

Appendix H

Extent of Remediation
for Each Corrective
Measures Alternative

Appendix H

Extent of Remediation for Each Corrective Measures Alternative

I. Purpose

This appendix presents the following information for each Corrective Measures Alternative (CMA) for the Suspected Air Deposition and Culvert 105 Study Areas:

- Post-remediation soil arsenic concentration goals for CMAs 1 through 8 (Table H-1)
- Extent of remediation on a property-specific basis, including identification of the individual properties to be remediated, the estimated post-remediation soil arsenic concentrations, and the estimated soil volumes to be remediated (Table H-2; Figures H-2 through H-8d)
- Comparison as requested by the Agencies of data averaging methods for eight large properties under CMA 8 to identify the difference in soil volumes under the property-wide and the grid sub-area methods (Table H-3; Figures H-9a through H-9e)
- Extent of the remediation for both study areas broken down by property usage (as defined in Appendix C), including a summary of the post-remediation soil arsenic concentrations by property usage type (overall summary for the properties to be remediated) (Table H-4)
- Extent of the remediation for both study areas, including the estimated number of properties to be remediated, estimated area and volume of soil to be remediated, and estimated length of Culvert 105 buried pipe to be remediated (Table H-5)

The information provided in this appendix has been compiled to support development of the Draft CMS Report. Design remediation limits and soil volumes are estimates based on available data. The actual design limits and volumes of soil expected to be remediated will be determined during the remedial design activities of the Corrective Measures Implementation (CMI), which will occur after selection of the final corrective measure(s) by the Agencies.

II. Extent of Remediation on a Property-Specific Basis

Properties that were evaluated for possible remediation as part of CMAs 1 through 8 are listed in Table H-2. For CMA 1 (no further action), no additional properties (beyond those already remediated in previous programs – i.e., ICMs and IRMs shown on Figure H-1) would be remediated and in the column entitled “To be Remediated?” all entries are “no”. For CMAs 2 through 8, the properties to be remediated are indicated as “yes” while those that are not to be remediated are indicated as “no”.

Eighteen properties within the study area have not been sampled because access permission could not be obtained from the property owner. With agreement by the Agencies, these eighteen CMS properties (i.e., B8, F7, F11, F12, G5, G8, I15, I19, L2, M4, N15, N16, P10, S26, T5, R1a-b, AC5 and AE2) were not evaluated for remediation under the CMAs, with the exception of three properties located along the Culvert 105 buried pipe (i.e., B8, M4 and AC5). Properties B8, M4 and AC5 were included under CMA 8, which as described below provides for removal and replacement of all buried sections of the culvert (with exceptions noted). FMC will offer to perform soil sampling and analysis at the eighteen un-sampled properties pursuant to a process approved by the Agencies. If written access permission is obtained from the property owner, then the sampling and analysis would be conducted, the results will be compared to the corrective measures goals selected by the Agencies, and if warranted the property will be remediated.

For those properties that are to be remediated, Table H-2 lists for each property the estimated post-remediation maximum soil arsenic concentration, post-remediation average soil arsenic concentration in surface soil (based on samples collected at depths of 0- to 3-inches or 0- to 6-inches below surface grade), the post-remediation average soil arsenic concentration at all depths, and the estimated soil volume to be remediated. For CMA 1, Table H-2 has no estimates of soil volume to be remediated and lists the current soil arsenic concentrations.

The steps followed as part of the property-specific CMA evaluation to identify the post-remediation maximum and average arsenic concentrations and the property-specific remediation volumes are described below.

1. The soil arsenic sample data for properties listed on Table H-2 were evaluated with respect to the property maximum soil remediation goals for CMAs 2 through 8 (Table H-1) to identify properties and associated soil sample points that would be remediated. Each soil sample point with an arsenic concentration greater than the post-remediation maximum concentration goal was identified for remediation. CMA 2 is unique among the CMAs in that the extent of remediation is based strictly on the 20 mg/kg soil arsenic concentration goal applied on a point by point basis, with no averaging. Therefore, the maximum soil remediation goal for CMA 2 is 20 mg/kg. The Agencies have suggested that some limited flexibility in the application of this goal may be employed on a case-by-case basis during the CMI (subject to approval by the Agencies). However, in the estimates presented below, the maximum soil remediation goals were applied at all sample points.
2. As an outcome of Step 1 (above), the maximum depth of remediation at each sample location was identified. Based on the maximum depth of remediation at each sample location, it was determined that there were some locations with shallower sample points, having acceptable concentrations, that are required to be remediated solely for the purpose of accessing deeper soils. At these locations, the shallower sample points were identified for remediation

regardless of the acceptable arsenic concentration at the shallower depth. Under CMA 2, Step 2 was the final step for identification of soil sample points to be remediated; CMAs 3 through 8 had additional steps which are described below.

