Received February 10, 2000. TCLP Volatiles Data Package." Report to New York State, Dept. of Environmental Conservation (NYSDEC). 102p. SAA 176348 - SAA 176449.
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479	CA Rich Consultants, Inc. (Plainview, NY). March 2000. "Final Engineering Report and Operations & Maintenance Manual, Soil Vapor Extraction and Air Sparging System, Tishcon Corporation, 30 - 36 New York Avenue and 31 - 33 Brooklyn Avenue, Westbury, New York." Report to Tishcon Corp. (Westbury, NY). 120p. SAD0068060 - SAD068179.

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No.	Reference
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482	New York State, Dept. of Environmental Conservation (NYSDEC). March 17, 2000. "Order on consent [In the Matter of the Development and Implementation of a Focused Remedial Investigation/Focused Feasibility Study for an Inactive Hazardous Waste Disposal Site, Under Article 27, Title 13, and Article 71, Title 27 of the Environmental Conservation Law of the State of New York by Grand Machinery Exchange, Inc.]." INDEX # W1-0863-00-01, 16p. BPM 295859 - BPM 295874.
483	CA Rich Consultants, Inc. (Plainview, NY). April 2000. "First Quarter 2000 Quarterly Monitoring Report, Soil Vapor Extraction and Air Sparging System, Tishcon Corporation, 30 - 36 New York Avenue and 31 - 33 Brooklyn Avenue, Westbury, New York." Report to Tishcon Corp. (Westbury, NY). 56p. SAD068181 - SAD068236.
484	Bonifas, MJ. [Hull & Associates, Inc.]. April 10, 2000. "Letter to C. Vasudevan (NYSDEC) re: Progress Report #47 for March 11, 2000 through April 10, 2000 for the Interim Remedial Measure Program (IRM Program) at the NYSDEC Site Code #130043A in Westbury, New York; NMB004.300.0105.DOC." 2p. SAD 122517 - SAD 122518.
485	Bonifas, MJ. [Hull & Associates, Inc.]. April 10, 2000. "Letter to C. Vasudevan (NYSDEC) re: Progress Report #50 for July 10, 2000 through August 10, 2000 for the Interim Remedial Measure Program (IRM Program) at the NYSDEC Site Code #130043A in Westbury, New York; NMB004.300.0109.DOC." 2p. SAD 043122 - SAD 043123.
486	Turley, WL. [Hull & Associates, Inc.]. April 10, 2000. "Letter to J. Jones (NYSDEC) re: Progress Report #20 for March 13, 2000 through April 10, 2000 for the Focused Ground-Water Investigation and Feasibility Study at the NYSDEC Site Code W1-0750-96-02 in Westbury, New York; NMB007.200.0033." 2p. SAD 036013 - SAD 036014.
487	FPM Group (Ronkonkoma, NY). May 2000. "Supplemental Focussed Remedial Investigation Report for the Property Located at 118-130 Swalm Street, Westbury, New York." Report to New York State, Dept. of Environmental Conservation (NYSDEC). 149p. SAD 085623 - SAD 085771.
488	FPM Group (Ronkonkoma, NY). May 2000. "Supplemental Focussed Remedial Investigation Report for the Property Located at 118-130 Swalm Street, Westbury, New York." Report to New York State, Dept. of Environmental Conservation (NYSDEC). 149p. SAD 085623 - SAD 058623.
489	Stearns & Wheler, LLC (Cazenovia, NY). May 2000. "Groundwater Sampling Results, November 1999 Event, General Semiconductor, Inc., Hicksville, New York (Revised)." Submitted to New York State, Dept. of Environmental Conservation (NYSDEC). 44p. SAD 112232 - SAD 112275.
