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**INTERIM CORRECTIVE MEASURES REPORT
FORMER PUMICE LAGOON**

**GAR ELECTROFORMING DIVISION
DANBURY, CONNECTICUT**

DECEMBER 2007

Prepared for:

**GAR ELECTROFORMING DIVISION
ELECTROFORMERS, INC.**
PO Box 340
Danbury, Connecticut 06810

December 18, 2007

Mr. Raphael J. Cody
Corrective Action Section
Office of Site Remediation and Restoration
United States Environmental Protection Agency
John F. Kennedy Federal Building (HBT)
One Congress Street, Suite 1100I
Boston, MA 02114-2023



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**Subject: Interim Corrective Measure Report
Former Pumice Lagoon
GAR Electroforming Division
Electroformers, Inc.
EPA ID No. CTD064834914**

Dear Mr. Cody:

On behalf of our client, GAR Electroforming Division (GAR), we are pleased to provide you the attached Interim Corrective Measures Report for the former Pumice Lagoon at their Danbury facility. This report summarizes the field activities associated with removal and off-site disposal of nickel contaminated wastes and soils in the former lagoon. The work described in this report was performed in accordance with the ICM Work Plan. In summary, the ICM resulted in removal of approximately 136.5 tons of nickel contaminated waste and soil from this unit, thereby significantly reducing its potential to adversely impact shallow groundwater.

This report also presents four quarters of ground water monitoring subsequent to the ICM demonstrating that groundwater at the site meets CTDEP requirements for remediation in a GB groundwater area. At this time, we believe that GAR has fulfilled all of its obligations under the corrective actions program and no further actions are required.

We appreciate your cooperation and support in our efforts to resolve this issue. As always, should you have any questions or require further information, please feel free to contact Mr. George Ray of GAR or me at your convenience.

Sincerely,

SE Technologies, LLC

A handwritten signature in black ink that reads "Roger A. Dhonau".

Roger A. Dhonau, PE, QEP
Chief Environmental Engineer

cc: George Ray – GAR Electroforming

**INTERIM CORRECTIVE MEASURES REPORT
FORMER PUMICE LAGOON
GAR ELECTROFORMING DIVISION**

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**INTERIM CORRECTIVE MEASURES REPORT
FORMER PUMICE LAGOON
GAR ELECTROFORMING DIVISION**

1.0 INTRODUCTION

This Interim Corrective Measures (ICM) Report has been prepared for the GAR Electroforming Division (GAR) facility located in Danbury, Connecticut. The facility is located in the Commerce Park section of Danbury and depicted in Figure 1. This report summarizes the interim corrective measure that took place within the former Pumice Lagoon during September, 2006.

The facility was constructed in 1963 specifically for electroforming work. Two electroforming wastewater treatment sludge lagoons were constructed by the original owner (Heli-Coil) in the extreme eastern corner of the property. A third lagoon, immediately northeast of the sludge lagoons, was designed to receive spent pumice from surface finishing of certain nickel products. The facility was acquired by GAR in 1979 from Heli-Coil (Division of Mite Corp.) and continued operations under the same general production technology.

Records of operation of these three lagoons are incomplete. However, according to GAR personnel there are no known periods when electroforming wastewater treatment sludge was intentionally or accidentally discharged to the Pumice Lagoon. No information on operation during the period prior to acquisition by GAR (1963-1979) was available for use in development of the ICM Plan.

The two electroplating sludge lagoons underwent closure in two stages. In November 1986, 247 tons of sludge and heavily contaminated soil were removed from the two electroforming wastewater treatment sludge lagoons. Excavation was halted when groundwater was encountered. All visible sludge had been removed, but constituent concentrations in remaining soils exceeded clean closure criteria. As clean closure was not practical, closure was completed in accordance with a CTDEP and EPA approved Closure Plan in June 1988. This Closure Plan allowed closure completion under 40 CFR 265.310 with placement of an engineered cap.

At the time of closure, a single sample was collected from the adjacent Pumice Lagoon. This sample (white in coloration) contained trace concentrations of nickel, as was anticipated, given its use. The nickel content (630 mg/kg) was far below that typical of the sludge (30-50 g/kg) and did not contain other sludge constituents in the same proportions as in the sludge. Therefore, it was not considered to have been impacted by the sludge lagoon operations and was not considered to be a part of the RCRA lagoon closure.

Over the ensuing years of post-closure monitoring, groundwater concentrations of all monitored parameters associated with the closed sludge lagoons decreased as was expected. However, nickel concentrations down gradient of the Pumice Lagoon soon leveled and failed to continue the anticipated decrease over time.

In its letter dated August 8, 2005, the Connecticut Department of Environmental Protection (CTDEP) informed GAR that it was to investigate and, if necessary, remediate any spills or releases of hazardous materials pursuant to RCSA Section 22a-449(c)-105(h)(6). In response, further evaluation of the Pumice Lagoon was performed to determine if it was a source of the persistent high groundwater nickel concentrations. A representative of Premier Laboratory (Dayville, CT) collected three samples of the pumice lagoon on August 16, 2005. The samples were analyzed for total and leachable nickel. Both visual observations and results of the analyses demonstrated that a material dissimilar to the spent pumice was present in that unit.

Upon receipt of this information, GAR again contracted Premier Laboratory to complete a visual profile of the Pumice Lagoon. This profile determined that this same green material was present in a thin layer that extended intermittently over much of the central portion of the lagoon. It is speculated that at sometime during the operational history of the electroforming wastewater treatment sludge lagoons, one or more events occurred whereby sludge (which had the same blue-green coloration) was accidentally or intentionally released to the Pumice Lagoon. Again, GAR management has no recollection or records of such a release having taken place. Conversely, there is no documentation indicating that such a discharge (intentional or accidental) took place while operated by the previous owner. As the treatment system was modified in 1986 and discharge to all three lagoons ceased that year, the release is at least 20 years old.

Subsequent to the profiling performed by Premier Laboratory, an Interim Corrective Measures Work Plan was prepared and submitted to EPA Region I for review and approval. The Work Plan was approved by EPA in a letter dated December 19, 2005 (Appendix D).

The primary goal of this Interim Corrective Measures (ICM) was to perform a cleanup of the Pumice Lagoon, via excavation and off-site disposal, to immediately reduce the potential for groundwater contamination and direct ecological exposure by the apparent wastewater treatment sludge residues. A secondary goal was for removal to continue until soils remaining within the Pumice Lagoon met both Connecticut's Remediation Criteria for Direct Soil and Connecticut's Pollutant Mobility Criteria for an industrial setting.

2.0 REMOVAL ACTIVITIES

2.1 Site Preparation

Prior to mobilization, three random samples of vegetation growing in the Pumice Lagoon were collected by a qualified representative from Premier Laboratory and submitted to that laboratory for analysis of total concentrations of several metals. Although the approved Work Plan called for only analysis of total and leachable nickel (the primary metals used in electroforming operations), the analytical suite was expanded to include all eight RCRA hazardous metals (arsenic, barium, cadmium, chromium, lead, selenium, silver and mercury) as the full history of the lagoon was not fully known.

As the vegetation grew in an area impacted by a listed hazardous waste (F006), evaluation of the vegetation falls under the CTDEP "Contained-In Policy". According to this policy, the vegetation is considered non-hazardous if the concentrations are below the lower of A and B:

- A) Connecticut Industrial/Commercial Direct Contact RSR each of the eight RCRA metals;
- B) Either the Toxicity Characteristics under 40 CFR 261.24 OR
100 x GA Pollutant Mobility Criteria RSR OR
100 x Groundwater Protection Criteria RSR

All three samples contained less than the Connecticut Residential Direct Contact RSR each of the eight RCRA metals. In addition, the total concentration of each metal was such that the maximum possible leachable concentration of each metal was below the Connecticut GA Pollutant Mobility Criteria for that metal. For example, the maximum nickel concentration in the vegetation was 1.4 mg/kg, resulting in a theoretical maximum leachate concentration of 0.07 mg/L compared to a GA mobility criterion of 0.1 mg/L. Accordingly, vegetation in the Pumice Lagoon was considered non-hazardous and managed accordingly.

The vegetation was cut and stockpiled outside of the lagoon area by representatives from Excavation Technologies for subsequent removed for disposal by a local landscape contractor.

It should be noted that as the vegetation was growing in the waste, only vegetative matter above the surface was removed in this manner. Segregating root material from the actual waste was considered impractical and therefore slated for management with the waste. It should also be noted that all cutting of vegetation was performed by individuals qualified to work in a hazardous waste area, as it required working in close proximity to the waste materials. Care was taken to minimize the contact of vegetation with the ground surface within the lagoon area so as to minimize the potential for lagoon contents from being removed with the vegetation.

Lastly, prior to mobilization, the western side of the fence surrounding the Former Pumice Lagoon was removed to allow equipment access to the site.

2.2 Local Permitting and Public Notice

The City of Danbury is the local controlling agency for implementation of Connecticut General Statutes Sections 22a-36 through 22a-45 governing activities that impact or have the potential to impact Inland Wetlands and Watercourses. As the former Pumice Lagoon was within 100 feet of a listed wetland, it was considered to be in an Upland Review Area and considered a Regulated Activity by Danbury. Accordingly, a permit application was submitted to Danbury and approval received. As required, an activity reporting form was also submitted to the Inland Water Resources Division of the Connecticut Department of Environmental Protection. A copy of the approval letter from the City of Danbury and the completed notification form submitted to the Inland Water Resources Division is provided in Attachment D.

In accordance with Section 22a-449(c)-105(h)(7) of the Connecticut hazardous waste rules (Public Participation), GAR was obligated to notify various public entities of the pending corrective action at least 30 days prior to the scheduled date of that action. In accordance with this requirement and the approved notice schedule, GAR notified the Director of the Health and Housing Department of the City of Danbury, placed an approved legal notice in the local newspaper and submitted copies of the same notice to all neighbors. Records of these notifications are maintained in GAR's environmental files.