3. The soil arsenic sample data for properties listed on Table H-2 were evaluated against the property average soil remediation goals for CMAs 3 through 8 in Table H-1 to identify soil sample points requiring remediation to achieve the remediation goals. The property-specific average soil concentrations were evaluated for shallow soil (collectively using data from the 0- to 3-inch and 0- to 6-inch sample depth intervals) and on an overall property-wide basis (all depths). For CMA 8, in addition to the surface and all depths averages on a property-wide basis, averages were also developed for sampling grid sub-areas at eight large properties (R1a-north, R1a-south, R1b, R1d, AD1, AE1, AF1 and the non-ICM area of the Roy-Hart School Property), as requested by the Agencies. An approximate 100-foot by 100-foot grid was established across each of these properties (see Figures H-9a through H-9e), with the grid lines passing through sampling locations to the extent feasible. Grid squares were then combined or adjusted, as necessary, to create data averaging sub-areas with at least four sampling locations within or delineating the sub-area. Averages were developed both property-wide and for the data averaging areas to allow comparison of the soil volumes to be remediated, as estimated by each of these two methods (see Table H-3). This comparison indicates the grid sub-area method results in soil volume estimates approximately 9 percent higher than those under the property-wide method. To account for this difference, a correction factor of 1.09 was applied to the estimates for the eight large properties calculated on a property-wide basis for CMAs 3 through 8.
4. A concentration value of 5 mg/kg was used as an estimate of backfill soil arsenic values, for purposes of calculating the post-remediation average concentrations on remediated properties. This estimated backfill concentration is used for the purposes of this CMS only; the actual post-remediation average concentration will depend on the backfill arsenic concentrations determined from sampling results during the CMI. The soil sample points identified for remediation were replaced with the backfill value of 5 mg/kg for calculation of post-remediation average (both surface soil and all soil at any depth) arsenic concentrations were calculated for each property (and also for grid sub-areas in CMA 8).
5. If the data set for a property allowed more than one possible combination of soil sample points to be remediated to achieve the property-specific post-remediation average concentration goal, then preference was given to the highest concentrations that were either at the ground surface or that were adjacent to another sample point identified for remediation. If two such sample points exhibited similar concentrations, then preference was given to ease of remediation (e.g., access to the street). A detailed analysis of the locations of trees and of proximity to access obstructions (e.g., utilities, structures) at each property was not conducted as part of the CMS,

and it was assumed that non-permanent structures (e.g., sidewalks, driveways, aboveground pools, sheds, etc.) would be removed as necessary for the purposes of this CMS only. During the CMI phase, on properties where the owner wants to preserve a tree or trees, consideration shall be given to remediation of soil associated with data points outside of root zones of the designated trees to achieve the average soil arsenic concentration goals.

