GZA
GeoEnvironmental, Inc.

Engineers and Scientists

December 4, 2007
File No. 32795.16

Ms. Joan Taylor
Rhode Island Department of Environmental Management
Office of Waste Management
235 Promenade Street
Providence, Rhode Island 02908

Re: Interim Compliance Monitoring Plan for Source Control Remedy
Charbert Facility
Alton, Rhode Island

Dear Ms. Taylor:

140 Broadway
Providence
Rhode Island
02903
401-421-4140
Fax: 401-751-8613
www.gza.com

GZA GeoEnvironmental, Inc. is pleased to present two copies of the attached Interim Compliance Monitoring Plan (CMP) on behalf of our client, Charbert, a division of NFA. Corp. (Charbert), located at 299 Church Street in Richmond, Rhode Island (the "Site").

This plan describes both the system performance monitoring for the active remedial components recently installed at the facility, and the interim regulatory compliance point monitoring. This plan is considered "interim" because a final site-wide environmental compliance monitoring program will be developed once the bedrock portion of the site investigation, and the lagoon closures, have been completed. GZA has developed this CMP to address the requirements established by Section 9.00 of the RIDEM's Rules and Regulations for the Investigation and Remediation of Hazardous Materials Releases (DEM-DSR-01-93 Remediation Regulations) and pursuant to your verbal request of November 21, 2007.

This plan includes the location of proposed environmental monitoring points; a sampling schedule; the methods of sample collection, preservation and analysis; data reduction; statistical interpretation; and reporting.

We look forward to the Department's approval of the proposed remedial measures. If you have any questions or comments, please do not hesitate to contact Ed Summerly at 401-421-4140 or by e-mail at Edward.summerly@gza.com.

Very truly yours,

GZA GEOENVIRONMENTAL, INC.

Steve Andrus
Project Engineer

Edward A. Summerly, P.G.
Associate Principal

EAS/SA:mac

CC: Cynthia Gianfrancesco, RIDEM
Mary Morgan, Town of Richmond
Clark Memorial Library – Charbert Repository

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1.00 MONITORING PROGRAM OVERVIEW

This document describes the interim Compliance Monitoring Plan (CMP) for the Charbert Manufacturing Facility site located at 299 Church Street in Richmond, Rhode Island. This plan describes both the system performance monitoring for the active remedial components recently installed at the facility, and the regulatory compliance point monitoring. This plan is considered "interim" because a final site-wide environmental compliance monitoring program will be developed once the bedrock portion of the site investigation and the lagoon closures have been completed. GZA has developed this CMP to address the requirements established by Section 9.00 of the RIDEM's Rules and Regulations for the Investigation and Remediation of Hazardous Materials Releases (DEM-DSR-01-93 Remediation Regulations).

This plan includes the location of proposed monitoring points; a sampling schedule; the methods of sample collection, preservation and analysis; data reduction; statistical interpretation; and reporting requirements.

1.10 SITE DESCRIPTION

The ±113.9 acre Charbert property (consisting of Plat 11A, Lot 6) is located at the confluence of the Wood and Pawcatuck Rivers, at 299 Church Street, in the Town of Richmond, in an area referred to as the Village of Alton, Rhode Island (see Figure 1 for a Site *Locus Map* and *Existing Conditions Site Plan*). The North American Datum (NAD) 1983 Rhode Island State Plane coordinates at the approximate center of the property are 129,015 feet north, and 267,645 feet east (latitude 41° 26'14.0" north, longitude 070° 43' 14.0" west). The facility's standard industrial classification (SIC) code is 2259 (Knitting Mills). The Site has been the location of a textile mill since the mid-1800s and the current facility conducts dyeing and finishing operations of elastic fabrics.

The northwestern portion of the Site is currently developed with twelve inter-connected buildings, forming one, 2-story manufacturing building. The building was originally constructed in approximately 1860 with various renovations occurring throughout the years and the last building was constructed in 1979. The subsequent additions to the main building have resulted in approximately 107,500 square feet of manufacturing, storage, and office space. In addition to the main manufacturing building, the northern portion of the Site is also developed with an industrial waste pump house, a potable well pump house, a fire water tower, three process water tanks, three bunkered oil storage areas and two outdoor storage areas. There are two paved employee parking areas; one is located immediately east of the manufacturing area and is used for employee and visitor parking. The second employee parking lot is located to the east of the manufacturing building, across River Street.

