Department of Environmental Conservation

Division of Environmental Remediation

Record of Decision

Pass and Seymour Site
City of Glen Cove, Nassau County
New York
Site Number 130053A

March 2008

New York State Department of Environmental Conservation
DAVID A. PATERSON, *Governor* ALEXANDER B. GRANNIS, *Commissioner*

DECLARATION STATEMENT - RECORD OF DECISION

Pass and Seymour Inactive Hazardous Waste Disposal Site
City of Glen Cove, Nassau County, New York
Site No. 130053A

Statement of Purpose and Basis

The Record of Decision (ROD) presents the selected remedy for the Pass and Seymour site, a Class 2 inactive hazardous waste disposal site. The selected remedial program was chosen in accordance with the New York State Environmental Conservation Law and is not inconsistent with the National Oil and Hazardous Substances Pollution Contingency Plan of March 8, 1990 (40CFR300), as amended.

This decision is based on the Administrative Record of the New York State Department of Environmental Conservation (the Department) for the Pass and Seymour inactive hazardous waste disposal site, and the public's input to the Proposed Remedial Action Plan (PRAP) presented by the Department. A listing of the documents included as a part of the Administrative Record is included in Appendix B of the ROD.

Assessment of the Site

Actual or threatened release of hazardous waste constituents from this site have been addressed by implementing the interim remedial measure (IRM) identified in this ROD. The installation and operation of an Air Sparging/Soil Vapor Extraction (AS/SVE) site has significantly reduced the threat to public health and the environment. Based upon the implementation of the IRM, the findings of the investigation of this site indicate that the site no longer poses a significant threat to human health or the environment; therefore, No Further Action with continued operation of the IRM and (a) continued evaluation of the potential for vapor intrusion for any buildings developed or existing buildings re-occupied on the site, including provision for mitigation of any impacts identified; (b) monitoring of on-site and downgradient groundwater; (c) identification of any use restrictions on the site; and (d) provisions for the continued proper operation and maintenance of the components of the remedy, has been selected as the remedy for this site.

Description of Selected Remedy

Based on the results of the Remedial Investigation and Feasibility Study (RI/FS) for the Pass and Seymour site and the criteria identified for evaluation of alternatives, the Department has selected No Further Action with continued operation of the AS/SVE IRM. The components of the remedy are as follows:

1. Installation of eleven air sparging and nine soil vapor extraction wells with ancillary equipment.

2. Imposition of an institutional control in the form of an environmental easement that will require (a) limiting the use and development of the property to industrial use; (b) compliance with the approved site management plan; (c) restricting the use of groundwater as a source of potable or process water, without necessary water quality treatment as determined by NYSDOH; and (d) the property owner to complete and submit to the Department a periodic certification of institutional and engineering controls.

3. Development of a site management plan which will include the following institutional and engineering controls: (a) continued evaluation of the potential for vapor intrusion for any buildings developed or existing buildings re-occupied on the site, including provision for mitigation of any impacts identified; (b) monitoring of on-site and downgradient groundwater and any associated soil vapor; (c) identification of any use restrictions on the site; and (d) provisions for the continued proper operation and maintenance of the components of the remedy.

4. The property owner will provide a periodic certification of institutional and engineering controls, prepared and submitted by a professional engineer or such other expert acceptable to the Department, until the Department notifies the property owner in writing that this certification is no longer needed. This submittal will: (a) contain certification that the institutional controls and engineering controls put in place are still in place and are either unchanged from the previous certification or are compliant with Department-approved modifications; (b) allow the Department access to the site; and (c) state that nothing has occurred that will impair the ability of the control to protect public health or the environment, or constitute a violation or failure to comply with the site management plan unless otherwise approved by the Department.

5. The operation of the components of the IRM remedy will continue until the remedial objectives have been achieved, or until the Department determines that continued operation is technically impracticable or not feasible.

New York State Department of Health Acceptance

The New York State Department of Health (NYSDOH) concurs that the remedy selected for this site is protective of human health.

Declaration

The selected remedy is protective of human health and the environment, complies with State and Federal requirements that are legally applicable or relevant and appropriate to the remedial action to the extent practicable, and is cost effective. This remedy utilizes permanent solutions and alternative treatment or resource recovery technologies, to the maximum extent practicable, and satisfies the preference for remedies that reduce toxicity, mobility, or volume as a principal element.

MAR 31 2008

Date

Dale A. Desnoyers, Director
Division of Environmental Remediation

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RECORD OF DECISION

Pass and Seymour Site
City of Glen Cove, Nassau County, New York
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SECTION 1: SUMMARY OF THE RECORD OF DECISION

The New York State Department of Environmental Conservation (the Department), in consultation with the New York State Department of Health (NYSDOH), has selected a remedy for the Pass and Seymour site. As more fully described in Sections 3 and 5 of this document, the manufacture of electrical wiring devices resulted in the disposal of hazardous wastes, including VOCs, primarily tetrachloroethene (PCE). These wastes contaminated the soils and groundwater at the site, and resulted in:

- a significant threat to human health associated with exposure to contaminated groundwater
- a significant environmental threat associated with the current impacts of contaminants to groundwater in a sole source aquifer

During the course of the investigation certain actions, known as interim remedial measures (IRMs), were undertaken at the Pass and Seymour site in response to the threats identified above. An IRM is conducted at a site when a source of contamination or exposure pathway can be effectively addressed before completion of the remedial investigation/feasibility study (RI/FS). The IRM undertaken at this site included installation and operation of an air sparging/soil vapor extraction (AS/SVE) system.

Based upon the implementation of the above IRM, the findings of the investigation of this site indicate that the site no longer poses a significant threat to human health or the environment; therefore, No Further Action with continued operation of the IRM and (a) continued evaluation of the potential for vapor intrusion for any buildings developed or existing buildings re-occupied on the site, including provision for mitigation of any impacts identified; (b) monitoring of on-site and downgradient groundwater; (c) identification of any use restrictions on the site; and (d) provisions for the continued proper operation and maintenance of the components of the remedy, has been selected as the remedy for this site.

The selected remedy, discussed in detail in Section 8, is intended to attain the remediation goals identified for this site in Section 6. The remedy must conform with officially promulgated standards and criteria that are directly applicable or that are relevant and appropriate. The selection of a remedy must also take into consideration guidance, as appropriate. Standards, criteria and guidance are hereafter called SCGs.

