FPM group — Engineering and Environmental Science

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VIA OVERNIGHT COURIER

February 16, 2010

Mr. Dennis McChesney
Chief, Groundwater Compliance Section
US Environmental Protection Agency
290 Broadway, 20th Floor
New York, NY 10007-1866

Re: **UIC Closure Report**
I.W. Industries, Inc. Site
NYSDEC Registry # 1-52-102
FPM File No. 944-08-02

Dear Mr. McChesney:

We are hereby submitting this Underground Injection Control (UIC) Closure Report to document the abandonment and replacement of three stormwater leaching pools (Class V injection wells) at the above-referenced facility (Site). The work was performed in accordance with our June 23, 2008 UIC Closure Plan, as approved by the US Environmental Protection Agency (USEPA) on September 2, 2008. The layout of the pertinent Site features, including both the former and replacement leaching pools (LP-1, LP2, and LP-3), is shown in Figure 1 in Attachment 1. Detailed information concerning the Site history was included in the UIC Closure Plan; pertinent information relative to the UIC closure is summarized herein.

UIC Closure Summary

The closure of stormwater leaching pools LP-1, LP-2, and LP-3 was required by the New York State Department of Environmental Conservation (NYSDEC) for completion of remedial actions at the Site under the New York State Inactive Hazardous Waste Disposal Site remedial program. The previous owner of the Site, I.W. Industries, Inc., had initiated the remedial program for the Site under the oversight of the NYSDEC. Metro Assets III, LLC (Metro) subsequently purchased the Site under a U.S. Bankruptcy Court Order. Under this Court Order, Metro has continuing obligations with respect to the Site remedial program. Consequently, the NYSDEC issued an Order on Consent (Index #W1-0725-04-09) to Metro to complete the remedial program. The Order on Consent requires implementation of any required institutional and engineering controls, one of which was the abandonment of leaching pools LP-1 through LP-3. The completion of this requirement is documented herein.

As shown on Figure 1, leaching pools LP-1 and LP-2 were formerly situated southwest of the onsite building and received stormwater discharges from the southwest roof of the building. LP-1 was the primary structure and LP-2 was an overflow structure to LP-1. LP-3 was a slotted-cover leaching pool located to the west of a former interior loading dock. The former piping to this structure had been previously sealed and, at the time of abandonment, LP-3 received stormwater runoff from the parking lot. During the closure additional leaching pools (LP-1R, LP-2R and LP-3R) were installed to manage stormwater runoff previously directed to LP-1 through LP-3.

Abandonment and Replacement of LP-1 through LP-3

Abandonment of leaching pools LP-1 through LP-3 included verification of existing construction, design and installation of replacement stormwater leaching pools and piping, and backfilling and sealing of LP-1 through LP-3. The USEPA, NYSDEC, and Suffolk County Department of Health Services (SCDHS) were provided with one week's notice prior to field activities such that an observer could be present. FPM provided oversight of all construction activities on behalf of Metro.

Verification of Existing Construction

To confirm that LP-1 and LP-2 were connected solely to roof drainage piping for the front of the building and that LP-3 was no longer connected to any piping or additional structures, the structural design of these pools was evaluated. A drain-tracing contractor was engaged to survey and verify the layout of all of the piping connected to each of the targeted leaching pools and to assess whether overflow structures were present. Drain-tracing methods included flow and/or dye testing, snaking, radio-tracing, and geophysical methods (electromagnetic and ground-penetrating radar). This survey was also used to locate any subsurface utilities that might have been present in the areas targeted for work.

The survey was conducted on June 4, 2009 and was overseen by FPM. It was confirmed that LP-1 was connected to only one drainage pipe from the southwest corner of the building's roof. One drainage overflow pipe was observed connecting LP-1 to LP-2. No additional overflow pools were associated with either leaching pool and no additional piping was found.

No active drainage pipes were observed to be associated with LP-3. The drainage pipe connecting LP-3 to the former loading dock drain was observed; however, it was confirmed that this pipe was abandoned and sealed with grout. It was also observed that the former loading dock has been redeveloped as an office space and that no drains are present in this area. No overflow pools were observed to be associated with LP-3.

Subsurface utilities, including water service, natural gas service, and telephone service, were identified and marked such that replacement leaching pool locations could be selected to avoid these utilities. Replacement leaching pool locations were also selected to be away from the immediate vicinity of the leaching pools to be abandoned.

