



**FMC Corporation  
Middleport, New York**

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**Culvert 105 Study Area (OU5) North of  
Erie Canal Pre-Design Investigation  
Work Plan**

February 2020



## Certification Statement

I, David A. Wright, certify that I am currently a New York State registered professional engineer and that this Culvert 105 Study Area (OU5) North of Erie Canal Pre-Design Investigation Work Plan was prepared in accordance with all applicable statutes and regulations and in substantial conformance with the DER Technical Guidance for Site Investigation and Remediation (DER-10).

David A. Wright, NYS PE # 086954

Date: 02.21.2020

Stamp:



I certify under penalty of law that this document and all attachments were prepared under my direction or supervision according to a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Date: 2/21/2020

Signature: 

Douglas Groux  
Director, EHS Remediation & Governance  
FMC Corporation



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## Acronyms and Abbreviations

Agencies	NYSDEC and USEPA
AOC	Administrative Order on Consent (Docket No. II-RCRA-90-3008(h)-02090)
CLP	Contract Laboratory Program
CMI	Corrective Measures Implementation
CMS	Corrective Measures Study
DER	Division of Remediation
DER-10	DER <i>Program Policy 10 – Technical Guidance for Site Investigation and Remediation</i>
DUSR	data usability summary report
EDD	electronic data deliverable
ELAP	Environmental Laboratory Accreditation Program
EQiS	Environmental Quality Information System
FMC	FMC Corporation
HASP	health and safety plan
ICM	Interim Corrective Measure
mg/kg	milligrams per kilogram
NYSDEC	New York State Department of Environmental Conservation
NYSDOH	New York State Department of Health
Order	Order on Consent and Administrative Settlement (Index No. CO 9-20140625-40), effective June 6, 2019
OSHA	Occupational Safety and Health Administration
OU	Operable Unit
PDI	Pre-Design Investigation
QA/QC	quality assurance/quality control
RCRA	Resource Conservation and Recovery Act
RFI	RCRA Facility Investigation
SB	Statement of Basis
TCLP	Toxicity Characteristic Leaching Procedure
USEPA	U.S. Environmental Protection Agency
VOC	volatile organic compound



# 1. Introduction

## 1.1 Background

FMC Corporation (FMC) owns and operates a pesticide formulating and packaging facility (Facility) located in the Village of Middleport and the Town of Royalton, New York (Figure 1). Investigative, monitoring, and remedial activities have been implemented by FMC to address FMC-related constituents in soil and other environmental media at the Facility and in certain off-site areas. These activities are being conducted in a phased approach, in which separate study areas and/or environmental media have been organized into 11 operable units (OUs). This work is currently subject to the terms and conditions of an Order on Consent and Administrative Settlement (Index No. CO 9-20140625-40) between FMC and the New York State Department of Environmental Conservation (NYSDEC), effective June 6, 2019 (Order), which now guides the process and nature of the work to be addressed in each OU. Prior to June 6, 2019, all work was conducted pursuant to the now-supplanted Administrative Order on Consent (Docket No. II-RCRA-90-3008(h)-02090) among FMC, the United States Environmental Protection Agency (USEPA), and the NYSDEC (the AOC).<sup>1</sup>

Soil and accumulated sediment associated with the Village-owned Culvert 105 municipal stormwater conveyance system and its flood zone are identified as OU5 (Figure 1). The Resource Conservation and Recovery Act (RCRA) Facility Investigation (RFI) and Corrective Measures Study (CMS) process is complete for OU5<sup>2</sup>, and a remedy to be implemented for OU5 was selected in 2013 by the NYSDEC and the USEPA (jointly, the Agencies) in a Final Statement of Basis (SB). The selected remedy involves remediation of soil arsenic concentrations greater than 20 milligrams per kilogram (mg/kg), with flexibility. From 2017 through 2019, NYSDEC and its contractors have been implementing the selected remedy for various OU5 properties located south of the Erie Canal (Figure 1). In accordance with the Order, NYSDEC will continue implementation of the remedy for OU5 in 2020 and FMC will continue the remedial work in OU5, as well as other off-site properties, beginning in 2021.

Section VII.C of the Order stipulates that FMC submit a pre-design investigation (PDI) work plan for the portion of OU5 located north of the Erie Canal within 6 months of the effective date of the Order. The purpose of this *Culvert 105 Study Area (OU5) North of Erie Canal Pre-Design Investigation Work Plan* (PDI Work Plan) is to collect PDI data and information sufficient to support preparation of a Corrective Measures Implementation (CMI) work plan, including a remedial design, for this portion of OU5.

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<sup>1</sup> Pursuant to Section I.C. of the Order, prior approvals, authorizations, and determinations pursuant to the AOC that are applicable to the work discussed in this PDI Work Plan are all still applicable.

<sup>2</sup> See *RCRA Facility Investigation (RFI) Report Volume IV – Culvert 105 and Flood Zone* (RFI Report Volume IV, May 2009) and *Corrective Measures Study Report – Suspected Air Deposition and Culvert 105 Study Areas* (CMS Report, May 2011).



Specifically, the additional data and information to be collected include:

- Topographic survey, including identification of existing ground surface elevations and the locations of buildings, structures, utilities, and other buried and aboveground features to be protected
- Inspection of the condition of Culvert 105 buried pipe sections
- Further delineation of the horizontal and vertical extent of arsenic impacts in soil and sediment to support development of excavation and restoration design drawings, as well as to provide excavation documentation samples

## **1.2 Work Plan Organization**

The remainder of this PDI Work Plan is organized as follows:

- Section 2 - Description of Conditions
- Section 3 - Proposed Investigation Tasks
- Section 4 - Proposed Schedule



## 2. Description of Conditions

A brief summary of the Culvert 105 area is provided in the subsequent sections of this PDI Work Plan. Additional details and descriptions related to Culvert 105 are provided in RFI Report Volume IV (2009, Arcadis).

### 2.1 Culvert 105 System

Culvert 105 is a combination of buried pipe and open ditch sections that together extend approximately 6,600 feet (1.25 miles) in length (Figure 1). Culvert 105 historically originated on the north side of the Facility, but following interim corrective measure (ICM) activities conducted by FMC in 2007, now originates north of the Facility and adjoining railroad tracks. Stormwater flows to the north in Culvert 105, passing through residential properties, under the Erie Canal, and ultimately discharging to Tributary One of Jeddo Creek just north of the Village of Middleport wastewater treatment plant.

The section of Culvert 105 from the Erie Canal to just north of Sleeper Street consists of buried pipes (24-inch to 36-inch diameter sewer pipes of various materials) that were installed to replace open ditch sections over time. For example, three of these sections were installed as part of the 2007 ICM activities.

North of Sleeper Street, Culvert 105 is an open ditch (with the exception of three short lengths of buried pipe) until its confluence with Tributary One. The open ditch sections are approximately 2 feet to 4 feet in width, and on average 2 feet to 4 feet deep compared to the adjacent land. Surface water is intermittently present in the open ditch sections. As discussed in RFI Report Volume IV, some open ditch sections have been periodically excavated to improve flow (i.e., the section next to the Village's wastewater treatment plant).

### 2.2 Properties

For convenience, and consistent with prior submissions to the NYSDEC, OU5 is divided into three reaches north of the Erie Canal (Figure 1): Reach C1 (Erie Canal to Sleeper Street); Reach C2 (Sleeper Street to Property AF1); and Reach C3 (Property AG1 to Tributary One). Properties within each reach are identified below.<sup>3</sup>

	Figure	Properties
Reach C1	2A	13: AA1, AB1 through AB7, and AC1 through AC5
Reach C2	3A	7: AD1 through AD3, AE1 through AE3 and AF1
Reach C3	4A	7: AG1, AH1, AH2, AI1, AJ1, AJ2, and AK1

<sup>3</sup> Includes properties AC5 and AE2, which have not been previously sampled.





Properties AA1, AB5, AB6, AC1, AC2, AC3, and AC4 (seven properties total) were previously issued no further action letters by the Agencies in December 2008, based on the 2007 ICM activities. A portion of properties AD1 and AE1 were issued a no further action letter based on ICM activities conducted in 2011. In addition, the 2013 Final SB indicated that no further action would be required on properties AB3, AB7, AD2, AD3, or AE3 (Figure 1). Notwithstanding, NYSDEC indicated that further evaluation along Culvert 105 buried pipe sections that pass near these properties was needed. Therefore, sampling is proposed herein along buried pipe sections on or adjacent to (i.e., public right-of-way) properties AB3, AB5, AB7, AC1, and AC4.

### **2.3 Constituents of Concern**

Soil and accumulated sediment in OU5 were evaluated for constituents historically manufactured, formulated, handled, and/or used at the Facility, as documented in RFI Report Volume IV. Arsenic was the primary constituent detected above background concentrations, and, therefore, defines the extent of potential impacts. Arsenic analytical data for Reaches C1 through C3 include 1,295 samples collected at 305 locations, with sample depth intervals predominantly within 24 inches below ground surface (bgs). Figures 2A, 3A, and 4A show the prior sampling locations in Reaches C1 through C3, respectively. Arsenic concentrations in soil/sediment at the prior sampling locations are presented on Figures 2B, 3B, and 4B, color-coded by concentration range. These figures present the entire data set for OU5 areas north of the Erie Canal, including samples that were subsequently excavated as part of ICMs (shown as hatched) as well as areas that do not require further action.

### **2.4 Prior Remediation**

FMC completed ICM activities in OU5 areas north of the Erie Canal in 2007 and 2011 under Agencies' approved work plans and the terms and conditions of the then-controlling AOC. The activities included:

- Excavation of impacted soils within and adjacent to open ditch sections of Culvert 105 on eight properties (AA1, AB4, AB5, AB6, AC1, AC2, AC3, and AC4) and an adjoining public right-of-way between the Erie Canal and Sleeper Street (excavated areas shown on Figure 2A)
- Installation of approximately 950 linear feet of new buried pipe to replace the open ditch sections identified above, including installation of associated manholes and drain basins
- Line flushing and removal of accumulated sediment from buried pipe sections of Culvert 105 between sediment chamber MH-N9 at Margaret Droman Park (adjacent to the Erie Canal) and Sleeper Street
- Development and subsequent implementation of a Monitoring and Maintenance Plan for sediment chamber MH-N9 at Margaret Droman Park
- Excavation of soil to depths ranging from 6 inches to 24 inches bgs within a portion of properties AD1 and AE1 to support subsequent development, including installation of culvert pipes where the excavated open ditch alignment crossed a proposed utility corridor



### **3. Proposed Investigation Tasks**

The proposed PDI tasks will include the following:

- Task 1: Community Participation and Property Owner Engagement
- Task 2: Inspection and Survey
- Task 3: Soil Sampling and Analysis
- Task 4: Reporting

#### **3.1 Task 1: Community Participation and Property Owner Engagement**

FMC is committed to involving the Middleport community, property owners, local officials, and other stakeholders potentially affected by the project. The project-specific community participation activities for the OU5 PDI will be conducted in accordance with the *Citizen Participation Plan* for the project (July 2019).

Following NYSDEC acceptance of the PDI Work Plan, the community outreach activities that will be undertaken are as follows:

1. Fact Sheet - Preparation and distribution of a fact sheet regarding the PDI to the OU5 contact list.
2. Document Repositories - Placement of the PDI Work Plan in the document repositories.
3. Property Owner Engagement - FMC will contact each property owner to review the proposed scope of PDI activities for the subject property and to request written access permission to conduct the activities.

#### **3.2 Task 2: Inspection and Survey**

FMC will notify the NYSDEC at least 7 days prior to commencing field work, in accordance with Condition D.4.b. of Module II of Exhibit E to the Order.

Existing information regarding the location and construction of buildings, storm drains, culverts, buried and overhead utilities, and other permanent structures/features will be updated through inquiry of property owners, Dig Safely New York, utility owners, and the Village of Middleport. Video surveillance and geophysical locating methods will be used to locate and inspect the Culvert 105 buried pipe sections that have not been previously remediated to determine condition of the buried pipe and assess the suitability of proposed soil sample locations/depths adjacent to the pipe.

The proposed sampling locations shown on Figure 5 through Figure 7 will be marked in the field by a surveyor. If necessary, some of these locations may be adjusted, with approval of a NYSDEC field representative, to avoid utilities, structures, or other features. The final horizontal coordinates



and vertical elevations of the sampling locations will be recorded by the surveyor upon completion of the sampling activities.

A detailed topographical survey map of the PDI areas will be prepared by a New York State licensed surveyor to identify the above information, along with ancillary features (e.g., sheds, decks, stairways, driveways, fencing, etc.), trees and shrubberies (including approximate size), prior sampling locations, property boundaries, and surface topography. The survey will use a registered National Geodetic Survey benchmark to measure elevation to the nearest 0.1 foot, and at a spacing sufficient to generate 0.5-foot contour intervals. The survey mapping information will subsequently be used to develop the remedial design as part of the CMI phase.

### **3.3 Task 3: Soil Sampling and Analysis**

#### **3.3.1 Sampling Locations**

As described below, the prior sampling locations will be supplemented by additional sampling locations established based on the guidelines of Section 5.4 of NYSDEC's DER Program Policy 10-Technical Guidance for Site Investigation and Remediation (DER-10) and prior work conducted by NYSDEC in or near OU5 sections south of the Erie Canal. Preliminary identification of 334 proposed sampling locations (318 new and 16 prior) is provided on Figures 5 through 7 for Reaches C1 through C3, respectively. Additional sampling locations may need to be collected, with approval of the NYSDEC field representative, based on discussion with property owners or the initial analytical results for the locations proposed herein.

##### **3.3.1.1 Reach C1**

In Reach C1, sampling is needed to address the following remedial design data objectives:

- Evaluate Culvert 105 buried pipe sections that were not previously investigated in the AB-Block and AC-Block.
- Further delineate areas where soil arsenic concentrations exceed 20 mg/kg and were not previously remediated in the AB-Block.
- Provide sufficient sample density such that post-excavation samples are not required (subject to NYSDEC approval).

The rationale for sampling locations proposed in each area of Reach C1 (Figure 5) is described below.

**AC-Block:** No sampling has been previously conducted along buried pipe sections on properties AC4 and AC5, or in the public right-of-way adjacent to properties AC1, AC2, and AC5. Therefore, it has not been confirmed if impacts exist in these areas. To evaluate these areas, the buried pipe sections will be inspected as discussed in Section 3.2, and sampling locations will be established consistent with the approach used by the NYSDEC in OU5 south of the Erie Canal, as follows:



- Sampling transects will be spaced at approximately 100-foot intervals, as measured along the length of the pipe. Transects will consist of two sampling locations on each side of the pipe (four locations total), spaced approximately 5 feet and 10 feet from the centerline of the pipe.
- One additional sample location will be placed on alternating sides of the pipe every approximately 30 feet between transects, at 5 feet from the centerline of the pipe. Where the buried pipe is within a public right-of-way, sampling will be conducted in the vegetated margin, not through the paved road, and, therefore, sequential samples might be on the same side of the pipe.
- The actual sampling locations will be dictated by the location of the pipe as identified in Task 2.
- If warranted based on initial analytical results, additional "step out" locations will be implemented on approximate 5-foot increments, as measured perpendicular to the pipe.

**AB-Block:** No sampling has been previously conducted along buried pipe sections in the public right-of-way adjacent to properties AB1 and AB5. Further, additional delineation of previously identified impacts is needed for buried pipe sections crossing through properties AB1 and AB2, and potentially extending onto properties AB3 and AB7 where the buried pipe sections are proximate to those properties. To evaluate these areas, the same sampling approach identified above for the AC-Block will be applied.