2.3 Excavation

A commercial hazardous waste remediation firm, Excavation Technology (ET), was contracted to perform the soil removal, stabilization and transportation activities. Premier Laboratory of Brooklyn, CT was contracted to perform the post excavation soil testing.

ET completed excavation of waste and underlying soil on September 22, 2006. Excavation extended to a depth approximately 6-12 inches below the water table where a layer of sand, gravel and larger stones was encountered. The excavation proceeded laterally and vertically to where no visible nickel sludge was encountered. Excavation began on the eastern end of the lagoon and moved westward, with excavated materials being staged on a lined staging pad.

2.4 Staging and Removal

The waste and contaminated soil was staged on a plastic-lined pad at the western end of the Pumice Lagoon. The pad was approximately 20 feet wide and 40 feet long with no berm around the surrounding edges. However, it was sloped toward the lagoon so that any free liquid would drain back into the pond. This was done to both minimize the amount of tonnage to be transported off site and aid in meeting the free liquids prohibition for bulk solids disposal. A tarp was placed over the pad to serve as temporary protection from weather until the contaminated soil was transported.

The excavated material was considered soil impacted by F006 (electroplating wastewater treatment sludge). Given this status, all excavated material was scheduled for disposal at a facility licensed to handle F006 impacted wastes. All staged soils were loaded and transported to Stablex of Canada on September 25 and 26, 2006. Vehicle weights determined that a total of 136.5 tons of contaminated soils were removed and disposed of during this ICM. The manifests are included as Attachment B.

3.0 POST-ICM SOIL SAMPLING PROCEDURES

The soil sampling program, consisting of ten post-excavation verification samples, was set up to analyze the primary contaminants of concern for the soil in and around the excavation pit. As per the approved Work Plan, ten samples were collected, five from randomly selected locations within the excavation pit and five from the surrounding area within the fenced Pumice Lagoon Area. As individual pre-cleaned sampling scoops were used in this effort, the need for a rinse blank was rendered moot and not completed. The stipulated duplicate sample was inadvertently omitted. All samples were submitted to Premier Laboratory, a CTDEP approved environmental lab for analysis of total and SPLP Chromium, copper and nickel. Analytical data reports and associated Chain of Custody forms are enclosed in this report as Attachment A.

As noted above, samples were collected from random locations. These locations were developed by laying out a 6 foot by 6 foot grid within the fenced area, generating 62 grid points. A random number table was then used to select five samples from grid locations within the excavation pit and five outside the pit. Figures 3 and 4 depict the sample locations and results.

4.0 DATA EVALUATION

The Connecticut Standards for soil and groundwater remediation [RCSA Sections 22a-133k-2 and -3] present five criteria that must be met in order for a given remediation to be considered complete. These are: Direct Exposure, Pollutant Mobility, Groundwater, Surface Water and Soil Vapor Volatilization. The volatilization criteria do not apply as none of the contaminants of concern associated with this unit are volatile substances. The following subsections discuss the results of the post-ICM sampling with respect to each of remaining four criteria. Table 1 summarizes the results of sample analysis with respect to each.

4.1 Direct Exposure

Detectable concentrations for total chromium, copper and total nickel were found in each of the ten post-ICM samples, but well below the Direct Exposure Criteria for an industrial setting (see Table 1). As the property is zoned for industrial use, no further remediation is required to meet this criterion. It should be noted that the more stringent Residential Criteria were also met in all but two locations for copper and nickel.

4.2 Pollutant Mobility

The GAR facility is located in a GB groundwater area. As shown in Table 1, the pollutant mobility criterion for GB groundwater areas was exceeded for nickel only in two samples. All samples met these criteria for chromium and copper. The samples that did exceed the nickel criterion were from the floor of the excavation, approximately one foot below the groundwater table. As noted in RSCA Section 22a-133k-2(c)(1)(A), this criterion only applies to soils above the seasonal low water table. Historic groundwater elevation data taken from the adjacent monitoring wells demonstrates that groundwater elevation rarely varies more than +/-1.0 foot over the course of a year. Therefore, this criterion only applies to the five samples that were not collected from the floor of the excavation. Accordingly, no further remediation is required to meet this criterion.

4.3 Groundwater Remediation Standards

As previously noted, the GAR facility is located in a GB groundwater area. In accordance with RSCA Section 22a-133k-3(a)(1) and (3), remediation of groundwater in a GB area must be protective of surface water quality and must not interfere with existing groundwater uses respectively. In addition, Section 22a-133k-3(b)(2) stipulates that groundwater discharging to wetlands must also meet the aquatic life criteria.

4.3.1 Compliance with 22a-133k-3(a)(1) – Surface Water Protection Criteria

As noted above, groundwater in a GB area must be protective of surface water quality. As stipulated in RSCA Section 22a-133k-3(a)(1) groundwater quality must meet surface water quality standards or background. Pursuit of the surface water quality standard alternative was chosen.

Four rounds of quarterly groundwater monitoring have been completed and included in this report. These data indicates that average down-gradient groundwater quality meets both the nickel and copper criterion for surface water quality as presented in Appendix D to RSCA Section 22a-133k-3 (see Table 2).

In accordance with Section 22a-133k-3(f)(2), compliance with a surface water protection criterion for a substance in groundwater is achieved when the sampling locations are representative of the groundwater plume and the average concentration of such substances in the plume are equal to or less than the applicable surface water protection criterion for at least four consecutive quarterly sampling periods. This requirement has been met. Therefore, no further remediation is required to meet this criterion.

4.3.2 Compliance with 22a-133k-3(a)(3) – Existing Groundwater Use Protection

There are no known uses of groundwater in the immediate vicinity of the GAR facility. Public water has been available within Commerce Park since its construction more than 40 years ago. In addition, groundwater on the GAR property and surrounding parcels has already been

significantly impacted by an historic release from an up gradient industrial site. As a result of this impact by others, an upgrade in groundwater classification is considered extremely unlikely in the foreseeable future. No further remediation is required to meet this aspect of the groundwater criterion.

4.3.3 Applicability of 22a-133k-3(b)(2)

Although the Pumice Lagoon is in close proximity to a wetland, groundwater beneath this unit does not discharge into the wetland. The GAR facility is located in the historic flood plain of the Still River and is of a very consistent topography. Historic groundwater elevation monitoring in the adjacent monitoring wells combined with recent survey data (see Attachment E) demonstrate that the shallow groundwater does not discharge to the adjacent wetland. Rather it is believed that the wetland is simply a man-made artifact area where surface drainage was diverted and laterally bounded to a localized area. It is believed that this was the result of the development of the industrial park approximately 40 years ago. Surface drainage in this area is vertically confined by a low permeability confining unit. This conceptual model is supported by the available groundwater data which has been determined to normally range between one and three feet below ground surface at various down gradient locations from the lagoon. Groundwater elevation data from the past four years has had only one event where the groundwater elevation has reached the lowest ground surface elevation measured. It has not been found to exceed ground surface elevation. Hence, Section 22a-133k-3(b)(2) does not apply.

5.0 CONCLUSION AND RECOMMENDATIONS

The previous text has demonstrated that all five of the Connecticut Standards for soil and groundwater remediation [RCSA Sections 22a-133k-2 and -3] have been met. Accordingly, the remediation is considered complete. No further actions are recommended.

TABLES

TABLE 1
EXCAVATION PIT SAMPLING RESULTS
FORMER PUMICE LAGOON
September 2006

Sample ID		Parameters						
		Total mg/Kg			SPLP mg/L			
		Cu	Ni	Cr	Cu	Ni	Cr	
14		3200	2900	22	0.028	1.3	<0.024	
18		2700	5700	69	0.029	1.4	<0.024	
21		12	15	6	0.046	0.056	<0.024	
26		23	15	13	0.035	0.029	<0.024	
31		16	15	19	<0.024	<0.024	<0.024	
40		78	240	11	<0.024	0.20	<0.024	
45		37	56	10	<0.024	0.025	<0.024	
46		86	170	22	0.039	0.15	<0.024	
48		260	280	17	0.062	0.34	<0.024	
53		1100	230	28	0.080	0.13	<0.024	
Connecticut Direct Exposure Criteria for Soil								
Residential	mg/Kg	2,500	1,400	3,900 (100 Cr ⁺⁶)				
Industrial	mg/Kg	76,000	7,500	51,000 (100 Cr ⁺⁶)				
Connecticut Pollutant Mobility Criteria								
GA	SPLP (mg/L)				1.3	0.1	0.05	
GB	SPLP (mg/L)				13	1.0	0.5	
Surface Water Protection Criteria								
					mg/L	0.048	0.880	1.20

TABLE 2
GROUNDWATER MONITORING DATA
(mg/L)

		MW1	MW3 ¹	MW4 ¹	MW6	MW7	Average ²
Oct. 2007	Nickel	0.0046	0.015	0.13	0.25	0.60	0.249
	Copper	<0.002	0.011	0.032	0.040	0.012	0.024
July 2007	Nickel	0.002	0.0096	0.042	0.20	0.30	0.138
	Copper	<0.002	<0.002	0.016	0.022	0.0094	0.012
April 2007	Nickel	<0.002	0.04	0.14	0.25	0.38	0.203
	Copper	<0.002	0.010	0.11	0.038	0.016	0.044
Jan. 2007	Nickel	<0.01	0.018	0.14	0.38	0.44	0.244
	Copper	<0.002	<0.010	0.076	0.053	0.018	0.039
Four Quarter Copper Average (Surface Water Protection Criterion = 0.048 mg/L)							0.030
Four quarter Nickel Average (Surface Water Protection Criterion = 0.880 mg/L)							0.209

Notes:

