

Migration of Contaminated Groundwater Under Control
Environmental Indicator (EI) RCRIS code (CA750)
Page 1

DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION

RCRA Corrective Action
Environmental Indicator (EI) RCRIS code (CA750)
Migration of Contaminated Groundwater Under Control

Facility Name: (Former) AL Tech Specialty Steel Facility
Facility Address: Lincoln Ave., Watervliet, New York 12189
Facility EPA ID #: EPA ID #NYD060545209

Definition of Environmental Indicators (for the RCRA Corrective Action)

Environmental Indicators (EI) are measures being used by the RCRA Corrective Action program to go beyond programmatic activity measures (e.g., reports received and approved, etc.) to track changes in the quality of the environment. The two EI developed to-date indicate the quality of the environment in relation to current human exposures to contamination and the migration of contaminated groundwater. An EI for non-human (ecological) receptors is intended to be developed in the future.

Definition of “Migration of Contaminated Groundwater Under Control” EI

A positive “Migration of Contaminated Groundwater Under Control” EI determination (“YE” status code) indicates that the migration of “contaminated” groundwater has stabilized, and that monitoring will be conducted to confirm that contaminated groundwater remains within the original “area of contaminated groundwater” (for all groundwater “contamination” subject to RCRA corrective action at or from the identified facility (i.e., site-wide)).

Relationship of EI to Final Remedies

While Final remedies remain the long-term objective of the RCRA Corrective Action program the EI are near-term objectives which are currently being used as Program measures for the Government Performance and Results Act of 1993, GPRA). The “Migration of Contaminated Groundwater Under Control” EI pertains ONLY to the physical migration (i.e., further spread) of contaminated ground water and contaminants within groundwater (e.g., non-aqueous phase liquids or NAPLs). Achieving this EI does not substitute for achieving other stabilization or final remedy requirements and expectations associated with sources of contamination and the need to restore, wherever practicable, contaminated groundwater to be suitable for its designated current and future uses.

Duration / Applicability of EI Determinations

EI Determinations status codes should remain in RCRIS national database ONLY as long as they remain true (i.e., RCRIS status codes must be changed when the regulatory authorities become aware of contrary information).

Migration of Contaminated Groundwater Under Control
Environmental Indicator (EI) RCRIS code (CA750)
Page 2

1. Has **all** available relevant/significant information on known and reasonably suspected releases to the groundwater media, subject to RCRA Corrective Action (e.g., from Solid Waste Management Units (SWMU), Regulated Units (RU), and Areas of Concern (AOC)), been **considered** in this EI determination?

If yes - check here and continue with #2 below.

If no - re-evaluate existing data, or

if data are not available, skip to #8 and enter "IN" (more information needed) status code.

Background

The former AL Tech Specialty Steel Corporation industrial complex, located in Watervliet, New York, was engaged in the manufacture of specialty steel products, beginning in 1907. A variety of manufacturing operations were performed to produce the facility's end products, including melting, casting, rolling, forging, extruding, annealing, pickling and cutting. The facility is comprised of two primary areas of interest:

- 1) The Main Plant Area (MPA) encompasses 68 acres of land and is located on Lincoln Avenue and was the area where all manufacturing took place; and
- 2) The Waste Management Area (WMA or "the landfill") is located north of Spring Street Road adjacent to the manufacturing site, and encompasses 52 acres of land. Wastes which were placed in the landfill include slag, metal scrap, electric arc furnace dust, wastewater treatment plant sludge and demolition debris.

The adjacent properties are typically zoned industrial, although there are a limited number of residences and commercial enterprises present east of the WMA and north of the MPA.

In 1999, AL Tech filed for bankruptcy and RealCo was formed to oversee remedial activities at the site. From March 2000 until November 2002, RealCo, Inc. (the current owner of the facility) implemented a landfill reclamation project at the WMA. As part of this project; several thousand tons of Electric Arc Furnace dust (K061) were removed from the landfill and disposed of off-site; several thousand tons of scrap metal were recovered from the landfill; waste water treatment plant sludge was collected and placed into a special containment cell; and the foot print of the landfill was reduced from 17.4 acres to 12.5 acres. The landfill was subsequently closed in accordance with a Department approved closure plan.

Groundwater and surface water monitoring has been performed at the WMA and the MPA for several years under a Department approved sampling and analysis plan.

For all references, please see question # 8.

Migration of Contaminated Groundwater Under Control
Environmental Indicator (EI) RCRIS code (CA750)
Page 3

2. Is **groundwater** known or reasonably suspected to be “**contaminated**”¹ above appropriately protective “levels” (i.e., applicable promulgated standards, as well as other appropriate standards, guidelines, guidance, or criteria) from releases subject to RCRA Corrective Action, anywhere at, or from, the facility?