Further, prior sampling results for the AB-Block indicate that impacts are not necessarily limited to the immediate vicinity of Culvert 105. Therefore, in addition to sampling adjacent to the buried pipe sections as described above, a limited number of supplemental sampling locations are also proposed across the properties to achieve an overall density of at least one sampling location per 900 square feet of property area. This density is consistent with the default documentation sampling density identified in DER-10 and the approach applied by NYSDEC at residential properties of similar size located south of the Erie Canal.

**AA-Block:** No further investigation or remediation is needed. Monitoring of accumulated sediment within the Culvert 105 sediment chamber MH-N9 structure is on-going in accordance with the approved monitoring and maintenance plan.

### **3.3.1.2 Reach C2**

In Reach C2, sampling is needed to address the following remedial design data objectives:

- Evaluate Culvert 105 buried pipe sections that were not previously remediated on properties AD1, AE1, and AF1.
- Further delineate areas where soil arsenic concentrations exceed 20 mg/kg and were not previously remediated on properties AD1, AE1, and AF1.
- Provide sufficient sample density such that post-excavation samples are not required (subject to NYSDEC approval).
- Evaluate previously un-sampled Property AE2 (a former orchard) to determine its disposition.



The rationale for sampling locations proposed in each area of Reach C2 (Figure 6) is described below.

**Properties AD1, AE1 and AF1:** These three large properties were previously sampled, with multi-point transects crossing the open ditch on approximate 200-foot intervals, and an approximate 100-foot by 100-foot grid in large open areas, with some overlap of these sampling approaches. In addition, pre-excavation documentation samples were collected from the ICM Area within properties AD1 and AE1, achieving a density of approximately one sampling location per 2,100 square feet within the ICM Area. To further delineate soil arsenic impacts and satisfy documentation sample requirements, the following additional sampling is proposed across properties AD1, AE1, and AF1:

- Along buried pipe sections, apply the same sampling approach identified above for the AC-Block.
- Within open ditch sections, add sampling locations to achieve at least one sampling location per approximately 50 feet of open ditch length.
- Across the properties, double the density of the existing sampling grid to one location for every 50-foot by 50-foot grid area.

This approach will result in an overall sampling location density across each of properties AD1, AE1, and AF1 of approximately one per 2,100 square feet. While this density is less than the default goal identified in DER-10 of one per 900 square feet, DER-10 (Section 5.4(b)(5)(iii)) specifically allows for NYSDEC approval of a lower sampling density for excavations greater than 300 feet in perimeter. In this case, the excavation is anticipated to encompass a much larger area (acres), the existing analytical data indicates that concentrations do not vary greatly over short distances, and the sampling density would be consistent with documentation sampling previously conducted to demonstrate compliance with the remedial goals for the 2011 ICM on these properties. If requested by NYSDEC, additional soil samples could be collected during subsequent CMI phase excavation in these large open areas.

**Property AE2:** No sampling data exists on Property AE2. Two rows of the prior 100-foot sampling grid on adjoining properties AE1 and AF1 will be extended onto the western portion of Property AE2. Based on the initial results obtained, additional sampling may be proposed to further delineate impacts and potentially differentiate between impacts related to the Culvert 105 pathway and historical use of Property AE2 as an orchard.

**Properties AD2, AD3, and AE3:** No sampling is proposed at properties AD2, AD3, or AE3, based on the prior analytical results, no buried pipe sections are located on these properties, and the prior designation of these properties as subject to no further action on Figure 1 of the Final SB.

### **3.3.1.3 Reach C3**

Reach C3 also involves large properties, and prior analytical results identify a corridor of soil arsenic impacts along the open ditch and generally correspond with ground surface topography.



Similar to Reach C2, these areas were also previously sampled with multi-point transects crossing the open ditch on approximate 200-foot intervals, to the extent that access permission was obtained. Only one short culvert pipe is present in Reach C3, and remediation has not been previously conducted in Reach C3. Sampling is needed in Reach C3 to address the following remedial design data objectives:

- Further delineate areas where soil arsenic concentrations exceed 20 mg/kg.
- Provide sufficient sample density such that post-excavation samples are not required (subject to NYSDEC approval).

It is proposed to add multi-point transects to achieve transects on approximate 100-foot intervals crossing the open ditch, thereby resulting in an overall sampling location density, as measured within the area of impact, of approximately one location per 2,100 square feet (Figure 7). The basis for this proposed sampling frequency is the same as presented for Reach C2. As with Reach C2, additional soil samples could be collected during subsequent CMI phase excavation in these large open areas, if requested by NYSDEC.

Additional sampling is not proposed at this time for the final approximately 300 feet of open ditch length prior to confluence with Tributary One, due to the potential for Tributary One flood event interactions. Rather, it is proposed that this area would be addressed with OU6.

### 3.3.2 Soil Sampling Depths

A total of approximately 1,842 soil samples are proposed for collection. Proposed sampling depths are provided in Tables 1 through 3 for Reaches C1 through C3, respectively, and described below.

#### 3.3.2.1 Along Buried Pipe Sections

At each new sampling location proposed along buried pipe sections, samples will be collected from the 0- to 3-inch and 3- to 6-inch depth intervals, and then at 6-inch intervals to 60 inches bgs, as shown below.

0-3	3-6	6-12	12-18	18-24	24-30	30-36	36-42	42-48	48-54	54-60
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The proposed total depth of sampling extends to approximately 2 feet below pipe inverts and is based on existing information on the diameter and invert depth of the buried pipe sections (invert typically 3 feet bgs or less). If pipe inverts are found to be deeper than anticipated during inspection of buried pipe sections (Task 2), sampling depths may be adjusted to accommodate deeper invert elevations.



### 3.3.2.2 Other Areas

At each new sampling location proposed away from buried pipe sections, samples will be collected from the 0- to 3-inch and 3- to 6-inch depth intervals, and then at 6-inch intervals to 24 inches bgs, as shown below.

0-3	3-6	6-12	12-18	18-24
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The total depth of sampling is based on existing analytical data, which indicates that soil impacts in OU5 north of the Erie Canal are generally limited to less than 24 inches bgs. At 16 prior sampling locations, 2 additional samples will be collected in 6-inch increments to extend the depth of sampling data; in some cases, the total depth of sampling will extend deeper than 24 inches. Additional samples may be collected deeper than 24 inches and placed on hold pending receipt of the initial analytical results.

### 3.3.3 Sampling Methods

Samples will be collected manually using pre-cleaned/decontaminated hand tools (i.e., hand auger). Each sample interval will be placed into a decontaminated stainless-steel or disposable paper bowl and will be visually classified and logged by a geologist. Soil will be thoroughly mixed with a clean stainless-steel or disposable spoon to homogenize and will be transferred to a clean, laboratory-provided sample container. Soil borings will be backfilled with excess material removed from the borehole. Void space remaining in any bore hole following the replacement of excess material will be backfilled with commercially available bagged topsoil.

All non-dedicated/disposable sample equipment (e.g., hand auger and stainless steel sample bowls/spoons) will be decontaminated after each use/between borings as follows:

- Wash using a laboratory-grade detergent (e.g., Alconox) solution.
- Rinse with tap water.
- Rinse with deionized water.
- Air dry.

Decontamination water will be transported to the Facility and transferred to a DOT-approved container for characterization and off-site disposal. Consumable/disposable investigation derived waste (IDW) will be disposed of as municipal waste.

### 3.3.4 Quality Assurance/Quality Control

Quality assurance/quality control (QA/QC) procedures will be performed in accordance with the Draft Quality Assurance Project Plan (May 2015) incorporated into the Order and any subsequent updates. Specific field QA/QC activities that apply to the implementation of this sampling plan include:



- Field duplicates will be collected at a rate of approximately 1 per 20 samples.
- Matrix spike/matrix spike duplicate (MS/MSD) samples will be collected at a rate of approximately 1 per 20 samples.
- One rinsate blank will be collected daily when non-dedicated sampling equipment is utilized (e.g., reusable bowls and/or spoons and hand auger).
- All data must be documented on field data sheets or in the field logbooks.
- All instrumentation must be operated in accordance with operating instructions as supplied by the manufacturer unless otherwise specified.
- All laboratory deliverables will be validated by a qualified chemist.

### 3.3.5 Sample Nomenclature

The sample numbering system for the project has been designed to uniquely identify each sample from each sampling program and event while utilizing blind sample identification (ID) numbers for quality control purposes. Each sample container will be labeled with a unique sample number that will facilitate tracking and cross referencing of sample information. This numbering system consists of the sample matrix code, project reference number, sample collection date, sampler's initials, and sequential number beginning with 001 and continuing throughout the sampling program and event. The unique sample number will be recorded with the sample location and depth on project specific field forms at the time of sample collection. The forms will form part of the permanent field record. The sample numbering system to be used is described as follows (labels will be pre-printed with key information, with unique information entered on the sample labels by the field sampler):

Example: MC-11190970-MMDDYY-XX-NNN

Where,

MC (Matrix Code)	Designates type of sample (S for soil/sediment, W for water)
11190970	Project reference number
MMDDYY	Designates date of collection presented as month, day, and year
XX	Sampler initials
NNN	Sequential sample number for event starting at 001 and continuing through end of event

Samples designated for MS/MSD analysis will be identified as such in the remarks column of the laboratory chain of custody form. The boring name and associated property identification associated with the sample number will be included in sample data tables/reports provided to NYSDEC.





### **3.3.6 Sample Analysis**

Sample containers will be placed inside sealed plastic bags as a precaution against cross-contamination caused by leakage or breakage and placed on ice to begin the cooling process. Samples will be transported directly to the selected laboratory by field personnel or picked up by a laboratory courier. If sample shipment by common carrier is required, inert packaging material such as bubble wrap will be added to the cooler to minimize the chance of breakage during transport.

The samples will be submitted to a New York State Department of Health (NYSDOH) Environmental Laboratory Accreditation Program (ELAP)-certified laboratory qualified to perform the required analyses. All samples will be analyzed for total arsenic by USEPA SW-846 Method 6010C or 6020A to meet quantification limits in the event of matrix interference. Results will be reported on a dry weight basis. Additionally, for future waste disposal facility profiling purposes, four samples with the highest reported total arsenic concentrations will also be submitted for toxicity characteristic leaching procedure (TCLP) arsenic by USEPA SW-846 Method 1311.

The laboratory will provide Analytical Services Protocol (ASP) Category B deliverables including a complete electronic (PDF) report and NYSDEC EQulS electronic data deliverable (EDD). All laboratory deliverables will be validated in accordance with USEPA Contract Laboratory Program (CLP) guidelines, with the validation results documented in a Data Usability Summary Report (DUSR). The final validated data will be submitted to the NYSDEC EQulS database system.

### **3.3.7 Health and Safety Plan**

All field activities will be conducted in accordance with a Site-specific health and safety plan (HASP) that conforms to the Generic HASP for the Site and the health and safety provisions of the Occupational Safety and Health Administration (OSHA) Hazardous Waste Site Operations regulations in Title 29 of the Code of Federal Regulations Part 1910 (29 CFR 1910).

Sampling will involve de minimis disturbance of soil, and volatile organic compounds (VOCs) are not constituents of concern. As such, soil sampling activities are not anticipated to generate dust or VOCs in ambient air beyond the immediate work area. Therefore, air monitoring will not be conducted.

## **3.4 Task 4: Reporting**

The findings of the PDI field activities (Tasks 2 and 3) will be documented in a brief report that will describe the activities conducted and associated results, including analytical data summary tables, laboratory reports, DUSRs, and figures showing proposed excavation areas and depths. A draft of the report will be submitted electronically to NYSDEC for review, along with the NYSDEC EQulS EDD submittal. Photographs and other supporting information collected during the PDI will be maintained for internal use by the project team in developing a remedial design as part of the CMI phase.



## 4. Proposed Schedule

The following schedule is proposed for the PDI, subject to timely property access permission and favorable weather and field conditions, and receipt of NYSDEC approval of the PDI Work Plan by March 6, 2020:

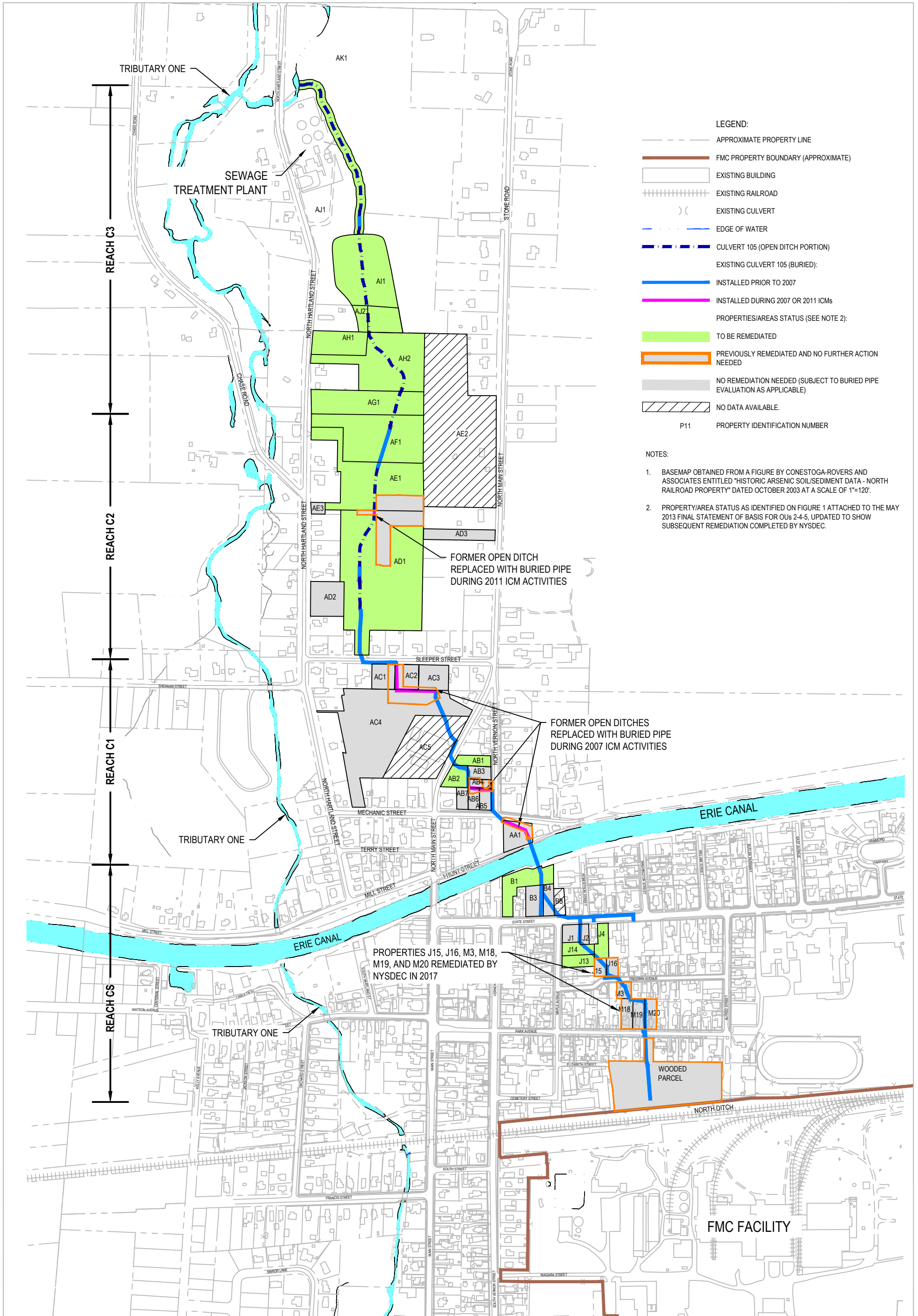
Start Date	Estimated Duration	Activity
March 9, 2020	4 weeks	Community participation activities, including meeting with property owners to discuss and obtain access permission, pre-investigation preparation, and notification to the NYSDEC of field work.
April 6, 2020	8-10 weeks	Complete property inspections, utility clearance, survey of properties, staking, and survey of proposed sampling locations. Undertake soil sample collection after all pre-sampling activities have been completed.
June 15, 2020	4 weeks	Complete soil sample analysis and data validation.
July 6, 2020	4 weeks	Begin compilation of analytical data and draft report to NYSDEC.
August 10, 2020	-	Submission of report to the NYSDEC

If additional sampling is proposed based on the initial results, and approved by the NYSDEC, then efforts will be made to complete the additional sampling and analysis in an expeditious manner, based on a schedule adjustment to be established in coordination with the NYSDEC.