6. Figures H-1 through H-8d show the estimated limits of soil to be remediated for each of the respective CMAs, highlighted in a range of colors for differing depths of remediation. The limits (i.e., area and depth), Culvert 105 considerations, and volume of soil to be remediated for CMAs 2 through 8 were determined as described below.
 - a. Area: The area associated with a sample point to be remediated was estimated on a property-specific basis by extending the limits of remediation to either the next adjacent (or closest) sample points on that property that met the post-remediation maximum concentration goal (“point-to-point”), or to the property line if no sample exists in that direction. Where the area identified for remediation encompassed the footprint of a non-permanent structure (e.g., sidewalks, driveways, above-ground pools, sheds, etc.), the area of the non-permanent structure was included in the estimated area of remediation for purposes of the CMS. The need to remove soil beneath a non-permanent structure will be determined on a case-by-case basis during the design phase of the CMI after the Agencies have selected the final corrective measure(s).
 - b. Depth: The vertical extent of soil to be remediated was estimated as the deepest depth of the sample points identified to be remediated at each location. If the vertical extent could not be bounded by the available data at a particular location (i.e., the deepest sample was identified to be remediated), and deeper sample points were available at the next adjacent sample points, then it was assumed that the soil to be remediated extended to an estimated depth dictated by the next adjacent sample points for the purposes of the CMS. The actual depth of soil removal at such points will be determined during the design phase of the CMI after the Agencies have selected the final corrective measure(s), and may include additional soil sampling and analysis.
 - c. Culvert 105 Considerations: For CMAs 2 through 7B, the extent of remediation along the buried pipe sections of Culvert 105 and the estimated length of pipe that would require replacement was determined using the Culvert 105 sampling transect data points. It was assumed that the Culvert 105 pipe would be replaced along with any excavation of soil around the pipe identified for remediation. The extent of remediation along Culvert 105 associated with a transect sampling location identified for remediation was extended both upstream and downstream, to the next closest Culvert 105 sampling transect where the soil levels were below the post-remediation maximum concentration goal. For the purposes of the CMS, the lateral extent of soil remediation with respect to buried Culvert 105 pipe was

estimated at 10 feet (centered at the pipe) and the depth was estimated at 6 feet below surface grade. The estimated area of remediation along Culvert 105 was not extended into prior ICM areas or un-sampled properties/areas.

For CMA 8 only, it was assumed that remediation would be required along the entire length of Culvert 105 buried pipe (including three un-sampled properties and seven public streets crossed by the culvert, but excepting areas remediated under ICMs and the section of the pipe that passes beneath the Erie Canal), regardless of the absence of subsurface data or if existing transect sampling data met the post-remediation maximum concentration goal. Specifically, it was assumed that approximately 2 cubic yards of soil (e.g., approximately 10 feet wide by 6 feet deep) would be remediated for every linear foot of buried pipe.

- d. Estimated Volume: The resulting estimated volume of soil to be remediated was calculated on a property-specific basis using the areas and depths estimated in Steps 6a to 6c above. The estimated volume includes an upward adjustment by thirty percent to account for implementation factors (e.g., additional information obtained during the CMI design phase and the practicability of remediation within the estimated areas and depths identified to be remediated based on property-specific and constructability considerations). The added thirty percent helps derive conservatively estimated CMS remedial soil volumes for each of the CMAs. In addition, the data averaging evaluation for the eight large properties (i.e., R1a-north, R1a-south, R1b, R1d, AD1, AE1, AF1 and the non-ICM area of the Roy-Hart School Property) described in Step 3 yielded a further increase of nine percent in the estimated volume of soil to be remediated using the grid sub-area data averaging method requested by the Agencies as compared to the property-wide average method used by FMC (see Table H-3). Therefore, an additional nine percent was applied to the estimated volume of soil to be remediated at each of the eight large properties as calculated by the property-wide average method under CMAs 3 through 8.

III. Summary

The extent of remediation is summarized in the following tables:

- Table H-4 presents the results of evaluation of the CMAs on a property-usage type basis, including a summary of the post-remediation soil arsenic concentrations by property usage type (overall summary for the properties to be remediated)
- Table H-5 presents the results of the evaluation of the CMAs on a study areas wide-basis, including the number of properties to be remediated, the estimated total area and volume of soil to be remediated, the estimated length of Culvert 105 buried pipe to be replaced and a cross-reference to the figures in this appendix that show the corresponding estimated limits of remediation for each CMA



**DRAFT – May 2011
CMS Report – Suspected
Air Deposition and Culvert
105 Study Areas**

FMC Corporation
Middleport, New York

As stated above, the actual design limits and estimated volumes of soil to be remediated will be determined during the remedial design activities of the CMI, following selection of the final corrective measure(s) by the Agencies.

