



March 10, 2011

U.S.EPA Region II  
Emergency & Remedial Response Division  
290 Broadway, 19<sup>th</sup> Floor  
New York, NY 10007-1866  
Attn: Ms. Anne Kelly

RE: Former Central Foundry – Massena Superfund Site, Massena, New York  
EPA Orders Index No. II CERCLA-20207 and 20215 -  
Monthly Progress Report No. 226 for February 2011

Dear Ms. Kelly:

On behalf of Motors Liquidation Company (MLC), BOW Environmental Solutions, Inc., enclosed please find 2 copies of the Monthly Progress Report relating to the activities performed during the month of February 2011, in conformance with the Unilateral Administrative Orders for both operable units of the Former Central Foundry, Massena Superfund Site.

Should you or your staff have any questions regarding the contents of the Progress Report, please contact me at (937) 478-8221.

Sincerely,

A handwritten signature in cursive script that reads "Pamela L. Barnett".

Pamela L. Barnett, PG

Project Manager

BOW Environmental Solutions, Inc. on behalf of MLC

**Monthly Progress Report No. 226 – February 2011**  
**Former Central Foundry Massena Superfund Site - Operable Units 1 & 2**  
**USEPA Unilateral Administrative Orders Nos. II CERCLA - 20207 & 20215**

**I. Compliance Activities Completed for the Period (February 1 through February 28, 2011)**

**Remedial Design / Remedial Action**

The installation and development of aquifer test wells and associated monitoring wells was completed on February 2, 2011. Development water and soil cuttings were managed on site. ARCADIS prepared draft well completion logs. At the request of USEPA, no further work on the aquifer tests will be conducted until after April 30, 2011. All other work tasks associated with RD/RA engineering for OU1 and OU2 were suspended through the end of February pending budget review by USEPA.

**Meetings**

No meetings regarding OU1 and OU2 were held in February.

**Maintenance Activities**

Routine operations and maintenance of the wastewater treatment plant, as well as inspection of groundwater control systems, were conducted in February. PCBs were detected in the effluent from Outfall 004, which prompted an immediate measure by MLC as summarized below.

On January 6, 2011, MLC collected monthly grab samples from Outfalls 002 (at the Raquette River) and 004 (north of the Industrial Landfill) as required by SPDES Permit #NY0000540. The samples were analyzed by TestAmerica of Buffalo, New York. These are permitted outfalls for the discharge of untreated stormwater. On January 28, 2011 MLC notified NYSDEC that they had received the laboratory results on January 27, 2011, from Test America indicating a total polychlorinated biphenyl (PCB) concentration of 1.7 micrograms per liter (ug/L) in the discharge sample from Outfall 004 which is above the permit daily maximum of 0.3 ug/L. In addition, a total PCB concentration of 0.12 ug/L was reported at Outfall 002, which is below the daily maximum of 0.3 ug/L but above the detection limit of 0.057ug/L. Written notification of this information was provided to NYSDEC on February 1, 2011. A second sample was collected from Outfall 004 on February 10, 2011. PCBs were reported at a concentration of 14 ug/L. NYSDEC was notified within 24 hours of receiving the laboratory report. Written notification was provided to NYSDEC on February 21, 2011. On February 25, 2011, Outfall 002 was sampled. The analytical results from Outfall 002 were received on March 8, 2011, reporting a PCB concentration of 0.11 ug/L, which is below the permit daily maximum of 0.3 ug/L but above the minimum detection limit of 0.061 ug/L.

On February 28, 2011, MLC notified NYSDEC regarding MLC's plan for implementing interim corrective measures in response to detections of PCBs in excess of the SPDES permit limit at Outfall 004 on January 6 and February 10, 2011. USEPA was provided with a copy of the MLC plan and approved the application of remedial funds to proceed with this work. A copy of this plan is included as Attachment 1.

Also during the month of February, a total of approximately 86,210 gallons of water (approximately 71,680 gallons from the sump northeast of the Industrial Landfill and 14,530 gallons from the Process Water lagoon underdrain) were transferred to the site's Waste Water Treatment Plant (WWTP) for treatment.

**Monthly Progress Report No. 226 – February 2011**  
**Former Central Foundry Massena Superfund Site - Operable Units 1 & 2**  
**USEPA Unilateral Administrative Orders Nos. II CERCLA - 20207 & 20215**

**II. Analytical Data**

Results from the investigation of the drainage swales associated with Outfall 004 are provided in Attachment 1.

