New York State Department of Environmental Conservation

Division of Environmental Remediation

Remedial Bureau C, 11th Floor

625 Broadway, Albany, New York 12233-7014 Phone: (518) 402-9662 • Fax: (518) 402-9679

Website: www.dec.ny.gov



January 4, 2012

Mr. Bill Bosmann **AGFA** Corporation Environmental Health and Safety MS 100-3 100 Challenger Road Ridgefield Park, NJ 07660-2199

Dear Mr. Bosmann:

Re:

Site Management Plan Modification Site No. 152031 Peerless Photo Products EPA ID NYD002144139 (AGFA),

Shoreham, Suffolk Co.

As we discussed, based on our review of the sub slab vapor data presented in the June 2011 RCRA Facility Investigation Report and the history of the buildings at your facility, the New York State Department of Environmental Conservation (the Department) in consultation with the New York State Department of Health (DOH) has determined that a modification to Agfa's current Site Management Plan (SMP) is necessary to ensure the potential for soil vapor intrusion is properly addressed.

Please modify the SMP as described in the enclosure, and submit the new, modified SMP to this office for review and approval within thirty (30) days from receipt of this letter.

If you have any questions, please contact me at (518) 402-8801.

Paul Patel, P.E.

Environmental Engineer Remedial Section B

Remedial Bureau C

Division of Environmental Remediation

encl.

S. Karpinski, DOH cc:



Peerless Photo/Agfa SUFFOLK COUNTY, NEW YORK

Site Management Plan

NYSDEC Site Number: 152031

Prepared for:

PEERLESS PHOTO PRODUCTS SITE 4 RANDALL ROAD SHOREHAM, SUFFOLK COUNTY, NEW YORK

Prepared by:

EA ENGINEERING, P.C. and its affmate EA SCIENCE AND TECHNOLOGY THE MAPLE BUILDING 3 WASHINGTON CENTER

Revisions to Final Approved Site Management Plan:

Revision #	Submitted Date	Summary of Revision	DEC Approval Date
1		Revised to add SVI language	

JANUARY 2012

Site Management Plan Modification for Peerless Photo (Afga)

The existing Site Management Plan must be modified by placing the following language in Section 2.1, after bullet number (2):

(3) Sub-slab vapor has been detected at some locations under the existing buildings; therefore the potential for vapor intrusion must be evaluated for all existing buildings prior to being approved for occupancy and for any new buildings developed at the site noted on Figure 1 of Appendix E. Any potential impacts that are identified must be monitored or mitigated as directed by the Department. Mitigation will consist of a Sub-Slab Depressurization System(s), or a similar engineered system, to prevent the migration of vapors into the building(s) from soil and/or groundwater. Exceptions may be made for buildings where sufficient tests have been conducted, and reviewed and approved by the Department and NYSDOH, to assure tenants and owners that a sub-slab mitigation system is not needed, or continued monitoring is sufficient for the protection of human health.

Should long-term monitoring or mitigation be deemed necessary, this SMP will be modified to include provisions to assess the effectiveness of the remedy. The plan will be updated to include, but may not be limited to:

- a. A schedule of monitoring and frequency of submittals to the Department;
- b. monitoring for vapor intrusion for any buildings occupied or developed on the site, as may be required;
- c. maintaining site access controls and Department notification; and
- d. providing the Department access to the site and O&M records.