Design and Installation of Replacement Structures

The verified existing construction information was used to develop designs for the replacement of leaching pools LP-1 through LP-3. The designs were in accordance with local municipal requirements for stormwater management. The replacement leaching pools are designated as LP-1R through LP-3R and were designed as ten-foot-diameter perforated concrete leaching

structures ranging from 20 to 24 feet deep topped with manways and lids at grade, as required by the SCDHS. The planned and actual locations of each replacement pool and associated piping are shown on Figure 1. A profile showing the planned and actual construction of LP-1R through LP-3R is presented on Figure 2, included in Attachment 1.

Replacement stormwater leaching pools LP-1R through LP-3R were installed to the west of LP-2, as shown on Figure 1. The area where LP-1R and LP-2R were to be installed was excavated to approximately 24 feet below grade and the area of LP-3R was excavated to approximately 20 feet below grade. As the excavations commenced, the excavated soil was stockpiled, visually examined for indications of potential contamination, and then placed into the structures to be abandoned, as further described below. It should be noted that no visual indications of potential contamination (odors, staining) were noted on any of the excavated soils. The replacement structures were constructed as designed and the slotted concrete rings were wrapped with filter fabric prior to installation. The top of LP-1R was fitted with a 12-inch-thick reinforced concrete cover at a depth of approximately two feet below grade and a concrete chimney connected to a solid access cover at grade. The tops of LP-2R and LP-3R were each fitted with a reinforced concrete dome. A solid at-grade access cover was installed for LP-2R and a slotted at-grade access cover was installed for LP-3R. The existing roof drainpipe formerly connected to LP-1 was extended using 6-inch Standard Dimension Ratio (SDR) 35 pipe and connected to LP-1R. A 6-inch diameter SDR 35 overflow pipe was installed between LP-1R and LP-2R. The excavated areas surrounding LP-1R through LP-3R were backfilled with the stockpiled soil to grade and compacted. The exposed surface area was finished with several inches of recycled concrete aggregate (RCA) for stabilization. Copies of photos showing the work performed are included in Attachment 2.

The RCA covering the former and new leaching pools will be allowed to settle for several weeks such that the area may be properly repaved. Additional RCA will be added as necessary. We anticipate that the work area will be paved with asphalt in March/April 2010 when asphalt plants re-open. Final payment to the contractor is being withheld pending repaving.

Backfilling and Sealing of LP-1 through LP-3

To conduct the abandonment of LP-1 through LP-3, the concrete manways and domes of LP-1 through LP-3 were exposed by excavation and removed, and the existing piping was cut and removed from the immediate vicinity of the structures. As the excavations for the replacement leaching structures commenced (described above), the excavated and inspected soil was backfilled into the structures to be abandoned. Following backfilling, the top of each former leaching pool was sealed with a 12-inch thick reinforced concrete cover with a diameter corresponding to the diameter of each pool. The remaining exposed area above each concrete seal was backfilled with stockpiled soil and compacted. Several inches of RCA were added at grade for stabilization. Figure 3 in Attachment 1 shows the general abandonment and sealing procedures for LP-1 through LP-3.

The area of the sealed former leaching pools will be subject to inspection and annual certification, as detailed in the Site Management Plan (SMP) for this Site. Annual certifications will be provided to the NYSDEC in accordance with the SMP.

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Conclusions

The abandonment and replacement of former leaching pools LP-1 through LP-3, detailed in this report, completes the required UIC Closure activities for the Site. Please provide confirmation of the satisfactory completion of UIC Closure. Should you have any questions, please do not hesitate to call us at (631) 737-6200.