SECTION 2: SITE LOCATION AND DESCRIPTION

The Pass and Seymour site is located at 45 Sea Cliff Avenue in the City of Glen Cove, in Nassau County. Figure 1 shows the site location. The site is about 7.5 acres in areal extent. The site is bounded by Sea Cliff Avenue to the north; the Photocircuits Corporation, Site No. 130009, site to the east; the Glen Head Country Club to the south and the Tweezerman property to the west. The site is located in an urban/industrial area of Nassau County. The Glen Cove Creek flows to the north along the east side of the site. Most of the site is paved and contains several industrial buildings. Pass and Seymour is one of several properties that comprise the Sea Cliff Avenue Industrial Area. Figure 2 shows the site features.

The Pass and Seymour site is underlain by the following soil layers in descending order: the Upper Glacial Aquifer, the Port Washington confining unit, the Port Washington aquifer, the Lloyd Aquifer, and bedrock. The Upper Glacial Aquifer is composed of stratified beds of fine to coarse sand and gravel with some lenses of silt and clay and extends to a depth of about 200 feet (ft) below ground surface (bgs). The Port Washington confining unit, which extends about 100 ft below the Upper Glacial Aquifer, consists of silt and clay with some sand and gravel lenses. The Port Washington aquifer is composed of sand and gravel with variable amounts of clay and silt, and is about 50 ft thick. The Lloyd Aquifer, which is about 200 ft thick, consists of discontinuous layers of gravel, sand, sandy clay, silt, and clay. It roughly parallels the crystalline bedrock, which is present at a depth of about 550 ft bgs. Groundwater is present at 4 to 10 ft bgs. Groundwater flow is generally north-northwest.

SECTION 3: SITE HISTORY

3.1: Operational/Disposal History

The main buildings on the site were constructed in 1959, when Slater Electric began operations on the site. In 1988, the property was purchased by Pass and Seymour, who manufactured electric components using an injection molding process. This operation used PCE as a degreasing solvent. PCE was stored in an above ground storage tank on the west side of Building 7 (Figure 2). It is likely that PCE was spilled from the tank and entered the soil beneath the building through floor drains because it appears the contaminant source area is largely confined to the footprint of Building 7.

3.2: Remedial History

In May 1996, the Department listed the site as a Class 2 site in the Registry of Inactive Hazardous Waste Disposal Sites in New York. A Class 2 site is a site where hazardous waste presents a significant threat to the public health or the environment and action is required. The decision to list the site in the Registry was made, in part, on the basis of the March 1994 Preliminary Site Assessment which reported VOCs in groundwater above standards at the Pass and Seymour site.

Prior to the RI, a Source Area Investigation for the Sea Cliff Avenue Industrial Area was performed in 1992 and a Preliminary Site Investigation (PSI) was conducted on-site during August of 1996. The field activities and findings of these investigations are described in the Source Area

Investigation report, dated September 1992, and the Results of the Preliminary Site Investigation report, dated November 1996. These reports identified the area of the above ground PCE storage tank in Building 7 as the primary area of concern at the site.

SECTION 4: ENFORCEMENT STATUS

Potentially Responsible Parties (PRPs) are those who may be legally liable for contamination at a site. This may include past or present owners and operators, waste generators, and haulers.

The Department and the Photocircuits Corporation entered into a Consent Order Index No. W1-0713-94-12 on March 31, 1997. The Order obligates the responsible parties to implement a RI/FS remedial program. After the remedy is selected, the Department will approach the PRPs to implement the selected remedy under an Order on Consent.

SECTION 5: SITE CONTAMINATION

A remedial investigation/feasibility study (RI) has been conducted to evaluate the alternatives for addressing the significant threats to human health and the environment.

5.1: Summary of the Remedial Investigation

The purpose of the RI was to define the nature and extent of any contamination resulting from previous activities at the site. The RI was conducted between April and September of 1998. The field activities and findings of the investigation are described in the RI report.

The Remedial Investigation included the following tasks:

- Soil and groundwater sampling using Geoprobe® to delineate impacts detected during the PSI in the vicinity of the former solvent aboveground storage tank located in Building 7
- Installation of a groundwater monitoring well downgradient of Building 7
- Sampling of on-site groundwater monitoring wells
- Slug testing of on-site monitoring wells

Additional groundwater sampling was carried out in conjunction with the AS/SVE IRM. The information acquired is contained in the Quarterly Progress Reports for the Pass and Seymour site for the time period between the year 2000 and the year 2004.

5.1.1: Standards, Criteria, and Guidance (SCGs)

To determine whether the on-site soils and groundwater contain contamination at levels of concern, data from the investigation were compared to the following SCGs:

- Groundwater, drinking water, and surface water SCGs are based upon the Department's "Ambient Water Quality Standards and Guidance Values" and Part 5 of the New York State Sanitary Code.

- Soil SCGs are based upon the Department's Cleanup Objectives including "Technical and Administrative Guidance Memorandum [TAGM] 4046; Determination of Soil Cleanup Objectives and Cleanup Levels" and 6 NYCRR Subpart 375.6 - Remedial Program Soil Cleanup Objectives.

Based upon the results of the Source Area Investigation, the PSI and the RI, in comparison to the SCGs and potential public health and environmental exposure routes, certain media and areas of the site required remediation. These are summarized in Section 5.1.2. More complete information can be found in the Source Area Investigation report, the PSI report, the RI report and in the Quarterly Progress Reports.

5.1.2: Nature and Extent of Contamination

This section describes the findings of the investigation for all environmental media that were investigated.

As described in the RI report, many soil and groundwater samples were collected to characterize the nature and extent of contamination. As seen in Figure 3 and summarized in Table 1, the main categories of contaminants that exceed their SCGs are volatile organic compounds (VOCs), predominantly PCE. For comparison purposes, where applicable, SCGs are provided for each medium.

Chemical concentrations are reported in parts per billion (ppb) for water, and in parts per million (ppm) for soil.

Figure 3 and Table 1 summarize the degree of contamination for the contaminants of concern and compare the data with the SCGs for the site. The following are the media which were investigated and a summary of the findings of the investigation.