490	Impact Environmental Consulting, Inc.. May 1, 2000. "Focussed Remedial Investigation Draft Work Plan 00-096, Site Code # 1-30-043U, 36 Sylvester Street, Westbury, New York." Report to Grand Machinery Exchange, Inc. (New York, NY). Submitted to New York State, Dept. of Environmental Conservation (NYSDEC). 161p. GME-000066 - GME-000226.
491	Bonifas, MJ. [Hull & Associates, Inc.]. May 10, 2000. "Letter to C. Vasudevan (NYSDEC) re: Progress Report #48 for April 10, 2000 through May 10, 2000 for the Interim Remedial Measure Program (IRM Program) at the NYSDEC Site Code #130043A in Westbury, New York; NMB004.300.0106.DOC." 2p. SW 121638 - SW 121639.
492	Turley, WL. [Hull & Associates, Inc.]. May 15, 2000. "Letter to J. Jones (NYSDEC) re: Progress Report #21 for April 10, 2000 through May 15, 2000 for the Focused Ground-Water Investigation and Feasibility Study at the NYSDEC Site Code W1-0750-96-02 in Westbury, New York; NMB007.200.0034." 2p. SSB 003799 - SSB 003800.
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497	Kleaka, K. [Impact Environmental Consulting, Inc.]. June 26, 2000. "Letter to R. Lilley (New York State Department of Environmental Conservation) re: 36 Sylvester Street Site No. 1-30-043U, Draft FRI Work Plan." 4p. SAD 052203 - SAD 052206.

Appendix A: List of Documents/Data Sources that USEPA Should Have Relied Upon in Developing CSM

No.	Reference
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501	Stearns & Wheler, LLC (Cazenovia, NY). July 2000. "Groundwater Sampling Results, June 2000 Event, General Semiconductor, Inc., Hicksville, New York." Submitted to New York State, Dept. of Environmental Conservation (NYSDEC). 25p. SAD 112206 - SAD 112230.
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512	O'Brien & Gere Engineers, Inc.. August 14, 2000. "Investigative Report: Former Sylvania Electric Products Incorporated Facility, Cantiague Rock Road, Hicksville, New York (Revision 1)." Report to GTE Operations Support Inc.. 683p. SAD 105564 - SAD 106246.
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523	Chemtech (Edison, NJ). September 1, 2000. "Data Package for General Chemistry, Part IV, 29 New York Avenue." Report to GCI, Inc.. 27p. SAD 083041 - SAD 083067.
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531	Turley, WL. [Hull & Associates, Inc.]. October 9, 2000. "Letter to J. Jones (NYSDEC) re: Progress Report #26 for September 11, 2000 through October 9, 2000 for the Focused Ground-Water Investigation and Feasibility Study at the NYSDEC Site Code W1-0750-96-02 in Westbury, New York; NMB007.200.0043." 2p. SAD 035983 - SAD 035984.
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535	Thomas, DA. [Hull & Associates, Inc.]. November 10, 2000. "Letter to C. Vasudevan (NYSDEC) re: Progress Report #54 for October 10, 2000 through November 10, 2000 for the Interim Remedial Measure Program (IRM Program) at the NYSDEC Site Code #130043A in Westbury, New York; NMB004.300.0112.DOC." 2p. SW 122271 - SW 122272.
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538	O'Brien & Gere Engineers, Inc.. December 2000. "Investigative Report: Former Sylvania Electric Products Incorporated Facility, Cantiague Rock Road, Hicksville, New York (Revision 2)." Report to GTE Operations Support Inc.. 679p. SW 146987 - SW 147048SAR 254028 - SAR 254644.
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545	Stearns & Wheler, LLC (Cazenovia, NY). February 2001. "Groundwater Sampling Results, November 2000 Event, General Semiconductor, Inc., Hicksville, New York." 20p. SAD 112327 - SAD 112346.
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571	O'Brien & Gere Engineers, Inc.. July 2001. "Supplemental Investigative Report: Former Sylvania Electric Products, Inc. Facility, Cantiague Rock Road, Hicksville, New York (Revision 1)." Report to GTE Operations Support Inc.. 391p. SDOH 247318 - SDOH 247708.