Tables

- Table H-1 Identification of Corrective Measures Alternatives
- Table H-2 Extent of Remediation on a Property-Specific Basis
- Table H-3 Comparison of Data Averaging Methods for Large Properties Under CMA 8
- Table H-4 Summary of Post-Remediation Soil Arsenic Concentrations By Property Usage Type (at Properties to be Remediated)
- Table H-5 Extent of Remediation on a Study Area-Wide Basis

Figures

- Figure H-1 Alternative 1 – No Further Action
- Figure H-2a Alternative 2 – Areas to be Remediated South of the Canal
- Figure H-2b Alternative 2 – Areas to be Remediated North of the Canal
- Figure H-3a Alternative 3 – Areas to be Remediated South of the Canal
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- Figure H-4a Alternative 4 – Areas to be Remediated South of the Canal
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- Figure H-6a Alternative 6a – Areas to be Remediated South of the Canal
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- Figure H-8a Alternative 8 – Areas to be Remediated South of the Canal
- Figure H-8b Alternative 8 – Areas to be Remediated North of the Canal
- Figure H-8c Alternative 8 – Areas to be Remediated South of the Canal – Using Data Averaging Areas Method
- Figure H-8d Alternative 8 – Areas to be Remediated North of the Canal – Using Data Averaging Areas Method
- Figure H-9a Data Averaging Areas for Properties R1a-North and R1a-South
- Figure H-9b Data Averaging Areas for Property R1b
- Figure H-9c Data Averaging Areas for Roy-Hart School Property Non-ICM Area
- Figure H-9d Data Averaging Areas for Property R1d
- Figure H-9e Data Averaging Areas for Properties AD1, AE1 and AF1

**TABLE H-1
IDENTIFICATION OF CORRECTIVE MEASURES ALTERNATIVES
DRAFT – MAY 2011
CMS REPORT FOR SUSPECTED AIR DEPOSITION AND CULVERT 105 STUDY AREAS
FMC CORPORATION – MIDDLEPORT, NEW YORK**

Alternative	Post-Remediation Soil Arsenic Goals (1)		Non-ICM Area of Roy-Hart School Property
	Property Average	Property Maximum	
1	Not applicable – No Further Action	Not applicable – No Further Action	No Further Action
2	Not applicable – no average value	20 mg/kg	Included
3	20 mg/kg (residential) 30 mg/kg (public/institutional) (2) 40 mg/kg (agricultural, commercial, industrial, railroad, utility) (2)	40 mg/kg (residential) 60 mg/kg (public/institutional) (2) 80 mg/kg (agricultural, commercial, industrial, railroad, utility) (2)	Institutional Controls (3)
4	30 mg/kg	60 mg/kg	No Further Action
5	40 mg/kg	80 mg/kg	No Further Action
6A	20 mg/kg (residential, public, institutional) 30 mg/kg (agricultural, commercial) (2) 40 mg/kg (industrial, railroad, utility) (2)	35 mg/kg (residential, public, institutional) 50 mg/kg (agricultural, commercial) (2) 80 mg/kg (industrial, railroad, utility) (2)	Institutional Controls (3)
6B	20 mg/kg (residential, public, institutional) 30 mg/kg (agricultural, commercial) (2) 40 mg/kg (industrial, railroad, utility) (2)	35 mg/kg (residential, public, institutional) 50 mg/kg (agricultural, commercial) (2) 80 mg/kg (industrial, railroad, utility) (2)	Included
7A	20 mg/kg (residential, public, institutional) 30 mg/kg (agricultural, commercial) (2) 40 mg/kg (industrial, railroad, utility) (2)	30 mg/kg (residential, public, institutional) 50 mg/kg (agricultural, commercial) (2) 80 mg/kg (industrial, railroad, utility) (2)	Institutional Controls (3)
7B	20 mg/kg (residential, public, institutional) 30 mg/kg (agricultural, commercial) (2) 40 mg/kg (industrial, railroad, utility) (2)	30 mg/kg (residential, public, institutional) 50 mg/kg (agricultural, commercial) (2) 80 mg/kg (industrial, railroad, utility) (2)	Included
8	20 mg/kg	30 mg/kg	Included

Notes:

1. CMAs 3, 6A, 6B, 7A and 7B have different post-remediation soil arsenic goals for different property usages, while CMAs 1, 2, 4, 5 and 8 have goals that are applied regardless of property usage.
2. Includes use of legal mechanism; if the property use changes in the future, further evaluation, and if necessary remediation, will be performed.
3. Includes use of legal mechanism for the non-ICM area of the school property; further action to be performed if the use of the property changes to residential.