Subsurface Soil

Soil borings (labeled 45A-SB-boring no.) were advanced at three locations within Building 7 on the Pass and Seymour site (see Figure 3). The RI concentrated on the Building 7 area based upon the results of the 1996 PSI, which found soil contamination only in the vicinity of the PCE storage tank located on the west wall of Building 7. Two soil samples were collected from soil boring 45A-SB-31 and 45A-SB-32, and three soil samples were collected from boring 45A-SB-33. All samples were taken between 12 and 24 ft bgs. See Table 1 for analytical results. The soil sample taken from 45A-SB-33 at 12-16 ft bgs contained 2.5 ppm of PCE, as compared to the NYSDEC cleanup objective of 1.3 ppm. Photoionization detector (PID) readings from the screening of soil samples collected from borings 45A-SB-31, 45A-SB-32, and 45A-SB-33 ranged from 100 ppm to 2,166 ppm. While the PID screening is only semi-quantitative, it suggests that there was

substantially higher PCE concentration present in the unsaturated zone beneath Building 7 than was detected in the soil samples.

Subsurface soil contamination identified during the RI will be addressed by the AS/SVE IRM described in Section 5.2.

Groundwater

Groundwater samples were collected from four monitoring wells and seven groundwater grab sample locations. The monitoring well locations (labeled MW-well no.) and the grab sampling locations and results (labeled 45A-GW-location no.), are shown on Figure 3. The water table in the vicinity of Building 7 is about 10 ft bgs. All groundwater wells labeled S (e.g., MW 4S) are shallow, and are screened to between 15 and 20 ft bgs. For the three wells located in the southern portion of the site (MW-1S, 2S and 4S), VOC concentrations varied from 1.8 ppb to 340 ppb, with the predominant VOC being tetrachloroethene (PCE). Well 3S, located at the northern property boundary, had a total VOC concentration of 110 ppb, with tetrachloroethene (PCE) being the predominant VOC. The groundwater grab samples were taken between 12 and 28 ft bgs. The highest concentrations were detected in samples collected from within the building footprint; 45A-GW-2 and 45A-GW-3 had total VOC concentrations of 32,000 and 17,000 ppb respectively, with PCE being the predominant VOC. VOC concentrations in the samples collected around and downgradient of the building ranged from less than 10 ppb in 45A-GW-4, 5 and 6 to 130 ppb in 45A-GW-7. See Table 1 for a summary of the analytical results for monitoring well and grab samples. Coupled with the groundwater results from the PSI, these results indicate that there is a localized area of elevated concentrations of VOCs (predominantly PCE) in the groundwater underlying Building 7. The concentration gradient from under Building 7 to the area immediately downgradient indicates that the contaminant mass is largely confined to the footprint of the building.

Groundwater contamination identified during the RI will be addressed by the AS/SVE IRM described in Section 5.2.

5.2: Interim Remedial Measures

An interim remedial measure (IRM) is conducted at a site when a source of contamination or exposure pathway can be effectively addressed before completion of a RI/FS. An Air Sparging/Soil Vapor Extraction (AS/SVE) system was installed as an IRM in and around Building 7 during the Fall of 2000. The system consisted of seven air sparging and seven soil vapor extraction well pairs, four of which were installed beneath the building slab. Two 1,200-pound activated carbon adsorbers were attached in series to the blower outlet to treat recovered vapors. Air sparging wells were installed to a depth of about 40 ft bgs, and soil vapor extraction wells were screened from just beneath the building's slab foundation (about 3 ft bgs) for a 20-ft interval. See Figure 4 for the air sparging and soil vapor extraction well locations.

The SVE system was started on November 1, 2000. Because the initial contaminant concentrations were relatively high, the AS portion of the system was not started until March 28, 2001. Subsequently, in January 2002, groundwater samples were taken from monitoring well 4S

to determine the efficacy of the IRM. PCE was detected at 1,240 ppb. Based upon the sampling results, the AS/SVE system was expanded to the east side of Building 7 in February 2002. See Figure 4 for the new AS/SVE well locations.

The SVE portion of the system was started on the east side of Building 7 on May 8, 2002, and a sample of the total system effluent, prior to treatment was collected. PCE was detected at a concentration of 5.3 parts per million by volume (ppmv). Another effluent sample was collected, on June 26, 2002, and PCE was detected at 142 ppmv and TCE was detected at 2 ppmv. The AS portion of the system on the east side of Building 7 was started on December 11, 2002.

On May 1, 2003, the system was modified to also extract vapor from monitoring well MW-4S; the well was fitted with a cap and connected to the SVE portion of the system. The system was shut down, from June 23 to September 28, 2004, for the purpose of pulsing. During the pulsing shut down, four soil vapor samples using summa canisters (two samples from beneath the slab in Building 7 and one sample from under the pavement on the east and west sides of Building 7) were collected. The sampling results indicated that there was significant contaminant mass present in the vadose zone (predominantly PCE) beneath the building footprint in the area of the PCE storage tank. The system was re-started with the blower connected to SVE wells 5 and 7 (Figure 4). After restarting, system effluent contained 2.0 ppmv of PCE. Subsequently, on July 21, 2005, a sample of blower influent contained 1.2 ppmv.

To evaluate the effectiveness of the IRM, monitoring well 4S, located on the downgradient side of the building, was sampled 14 times between January 2002, and November 2006. PCE concentrations reached a high of 3,600 ppb in January 2003, by November of 2006, concentrations of PCE in monitoring well 4S were 35 ppb, and by April 2007, concentrations of PCE in well 4S had fallen to 30 ppb. In April 2007, a sample from monitoring well 3S, located on the north (downgradient) side of the property had no PCE, although 230 ppb of TCE was found. Based upon the sampling results for AS/SVE system effluent and downgradient groundwater, the IRM is effectively remediating the source area.

5.3: Summary of Human Exposure Pathways

This section describes the types of human exposures that may present added health risks to persons at or around the site. A more detailed discussion of the human exposure pathways can be found in Section 5.0 of the RI report.

An exposure pathway describes the means by which an individual may be exposed to contaminants originating from a site. An exposure pathway has five elements: [1] a contaminant source, [2] contaminant release and transport mechanisms, [3] a point of exposure, [4] a route of exposure, and [5] a receptor population.

The source of contamination is the location where contaminants were released to the environment (any waste disposal area or point of discharge). Contaminant release and transport mechanisms carry contaminants from the source to a point where people may be exposed. The exposure point is a location where actual or potential human contact with a contaminated medium may occur.

