

Cincinnati
11231 Cornell Park Drive
Cincinnati, Ohio 45242
513.489.2255
Fax 513.489.2533

Cleveland
1382 W. 9th Street
Suite 200
Cleveland, Ohio 44113
216.344.3072
Fax 216.344.3073

Chicago
325 West Huron Street
Suite 410
Chicago, Illinois 60610
312.475.9055
Fax 312.475.9059

800.229.1443
www.paynefirm.com



The Payne Firm, Inc.
Environmental Consultants

STATEMENT OF WORK #1

DATE: June 11, 2008

SUBJECT: Former Process Wastewater Sewer (AOI B) Investigation and Former Scrap Building Underground Storage Tank (AOI I) Integrity Test

PROJECT NO.: 0654.13.05

1. OBJECTIVES

This Statement of Work (SOW) identifies the first field task that will be undertaken as part of a September 13, 2007 Administrative Order of Consent (Order) between the United States Environmental Protection Agency (U.S. EPA) Region 5 and Bway.

This SOW involves two Areas of Interest (AOI) identified in the November 8, 2007 Current Conditions Report (CCR) recommended for further investigation: 1) a former process wastewater sewer line (AOI B) originating from the former process wastewater treatment area in the D&I building to the outfall location extending into the gravel pit adjacent to the property to the north; and 2) a 300-gallon fiberglass underground storage tank (UST) (AOI I) located in the former aluminum scrap handling building addition at the northwest corner of the facility.

2. FORMER PROCESS WASTEWATER SEWER LINE (AOI B)

A December 3, 1997 Baseline Environmental Assessment conducted by The Payne Firm, Inc. (Payne Firm) included a sewer line assessment that provided the basis for the understanding of the nature and anticipated flow paths for the former process sewer line. As described in Section 5.25.1 of the CCR, the 1997 sewer line investigation identified a 6-inch clay tile sewer line inlet observed to be pitted and eroded (Figure 1) at a manhole location along the storm sewer line running along and parallel to the western end of the facility. The inlet was observed to originate from the east in the general direction of the former wastewater treatment area of the D&I building. It is suggested that this inlet at the 15-inch concrete storm sewer was the discharge point for process wastewater originating from the former treatment unit in the D&I building.

The configuration of the former treatment unit is sketched in Figure 4-1 of the May 1986 (revised September 1986) Closure Plan for the Wastewater Treatment Unit and is included as Figure 2 of this SOW. Although the treatment unit no longer exists at the facility (the area is currently used for warehousing), concrete floor cuts are visible and may outline the prior configuration, potentially aiding in the understanding of the origination point of the process sewer line.

Investigation of the former process sewer line is intended to accomplish three primary goals:
1) confirm the origination of the suggested process sewer line at the former D&I building;

2) confirm the ultimate discharge point for the sewer line outfall beyond the northern property line at the gravel pit; and 3) identify locations along the sewer line where corrosion or cracks exists that represent a compromise of the pipe integrity allowing for a potential release to subsurface. Identification of any pipe defects will be used for targeted soil sampling in SOW 2 soil investigation. Figure 3 illustrates the entire facility sewer network and isolates the sewer segments targeted for this investigation.

A private utility locating service will be contracted to trace the sewer line using down-hole video surveillance equipment. The point of departure for accomplishing the stated goals above will be the storm sewer manhole location west of the facility that was identified and photographed in the 1997 sewer line investigation (Figure 1). The manhole will be opened and the video surveillance line will be run upstream (east) through the inlet of the 6-inch pipe towards the facility. To the extent possible, the equipment will video record the length of the sewer to its origination point. If the origination point cannot be opened or accessed from within the facility, total length will be recorded to approximately locate position. The origination point will then be matched to the former treatment unit configuration, if possible.

During the advancement of the surveillance equipment, pipe defects will be noted, recorded and measured by distance from the point of departure. After advancing the surveillance equipment upstream from the inlet point, the equipment will be retrieved and cleaned. The down-hole video surveillance equipment will then be advanced from the same point of departure downstream (north) through the 15-inch concrete storm sewer to its ultimate discharge point. Pipe defects again will be noted, recorded and measured from the point of departure, and flagged for potential future subsurface investigation in SOW #2.

3. FORMER SCRAP HANDLING BUILDING UST (AOI I)

As described in Section 5.32.1 of the CCR, the former aluminum scrap handling building addition houses a 300-gallon fiberglass UST that has been reportedly emptied, cleaned, and never closed. An attached sump has reportedly been filled with concrete. Since the tank's age and past contents and uses cannot be fully documented, a tank integrity test was recommended to determine the release potential of this tank to the subsurface.

A certified tank-test contractor will be retained to conduct a tank integrity assessment using two tests. First, a wet test will be conducted to confirm that the tank is empty, or to document the liquid volume of any remnant material within the tank if contents are found. Second, an ullage test will determine the integrity of the tank and associated system (fill ports, vents, etc.) to document whether this tank potentially may have released contents to the subsurface.