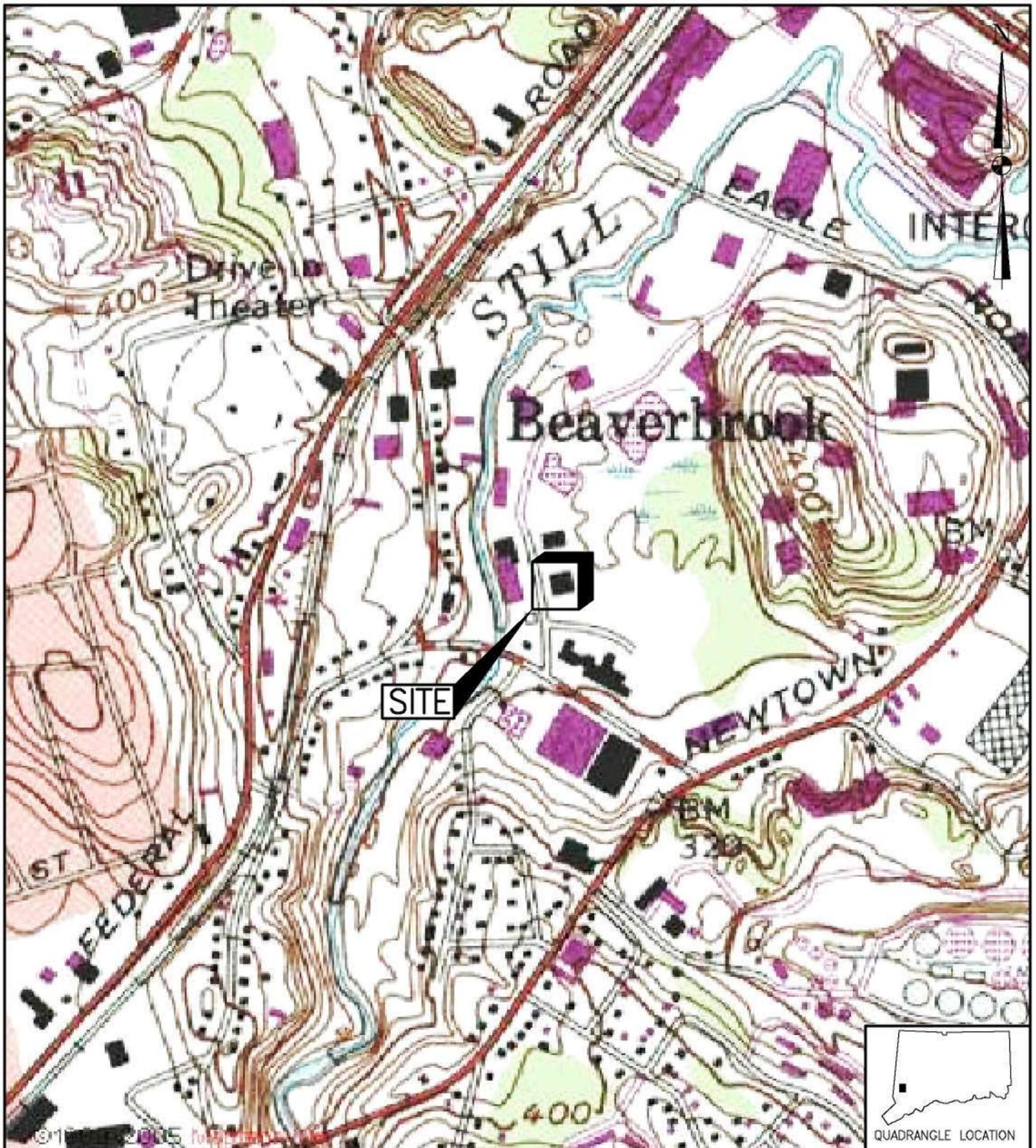
¹ Well MW 5 monitors a deeper zone. Therefore, data from this well is not relevant to the evaluation. Well MW 2 is considered duplicative and has not been monitored for many years. Well MW 1 is up-gradient. All other wells are considered down-gradient.

² Average of the four down-gradient wells.

FIGURES

ATTACHMENT A

Laboratory Results/ Chain of Custody Forms



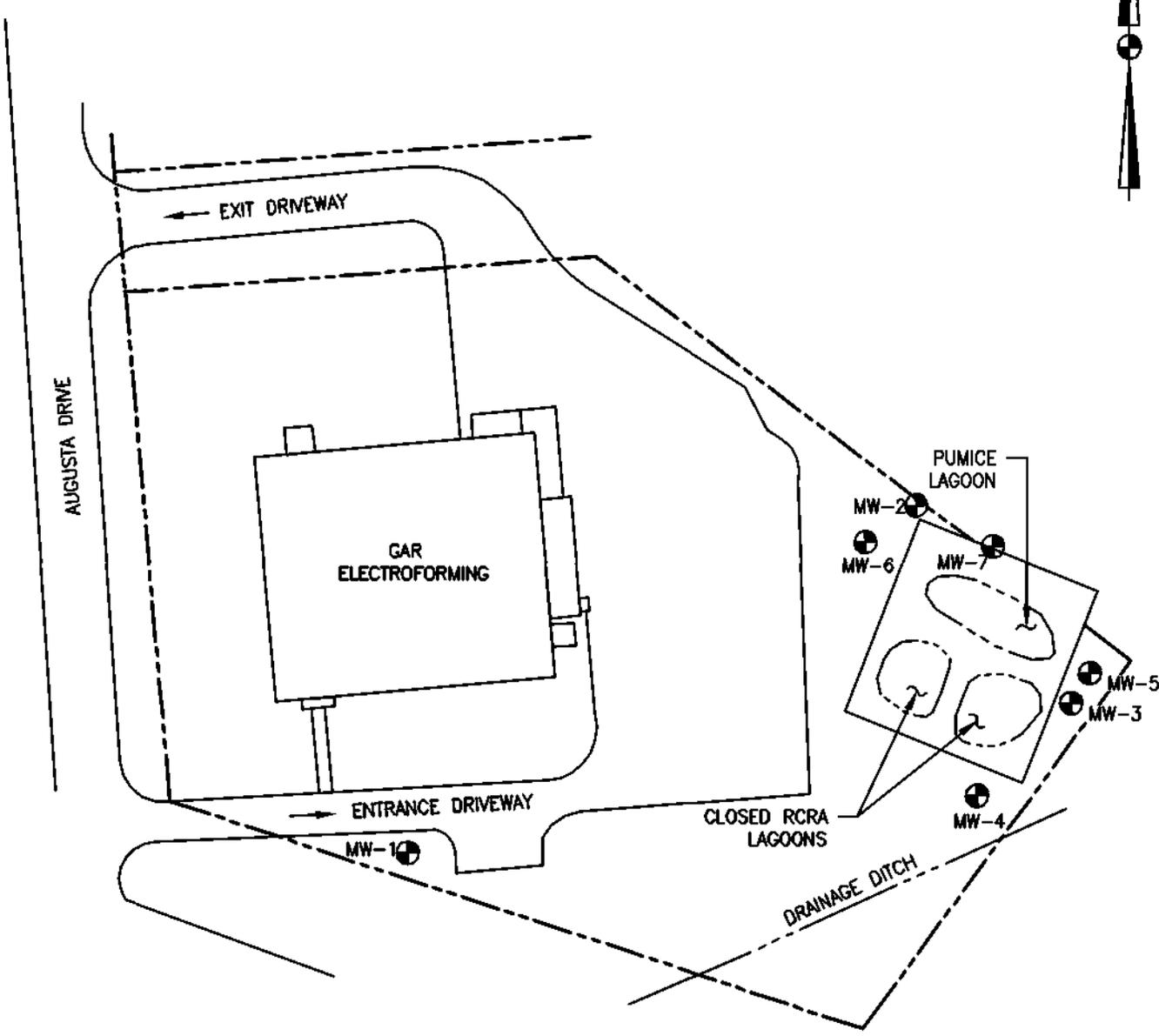
REFERENCE: USGS 7.5' QUADRANGLE MAP OF: DANBURY, CONNECTICUT; DATED 1963, PHOTOREVISED 1972.

DRAWN BY	DJF
DATE	11/21/06
CHECKED BY	RAD
SET JOB NO.	205127
SET DWG FILE	GAR_ELEcm01.dwg
DRAWING SCALE	N.T.S.



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GAR ELECTROFORMING	
RCRA INTERIM CORRECTIVE MEASURES SITE LOCATION MAP	
DRAWING NO.	FIGURE 1
REV.	0