Additional analytical results received during the month of February for the Massena Superfund Site are summarized in tables provided in Attachment 2, including the following:

- Table 1 – Summary of Outfall 002 Water Sampling Analytical Results.
- Table 2 – Summary of Outfall 004 Water Sampling Analytical Results.

**III. Project Tasks Scheduled for the Coming Month (March 2011)**

During March, MLC will collect quarterly samples from the sump northeast of the Industrial Landfill and the groundwater sump at Process Water Lagoon #2. MLC will also evaluate the results of the initial phase of work associated with the *Pre-Design Investigation for Operable Units 1 and 2* and prepare for mobilizing to the site to complete this work in April.

**IV. Project Status, Delays and Recovery Plans**

The following table summarizes submittals made during the month, submittals responded to during the month, and submittals which continue to be under review.

<b><u>Submitted to EPA / NYSDEC</u></b>	<b>Date</b>
Notification to NYSDEC of January 6, 2011 PCB exceedances at Outfall 004	February 1, 2011
Notification to NYSDEC of February 10, 2011 PCB exceedances at Outfall 004	February 21, 2011
Request to NYSDEC for Wastewater Treatment System Modifications	February 24, 2011
Notification to NYSDEC of Outfall 004 Interim Corrective Measures Plan	February 28, 2011
<b><u>Previously Submitted to EPA / NYSDEC – Pending Comment or Approval</u></b>	
Draft Remedial Action Waste Management Plan	January 7, 2010
Draft Preliminary Remedial Design / Remedial Action Work Plan Combined East Disposal Area and Industrial Landfill	February 8, 2010
Draft Preliminary Remedial Design/Remedial Action Work Plan for the North Disposal Area and Active/Inactive Lagoons for the Central Foundry Site, Massena, NY	March 8, 2010
Draft Preliminary Remedial Design/Remedial Action Work Plan Groundwater Collection and Treatment System	March 8, 2010
Draft Preliminary Remedial Design/Remedial Action Work Plan for the Combined EDA and Industrial Landfill for the Central Foundry Site	April 7, 2010
<b><u>Comments/Approvals Received from EPA/NYSDEC during the current Reporting Month</u></b>	
None	-

**Monthly Progress Report No. 226 – February 2011  
Former Central Foundry Massena Superfund Site - Operable Units 1 & 2  
USEPA Unilateral Administrative Orders Nos. II CERCLA - 20207 & 20215**

**ATTACHMENT 1**

**Notification Letter to NYSDEC of Outfall 004 Interim Corrective Measures Plan**

**February 28, 2011**



February 28, 2011

NYSDEC Region 6  
Rebecca Storrings  
317 Washington St.  
Watertown, NY 13601

RE: SPDES Permit #NY0000540 Outfall 004 Interim Corrective Measures Plan

Dear Rebecca:

This letter is being sent to provide the Department with notification of interim corrective measures underway at the Massena site by Motors Liquidation Company (MLC) in response to detections of PCBs in excess of the SPDES permit limit at Outfall 004 on January 6 and February 10, 2011.

Upon learning that PCBs were detected in the Outfall 004 discharge, we notified the Department and subsequently conducted a field reconnaissance along the east and west segments of the ILF drainage swale, upstream of the outfall. ARCADIS staff inspected the swales for evidence of base flow under the snow and ice, visually identified areas exhibiting base flow, documented the presence and general extent of iron oxide flocculation, and obtained field measurements of pH, conductivity and temperature. On February 16, 2011, ARCADIS collected samples of the base flow for PCB and iron analysis from one location along the east swale and two locations along the west swale, including a west swale area (sample labeled Swale 3) exhibiting significant orange flocculent and relatively elevated conductivity (attached Figure 1).

The analytical results from the swale water samples, received February 22, 2011, are as follows:

Sample ID	Location	PCBs (ug/L)	Iron (mg/L)	Comments
Swale 1	40 feet east of Outfall 004 inlet	Non-detect	0.41	Clear water
Swale 2	245 feet west of Outfall 004 inlet	Non-detect	3.9	trace orange solids
Swale 3	100 feet west of Outfall 004 inlet	9.2	42.1	orange solids present

The field observations and supporting analytical results from the base flow sampling indicate that the discharge of trace level PCBs at Outfall 004 in January and February was associated with groundwater outbreaks entering the west swale. We believe that this outbreak cannot be effectively evaluated and eliminated while the ground and clay cap remains frozen and under snow cover. However, we have initiated interim measures intended to mitigate the transport of PCBs from the west swale to the outfall while we work on a long term permanent solution.