The route of exposure is the manner in which a contaminant actually enters or contacts the body (e.g., ingestion, inhalation, or direct contact). The receptor population is the people who are, or may be, exposed to contaminants at a point of exposure.

An exposure pathway is complete when all five elements of an exposure pathway exist. An exposure pathway is considered a potential pathway when one or more of the elements currently does not exist, but could in the future.

Contaminated groundwater at the site flows toward the inactive Carney Street well field. Since these public supply wells are not currently in service, this route of exposure is not a completed pathway. All public drinking water supply wells in the Glen Cove Water District are routinely sampled for volatile organic compounds [VOCs] and are required to meet Safe Drinking Water standards prior to distribution to the public. Groundwater is the sole source of drinking water in this community. Any future consideration to use the well field, or any individual well within the Carney Street Well field would require meeting drinking water standards prior to distribution for public consumption. Chlorinated VOCs can volatilize from contaminated groundwater into unsaturated soil pore spaces, creating a potential inhalation exposure from soil vapor intrusion. This is a potential exposure pathway for this site.

The portion of Glen Cove Creek that flows through the site is not known to be contaminated, however, sampling downstream has detected volatile organic compounds in the water. Direct contact with the downstream portion of Glen Cove Creek is a potential off-site exposure pathway because future workers or trespassers could come into contact with surface water.

5.4: Summary of Environmental Assessment

This section summarizes the assessment of existing and potential future environmental impacts presented by the site prior to the IRM. Environmental impacts include existing and potential future exposure pathways to fish and wildlife receptors, as well as damage to natural resources such as aquifers and wetlands.

The following environmental exposure pathways and ecological risks have been identified:

- The Glen Cove Creek runs along the eastern edge of the Pass and Seymour property. The creek is located approximately 200 ft cross-gradient from the contaminated area of the site. Samples from the creek on the downgradient end of the site did not contain elevated levels of contaminants. Further, sampling results from shallow groundwater monitoring wells located adjacent to the stream on the adjacent Photocircuits Corporation site, Site No. 130009, indicate total VOC levels of 38 ppb or less, indicating it is unlikely that recharge of the creek from groundwater would result in significant VOC contamination in the stream. Consequently, a viable exposure pathway to fish and wildlife receptors is not present.
- Site contamination has impacted the groundwater resource in the Upper Glacial Aquifer. This is a sole source aquifer which provides groundwater for private, public and industrial use in the area.

SECTION 6: SUMMARY OF THE REMEDIATION GOALS AND SELECTED REMEDY

Goals for the remedial program have been established through the remedy selection process stated in 6 NYCRR Part 375. At a minimum, the remedy selected must eliminate or mitigate all significant threats to public health and/or the environment presented by the hazardous wastes disposed at the site through the proper application of scientific and engineering principles.

Prior to the completion of the IRM described in Section 5.2, the remediation goals for this site were to eliminate or reduce to the extent practicable:

- the release of contaminants from soil into groundwater that may exceed groundwater quality standards;
- soil vapor intrusion into residential and/or commercial facilities both on-site and off-site;
- ingestion of groundwater impacted by the site that does not attain New York State drinking water standards as outlined in 10 NYCRR Part 5, Subpart 5-1; and
- off-site migration of groundwater that does not attain Department Class GA Ambient Water Quality Standards

Further, the remediation goals for the site included attaining to the extent practicable:

- ambient groundwater quality standards

The main SCGs applicable to this project are as follows:

- ambient groundwater quality standards

  Air Sparging and Soil Vapor Extraction performed during the IRM at contaminated on-site areas will prevent further contamination of groundwater beneath the site.

- Soil SCGs based upon the Department's Soil Cleanup Objectives

  Air Sparging and Soil Vapor Extraction performed during the IRM will remove contamination in soils and will address any soil vapor contamination.

The Department believes that the IRM has accomplished the remediation goals and satisfed the SCGs for the site provided that it continues to be operated and maintained in a manner consistent with the design.

Based on th results of the investigations at hte site, the IRM that has been performed, and the evaluation presented here, the Department has selected No Further Action with continued operation of the AS/SVE system and institutional controls restricting the usage of groundwater at the site as the preferred alternative for the site. The Department believes that this alternative will

be protective of human health and the environment and will satisfy all SCGs as described above. Overall protectiveness is achieved through meeting the remedial goals listed above.

Therefore, the Department concludes that No Further Action is needed other than operation, maintenance, monitoring, and institutional and engineering controls. The elements of the IRM already completed and the institutional and engineering controls which will be required are listed below:

- Installation of eleven air sparging and nine soil vapor extraction wells with ancillary equipment.

- Imposition of an institutional control in the form of an environmental easement that will require (a) limiting the use and development of the property to industrial use; (b) compliance with the approved site management plan; (c) restricting the use of groundwater as a source of potable or process water, without necessary water quality treatment as determined by NYSDOH; and (d) the property owner to complete and submit to the Department a periodic certification of institutional and engineering controls.

- Development of a site management plan which will include the following institutional and engineering controls: (a) continued evaluation of the potential for vapor intrusion for any buildings developed or existing buildings re-occupied on the site, including provision for mitigation of any impacts identified; (b) monitoring of on-site and downgradient groundwater and any associated soil vapor; (c) identification of any use restrictions on the site; and (d) provisions for the continued proper operation and maintenance of the components of the remedy.

- The property owner will provide a periodic certification of institutional and engineering controls, prepared and submitted by a professional engineer or such other expert acceptable to the Department, until the Department notifies the property owner in writing that this certification is no longer needed. This submittal will: (a) contain certification that the institutional controls and engineering controls put in place are still in place and are either unchanged from the previous certification or are compliant with Department-approved modifications; (b) allow the Department access to the site; and (c) state that nothing has occurred that will impair the ability of the control to protect public health or the environment, or constitute a violation or failure to comply with the site management plan unless otherwise approved by the Department.

- The operation of the components of the IRM remedy will continue until the remedial objectives have been achieved, or until the Department determines that continued operation is technically impracticable or not feasible.

SECTION 7: HIGHLIGHTS OF COMMUNITY PARTICIPATION

As part of the remedial investigation process, a number of Citizen Participation activities were undertaken to inform and educate the public about conditions at the site and the potential remedial alternatives. The following public participation activities were conducted for the site:

- Repositories for documents pertaining to the site were established.
- A public contact list, which included nearby property owners, elected officials, local media and other interested parties, was established.
- A public meeting was held on February 28, 2008 to present and receive comment on the PRAP.
- The period during which the public comments on the PRAP were received was February 19, 2008 through March 20, 2008.
- A responsiveness summary (Appendix A) was prepared to address the comments received during the public comment period for the PRAP.