## 5. References

- Arcadis. 2009. RCRA Facility Investigation Report Volume IV - Culvert 105 and Flood Zone. Final May.
- Arcadis. 2010. 2007 Early Actions Construction Report. January.
- Arcadis. 2011. Corrective Measures Study Report - Suspected Air Deposition and Culvert 105 Study Areas. Draft May.
- Arcadis. 2012. 2011 Interim Corrective Measure Construction Report for Properties AD1 and AE1. March.
- Geomatrix Consultants and Conestoga-Rovers & Associates. 2003. Tributary One South of Pearson/Stone Roads and Culvert 105 North of the Canal RFI/CMS Work Plan. October.
- NYSDEC. 2013. Final Statement of Basis - OUs 2, 4 and 5. May.
- NYSDEC and FMC Corporation. 2019. Order on Consent and Administrative Settlement (Index No. CO 9-20140625-40) between FMC and the New York State Department of Environmental Conservation (NYSDEC), effective June 6, 2019.



**LEGEND:**

- APPROXIMATE PROPERTY LINE
- FMC PROPERTY BOUNDARY (APPROXIMATE)
- ▭ EXISTING BUILDING
- ++++ EXISTING RAILROAD
- )) EXISTING CULVERT
- EDGE OF WATER
- CULVERT 105 (OPEN DITCH PORTION)
- EXISTING CULVERT 105 (BURIED):
- INSTALLED PRIOR TO 2007
- INSTALLED DURING 2007 OR 2011 ICMs

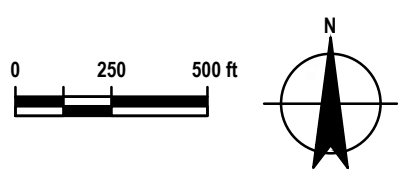
**PROPERTIES/AREAS STATUS (SEE NOTE 2):**

- ▭ TO BE REMEDIATED
- ▭ PREVIOUSLY REMEDIATED AND NO FURTHER ACTION NEEDED
- ▭ NO REMEDIATION NEEDED (SUBJECT TO BURIED PIPE EVALUATION AS APPLICABLE)
- ▨ NO DATA AVAILABLE.

P11 PROPERTY IDENTIFICATION NUMBER

**NOTES:**

- BASEMAP OBTAINED FROM A FIGURE BY CONESTOGA-ROVERS AND ASSOCIATES ENTITLED "HISTORIC ARSENIC SOIL/SEDIMENT DATA - NORTH RAILROAD PROPERTY" DATED OCTOBER 2003 AT A SCALE OF 1"=120'.
- PROPERTY/AREA STATUS AS IDENTIFIED ON FIGURE 1 ATTACHED TO THE MAY 2013 FINAL STATEMENT OF BASIS FOR OUs 2-4-5, UPDATED TO SHOW SUBSEQUENT REMEDIATION COMPLETED BY NYSDEC.

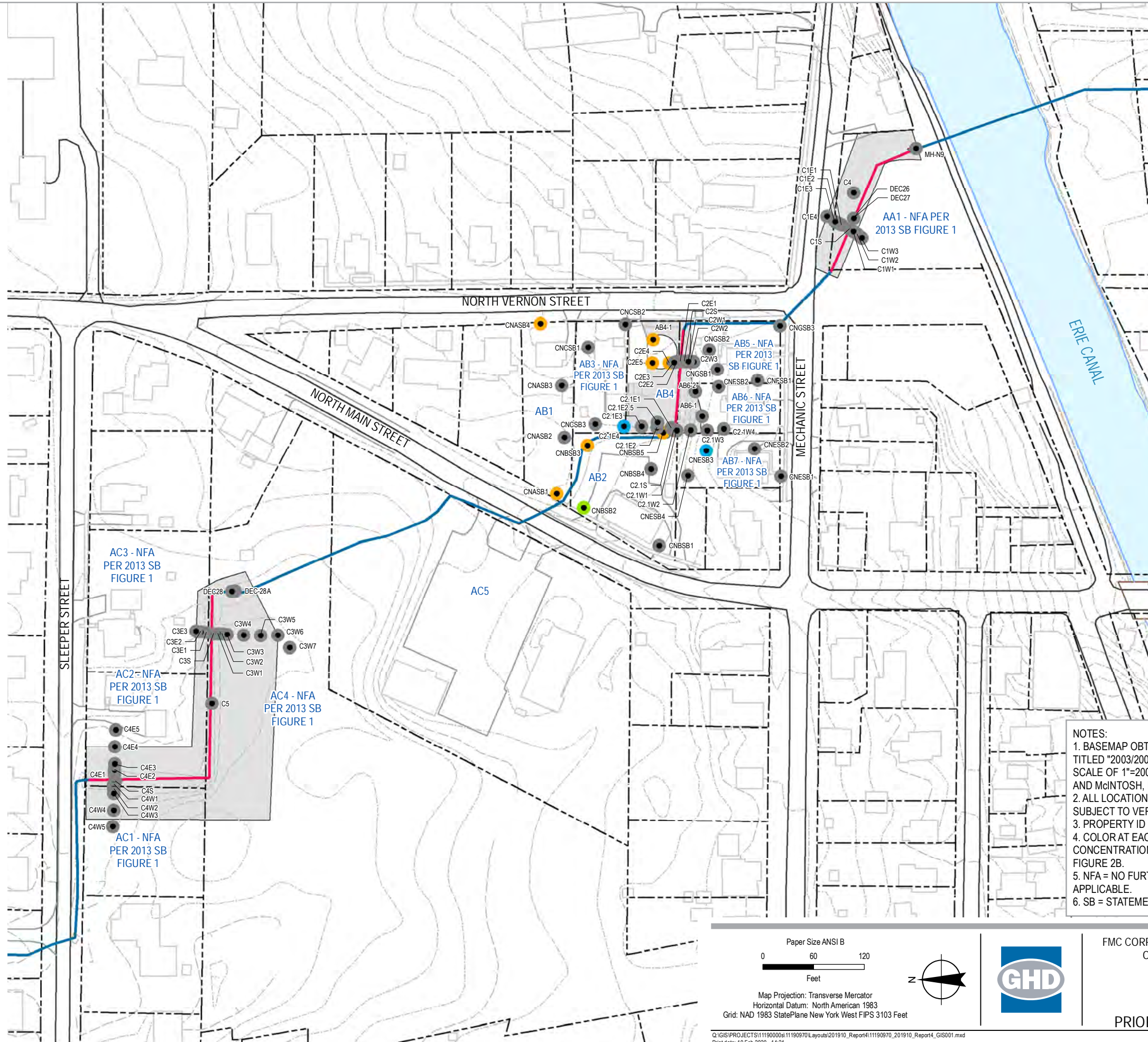


FMC CORPORATION, MIDDLEPORT, NEW YORK  
OU5 NORTH PDI WORK PLAN

Project No. 11190970  
Date November 2019

LOCATION MAP

FIGURE 1



**LEGEND**

**ARSENIC SAMPLE CONCENTRATIONS**

- > 50 mg/kg
- 40 - 50 mg/kg
- 30 - 40 mg/kg
- 20 - 30 mg/kg
- ≤ 20 mg/kg

- CULVERT 105 BURIED PIPE
- CULVERT 105 BURIED PIPE INSTALLED 2007
- AREAS PREVIOUSLY REMEDIATED BY FMC
- AA1 PROPERTY IDs

**NOTES:**

1. BASEMAP OBTAINED FROM A FIGURE BY CONESTOGA-ROVERS AND ASSOCIATES TITLED "2003/2004 PROPOSED SAMPLING LOCATIONS" DATED OCTOBER 2003 AT A SCALE OF 1"=200' AND ADDITIONAL SURVEY INFORMATION PROVIDED BY McINTOSH AND McINTOSH, INC. SURVEYORS.
2. ALL LOCATIONS AND PROPERTY BOUNDARIES SHOWN ARE APPROXIMATE AND SUBJECT TO VERIFICATION.
3. PROPERTY ID IS NOT RELATED TO STREET ADDRESS OR TAX PARCEL.
4. COLOR AT EACH SAMPLING LOCATION REPRESENTS THE MAXIMUM CONCENTRATION AT ANY SAMPLE DEPTH INTERVAL. SAMPLE DATA SHOWN ON FIGURE 2B.
5. NFA = NO FURTHER ACTION, SUBJECT TO EVALUATION OF BURIED PIPE AS APPLICABLE.
6. SB = STATEMENT OF BASIS.

Paper Size ANSI B

Map Projection: Transverse Mercator  
Horizontal Datum: North American 1983  
Grid: NAD 1983 StatePlane New York West FIPS 3103 Feet

FMC CORPORATION, MIDDLEPORT, NEW YORK  
OU5 NORTH PDI WORK PLAN

Project No. 11190970  
Revision No. -  
Date Feb 10, 2020

**REACH C1**  
**PRIOR SAMPLING LOCATIONS**

**FIGURE 2A**

SAMPLE ID	DATE	ARSENIC CONCENTRATION (MG/KG)							
		0-3"	3-6"	6-9"	9-12"	12-18"	18-24"	24-30"	30-36"
<b>PROPERTY AA1</b>									
C1E1	10/11/2002	115 J	219 J	177 J	--	--	--	--	--
C1E1	7/2/2007	--	--	--	91.7 J / 110	46.9 J	19.6 J	8.1 J	--
C1E2	10/11/2002	25.9 J	23.4 J	46.6 J	--	--	--	--	--
C1E3	10/11/2002	15.4 J	14.9 J	37.5 J / 33	--	--	--	--	--
C1E3	7/2/2007	--	--	--	26.1 J	18.5 J	2.3 J	1.8 J	--
C1E4	4/27/2004	5.0	10.6 J	18.6	16.6	2.8	--	--	--
C1S	10/11/2002	176 J	82.9 J	7.5 J	5.7 J	--	--	--	--
C1W1	10/11/2002	18.4 J	17.9 J / 18.5	6.8 J / 9.8 J	--	--	--	--	--
C1W2	10/10/2002	--	6.4 J	2.4 J	--	--	--	--	--
C1W2	10/11/2002	14.1 J	--	--	--	--	--	--	--
C1W3	10/10/2002	17.2 J	17.4 J	9.5 J	--	--	--	--	--
C4	11/26/1990	--	--	44.0	--	--	--	--	--
C4	7/2/2007	--	--	--	40.4 J	21.6 J	12.4 J	3.8 J	--
C4	9/4/1990	48.3	--	--	--	--	--	--	--
MH-N9	11/11/2004	63.0	--	--	--	--	--	--	--
DEC26	11/1/1986	34.4	--	--	--	--	--	--	--
DEC27	11/1/1986	61.6	--	--	--	--	--	--	--
<b>PROPERTY AB1</b>									
CNASB1	4/27/2004	9 J	9.9 J	10.3 J	65.9 J / 76.4 J	31.1	5.5	3.9	--
CNASB2	4/27/2004	8.5 J	9.5 J	9.4 J / 11.6 J	5.6 J	--	--	--	--
CNASB3	4/27/2004	14.0 J	13.6 J	5.8 J	2.8	--	--	--	--
CNASB4	4/27/2004	95.9	109 J	40.4	7.7	--	--	--	--
<b>PROPERTY AB2</b>									
CNBSB1	4/27/2004	2.8	4.7 J	9.9	3.9	--	--	--	--
CNBSB2	4/27/2004	4.1	4.1 J	14.7	31.1 J / 32.6 J	32.0	9.7	--	--
CNBSB3	4/27/2004	24.0 J	47.5 J	32.5 J	87.1 J	217	92.8	13.5	--
CNBSB4	4/27/2004	12.8 J	13.8 J	8.9 J	16.5 J	--	--	--	--
CNBSB5	4/27/2004	199 J	32.6 J	17.5 J	2.5 J	--	--	--	--
<b>PROPERTY AB3</b>									
C2.1E4	4/27/2004	9.1	14.1 J	13.5	20.1 / 14.2 J	7.3	--	--	--
CNCB1	4/27/2004	7.5	12.3 J	4.1	3.7	--	--	--	--
CNCB2	4/27/2004	4.6 / 4.1 J	5.5 J	5.0	6.4	--	--	--	--
CNCB3	4/27/2004	9.1	8.0	6.4	2.7	--	--	--	--
<b>PROPERTY AB4</b>									
AB4-1	5/31/2007	31.8 J	34.7 J	51.8 J / 48.3	27.5 J	6.7 J	5.7 J	5.8 J	--
C2.1E1	4/27/2004	10.6 J	83.9 J	78.3 J	2.6 J	3.1 J	--	--	--
C2.1E2	4/27/2004	24.7 J	38.5 J	15.9 J	7.2 J	29.3 J	--	--	--
C2.1E2	5/31/2007	--	--	--	7.9 J	5.0 J	--	--	--
C2.1E2.5	5/31/2007	--	--	--	--	--	19.6 J	15.7 J	--
C2.1E3	4/27/2004	36.9 J	36.7 J	29.6 J	4.8 J / 4.7	3.8	--	--	--
C2.1S	4/26/2004	28.8	5.5 J	2.6 J / 2.7	2.2	2.4	--	--	--
C2.1W1	4/26/2004	32.3	57.6 J	42.5	16.4	5.1	--	--	--
C2E2	10/16/2002	11.3 J	21.3 J	16.9 J	--	--	--	--	--
C2E3	10/16/2002	153 J	199 J	126 J	--	--	--	--	--
C2E3	5/31/2007	--	--	--	130 J	10.2 J	3.5 J	3.7 J	--
C2E4	4/27/2004	97.8 J	98.7 J	82.6 J	16.7 J / 15.6 J	3.4 J	--	--	--
C2E5	4/27/2004	76.5 J	97.6 J	47.1 J	4.4 J	2.3 J	--	--	--