Our interim corrective measures plan is as follows:

First, MLC immediately installed silt fencing and hay bales at the outlet from the swale to the discharge culvert.

Second, MLC plans to implement a series of protective measures, designed and constructed in the field. These measures and their timing are as follows:

Week of February 28, 2011 (weather permitting – no large rain or snow melt event)

- West Swale Rip/Rap Removal - Remove existing rip/rap in the west swale from the inlet to Outfall 004 to a point 245 feet upgradient of the inlet. Removed rip/rap will be staged to the Site Decon area for future handling.
- Clean West Swale - Flush west swale and capture flush water and transfer to on-site Frac tank.
- Clean Outfall 004 Culvert - Flush Outfall 004 culvert and capture flush water and transfer to on-site Frac tank.
- Install In-situ Carbon Treatment in the west swale - Install two permeable check dams constructed of activated carbon wrapped in non-woven geotextile to filter base flow (underground storm water flow) coming from the west swale. Silt fencing to be placed immediately upgradient and down gradient of check dams to protect check dams and area downgradient of the check dams from fines. Check dams to be located approximately 5 feet and 50 feet upgradient of Outfall 004 inlet, as shown on attached Figure 1.

Week of March 21, 2011 (weather permitting)

- Provide Filtration of Subsurface Water Entering from Under Swale - Line west swale with Organoclay Reactive Core Mat. Anchor the Organoclay Reactive Core Mat with hay bales and/or landscape pins. This will be performed approximately two weeks after in-situ carbon treatment is installed and the west swale is cleaned to allow MLC time to evaluate where potential seeps are emerging.


Ongoing through post-installation period

- Evaluate Need for Additional Corrective Measures - Upon snow melt and subsurface soil thawing, perform visual investigation to further delineate the potential location of non-surface water infiltration.
- Weekly Inspections - Conduct weekly documented inspections of interim measure (March 1, 2011 through May 1, 2011).
- SPDES Monitoring - Collect storm water samples from Outfall 004 during next storm event.

We will report our findings to the Department as we monitor the installed controls and effluent quality.

If you have any questions, please contact me at 937.478.8221.