- X If yes - continue after identifying key contaminants, citing appropriate “levels,” and referencing supporting documentation.
- _____ If no - skip to #8 and enter “YE” status code, after citing appropriate “levels,” and referencing supporting documentation to demonstrate that groundwater is not “contaminated.”
- _____ If unknown - skip to #8 and enter “IN” status code.

Groundwater sampling results have frequently exceeded the applicable groundwater standards as indicated in the following Tables:

Table 1 - Main Plant Area

	Standard (ug/l)	Maximum Concentration (ug/l)*
Antimony	50	20
Barium	1000	3530
Beryllium	4.0	4.8
Chromium	50	402
Molybdenum	180	1770
Nickel	100	6880
Ammonia	2000	3040
Fluoride	1500	24800
Nitrate	10000	77000
Sulfate	250000	1009000
PCBs	0.1	1.89

* Maximum concentration since June 2003.

¹“Contamination” and “contaminated” describes media containing contaminants (in any form, NAPL and/or dissolved, vapors, or solids, that are subject to RCRA) in concentrations in excess of appropriate “levels” (appropriate for the protection of the groundwater resource and its beneficial uses).

Migration of Contaminated Groundwater Under Control
Environmental Indicator (EI) RCRIS code (CA750)
Page 4

Table 2 - Waste Management Area

	Standard (ug/l)	Maximum Concentration* (ug/l)
Chromium	50	491
Hexavalent Chromium	50	240
Molybdenum	180	1150
Ammonia	2000	17,600
Fluoride	1500	28,900
Sulfate	250,000	3,600,000

* Maximum concentration since October 2003.

3. Has the **migration** of contaminated groundwater **stabilized** (such that contaminated groundwater is expected to remain within “existing area of contaminated groundwater”² as defined by the monitoring locations designated at the time of this determination)?

If yes - continue, after presenting or referencing the physical evidence (e.g., groundwater sampling/measurement/migration barrier data) and rationale why contaminated groundwater is expected to remain within the (horizontal or vertical) dimensions of the “existing area of groundwater contamination”²).

If no (contaminated groundwater is observed or expected to migrate beyond the designated locations defining the “existing area of groundwater contamination”²) - skip to #8 and enter “NO” status code, after providing an explanation.

If unknown - skip to #8 and enter “IN” status code.

Main Plant Area

The primary area of concern at the Main Plant Area is in the vicinity of the old Pickle House spill. Groundwater recovery was performed in this area from 1995 until November 2003, when the NYSDEC approved the shutdown of the last operating recovery well. Although some residual contamination exists, concentration of contaminants were drastically reduced during this

²“existing area of contaminated groundwater” is an area (with horizontal and vertical dimensions) that has been verifiably demonstrated to contain all relevant groundwater contamination for this determination, and is defined by designated (monitoring) locations proximate to the outer perimeter of “contamination” that can and will be sampled/tested in the future to physically verify that all “contaminated” groundwater remains within this area, and that the further migration of “contaminated” groundwater is not occurring. Reasonable allowances in the proximity of the monitoring locations are permissible to incorporate formal remedy decisions (i.e., including public participation) allowing a limited area for natural attenuation.

**Migration of Contaminated Groundwater Under Control
Environmental Indicator (EI) RCRIS code (CA750)
Page 5**

time period. Table 3 compares the results for several contaminants prior to start up of the remediation and following shutdown of the system.

Table 3

	Chromium (ug/l)	Nickel (ug/l)	Nitrate (mg/l)	Fluoride (mg/l)
MW-4 (December 1994)	23.5	3,460	48.0	120
MW-4 (December 2004)	33.6	5.6	0.55	2.64
MW-4B (December 1994)	86,500	334,000	2,900	250*
MW-4B (December 2004)	<4.0	1,800	1.69	17.9
MW-19 (December 1994)	6.0	1,000	94.0	18
MW-19 (December 2004)	<4.0	210	0.79	18.8
MW-19B (December 1994)	11.0	31,000	11,000	22.0
MW-19B (December 2004)	4.9	5,920	29	20.0

* Result from December 1996.

Contaminant concentrations have remained stable or decreased since the shutdown of the recovery system. Although some residual contamination is present at off site wells 19 and 19B down gradient monitoring wells were not recommended due to the likely presence of alternate (non-AL Tech) sources of groundwater contamination at the adjacent property which is used for industrial purposes.

Other areas of concern at the Main Plant Area include:

- PCB groundwater contamination at the South Lagoon. PCB concentrations in wells MW-1B, MW-14 and H-4S have decreased or remained stable. Down gradient wells MW-2 and MW-2B have been non-detect for PCBs.
- LNAPL (fuel oil) plume. A large portion of the Main Plant Area (over 10 acres) had been impacted by fuel oil, including areas where free product (exceeding 1 foot in thickness) was present. Fuel oil was recovered for several years until further removal of the thinning LNAPL layer became infeasible. In 2000, a passive fuel oil collection trench was installed to intercept any remaining fuel oil at the down gradient perimeter of the facility. No fuel oil has ever been recovered from this system.