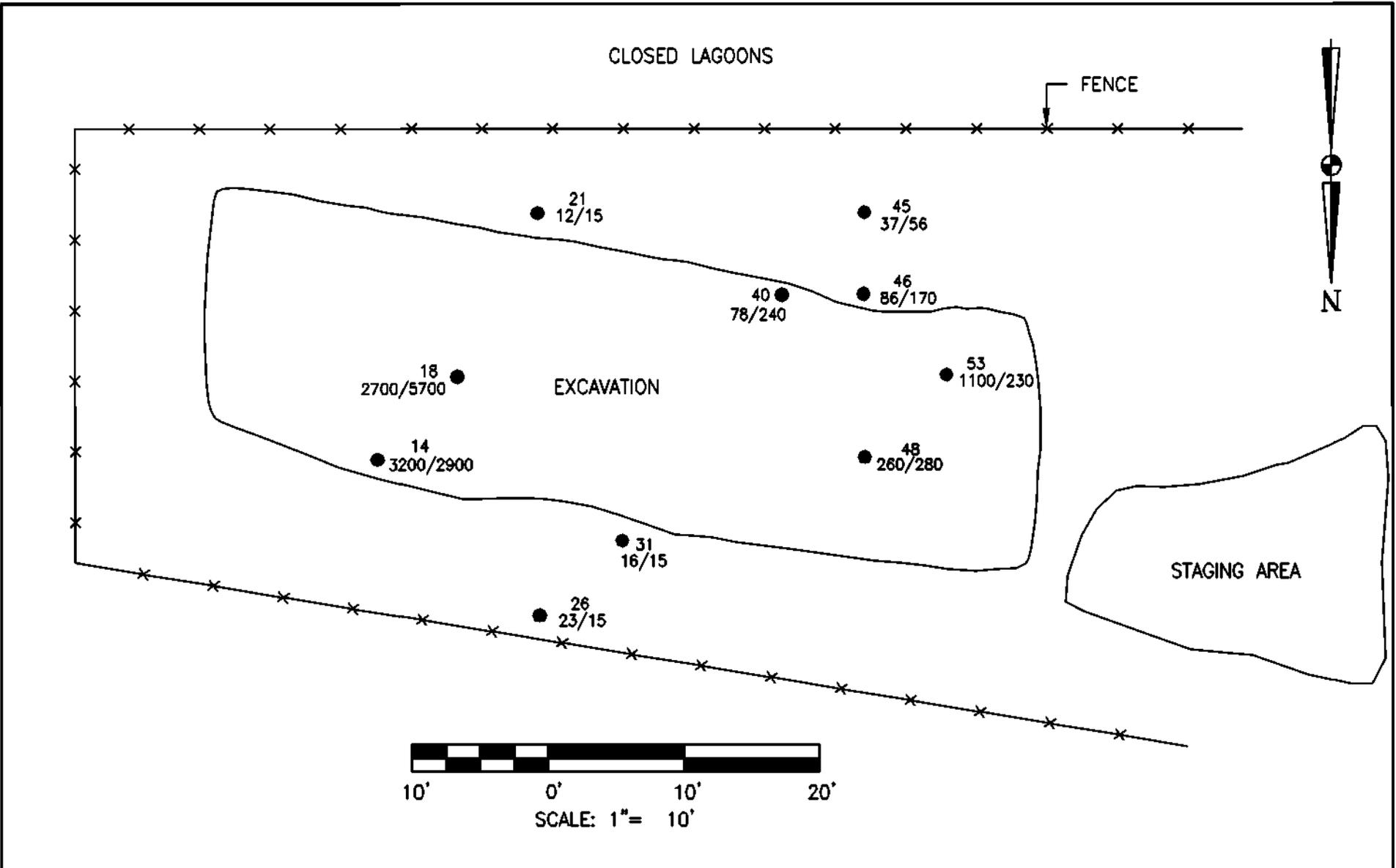


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DATE	11/21/06
CHECKED BY	RAD
SET JOB NO.	205127
SET DWG FILE	GAR_ELECa01.dwg
DRAWING SCALE	N.T.S.



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GAR ELECTROFORMING	
RCRA INTERIM CORRECTIVE MEASURES	
SITE LAYOUT	
DRAWING NAME	FIGURE 2
REV.	0

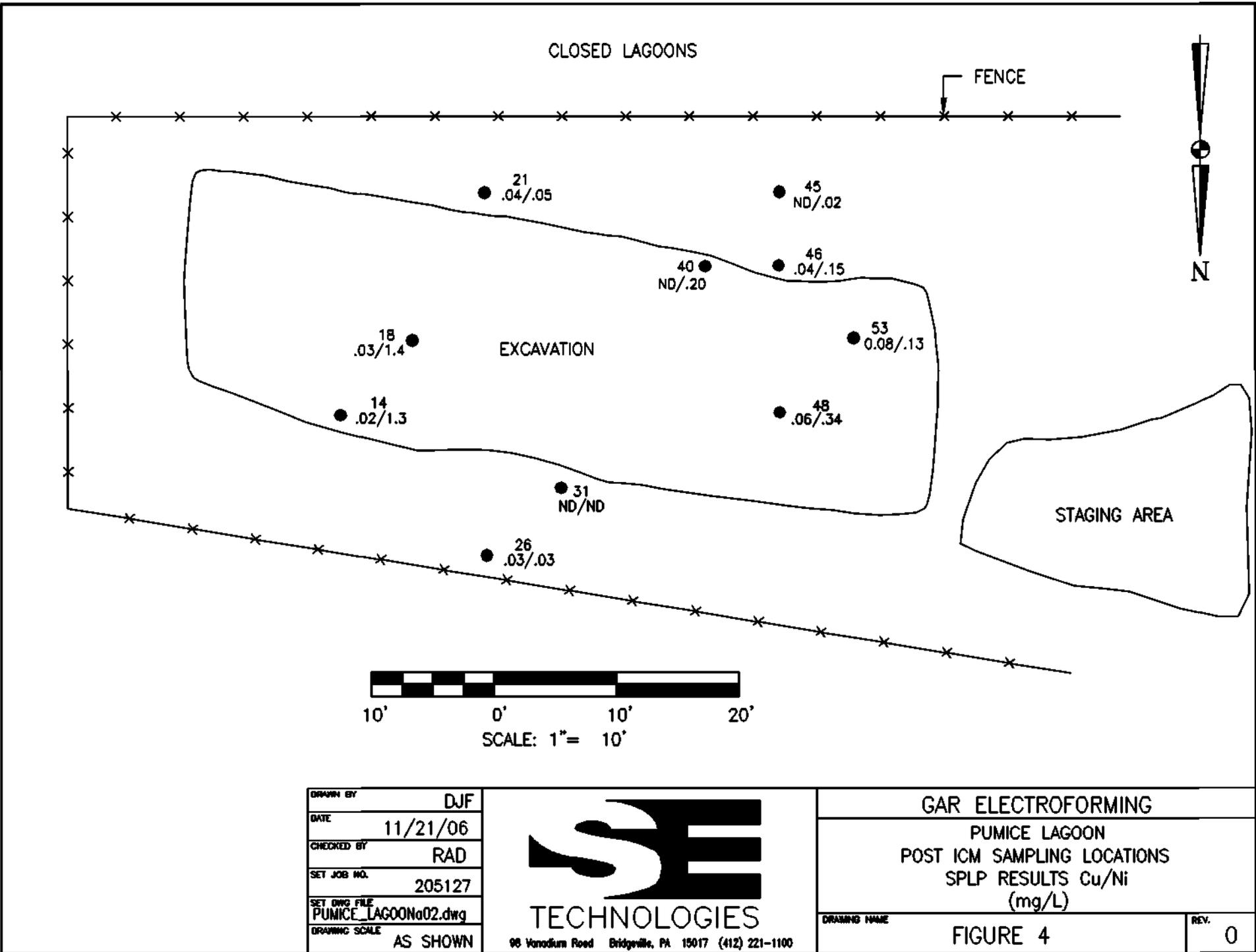


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DATE	11/21/06
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SET JOB NO.	205127
SET DWG FILE	PUMICE_LAGOONa01.dwg
DRAWING SCALE	AS SHOWN

SE
TECHNOLOGIES

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GAR ELECTROFORMING	
PUMICE LAGOON	
POST ICM SAMPLING LOCATIONS	
TOTAL METALS Cu/Ni (mg/kg)	
DRAWING NAME	FIGURE 3
REV.	0



ATTACHMENT A

Laboratory Results/ Chain of Custody Forms



Premier
Laboratory, LLC

61 Louisa Viens Drive
Dayville, CT 06241
FAX: 860-774-2689
860-774-6814 800-932-1150

ANALYTICAL DATA REPORT

Report Number: E606897

Project: Tree Samples

prepared for:

GAR Electroforming Division
Electroformers, Inc.
P.O. Box 340
Danbury, CT 06813-0340
Attn: Todd Ray

Received Date: 6/13/2006

Report Date: 6/20/2006

Premier Laboratory, LLC
Authorized Signature



Certifications:

CT (PL-0465), MA (M-CT008), ME (CT050), NH (2020), NJ (CT002), NY (11549), RI (RI246)



Premier
Laboratory, LLC

61 Louisa Viens Drive
Dayville, CT 06241
FAX: 860-774-2689
860-774-6814 800-932-1150

Report No: E606897
Client: GAR Electroforming Division
Project: Tree Samples

CASE NARRATIVE / METHOD CONFORMANCE SUMMARY

Premier Laboratory received three samples from GAR Electroforming Division on 06/13/2006. The samples were analyzed from the following list of analyses:

Trace RCRA (8) Heavy Metals in Solids
6010B[3000], 7471[7471]

Variances:

SDG:

None reported.

Method:

None reported.

QA/QC:

None reported.

INORGANIC ANALYSIS DATA SHEET

Laboratory: Premier Laboratory, LLC
 PL Report No: E606897
 Date Received: 6/13/2006

Customer: GAR Electroforming Division
 Location: Danbury, CT
 Project: Tree Samples

Parameter	Result	DL	Units	Completed	By	Dilution
(1) Tree #1 Leaves South Left						
Date Collected: 6/13/2006 Matrix: Other						
Trace Metals by 6010B						
Arsenic	ND	0.25	mg/kg	06/16/06 12:46	BSZ	
Barium	12	0.50	mg/kg	06/16/06 12:46	BSZ	
Cadmium	0.52	0.10	mg/kg	06/16/06 12:46	BSZ	
Chromium	0.25	0.25	mg/kg	06/16/06 12:46	BSZ	
Lead	0.39	0.20	mg/kg	06/16/06 12:46	BSZ	
Selenium	ND	0.50	mg/kg	06/16/06 12:46	BSZ	
Silver	1.2	0.20	mg/kg	06/16/06 12:46	BSZ	
Nickel	0.60	0.50	mg/kg	06/16/06 12:46	BSZ	
Mercury by SW-846 7471 in SW	ND	0.020	mg/kg	06/20/06	AM	
(2) Tree #2 Leaves South Central						
Date Collected: 6/13/2006 Matrix: Other						
Trace Metals by 6010B						
Arsenic	ND	0.50	mg/kg	06/16/06	BSZ	
Barium	1.3	0.50	mg/kg	06/16/06	BSZ	
Cadmium	ND	0.10	mg/kg	06/16/06	BSZ	
Chromium	ND	0.50	mg/kg	06/16/06	BSZ	
Lead	ND	0.20	mg/kg	06/16/06	BSZ	
Selenium	1.3	0.50	mg/kg	06/16/06	BSZ	
Silver	0.58	0.20	mg/kg	06/16/06	BSZ	
Nickel	1.4	0.50	mg/kg	06/16/06	BSZ	
Mercury by SW-846 7471 in SW	ND	0.020	mg/kg	06/20/06	AM	
(3) Tree #3 Branch South Central						
Date Collected: 6/13/2006 Matrix: Other						
Trace Metals by 6010B						
Arsenic	ND	0.50	mg/kg	06/16/06	BSZ	
Barium	1.4	0.50	mg/kg	06/16/06	BSZ	
Cadmium	0.14	0.10	mg/kg	06/16/06	BSZ	
Chromium	0.90	0.50	mg/kg	06/16/06	BSZ	
Lead	ND	0.20	mg/kg	06/16/06	BSZ	
Selenium	ND	0.50	mg/kg	06/16/06	BSZ	
Silver	0.36	0.20	mg/kg	06/16/06	BSZ	
Nickel	ND	0.50	mg/kg	06/16/06	BSZ	