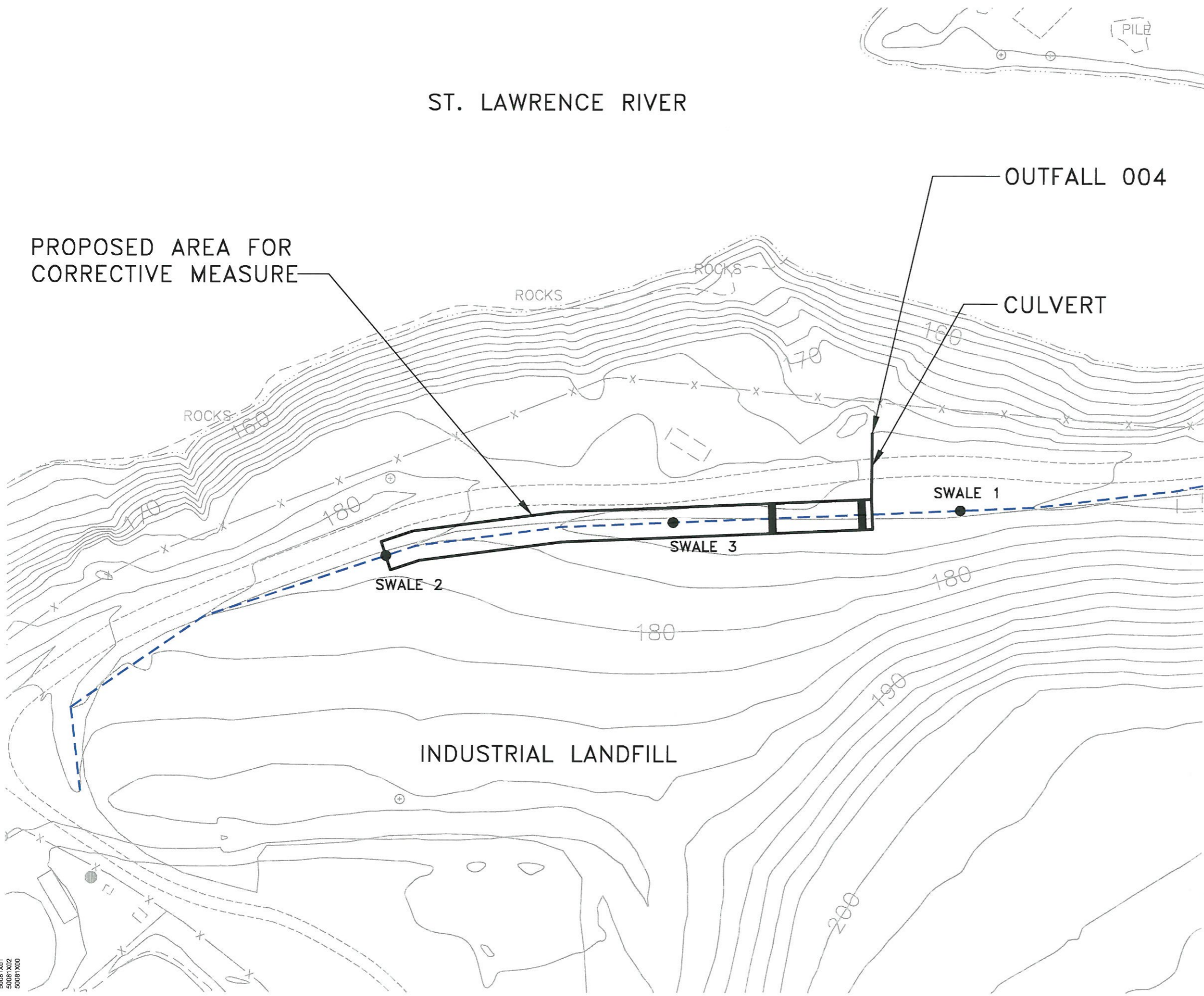
Sincerely,



Pamela L. Barnett, PG  
Project Manager  
BOW Environmental Solutions, Inc. on behalf of MLC  
0901111950.doc

cc: R. Kapp, ARCADIS  
D. Sauda, ARCADIS  
L. Cullen, ARCADIS

CITY: SYRACUSE DIV/GROUP: ENV/CD DB: N. SMITH/GALL B. DeCLERCQ L. FORAKER LD: PIC: MCBURNEY PM: R. BOELTER TM: L. CULLEN LYR: ONM OFF=REF  
 G:\ENV\CD\SURFACE\ACT\100801\100801\100801\100801\CORRECTIVE MEASURE\50081\G01.DWG LAYOUT: 1 SAVED: 2/25/2011 9:42 AM ACADVER: 18.05 (LMS TECH) PAGES/SETUP: C-LB-PDF PLOT/STYLE/TABLE: PLTFULL.CTB PLOTTED: 2/25/2011 9:42 AM BY: FORAKER, LYDIA  
 XREFS: 50081\X01 50081\X02 50081\X00



ST. LAWRENCE RIVER

PROPOSED AREA FOR CORRECTIVE MEASURE

OUTFALL 004

CULVERT

SWALE 1

SWALE 3

SWALE 2

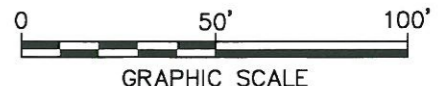
INDUSTRIAL LANDFILL

LEGEND:

- SAMPLING POINT
- ▬ PROPOSED CHECK DAM (APPROXIMATE LOCATION)
- SWALE
- 170— GROUND SURFACE ELEVATION CONTOUR
- x- FENCE
- PAVED ROAD
- - - UNPAVED ROAD

NOTES:

1. BASEMAP INFORMATION, PHOTOGRAMMETRICALLY DERIVED FROM 1997 AERIAL PHOTOGRAPHY, WAS OBTAINED FROM CAMP DRESSER & MCKEE.
2. CONTOUR INTERVAL EQUALS 2 FEET.
3. HORIZONTAL DATUM BASED ON NEW YORK STATE PLANE COORDINATE SYSTEM, EAST ZONE, NORTH AMERICAN DATUM OF 1983 (NAD 83). VERTICAL DATUM BASED ON NORTH AMERICAN VERTICAL DATUM OF 1988.
4. ALL LOCATIONS ARE APPROXIMATE.