The southern portion of the Site consists of undeveloped wetlands, forested areas, three active waste water treatment lagoons (Lagoons 1, 2, and 3) and one currently inactive temporary holding pond. The three active lagoons have an approximate total leaching area of 142,835 square feet (3.29 acres), and the holding pond has an approximate leaching area of 22,600 square feet (0.51 acres).

1.20 EXISTING SITE MONITORING AND REPORTING

Three environmental monitoring and reporting programs are currently ongoing at the Charbert facility. These consist of: 1) the quarterly UIC groundwater sampling and analysis program; 2) the quarterly residential tap water sampling of three River Street residences (14, 16 and 18); and 3) the on going bedrock aquifer investigation. A closure plan is currently being developed for the UICs. Thus monitoring for this program will continue until such time as the UICs are closed and post-closure groundwater quality has been confirmed.

2.00 SVE/AIR SPARGE SYSTEM PERFORMANCE MONITORING

The following subsections describe the monthly performance monitoring for the soil vapor extraction (SVE)/air sparge (AS) systems installed within and to the immediate west of the Charbert Manufacturing facility. Note, during system start-up and initial tuning this monitoring will likely be conducted on a weekly basis for a period of four to six weeks.

2.10 SOIL VAPOR EXTRACTION SYSTEM

Following its installation and initial performance evaluation, qualified environmental personnel will visit the Site on approximately a monthly basis to monitor the SVE system. During each visit, the following data will be measured at each of the 37 vent wells:

1. Air flow rates;
2. Vacuum response in inches of water column (IW);
3. Total Volatile Organic Compounds (TVOC) measurements using a photoionization detector (PID) equipped with a 10.6 eV lamp, and
4. O_2, CO_2 and Lower Explosive Limit (LEL) measurements will be collected utilizing a Land-Tech infrared gas meter (or equivalent).

2.20 AIR SPARGE SYSTEM

Following its installation and initial performance evaluation, qualified environmental personnel will visit the site on a monthly basis to monitor the air sparge system. The following field monitoring parameters will be performed at each of the 30 sparge points:

1. Air flow rates, and
2. Air pressures.

2.30 REPORTING

The results of the monitoring and maintenance work described above will be reviewed with respect to:

- TVOC, O_2 and CO_2 Levels within the withdrawn soil vapor;
- SVE flows and the associated radius of influence;
- Air sparging flows and pressures and the associated radius of influence;
- Oxygen introduction and consumption; carbon dioxide generation; and estimated rates of hydrocarbon removal via biodegradation and physical venting to the GAC unit; and
- GAC unit maintenance.

As requested by RIDEM, a quarterly report of the remedial system monitoring will be provided including any required system adjustments or modifications.

2.40 REMEDIAL SYSTEMS OPERATING LOG

An Operating Log will be maintained at the facility and be readily available at the Site during the period of active remediation and subsequent monitoring activities. Subsequent to this period, the log will be retained for a minimum period of three years.

In addition to the data recordings identified above, the Operating Log will include, at a minimum, the following information:

- Dates and time periods during which the remedial components described herein were ongoing;
- Records of any laboratory analysis and field screening performed as part of the remedial action;
- Description of instances under which the Contingency Plan was implemented; and

- Inspection reports detailing compliance with the remedial specifications described herein and the actions taken to address non-compliant practices/conditions.

A copy of the Operating Log will be provided to the Department at the completion of the project as part of the *Remedial Action Summary Report*.

3.00 INTERIM COMPLIANCE MONITORING PLAN

This CMP provides written guidelines to assess the effectiveness of the air sparge and soil vapor extraction systems at reducing the concentrations of chlorinated aliphatic hydrocarbons (CAHs) and petroleum hydrocarbons (TPH) within and downgradient of contaminant source areas identified in the vicinity of the Charbert Manufacturing Facility.

