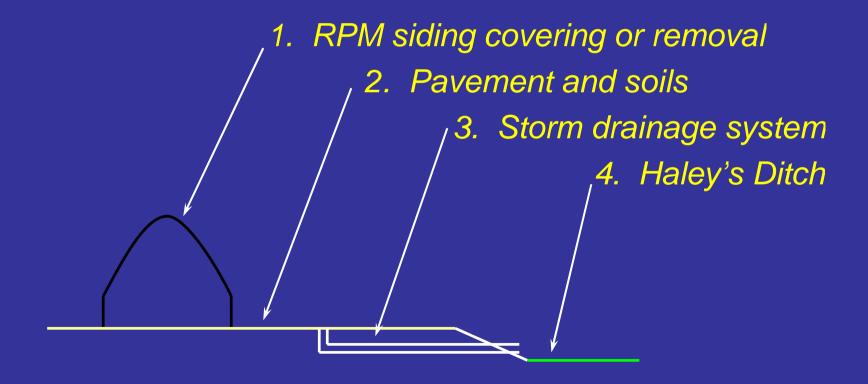


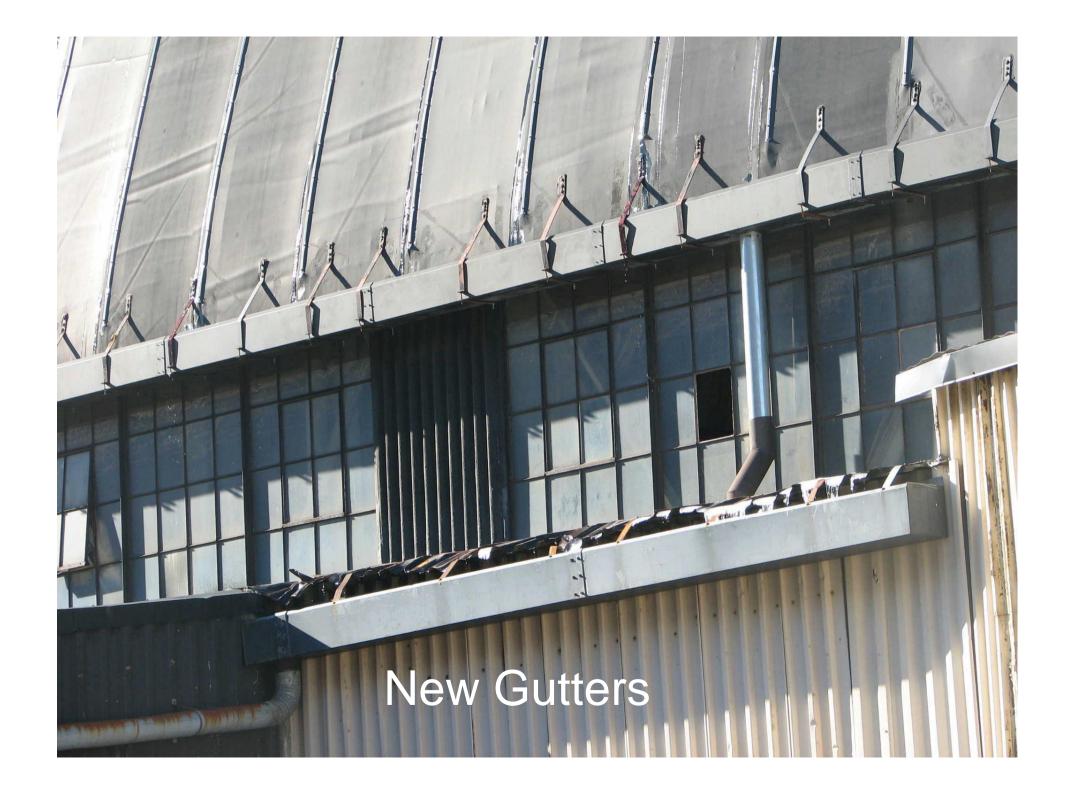
Exterior Cleanup Approach

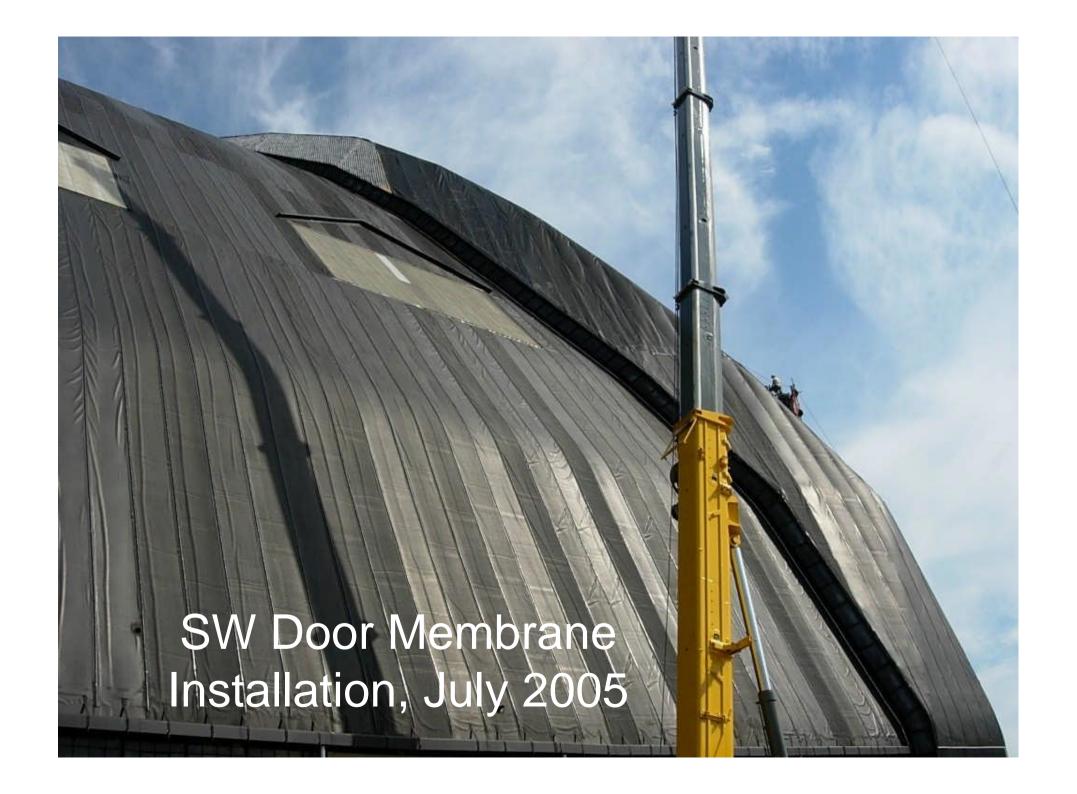
Work from source outwards:



Exterior Progress 2003 to 2007

- Removed visible surface debris from around the Airdock, cleaned accessible storm drain manholes and installed and maintained storm drain filters
- Replaced Gutters (1,920 feet) and completed roof and door covering with rubber membrane (693,000 sq.ft.)
- Completed Vertical siding replacement (2,400 feet, 24 feet tall equal to 57,600 square feet) and replaced siding on two south motor houses and substation
- Demolished Plant M link and Northeast Loading Dock
- Collected and analyzed samples to characterize concrete, soils, pavement and other media to develop action plans as needed