**TABLE H-2
EXTENT OF REMEDIATION ON A PROPERTY-SPECIFIC BASIS
DRAFT - MAY 2011
CMS FOR SUSPECTED AIR DEPOSITION AND CULVERT 105 STUDY AREAS
FMC CORPORATION - MIDDLEPORT, NEW YORK**

Property ID (see Notes 1, 2)	Property Usage Considered (see Note 3)	CMA 1				CMA 2				CMA 3				CMA 4				CMA 5							
		To Be Remediated? (Yes / No)	Current Conditions Arsenic Concentration (see Note 4)			To Be Remediated? (Yes / No) (see Note 5)	Estimated Soil Volume to be Remediated (see Note 6) (cu.yds.)	Post-Remediation Arsenic Concentration at Properties to be Remediated (see Note 4)			To Be Remediated? (Yes / No) (see Note 5)	Estimated Soil Volume to be Remediated (see Note 6) (cu.yds.)	Post-Remediation Arsenic Concentration at Properties to be Remediated (see Note 4)			To Be Remediated? (Yes / No) (see Note 5)	Estimated Soil Volume to be Remediated (see Note 6) (cu.yds.)	Post-Remediation Arsenic Concentration at Properties to be Remediated (see Note 4)			To Be Remediated? (Yes / No) (see Note 5)	Estimated Soil Volume to be Remediated (see Note 6) (cu.yds.)	Post-Remediation Arsenic Concentration at Properties to be Remediated (see Note 4)		
			Maximum (mg/kg)	Surface Average (mg/kg)	All Depths Average (mg/kg)			Maximum (mg/kg)	Surface Average (mg/kg)	All Depths Average (mg/kg)			Maximum (mg/kg)	Surface Average (mg/kg)	All Depths Average (mg/kg)			Maximum (mg/kg)	Surface Average (mg/kg)	All Depths Average (mg/kg)			Maximum (mg/kg)	Surface Average (mg/kg)	All Depths Average (mg/kg)
S24	residential	No	52.5	33	29	Yes	320	13.9	5.0	6.3	Yes	110	33.5	17	19	Yes	60	41.3	23	25	No	0	--	--	--
S25	residential	No	82.1	42	33	Yes	480	12.5	5.0	6.2	Yes	120	39.5	11	20	Yes	90	39.5	23	25	Yes	90	39.5	23	25
S27	residential	No	44.0	23	22	Yes	440	16.4	6.2	6.7	Yes	140	30.6	19	18	No	0	--	--	--	No	0	--	--	--
T1	residential	No	88.5	55	40	Yes	420	12.7	5.0	5.7	Yes	250	25.8	5	10	Yes	190	48.4	5	16	Yes	140	67.5	38	29
T2	residential	No	50.1	40	39	Yes	410	5.0	5.0	5.0	Yes	310	31.3	5	9	Yes	130	47.6	23	28	No	0	--	--	--
T3	residential	No	49.3	29	30	Yes	510	19.5	5.0	7.4	Yes	270	27.1	13	13	No	0	--	--	--	No	0	--	--	--
T6	residential	No	28.6	22	20	Yes	310	16.3	7.0	7.8	Yes	50	28.6	16	17	No	0	--	--	--	No	0	--	--	--
U4	residential	No	46.9	20	20	Yes	800	19.8	7.6	8.4	Yes	120	30.7	17	17	No	0	--	--	--	No	0	--	--	--
Roy Hart School	public/institutional	No	228	30	18	Yes	19,110	19.9	6.1	5.1	No	0	--	--	--	No	0	--	--	--	No	0	--	--	--
Culvert 105 crossing 7 streets	public	No	un-sampled property			No	0	--	--	--	No	0	--	--	--	No	0	--	--	--	No	0	--	--	--

CMA 1
Properties
to be
Remediated
0

CMA 2	Total Est'd.
# Properties	Volume to be
to be	Remediated
Remediated	228,000
181	cu.yds.

CMA 3	Total Est'd.
# Properties	Volume to be
to be	Remediated
Remediated	69,000
152	cu.yds.