Waste Management Area

As mentioned above, groundwater monitoring has been performed in accordance with a NYSDEC approved groundwater monitoring program for many years (starting in the early 1980s). In conjunction with the final closure of the landfill, the groundwater monitoring plan

Migration of Contaminated Groundwater Under Control
Environmental Indicator (EI) RCRIS code (CA750)
Page 6

was reevaluated and upgraded to accommodate the reconfigured landfill area. The current groundwater monitoring network includes 24 overburden and bedrock monitoring wells. Wells installed as part of the monitoring upgrade were first sampled in October 2003.

One of the primary objectives of the landfill closure was to contain and isolate all waste materials left in place. This was accomplished by probing the natural clay layer which exists under the landfill area to ensure the material is of adequate thickness and is suitably impermeable and by designing an impermeable cap for the landfill. Reclamation construction activities, including the placement of a temporary cover, were completed during the Fall of 2002. Final landfill closure activities were also implemented during the Fall of 2002, with final closure completed in the Fall of 2004. In general, groundwater quality has improved since the initiation of closure activities.

Historically, the constituent of greatest concern at the WMA has been chromium (total and hexavalent). Chromium was not detected in any of the 24 network monitoring wells during the two most recent sampling events. Additional non-hazardous constituents (including molybdenum; ammonia; fluoride; and sulfate) are present in the WMA, especially in areas near the land filled waste. **Since the waste material is now isolated and contained, further improvement in the groundwater quality is expected.**

4. Does “contaminated” groundwater **discharge** into **surface water** bodies?

- If yes - continue after identifying potentially affected surface water bodies.
- If no - skip to #7 (and enter a “YE” status code in #8, if #7 = yes) after providing an explanation and/or referencing documentation supporting that groundwater “contamination” does not enter surface water bodies.
- If unknown - skip to #8 and enter “IN” status code.

Since monitoring wells near the Krommakill (at both the Main Plant Area and the WMA) are known to be contaminated, it is expected that some small volume of contaminated groundwater discharges to surface water.

5. Is the **discharge** of “contaminated” groundwater into surface water likely to be “**insignificant**” (i.e., the maximum concentration³ of each contaminant discharging into surface water is less than 10 times their appropriate groundwater “level,” and there are no other conditions (e.g., the nature, and number, of discharging contaminants, or environmental setting), which significantly increase the potential for unacceptable impacts to surface water, sediments, or eco-systems at these concentrations)?

- If yes - skip to #7 (and enter “YE” status code in #8 if #7 = yes), after

³As measured in groundwater prior to entry to the groundwater-surface water/sediment interaction (e.g., hyporheic) zone.

Migration of Contaminated Groundwater Under Control
Environmental Indicator (EI) RCRIS code (CA750)
Page 7

documenting: 1) the maximum known or reasonably suspected concentration³ of key contaminants discharged above their groundwater “level,” the value of the appropriate “level(s),” and if there is evidence that the concentrations are increasing; and 2) provide a statement of professional judgement/explanation (or reference documentation) supporting that the discharge of groundwater contaminants into the surface water is not anticipated to have unacceptable impacts to the receiving surface water, sediments, or eco-system.

_____ If no -(the discharge of “contaminated” groundwater into surface water is potentially significant) - continue after documenting: 1) the maximum known or reasonably suspected concentration³ of each contaminant discharged above its groundwater “level,” the value of the appropriate “level(s),” and if there is evidence that the concentrations are increasing; and 2) for any contaminants discharging into surface water in concentrations³ greater than 100 times their appropriate groundwater “levels,” the estimated total amount (mass in kg/yr) of each of these contaminants that are being discharged (loaded) into the surface water body (at the time of the determination), and identify if there is evidence that the amount of discharging contaminants is increasing.

_____ If unknown - enter “IN” status code in #8.

Main Plant Area

Fluoride detections slightly exceed ten times the standard at monitoring well MW-19. However, since fluoride is not categorized as a hazardous constituent, the exceedance is not considered significant. All other contaminants in wells near the Krommakill are at concentrations that are less than ten times the standard.

A surface water and fish and wildlife assessment performed in 1995 concluded:

- 1) Surface water quality did not appear to be impacted.
- 2) Although there did appear to be some impact to sediments, no severely stressed or impaired areas were found.
- 3) There was continued improvement of stream conditions with respect to results of similar assessments performed in 1987 and 1991.