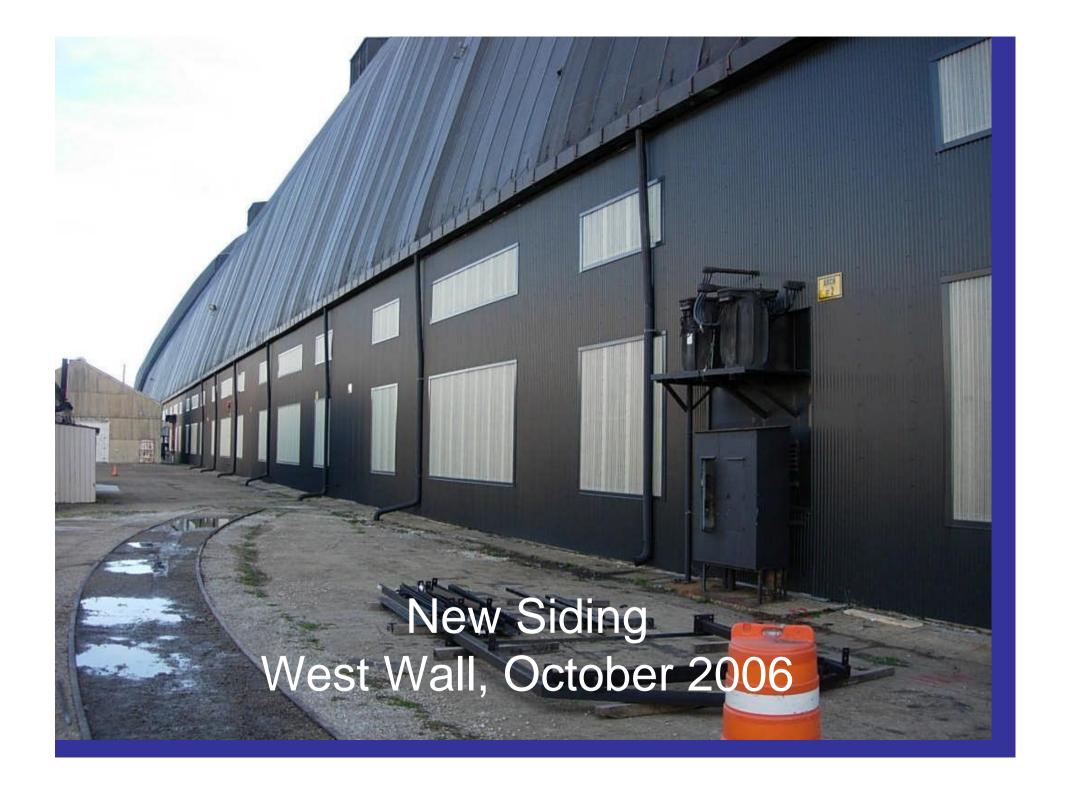


Original Siding

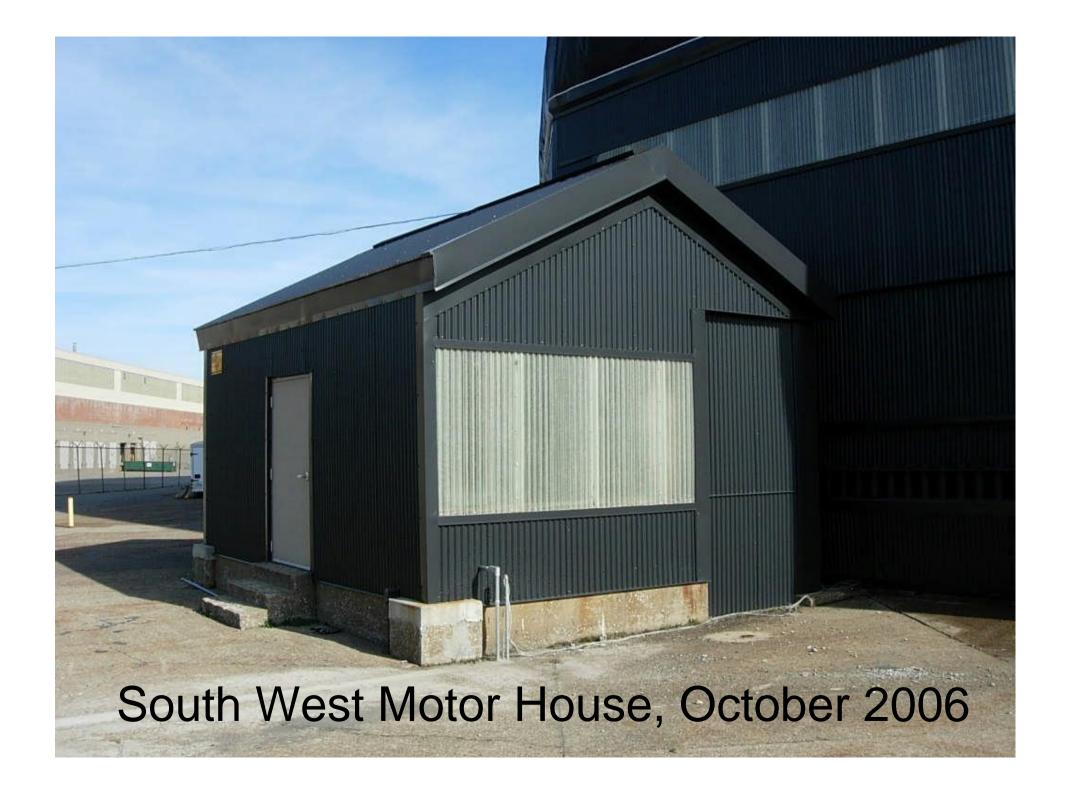


1E-2E, April 2004







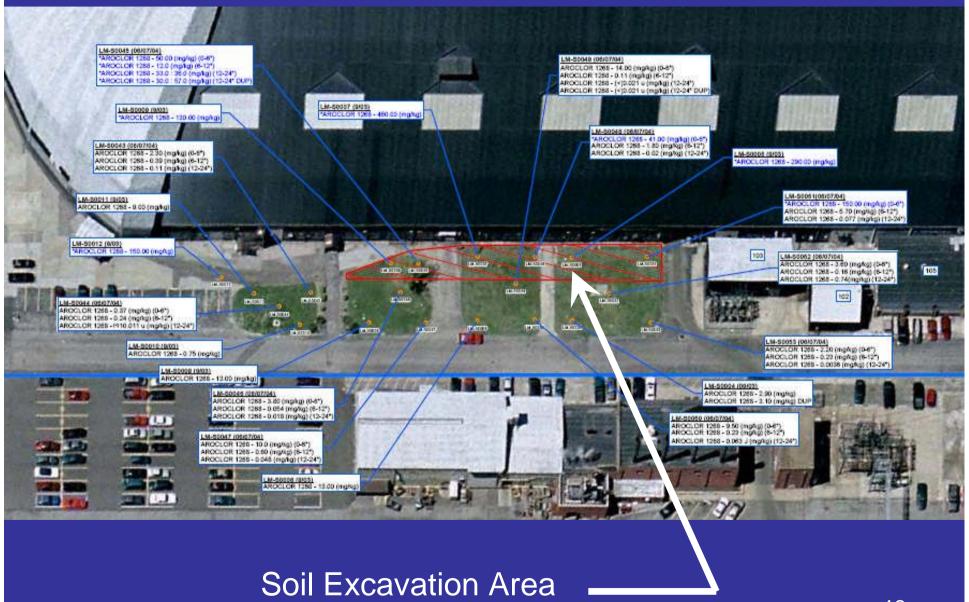




2008 Plans and Progress to Date

- Soil Excavation on SE of Airdock Complete
- Pavement Debris Removal Complete
- Airdock Pinhouse Recoving Underway
- Storm Drain Debris Removal Start 8/25
- Haley's Ditch Planning Underway