**DRAFT**

CENTRAL FOUNDRY SUPERFUND SITE MASSENA, NEW YORK	
<b>OUTFALL 004 SWALE CORRECTIVE MEASURE</b>	
	FIGURE <b>1</b>

**ATTACHMENT 2**

**Analytical Data**

**Table 1**  
**Summary of Outfall 002 Water Sampling Analytical Results**  
**Former Central Foundry Massena Superfund Site, New York**

PCBs EPA 608 - Hexane Extractable EPA 413.1 - Total Suspended Solids EPA 160.2 - Metals EPA 200.7

#	Sample ID	Date Sampled	Polychlorinated Biphenyls (PCBs) EPA 608			Hexane Extractable (Oil & Grease) EPA 1664A			Total Suspended Solids (TSS) EPA 160.2				Metals USEPA 200.7				
			Detection Limit (ug/l)	Analytical Results (ug/l)	SPDES Permit Limits (ug/l)	Detection Limit (mg/l)	Analytical Results (mg/l)	SPDES Permit Limits (mg/l)	Detection Limit (mg/l)	Analytical Results (mg/l)	SPDES Permit Limits (mg/l)	Aluminum (mg/l)	SPDES Permit Limits (mg/l)	Iron (mg/l)	SPDES Permit Limits (mg/l)		
1	-	No sample collected during January due to frozen conditions.															
2	13347	12-Feb-09	0.0532	U	0.3	1.0	6.30	15	1.00	4.30	50	1.12	see note 1, below	1.16	see note 1, below		
3	13382	12-Mar-09	0.0515	U	0.3	1.00	<1.00	15	1.00	<1.00	50	0.0646	see note 1, below	0.130	see note 1, below		
4	13406	2-Apr-09	0.0515	U	0.3	1.00	<1.00	15	1.00	<1.00	50	<0.0500	see note 1, below	0.217	see note 1, below		
5	13433	21-May-09	0.0510	U	0.3	1.00	<1.00	15	1.00	<1.00	50	<0.0500	see note 1, below	0.0848	see note 1, below		
6	-	No stormwater runoff at Outfall when checked.															
7	13529	6-Aug-09	0.0515	U	0.3	1.00	<1.00	15	1.00	2.00	50	0.0748	see note 1, below	0.2340	see note 1, below		
8	13564	15-Sep-09	0.0521	U	0.3	1.00	<1.00	15	1.00	<1.00	50	<0.0500	see note 1, below	0.0885	see note 1, below		
9	13598	8-Oct-09	0.0520	U	0.3	1.00	2.30	15	1.00	<1.00	50	<0.0500	see note 1, below	0.1430	see note 1, below		
10	13632	3-Nov-09	0.0515	U	0.3	1.00	7.70	15	1.00	<1.00	50	<0.0500	see note 1, below	0.1880	see note 1, below		
11	13667	3-Dec-09	0.0515	U	0.3	1.00	<1.00	15	1.00	3.60	50	0.3550	see note 1, below	0.3790	see note 1, below		
12	13700	7-Jan-10	0.0500	U	0.3	1.00	<1.00	15	1.00	<1.00	50	<0.0500	see note 1, below	0.1640	see note 1, below		
13	13730	2-Feb-10	0.0500	U	0.3	1.00	<1.00	15	1.00	<1.00	50	<0.0500	see note 1, below	0.0745	see note 1, below		
14	13765	1-Mar-10	0.0526	U	0.3	1.00	<1.00	15	1.00	<1.00	50	<0.0500	see note 1, below	<0.0500	see note 1, below		
15	13795	8-Apr-10	0.0532	U	0.3	1.0	<1.00	15	1.00	1.00	50	<0.0500	see note 1, below	0.188	see note 1, below		
16	13828	6-May-10	0.0526	U	0.3	1.0	<1.00	15	1.00	<1.00	50	<0.0500	see note 1, below	0.188	see note 1, below		
17	13859	3-Jun-10	0.0500	U	0.3	1.0	2.30	15	1.00	4.50	50	<0.0500	see note 1, below	<0.0500	see note 1, below		
18	13900	1-Jul-10	0.0505	U	0.3	1.0	2.10	15	1.00	<1.00	50	<0.0500	see note 1, below	0.420	see note 1, below		
19	13931	5-Aug-10	0.0500	U	0.3	1.0	<1.00	15	1.00	1.10	50	0.0612	see note 1, below	0.149	see note 1, below		
20	13963	30-Sep-10	0.0500	U	0.3	1.0	<1.00	15	1.00	3.00	50	<0.0500	see note 1, below	0.235	see note 1, below		
21	14000	1-Oct-10	0.0500	U	0.3	1.0	2.30	15	1.00	1.70	50	0.2030	see note 1, below	0.286	see note 1, below		
22	14031	4-Nov-10	0.0500	U	0.3	1.0	<1.00	15	1.00	<1.00	50	<0.0500	see note 1, below	0.350	see note 1, below		
23	14060	2-Dec-10	0.0510	U	0.3	1.0	<1.00	15	1.00	<1.00	50	<0.0500	see note 1, below	0.1050	see note 1, below		
24	480-651-1	6-Jan-11	0.057	0.12	0.3	4.9	ND	15	4.0	ND	50	ND	see note 1, below	0.28	see note 1, below		
25	480-1811-1	17-Feb-11	0.061	0.01	0.3	5.0	ND	15	4.0	ND	50	ND	see note 1, below	0.18	see note 1, below		