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582	Dermody, P. [Enviroscience Consultants, Inc.]. September 4, 2001. "Letter to J. Jones (NYSDEC) re: 118-130 Swalm Street, Westbury, NY, NYSDEC Site No. 1-30-043P." 9p. Albem-Review0002855 - Albem-Review0002861;SW 140366 - SW 140367.
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595	Stearns & Wheler, LLC (Hyannis, MA). November 2001. "Off-Site Groundwater Investigation (Phase IV) and Semi Annual Sampling Event, July 2001, General Semiconductor, Inc., Hicksville, New York." Submitted to New York State, Dept. of Environmental Conservation (NYSDEC). 29p. SAD 112347 - SAD 112375.
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Appendix A: List of Documents/Data Sources that USEPA Should Have Relied Upon in Developing CSM

No.	Reference
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600	CA Rich Consultants, Inc. (Plainview, NY). December 2001. "Interim Remedial Measures Report and Operations & Maintenance Manual, Utility Manufacturing Company, 700 Main Street, Westbury, New York." Report to Utility Manufacturing Co. (Westbury, NY). 192p. SAD 072943 - SAD 072945SSB 018326 - SSB 018514.
601	New York State, Dept. of Environmental Conservation (NYSDEC). December 5, 2001. "Order on consent [In the Matter of the Development and Implementation of a Remedial Program for Operable Unit 2 of an Inactive Hazardous Waste Disposal Site, Under Article 27, Title 13, and Article 71, Title 27 of the Environmental Conservation Law of the State of New York by Tishcon Corporation]." INDEX # WI-0799-00-03. 66p. SW 128299 - SW 128364.
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607	Chemtech (Mountainside, NJ). 2002. "Supporting data for Utility Manufacturing." 76p.
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610	Dillon Consulting Ltd.. January 2002. "Geophysical Surveys, Former GTE Sylvania Facility, Hicksville, New York." Report to URS Corporation. 24p. SAD 107856-SAD 107879.
611	Stearns & Wheler, LLC (Cazenovia, NY). January 2002. "Draft Groundwater IRM Ozone Injection System Design Report, Vishay General Semiconductor, Hicksville, New York." Report to Vishay General Semiconductor, Inc.. 108p. SSB 237449 - SSB 237556.
612	Finan, JD. [Hull & Associates, Inc.]. January 10, 2002. "Letter to C. Vasudevan (NYSDEC) re: Progress Report #68 for December 10, 2001 through January 10, 2002 for the Interim Remedial Measure Program (IRM Program) at the NYSDEC Site Code #130043A in Westbury, New York; NMB004.300.0127.DOC." 2p. SAD 042979 - SAD 042980.
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614	Davis, SO. [FPM Group]. January 15, 2002. "Letter to J. Jones (NYSDEC) re: Addendum to November 2000 groundwater remediation work plan, Arkwin Industries, Inc., Westbury, New York, FPM File No. 652-00-03." 7p. SAD 066523 - SAD 066529.
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622	Severn Trent Services ; Curran, JC. February 25, 2002. "SDG Narrative, Project ID: Hicksville-SVE." Report to S&W Services. 3p. SAD 112389 - SAD 112391.
623	New York State, Dept. of Environmental Conservation (NYSDEC). February 26, 2002. "Order on consent [In the Matter of the Development and Implementation of a Remedial Program for Operable Unit 2 Inactive Hazardous Waste Disposal Site, Under Article 27, Title 13, and Article 71, Title 27 of the Environmental Conservation Law of the State of New York by Arkwin Industries, Inc.]." INDEX # WI-0861-00-02. 70p. SW 127369 - SW 127438.