Soil Excavation



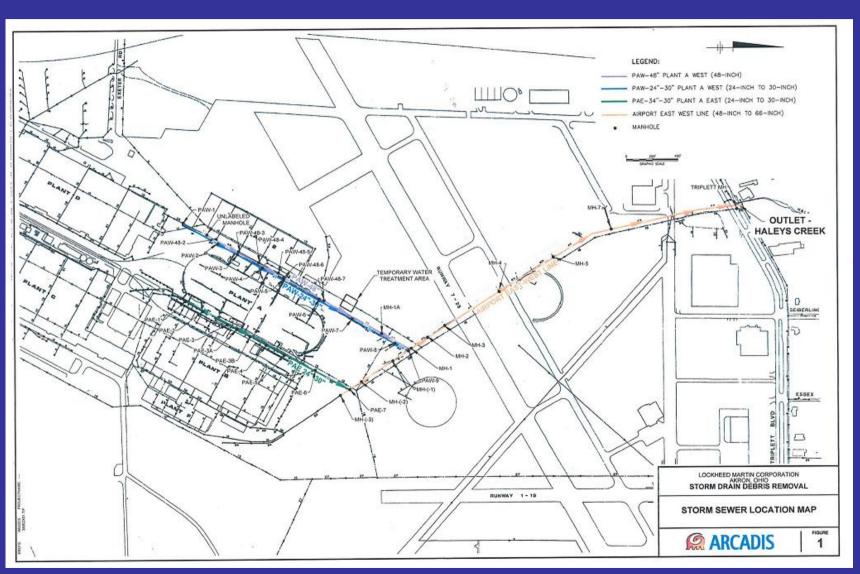
Pavement Debris Removal



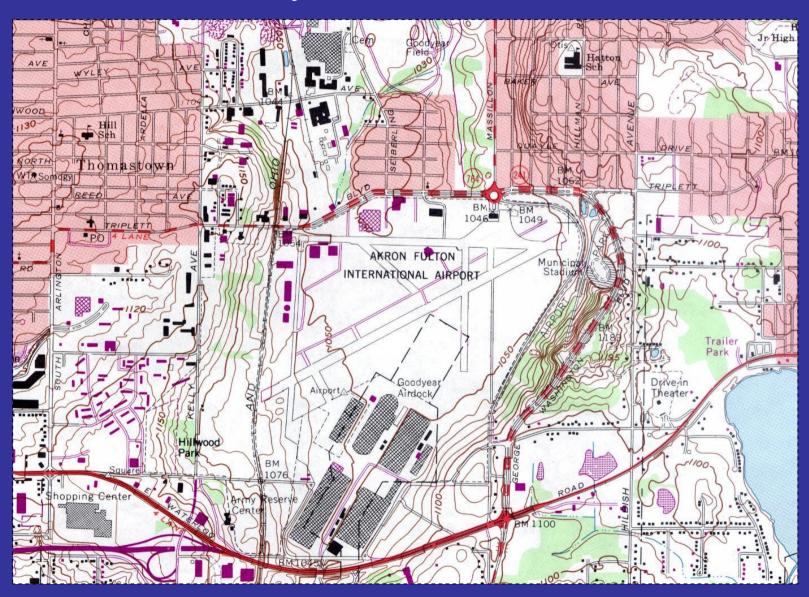
North and South Pinhouse Re-Siding



Storm Drain Debris Removal



Haley's Ditch Location



Schedule

Approval Request to EPA: September 2008

Community Engagement: November 2008 – October 2009

EPA Approval: March 2009

Corps of Engineers Permit Request: March 2009

Corps of Engineer Permit Issued: June 2009

Land Clearing: July 2009

Remediation: August – September 2009

Land Restoration: October 2009



Site Vicinity

- 19-acre VAP property
- DrainageDivide
- Multiple Properties

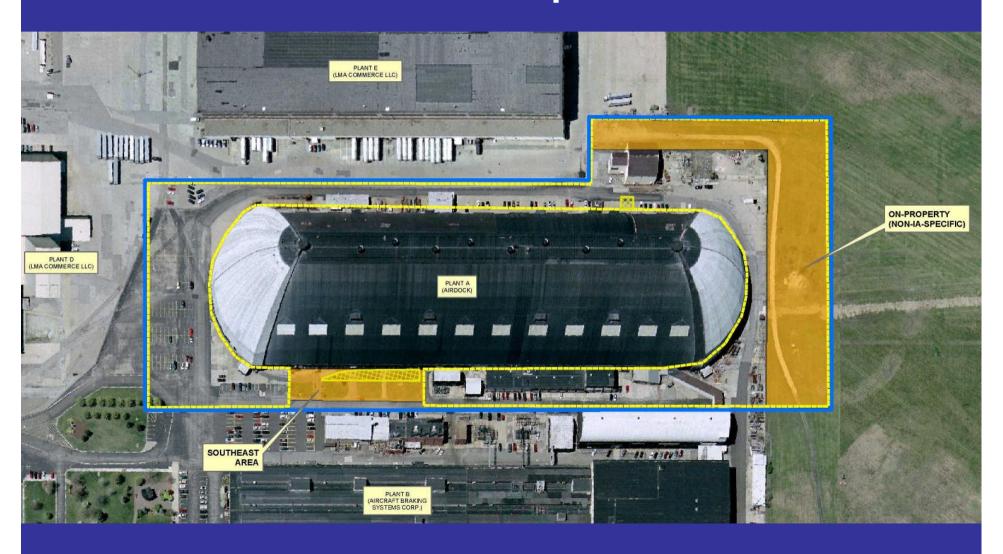
VAP Activities 2005-2008

- 13 Areas assessment and remediation
- Property-Specific risk assessment for multi-media and current and future pathways