Waste Management Area

All contaminant concentrations were less than ten times the applicable standard for all wells for all samples collected in calendar year 2004, with the exception of one data point; sulfate concentrations were slightly greater than ten times the standard in well 28B. However, since sulfate is not categorized as a hazardous constituent, the exceedance is not considered significant.

Surface water samples have been collected at the WMA for many years in accordance with a

Migration of Contaminated Groundwater Under Control
Environmental Indicator (EI) RCRIS code (CA750)
Page 8

NYSDEC approved work plan. Surface water samples have been collected from an unnamed tributary that originates near the center of the waste material, and surface water samples have also been collected from the Krommakill, both upstream and downstream from where the unnamed tributary enters the Krommakill. Although chromium has been detected in samples collected from the unnamed tributary, samples from the Krommakill show no impact from the WMA.

6. Can the **discharge** of “contaminated” groundwater into surface water be shown to be “**currently acceptable**” (i.e., not cause impacts to surface water, sediments or eco-systems that should not be allowed to continue until a final remedy decision can be made and implemented⁴)?

_____ If yes - continue after either: 1) identifying the Final Remedy decision incorporating these conditions, or other site-specific criteria (developed for the protection of the site’s surface water, sediments, and eco-systems), and referencing supporting documentation demonstrating that these criteria are not exceeded by the discharging groundwater; OR
2) providing or referencing an interim-assessment,⁵ appropriate to the potential for impact, that shows the discharge of groundwater contaminants into the surface water is (in the opinion of a trained specialists, including ecologist) adequately protective of receiving surface water, sediments, and eco-systems, until such time when a full assessment and final remedy decision can be made. Factors which should be considered in the interim-assessment (where appropriate to help identify the impact associated with discharging groundwater) include: surface water body size, flow, use/classification/habitats and contaminant loading limits, other sources of surface water/sediment contamination, surface water and sediment sample results and comparisons to available and appropriate surface water and sediment “levels,” as well as any other factors, such as effects on ecological receptors (e.g., via bio-assays/benthic surveys or site-specific ecological Risk Assessments), that the overseeing regulatory agency would deem appropriate for making the EI determination.

_____ If no - (the discharge of “contaminated” groundwater can not be shown to be “**currently acceptable**”) - skip to #8 and enter “NO” status code, after documenting the currently unacceptable impacts to the surface water body, sediments, and/or eco-systems.

_____ If unknown - skip to 8 and enter “IN” status code.

⁴Note, because areas of inflowing groundwater can be critical habitats (e.g., nurseries or thermal refugia) for many species, appropriate specialist (e.g., ecologist) should be included in management decisions that could eliminate these areas by significantly altering or reversing groundwater flow pathways near surface water bodies.

⁵The understanding of the impacts of contaminated groundwater discharges into surface water bodies is a rapidly developing field and reviewers are encouraged to look to the latest guidance for the appropriate methods and scale of demonstration to be reasonably certain that discharges are not causing currently unacceptable impacts to the surface waters, sediments or eco-systems.

Migration of Contaminated Groundwater Under Control
Environmental Indicator (EI) RCRIS code (CA750)
Page 9

7. Will groundwater **monitoring** / measurement data (and surface water/sediment/ecological data, as necessary) be collected in the future to verify that contaminated groundwater has remained within the horizontal (or vertical, as necessary) dimensions of the “existing area of contaminated groundwater?”

If yes - continue after providing or citing documentation for planned activities or future sampling/measurement events. Specifically identify the well/measurement locations which will be tested in the future to verify the expectation (identified in #3) that groundwater contamination will not be migrating horizontally (or vertically, as necessary) beyond the “existing area of groundwater contamination.”

If no - enter “NO” status code in #8.

If unknown - enter “IN” status code in #8.

This project was recently transferred to the NYSDEC’s Division of Environmental Remediation. The new project managers have committed to continued groundwater monitoring which will appropriately monitor potential contaminant migration.

8. Check the appropriate RCRIS status codes for the Migration of Contaminated Groundwater Under Control EI (event code CA750), and obtain Supervisor (or appropriate Manager) signature and date on the EI determination below (attach appropriate supporting documentation as well as a map of the facility).

YE - Yes, “Migration of Contaminated Groundwater Under Control” has been verified. Based on a review of the information contained in this EI determination, it has been determined that the “Migration of Contaminated Groundwater” is “Under Control” at the Former AL Tech Specialty Steel facility, EPA ID #NYD060545209, located at Lincoln Avenue, Watervliet, New York. Specifically, this determination indicates that the migration of “contaminated” groundwater is under control, and that monitoring will be conducted to confirm that contaminated groundwater remains within the “existing area of contaminated groundwater” This determination will be re-evaluated when the Agency becomes aware of significant changes at the facility.

NO - Unacceptable migration of contaminated groundwater is observed or expected.

IN - More information is needed to make a determination.