SAMPLE ID	DATE	ARSENIC CONCENTRATION (MG/KG)							
		0-3"	3-6"	6-9"	9-12"	12-18"	18-24"	24-30"	30-36"
<b>PROPERTY AB5</b>									
C2E1	10/16/2002	112 / 137 J	7.7 J	3.7 J	--	--	--	--	--
C2S	10/16/2002	69.7 J / 69.3 / 58.4	2.8 J	8.0 J	6.4 J	--	--	--	--
C2W1	10/16/2002	16.9 J	8.2 J	7.9 J	--	--	--	--	--
C2W2	10/16/2002	13.8 J	10.9 J	7.1 J / 5.3 J	--	--	--	--	--
C2W3	10/16/2002	10.8 J	6.5 J	5.1 J	--	--	--	--	--
CNFSB1	4/26/2004	6.3	6.0 J	8.9	2.4	--	--	--	--
CNGSB1	4/26/2004	9.8	7.5 J	4.1	2.4	--	--	--	--
CNGSB2	4/26/2004	11.6	10.6 J	4.7	3.1	--	--	--	--
CNGSB3	4/26/2004	--	17.3	16.5 / 19.2 J	13.3	--	--	--	--
<b>PROPERTY AB6</b>									
AB6-1	7/2/2007	6.6 J	6.6 J	6.7 J	7.7 J	--	--	--	--
AB6-2	7/2/2007	6.0 J	5.6 J	7.5 J	14.1 J	--	--	--	--
C2.1W2	4/26/2004	47.7	54.9 J	37.8	9.6	3.6	--	--	--
C2.1W3	4/26/2004	14.1	18.7 J	13.5 / 14.8	4.7	3.5	--	--	--
C2.1W4	4/26/2004	6.4	5.2 J	7.2	7.7 / 6.9	19.0	--	--	--
CNFSB2	4/26/2004	7.1	6.8 J	12.7	13.8 / 15.4 J	--	--	--	--
<b>PROPERTY AB7</b>									
CNESB1	4/26/2004	16.3	13.0 J	6.5	3.2	--	--	--	--
CNESB2	4/26/2004	10.0	10.4 J	6.5 / 7.4	3.2	--	--	--	--
CNESB3	4/26/2004	4.4	11.9 J	23.8	12.2	--	--	--	--
CNESB4	4/26/2004	6.9 / 6.3 J	9.8 J	8.0	4.0	--	--	--	--
<b>PROPERTY AC1</b>									
C4W2	10/16/2002	142	123	4.0 / 4.1	--	--	--	--	--
C4W3	10/16/2002	149	164	9.0	--	--	--	--	--
C4W4	3/19/2004	22.6 / 22.5	22.3	14.0	4.9	2.6	--	--	--
C4W5	3/19/2004	14.7	14.1	3.0	1.8	2.5	--	--	--
<b>PROPERTY AC2</b>									
C4E1	10/16/2002	41.5 J	13.2 J	5.8 J	--	--	--	--	--
C4E2	10/16/2002	31.2 J	26.8 J	23.1 J	--	--	--	--	--
C4E3	10/16/2002	33.1 J	23.3 J	3.9 / 5.6 J	--	--	--	--	--
C4E4	3/19/2004	12.3	13.2	11.2	5.6 / 3.6	2.6	--	--	--
C4E5	3/19/2004	7.3	8.8	11.0	5.3 / 5.2	3.6	--	--	--
C4S	10/16/2002	29.6 J	17.1 J	3.5 J / 2.9	4.4 J	--	--	--	--
C4W1	10/16/2002	62.4	65.6	21.9 J	--	--	--	--	--
<b>PROPERTY AC3</b>									
C3E1	10/16/2002	32.5 J	25.2 J	8.9 J / 8.6 J	--	--	--	--	--
C3E2	10/16/2002	23.3 J	18.7 J	12.9 J	--	--	--	--	--
C3E3	10/16/2002	13.8 J	13.0 J	8.1 J	--	--	--	--	--
<b>PROPERTY AC4</b>									
C3S	10/16/2002	23.1 J	15.7 / 18.3	3.1 J	3.7 J	--	--	--	--
C3W1	10/16/2002	16.6 J	8.1 J	16.9 J	--	--	--	--	--
C3W2	10/16/2002	82.9 J	34.3 J / 25.7	8.4 J / 42.6 J	--	--	--	--	--
C3W3	10/16/2002	53.4 J	9.4 J	40.7 J	--	--	--	--	--
C3W3	5/31/2007	--	--	--	9.4	5.1	3.5 / 3.8	3.2	--
C3W4	3/19/2004	42.6	57.6	42.0	3.9	2.0	--	--	--
C3W5	3/19/2004	56.1	46.3	15.4	3.8	2.3	--	--	--
C3W6	11/1/2004	16.2	15.4	7.7	1.9 / 2.6	2.7 / 3.3	--	--	--
C3W7	11/1/2004	16.0	12.0	10.5	4.3	3.3	--	--	--
C5	11/28/1990	--	--	145	--	--	--	--	--
C5	5/31/2007	--	--	--	32.6 J	3.7	2.6	2.3	--
C5	9/5/1990	150	--	--	--	--	--	--	--
DEC28A	5/31/2007	--	--	--	41.2	5.9	12.1	3.7	--
DEC28	11/1/1986	49.2	--	--	--	--	--	--	--

ARSENIC SAMPLE CONCENTRATIONS:

- > 50 mg/kg
- 40 - 50 mg/kg
- 30 - 40 mg/kg
- 20 - 30 mg/kg
- ≤ 20 mg/kg
- SAMPLE WAS EXCAVATED AND NO LONGER PRESENT

- NOTES:
1. SAMPLE DEPTHS ARE PRESENTED IN INCHES.
  2. SOIL ARSENIC RESULT WITH DIAGONAL LINE CORRESPONDS TO SOIL THAT WAS REMOVED BY 2007 EARLY ACTION AND REPLACED WITH CLEAN FILL. REFER TO 2007 EARLY ACTION CONSTRUCTION REPORT (2010) FOR DETAILED INFORMATION ON EXTENT OF SOIL REMOVED.
  3. ARSENIC CONCENTRATIONS IN MILLIGRAMS PER KILOGRAM (MG/KG), EQUIVALENT TO PARTS-PER-MILLION (PPM).
  4. MULTIPLE RESULTS REPORTED FOR THE SAME SAMPLE ARE DUPLICATES OR SPLITS ANALYZED FOR QUALITY ASSURANCE/QUALITY CONTROL PURPOSES.
  5. "J" DATA QUALIFIER INDICATES THAT ARSENIC WAS POSITIVELY IDENTIFIED; HOWEVER, THE RESULT IS AN ESTIMATED CONCENTRATION.



FMC CORPORATION, MIDDLEPORT, NEW YORK  
OU5 NORTH PDI WORK PLAN

Project No. 11190970  
Date November 2019

REACH C1  
PRIOR ANALYTICAL DATA

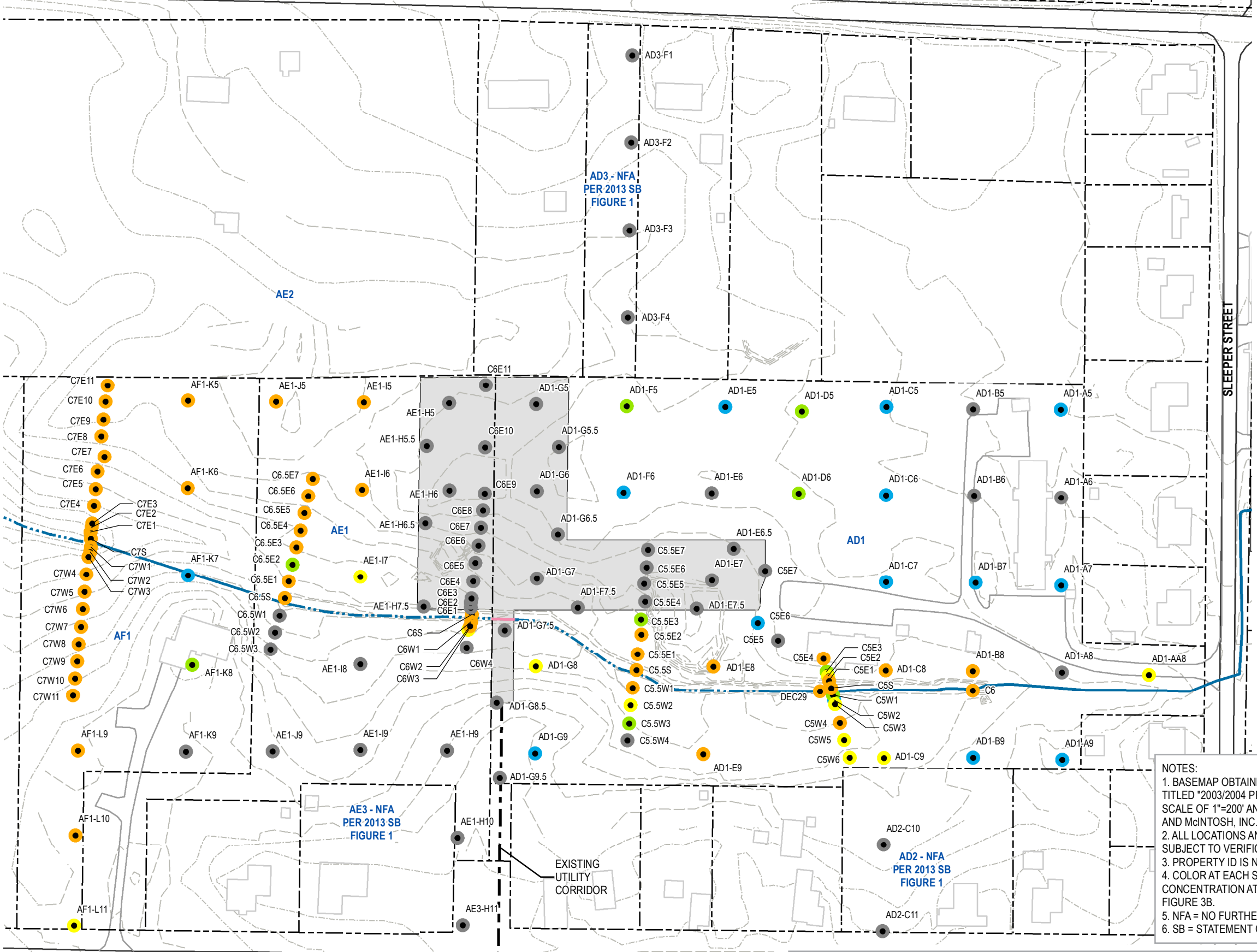
FIGURE 2B

**LEGEND**

**ARSENIC SAMPLE CONCENTRATIONS**

- > 50 mg/kg
- 40 - 50 mg/kg
- 30 - 40 mg/kg
- 20 - 30 mg/kg
- ≤ 20 mg/kg

- CULVERT 105 BURIED PIPE
- - - CULVERT 105 (OPEN DITCH PORTION)
- CULVERT 105 BURIED PIPE INSTALLED 2011
- AREAS PREVIOUSLY REMEDIATED BY FMC
- AD1 PROPERTY IDs



**NOTES:**

1. BASEMAP OBTAINED FROM A FIGURE BY CONESTOGA-ROVERS AND ASSOCIATES TITLED "2003/2004 PROPOSED SAMPLING LOCATIONS" DATED OCTOBER 2003 AT A SCALE OF 1"=200' AND ADDITIONAL SURVEY INFORMATION PROVIDED BY McINTOSH AND McINTOSH, INC. SURVEYORS.
2. ALL LOCATIONS AND PROPERTY BOUNDARIES SHOWN ARE APPROXIMATE AND SUBJECT TO VERIFICATION.
3. PROPERTY ID IS NOT RELATED TO STREET ADDRESS OR TAX PARCEL.
4. COLOR AT EACH SAMPLING LOCATION REPRESENTS THE MAXIMUM CONCENTRATION AT ANY SAMPLE DEPTH INTERVAL. SAMPLE DATA SHOWN ON FIGURE 3B.
5. NFA = NO FURTHER ACTION.
6. SB = STATEMENT OF BASIS.

Paper Size ANSI B

Feet

Map Projection: Transverse Mercator  
Horizontal Datum: North American 1983  
Grid: NAD 1983 StatePlane New York West FIPS 3103 Feet

**FMC CORPORATION, MIDDLEPORT, NEW YORK**  
**OU5 NORTH PDI WORK PLAN**

Project No. **11190970**  
Revision No. **-**  
Date **Nov 14, 2019**

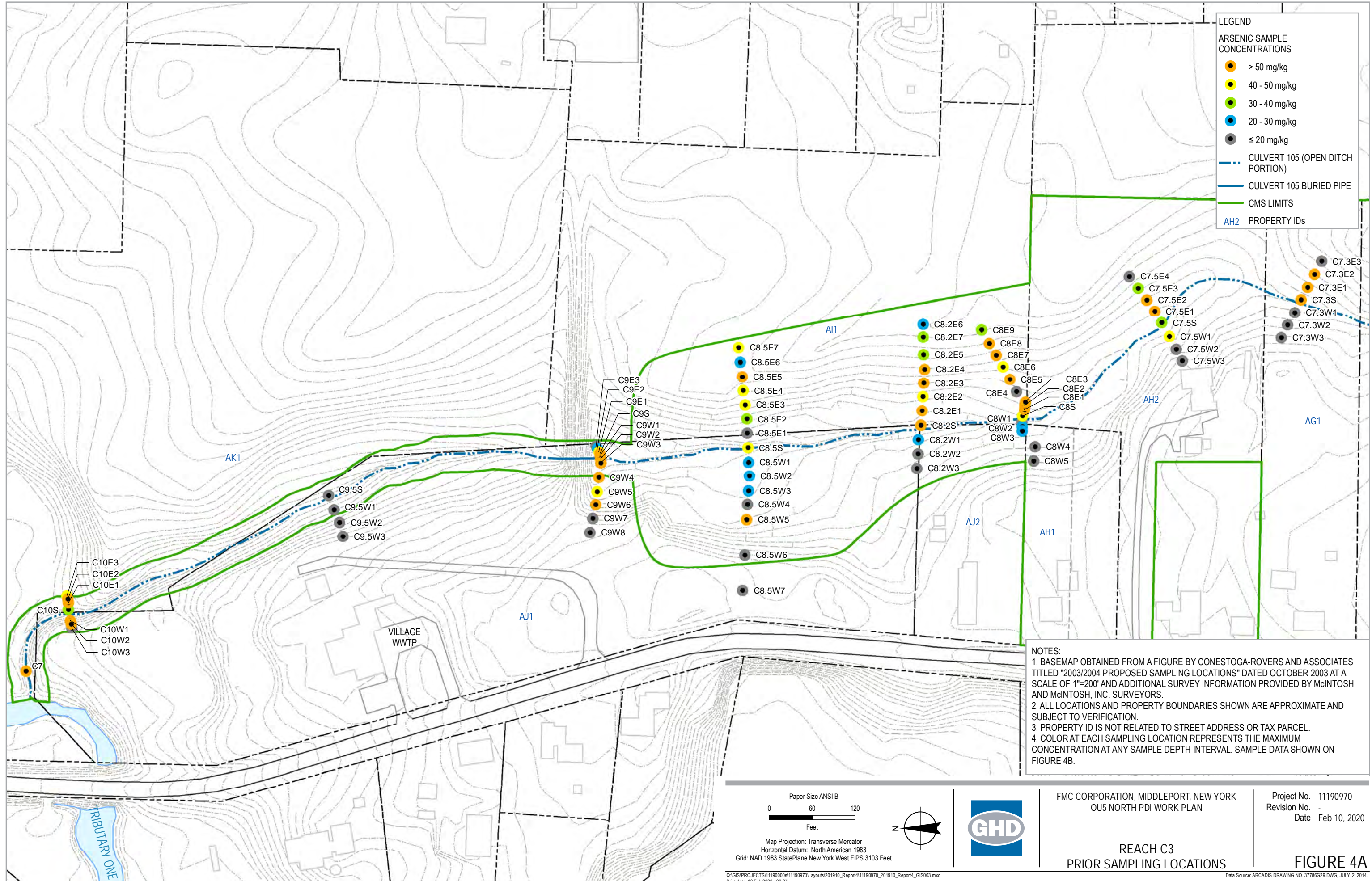
**REACH C2**  
**PRIOR SAMPLING LOCATIONS**