TABLE 1
Nature and Extent of Contamination
April 1998 - April 2007

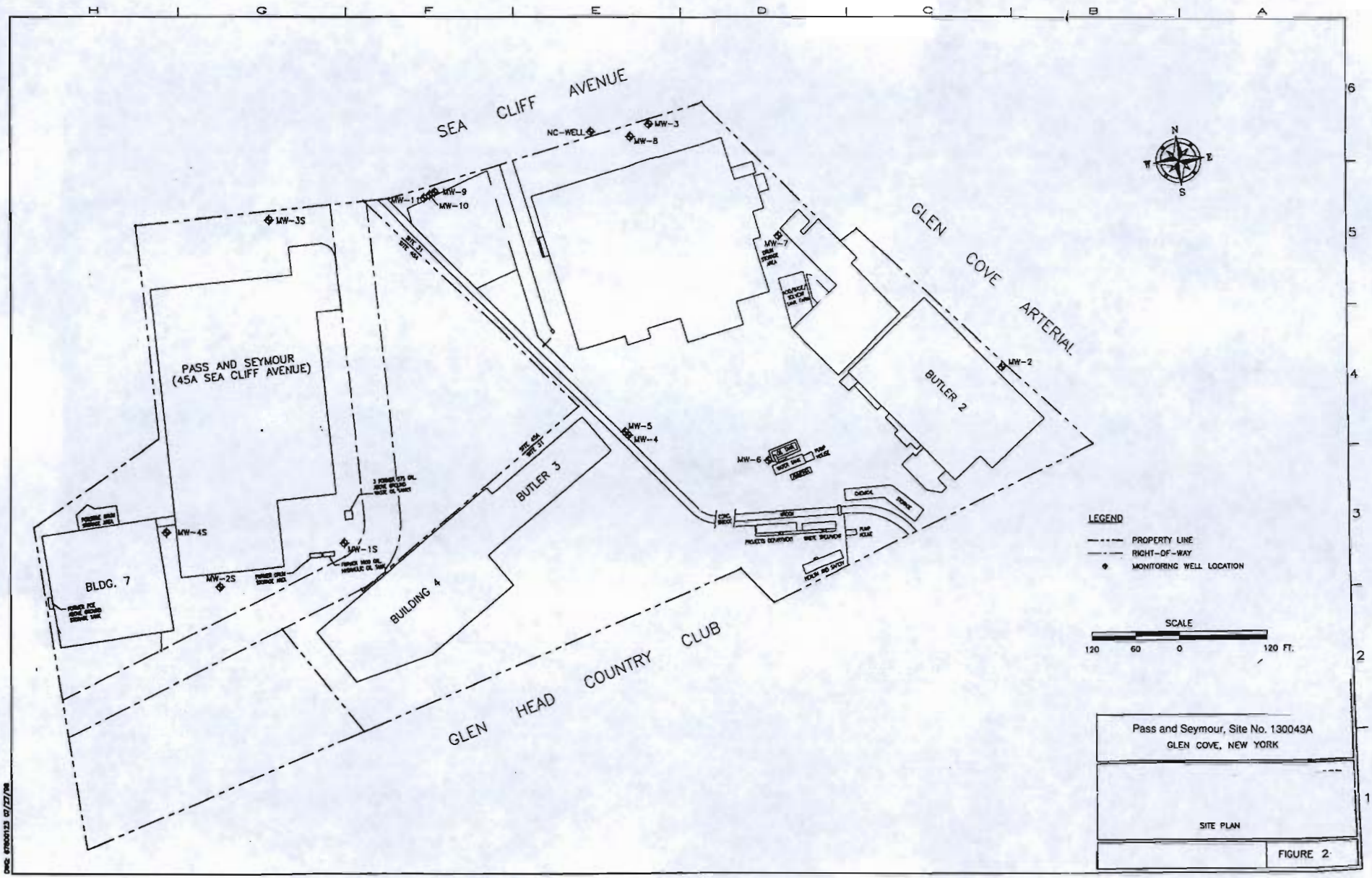
SUBSURFACE SOIL April 1998	Contaminants of Concern	Concentration Range Detected (ppm)[a]	SCG[b] (ppm)[a]	Frequency of Exceeding SCG
Volatile Organic Compounds (VOCs)	Tetrachloroethene	0.01 - 2.5	1.3	1 of 7
	Toluene	0 - 0.022	0.7	0 of 7
	Trichloroethene	0 - 0.021	0.47	0 of 7