Migration of Contaminated Groundwater Under Control
Environmental Indicator (EI) RCRIS code (CA750)
Page 10

Completed by Denise M. Radtke Date 9/22/05
Denise Radtke
Engineering Geologist 3
New York State Department of Environmental Conservation

Supervisor Edwin Dassatti Date 9/22/05
Edwin Dassatti, P.E., Director
Bureau of Hazardous Waste and Radiation Management
New York State Department of Environmental Conservation

References: Main Plant Area, Year 5 Annual Monitoring Report, Former AL Tech Specialty Steel Corporation, Watervliet, New York, February 16, 2005

Waste Management Area, Year 12 Rounds 1 and 2, Semi-Annual Monitoring Report, Former AL Tech Specialty Steel Corporation, Watervliet, New York. November 16, 2004.

Post-Closure Care Plan for the Closed Landfill at the Former AL Tech Specialty Steel Site, Watervliet, New York, June 8, 2004.

Draft Phase I RCRA Facility Investigation, AL Tech Specialty Steel Corporation, Watervliet, New York, August 11, 1995.

Locations where References may be found:

New York State Department of Environmental Conservation, Central Office
625 Broadway
Albany, New York 12233

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REFERENCE:

USGS 7.5 MINUTE TOPOGRAPHIC QUADRANGLE, TROY SOUTH, NY, DATED 1953, PHOTOREVISED 1980. SCALE 1:24000.