- Combination of remediation approaches to meet/maintain applicable standards
 - Active, passive, institutional controls, and engineering controls
- NFA with CNS 2009 (anticipated)

VAP Assessment On/Off Property



Soil Cleanup Areas



PCB Cleanup Levels

- On-Property Soil SE area: 4.9 ppm
- On-Property Soil North area: 1.5 ppm
- Off-Property Soil <1 ppm

(Source: Property-Specific Risk Assessment, March 2008)

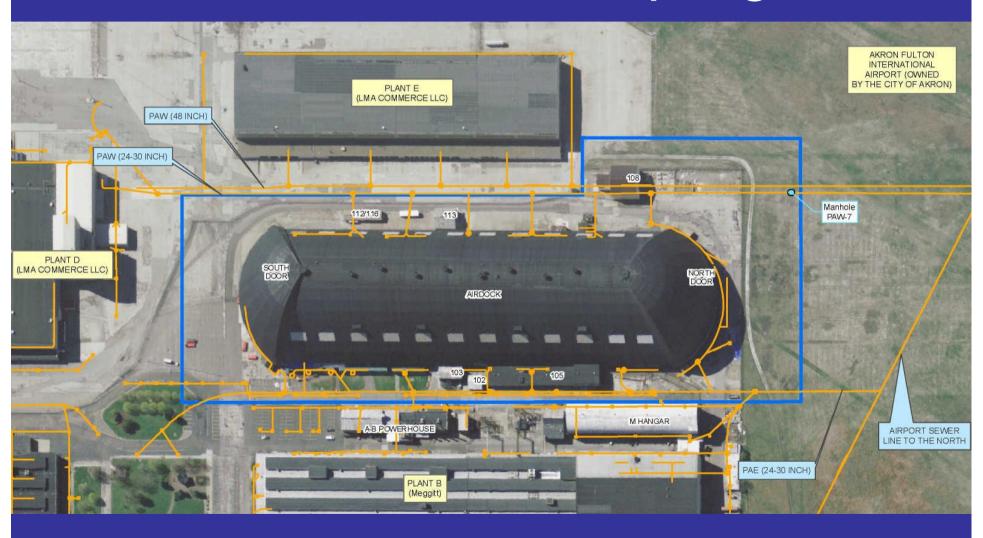
Stormwater Pathway - VAP Issue

"An assessment should be conducted to determine whether PCBs remaining in the soils on the property could result in ongoing and future PCB contamination entering the storm drainage system and emanating from the property. This potentially complete PCB migration pathway needs to be assessed to demonstrate that applicable standards have been met." Ohio EPA, 10/23/2007