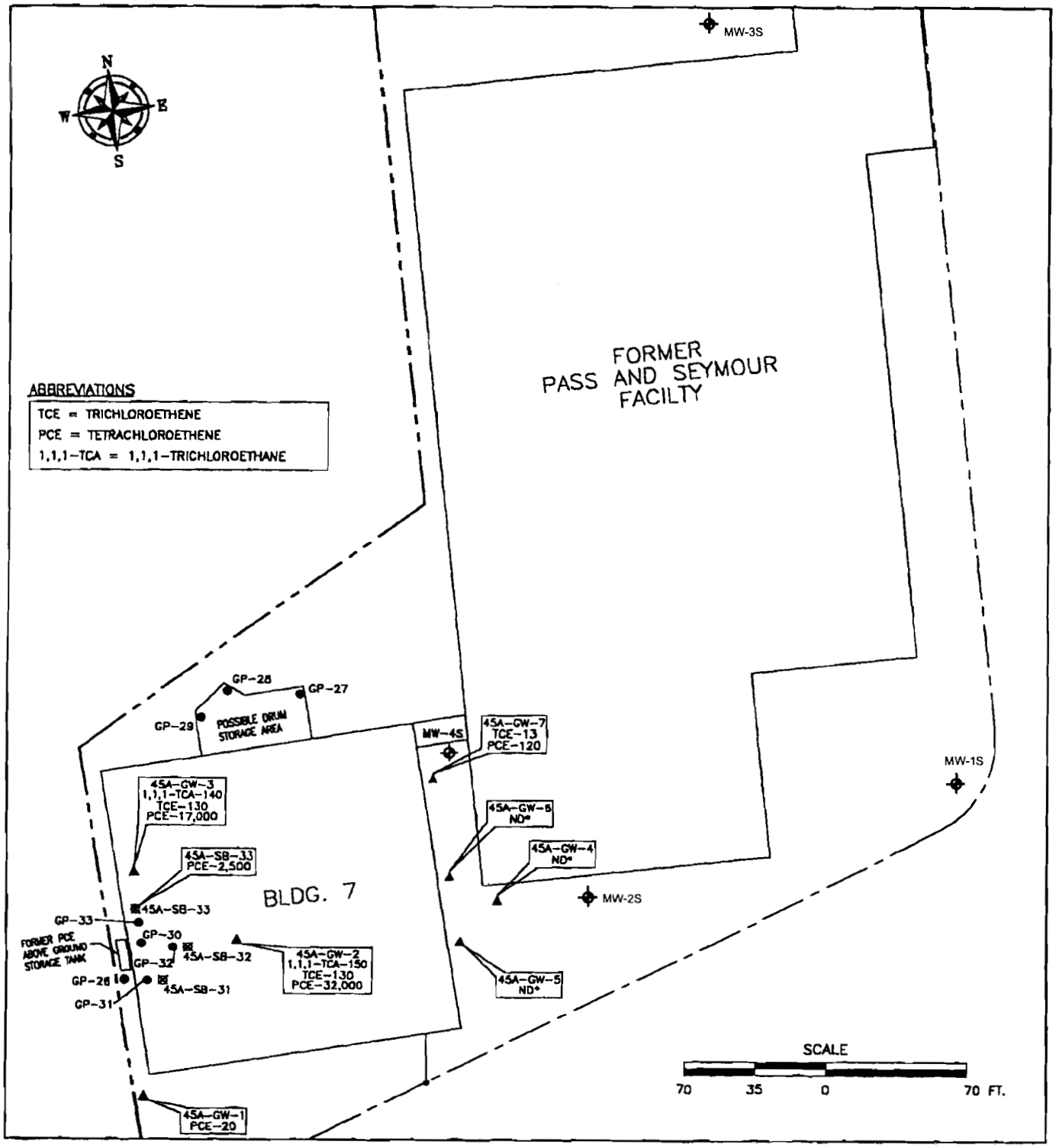
GROUNDWATER Well Samples May 1998	Contaminants of Concern	Concentration Range Detected (ppb)[a]	SCG[b] (ppb)[a]	Frequency of Exceeding SCG
Volatile Organic Compounds (VOCs)	Tetrachloroethene	1 - 330	5	4 of 5
	Trichloroethene	1-100	5	3 of 5

GROUNDWATER (Well 4S)	Contaminant of Concern	Concentration Detected (ppb)[a]	SCG[b] (ppb)[a]	Frequency of Exceeding SCG
January 2002	Tetrachloroethene	1240	5	1 of 1
April 2002	Tetrachloroethene	1910	5	1 of 1
June 2002	Tetrachloroethene	2200	5	1 of 1
October 2002	Tetrachloroethene	2510	5	1 of 1
January 2003	Tetrachloroethene	3600	5	1 of 1
April 2003	Tetrachloroethene	1420	5	1 of 1
August 2003	Tetrachloroethene	118	5	1 of 1
December 2003	Tetrachloroethene	180	5	1 of 1
March 2004	Tetrachloroethene	83	5	1 of 1
June 2004	Tetrachloroethene	29	5	1 of 1
September 2004	Tetrachloroethene	10	5	1 of 1
December 2004	Tetrachloroethene	110	5	1 of 1
July 2005	Tetrachloroethene	47	5	1 of 1
November 2006	Tetrachloroethene	35	5	1 of 1
April 2007	Tetrachloroethene	30	5	1 of 1

[a] ppb = parts per billion, which is equivalent to micrograms per liter, ug/L, in water
ppm = parts per million, which is equivalent to milligrams per kilogram, mg/kg, in soil
[b] SCG = standards, criteria, and guidance values

Figure 1
Site Location


SEA CLIFF AVENUE
GLEN COVE ARTERIAL
GLEN HEAD COUNTRY CLUB
PASS AND SEYMOUR
(45A SEA CLIFF AVENUE)
BLDG. 7
BUILDING 4
BUTLER 3
BUTLER 2
NC-WELL
MW-1S
MW-2S
MW-3S
MW-4S
MW-1
MW-2
MW-3
MW-4
MW-5
MW-6
MW-7
MW-8
MW-9
MW-10
LEGEND
PROPERTY LINE
RIGHT-OF-WAY
MONITORING WELL LOCATION
SCALE
120 60 0 120 FT.
Pass and Seymour, Site No. 130043A
GLEN COVE, NEW YORK
SITE PLAN
FIGURE 2



LEGEND

- PROPERTY LINE
- RIGHT-OF-WAY
- ● SAMPLING LOCATION (1996)
- ▲ GROUNDWATER GRAB SAMPLE LOCATION (1998)
- ◆ MONITORING WELL LOCATION
- ▣ SOIL SAMPLE LOCATION (1998)

ND* NO ANALYTES DETECTED IN EXCESS OF NYSDEC CRITERIA

NOTE: ALL RESULTS REPORTED IN PARTS PER BILLION (ppb)