QUADRANGLE LOCATION

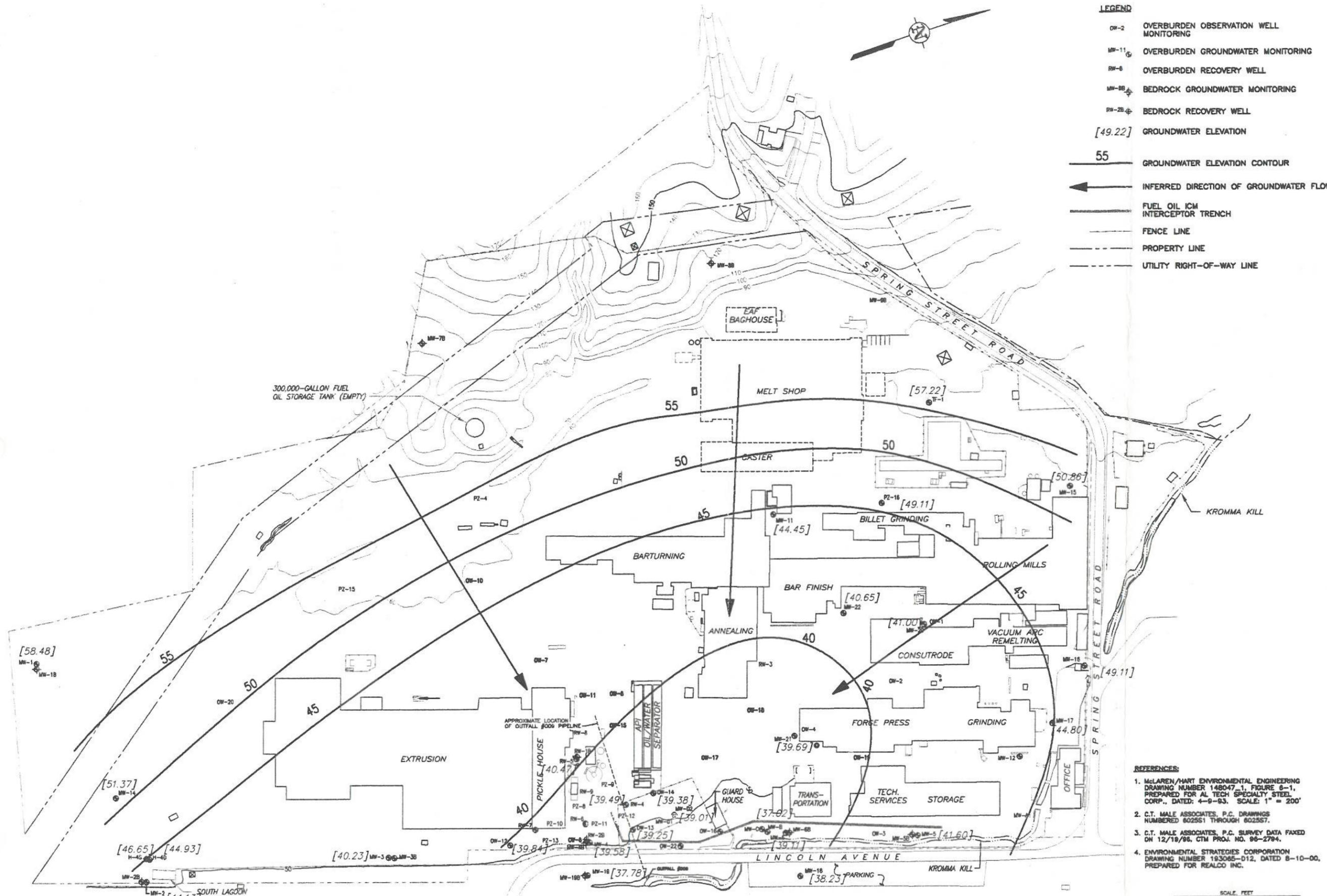


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Figure 1
SITE LOCATION MAP

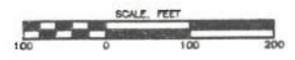
ENVIRONMENTAL SUMMARY REPORT AND PRELIMINARY ENGINEERING EVALUATION
 PREPARED FOR
AL TECH SPECIALTY STEEL CORPORATION
 WATERVLIET, NEW YORK

TMB 2:\DWC\40\4 105.dwg :11 11, 1998 1:23p



- LEGEND**
- OW-2 OVERBURDEN OBSERVATION WELL MONITORING
 - MW-11 OVERBURDEN GROUNDWATER MONITORING
 - RW-6 OVERBURDEN RECOVERY WELL
 - MW-86 BEDROCK GROUNDWATER MONITORING
 - RW-28 BEDROCK RECOVERY WELL
 - [49.22] GROUNDWATER ELEVATION
 - 55 GROUNDWATER ELEVATION CONTOUR
 - ← INFERRED DIRECTION OF GROUNDWATER FLOW
 - FUEL OIL ICM INTERCEPTOR TRENCH
 - FENCE LINE
 - - - PROPERTY LINE
 - - - UTILITY RIGHT-OF-WAY LINE

- REFERENCES:**
1. McLAREN/HART ENVIRONMENTAL ENGINEERING DRAWING NUMBER 148047-1, FIGURE 8-1, PREPARED FOR AL TECH SPECIALTY STEEL CORPORATION, DATED: 4-9-93. SCALE: 1" = 200'
 2. C.T. MALE ASSOCIATES, P.C. DRAWINGS NUMBERED 602551 THROUGH 602557.
 3. C.T. MALE ASSOCIATES, P.C. SURVEY DATA FAXED ON 12/18/96, CTM PROJ. NO. 96-2794.
 4. ENVIRONMENTAL STRATEGIES CORPORATION DRAWING NUMBER 193065-D12, DATED 8-10-00, PREPARED FOR REALCO INC.



REVISED BY: Y7P 08-10-06
DRAWING NUMBER: WMPA0502

REV	DATE	BY	DESCRIPTION
1			
2			
3			

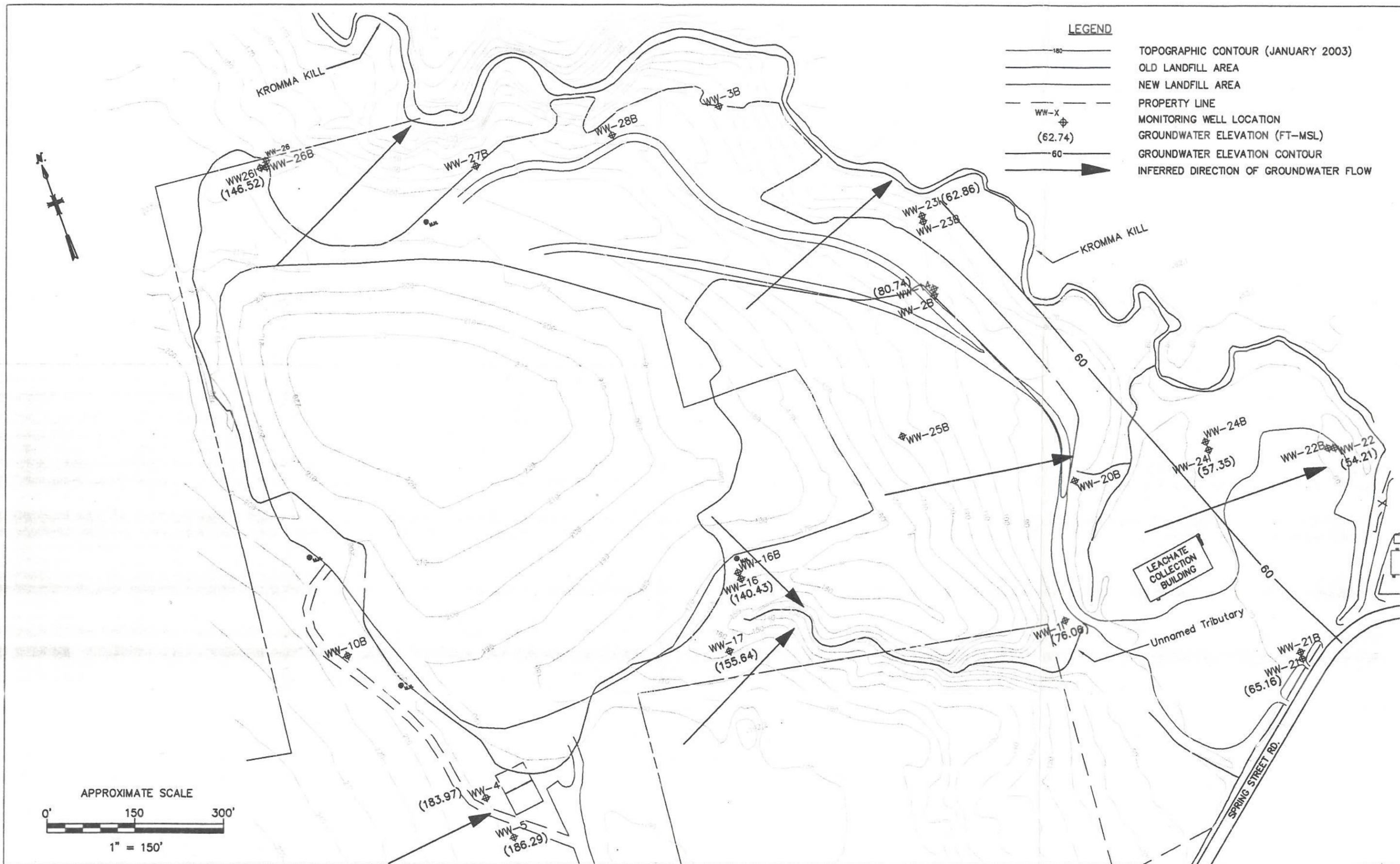
POTENTIOMETRIC SURFACE MAP
OVERBURDEN (JUNE 2004)