CMA 4	Total Est'd.
# Properties	Volume to be
to be	Remediated
Remediated	38,000
86	cu.yds.

CMA 5	Total Est'd.
# Properties	Volume to be
to be	Remediated
Remediated	28,000
48	cu.yds.

Notes:

See Notes at bottom of Page 8.

**TABLE H-2
EXTENT OF REMEDIATION ON A PROPERTY-SPECIFIC BASIS
DRAFT - MAY 2011
CMS FOR SUSPECTED AIR DEPOSITION AND CULVERT 105 STUDY AREAS
FMC CORPORATION - MIDDLEPORT, NEW YORK**

Property ID (see Notes 1, 2)	CMA 6A					CMA 6B					CMA 7A					CMA 7B					CMA 8				
	To Be Remediated? (Yes / No) (see Note 5)	Estimated Soil Volume to be Remediated (see Note 6) (cu.yds.)	Post-Remediation Arsenic Concentration at Properties to be Remediated (see Note 4)			To Be Remediated? (Yes / No) (see Note 5)	Estimated Soil Volume to be Remediated (see Note 6) (cu.yds.)	Post-Remediation Arsenic Concentration at Properties to be Remediated (see Note 4)			To Be Remediated? (Yes / No) (see Note 5)	Estimated Soil Volume to be Remediated (see Note 6) (cu.yds.)	Post-Remediation Arsenic Concentration at Properties to be Remediated (see Note 4)			To Be Remediated? (Yes / No) (see Note 5)	Estimated Soil Volume to be Remediated (see Note 6) (cu.yds.)	Post-Remediation Arsenic Concentration at Properties to be Remediated (see Note 4)			To Be Remediated? (Yes / No) (see Note 5)	Estimated Soil Volume to be Remediated (see Note 6) (cu.yds.)	Post-Remediation Arsenic Concentration at Properties to be Remediated (see Note 4)		
			Maximum (mg/kg)	Surface Average (mg/kg)	All Depths Average (mg/kg)			Maximum (mg/kg)	Surface Average (mg/kg)	All Depths Average (mg/kg)			Maximum (mg/kg)	Surface Average (mg/kg)	All Depths Average (mg/kg)			Maximum (mg/kg)	Surface Average (mg/kg)	All Depths Average (mg/kg)			Maximum (mg/kg)	Surface Average (mg/kg)	All Depths Average (mg/kg)
S24	Yes	110	33.5	17	19	Yes	110	33.5	17	19	Yes	250	25.7	5	8	Yes	250	25.7	5	8	Yes	250	25.7	5	8
S25	Yes	290	29.9	17	16	Yes	290	29.9	17	16	Yes	290	29.9	17	16	Yes	290	29.9	17	16	Yes	290	29.9	17	16
S27	Yes	140	30.6	19	18	Yes	140	30.6	19	18	Yes	140	29.0	16	17	Yes	140	29.0	16	17	Yes	140	29.0	16	17
T1	Yes	250	25.8	5	10	Yes	250	25.8	5	10	Yes	250	25.8	5	10	Yes	250	25.8	5	10	Yes	250	25.8	5	10
T2	Yes	310	31.3	5	9	Yes	310	31.3	5	9	Yes	400	21.6	5	7	Yes	400	21.6	5	7	Yes	400	21.6	5	7
T3	Yes	270	27.1	13	13	Yes	270	27.1	13	13	Yes	270	27.1	13	13	Yes	270	27.1	13	13	Yes	270	27.1	13	13
T6	Yes	50	28.6	16	17	Yes	50	28.6	16	17	Yes	50	28.6	16	17	Yes	50	28.6	16	17	Yes	50	28.6	16	17
U4	Yes	120	30.7	17	17	Yes	120	30.7	17	17	Yes	180	29.4	15	16	Yes	180	29.4	15	16	Yes	180	29.4	15	16
Roy Hart School	No	0	--	--	--	Yes	13,490	34.7	14	9	No	0	--	--	--	Yes	17,800	29.0	9	7	Yes	17,800	29.0	9	7
Culvert 105 crossing 7 streets	No	0	--	--	--	No	0	--	--	--	No	0	--	--	--	No	0	--	--	--	Yes	1,690	un-sampled property		

CMA 6A	Total Est'd.
# Properties to be Remediated	Volume to be Remediated
157	85,000 cu.yds.