DWG: 87800119 07/28/98

FIGURE 3

SOIL AND GROUNDWATER SAMPLING RESULTS

PASS AND SEYMOUR, SITE NO. 130053A

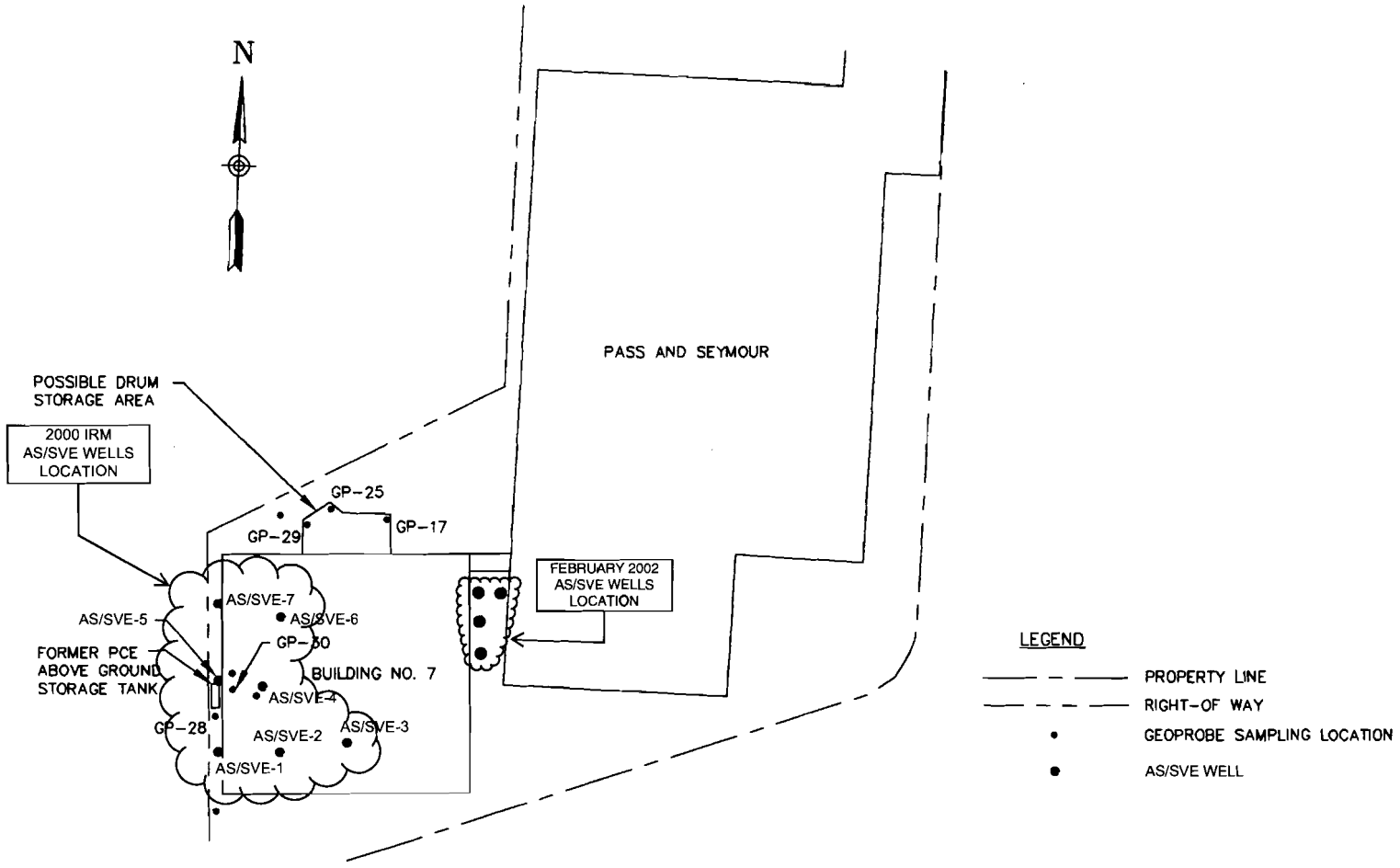


FIGURE 4

AIR SPARGE/SOIL VAPOR EXTRACTION WELL LOCATIONS

PASS AND SEYMOUR, SITE NO. 130053A

APPENDIX A

Responsiveness Summary

RESPONSIVENESS SUMMARY

Pass and Seymour Site
City of Glen Cove, Nassau County, New York
Site No. 130053A

The Proposed Remedial Action Plan (PRAP) for the Pass and Seymour site was prepared by the New York State Department of Environmental Conservation (the Department) in consultation with the New York State Department of Health (NYSDOH) and was issued to the document repositories on February 19, 2008. The PRAP outlined the remedial measure proposed for the contaminated soil and groundwater at the Pass and Seymour site.

The release of the PRAP was announced by sending a notice to the public contact list, informing the public of the opportunity to comment on the proposed remedy.

A public meeting was held on February 28, 2008, which included a presentation of the Remedial Investigation (RI) and the Feasibility Study (FS) as well as a discussion of the proposed remedy. The meeting provided an opportunity for citizens to discuss their concerns, ask questions and comment on the proposed remedy. These comments have become part of the Administrative Record for this site. The public comment period for the PRAP ended on March 20, 2008.

This responsiveness summary responds to all questions and comments raised during the public comment period. The following are the comments received, with the Department's responses:

COMMENT 1: How was this meeting (the February 28, 2008 PRAP meeting) advertised? There are few people attending.

RESPONSE 1: A public contact list, which included nearby property owners, elected officials, local media and other interested parties was established prior to the meeting. A meeting notice was sent to this contact list. In addition, a meeting notice was placed in Newsday, a local newspaper.

COMMENT 2: Who is presently operating the AS/SVE system?

RESPONSE 2: The AS/SVE system is currently being operated by Barton and Loguidice, a consulting firm working for Photocircuits and Photocircuits' successor company.

COMMENT 3: How long should the AS/SVE system continue to run?

RESPONSE 3: The AS/SVE system will continue to run until either the remedial goals are met or until the Department determines that the system is no longer useful in meeting the remedial goals. These determinations are made in the basis of the results of the groundwater and soil vapor monitoring carried out under the site management plan and the contaminant removal rates recorded for the

AS/SVE system. Typically, the system would be run for an additional year from the present.

COMMENT 4: Given the success of the IRM, is the site still a Class 2 site? What is needed to change the site from a Class 2 site?

RESPONSE 4: The site is currently a Class 2 site. In order to be reclassified as a Class 4 site, the remediation of the site must be substantially complete, but require further monitoring and/or maintenance. The Department will determine when monitoring results indicate that remediation is substantially complete.

COMMENT 5: Is remediation still underway at Photocircuits? Will additional remediation take place?

RESPONSE 5: Currently, the hydraulic restraint system at the Photocircuits site is operating. Additional remediation at the Photocircuits site will be undertaken after the issuance of a Record of Decision for the Photocircuits site, either, after negotiation of an Order on Consent, by the Responsible Party, or by the State utilizing superfund monies. It is anticipated that the additional work will begin in 2009 at the earliest.

COMMENT 6: Does Pass and Seymour still own the property?

RESPONSE 6: No. The current owner is GCP LLC.

COMMENT 7: Is the responsible party for the Pass and Seymour site the same entity as the responsible party for the Photocircuits site?

RESPONSE 7: Yes, the sites have the same responsible party and are currently under the same ownership.