624	URS Corp.. February 28, 2002. "Monitoring Well Installation and Ground Water Investigation, Former Sylvania Electric Products, Incorporated Facility, Cantiague, Rock Road, Hicksville, New York." Report to GTE Operations Support Inc.. 117p. SAR 267321-SAR 267437.
625	URS Corp.. February 28, 2002. "Monitoring Well Installation and Ground Water Investigation, Former Sylvania Electric Products, Incorporated Facility, Cantiague, Rock Road, Hicksville, New York." Report to GTE Operations Support Inc.. 119p. SSB 191111 - SSB 191229.
626	URS Corporation; Envirocon, Inc.; MHF Logistical Solutions, Inc.; Envirocare of Utah, Inc.. March 2002. "Soil Remediation Program Work Plan, Former Sylvania Electric Products Facility, Hicksville, New York." Report to GTE Operations Support Inc.. 322p. SAR 255094-SAR 255415.
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628	Turley, WL. [Hull & Associates, Inc.]. March 11, 2002. "Letter to J. Jones (NYSDEC) re: Progress Report #6 for February 10, 2002 through March 10, 2002 for the Focused Groundwater Remediation at the NYSDEC Site Code #130043A in Westbury, New York (Site); NMB008.200.0014." 2p. SAD 042970 - SAD 042971.
629	CA Rich Consultants, Inc. (Plainview, NY). April 2002. "Quarterly Monitoring Report, First Quarter 2002, Utility Manufacturing Company, 700 Main Street, Westbury, New York." Report to Utility Manufacturing Co. (Westbury, NY). 73p. SAD 073619 - SAD 073691.
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631	Impact Environmental ; Allen, J ; Kleaka, KC. April 2002. "Interim Remedial Measures Work Plan Approved for: 36 Sylvester Street Site, Site Code 1-30-043U, Westbury, New York (Final)." Report to New York State, Dept. of Environmental Conservation (NYSDEC). 140p. SAD 080447 - SAD 080586.
632	Stearns & Wheler, LLC (Cazenovia, NY). April 2002. "Groundwater IRM Ozone Injection System Design Report, General Semiconductor, Inc., Hicksville, New York." Report to General Semiconductor, Inc.. 194p. SAD 112430 - SAD 112623.
633	Finan, JD. [Hull & Associates, Inc.]. April 10, 2002. "Letter to C. Vasudevan (NYSDEC) re: Progress Report #71 for March 10, 2002 through April 10, 2002 for the Interim Remedial Measure Program (IRM Program) at the NYSDEC Site Code #130043A in Westbury, New York; NMB004.300.0130.DOC." 2p. SSB 002956 - SSB 002957.
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635	Robins, KS. [Dvirka and Bartilucci Consulting Engineers]. April 29, 2002. "Letter to J. Jones (New York State Department of Environmental Conservation) re: New Cassel Industrial Area, off-site groundwater monitoring and assessment program, Work Assignment No. D003600-25, D&B No. 1898." 3p. SAD 087666 - SAD 087668.
636	CA Rich Consultants, Inc. (Plainview, NY). May 2002. "Quarterly Monitoring Report, First Quarter 2002, Soil Vapor Extraction and Air Sparging System, Tishcon Corporation, 30 - 36 New York Avenue and 31 - 33 Brooklyn Avenue, Westbury, New York." Report to Tishcon Corp. (Westbury, NY). 79p. SAD068832 - SAD068910.
637	Hull & Associates, Inc. (Mason, OH). May 2002. "Focused Groundwater Remediation Report for the 570 Main Street Property, Westbury New York (NYSDEC Site Code #130043A). Volume I of V." Report to IMC Eastern Corp. (Chatsworth, CA). 236p.
638	Hull & Associates, Inc. (Mason, OH). May 2002. "Focused Groundwater Remediation Report for the 570 Main Street Property, Westbury New York (NYSDEC Site Code #130043A). Volume II of V: Appendix E-1. Appendix E-2." Report to IMC Eastern Corp. (Chatsworth, CA). NMBOOB.200.0016, 485p. SAD 056746 - SAD 057230.