Notes:

- 1). ND means Non-detection. There is no effluent limit on metals for the SPDES Permit.
- 2). Analyses performed by TestAmerica, Buffalo, NY

**Table 2**  
**Summary of Outfall 004 Water Sampling Analytical Results**  
**Former Central Foundry Massena Superfund Site, New York**

PCBs EPA 608 - Hexane Extractable EPA 1664A - Total Suspended Solids EPA 160.2 - Metals EPA 200.7

#	Sample ID	Date Sampled	Polychlorinated Biphenyls (PCBs) EPA 608				Oil & Grease (Hexane Extractable) EPA 1664A			Total Suspended Solids (TSS) EPA 160.2				Metals USEPA 200.7		
			Detection Limit (ug/l)	Analytical Results (ug/l)	SPDES Permit Limits (ug/l)	Detection Limit (mg/l)	Analytical Results (mg/l)	SPDES Permit Limits (mg/l)	Detection Limit (mg/l)	Analytical Results (mg/l)	SPDES Permit Limits (mg/l)	Aluminum (mg/l)	SPDES Permit Limits (mg/l)	Iron (mg/l)	SPDES Permit Limits (mg/l)	
1	13348	02-Feb-09	0.0500	U	0.3	1.0	2.30	15	1.00	1.60	50	0.130	see note 1. below	0.152	see note 1. below	
2	13383	11-Mar-09	0.0500	U	0.3	1.0	<1.00	15	1.00	4.40	50	0.129	see note 1. below	0.177	see note 1. below	
3	13407	02-Apr-09	0.0510	U	0.3	1.0	<1.00	15	1.00	<1.00	50	<0.0500	see note 1. below	0.311	see note 1. below	
4	13434	21-May-09	0.0521	U	0.3	1.0	<1.00	15	1.00	5.70	50	<0.0500	see note 1. below	2.75	see note 1. below	
5	13469	30-Jun-09	0.0515	U	0.3	1.0	<1.00	15	1.00	28.50	50	<0.0500	see note 1. below	10.80	see note 1. below	
6	13530	06-Aug-09	0.0510	U	0.3	1.0	<1.00	15	1.00	12.60	50	<0.0500	see note 1. below	4.74	see note 1. below	
7	13565	15-Sep-09	0.0521	U	0.3	1.0	2.30	15	1.00	4.40	50	<0.0500	see note 1. below	7.59	see note 1. below	
8	13599	13-Oct-09	0.0510	U	0.3	1.0	<1.00	15	1.00	7.80	50	<0.0500	see note 1. below	3.44	see note 1. below	
9	13633	03-Nov-09	0.0515	U	0.3	1.0	<1.00	15	1.00	1.10	50	<0.0500	see note 1. below	0.489	see note 1. below	
10	13668	03-Dec-09	0.0521	U	0.3	1.0	<1.00	15	1.00	4.00	50	0.8130	see note 1. below	0.868	see note 1. below	
11	13701	07-Jan-10	0.0500	U	0.3	1.0	<1.00	15	1.00	2.50	50	<0.0500	see note 1. below	1.00	see note 1. below	
12	13731	02-Feb-10	0.0500	U	0.3	1.0	<1.00	15	1.00	3.30	50	<0.0500	see note 1. below	1.29	see note 1. below	
13	13766	04-Mar-10	0.0526	U	0.3	1.0	<1.00	15	1.00	<1.00	50	<0.0500	see note 1. below	0.162	see note 1. below	
14	13796	08-Apr-10	0.0500	U	0.3	1.0	<1.00	15	1.00	4.00	50	<0.0500	see note 1. below	1.44	see note 1. below	
15	13829	06-May-10	0.0500	U	0.3	1.0	<1.00	15	1.00	3.50	50	<0.0500	see note 1. below	1.00	see note 1. below	
16	13860	03-Jun-10	0.0500	U	0.3	1.0	1.10	15	1.00	5.80	50	0.0641	see note 1. below	1.46	see note 1. below	
17	13901	01-Jul-10	0.0505	U	0.3	1.0	<1.00	15	1.00	7.20	50	<0.0500	see note 1. below	3.650	see note 1. below	
18	13144	01-Jul-08	0.0543	U	0.3	1.0	<1.00	15	1.00	17.80	50	<0.0500	see note 1. below	7.10	see note 1. below	
19	13932	26-Aug-10	0.0500	U	0.3	1.0	<1.00	15	1.00	14.20	50	<0.0500	see note 1. below	5.210	see note 1. below	
20	13964	30-Sep-10	0.0500	U	0.3	1.0	<1.00	15	1.00	6.40	50	<0.0500	see note 1. below	2.430	see note 1. below	
21	14001	1-Oct-10	0.0500	U	0.3	1.0	3.50	15	1.00	1.70	50	0.1520	see note 1. below	0.221	see note 1. below	
22	14032	04-Nov-10	0.0515	U	0.3	1.0	<1.00	15	1.00	2.00	50	<0.0500	see note 1. below	0.075	see note 1. below	
23	480-651-2	6-Jan-11	0.29	1.7	0.3	5.0	ND	15	4.0	ND	50	ND	see note 1. below	1.2	see note 1. below	
24	004 Outfall	10-Feb-11	11.00	14	0.3	4.8	ND	15	4.0	6.0	50	ND	see note 1. below	2.6	see note 1. below	