As described in Section 4.22 of the October 15, 2007 Remedial Action Work Plan, the points of compliance for the source control remedy are the downgradient Charbert property boundaries along the Wood and Pawcatuck Rivers, and along River Street. Contaminant concentrations at the points of compliance will be reduced from their current levels to RIDEM's GA Groundwater Objectives. A groundwater residual zone will be established between the identified source areas and the compliance boundaries. Compliance with RIDEM's GA Groundwater Objectives will be demonstrated through the implementation of a routine groundwater sampling and analytical program conducted in a downgradient monitoring well network.

This interim compliance program focuses on monitoring downgradient of the newly installed Soil vapor extraction and Air Sparge systems. A sitewide environmental monitoring program, and associated well network, will be developed following completion of the bedrock aquifer evaluation and bedrock SIR estimated to be completed in 9 to 12 months.

3.10 GROUNDWATER MONITORING

Existing and proposed groundwater monitoring well locations were selected based on our review of historical groundwater sampling results, piezometric monitoring of the Site and adjacent area, and anticipated changes to the groundwater flow directions following the mill closure scheduled for February of 2008. Current and proposed monitoring locations are shown on Figure 2. The wells have been selected to provide both upgradient and downgradient groundwater quality monitoring in the uppermost and

lower overburden aquifer. Monitoring well spacing and screen depths were selected, within physical site constraints, to detect groundwater contamination, if present.
Based on review of the current monitoring program, past analytical data and site hydrogeology, we propose the following monitoring locations which consist of two existing upgradient wells, 7 existing downgradient wells and 4 proposed downgradient wells. These locations are summarized in the table below:

SUMMARY OF GROUNDWATER WATER MONITORING LOCATIONS		
Monitoring Location ID	**Relative Location And Approximate Depth**	**Rational**
RIZ-1 (Existing)	Main Parking Lot 15 Feet Deep	Shallow Overburden Well Upgradient Background Well
RIZ-6 (Existing)	West of Manufacturing Building 15 Feet Deep	Shallow Overburden Well Side Gradient Background Well
RIZ-13 (Existing)	Southwest of Manufacturing Building 15 Feet Deep	Shallow Overburden Well Located Within Contaminated Area Coupled with GZ-3
GZ-3 (Existing)	Southwest of Manufacturing Building 35 Feet Deep	Deep Overburden Well Located Within Contaminated Area Coupled with RIZ-13
GP-26 (Existing)	West Side of Manufacturing Building 15 Feet Deep	Shallow Overburden Well Located Within Contaminated Area Coupled with GZ-7
GZ-7 (Existing)	West Side of Manufacturing Building 35 Feet Deep	Deep Overburden Well Located Within Contaminated Area Coupled with GP-26
RIZ-7 (Existing)	Adjacent to Wood River 15 Feet deep	Shallow Overburden Well Located at Southern Edge of Contaminated Area Coupled With GZ-19
GZ-19 (Proposed)	Near RIZ-7 Adjacent to Wood River 35 Feet Deep	Proposed Deep Overburden Well Located Within Contaminated Area Coupled with RIZ-7
RIZ-5 (Existing)	Near Wood River 15 feet Deep	Shallow Overburden Well Located at Southwestern Edge of Contaminated Area Coupled With GZ-20

SUMMARY OF GROUNDWATER WATER MONITORING LOCATIONS		
Monitoring Location ID	**Relative Location And Approximate Depth**	**Rational**
GZ-20 (Proposed)	Near RIZ-5 Adjacent to Wood River 35 Feet Deep	Proposed Deep Overburden Well Located Southwestern Edge of Contaminated Area Coupled with RIZ-5
GP-28 (Existing)	Between Old Lagoon 5 and the Wood River 15 Feet Deep	Located Between Delineated Contamination and The Wood River
GZ-21 (Proposed)	South of Industrial Waste Pump House, Adjacent to Wood River 15 Feet Deep	Shallow Overburden Well Located at Southern Edge of Contaminated Area Coupled With GZ-22
GZ-22 (Proposed)	South of Industrial Waste Pump House, Adjacent to Wood River 35 Feet Deep	Proposed Deep Overburden Well Located at Southern Edge of Contaminated Area Coupled With GZ-21

The 1-inch PVC monitoring wells designated CB-5 and CB-6, located south of the fuel oil storage tanks and north of the industrial waste pump house, respectively, will be decommissioned in compliance with Appendix A of RIDEM's Rules and Regulations for Groundwater Quality. The details for the decommissioning of obsolete wells can be found in Section 4.20.