CMA 6B	Total Est'd.
# Properties to be Remediated	Volume to be Remediated
158	98,000 cu.yds.

CMA 7A	Total Est'd.
# Properties to be Remediated	Volume to be Remediated
164	101,000 cu.yds.

CMA 7B	Total Est'd.
# Properties to be Remediated	Volume to be Remediated
165	119,000 cu.yds.

CMA 8	Total Est'd.
# Properties to be Remediated	Volume to be Remediated
179	162,000 cu.yds.

Notes:

- With agreement by the Agencies, eighteen CMS properties (B8, F7, F11, F12, G5, G8, I15, I19, L2, M4, N15, N16, P10, S26, T5, R1a-b, AC5 and AE2) have not been sampled and were not evaluated for remediation under the CMAs, with the exception of three properties (B8, M4 and AC5) with assumed remediation along the Culvert 105 buried pipe under CMA 8. FMC will offer to perform soil sampling and analysis at these un-sampled properties during the CMI, pursuant to a process approved by the Agencies. If written access permission is obtained from the property owner, then sampling and analysis will be conducted.
- The information shown in this table has been compiled to support development of this Draft CMS Report. Design remediation limits and volumes are estimates based on available data.
The actual design limits and volumes of soil expected to be remediated will be determined during the remedial design activities of the Corrective Measures Implementation, which will occur after selection of the final corrective measure(s) by the Agencies.
- The identification of land usage (i.e., residential, commercial, industrial, recreational, open land, agricultural, public, institutional, railroad, utility) considered for each property is taken from Figure C-2 in Appendix C of the Draft CMS Report.
- Post-remediation soil arsenic concentrations are calculated as described in Section II of Appendix H.
-- = No remediation at this property; see CMA 1 for concentration information.
- (a) = Includes removal of existing Culvert 105 buried pipe and replacement in-kind.
- The estimated volume includes an upward adjustment by thirty percent to account for implementation factors (e.g., based on practicability of remediation within the estimated areas and depths identified to be remediated, or other property-specific conditions).
An additional nine percent was applied to the estimated volume of soil to be remediated at each of the eight large properties (R1a-north, R1a-south, R1b, R1d, AD1, AE1, AF1 and the non-ICM area of the Roy-Hart School Property) as calculated by the property-wide average method under CMAs 3 through 8 (see Section II).

**TABLE H-3
COMPARISON OF DATA AVERAGING METHODS FOR LARGE PROPERTIES UNDER CMA 8
DRAFT - MAY 2011
CMS FOR SUSPECTED AIR DEPOSITION AND CULVERT 105 STUDY AREAS
FMC CORPORATION - MIDDLEPORT, NEW YORK**

Large Property	Property-Wide Data Averaging Method			Grid Sub-Area Data Averaging Method				
	# Sample Points to be Remediated	Estimated Area to be Remediated (acres)	Estimated Volume of Soil to be Remediated (cu. yds.)	# Sample Points to be Remediated	Estimated Area to be Remediated (acres)	Estimated Volume of Soil to be Remediated (cu. yds.)		
Non-ICM Area of Roy-Hart School Property	67	12.7	12,554	67	12.7	12,554		
AD1	93	5.4	9,410	95	5.9	9,649		
AE1	77	2.4	4,082	77	2.4	4,082		
AF1	86	3.0	5,008	86	3.0	5,008		
R1a-north	90	13.6	13,901	91	14.2	14,160		
R1a-south	42	6.9	10,490	42	6.9	10,490		
R1b	93	16.8	15,066	108	22.8	18,822		
R1d	7	1.8	1,821	16	6.2	4,209		
	Total:		62.6	72,332	Total:		74.1	78,974

Difference between (increase in) volume calculated using grid sub-area method compared to property-wide data averaging method:

$$= \{ (78,974 - 72,332) / 72,332 \} * 100\% = 9\%$$

- Notes:**
1. Data averaging grid sub-areas shown on Figures H-9a to H-9e.
 2. Increase in volume (nine percent) from the example calculation for CMA 8 above was used as an upward adjustment factor to estimate soil remediation volumes for the eight large properties (listed above) under CMAs 3 through 8.