Stormwater Pathway - Approach

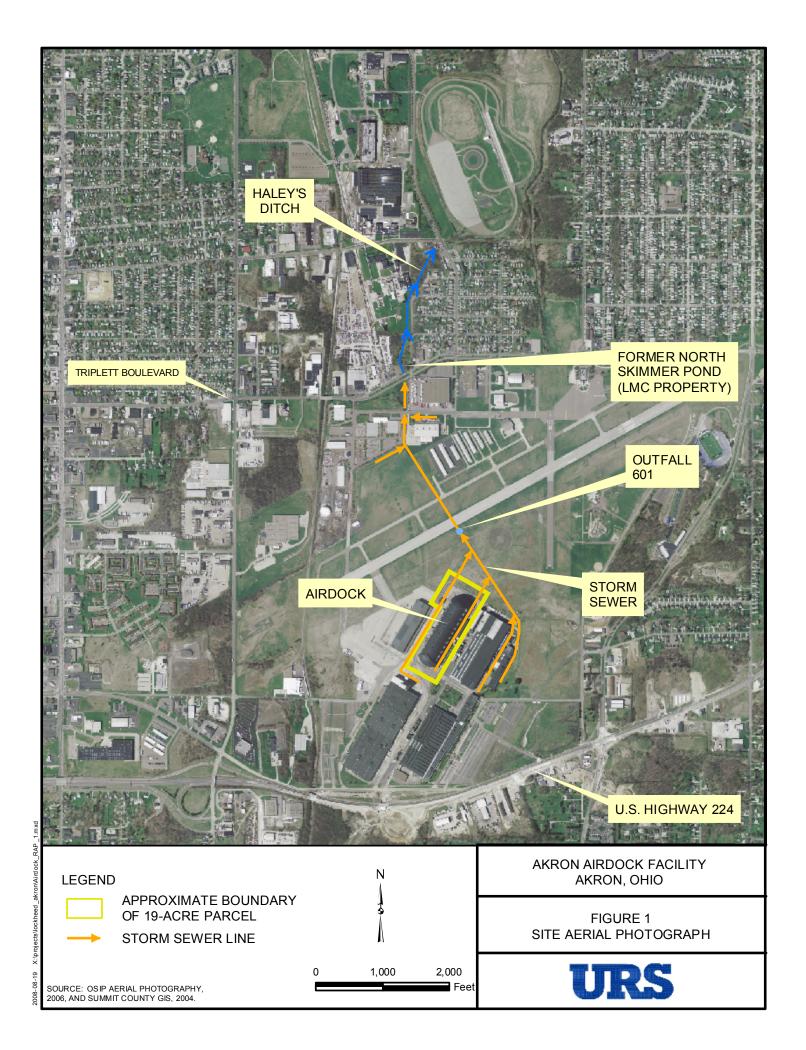
- Weight of Evidence
 - Complete Source Removal/Containment
 - BMPs in place; SWP3
 - Filters on catch basins
 - Limited unpaved areas
 - Modeling Exercise (Risk Assessment)
 - Post-remediation Stormwater Sampling & Analysis