3.20 GROUNDWATER MONITORING VIA DIFFUSION BAGS

Diffusion bag samplers will be placed in the bed of the Wood River adjacent to the Charbert Facility as was done during the Bedrock Aquifer Evaluation. The purpose of this monitoring is to evaluate the VOC levels of groundwater seepage to the river. Five proposed diffusion bag monitoring locations are shown on Figure 1.

4.00 FIELD SAMPLING PROGRAM

The following paragraphs describe the proposed field sampling program at the Charbert Manufacturing Facility. This section includes sampling frequencies, well decommissioning and installation, and sampling and analysis procedures.

4.10 FIELD SAMPLING SCHEDULE

For the two (2) background wells, RIZ-1 and RIZ-6, we recommend an initial sample taken immediately prior to starting the SVE/AS system followed by an annual sampling frequency. For the eleven (11) remaining wells listed in the above table we recommend a quarterly program, beginning immediately prior to SVE/AS system start-up, for the first 8 quarters. After the first 8 quarters it may be appropriate to reduce the sampling frequency to semi-annual corresponding to periods of seasonal high and low groundwater (e.g., March/April and September/October). Seasonal groundwater levels will be evaluated prior to choosing a time (date) in which these samples will be collected.

4.20 MONITORING WELL DECOMISSIONING PROGRAM

After a re-evaluation of the site and past groundwater monitoring data, we recommend that the monitoring wells that are not included in the long-term closure and compliance monitoring program be closed in general accordance with the requirements set forth in Appendix A of the RIDEM's Rules and Regulations for Groundwater Quality. The methods for decommissioning are as follows:

- The wells are to be inspected from the land surface through their entire depth to evaluate if any obstructions that would interfere with sealing operations are present. If they are, the well must be drilled out and grouted, if not proceed to the next step.
- The wells are to be abandoned by removing the protective steel guard pipe and cutting off the PVC casing at approximately 4 feet below ground surface (or to the practical reach of PVC cutting tools).
- The well screen and casing are to be completely filled with a cement/bentonite grout, tremied into place by a grout tube from the bottom of the well up.
- A neat cement plug is to be extended all the way to ground surface at each location.

4.30 GROUNDWATER SAMPLING PROCEDURES

Static water level readings will be recorded from each observation well prior to well purging. Water level readings will be recorded in all standpipe wells by use of an electronic measuring device (e.g., Slope Indicator Co. water level meter) capable of providing ±0.01 foot accuracy.

Various well specific measurements will be made and recorded in field data books. Where applicable, such information will include - the total depth of well, depth to standing water from top of riser pipe, depth to standing water from top of protective casing, distance between top of protective casing and riser pipe, and observations regarding tampering or damage.

Groundwater sampling will be performed in general accordance with EPA's July 30, 1996 *Low Stress (low flow) Purging and Sampling Procedure* (Low Flow SOP). Low flow sampling equipment (exclusive of tubing which will be dedicated) will be decontaminated prior to use on-site and between each location following EPA's required protocols. Water quality monitoring for stabilization will be conducted utilizing a Horiba multi-meter (or equivalent) in a flow through cell. The Horiba records temperature, pH, specific conductance, dissolved oxygen, and turbidity simultaneously, and is one of the few meters which includes turbidity in a flow through system improving reproducibility and reducing sampling time. Field equipment used to perform the testing will be calibrated according to the manufacturer's instructions before each sampling day, and confirmatory readings will be taken at the end of each sampling day.