FORMER AL TECH SPECIALTY
STEEL CORPORATION
WATERVLIET, NEW YORK

YEAR 5
ANNUAL MONITORING REPORT

REALCO INC.
WATERVLIET, NEW YORK

Figure 3-1



POTENTIOMETRIC SURFACE MAP
 (OVERBURDEN/INTERFACE)
 YEAR 12, ROUND 2 - SEPTEMBER 2004

SOLID WASTE MANAGEMENT UNITS

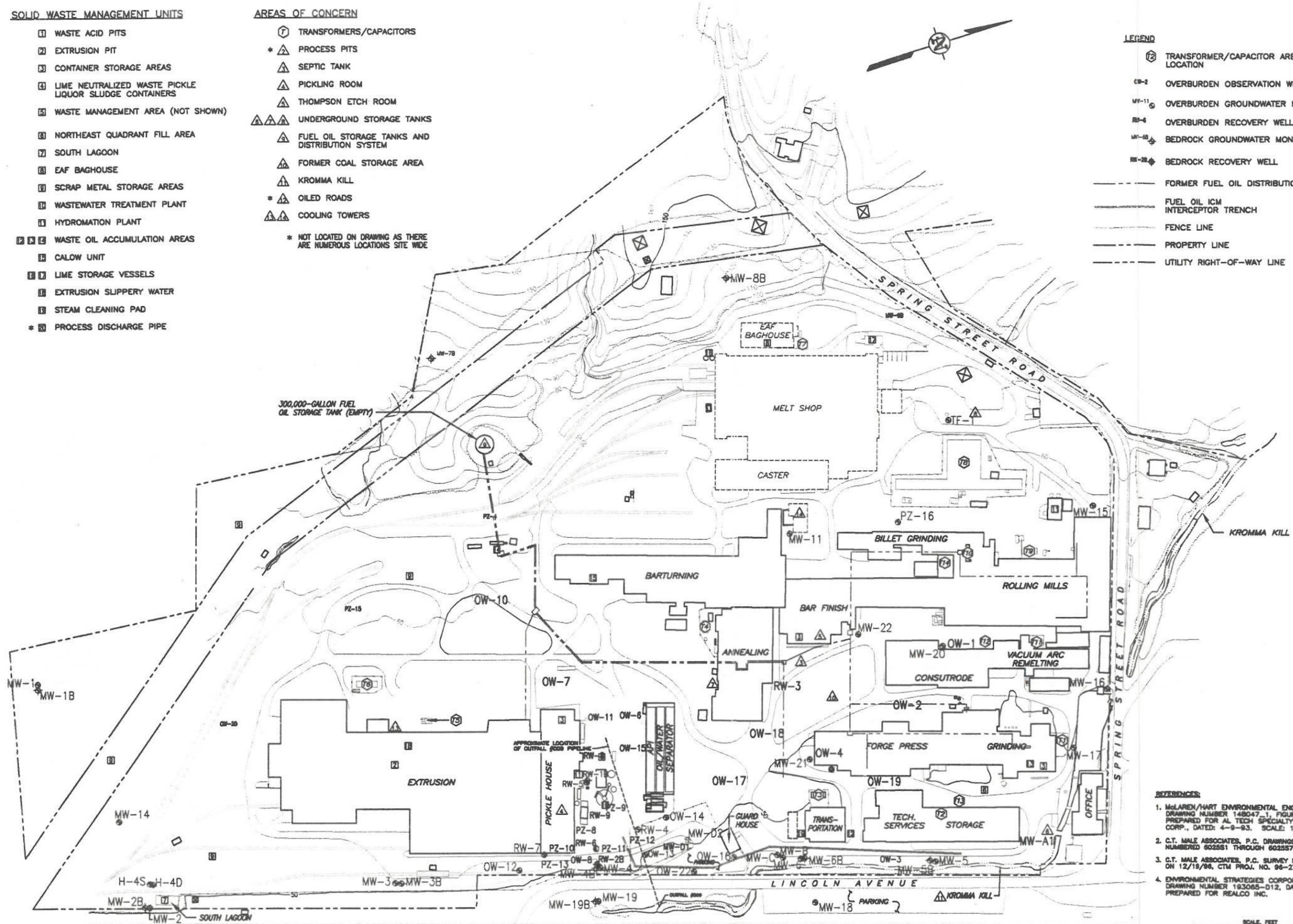
- 1 WASTE ACID PITS
- 2 EXTRUSION PIT
- 3 CONTAINER STORAGE AREAS
- 4 LIME NEUTRALIZED WASTE PICKLE LIQUOR SLUDGE CONTAINERS
- 5 WASTE MANAGEMENT AREA (NOT SHOWN)
- 6 NORTHEAST QUADRANT FILL AREA
- 7 SOUTH LAGOON
- 8 EAF BAGHOUSE
- 9 SCRAP METAL STORAGE AREAS
- 10 WASTEWATER TREATMENT PLANT
- 11 HYDRINATION PLANT
- 12 WASTE OIL ACCUMULATION AREAS
- 13 CALOW UNIT
- 14 LIME STORAGE VESSELS
- 15 EXTRUSION SLIPPERY WATER
- 16 STEAM CLEANING PAD
- * 17 PROCESS DISCHARGE PIPE