INORGANIC ANALYSIS DATA SHEET

Laboratory: Premier Laboratory, LLC
PL Report No: E606897
Date Received: 6/13/2006

Customer: GAR Electroforming Division
Location: Danbury, CT
Project: Tree Samples

<u>Parameter</u>	<u>Result</u>	<u>DL</u>	<u>Units</u>	<u>Completed</u>	<u>By</u>	<u>Dilution</u>
(3) Tree #3 Branch South Central (continued)						
Date Collected: 6/13/2006 Matrix: Other						
Mercury by SW-846 7471 in SW	ND	0.020	mg/kg	06/20/06	AM	



Premier Laboratory, LLC

CHAIN OF CUSTODY

www.PremierLaboratory.com

SHADED AREAS FOR LAB USE ONLY

Lab WO# E606897

Project Manager _____

Handwritten initials

COPY OF REPORT TO

CUSTOMER: _____

ADDRESS: _____

ATTENTION: _____

E-MAIL: _____

PHONE: _____ FAX: _____

BILLING INFORMATION

BILL TO: Gap Electroforming Division

ADDRESS: _____

ATTENTION: _____

TELEPHONE: _____

PURCHASE ORDER #: _____

PROJECT INFORMATION

PROJECT: Tree Samples

PROJECT LOCATION: Danbury STATE: CT

PROJECT MANAGER: _____
IN CASE WE HAVE ANY QUESTIONS WHEN SAMPLES ARRIVE WE SHOULD CALL:

E-MAIL: _____

TELEPHONE: _____

FAX: _____

SAMPLE IDENTIFICATION	DATE COLLECTED	TIME COLLECTED	SAMPLE TYPE		SAMPLE MATRIX	# OF BOTTLES	PCRA'S	GAS	ANALYSIS					PRESERVATIVES												
			COMPOSITE	GRAS																						
Tree #1 Leaves <i>South Leaf</i>	6-13-2006	11:10		X	Other	1																				
Tree #2 Leaves <i>South Leaf</i>	6-13-2006	11:23		X	↓	1																				
Tree #3 Wood Branch <i>South Central</i>	6-13-2006	10:55		X	↓	1																				

CUSTODY TRANSFER

SAMPLER: *Chris Wilson*

DATE: 6-13-2006 TIME: 10:55

TURNAROUND (INDICATE IN CALENDAR DAYS): _____ FAX _____ HARD COPY _____ E-MAIL _____
EXPEDITED SERVICE MAY BE SUBJECT TO SURCHARGE

RECEIVED: _____

COMMENTS: _____

RELINQUISHED: _____

RECEIVED: _____

RELINQUISHED: *Chris Wilson*

DATE: 6-13-2006 TIME: 18:39
DATE: 6/13/06 TIME: 18:39

CONDITIONS UPON RECEIPT: (Check One)

RECEIVED: _____

Cooled Ambient

7.2 °C Upon Receipt at Lab

SEE REVERSE SIDE FOR TERMS AND CONDITIONS

PAGE 1 of 1



Premier
Laboratory, LLC

61 Louisa Viens Drive
Dayville, CT 06241
FAX: 860-774-2689
860-774-6814 800-932-1150

ANALYTICAL DATA REPORT

Report Number: E609F02

Project: Pumice Lagoon

prepared for:

S E Technologies
98 Vanadium Road
Bridgeville, PA 15017

Attn: Roger Dhonau

Received Date: 9/25/2006

Report Date: 9/29/2006

Premier Laboratory, LLC
Authorized Signature



Certifications:
CT (PH-0465), MA (M-CT008), ME (CT050), NH (2020), NJ (CT002), NY (11549), RI (RI246)



Report No: E609F02
Client: S E Technologies
Project: Pumice Lagoon

CASE NARRATIVE / METHOD CONFORMANCE SUMMARY

Premier Laboratory received 10 samples from S E Technologies on 09/25/2006. The samples were analyzed from the following list of analyses:

Moisture, Percent
Trace Metals by 6010B
6010B[3000]

SPLP Metals by SW-846
6010B[3000]

Variations:

SDG:

None reported.

Method:

None reported.

QA/QC:

None reported.

INORGANIC ANALYSIS DATA SHEET

Laboratory: Premier Laboratory, LLC
 PL Report No: E609F02
 Date Received: 9/25/2006

Customer: S E Technologies
 Location: Danbury, CT
 Project: Pumice Lagoon

Parameter	Result	DL	Units	Completed	By	Dilution
(1) 53						
Date Collected: 9/23/2006 Matrix: Solid						
Metals by ICP by SW-846 6010B, SPLP						
Copper	0.080	0.024	mg/L	09/28/06	BSZ	
Chromium	ND	0.024	mg/L	09/28/06	BSZ	
Nickel	0.13	0.024	mg/L	09/28/06	BSZ	
Trace Metals by 6010B						
Chromium	28	0.63	mg/kg	09/27/06	BSZ	
Nickel	230	0.63	mg/kg	09/27/06	BSZ	
Copper	1100	6.3	mg/kg	09/28/06	BSZ	5
(2) 18						
Date Collected: 9/23/2006 Matrix: Solid						
Metals by ICP by SW-846 6010B, SPLP						
Copper	0.029	0.024	mg/L	09/28/06	BSZ	
Chromium	ND	0.024	mg/L	09/28/06	BSZ	
Nickel	1.4	0.024	mg/L	09/28/06	BSZ	
Trace Metals by 6010B						
Chromium	69	0.65	mg/kg	09/27/06	BSZ	
Nickel	5700	13	mg/kg	09/28/06	BSZ	10
Copper	2700	13	mg/kg	09/28/06	BSZ	10
(3) 40						
Date Collected: 9/23/2006 Matrix: Solid						
Metals by ICP by SW-846 6010B, SPLP						
Copper	ND	0.024	mg/L	09/28/06	BSZ	
Chromium	ND	0.024	mg/L	09/28/06	BSZ	
Nickel	0.20	0.024	mg/L	09/28/06	BSZ	
Trace Metals by 6010B						
Chromium	11	0.58	mg/kg	09/27/06	BSZ	
Nickel	240	0.58	mg/kg	09/27/06	BSZ	
Copper	78	0.58	mg/kg	09/27/06	BSZ	
(4) 48						
Date Collected: 9/23/2006 Matrix: Solid						
Metals by ICP by SW-846 6010B, SPLP						
Copper	0.062	0.024	mg/L	09/28/06	BSZ	
Chromium	ND	0.024	mg/L	09/28/06	BSZ	
Nickel	0.34	0.024	mg/L	09/28/06	BSZ	

INORGANIC ANALYSIS DATA SHEET

Laboratory: Premier Laboratory, LLC
 PL Report No: E609F02
 Date Received: 9/25/2006

Customer: S E Technologies
 Location: Danbury, CT
 Project: Pumice Lagoon

Parameter	Result	DL	Units	Completed	By	Dilution
(4) 48 (continued)						
Date Collected: 9/23/2006		Matrix: Solid				
Trace Metals by 6010B						
Chromium	17	0.59	mg/kg	09/27/06	BSZ	
Nickel	280	0.59	mg/kg	09/27/06	BSZ	
Copper	260	0.59	mg/kg	09/27/06	BSZ	
(5) 14						
Date Collected: 9/23/2006		Matrix: Solid				
Metals by ICP by SW-846 6010B, SPLP						
Copper	0.028	0.024	mg/L	09/28/06	BSZ	
Chromium	ND	0.024	mg/L	09/28/06	BSZ	
Nickel	1.3	0.024	mg/L	09/28/06	BSZ	
Trace Metals by 6010B						
Chromium	22	0.66	mg/kg	09/27/06	BSZ	
Nickel	2900	13	mg/kg	09/28/06	BSZ	10
Copper	3200	13	mg/kg	09/28/06	BSZ	10
(6) 45						
Date Collected: 9/23/2006		Matrix: Solid				
Metals by ICP by SW-846 6010B, SPLP						
Copper	ND	0.024	mg/L	09/28/06	BSZ	
Chromium	ND	0.024	mg/L	09/28/06	BSZ	
Nickel	0.025	0.024	mg/L	09/28/06	BSZ	
Trace Metals by 6010B						
Chromium	10	0.90	mg/kg	09/27/06	BSZ	
Nickel	56	0.90	mg/kg	09/27/06	BSZ	
Copper	37	0.90	mg/kg	09/27/06	BSZ	
(7) 21						
Date Collected: 9/23/2006		Matrix: Solid				
Metals by ICP by SW-846 6010B, SPLP						
Copper	0.046	0.024	mg/L	09/28/06	BSZ	
Chromium	ND	0.024	mg/L	09/28/06	BSZ	
Nickel	0.056	0.024	mg/L	09/28/06	BSZ	
Trace Metals by 6010B						
Chromium	6.0	0.55	mg/kg	09/27/06	BSZ	
Nickel	15	0.55	mg/kg	09/27/06	BSZ	
Copper	12	0.55	mg/kg	09/27/06	BSZ	

INORGANIC ANALYSIS DATA SHEET

Laboratory: Premier Laboratory, LLC
 PL Report No: E609F02
 Date Received: 9/25/2006