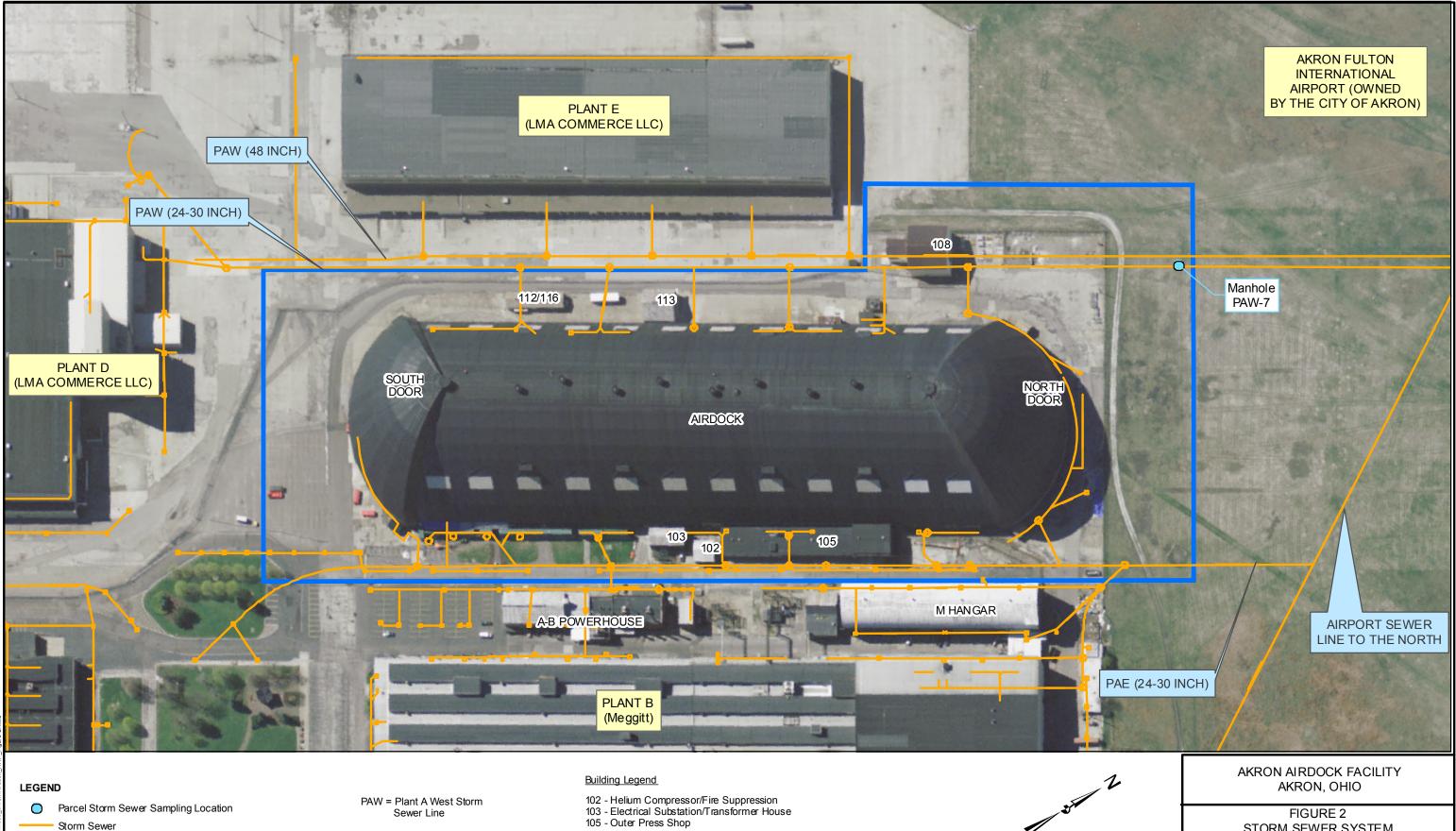
VAP Stormwater Sampling Plan



Sampling & Analysis Plan

- 3 stormwater sampling events during "measurable" rainfall
- Sample at downstream manhole at property boundary – MH-PAW7
- Analyze for Total PCBs including 1268 by EPA Method 8082, VAP certified lab
- 0.2 ug/L reporting limit
- Schedule following completion of storm drain debris removal activity (ongoing)





Parcel Storm Sewer Sampling Location

Storm Sewer

Approximate Airdock Boundary

Drainage Structure (Catch Basin or Manhole)

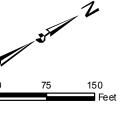
Sewer Line

PAE = Plant A East Storm Sewer Line

108 - Motor Run-In

112 - Former Flame Cutting
113 - Former Acid/Alkali Waste Storage Facility

116 - Storage



SOURCES: MODIFIED FROM SUMMIT COUNTY GIS, 2004 AND OSIP AERIAL PHOTOGRAPH, 2006

FIGURE 2 STORM SEWER SYSTEM WITH SAMPLING LOCATION