**FIGURE 3A**

SAMPLE ID	DATE	ARSENIC CONCENTRATION (MG/KG)									
		0-3"	3-6"	6-12"	12-18"	18-24"	24-30"	24-36"	30-36"	36-42"	42-48"
<b>PROPERTY AD1</b>											
AD1-A5	11/28/2005	19.8	20.1	14.1	4.3	3.8	--	--	--	--	--
AD1-A6	11/28/2005	13.2	10.0	19.2	4.6 / 7.9	4.9	--	--	--	--	--
AD1-A7	11/28/2005	12.5	14.9	13.7	6.0	20.1	--	--	--	--	--
AD1-A8	11/28/2005	13.7	9.2	9.6	4.2	3.5	--	--	--	--	--
AD1-A9	11/28/2005	27.6	28.2	12.0	2.7	2.8 / 2.5	--	--	--	--	--
AD1-AA8	11/28/2005	19.9	19.4	26.2	45.4	4.1	--	--	--	--	--
AD1-B5	11/28/2005	2.4	--	2.9 / 4.9 / 4.5	4.2	4.3	--	--	--	--	--
AD1-B6	11/28/2005	4.1	--	5.3 / 6.3	4.8	4.7	--	--	--	--	--
AD1-B7	11/28/2005	12.3 / 11.5	15.2	20.6	8.0	3.4	--	--	--	--	--
AD1-B8	11/28/2005	74.1	66.9	75.4	24.7	2.2	--	--	--	--	--
AD1-B9	11/28/2005	17.5	26.6	12.0	3.4	2.9	--	--	--	--	--
AD1-C5	11/28/2005	--	21.6 J	--	--	--	--	--	--	--	--
AD1-C5	11/29/2005	16.9	--	17.6 / 18.5	5.1	6.0	--	--	--	--	--
AD1-C6	11/29/2005	23.1 J	25.1	8.0 J / 10.2	5.3	16.0 J	--	--	--	--	--
AD1-C7	11/28/2005	28.8	5.3	3.4	3.5	3.6	--	--	--	--	--
AD1-C8	11/28/2005	44.0	37.4	166	129 / 141	28.0	--	--	--	--	--
AD1-C9	11/28/2005	34.2 / 45.3	12.7	3.7	3.1	3.1	--	--	--	--	--
AD1-D5	11/28/2005	--	36.2 J	--	--	--	--	--	--	--	--
AD1-D5	11/29/2005	36.8 J	--	28.1 J	7.9	3.6 J	--	--	--	--	--
AD1-D6	11/28/2005	--	16.6 J	--	--	--	--	--	--	--	--
AD1-D6	11/29/2005	19.4 J	--	27.2 J	36.9 J / 5.9	12.2	--	--	--	--	--
AD1-E5	11/29/2005	18.0	22.8 J	17.0	5.2 / 3.1 J	4.3	--	--	--	--	--
AD1-E6	11/29/2005	16.4 J	14.7 J	12.1	5.0 J	4.5 J	--	--	--	--	--
AD1-E6.5	8/29/2011	31.0	24.0	4.2	4.0	--	--	--	--	--	--
AD1-E7	11/29/2005	24.6	27.7 J	20.7 J	8.3 J	4.7 J	--	--	--	--	--
AD1-E7.5	8/29/2011	4.5	6.2	3.1	4.5	--	--	--	--	--	--
AD1-E8	11/29/2005	20.5 J	27.5 J	41.0 J	63.1 J / 51.8 J	12.7	--	--	--	--	--
AD1-E9	11/29/2005	46.9	52.6 J	26.6 / 15.2 J	10.1	6.8	--	--	--	--	--
AD1-F5	11/29/2005	35.7	30.4 J	27.5	10.5	5.9	--	--	--	--	--
AD1-F6	11/29/2005	29.0	29.0 J	12.2	4.8 / 4.5 / 4.2	5.1	--	--	--	--	--
AD1-F7.5	8/29/2011	140	59.0	5.7 / 6.5	5.8	2.7	--	--	--	--	--
AD1-G5	11/29/2005	34.1	39.7 J	12.8	5.4	5.1	--	--	--	--	--
AD1-G5.5	8/29/2011	27.0	9.9	3.5	3.5	--	--	--	--	--	--
AD1-G6	11/29/2005	18.7	6.9 J	3.8	3.0	5.6 B	--	--	--	--	--
AD1-G6.5	8/29/2011	46.0	26.0	5.2	5.0	4.3	--	--	--	--	--
AD1-G7	11/29/2005	46.4	39.6 J	35.8	38.1	35.7	--	--	--	--	--
AD1-G7	8/29/2011	--	--	--	--	3.3	--	--	--	--	--
AD1-G7.5	8/29/2011	50.0	17.0	7.8	11.0	3.3	--	--	--	--	--
AD1-G8	11/29/2005	49.8	38.9 J	14.4 / 13.9	5.9	6.5	--	--	--	--	--
AD1-G8.5	8/29/2011	8.6	7.4	5.6	5.0	--	--	--	--	--	--
AD1-G9	11/29/2005	22.4	24.5 J	12.7	3.9	5.1	--	--	--	--	--
AD1-G9.5	8/29/2011	13.0	6.6	5.3	3.4	--	--	--	--	--	--
C5E1	10/16/2002	49.8	50.4	5.3	--	--	--	--	--	--	--
C5E2	10/16/2002	22.6	46.8	35.6	--	--	--	--	--	--	--
C5E3	10/16/2002	33.9 J	28.9 J	19.6 J	--	--	--	--	--	--	--
C5E4	3/19/2004	29.3	23.6	56.5 / 51	29.5	28.7	8.3 J	3.9 J	3.2 J	--	--
C5E5	11/1/2004	14.2 J	13.2	15.8 J	16.3 J	12.8 J	--	--	--	--	--
C5E6	11/1/2004	13.5	14.6 / 18.8	18.3	24.5	10.1	4.9	2.6	2.7	2.4	--
C5E7	11/1/2004	21.0	22.2 / 24.8	24.2	12.3	5.1	2.9 / 2.7	3.9	2.2	--	--
C5S	10/16/2002	94.5	9.7	2.7	5.7 / 4.5	--	--	--	--	--	--
C5W1	10/16/2002	31.6 J / 30.4	4.0 J	3.3 J / 2.1 J	--	--	--	--	--	--	--
C5W2	10/16/2002	0.22 UJ	21.7 J	3.0 J	--	--	--	--	--	--	--
C5W3	10/16/2002	24.8 J	40.1 J	8.5 J	--	--	--	--	--	--	--
C5W4	3/22/2004	44.7	52.4 J	6.3 J / 7.9 J / 7.9	3.7	2.9	--	--	--	--	--
C5W5	11/1/2004	34.6 J	46.8	45.6 J	9.9 J	3.8 J	--	--	--	--	--
C5W6	11/1/2004	41.1	39.4	16.3	6.0	3.6	3.2	--	--	--	--
C5.5E1	3/19/2004	118	90.0	67.7	13.6 / 10.8	3.4	--	--	--	--	--
C5.5E2	3/19/2004	45.4	49.9	58.7	8.6	3.8	--	--	--	--	--
C5.5E3	3/19/2004	34.9	33.7	3.0	4.9	2.1 / 2.1	--	--	--	--	--
C5.5E4	11/1/2004	31.1 J	39.6	18.8 J	3.6 J	3.3 J	--	--	--	--	--
C5.5E5	11/1/2004	35.3	32.6	32.8	6.9 / 10.4	3.4	--	--	--	--	--
C5.5E6	11/1/2004	25.4	22.6	11.4	4.0	3.9	--	--	--	--	--
C5.5E7	11/1/2004	36.3	33.7	23.6	4.8	3.4	--	--	--	--	--
C5.5S	3/19/2004	25.8	76.1	30.4	7.3	2.2	--	--	--	--	--
C5.5W1	3/22/2004	166 / 177 J	259 J	211	16.9	5.6	--	--	--	--	--
C5.5W2	3/22/2004	43.9	48.3 J	30.8	6.5 / 6.1 J	7.2	--	--	--	--	--
C5.5W3	3/22/2004	39.0	39.9 J	24.0	2.7	2.8	--	--	--	--	--
C5.5W4	11/1/2004	15.5	18.9	10.8	3.6	3.4 / 4.8	--	--	--	--	--
C6	11/26/1990	--	--	12.5	--	--	--	--	--	--	--
C6	9/5/1990	123	--	--	--	--	--	--	--	--	--
DEC29	11/1/1986	432	--	--	--	--	--	--	--	--	--
<b>PROPERTY AD2</b>											
AD2-C10	11/29/2005	--	7.6	--	--	--	--	--	--	--	--
AD2-C10	12/12/2005	8.6	--	6.9	5.0	2.9	--	--	--	--	--
AD2-C11	12/12/2005	10.5 / 10.2	9.4	7.1	3.5	2.8	--	--	--	--	--
<b>PROPERTY AD3</b>											
AD3-F1	11/29/2005	8.3	14.0	8.5	3.7 J / 3.0 J	2.6	--	--	--	--	--
AD3-F2	11/29/2005	13.2	13.6 J	7.2 / 6.7	4.8	2.7	--	--	--	--	--
AD3-F3	11/29/2005	17.5	17.4 J	13.0	5.1 / 4.3 J / 5.2 J	4.9	--	--	--	--	--
AD3-F4	11/29/2005	19.1	14.1 J	5.9	2.6 / 2.8	4.7 B	--	--	--	--	--

SAMPLE ID	DATE	ARSENIC CONCENTRATION (MG/KG)									
		0-3"	3-6"	6-12"	12-18"	18-24"	24-30"	24-36"	30-36"	36-42"	42-48"
<b>PROPERTY AE1</b>											
AE1-H5	11/29/2005	--	234 J	--	--	--	--	--	--	--	--
AE1-H5	11/30/2005	225 J	--	65.1 J / 36.6 J	12.7 J	5.2	--	--	--	--	--
AE1-H5	8/29/2011	0.032 J	--	--	--	--	--	--	--	--	--
AE1-H5.5	8/29/2011	130	160	67.0	10.0	--	--	--	--	--	--
AE1-H6	11/29/2005	--	324	--	--	--	--	--	--	--	--
AE1-H6	11/30/2005	314 J	--	88.2 J	7.1	4.7 J	--	--	--	--	--
AE1-H6	8/29/2011	0.12	--	--	--	--	--	--	--	--	--
AE1-H6.5	8/29/2011	220	290	12.0	6.0	--	--	--	--	--	--
AE1-H7.5	8/29/2011	46.0	16.0 / 17.0	3.8	6.6	--	--	--	--	--	--
AE1-H9	11/30/2005	7.0 / 8.6	6.1	4.5 / 5.1 J	5.1 J	4.2 J	--	--	--	--	--
AE1-H10	11/29/2005	--	7.7	--	--	--	--	--	--	--	--
AE1-H10	11/30/2005	6.7 J	--	5.5	5.1 J	4.8 J	--	--	--	--	--
AE1-H5	11/30/2005	227 J	314	380	14.4 J	5.0 J	--	--	--	--	--
AE1-H6	11/30/2005	173 J	202	97.7 J / 98.5	7.2	5.4 J	--	--	--	--	--
AE1-H7	11/30/2005	44.1 J	33.4	27.9 J	3.9 J / 4.7 J	2.9	--	--	--	--	--
AE1-H8	11/30/2005	5.8 J	4.9	4.1 / 3.6	3.3 J	2.6 J	--	--	--	--	--
AE1-H9	11/30/2005	7.1	6.3	3.6 J	2.7 J	3.8 J	--	--	--	--	--
AE1-J5	11/30/2005	226	257	133 J	9.7 J	3.2 J	--	--	--	--	--
AE1-J9	12/1/2005	4.9	4.9	4.6	2.9 / 3.1 / 4.8	2.6	--	--	--	--	--
C6E1	10/16/2002	25.6 J	14.8 J	11.8 J	--	--	--	--	--	--	--
C6E2	10/16/2002	143 J	125 J / 118	66.2 J / 72.6 J	--	--	--	--	--	--	--
C6E2	8/29/2011	--	--	--	18.0	5.6	--	--	--	--	--
C6E3	10/16/2002	142 J	138 J	96.8 J	--	--	--	--	--	--	--
C6E3	8/29/2011	--	--	--	5.6	4.8 / 4.6	--	--	--	--	--
C6E4	3/19/2004	57.2 / 63.2	62.1	29.0	2.6	2.1	--	--	--	--	--
C6E5	3/19/2004	128	22.4 J	5.4	2.6	2.1	--	--	--	--	--
C6E6	11/1/2004	174 J	230	23.9 J / 16.3 J	3.4 J	3.1 J	--	--	--	--	--
C6E7	11/1/2004	166	267	44.6	3.0	2.7	--	--	--	--	--
C6E8	11/1/2004	169	231	53.9 / 40.1	5.1	4.8	--				





**LEGEND**

**ARSENIC SAMPLE CONCENTRATIONS**

- > 50 mg/kg
- 40 - 50 mg/kg
- 30 - 40 mg/kg
- 20 - 30 mg/kg
- ≤ 20 mg/kg

- CULVERT 105 (OPEN DITCH PORTION)
- CULVERT 105 BURIED PIPE
- CMS LIMITS
- AH2 PROPERTY IDs

**NOTES:**

1. BASEMAP OBTAINED FROM A FIGURE BY CONESTOGA-ROVERS AND ASSOCIATES TITLED "2003/2004 PROPOSED SAMPLING LOCATIONS" DATED OCTOBER 2003 AT A SCALE OF 1"=200' AND ADDITIONAL SURVEY INFORMATION PROVIDED BY McINTOSH AND McINTOSH, INC. SURVEYORS.
2. ALL LOCATIONS AND PROPERTY BOUNDARIES SHOWN ARE APPROXIMATE AND SUBJECT TO VERIFICATION.
3. PROPERTY ID IS NOT RELATED TO STREET ADDRESS OR TAX PARCEL.
4. COLOR AT EACH SAMPLING LOCATION REPRESENTS THE MAXIMUM CONCENTRATION AT ANY SAMPLE DEPTH INTERVAL. SAMPLE DATA SHOWN ON FIGURE 4B.