Low flow well evacuation will be performed using a pump (i.e., stainless-steel submersible such as the Grundfos Redi-flow 2 or a peristaltic pump equipped with a VOC receptacle) capable of low flow (i.e., 100 to 500 ml/minute) steady withdrawal rate that will minimize the introduction of particulate matter from the aquifer. This purging and sampling method generally reduces the concentrations of total suspended solids (TSS) in a well, thus yielding a more representative groundwater sample. Note, if a peristaltic pump is used than inorganics samples will be collected first through the pump and the VOC samples will be obtained using a flow-through (bailer-like) stainless-steel and teflon receptacle attached to the bottom of the pump tubing. This method has been approved for use by both the USEPA and RIDEM.

4.40 LABORATORY ANALYSIS

As described above, groundwater will be sampled and analyzed on a quarterly to annual basis (anticipated to be, March, June, September and December assuming the Order of Approval for the SVE/AS system is issued by RIDEM in early to mid-December 2007) for the first two years following the remedial construction phase at the manufacturing facility, and then semi-annually to annually thereafter. Sample analysis will consist of

six field screening parameters (temperature, pH, oxidation/reduction potential (ORP), specific conductivity, turbidity, and dissolved oxygen) and volatile organic compounds (VOCs) via EPA Method 8260B. In the shallow overburden wells (15 foot deep +/-), samples will also be collected and analyzed for total petroleum hydrocarbon analysis, via EPA 8100M, on an annual basis.

A laboratory appropriately licensed in the State of Rhode Island (certified by Rhode Island Department of Health (RIDOH)) will be retained for all analytical testing.

All sample collection, handling, storage, transportation, and analyses will be conducted in accordance with a rigorous quality assurance and quality control (QA/QC) program to ensure that results are accurate and representative. Analytical results will be evaluated using a modified Tier II approach following the USEPA Region I "Laboratory Data Validation Functional Guidelines for Organic and Inorganic Analyses."

5.00 QUALITY ASSURANCE/QUALITY CONTROL PROGRAM

The sample collection and handling procedures, field screening methods, quality control mechanisms and record keeping are described in this section. The program is intended to provide written guidelines to achieve data reliability/reproducibility and reduce data error. The overall purpose of the QA/QC program is to define the procedures for providing accurate and reliable environmental measurements. This requires that quality control procedures be carried out during both the collection and analysis portions of sampling. Although these tasks are interrelated, a separate discussion follows to clarify the individual tasks required.

The quality assurance (QA) program described herein provides a set of procedures designed to assess the quality of data generated for the project. Quality control (QC) measures are also specified to ensure that the responsible individuals take appropriate actions to ensure the collection of valid data.

It will be the responsibility of all project personnel to abide by the quality control measures established for the project. The QA officer will have overall responsibility for project QA/QC. This individual will perform periodic inspections of field operations to evaluate equipment operation and calibration procedures, record-keeping, chain-of-custody documents, and field data for accuracy and completeness. In an effort to avoid potential laboratory reporting errors, the QA/QC officer will also review laboratory test data as it is received to evaluate reporting format, dilutions, and completeness and laboratory methods.

5.10 EXTERNAL (FIELD) PROGRAM

To provide a uniform basis for the collection of samples and related field measurements Standard Operating Procedures (SOPs) will be followed. To evaluate the effectiveness of these procedures, several checks in the form of duplicate samples and sample blanks will be prepared. The following subsections provide general procedures to be followed for the collection, handling and analysis of field quality control samples.

Specific record keeping and site documentation procedures will be followed during the field program. These procedures will include the use of field notebooks, field sampling data sheets and, when necessary, new boring/monitoring well installation logs. The following paragraphs discuss the procedures to be followed.

5.11 Field Notebooks

Field observations and site activities will be recorded in permanently bound, waterproof notebooks by on-site personnel. All entries shall be made with indelible ink. These notebooks will document personnel present on-site, activities conducted, samples collected and other information deemed necessary by field personnel to achieve project objectives. Field notebooks will be maintained by the project geologist or engineer, and upon project completion, will be maintained in the project files.