TABLE H-4
SUMMARY OF POST-REMEDATION SOIL ARSENIC CONCENTRATIONS BY PROPERTY USAGE TYPE (AT PROPERTIES TO BE REMEDIATED)
DRAFT - MAY 2011
CMS FOR SUSPECTED AIR DEPOSITION AND CULVERT 105 STUDY AREAS
FMC CORPORATION - MIDDLEPORT, NEW YORK

Property Usage Type (1)	Post-Remediation Soil Arsenic Concentrations at Properties Identified to be Remediated Under the CMA																										
	CMA 2			CMA 3			CMA 4			CMA5			CMA 6A			CMA 6B			CMA 7A			CMA 7B			CMA 8		
	Maximum (mg/kg)	Surface Average (mg/kg)	All Depths Average (mg/kg)	Maximum (mg/kg)	Surface Average (mg/kg)	All Depths Average (mg/kg)	Maximum (mg/kg)	Surface Average (mg/kg)	All Depths Average (mg/kg)	Maximum (mg/kg)	Surface Average (mg/kg)	All Depths Average (mg/kg)	Maximum (mg/kg)	Surface Average (mg/kg)	All Depths Average (mg/kg)	Maximum (mg/kg)	Surface Average (mg/kg)	All Depths Average (mg/kg)	Maximum (mg/kg)	Surface Average (mg/kg)	All Depths Average (mg/kg)	Maximum (mg/kg)	Surface Average (mg/kg)	All Depths Average (mg/kg)	Maximum (mg/kg)	Surface Average (mg/kg)	All Depths Average (mg/kg)
Residential	20	7	7	40	14	15	60	21	21	79	23	22	35	13	14	35	13	14	30	11	12	30	11	12	30	11	12
Public/Institutional	20	8	7	57	21	21	57	21	21	64	23	21	31	12	11	31	12	11	28	9	10	28	9	10	28	9	10
Agricultural/Commercial	20	6	6	74	29	26	59	26	24	77	31	27	49	24	23	49	24	23	49	23	22	49	23	22	30	10	10
Industrial/Railroad/Utility	20	6	5	78	16	13	60	18	16	78	19	15	78	16	13	78	16	13	78	16	13	78	16	13	30	10	10
Roy-Hart School (Non-ICM)	20	6	5	no further action under this CMA (2)			no further action under this CMA			no further action under this CMA			no further action under this CMA (2)			35	14	9	no further action under this CMA (2)			29	9	7	29	9	7
All Properties	20	7	7	78	14	16	60	21	21	79	23	22	78	13	14	78	13	14	78	11	12	78	11	12	30	11	11

Notes:
1. Property usage type identified for individual properties in Table H-2; see Note 2 of Table H-1 regarding use of legal mechanisms for non-residential property usage.
2. CMAs 3, 6A and 7A include use of legal mechanism for the non-ICM area of the school property; further action to be performed if the use of the property changes to residential.

**TABLE H-5
EXTENT OF REMEDIATION ON A STUDY AREA-WIDE BASIS
DRAFT – MAY 2011
CMS REPORT FOR SUSPECTED AIR DEPOSITION AND CULVERT 105 STUDY AREAS
FMC CORPORATION – MIDDLEPORT, NEW YORK**

Corrective Measures Alternative	Number of Properties to be Remediated	Total Estimated Area of Soil to be Remediated (acres)	Total Estimated Volume of Soil to be Remediated (cubic yards)	Estimated Length of Culvert 105 Buried Pipe to be Replaced (linear feet)	Figure(s) in Appendix H Showing the Estimated Limits of Remediation
1	0	0	0	0	H-1
2	181	127	228,000	1,325	H-2a, H-2b
3	152	50	69,000	1,185	H-3a, H-3b
4	86	26	38,000	900	H-4a, H-4b
5	48	18	28,000	900	H-5a, H-5b
6A	157	62	85,000	1,185	H-6a, H-6c
6B	158	73	98,000	1,185	H-6b, H-6c
7A	164	71	101,000	1,185	H-7a, H-7c
7B	165	85	119,000	1,185	H-7b, H-7c
8	179	104	162,000	3,025	H-8a to H-8d