Notes:

- 1). ND means Non-detection. There is no effluent limit on metals for the SPDES Permit.
- 2). Analyses performed by Analytix Corporation, Inc.

Massena Remediation Program Report Distribution List

---

1 copy (excluding plans or reports):

Chief, New York/Caribbean Superfund Branch  
Office of Regional Counsel  
U.S. Environmental Protection Agency, Region II  
290 Broadway, 20th Floor  
New York, New York 10007-1866  
Attention: GM/Massena Superfund Site Attorney

---

2 copies (or 5 copies if plan or report):

Emergency and Remedial Response Division  
U.S. Environmental Protection Agency, Region II  
290 Broadway, 20th Floor  
New York, New York 10007-1866  
Attention: Anne Kelly

---

2 copies (or 3 if plan or report):

Mr. Ken Jock  
Environmental Director  
St. Regis Mohawk Tribe  
412 State Route 37  
Akwesasne, NY 13655

*for Federal Express Packages:*  
SRMT Environmental Division  
449 Frogtown Road  
Akwesasne, NY 13655

---

3 copies (or 3 copies if plan or report):

New York State Department of Environmental Conservation  
317 Washington Street  
Watertown, New York 13601-3787  
Attention: Regional Hazardous Waste Engineer – Peter Taylor, P.E.  
Peter S. Ouderkirk, P.E. (1 copy)  
Lincoln Fancher, Project Geologist (1 copy)

---

1 copy:

Wendy S. Keuhner, P.E.  
New York State Department of Health  
Flanigan Square, Room 300  
547 River Street  
Troy, New York 12180

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Massena Remediation Program Report Distribution List

All Reports and Government Correspondence:

James M. Redwine, Esq.

Motors Liquidation Company  
401 South Old Woodward Ave, Suite 370  
Birmingham, MI 48009

Scott Haeger

Motors Liquidation Company  
500 Renaissance Dr., Suite 1400  
Detroit, MI 48243  
Phone: (312) 206-9574

Raymond M. Kapp

ARCADIS  
One International Boulevard, Suite 406  
Mahwah, New Jersey 07495  
Phone: 201-684-1410  
Fax: 201-684-1420

Richard G. Boelter

ARCADIS  
c/o MLC (former GM)  
Route 37 East, Box 460  
Massena, NY 13662  
Phone: 315-764-2299

Terry W. Young

ARCADIS  
6723 Towpath Road  
P.O. Box 66  
Syracuse, NY 13214  
Phone: 315-671-9478