During environmental sampling, data will be recorded in a permanently bound waterproof field notebook and on Field Sampling Data Sheets. In addition to the media specific data identified in previous sections of this plan, recorded information will include the following:

- Sampling Location
- Collection Date
- Sample Description
- Name of Collector(s)
- Weather Conditions
- Sampling Time
- Changes/modifications to Sampling Procedures
- Names/Affiliations of Others Present

5.12 Boring/Well Installation

Field observations during the drilling of any new or replacement boreholes, or any other subsequent sub-surface investigations, will be recorded on an exploration log (i.e., borehole/well installation logs). Recorded information will include the following:

- Date and time of boring execution.
- Engineer, Contractor, and Inspector.
- Location and designation (identifying number) of test boring and reference to survey data. Survey data will include the top of well pipe elevation for monitoring wells and ground surface for soil borings.
- Soil screening results (e.g., PID screening)
- Results of boring data from each hole arranged in tabular form giving full information on the vertical arrangement, thickness, and classification of the materials penetrated.
- Depth to bottom, type, and number of each sample taken.
- Height of drop and weight of drop hammer for taking drive samples and driving casing.
- Number of blows required for each six-inch (6") penetration of split-spoon sampler and for each twelve-inch (12") penetration of the casing.
- Size, length, and elevation of bottom of casing used in each borehole.
- Depth to groundwater table, and time of observation.
- Description of samples (e.g., Burmister Soil Classification System).
- Sample recovery.

Prior borehole/well installation logs are attached in Appendix A.

5.13 Trip Blanks

In order to assess the degree and nature of inadvertent contamination associated with sample handling, storage and transportation, VOC analysis will be performed on laboratory prepared samples. The trip blanks consist of a volatile organic compounds (VOCs) sample container (vial) filled with deionized, organic-free water, which is maintained with the other sample containers, prior to and following sample collection. One trip blank will be prepared for each cooler containing VOC samples on everyday of sampling. The trip blank will be analyzed for VOCs only. Trip blanks will accompany the sampler, and subsequently the samples, throughout the sampling effort, transportation, and delivery to the analytical testing laboratory.

5.14 Equipment Decontamination

All non-dedicated, non-new sampling equipment (e.g., bailers, cables, pumps, fittings, tubing, etc.) will be decontaminated prior to use and between samples by the following process.

- a potable water rinse and scrub,
- a non-phosphate detergent (Alconox or Liquinox) wash and scrub,
- a deionized water rinse, and
- air dry.

Down hole measuring equipment (e.g., water level meters, measuring tapes, etc.) which contacts formation water will be rinsed prior to and between uses with potable water and wiped dry with a clean cloth or paper towel.

5.20 INTERNAL (LABORATORY) QA/QC PROGRAM

A laboratory licensed in the State of Rhode Island (RIDOH) will be retained for all analyses. Analytical laboratories will be required to submit a project specific Quality Assurance Plan (QAP) to Charbert for their review and approval prior to performing any analyses. The QAP details procedures routinely employed by the laboratory for the purposes of producing reliable data, and ensuring that generated data conforms to specific requirements for accuracy, precision, and completeness.

Data from laboratory QC samples is used as a measure of laboratory performance or as an indicator of potential sources of cross-contamination. This data will be used to qualify results when appropriate.

5.21 Laboratory Quality Control Samples

The types of internal QC checks and samples performed by laboratory include method and reagent blanks, internal duplicates and replicates, surrogate spikes and calibration check standards. QC samples will be project specific and reported with the analytical results. The QA program requires that laboratory QC samples be performed by "batch" at a minimum of one for every twenty target samples or smaller sample delivery groups (SDG's).

5.22 Sample Preservation and Handling

All sample containers will be provided by the analytical testing laboratory and will be free of contaminants. Samples requiring specific preservations will be prepared by the analytical testing laboratory, where appropriate.