Paper Size ANSI B

0 60 120  
Feet

Map Projection: Transverse Mercator  
Horizontal Datum: North American 1983  
Grid: NAD 1983 StatePlane New York West FIPS 3103 Feet

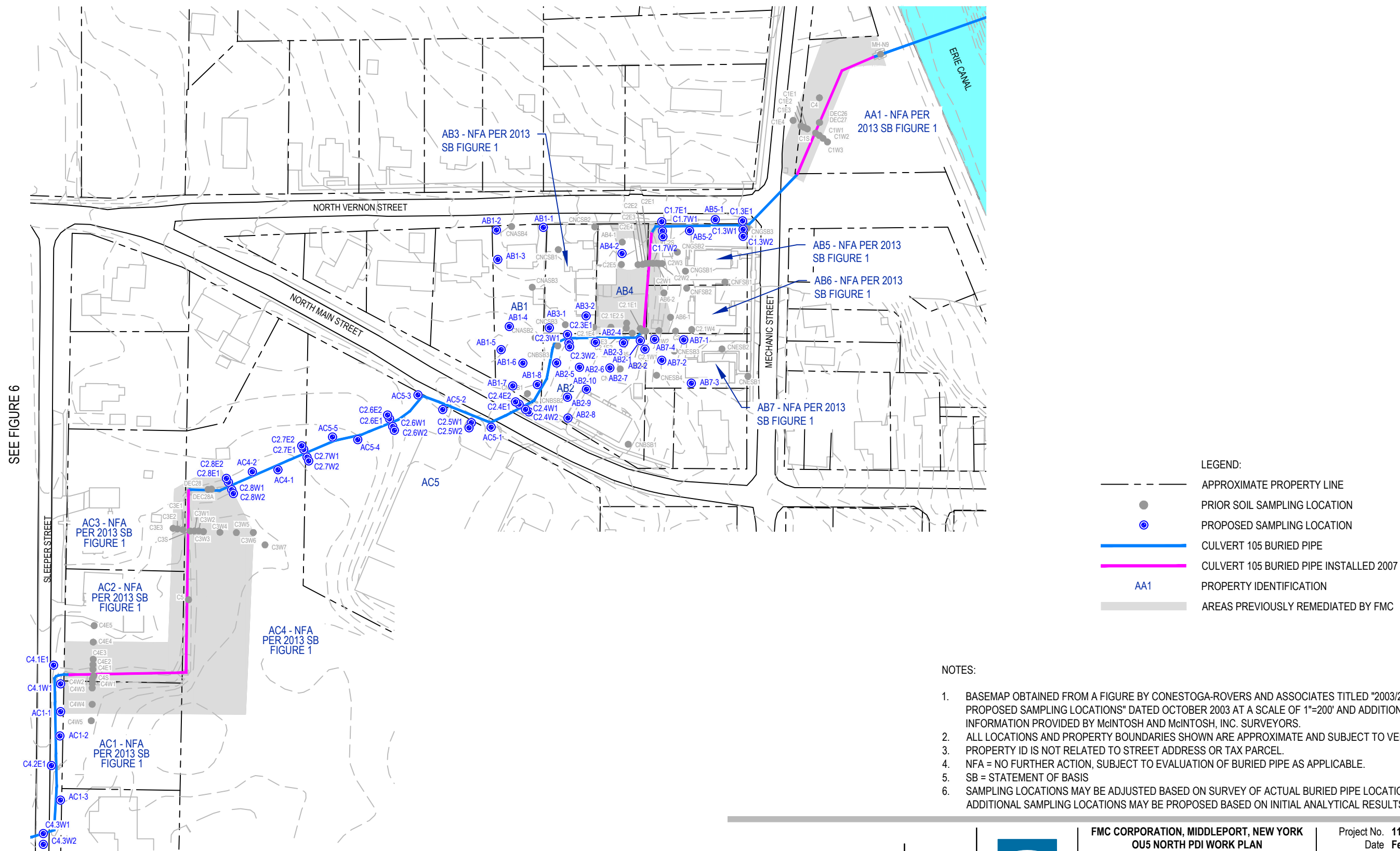
FMC CORPORATION, MIDDLEPORT, NEW YORK  
OU5 NORTH PDI WORK PLAN

Project No. 11190970  
Revision No. -  
Date Feb 10, 2020

**REACH C3  
PRIOR SAMPLING LOCATIONS**

**FIGURE 4A**

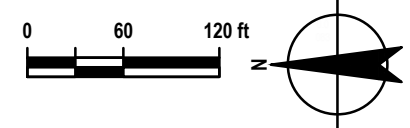




SEE FIGURE 6

- LEGEND:
- APPROXIMATE PROPERTY LINE
  - PRIOR SOIL SAMPLING LOCATION
  - ⊙ PROPOSED SAMPLING LOCATION
  - CULVERT 105 BURIED PIPE
  - CULVERT 105 BURIED PIPE INSTALLED 2007
  - AA1 PROPERTY IDENTIFICATION
  - AREAS PREVIOUSLY REMEDIATED BY FMC

- NOTES:
1. BASEMAP OBTAINED FROM A FIGURE BY CONESTOGA-ROVERS AND ASSOCIATES TITLED "2003/2004 PROPOSED SAMPLING LOCATIONS" DATED OCTOBER 2003 AT A SCALE OF 1"=200' AND ADDITIONAL SURVEY INFORMATION PROVIDED BY MCINTOSH AND MCINTOSH, INC. SURVEYORS.
  2. ALL LOCATIONS AND PROPERTY BOUNDARIES SHOWN ARE APPROXIMATE AND SUBJECT TO VERIFICATION.
  3. PROPERTY ID IS NOT RELATED TO STREET ADDRESS OR TAX PARCEL.
  4. NFA = NO FURTHER ACTION, SUBJECT TO EVALUATION OF BURIED PIPE AS APPLICABLE.
  5. SB = STATEMENT OF BASIS
  6. SAMPLING LOCATIONS MAY BE ADJUSTED BASED ON SURVEY OF ACTUAL BURIED PIPE LOCATIONS, AND ADDITIONAL SAMPLING LOCATIONS MAY BE PROPOSED BASED ON INITIAL ANALYTICAL RESULTS.

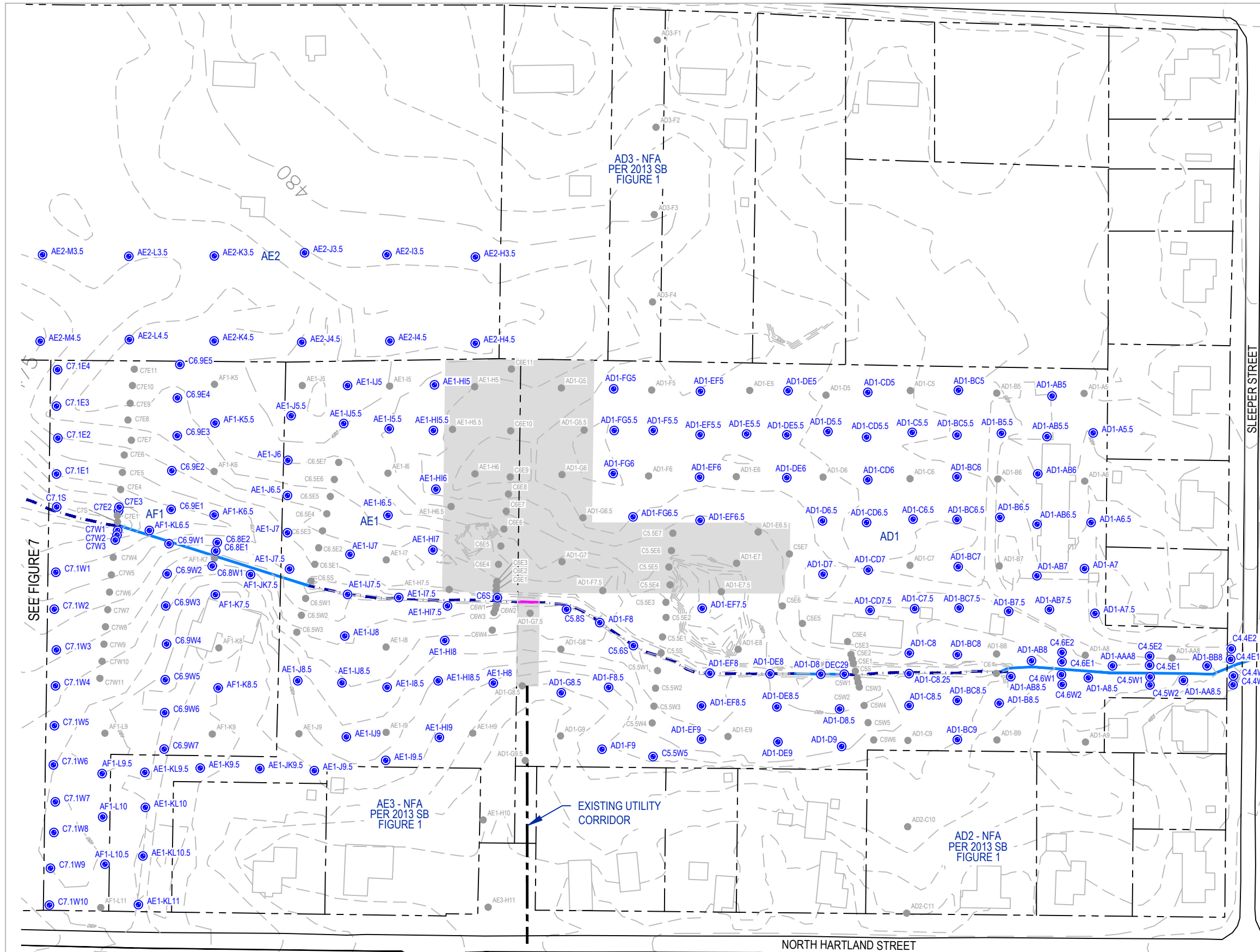


FMC CORPORATION, MIDDLEPORT, NEW YORK  
OU5 NORTH PDI WORK PLAN

Project No. 11190970  
Date February 2020

REACH C1  
PROPOSED SAMPLING LOCATIONS

FIGURE 5

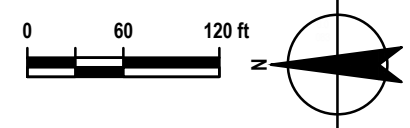


SEE FIGURE 5

- LEGEND:
- APPROXIMATE PROPERTY LINE
  - PRIOR SOIL SAMPLING LOCATION
  - ⊙ PROPOSED SAMPLING LOCATION
  - - - CULVERT 105 (OPEN DITCH PORTION)
  - CULVERT 105 BURIED PIPE
  - CULVERT 105 BURIED PIPE INSTALLED 2011
  - AD1 PROPERTY IDENTIFICATION
  - AREAS PREVIOUSLY REMEDIATED BY FMC

NOTES:

1. BASEMAP OBTAINED FROM A FIGURE BY CONESTOGA-ROVERS AND ASSOCIATES TITLED "2003/2004 PROPOSED SAMPLING LOCATIONS" DATED OCTOBER 2003 AT A SCALE OF 1"=200' AND ADDITIONAL SURVEY INFORMATION PROVIDED BY McINTOSH AND McINTOSH, INC. SURVEYORS.
2. ALL LOCATIONS AND PROPERTY BOUNDARIES SHOWN ARE APPROXIMATE AND SUBJECT TO VERIFICATION.
3. PROPERTY ID IS NOT RELATED TO STREET ADDRESS OR TAX PARCEL.
4. NFA = NO FURTHER ACTION.
5. SB = STATEMENT OF BASIS
6. SAMPLING LOCATIONS MAY BE ADJUSTED BASED ON SURVEY OF ACTUAL BURIED PIPE LOCATIONS, AND ADDITIONAL SAMPLING LOCATIONS MAYBE PROPOSED BASED ON INITIAL ANALYTICAL RESULTS.

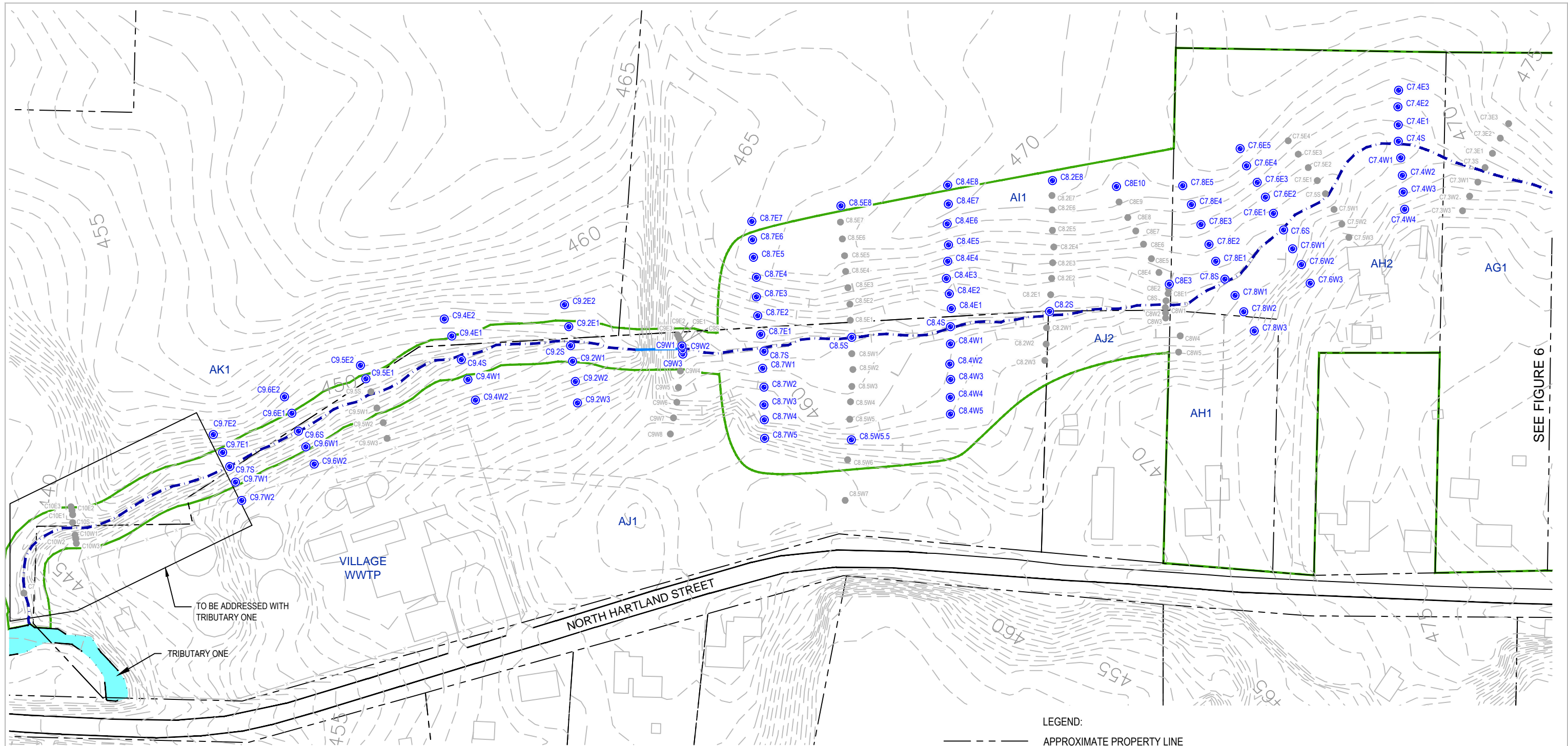


FMC CORPORATION, MIDDLEPORT, NEW YORK  
OU5 NORTH PDI WORK PLAN

Project No. 11190970  
Date November 2019

REACH C2  
PROPOSED SAMPLING LOCATIONS

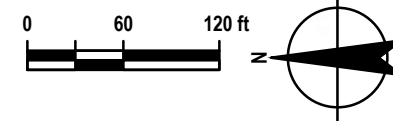
FIGURE 6



NOTES:

1. BASEMAP OBTAINED FROM A FIGURE BY CONESTOGA-ROVERS AND ASSOCIATES TITLED "2003/2004 PROPOSED SAMPLING LOCATIONS" DATED OCTOBER 2003 AT A SCALE OF 1"=200' AND ADDITIONAL SURVEY INFORMATION PROVIDED BY McINTOSH AND McINTOSH, INC. SURVEYORS.
2. ALL LOCATIONS AND PROPERTY BOUNDARIES SHOWN ARE APPROXIMATE AND SUBJECT TO VERIFICATION.
3. PROPERTY ID IS NOT RELATED TO STREET ADDRESS OR TAX PARCEL.
4. ADDITIONAL SAMPLING LOCATIONS MAY BE PROPOSED BASED ON INITIAL ANALYTICAL RESULTS.