Customer: S E Technologies
 Location: Danbury, CT
 Project: Pumice Lagoon

Parameter	Result	DL	Units	Completed	By Dilution
(8) 26					
Date Collected: 9/23/2006 Matrix: Solid					
Metals by ICP by SW-846 6010B, SPLP					
Copper	0.035	0.024	mg/L	09/28/06	BSZ
Chromium	ND	0.024	mg/L	09/28/06	BSZ
Nickel	0.029	0.024	mg/L	09/28/06	BSZ
Trace Metals by 6010B					
Chromium	13	0.61	mg/kg	09/27/06	BSZ
Nickel	15	0.61	mg/kg	09/27/06	BSZ
Copper	23	0.61	mg/kg	09/27/06	BSZ
(9) 46					
Date Collected: 9/23/2006 Matrix: Solid					
Metals by ICP by SW-846 6010B, SPLP					
Copper	0.039	0.024	mg/L	09/28/06	BSZ
Chromium	ND	0.024	mg/L	09/28/06	BSZ
Nickel	0.15	0.024	mg/L	09/28/06	BSZ
Trace Metals by 6010B					
Chromium	22	1.2	mg/kg	09/28/06	BSZ
Nickel	170	1.2	mg/kg	09/28/06	BSZ
Copper	86	1.2	mg/kg	09/28/06	BSZ
(10) 31					
Date Collected: 9/23/2006 Matrix: Solid					
Metals by ICP by SW-846 6010B, SPLP					
Copper	ND	0.024	mg/L	09/28/06	BSZ
Chromium	ND	0.024	mg/L	09/28/06	BSZ
Nickel	ND	0.024	mg/L	09/28/06	BSZ
Trace Metals by 6010B					
Chromium	19	1.3	mg/kg	09/28/06	BSZ
Nickel	15	1.3	mg/kg	09/28/06	BSZ
Copper	16	1.3	mg/kg	09/28/06	BSZ



Premier Laboratory, LLC.

61 Louisa Viens Drive
Dayville, CT 06241
(800) 334-0103

Chain of Custody

WWW.PREMIERLABORATORY.COM

Lab WO#: E609F02

Project Manager: [Signature]

PAGE 01

PREMIER LAB

8607799017

09/22/2006 14:15

Copy of Report To	Billing Information	Project Information
CUSTOMER: <u>Roger Dhanaw, SE Tech</u>	BILL TO: <u>George Ray G&R Electroforming</u>	Project: <u>Pumice Leach</u>
ADDRESS: <u>98 Vanadium Rd, Bldg D</u> <u>Bridgeville, PA 15014</u>	ADDRESS: <u>11 AUGUSTA DRIVE</u> <u>COMMERCIAL PARK DANBURY, CT</u>	Project Location: <u>Danbury, CT</u>
ATTENTION:	ATTENTION: <u>George Ray</u>	Project Manager: <u>Roger Dhanaw</u>
E-MAIL:	TELEPHONE: <u>(203) 744-2000</u>	E-MAIL: <u>rdhanaw@vanadium.com</u>
PHONE: _____ Fax: _____	PURCHASE ORDER #:	TELEPHONE: <u>412/221-1100 EXT 1628</u>
		FAX: <u>412/257-6103</u>

Sample Identification	Date Collected	Time Collected	Sample Type		Sample Matrix	Preservative	Analysis	Preservative						
			COMPOSITE	GRAB				PRESV1	PRESV2	PRESV3	PRESV4	PRESV5		
53	9/23	1330		X	Soil									
18	9/23	1342												
40	9/23	1318												
48	9/23	1307												
14	9/23	1334												
45	9/23	1320												
21	9/23	1346												
26	9/23	1336												
46	9/23	1305												
31	9/23	1315												

CUSTODY TRANSFER	DATE	TIME
SAMPLER: <u>Roger Dhanaw</u>	<u>9/23/06</u>	<u>2:120</u>
RECEIVED: <u>[Signature]</u>	<u>9/23/06</u>	<u>2:25</u>
RELINQUISHED:		
RECEIVED:		
RELINQUISHED:		
RECEIVED: <u>P. Laderec</u>	<u>9/23/06</u>	<u>14:25</u>

TURNAROUND (INDICATE IN CALENDAR DAYS):
 _____ FAX _____ HARD COPY _____ E-MAIL
 EXPEDITED SERVICE MAY BE SUBJECT TO SURCHARGE

COMMENTS: Std. Turn

CONDITIONS UPON RECEIPT: (CHECK ONE)
 COOLED AMBIENT _____ °C Upon Receipt at LAB



61 Louisa Viens Drive
Dayville, CT 06241
(800) 334-0103

Chain of Custody

WWW.PREMIERLABORATORY.COM

Lab WO#: EG09F02

Project Manager: _____

PAGE 01

Copy of Report To		Billing Information		Project Information	
CUSTOMER:	<u>Roger D'Onofrio, SE Tech</u>	BILL TO:	<u>George Jay GAR Electroforming</u>	Project:	<u>Purified Uranium</u>
ADDRESS:	<u>98 Vanadium Rd, Bldg D</u> <u>Bridgville, PA 15017</u>	ADDRESS:	<u>11 AUGUSTA DRIVE</u> <u>COMMERCIAL PARK DANBURY, CT.</u>	Project Location:	<u>Danbury, CT</u>
ATTENTION:		ATTENTION:	<u>George Jay</u>	Project Manager:	<u>Roger D'Onofrio</u>
E-MAIL:		TELEPHONE:	<u>(203) 744-2006</u>	IN CASE WE HAVE ANY QUESTIONS WHEN SAMPLES ARRIVE WE SHOULD CALL:	
PHONE:	Fax: _____	PURCHASE ORDER #:		E-MAIL:	<u>rdonofrio@vanadium.com</u>
				TELEPHONE:	<u>412/221-1100 Ext 1628</u>
				FAX:	<u>412/257-6103</u>

PREMIER LAB

8607799017

Sample Identification	Date Collected	Time Collected	Sample Type		Sample Matrix	Analysis					Preservatives							
			COMPOSITE	GRAB		As	U	Th	Pa	Bi	Mo	Am	NaOH	HNO3	NaOH	MeOH		
53	9/23	1330		X	Soil	X	X	X	X									
18	9/23	1342																
40	9/23	1318																
48	9/23	1307																
14	9/23	1334																
45	9/23	1320																
21	9/23	1346																
26	9/23	1336																
46	9/23	1305																
31	9/23	1315																

09/22/2006 14:15

CUSTODY TRANSFER		DATE	TIME
SAMPLER:	<u>Roger D'Onofrio</u>	<u>9/23/06</u>	<u>2:120</u>
RECEIVED:	<u>[Signature]</u>	<u>9/23/06</u>	<u>2:25</u>
RELINQUISHED:			
RECEIVED:			
RELINQUISHED:			
RECEIVED:	<u>P. Ladero</u>	<u>9/23/06</u>	<u>1425</u>

TURNAROUND (INDICATE IN CALENDAR DAYS):
 _____ FAX _____ HARD COPY _____ E-MAIL _____

EXPEDITED SERVICE MAY BE SUBJECT TO SURCHARGE

COMMENTS: Std. Turn
* added per Roger 9/25/06 per

CONDITIONS UPON RECEIPT: (CHECK ONE)
 COOLED AMBIENT _____ °C Upon Receipt at LAB

ATTACHMENT B

Soil and Waste Disposal Documentation

88313

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number CTD064834914	2. Page 1 of 1	3. Emergency Response Phone (450) 430 9230	4. Manifest Tracking Number 001550521 JJK		
5. Generator's Name and Mailing Address Gulf Electroforming Div. P.O. Box 340 Danbury, Connecticut 06813 Generator's Phone: 203-744-4300			Generator's Site Address (if different than mailing address) 11 Augusta Dr. Danbury, Connecticut 06813				
6. Transporter 1 Company Name Transport Rolley Inc			450-652-4282	U.S. EPA ID Number NYF006000053			
7. Transporter 2 Company Name			U.S. EPA ID Number				
8. Designated Facility Name and Site Address Stablex Canada Inc 7600 St. Industrial Blainville, Quebec J7E 3V4 Facility's Phone: (450) 430-9230			U.S. EPA ID Number TR00007807 NYD980756415				
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No. Type		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
	X	RQ. Waste Environmentally hazardous substances Solid, nps. (nickel) 9 UN 3077 III	001 DT		Est. 44560	P	F006
	2.						
	3.						
	4.						
14. Special Handling Instructions and Additional Information Marsulex acting as an intermediary arranging for export.							
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.							
Generator's/Officer's Printed/Typed Name Russell Richter			Signature <i>Russell Richter</i>			Month Day Year 10 06 27 06	
16. International Shipments <input type="checkbox"/> Import to U.S. <input checked="" type="checkbox"/> Export from U.S.		Port of entry/exit: Champlain NY		Date leaving U.S.: Sept. 27-06			
17. Transporter Acknowledgment of Receipt of Materials							
Transporter 1 Printed/Typed Name Norman J Raymond			Signature <i>Norman J Raymond</i>			Month Day Year 10 09 27 06	
Transporter 2 Printed/Typed Name			Signature			Month Day Year	
18. Discrepancy							
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection NS = 451316 P.							
18b. Alternate Facility (or Generator) Manifest Reference Number: U.S. EPA ID Number							
18c. Signature of Alternate Facility (or Generator) end of T23 end of T25 or T27 or T29 (Pl. Cells) end of T21, T22, T23, T29 (Pl. Cells)							
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)							
1. All waste		2.		3.		4.	
20. Designated Facility Owner or Operator. Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a							
Printed/Typed Name Eric Beauchamp			Signature <i>Eric Beauchamp</i>			Month Day Year 09 27 06	

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete. DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