Soil samples collected will be placed in a 40-ml methanol preserved VOA vial and an 8-ounce jar with a Teflon-lined lid and labeled. Groundwater samples collected will be placed in a 40-mil hydrochloric acid preserved VOA vial and labeled. All samples will immediately be place in an ice filled cooler and transported to the analytical laboratory under chain-of-custody.

5.23 Sample Custody Procedures

The logging of a sample (accountability) begins when the sample is taken from its media. Sample labels, chain-of-custody forms and field data records must be

completed in full at the time of sample collection. Sample custody is the responsibility of the field personnel.

Each sample will be assigned a unique identification number which will be used consistently during all sampling rounds and on all documents associated with the project. The sample identification number will be used to track samples through all subsequent handling, analysis and data reduction procedures. Groundwater sample identification will be based on the well numbering system and the date of collection. Example: a sample collected from well GZ-2 on September 15, 2007 would be designated GZ02091507.

Completed labels will be placed on all sample containers following collection. The labels will be consistent for all samples collected and between sampling rounds. At a minimum the label will contain the following information: (1) type of sample (groundwater); (2) sample location (GZ-2); (3) sampling date (mm/dd/yy); and (4) collectors initials (GZA).

The chain-of-custody form will contain information to distinguish individual samples, sampling locations and sampling personnel. An example of the recommended chain-of-custody form is attached in Appendix A. Upon sample collection, the completed chain-of-custody record must accompany the samples at all times after collection. When samples are transferred in possession, the individuals relinquishing and receiving (including receiving laboratory) will sign, date and note the time the transfer occurred on the chain-of-custody record.

6.00 DATA EVALUATION AND REPORTING

This section describes the data evaluation to be employed and the reporting procedures to be used. Reports of groundwater water sampling events will be submitted by Charbert to the RIDEM within 45 days of sample collection as set forth in Rule 12 of the RIDEM Groundwater Regulations.

In accordance with these requirements, each report will include:

-1- A cover letter with a narrative summary of contraventions of water quality standards, sampling dates, sampling observations, and sampling techniques. A table showing the location designation (e.g., well number), the sample collection dates, the sample number, the analytical results, designation of upgradient and compliance wells, applicable water quality standards, and method detection limits (MDLs).

-2- A plan depicting groundwater elevations and inferred flow directions based on current measurements in all wells sampled.

-3- Tables and/or graphical representations comparing current water quality data to previous water quality data and upgradient water quality data based on appropriate statistical evaluations.

If a determination is made of the presence of statistically significant increase in contamination, then this finding will be reported to RIDEM within 30 days of such a determination being made by Charbert.

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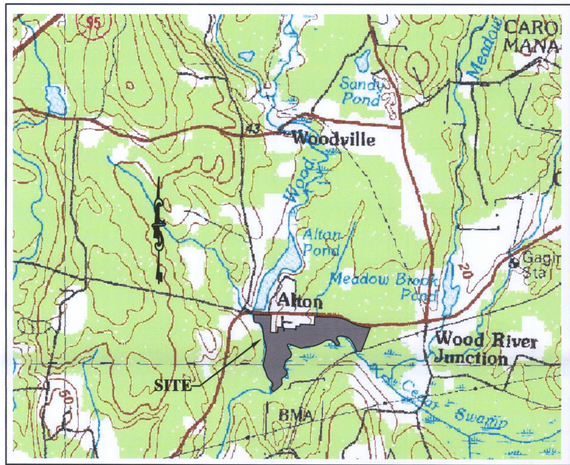
FIGURES



LEGEND

- 200 FT. RIVER BANK BUFFER
- 50 FT. WETLAND BUFFER
- SS — SEWER LINE
- IWW — INDUSTRIAL WASTEWATER LINE
- E — UNDERGROUND ELECTRICAL LINE
- D — STORM WATER DRAINAGE LINE
- OIL — OIL LINE
- SFM — EXISTING SEWER FORCE MAIN
- OHU — OVERHEAD UTILITY
- FEMA 100 FLOOD LEVEL
- PIV — POST INDICATOR VALVE
- HYD — FIRE HYDRANT
- UTILITY POLE
- CHAIN LINK FENCE
- 60 — EXISTING SURFACE CONTOURS
- EDGE OF RIVER