AREAS OF CONCERN

- 18 TRANSFORMERS/CAPACITORS
 - * 19 PROCESS PITS
 - 20 SEPTIC TANK
 - 21 PICKLING ROOM
 - 22 THOMPSON ETCH ROOM
 - 23 UNDERGROUND STORAGE TANKS
 - 24 FUEL OIL STORAGE TANKS AND DISTRIBUTION SYSTEM
 - 25 FORMER COAL STORAGE AREA
 - 26 KROMMA KILL
 - * 27 OILED ROADS
 - 28 COOLING TOWERS
- * NOT LOCATED ON DRAWING AS THERE ARE NUMEROUS LOCATIONS SITE WIDE

LEGEND

- 18 TRANSFORMER/CAPACITOR AREA LOCATION
- OW-2 OVERBURDEN OBSERVATION WELL
- MW-11 OVERBURDEN GROUNDWATER MONITORING
- RW-6 OVERBURDEN RECOVERY WELL
- MW-6B BEDROCK GROUNDWATER MONITORING
- RW-28 BEDROCK RECOVERY WELL
- FORMER FUEL OIL DISTRIBUTION SYSTEM
- FUEL OIL ICM INTERCEPTOR TRENCH
- FENCE LINE
- PROPERTY LINE
- UTILITY RIGHT-OF-WAY LINE



- REFERENCES:**
1. McLAREN/HART ENVIRONMENTAL ENGINEERING DRAWING NUMBER 148047-1, FIGURE 6-1, PREPARED FOR AL TECH SPECIALTY STEEL CORP., DATED: 4-9-93. SCALE: 1" = 200'
 2. C.T. MALE ASSOCIATES, P.C. DRAWINGS NUMBERED 6025S1 THROUGH 6025S7.
 3. C.T. MALE ASSOCIATES, P.C. SURVEY DATA FAXED ON 12/19/96, CTM PROJ. NO. 96-2784.
 4. ENVIRONMENTAL STRATEGIES CORPORATION DRAWING NUMBER 193085-D12, DATED 8-10-00, PREPARED FOR REALCO INC.



REVISION BY: YJP 08-10-05
 DRAWING NUMBER: WMPAD001

FORMER AL TECH SPECIALTY
 STEEL CORPORATION
 WATERLIET, NEW YORK

SITE MAP AND
 MONITORING NETWORK
 YEAR 5
 ANNUAL MONITORING REPORT

REALCO INC.
WATERLIET, NEW YORK

Figure 2-1