- LEGEND:
- APPROXIMATE PROPERTY LINE
  - PRIOR SOIL SAMPLING LOCATION
  - ⊙ PROPOSED SAMPLING LOCATION
  - - - - - CULVERT 105 (OPEN DITCH PORTION)
  - CULVERT 105 BURIED PIPE
  - CMS LIMITS
  - AH2 PROPERTY IDENTIFICATION



FMC CORPORATION, MIDDLEPORT NEW YORK  
OU5 NORTH PDI WORK PLAN

REACH C3  
PROPOSED SAMPLING LOCATIONS

Project No. 11190970  
Date February 2020

FIGURE 7

**Proposed Soil Sample Depth Intervals - Reach C1**  
**OU5 North Pre-Design Work Plan**  
**FMC Corporation - Middleport, New York**

Proposed Location	Northing	Easting	Proposed Sample Depth (Inches bgs)										
			0-3	3-6	6-12	12-18	18-24	24-30	30-36	36-42	42-48	48-54	54-60
<b>Property AB1</b>													
AB1-1	1171409.5437	1177113.0228	X	X	X	X	X						
AB1-2	1171465.8419	1177109.8053	X	X	X	X	X						
AB1-3	1171464.3485	1177074.4860	X	X	X	X	X						
AB1-4	1171450.5137	1176993.9116	X	X	X	X	X						
AB1-5	1171460.3660	1176966.0407	X	X	X	X	X						
AB1-6	1171434.1921	1176949.9529	X	X	X	X	X						
AB1-7	1171446.2828	1176922.4606	X	X	X	X	X						
AB1-8	1171416.8130	1176924.1472	X	X	X	X	X	X	X	X	X	X	X
C2.4E1	1171438.7197	1176900.5319	X	X	X	X	X	X	X	X	X	X	X
C2.4E2	1171442.9732	1176903.3620	X	X	X	X	X	X	X	X	X	X	X
C2.4W1	1171430.8696	1176894.3370	X	X	X	X	X	X	X	X	X	X	X
C2.4W2	1171426.9446	1176891.2395	X	X	X	X	X	X	X	X	X	X	X
<b>Property AB2</b>													
AB2-1	1171292.9611	1176976.7715	X	X	X	X	X	X	X	X	X	X	X
AB2-2	1171287.4349	1176966.7014	X	X	X	X	X	X	X	X	X	X	X
AB2-3	1171313.1154	1176974.1727	X	X	X	X	X	X	X	X	X	X	X
AB2-4	1171346.9228	1176974.8224	X	X	X	X	X	X	X	X	X	X	X
AB2-5	1171393.6339	1176950.0896	X	X	X	X	X	X	X	X	X	X	X
AB2-6	1171366.2223	1176944.8624	X	X	X	X	X						
AB2-7	1171329.4465	1176944.0039	X	X	X	X	X						
AB2-8	1171379.9573	1176883.9050	X	X	X	X	X						
AB2-9	1171380.5756	1176908.9620	X	X	X	X	X						
AB2-10	1171357.7029	1176918.5670	X	X	X	X	X						
C2.3E1	1171380.4830	1176984.1778	X	X	X	X	X	X	X	X	X	X	X
C2.3W1	1171378.8244	1176974.3163	X	X	X	X	X	X	X	X	X	X	X
C2.3W2	1171377.9951	1176969.3856	X	X	X	X	X	X	X	X	X	X	X
<b>Property AB3</b>													
AB3-1	1171402.3264	1176992.2639	X	X	X	X	X						
AB3-2	1171358.1487	1177006.7143	X	X	X	X	X						
<b>Property AB4</b>													
AB4-2	1171314.8885	1177081.5817	X	X	X	X	X						
<b>Property AB5</b>													
AB5-1	1171202.8110	1177122.5105	X	X	X	X	X	X	X	X	X	X	X
AB5-2	1171233.6358	1177109.0751	X	X	X	X	X	X	X	X	X	X	X
C1.3E1	1171170.0187	1177120.8720	X	X	X	X	X	X	X	X	X	X	X
C1.3W1	1171169.3628	1177110.7136	X	X	X	X	X	X	X	X	X	X	X
C1.3W2	1171169.3628	1177102.1936	X	X	X	X	X	X	X	X	X	X	X
C1.7E1	1171267.0840	1177119.8889	X	X	X	X	X	X	X	X	X	X	X
C1.7W1	1171266.4281	1177108.7474	X	X	X	X	X	X	X	X	X	X	X
C1.7W2	1171265.7723	1177101.8659	X	X	X	X	X	X	X	X	X	X	X
<b>Property AB7</b>													
AB7-1	1171240.7721	1176977.7767	X	X	X	X	X						
AB7-2	1171267.0775	1176953.3215	X	X	X	X	X						
AB7-3	1171231.6220	1176925.7345	X	X	X	X	X						
AB7-4	1171275.7323	1176978.3957	X	X	X	X	X						
<b>Property AC1</b>													
AC1-1	1171990.1406	1176530.8873	X	X	X	X	X	X	X	X	X	X	X
AC1-2	1171990.9875	1176501.7024	X	X	X	X	X	X	X	X	X	X	X
AC1-3	1171990.3862	1176424.5411	X	X	X	X	X	X	X	X	X	X	X
C4.1E1	1171998.6052	1176586.7193	X	X	X	X	X	X	X	X	X	X	X
C4.1W1	1171990.1402	1176564.3018	X	X	X	X	X	X	X	X	X	X	X
C4.2E1	1172001.1464	1176466.1731	X	X	X	X	X	X	X	X	X	X	X
C4.3W1	1172010.8708	1176384.3534	X	X	X	X	X	X	X	X	X	X	X
C4.3W2	1172010.8715	1176371.3616	X	X	X	X	X	X	X	X	X	X	X
<b>Property AC4</b>													
AC4-1	1171728.7274	1176821.6955	X	X	X	X	X	X	X	X	X	X	X
AC4-2	1171759.6333	1176819.2046	X	X	X	X	X	X	X	X	X	X	X
C2.7E1	1171697.7919	1176845.9954	X	X	X	X	X	X	X	X	X	X	X
C2.7E2	1171700.1955	1176850.5037	X	X	X	X	X	X	X	X	X	X	X
C2.8E1	1171788.3585	1176806.7603	X	X	X	X	X	X	X	X	X	X	X
C2.8E2	1171790.7621	1176811.2686	X	X	X	X	X	X	X	X	X	X	X
C2.8W1	1171784.3833	1176797.5844	X	X	X	X	X	X	X	X	X	X	X
C2.8W2	1171782.3957	1176792.9964	X	X	X	X	X	X	X	X	X	X	X

**Proposed Soil Sample Depth Intervals - Reach C1  
OU5 North Pre-Design Work Plan  
FMC Corporation - Middleport, New York**

Proposed Location	Northing	Easting	Proposed Sample Depth (Inches bgs)										
			0-3	3-6	6-12	12-18	18-24	24-30	30-36	36-42	42-48	48-54	54-60
<b>Property AC5</b>													
AC5-1	1171472.3961	1176872.7847	X	X	X	X	X	X	X	X	X	X	X
AC5-2	1171530.5089	1176894.1095	X	X	X	X	X	X	X	X	X	X	X
AC5-3	1171560.3061	1176911.5797	X	X	X	X	X	X	X	X	X	X	X
AC5-4	1171632.8091	1176857.7910	X	X	X	X	X	X	X	X	X	X	X
AC5-5	1171663.1272	1176861.0127	X	X	X	X	X	X	X	X	X	X	X
C2.5W1	1171496.0917	1176878.3082	X	X	X	X	X	X	X	X	X	X	X
C2.5W2	1171499.0094	1176872.0882	X	X	X	X	X	X	X	X	X	X	X
C2.6E1	1171594.6133	1176882.9088	X	X	X	X	X	X	X	X	X	X	X
C2.6E2	1171597.0169	1176887.4171	X	X	X	X	X	X	X	X	X	X	X
C2.6W1	1171590.6381	1176873.7328	X	X	X	X	X	X	X	X	X	X	X
C2.6W2	1171588.6505	1176869.1449	X	X	X	X	X	X	X	X	X	X	X
C2.7W1	1171693.8167	1176836.8194	X	X	X	X	X	X	X	X	X	X	X
C2.7W2	1171691.8291	1176832.2315	X	X	X	X	X	X	X	X	X	X	X

## Notes:

- <sup>(1)</sup> Sample intervals may be extended deeper (6-inch increments) if needed based on actual pipe depth as determined by survey to be completed.

**Proposed Soil Sample Depth Intervals - Reach C2  
OU5 North Pre-Design Work Plan  
FMC Corporation - Middleport, New York**

Proposed Location	Northing	Easting	Proposed Sample Depth (Inches bgs)											
			0-3	3-6	6-12	12-18	18-24	24-30	30-36	36-42	42-48	48-54	54-60	
<b>Property AD1</b>														
AD1-A5.5	1172191.6570	1176645.2070	X	X	X	X	X							
AD1-A6.5	1172194.0610	1176542.3680	X	X	X	X	X							
AD1-A7	1172201.5700	1176489.4700	Previously Sampled						X	X				
AD1-A7.5	1172189.5620	1176438.0750	X	X	X	X	X							
AD1-A8.5	1172197.2230	1176363.9130	X	X	X	X	X	X	X	X	X	X	X	
AD1-AA8.5	1172088.0560	1176361.0420	X	X	X	X	X	X	X	X	X	X	X	
AD1-AAA8	1172169.4520	1176377.7880	X	X	X	X	X	X	X	X	X	X	X	
AD1-AB5	1172238.7840	1176687.4960	X	X	X	X	X							
AD1-AB5.5	1172244.5550	1176640.8820	X	X	X	X	X							
AD1-AB6	1172255.1350	1176598.1130	X	X	X	X	X							
AD1-AB6.5	1172256.0970	1176540.4460	X	X	X	X	X							
AD1-AB7	1172256.1150	1176481.1360	X	X	X	X	X							
AD1-AB7.5	1172241.7510	1176442.3810	X	X	X	X	X							
AD1-AB8	1172262.3390	1176383.5300	X	X	X	X	X	X	X	X	X	X	X	
AD1-AB8.5	1172286.2790	1176365.3480	X	X	X	X	X	X	X	X	X	X	X	
AD1-B5.5	1172296.9730	1176644.7270	X	X	X	X	X							
AD1-B6.5	1172298.8960	1176548.1350	X	X	X	X	X							
AD1-B7.5	1172288.6730	1176440.4670	X	X	X	X	X							
AD1-B8.5	1172299.6860	1176334.7270	X	X	X	X	X							
AD1-BB8	1172060.7650	1176377.7880	X	X	X	X	X	X	X	X	X	X	X	
AD1-BC5	1172346.5050	1176694.2240	X	X	X	X	X							
AD1-BC5.5	1172347.9480	1176642.8040	X	X	X	X	X							
AD1-BC6	1172347.9480	1176594.7490	X	X	X	X	X							
AD1-BC6.5	1172347.9480	1176545.7320	X	X	X	X	X							
AD1-BC7	1172346.6080	1176491.6620	X	X	X	X	X							
AD1-BC7.5	1172345.6500	1176444.2950	X	X	X	X	X							
AD1-BC8	1172347.5650	1176390.7070	X	X	X	X	X							
AD1-BC8.5	1172347.5650	1176338.0760	X	X	X	X	X							
AD1-BC9	1172347.5650	1176293.1010	X	X	X	X	X							
AD1-C5.5	1172399.4040	1176645.6880	X	X	X	X	X							
AD1-C6.5	1172398.4420	1176546.2130	X	X	X	X	X							
AD1-C7.5	1172396.5200	1176443.4640	X	X	X	X	X							
AD1-C8	1172402.7910	1176392.4330	Previously Sampled						X	X				
AD1-C8.25	1172403.0900	1176368.8570	X	X	X	X	X							
AD1-C8.5	1172403.0900	1176332.1500	X	X	X	X	X							
AD1-CD5	1172450.3780	1176691.8210	X	X	X	X	X							
AD1-CD5.5	1172451.8210	1176640.4020	X	X	X	X	X							
AD1-CD6	1172450.3780	1176591.3850	X	X	X	X	X							
AD1-CD6.5	1172451.8210	1176542.3680	X	X	X	X	X							
AD1-CD7	1172450.0280	1176487.8350	X	X	X	X	X							
AD1-CD7.5	1172447.8860	1176441.3750	X	X	X	X	X							
AD1-D5.5	1172496.1760	1176646.7150	X	X	X	X	X							
AD1-D6.5	1172502.3790	1176544.2850	X	X	X	X	X							
AD1-D7	1172501.7390	1176483.0500	X	X	X	X	X							
AD1-D8	1172504.3290	1176368.2600	X	X	X	X	X							
AD1-D8.5	1172482.8270	1176328.2700	X	X	X	X	X							
AD1-D9	1172480.4380	1176285.2960	X	X	X	X	X							
AD1-DE5	1172541.9630	1176693.6500	X	X	X	X	X							
AD1-DE5.5	1172543.4400	1176642.8780	X	X	X	X	X							
AD1-DE6	1172543.4400	1176593.8770	X	X	X	X	X							
AD1-DE8	1172562.5640	1176368.5580	X	X	X	X	X							
AD1-DE8.5	1172554.7990	1176330.6580	X	X	X	X	X							
AD1-DE9	1172553.6050	1176290.3700	X	X	X	X	X							
AD1-E5.5	1172589.5210	1176644.0590	X	X	X	X	X							
AD1-EF5	1172642.6930	1176693.0600	X	X	X	X	X							
AD1-EF5.5	1172642.9880	1176643.1730	X	X	X	X	X							
AD1-EF6	1172643.5790	1176594.4670	X	X	X	X	X							
AD1-EF6.5	1172642.9880	1176544.8750	X	X	X	X	X							
AD1-EF7.5	1172640.6840	1176443.8030	X	X	X	X	X							
AD1-EF8	1172631.7430	1176369.1610	X	X	X	X	X							
AD1-EF8.5	1172641.4050	1176331.8520	X	X	X	X	X							



**Proposed Soil Sample Depth Intervals - Reach C2  
OU5 North Pre-Design Work Plan  
FMC Corporation - Middleport, New York**