Peter Lavelle

88312

ease print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved, OMB No. 2060-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number CTD064834914	2. Page 1 of 1	3. Emergency Response Phone (450) 430-9230 ext. 275	4. Manifest Tracking Number 000304289 JJK
5. Generator's Name and Mailing Address GAR ELECTROFORMING DIV P.O. Box 240 Danbury, Connecticut 06813			Generator's Site Address (if different than mailing address) 11 Augusta Dr. Danbury, Connecticut 06813		
6. Transporter 1 Company Name NEW ENGLAND DISPOSAL TECHNOLOGIES			U.S. EPA ID Number MAR000504860		(605) 758-1329
7. Transporter 2 Company Name			U.S. EPA ID Number		
8. Designated Facility Name and Site Address STABLEX CANADA INC. 780, boul. Industriel Blainville, Quebec J7C 8V4			U.S. EPA ID Number TR: 00007607		Facility's Phone: (450) 430-8230 NYD980758415
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No. Type		11. Total Quantity	12. Unit Wt./Vol.
X	1. RQ Waste environmentally hazardous substances, solid, n.o.s. (nickel) 9 UN3077 III	CM		E-1400 P 201	FO06
	2.				
	3.				
	4.				
14. Special Handling Instructions and Additional Information Manifest acting as an intermediary arranging for export					
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.					
Generator's/Offeror's Printed/Typed Name GEORGE RAY		Signature		Month Day Year 11 25 06	
16. International Shipments <input type="checkbox"/> Import to U.S. <input checked="" type="checkbox"/> Export from U.S.		Port of entry/exit: London Date leaving U.S.: 9/25/06			
17. Transporter Acknowledgment of Receipt of Materials					
Transporter 1 Printed/Typed Name Peter Lavelle		Signature		Month Day Year 10 9 25 06	
Transporter 2 Printed/Typed Name		Signature		Month Day Year	
18. Discrepancy					
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection 0-48798 P					
18b. Alternate Facility (or Generator)				U.S. EPA ID Number	
18c. Signature of Alternate Facility (or Generator)					
9. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)					
and/or T21, T31, T39, D99 (Pl. Cells)		3.		4.	
0. Designated Facility/Designated Operation (or other) of receipt of hazardous materials covered by the manifest except as noted in Item 18a					
Printed/Typed Name FRANCO TREPAILLER		Signature		Month Day Year 11 25 06	

JONATHAN LEET

88311

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number CTD06483491a	2. Page 1 of 1	3. Emergency Response Phone (450) 430-9230 ext. 275	4. Manifest Tracking Number 000304290 JJK
5. Generator's Name and Mailing Address GAR ELECTROFORMING DIV. P.O. Box 340 Danbury, Connecticut 06813 Generator's Phone:			Generator's Site Address (if different than mailing address) 11 Augusta Dr. Danbury, Connecticut 06813		
6. Transporter 1 Company Name NEW ENGLAND DISPOSAL TECHNOLOGIES			U.S. EPA ID Number MAR000504660		(508) 756-1339
7. Transporter 2 Company Name			U.S. EPA ID Number		
8. Designated Facility Name and Site Address STABLEX CANADA INC. 760, boul. Industriel Blainville, Quebec J7C 3V4 Facility's Phone: (460) 430-9230			U.S. EPA ID Number NYD980756415		TR: 00007807
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity
	X	1. RQ Waste environmentally hazardous substances, sold, n.o.s. (nickel) 9 UN3077 III	No.	Type	EST 40,000
				CM	P
13. Waste Codes					
14. Special Handling Instructions and Additional Information Marsulex acting as an intermediary arranging for export					
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.					
Generator's/Officer's Printed/Typed Name GEORGE RAY			Signature <i>George Ray</i>		Month Day Year 11 15 11
16. International Shipments <input type="checkbox"/> Import to U.S. <input checked="" type="checkbox"/> Export from U.S. Port of entry/exit: LAQUELLE QC Date leaving U.S.: 9-26-06					
17. Transporter Acknowledgment of Receipt of Materials					
Transporter 1 Printed/Typed Name JONATHAN D. LEET			Signature <i>Jonathan D. Leet</i>		Month Day Year 10 25 06
Transporter 2 Printed/Typed Name			Signature		Month Day Year
18. Discrepancy					
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection					
18b. Alternate Facility (or Generator) U.S. EPA ID Number					
Facility's Phone:					
18c. Signature of Alternate Facility (or Generator)					Month Day Year
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)					
1. and/or T21, T31, T39, D99 (Fl. Cells)		3.		4.	
20. Designated Facility (or other Special Circumstances) Receipt of hazardous materials covered by the manifest except as noted in Item 18a					
Printed/Typed Name FRANK TRAMER			Signature <i>Frank Tramer</i>		Month Day Year 11 15 11

GENERATOR

TRANSPORTER INTL.

DESIGNATED FACILITY

88284

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator ID Number CTD064834914	2. Page 1 of 1	3. Emergency Response Phone (450) 450-9230 ext. 275	4. Manifest Tracking Number 000304291 JJK
----------------------------------	---	--------------------------	---	---

5. Generator's Name and Mailing Address GAR ELECTROFORMING DIV. P.O. Box 340 Danbury, Connecticut 06813	Generator's Site Address (if different than mailing address) 11 Augusta Dr. Danbury, Connecticut 06813
---	---

6. Transporter 1 Company Name TRANSPORT ROILEX LEE	U.S. EPA ID Number NYF006000055
7. Transporter 2 Company Name	U.S. EPA ID Number

8. Designated Facility Name and Site Address STABLEX CANADA INC. 780, boul. industriel Saint-Jovite, Québec J7C 3V4 Facility's Phone: (450) 430-9230	U.S. EPA ID Number NYD980756415
--	---

9a. HM	9b. U.S. DOT Description (Including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
		No.	Type					
X	1. RQ waste environmentally hazardous substances, solid, n.c.s. (nickel) 9 UN3077 III	01	CM	EST. 40000	P	7006		
	2.							
	3.							
	4.							

14. Special Handling Instructions and Additional Information
Wastebox acting as an intermediary arranging for export

15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Officer's Printed/Typed Name GEORGE RAY	Signature 	Month 09	Day 25	Year 06
---	---------------	--------------------	------------------	-------------------

16. International Shipments <input type="checkbox"/> Import to U.S. <input checked="" type="checkbox"/> Export from U.S.	Port of entry/exit: CHAMPLAIN UK
Transporter signature (for exports only):	Date leaving U.S.: 09-25-06

17. Transporter Acknowledgment of Receipt of Materials	Signature 	Month 09	Day 25	Year 06
Transporter 1 Printed/Typed Name DENIS SAVARD	Signature	Month	Day	Year
Transporter 2 Printed/Typed Name	Signature	Month	Day	Year

18. Discrepancy	18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection
	N: 45046 P.
	Manifest Reference Number:

18b. Alternate Facility (or Generator)	U.S. EPA ID Number
Facility's Phone:	

18c. Signature of Alternate Facility (or Generator)	Month 09	Day 25	Year 06
---	--------------------	------------------	-------------------

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)	1. 210	2. 121, 131, 130, 150, 11, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99, 00	3.	4.
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20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 48a	Signature 	Month 09	Day 25	Year 06
--	---------------	--------------------	------------------	-------------------

88315

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved, OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number CTD064834914	2. Page 1 of 1	3. Emergency Response Phone (450) 430-9230 ext. 275	4. Manifest Tracking Number 000304293 JJK			
5. Generator's Name and Mailing Address GAR ELECTROFORMING DIV P.O. Box 340 Danbury, Connecticut 06813			Generator's Site Address (if different than mailing address) 11 Augusta Dr. Danbury, Connecticut 06813					
6. Transporter 1 Company Name NEW ENGLAND DISPOSAL TECHNOLOGIES				U.S. EPA ID Number MAR000504860				
7. Transporter 2 Company Name				U.S. EPA ID Number				
8. Designated Facility Name and Site Address STABLEX CANADA INC. 760, boul. industriel Blainville, Quebec J7C 3V4 Facility's Phone: (450) 430-9230			U.S. EPA ID Number TR: 68007897 NYD980756415					
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit W/Vol.	13. Waste Codes	
	X	1. RQ Waste environmentally hazardous substances, solid, n.o.s. (nickel) 9 UN3077 III	No.	Type	est 40,000	P	F008	
		2.						
		3.						
		4.						
14. Special Handling Instructions and Additional Information Waste acting as an intermediary arranging for export.								
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.								
Generator's/Offor's Printed/Typed Name Russell Richter			Signature <i>Russell Richter</i>			Month Day Year 09 27 06		
16. International Shipments		<input type="checkbox"/> Import to U.S.		<input checked="" type="checkbox"/> Export from U.S.		Port of entry/exit: Date leaving U.S.:		
17. Transporter Acknowledgment of Receipt of Materials		Transporter 1 Printed/Typed Name Peter Lavallee		Signature <i>Peter Lavallee</i>		Month Day Year 09 27 06		
18. Discrepancy		18a. Discrepancy Indication Space		Manifest Reference Number:		U.S. EPA ID Number		
		<input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection						
18b. Alternate Facility (or Generator)		Facility's Phone:		18c. Signature of Alternate Facility (or Generator)		Month Day Year		
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)								
1. (12) or T23, D99 (M Cells) and/or T24 and/or T25 or T27 or T29, D99 (M Cells) All waste treated			2.		3.		4.	
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a								
Printed/Typed Name FRANCO TREPODIER			Signature <i>Franco Trepodier</i>			Month Day Year 09 27 06		

88314

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator ID Number CT0064834914	2. Page 1 of 1	3. Emergency Response Phone (450) 430-8230 ext. 275	4. Manifest Tracking Number 000304294 JJK
----------------------------------	---	--------------------------	---	---

5. Generator's Name and Mailing Address GAR ELECTROFORMING DIV P.O. Box 340 Danbury, Connecticut 06813	Generator's Site Address (if different than mailing address) 11 Augusta Dr. Danbury, Connecticut 06813
--	--

6. Transporter 1 Company Name NEW ENGLAND DISPOSAL TECHNOLOGIES	(508) 756-1330	U.S. EPA ID Number MAR000504860
---	----------------	---

7. Transporter 2 Company Name	U.S. EPA ID Number
-------------------------------	--------------------

8. Designated Facility Name and Site Address STALEX CANADA INC. 750, Blvd. Industriel Bainville, Quebec J7C 3V4	Facility's Phone: (450) 430-8230	TR: 00007807	U.S. EPA ID Number NYDS80758415
---	---	---------------------	---

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes	
		No.	Type				
X	1. RC Waste environmentally hazardous substances, solid. n.o.s. (nickel) 9 UN3077 III	001	CM	EST 40000	P	F006	
	2.						
	3.						
	4.						