- DB-1 — PREVIOUS DIFFUSION BAG MONITORING LOCATION
- DB-5 — PROPOSED DIFFUSION BAG MONITORING LOCATION
- GZ-7 — EXISTING GROUNDWATER WELL PROPOSED MONITORING POINT
- CB-5 — EXISTING GROUNDWATER MONITORING WELLS TO BE DECOMMISSIONED
- GZ-21 — PROPOSED GROUNDWATER MONITORING WELLS TO BE INSTALLED
- GP-25 — EXISTING GROUNDWATER MONITORING WELL TO REMAIN
- INFERRED GROUNDWATER FLOW DIRECTION BASED ON SIR GROUNDWATER CONTOUR PLANS

- AS-3 — AS-BUILT LOCATION OF AIR SPARGE WELL
- SVE-3 — AS-BUILT LOCATION OF SOIL VAPOR EXTRACTION WELL
- SSVW-4 — AS-BUILT LOCATION OF SUB-SLAB VENT
- SVE-18 — AS-BUILT LOCATION OF SOIL VAPOR EXTRACTION TRENCH

GZA

RIVER EDGE
WETLANDS BOUNDARY
200' RIVER OFFSET
50' WETLANDS OFFSET
OIL BUNKER
DRUM STORAGE AREA
FEMA 100-YEAR FLOOD BOUNDARY
WATER TOWER
INDUSTRIAL WASTE PUMP HOUSE
WOOD RIVER
FORMER (LAGOON 5)
DRILL HOLE FOUND ELEV.: 54.53
CHARBERT MILL BUILDING
LOCATION OF BLOWERS, AIR DRYERS AND CARBON DRUMS FOR INTERIOR AND EXTERIOR SOIL VAPOR EXTRACTION SYSTEMS AND AIR COMPRESSOR FOR INTERIOR AND EXTERIOR SPARGE SYSTEMS
8" SEWER C.O.
HYD
PIV W/BOLLARDS
DB-1
DB-2
DB-3
DB-4
DB-5
DB-6
DB-7
DB-8
GP-28
RIZ-5
GZ-20
RIZ-7
GZ-19
RIZ-6
RIZ-13
GZ-3
GZ-7
GP-26
GZ-21
GZ-22
CB-6
CB-5
RIZ-3
GZ-6
CB-9
GP-27A
GP-22
RIZ-1
EW-4
PT-5
PT-4
EW-3
PT-1
EW-2
PT-2
EW-1
RIZ-21
GZ-1
NECO-4-3
NECO-4-7
NECO-4-5
U/P 1657
U/P 3435
U/P 5
NECO-4-1
U/P 4
#18
#16
#14
#12
#10

GENERAL NOTES

1 BASE MAP DEVELOPED FROM ELECTRONIC CAD FILES PROVIDED BY AEROTECH INTERNATIONAL DIGITAL PHOTOGRAMMETRIC MAPPING DATED 12-01-04, DATE FLOWN MARCH 26, 1999. THE TOPOGRAPHY OF THE LAGOONS, THE 1998, 2001 AND 2004 SOIL STOCK PILES WERE UPDATED BY INSTRUMENT SURVEY CONDUCTED BY GZA PERSONNEL IN SEPTEMBER 2004 THROUGH FEBRUARY 2005.

2 THE LOCATIONS AND ELEVATIONS OF MONITORING WELLS AND EXPLORATIONS WERE APPROXIMATELY DETERMINED BY SURVEY. THIS DATA SHOULD BE CONSIDERED ACCURATE ONLY TO THE DEGREE IMPLIED BY THE METHOD USED.

REV. NO.	DESCRIPTION	BY	DATE

SCALE: 1" = 40'
0 20 40 80

GZA GeoEnvironmental, Inc.
Engineers and Scientists
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CHARBERT FACILITY
ALTON, RHODE ISLAND

INTERIM REMEDIAL SYSTEM PERFORMANCE AND COMPLIANCE MONITORING PLAN

PROJECT NO.
32795.16

FIGURE NO.
1