Proposed Location	Northing	Easting	Proposed Sample Depth (Inches bgs)										
			0-3	3-6	6-12	12-18	18-24	24-30	30-36	36-42	42-48	48-54	54-60
<b>Property AD1</b>													
AD1-EF9	1172641.4050	1176293.6530	X	X	X	X	X						
AD1-F5.5	1172696.7500	1176647.8960	X	X	X	X	X						
AD1-F8	1172758.2370	1176427.3160	X	X	X	X	X						
AD1-F8.5	1172747.9880	1176352.9900	X	X	X	X	X						
AD1-F9	1172755.6320	1176282.0800	X	X	X	X	X						
AD1-FG5	1172742.2420	1176695.7170	X	X	X	X	X						
AD1-FG5.5	1172741.6510	1176647.8960	X	X	X	X	X						
AD1-FG6	1172742.8320	1176598.6000	X	X	X	X	X						
AD1-FG6.5	1172720.0870	1176548.7130	X	X	X	X	X						
AD1-G8.5	1172802.4540	1176346.8450	X	X	X	X	X						
C4.4E1	1172033.8230	1176385.2590	X	X	X	X	X		X		X	X	X
C4.4E2	1172033.0670	1176397.1660	X	X	X	X	X		X	X	X	X	X
C4.4W1	1172030.6080	1176366.1690	X	X	X	X	X		X	X	X	X	X
C4.4W2	1172030.9860	1176355.9630	X	X	X	X	X		X	X	X	X	X
C4.5E1	1172126.8800	1176378.4540	X	X	X	X	X		X	X	X	X	X
C4.5E2	1172126.8800	1176388.8500	X	X	X	X	X		X	X	X	X	X
C4.5W1	1172126.1240	1176365.0350	X	X	X	X	X		X	X	X	X	X
C4.5W2	1172126.3130	1176355.7740	X	X	X	X	X		X	X	X	X	X
C4.6E1	1172227.5030	1176382.4240	X	X	X	X	X		X	X	X	X	X
C4.6E2	1172227.3140	1176393.1970	X	X	X	X	X		X	X	X	X	X
C4.6W1	1172228.0710	1176367.6810	X	X	X	X	X		X	X	X	X	X
C4.6W2	1172227.1250	1176356.3410	X	X	X	X	X		X	X	X	X	X
C5.5W5	1172697.0067	1176273.6612	X	X	X	X	X						
C5.6S	1172719.6040	1176401.0790	X	X	X	X	X						
C5.8S	1172796.4170	1176442.6930	X	X	X	X	X						
DEC29	1172477.3530	1176368.1300	Previously Sampled		X	X							
<b>Property AE1</b>													
AE1-H8	1172880.3460	1176357.9650	X	X	X	X	X						
AE1-H9.5	1172874.1580	1176254.7470	X	X	X	X	X						
AE1-HI5	1172948.1120	1176700.3530	X	X	X	X	X						
AE1-HI5.5	1172949.2780	1176647.9110	X	X	X	X	X						
AE1-HI6	1172946.3620	1176580.6100	X	X	X	X	X						
AE1-HI7	1172949.7460	1176510.7130	X	X	X	X	X						
AE1-HI7.5	1172933.0550	1176446.6290	X	X	X	X	X						
AE1-HI8	1172936.2760	1176406.8320	X	X	X	X	X						
AE1-HI8.5	1172943.8900	1176360.5980	X	X	X	X	X						
AE1-HI9	1172942.3910	1176295.5990	X	X	X	X	X						
AE1-I5.5	1173000.0080	1176649.9500	X	X	X	X	X						
AE1-I6.5	1173001.4650	1176550.6020	X	X	X	X	X						
AE1-I7.5	1172988.9850	1176456.2850	X	X	X	X	X						
AE1-I8.5	1173002.4550	1176353.2830	X	X	X	X	X						
AE1-I9.5	1173003.9726	1176269.1453	X	X	X	X	X						
AE1-IJ5	1173047.8220	1176699.4790	X	X	X	X	X						
AE1-IJ5.5	1173052.1950	1176656.0690	X	X	X	X	X						
AE1-IJ7	1173044.9150	1176505.7380	X	X	X	X	X						
AE1-IJ7.5	1173047.8430	1176459.7970	X	X	X	X	X						
AE1-IJ8	1173051.0640	1176412.0990	X	X	X	X	X						
AE1-IJ8.5	1173054.2860	1176358.2570	X	X	X	X	X						
AE1-IJ9	1173049.1530	1176296.1870	X	X	X	X	X						
AE1-J5.5	1173112.5720	1176664.9770	X	X	X	X	X						
AE1-J6	1173116.3410	1176613.6820	X	X	X	X	X						
AE1-J6.5	1173116.7960	1176573.3700	X	X	X	X	X						
AE1-J7	1173116.7960	1176530.4950	X	X	X	X	X						
AE1-J7.5	1173114.4890	1176489.0030	X	X	X	X	X	X	X	X	X	X	X
AE1-J8.5	1173104.9450	1176360.5980	X	X	X	X	X						
AE1-J9.5	1173085.9660	1176257.4940	X	X	X	X	X						
AE1-JK9.5	1173148.6050	1176259.7360	X	X	X	X	X						
<b>Property AE1</b>													
AE1-K9.5	1173217.0910	1176260.3750	X	X	X	X	X						
AE1-KL10	1173279.9680	1176215.2930	X	X	X	X	X						
AE1-KL10.5	1173282.8740	1176159.4260	X	X	X	X	X						
AE1-KL11	1173288.0560	1176103.6880	X	X	X	X	X						
AE1-KL9.5	1173280.6510	1176255.3760	X	X	X	X	X						
C6S	1172875.7210	1176456.0600	Previously Sampled				X	X					

**Proposed Soil Sample Depth Intervals - Reach C2  
OU5 North Pre-Design Work Plan  
FMC Corporation - Middleport, New York**

Proposed Location	Northing	Easting	Proposed Sample Depth (Inches bgs)											
			0-3	3-6	6-12	12-18	18-24	24-30	30-36	36-42	42-48	48-54	54-60	
<b>Property AE2</b>														
AE2-H3.5	1172901.0049	1176847.0683	X	X	X	X	X							
AE2-H4.5	1172901.2952	1176748.1528	X	X	X	X	X							
AE2-I3.5	1173002.6028	1176849.6789	X	X	X	X	X							
AE2-I4.5	1172999.1194	1176750.7634	X	X	X	X	X							
AE2-J3.5	1173097.2340	1176851.9995	X	X	X	X	X							
AE2-J4.5	1173100.4270	1176749.3131	X	X	X	X	X							
AE2-K3.5	1173200.9111	1176848.3953	X	X	X	X	X							
AE2-K4.5	1173201.0775	1176750.8328	X	X	X	X	X							
AE2-L3.5	1173298.9807	1176848.0389	X	X	X	X	X							
AE2-L4.5	1173298.4339	1176752.4365	X	X	X	X	X							
AE2-M3.5	1173398.0351	1176849.7376	X	X	X	X	X							
AE2-M4.5	1173400.7692	1176750.4921	X	X	X	X	X							
<b>Property AF1</b>														
AF1-JK7.5	1173159.1188	1176482.5118	X	X	X	X	X	X	X	X	X	X	X	
AF1-K5.5	1173199.9790	1176656.5480	X	X	X	X	X							
AF1-K6.5	1173201.0330	1176550.9290	X	X	X	X	X							
AF1-K7.5	1173199.5170	1176459.5170	X	X	X	X	X							
AF1-K8.5	1173196.4570	1176352.3130	X	X	X	X	X							
AF1-KL6.5	1173275.5019	1176533.1112	X	X	X	X	X	X	X	X	X	X	X	
AF1-L10	1173328.9550	1176204.2060	Previously Sampled						X	X				
AF1-L10.5	1173326.3990	1176150.0450	X	X	X	X	X							
AF1-L9.5	1173329.6380	1176254.0110	X	X	X	X	X							
C6.8E1	1173199.1367	1176509.6401	X	X	X	X	X	X	X	X	X	X	X	
C6.8E2	1173197.4711	1176519.2953	X	X	X	X	X	X	X	X	X	X	X	
C6.8W2	1173203.1345	1176492.3270	X	X	X	X	X	X	X	X	X	X	X	
C6.9E1	1173250.4260	1176557.4140	X	X	X	X	X							
C6.9E2	1173249.5160	1176601.8450	X	X	X	X	X							
C6.9E3	1173243.4130	1176642.0200	X	X	X	X	X							
C6.9E4	1173243.2340	1176685.4240	X	X	X	X	X							
C6.9E5	1173240.3620	1176723.8050	X	X	X	X	X							
C6.9W1	1173252.7700	1176517.9640	X	X	X	X	X	X	X	X	X	X	X	
C6.9W2	1173255.0470	1176483.3490	X	X	X	X	X							
C6.9W3	1173256.6140	1176446.6450	X	X	X	X	X							
C6.9W4	1173255.5690	1176402.8090	X	X	X	X	X							
C6.9W5	1173257.1180	1176361.8390	X	X	X	X	X							
C6.9W6	1173257.8110	1176324.0830	X	X	X	X	X							
C6.9W7	1173258.4060	1176282.1320	X	X	X	X	X							
C7.1E1	1173382.0510	1176597.9050	X	X	X	X	X							
C7.1E2	1173380.4740	1176639.2280	X	X	X	X	X							
C7.1E3	1173381.9940	1176675.9640	X	X	X	X	X							
C7.1E4	1173380.8010	1176717.7060	X	X	X	X	X							
C7.1S	1173381.8010	1176560.1920	X	X	X	X	X							
C7.1W1	1173382.8180	1176485.2620	X	X	X	X	X							
C7.1W10	1173390.2390	1176102.9760	X	X	X	X	X							
C7.1W2	1173384.5590	1176442.8180	X	X	X	X	X							
C7.1W3	1173382.1220	1176396.0250	X	X	X	X	X							
C7.1W4	1173383.1190	1176354.9110	X	X	X	X	X							
C7.1W5	1173384.5050	1176309.0150	X	X	X	X	X							
C7.1W6	1173385.6230	1176264.0750	X	X	X	X	X							
<b>Property AF1</b>														
C7.1W7	1173383.3820	1176221.6590	X	X	X	X	X							
C7.1W8	1173385.1110	1176186.4670	X	X	X	X	X							
C7.1W9	1173389.0410	1176145.4400	X	X	X	X	X							
C7E2	1173310.8760	1176555.5180	Previously Sampled				X	X						
C7E3	1173310.1450	1176560.0800	Previously Sampled				X	X						
C7W1	1173311.7170	1176533.1600	Previously Sampled				X	X						
C7W2	1173312.5350	1176527.8420	Previously Sampled				X	X						
C7W3	1173314.6320	1176522.1080	Previously Sampled				X	X						

Notes:

(1) Sample intervals may be extended deeper (6-inch increments) if needed based on actual pipe depth as determined by survey to be completed.

**Proposed Soil Sample Depth Intervals - Reach C3  
OU5 North Pre-Design Work Plan  
FMC Corporation - Middleport, New York**

Proposed Location	Northing	Easting	Proposed Sample Depth (Inches bgs)				
			0-3	3-6	6-12	12-18	18-24
<b>Property AH2</b>							
C7.4E1	1173578.9703	1176640.9790	X	X	X	X	X
C7.4E2	1173579.4870	1176662.9237	X	X	X	X	X
C7.4E3	1173578.7119	1176683.0611	X	X	X	X	X
C7.4S	1173578.9703	1176620.8415	X	X	X	X	X
C7.4W1	1173576.1284	1176600.7041	X	X	X	X	X
C7.4W2	1173574.0615	1176579.2758	X	X	X	X	X
C7.4W3	1173573.0281	1176558.8801	X	X	X	X	X
C7.4W4	1173571.2196	1176537.9681	X	X	X	X	X
C7.6E1	1173731.2272	1176532.9371	X	X	X	X	X
C7.6E2	1173741.1033	1176552.6754	X	X	X	X	X
C7.6E3	1173750.9795	1176570.7688	X	X	X	X	X
C7.6E4	1173764.1476	1176590.9184	X	X	X	X	X
C7.6E5	1173771.9662	1176611.8903	X	X	X	X	X
C7.6S	1173718.8821	1176512.7875	X	X	X	X	X
C7.6W1	1173707.7714	1176489.7595	X	X	X	X	X
C7.6W2	1173697.0723	1176470.4324	X	X	X	X	X
C7.6W3	1173686.3731	1176447.8156	X	X	X	X	X
C7.8E1	1173801.5946	1176474.5446	X	X	X	X	X
C7.8E2	1173809.8247	1176495.1053	X	X	X	X	X
C7.8E3	1173819.7008	1176519.3670	X	X	X	X	X
C7.8E4	1173831.2230	1176543.6287	X	X	X	X	X
C7.8E5	1173841.9221	1176566.6567	X	X	X	X	X
C7.8S	1173790.4840	1176452.7502	X	X	X	X	X
C7.8W1	1173778.1388	1176433.0119	X	X	X	X	X
C7.8W2	1173767.4397	1176412.8623	X	X	X	X	X
C7.8W3	1173754.6830	1176389.4231	X	X	X	X	X
<b>Property AI1</b>							
C8.2E8	1174000.7610	1176572.8163	X	X	X	X	X
C8.4E1	1174124.0956	1176416.8218	X	X	X	X	X
C8.4E2	1174126.3699	1176434.8763	X	X	X	X	X
C8.4E3	1174130.1532	1176453.5276	X	X	X	X	X
C8.4E4	1174128.3877	1176474.4472	X	X	X	X	X
C8.4E5	1174127.3788	1176494.6106	X	X	X	X	X
C8.4E6	1174129.1444	1176520.0670	X	X	X	X	X
C8.4E7	1174127.6283	1176544.3354	X	X	X	X	X
C8.4E8	1174128.3850	1176567.2713	X	X	X	X	X
C8.5E8	1174258.5795	1176542.0546	X	X	X	X	X
C8.7E2	1174360.0972	1176408.0558	X	X	X	X	X
C8.7E3	1174361.6902	1176431.1375	X	X	X	X	X
C8.7E4	1174361.6902	1176455.0151	X	X	X	X	X
C8.7E5	1174365.2743	1176479.2906	X	X	X	X	X
C8.7E6	1174366.4691	1176500.7805	X	X	X	X	X
C8.7E7	1174367.3286	1176523.0244	X	X	X	X	X
C8E10	1173922.6048	1176565.6381	X	X	X	X	X
C8E3	1173858.1818	1176446.4278	Previously Sampled			X	X
<b>Property AJ1</b>							
C8.4S	1174125.1045	1176394.6419	X	X	X	X	X
C8.4W1	1174125.1045	1176373.7223	X	X	X	X	X
C8.4W2	1174125.8046	1176349.0735	X	X	X	X	X
C8.4W3	1174124.8586	1176330.3250	X	X	X	X	X
C8.4W4	1174125.3316	1176308.5830	X	X	X	X	X
C8.4W5	1174125.0163	1176288.1015	X	X	X	X	X
C8.5S	1174245.3750	1176381.7048	Previously Sampled		X	X	
C8.5W5.5	1174245.8739	1176256.8027	X	X	X	X	X
C8.7E1	1174356.5130	1176385.3721	X	X	X	X	X
C8.7S	1174352.5306	1176364.6782	X	X	X	X	X
C8.7W1	1174354.1236	1176343.9843	X	X	X	X	X
C8.7W2	1174352.5306	1176320.9026	X	X	X	X	X
C8.7W3	1174352.5306	1176299.4128	X	X	X	X	X
C8.7W4	1174352.1324	1176281.1066	X	X	X	X	X

**Proposed Soil Sample Depth Intervals - Reach C3  
OU5 North Pre-Design Work Plan  
FMC Corporation - Middleport, New York**

Proposed Location	Northing	Easting	Proposed Sample Depth (Inches bgs)				
			0-3	3-6	6-12	12-18	18-24
<b>Property AJ1</b>							
C8.7W5	1174351.7341	1176258.4229	X	X	X	X	X
C9.2S	1174588.3114	1176371.5222	X	X	X	X	X
C9.2W1	1174585.8437	1176352.5342	X	X	X	X	X
C9.2W2	1174582.3889	1176327.8745	X	X	X	X	X
C9.2W3	1174579.9211	1176301.7351	X	X	X	X	X
C9.4S	1174721.5681	1176354.5070	X	X	X	X	X
C9.4W1	1174713.4246	1176330.3404	X	X	X	X	X
C9.4W2	1174704.2941	1176305.1875	X	X	X	X	X
C9.6S	1174920.0713	1176267.2599	X	X	X	X	X
C9.6W1	1174911.0003	1176248.1509	X	X	X	X	X
C9.6W2	1174900.9488	1176227.0820	X	X	X	X	X
C9.7W1	1174996.8063	1176205.0332	X	X	X	X	X
C9.7W2	1174989.2064	1176182.7394	X	X	X	X	X
C9W1	1174452.4320	1176371.0600	Previously Sampled			X	X
C9W2	1174451.7013	1176366.5992	Previously Sampled			X	X
C9W3	1174451.4268	1176361.3197	Previously Sampled			X	X
<b>Property AJ2</b>							
C8.2S	1174004.1793	1176413.3622	Previously Sampled		X	X	
<b>Property AK1</b>							
C9.2E1	1174590.5323	1176394.7024	X	X	X	X	X
C9.2E2	1174595.7145	1176421.5816	X	X	X	X	X
C9.4E1	1174733.1664	1176383.3589	X	X	X	X	X
C9.4E2	1174742.2969	1176404.0731	X	X	X	X	X
C9.5E1	1174837.8687	1176331.0912	X	X	X	X	X
C9.5E2	1174844.4881	1176347.5053	X	X	X	X	X
C9.6E1	1174928.1615	1176289.0637	X	X	X	X	X
C9.6E2	1174936.9873	1176309.1526	X	X	X	X	X
C9.7E1	1175012.4966	1176241.2913	X	X	X	X	X
C9.7E2	1175023.7739	1176263.0951	X	X	X	X	X
C9.7S	1175003.9160	1176224.1422	X	X	X	X	X