COMMENT 8: Is the current owner liable for the clean-up of the Pass and Seymour property? Does clean mean getting to a Class 5?

RESPONSE 8: The current owner is responsible for the cleanup of the Pass and Seymour property. A Class 5 site is a site that has been properly closed in a setting where a consequential amount of hazardous waste constituents remain, but do not require continued operation, maintenance and/or monitoring. The Department does not anticipate that the Pass and Seymour site will be reclassified as a Class 5 site. It is more likely that the site will eventually be reclassified as a Class 4 site, as described in Response 5.

COMMENT 9: You mentioned deep groundwater sampling. What does that entail? If contamination is found in deep groundwater, what happens then?

RESPONSE 9: An investigation of deep and off-site groundwater for the Photocircuits and neighboring Pall sites is currently underway. Any contamination found in

this investigation will be addressed under Operable Unit 02 for the Photocircuits and Pall sites (deep and off-site groundwater).

COMMENT 10: What triggered the original investigation in 1998?

RESPONSE 10: The investigation was deemed necessary based on the results of the "Source Area Investigation, Sea Cliff Avenue, Glen Cove, NY," September 1992, prepared by H2M Group.

COMMENT 11: Is there any plan to reopen the Carney Street wells? Does Glen Cove need that well in the summer months?

RESPONSE 11: The City of Glen Cove currently has no plans to re-open the Carney Street wells. Before reopening the wells, a wellhead treatment system would need to be installed to remove contamination from the well-water. Currently, the City is able to meet its needs with the current production wells.

COMMENT 12: What happens after Pass and Seymour ROD is signed?

RESPONSE 12: After the ROD is signed, an Order on Consent will be negotiated between the Department and the PRP for the implementation of the Selected Remedy as described in this ROD. If an Order on Consent cannot be negotiated, implementation of the ROD will be carried out with State Superfund money.

Andrew J. Barber of Barton and Loguidice, P.C. submitted a letter (dated March 17, 2008) which included the following comments:

COMMENT 13: Selection of Proposed Remedy
We are in general concurrence with the No Further Action (NFA) decision by NYSDEC. We recognize that there are areas of residual impact where groundwater does not meet drinking water standards, and that NYSDEC/NYSDOH has concerns regarding the potential for soil- vapor intrusion in the areas underlain by these impacts. The best way to address these concerns is through continued monitoring of groundwater and soil vapor, as well as continued operation of the system installed as part of the Interim Remedial Measure (IRM). We look forward to developing the site management plan (described in the PRAP) to implement these measures, and to establish criteria for remediation endpoints.

RESPONSE 13: The Department looks forward to working with you on these issues.

COMMENT 14: Proposed Land-Use Restrictions
The PRAP proposes imposition of institutional controls ("limiting the use and development of the property to industrial") for the property in the future. We believe that imposition of possible restrictions is premature; if future data collection efforts demonstrate the need for some form of restrictions, we believe that they should be limited in both duration and area. As discussed above, we recognize that there are areas where groundwater does not meet

drinking water standards, and the concerns related to potential soil vapor intrusion in these areas. However, large portions of the property are not underlain by site-related groundwatercontamination and have been used for historically "clean" activities such as product storage, offices and parking. By placing restrictions on "the property", needless restrictions are placed on these unaffected portions of the property. Further, other than limited sub-slab testing in a portion of Building 7 (where remediation was subsequently employed), sub-slab vapor testing has not been conducted over the area where the groundwater impacts may exist; the possible imposition of institutional controls prior to establishing the existence of soil vapor intrusion is inherently unfair and unnecessary.

In the event that significant health hazards are shown to exist (following soil vapor testing), we recommend that the definition of "the site" for the purposes of 6 NYCRR Part 375 be changed from its current designation (which includes all of the property located at 45A Sea Cliff Avenue) to just the portion of the site that may be underlain by impacted groundwater. We also request that to the extent any institutional controls are applied to the property or any portion of the property, that the legal instrument for implementing the controls have a simple mechanism for removing the controls in the event that one or both of the following conditions exists: 1) sufficient data from soil vapor monitoring demonstrates that the subject areas meet commercial or residential cleanup criteria either due to natural attenuation or following additional soil vapor extraction; or 2) a proposed future development plan for the property specifically incorporates soil vapor intrusion mitigation measures (e.g. — installation of vapor intrusion barriers, placement of covering soils) acceptable to NYSDEC and NYSDOH.

RESPONSE 14: The Department does not have sufficient information at this time to delineate areas of the site which do not require institutional controls restricting future use. For instance, as you note, sub-slab vapor testing has not been conducted over the area where the groundwater impacts may exist. Further, there currently exists no administrative partition of the site which would enable the Department to exempt specific areas of the site from institutional controls. After the Record of Decision is finalized, the site owners may petition the Department to redifine the site boundaries as you suggest. In order to be successful, such a petition must clearly demonstrate that the areas no longer included in the site are in compliance with the SCGs.

APPENDIX B

Administrative Record

Administrative Record

Pass and Seymour Site
City of Glen Cove, Nassau County, New York
Site No. 130053A

1. Proposed Remedial Action Plan for the Pass and Seymour site, dated February 2008, prepared by the Department.

2. Order on Consent, Index No. W1-0713-94-12, between the Department and Photocircuits Corporation, executed on March 31, 1997.

3. "Source Area Investigation, Sea Cliff Industrial Area, Glen Cove, NY," September 1992, prepared by H2M Group

4. "Results of Preliminary Site Investigation, 31 and 45A Sea Cliff Avenue Properties", November 1996, prepared by McLaren Hart

5. "Remedial Investigation/Interim Remedial Measure Work Plan, Photocircuits Corporation, Glen Cove, New York," March 1997, prepared by McLaren Hart, Inc.

6. "Remedial Investigation Report, 31 and 45A Sea Cliff Avenue Sites, Photocircuits Corporation, Glen Cove, NY," September 1998, prepared by McLaren Hart, Inc.

7. "Work Plan 2000 for Remedial Investigation Completion, Interim Remedial Measure (IRM) Implementation and Feasibility Study (FS)," March 2000, prepared by Barton and Loguidice

8. Quarterly Progress Reports, Photocircuits Corporation, 2000 to 2004, prepared by Barton and Loguidice

9. "Interim Remedial Measures (IRM) Letter Report," December 18, 2006, prepared by Barton and Loguidice