639	Hull & Associates, Inc. (Mason, OH). May 2002. "Focused Groundwater Remediation Report for the 570 Main Street Property, Westbury New York (NYSDEC Site Code #130043A). Volume III of V: Appendix E-2 (Cont'd)." Report to IMC Eastern Corp. (Chatsworth, CA). 455p. SAD 057231 - SAD 057685.

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No.	Reference
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641	Hull & Associates, Inc. (Mason, OH). May 2002. "Focused Groundwater Remediation Report for the 570 Main Street Property, Westbury New York (NYSDEC Site Code #130043A). Volume V of V: Appendix E-4." Report to IMC Eastern Corp. (Chatsworth, CA). 461p. SSB 024188 - SSB 024648.
642	Stearns & Wheler, LLC (Hyannis, MA). May 2002. "Work Plan: Remedial Investigation Phase V, Vishay General Semiconductor, Hicksville, New York." Report to Vishay General Semiconductor, Inc.. 110p. SAD 112630 - SAD 112739.
643	URS Corp.. May 3, 2002. "Groundwater Investigation Work Plan, Former Sylvania Electric Products Incorporated Facility, Cantiague Rock Road, Hicksville, New York." Report to GTE Operations Support Inc.. 23p. SAR 251876-SAR 251898.
644	URS Corp.. May 3, 2002. "Soil Boring Work Plan, Former Sylvania Electric Products Incorporated Facility, Hicksville, New York." Report to GTE Operations Support Inc.. 19p. SAR 251858-SAR 251875.
645	Finan, JD. [Hull & Associates, Inc.]. May 10, 2002. "Letter to C. Vasudevan (NYSDEC) re: Progress Report #72 for April 10, 2002 through May 10, 2002 for the Interim Remedial Measure Program (IRM Program) at the NYSDEC Site Code #130043A in Westbury, New York; NMB004.300.0132." 2p. SW 122426 - SW 122427.
646	Severn Trent Laboratories, Inc. (STL) Connecticut (Shelton, CT) ; Hobart, PT. May 13, 2002. "Analytical Report (Job Number: 201016), Hicksville - Monthly." Report to S & W Services. 14p. SAD 099660 - SAD 099673.
647	Finan, JD. [Hull & Associates, Inc.]. June 10, 2002. "Letter to C. Vasudevan (NYSDEC) re: Progress Report #73 for May 10, 2002 through June 10, 2002 for the Interim Remedial Measure Program (IRM Program) at the NYSDEC Site Code #130043A in Westbury, New York; NMB004.300.0133." 2p. SW 121540 - SW 121541.
648	Turley, WL. [Hull & Associates, Inc.]. June 10, 2002. "Letter to J. Jones (NYSDEC) re: Progress Report #8 for April 10, 2002 through June 10, 2002 for the Focused Groundwater Remediation at the NYSDEC Site Code #130043A in Westbury, New York (Site); NMB008.200.0017." 2p. SAD 042958 - SAD 042959.
649	Hineline, TL. [Stearns & Wheler, LLC]. June 12, 2002. "Letter to K. Carpenter (NYSDEC) re: Vishay General Semiconductor, Site Number: 1-30-020, Operable Unit 2, Remedial Investigation Phase V Work Plan, S&W Job No. 90281. Addendum to Remedial Investigation Phase V Work Plan." 9p. SSB 221645 - SSB 221653.
650	Severn Trent Laboratories, Inc. (STL) (Shelton, CT) ; Hobart, PT. June 13, 2002. "Analytical Report (Job Number: 201192), Project: Hicksville - Monthly." Report to S & W Services. 21p. SAD 099674 - SAD 099694.