4. FIELD DOCUMENTATION

A field logbook will be used to record facts and circumstances of the investigations. Information recorded in the logbook/field form will include the following:

- Name of field personnel and contractors;
- Time and date;
- Weather conditions;
- Measurements and calculations; and
- Pertinent observations.



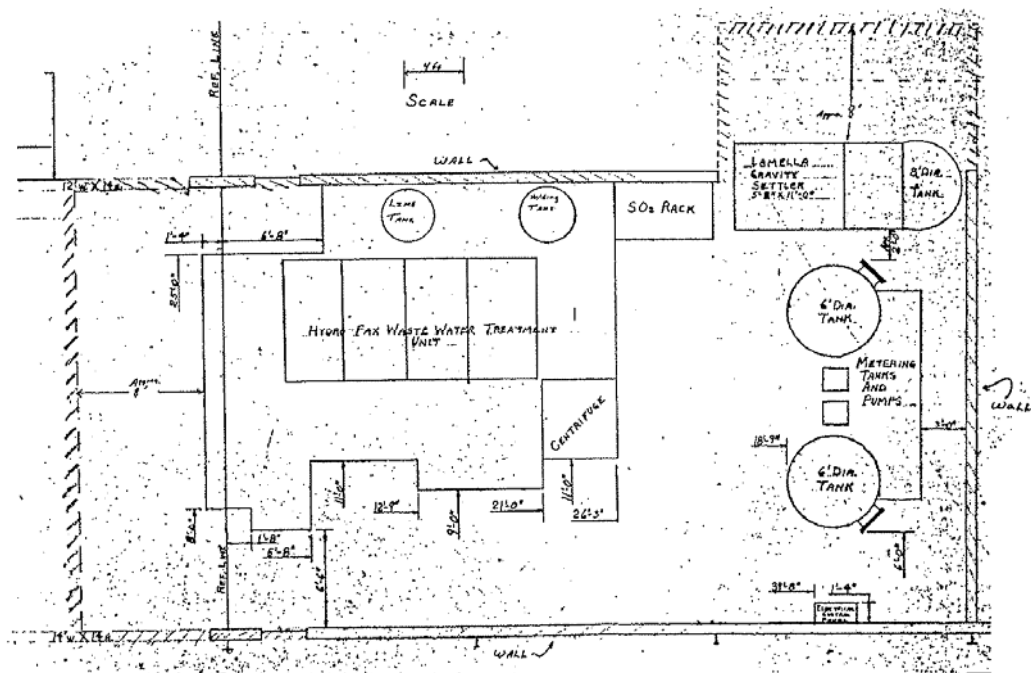
Figure 1. Suggested 6-inch former process waste sewer line inlet to 15-inch storm sewer.
(From Appendix I – Baseline Assessment Site Inspection Photographs, Baseline Environmental Assessment, Payne Firm, 1997).



Figure 2. Sketch of configuration of former wastewater treatment unit in D&I building addition.
 [From Figure 4-1 of the Closure Plan for the Wastewater Treatment Unit, Heekin Can Inc., May 1986 (revised September 1986)].

Figure 4-1 Sketch of Waste Water Treatment Unit
 and Associated Equipment

(Hash marks delineate boundary of area to be washed and rinsed).



DRAFT-WORK IN PROGRESS
Privileged and Confidential
Prepared at the Request of BWAY

MARTIN MARIETTA

MARTIN MARIETTA

Manhole with identified
6-inch pipe inlet to 15-inch
storm sewer

Suggested 6-inch process
waste water sewer line

Former Waste Water
Treatment Unit

LEGEND

- Storm sewer lines identified in 1997
- Sanitary sewer lines identified in 1997
- Sewer Line Targeted for Investigation
- BWAY property boundary
- Manhole Locations

BWAY Facility Building Additions

- A - D&I Addition
- B - D&I Office
- C - D&I Coil Storage
- D - D&I Building
- E - Warehouse
- F - Warehouse Addition
- G - Original Manufacturing Bldg.
- O - Scrap Handling Addition

0 75 150 225 300 375 450 525 600 675 750 825 900 975 1,050

1" = 75'



G:\GIS_Projects\GIS_0654.13.00_Bwey_CAWXDS\RF\SOW1.mxd

PROJECT

FIGURE NO. 3

DATE 6/10/08

DRAWN BY MDB

REQUESTED BY KDK

PROJECT NO. 654.13.02

TITLE

BWAY - RCRA Corrective Action

SOW #1 - Former Process Waste Water Sewer Line (AOI B) Investigation

REFERENCE

2006 Orthophoto Courtesy CAGIS, 1998 Payne Firm Baseline Environmental Assessment (BEA) Appendix III: Summary of Sewer Network

The Payne Firm, Inc.
Environmental Consultants
Cincinnati / Cleveland / Chicago