14. Special Handling Instructions and Additional Information
Marsulex acting as an intermediary arranging for export 7 26 08 6:00 AM
JWILLIAMS

15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name Russell R. Korte	Signature <i>Russell R. Korte</i>	Month 09	Day 27	Year 06
---	--------------------------------------	--------------------	------------------	-------------------

16. International Shipments <input type="checkbox"/> Import to U.S.	<input checked="" type="checkbox"/> Export from U.S.	Port of entry/exit: CHAMPLAIN NY
Transporter signature (for exports only): <i>[Signature]</i>	Date leaving U.S.: 9-28-06	

17. Transporter Acknowledgment of Receipt of Materials	Signature <i>[Signature]</i>	Month 09	Day 27	Year 06
Transporter 1 Printed/Typed Name JONATHAN D. FEET	Signature <i>[Signature]</i>	Month 09	Day 27	Year 06
Transporter 2 Printed/Typed Name	Signature	Month	Day	Year

18. Discrepancy

18a. Discrepancy Indication Space Quantity Type Residue Partial Rejection Full Rejection

4540506 Manifest Reference Number:

18b. Alternate Facility (or Generator)	U.S. EPA ID Number
Facility's Phone:	

18c. Signature of Alternate Facility (or Generator)	Month 09	Day 27	Year 06
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19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1. T	2.	3.	4.
-------------	----	----	----

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in item 18a	Signature <i>[Signature]</i>	Month 09	Day 27	Year 06
Printed/Typed Name FRANK TREPOUX				

ATTACHMENT C

Site Photos

SITE PHOTOS



Excavation in Progress



Excavation in Progress

SITE PHOTOS



Post Excavation Pit Beginning to Fill with Groundwater



Post Excavation Sample Locations

SITE PHOTOS



Post Excavation Sampling Locations 26 and 31



Post Excavation Sampling Locations 21 and 45

SITE PHOTOS



Adjacent Closed RCRA Unit

ATTACHMENT D

Miscellaneous Notices and Approvals



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
New England Region
1 Congress Street, Suite 1100
Boston, Massachusetts 02114-2023

December 19, 2005

George Ray, President
GAR Electroforming, Inc.
P.O. Box 340
11 Augusta Drive
Danbury, Connecticut 06810-0340

Re: APPROVAL of Pumice Lagoon Interim Corrective Measure Work Plan

Dear Mr. Ray,

The United States Environmental Protection Agency (EPA) is in receipt of a December 2005 work plan from your consultant, SE Technologies, setting forth an Interim Corrective Measure Plan for the Pumice Lagoon (Work Plan).

We concur that this work is most appropriately conducted during the third Quarter of 2006 given the efficiencies that could likely result by conducting this work during the dry season.

The Work Plan is hereby APPROVED.

Please contact me if you have any questions or concerns with this approval.

Sincerely,

A handwritten signature in black ink, appearing to read "Raphael J. Cody".

Raphael J. Cody
Corrective Action Section
U.S. EPA
Suite 1100-HBT
One Congress Street
Boston, MA 02114-2023

cc: Marina Roser, CTDEP
Roger Dhonau, SE Technologies

THE NEWS-TIMES, FRIDAY, JULY 21, 2006

LEGAL NOTICE

GAR Electroforming

Notice is hereby given that GAR Electroforming Division with operations at 11 Augusta Drive in Danbury intends to implement an Interim Corrective Measures Plan as approved by CTDEP and EPA. The corrective measures will involve removal and off-site disposal of an estimated 60-80 cubic yards of nickel impacted pumice from an industrial waste lagoon at the rear of the GAR property. The lagoon has been inactive for more than 20 years. It was recently determined that pumice in this lagoon contains concentrations of nickel that could present an excessive risk to human health and/or the environment if left unaddressed. Nickel has been detected in the pumice at concentrations up to 6700 mg/kg.

Interested parties can obtain information on the planned Interim Corrective Measures Plan as well as a copy of the plan from Raphael J. Cody, U.S. EPA - Region 1, Corrective Action Section, Office of Site Remediation and Restoration, Suite 1100 - MBT, One Congress Street, Boston, MA 02114-2023 between the hours of 8:30 AM and 4:30 PM Monday through Friday at 617-918-1366. Public comments may also be submitted to the above address for a period of 45 days after the publication of this notice.

City of Danbury
Health & Housing Department
155 Deer Hill Ave, Danbury, CT 06810
Phone 797 4625 Fax 796 1596

HAND DELIVER

Date: 8/23/06

GAR Electroforming Division, Electroformers, Inc.
11 Augusta Drive Mr. George Ray
Danbury, CT 06810

RE: EIC #714, GAR Electroforming Division, 11 Augusta Drive
K12180, IG-80 Zone, ICM Plan under Joint Jurisdiction of CTDEP
Mr. George Ray: & EPA Region I.

You have submitted an application for a permit to conduct regulated activity under the City Of Danbury Inland Wetland and Watercourses Regulations. Having delegated authority (section 10.1a) that require the City of Danbury to grant permit extensions and approve summary rulings (section 7.6) the Department has reviewed and approves your application having found that the proposed activity will cause no greater than minimal impact upon wetlands or watercourses if carried out as proposed.

The regulation stipulates that our ruling may be limited or revoked by the EIC Commission if it is later shown that a regulated activity or non-permitted use is a consequence of the proposed activity. This new permit is valid for five years from the date of approval. This permit expires upon completion of all regulated activities.

This permit is not assignable or transferable without the written permission of the Commission.

If you require further information, please contact me..

Sincerely,



Daniel Baroody MPH, RS
Senior Environmental Inspector
Environmental Health Section

COPY

July 10, 2006

Wetlands Management Section
Inland Water Resources Division
Department of Environmental Protection
79 Elm Street
Hartford, CT 06106



SE Technologies, Inc.
98 Vanadium Road
Building D., Second Floor
Bridgeville, PA 15017
412.221.1100
FAX 412.257.6103
<http://www.vanadium.com>

**Re: Statewide Inland Wetland & Watercourse
Activity Reporting Form**

Gentlemen:

Enclosed please find the following:

Drawings Reports Other

Copies	Description
1	Completed form as referenced above for GAR Electroforming Division of Electroformers, Inc., of Danbury, Connecticut

These are transmitted as checked below:

Approved Not Approved For Review and Comment
 For Your Use For Approval As Requested

If you have any questions, please call me at 412-221-1100, extension 1628.

Sincerely,

SE Technologies, Inc.

Roger A. Dhonau, PE, QEP
Chief Environmental Engineer

Enclosure

cc: Mr. George Ray – GAR Electroforming Division, Electroformers, Inc.



CONNECTICUT DEPARTMENT OF ENVIRONMENTAL PROTECTION
 IWRD - 79 Elm Street
 Hartford, CT 06106-5127

GIS CODE #: _____
 For DEP Use Only

Arthur J. Rocque, Jr., Commissioner

Statewide Inland Wetlands & Watercourses Activity Reporting Form

Please complete this form in accordance with the instructions. Please print or type.

PART I: To Be Completed By The Inland Wetlands Agency Only

1. DATE ACTION WAS TAKEN: Year _____ Month _____

ENVIRONMENTAL IMPACT COMMISSION

2. ACTION TAKEN: _____

City Hall

155 Deer Hill Avenue

Danbury, Connecticut 06810

3. WAS A PUBLIC HEARING HELD? Yes _____ No _____

4. NAME OF AGENCY OFFICIAL VERIFYING AND COMPLETING THIS FORM:

(print) _____ (signature) _____

PART II: To Be Completed By The Inland Wetlands Agency Or The Applicant

5. TOWN IN WHICH THE ACTION IS OCCURRING: Danbury

Does this project cross municipal boundaries? Yes _____ No X

If Yes, list the other town(s) in which the action is occurring: _____

6. LOCATION: USGS Quad Map Name: Danbury AND Quad Number: 076

Subregional Drainage Basin Number: 6600

7. NAME OF APPLICANT, VIOLATOR OR PETITIONER: GAR Electroforming Division

Electroformers, Inc.

8. NAME & ADDRESS/LOCATION OF PROJECT SITE: 11 Augusta Drive Danbury, CT 06813

Briefly describe the action/project/activity: Corrective Action Program Interim Corrective Measure (Lagoon Clean-out)

9. ACTIVITY PURPOSE CODE: P

10. ACTIVITY TYPE CODE(S): 2, 12, _____

11. WETLAND / WATERCOURSE AREA ALTERED [must be provided in acres or linear feet as indicated]:

Wetlands: 0 acres Open Water Body: 0 acres Stream: 0 linear feet

12. UPLAND AREA ALTERED [must be provided in acres as indicated]: 0.04 acres

13. AREA OF WETLANDS AND / OR WATERCOURSES RESTORED, ENHANCED OR CREATED: 0 acres
 [must be provided in acres as indicated]

DATE RECEIVED:

PART III: To Be Completed By The DEP

DATE RETURNED TO DEP:

FORM COMPLETED: YES NO

FORM CORRECTED / COMPLETED: YES NO

ATTACHMENT E

Elevation Data

Site Ground Surface/Groundwater Elevation Analysis

Recent Elevation Survey Data in Adjacent Wetland
(Measurements one foot below Topic of Casing in Well MW7)

Distance From Well 7:	125 ft.	200 ft.
Line 1	3.45	2.37
Line 2	3.80	3.31
Line 3	3.43	2.14

Depth to Groundwater in Well 7:

10/26/05	3.80 ft.
5/17/05	5.10 ft.
10/26/04	5.00 ft.
5/5/04	4.58 ft.
10/20/03	5.08 ft.
4/30/03	4.91 ft.
10/29/02	5.41 ft.
4/30/02	4.92 ft.