651	CA Rich Consultants, Inc. (Plainview, NY). July 2002. "Quarterly Monitoring Report, Second Quarter 2002, Utility Manufacturing Company, 700 Main Street, Westbury, New York." Report to Utility Manufacturing Co. (Westbury, NY). 78p. SAD 073540 - SAD 073617.
652	FPM Group (Ronkonkoma, NY). July 2002. "Soil Vapor Extraction and Air Sparge Pilot Test Report, Arkwin Industries, Inc. Site, Westbury, New York, NYSDEC Site # 1-30-043D." Report to Arkwin Industries, Inc.. Submitted to New York State, Dept. of Environmental Conservation (NYSDEC). 342p. SAD066904 - SAD067245.
653	Finan, JD. [Hull & Associates, Inc.]. July 10, 2002. "Letter to C. Vasudevan (NYSDEC) re: Progress Report #74 for June 10, 2002 through July 10, 2002 for the Interim Remedial Measure Program (IRM Program) at the NYSDEC Site Code #130043A in Westbury, New York; NMB004.300.0134.DOC." 2p. SW 121292 - SW 121293.
654	Turley, WL. [Hull & Associates, Inc.]. July 10, 2002. "Letter to J. Jones (NYSDEC) re: Progress Report #9 for June 10, 2002 through July 10, 2002 for the Focused Groundwater Remediation at the NYSDEC Site Code #130043A in Westbury, New York (Site); NMB008.200.0018." 2p. SAD 042949 - SAD 042950.
655	CA Rich Consultants, Inc. (Plainview, NY). August 2002. "Quarterly Monitoring Report, Second Quarter 2002, Soil Vapor Extraction and Air Sparging System, Tishcon Corporation, 30 - 36 New York Avenue and 31 - 33 Brooklyn Avenue, Westbury, New York." Report to Tishcon Corp. (Westbury, NY). 82p. SAD068912 - SAD068993.
656	CA Rich Consultants, Inc. (Plainview, NY). August 2002. "Off-Site RD/RA Progress Report, Tishcon Corporation, 30 - 36 New York Avenue and 31 - 33 Brooklyn Avenue, Westbury, New York." Report to Tishcon Corp. (Westbury, NY). 4p. SAD 046716 - SAD 046719.
657	Impact Environmental ; Allen, J ; Kleaka, KC. August 2002. "Focused Remedial Investigation Report Conducted at 36 Sylvester Street Site, Site Code 1-30-043U, Westbury, New York (Draft)." Report to New York State, Dept. of Environmental Conservation (NYSDEC). 22p. SAD 081700 - SAD 081721.
658	Finan, JD. [Hull & Associates, Inc.]. August 12, 2002. "Letter to G. Bobersky (NYSDEC) re: Progress Report #75 for July 10, 2002 through August 10, 2002 for the Interim Remedial Measure Program (IRM Program) at the NYSDEC Site Code #130043A in Westbury, New York; NMB004.300.0135.DOC." 2p. SSB 002964 - SSB 002965.
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660	Severn Trent Laboratories, Inc. (STL) (Shelton, CT) ; Hobart, PT. August 30, 2002. "Analytical Report (Job Number: 201601), Project: Gen. Semiconductor." Report to Stearns & Wheler, LLC (Hyannis, MA). 56p. SDOH 248569 - SDOH 248624.
661	Impact Environmental (Kings Park, NY). September 2002. "Appendices Regarding: 36 Sylvester Street Site, Site Code 1-30-043U, Westbury, New York." 418p. SAD 081282 - SAD 081699.

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No.	Reference
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663	Severn Trent Laboratories, Inc. (STL) (Shelton, CT) ; Hobart, PT. September 3, 2002. "Analytical report (Job Number: 201602), Project: Gen. Semiconductor." Report to Stearns & Wheler, LLC (Hyannis, MA).. 198p. SDOH 248625 - SDOH 248822.
664	Robins, KS. [Dvirka and Bartilucci Consulting Engineers]. September 9, 2002. "Letter to J. Jones (NYSDEC) re: New Cassel Industrial Area, off-site groundwater monitoring and assessment program, Work Assignment No. D003600-25, D&B No. 1898." 28p. SAD 055256 - SAD 055283.
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666	Hull & Associates, Inc. (Mason, OH) ; Turley, WL. September 10, 2002. "Letter Report to J. Jones (NYSDEC) re: Progress Report #11 for August 12, 2002 through September 10, 2002 for the Focused Groundwater Remediation at the NYSDEC Site Code #130043A in Westbury, New York (Site); NMB008.200.0025." 130p. SAD 059764 - SAD 059767SSB 028948 - SSB 029073.
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Appendix A: List of Documents/Data Sources that USEPA Should Have Relied Upon in Developing CSM

No.	Reference
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706	URS Corp. (Rolling Meadows, IL). March 2003. "Soils Report Fall 2002, Former Sylvania Electric Products Incorporated Facility, Hicksville, New York, Site Number V00089-1." Report to GTE Operations Support Inc.. 442p. SAD 108861 - SAD 109302.
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716	Severn Trent Services (Shelton, CT). April 25, 2003. "Preliminary report." Report to Environmental Strategies Co.. 6p. ALBED00130283 - ALBED00130288.
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728	URS Corp.. June 2003. "Comprehensive Soil Remediation Program Work Plan, Former Sylvania Electric Products Facility, Hicksville, New York (Revision 5)." Report to GTE Operations Support Inc.. Submitted to New York State, Dept. of Environmental Conservation (NYSDEC). 330p. SAD 107524 - SAD 107853.
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732	Sulzer Metco, Inc. (Westbury, NY). June 23, 2003. "Closure Plan, Sulzer Metco (US), Inc., 1101 Prospect Avenue, Westbury, NY 11590." 10p. SSB245810 - SSB245815SSB245870 - SSB245873.
733	CA Rich Consultants, Inc. (Plainview, NY). July 2003. "Post Remediation Groundwater Monitoring Report, Operable Unit - 1 (OU-1), Utility Manufacturing Company, 700 Main Street, Westbury, New York." Report to Utility Manufacturing Co. (Westbury, NY). 72p. SAD 074174 - SAD 074245.
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Appendix A: List of Documents/Data Sources that USEPA Should Have Relied Upon in Developing CSM

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796	URS Corp.. April 2004. "Historic Leaching Pool Bias Sampling Protocol, Former Sylvania Electric Products Incorporated Facility, Hicksville, New York." Report to GTE Operations Support Incorporated. 3p. SSB 202963-SSB 202965.
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808	ESC Engineering of New York, P.C. (Cazenovia, NY). May 18, 2004. "Groundwater Interim Remedial Measure, Operable Unit No. 2, Full-Scale Design Report, Groundwater Circulation Well System, Former General Instrument Corporation Site, Hicksville, New York (Revision No. 1)." 160p. SAD 115011 - SAD 115170.
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838	CA Rich Consultants, Inc. (Plainview, NY). November 2004. "Final Engineering Report and Operations & Maintenance Manual, On-Site and Off-Site Soil Vapor Extraction and Air Sparging System, Tishcon Corporation, 30 - 36 New York Avenue and 31 - 33 Brookyn Avenue, Westbury, New York." Report to Tishcon Corp. (Westbury, NY). 106p. SAD069318 - SAD069423.
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No.	Reference
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Appendix A: List of Documents/Data Sources that USEPA Should Have Relied Upon in Developing CSM

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1093	Cancemi, BT ; Davis, SO. [FPM Group]. December 9, 2008. "Letter to J. Jones (NYSDEC) re: Soil vapor investigation, Arkwin Industries, Inc. Westbury, New York, NYSDEC Registry # 1-30-043D, FPM File No. 652-08-08." 53p. ALBED00149565 - ALBED00149617.
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No.	Reference
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No.	Reference
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