Sincerely,

John S. Bukoski
Hydrogeologist

Stephanie O. Davis
Senior Hydrogeologist
Department Manager

JSB/SOD:tac
Attachments

cc: Brian Jankauskas, NYSDEC w/attachments
John A. Jakub, Esq. w/attachments
Janet Gremli, SCDHS w/attachments

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ATTACHMENT 1

SITE PLAN AND CONSTRUCTION DIAGRAMS

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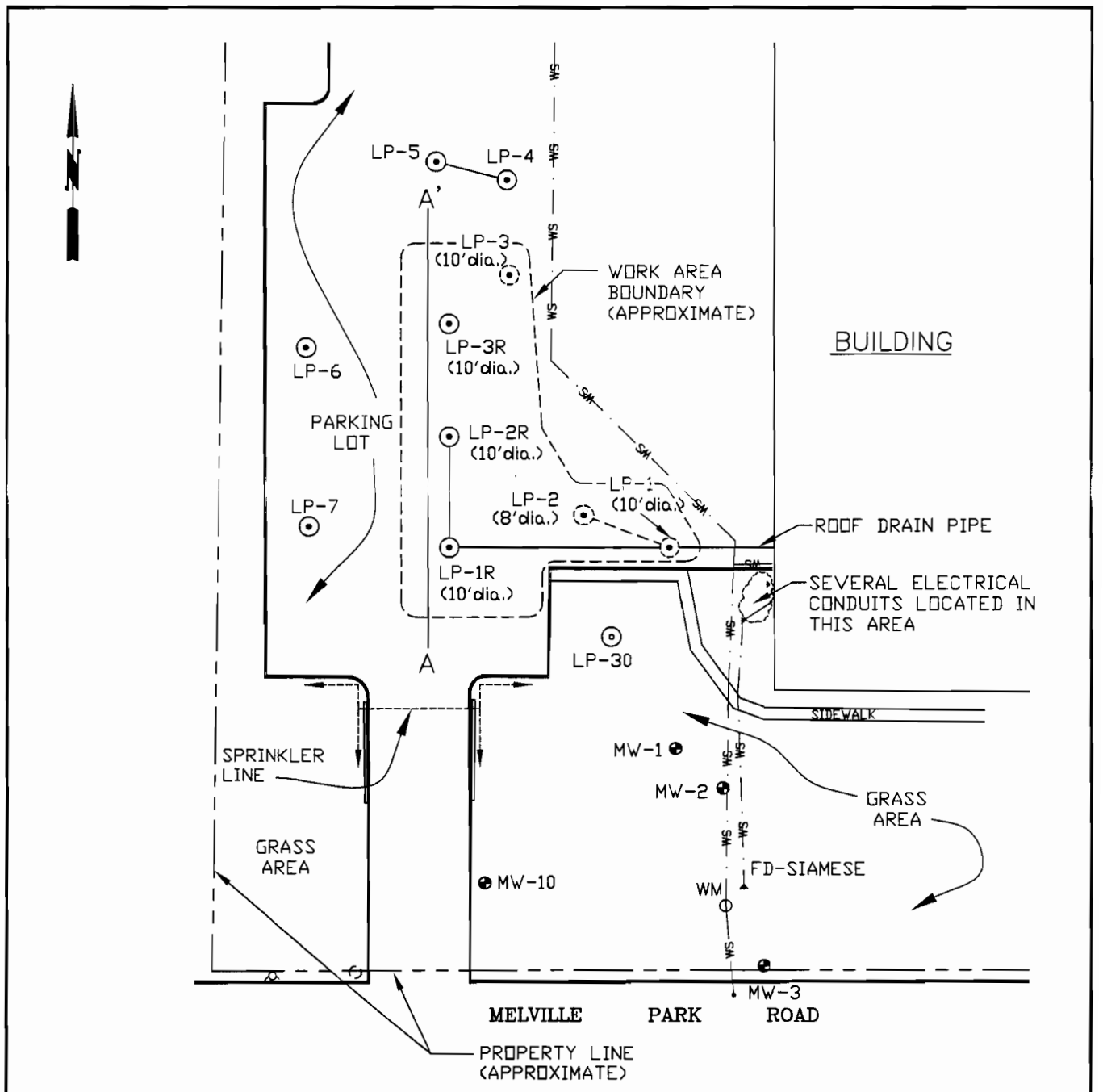
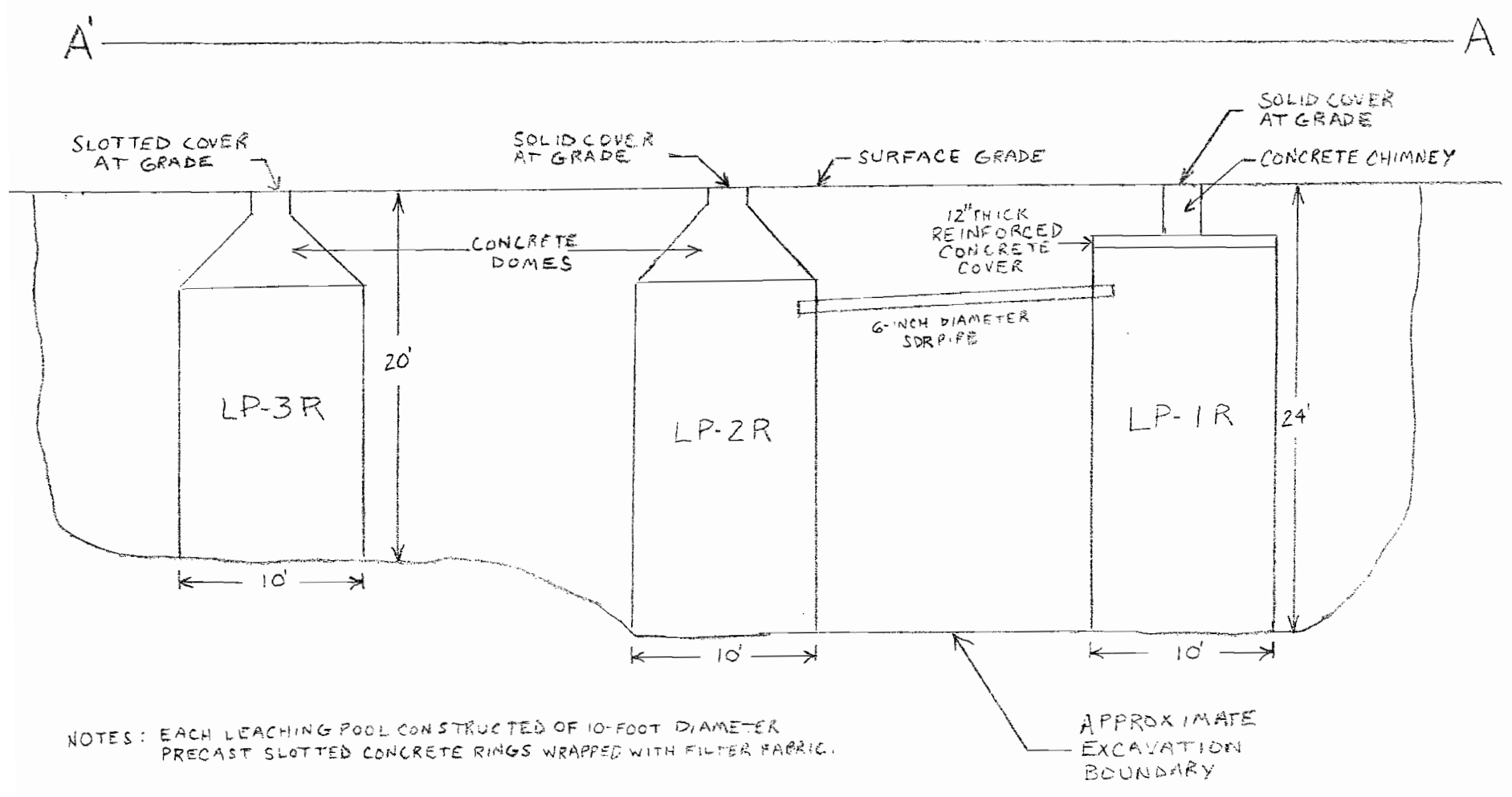
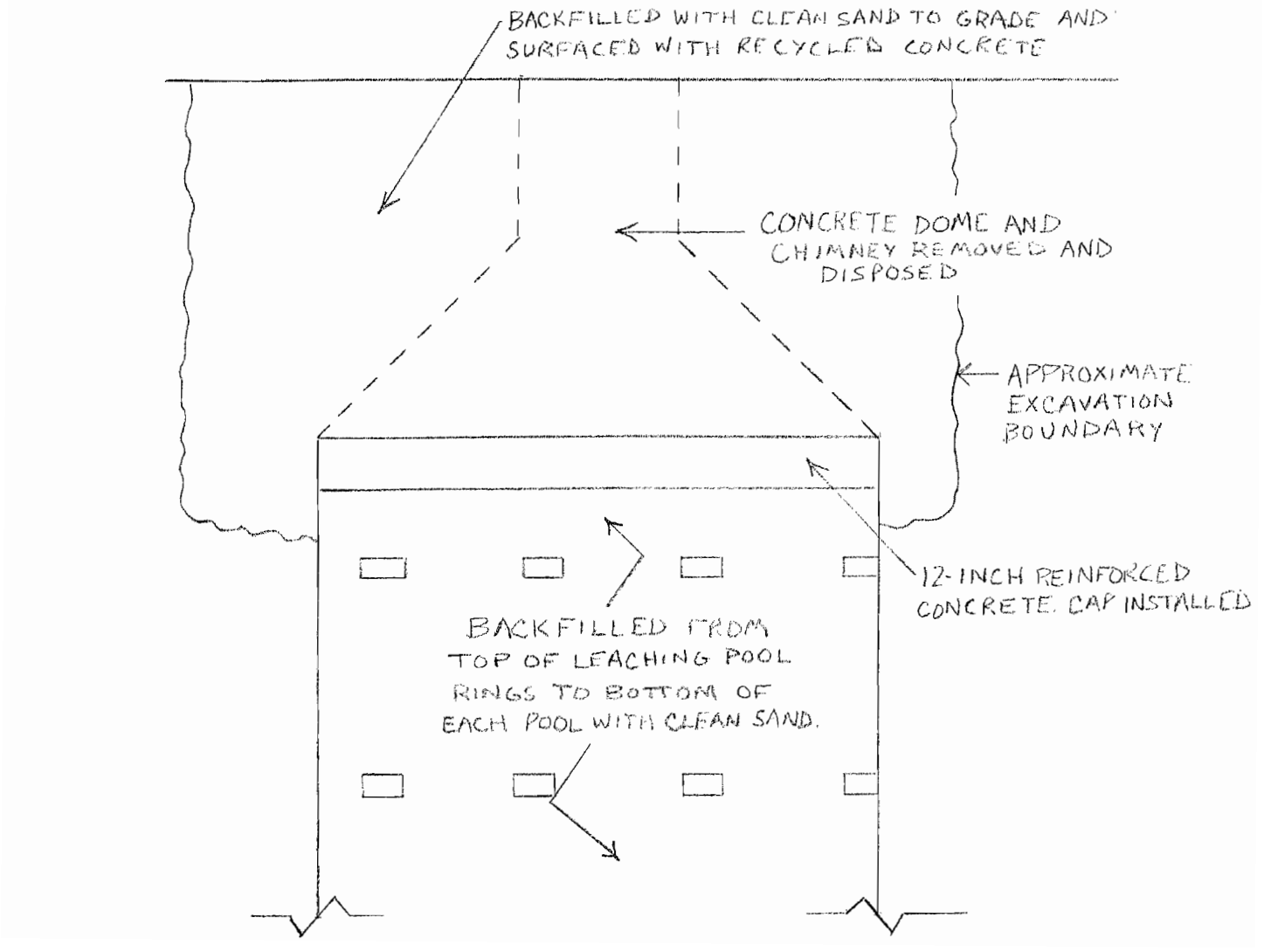


FIGURE 2
SCHEMATIC PROFILE OF LP-1R THROUGH LP-3R
35 MELVILLE PARK RD



NOTES: EACH LEACHING POOL CONSTRUCTED OF 10-FOOT DIAMETER PRECAST SLOTTED CONCRETE RINGS WRAPPED WITH FILTER FABRIC.

FIGURE 3
DIAGRAM OF ABANDONMENT PROCEDURES FOR LP-1 THROUGH LP-3



ATTACHMENT 2

PHOTOS

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Photo #1 – View of the excavation for LP-1R.

Photo #2 – View of LP-1R and the excavation for LP-2R.

Photo #3 – View of the installation of the new leaching pools. LP-2R is shown on the left, LP-3R is being installed on the right.

Photo #4 – View of the excavation for LP-1R (shown on the left). The excavation for LP-2 can be seen in the background.

Photo #5 – View of the stockpiled material excavated during the installation of LP-1R through LP-3R.

Photo #6 – View of the new leaching pool being backfilled. LP-1R is shown in the foreground, LP-3R in the background.

Photo #7 – View of the completed work area looking north.

Photo #8 – View of the completed work area looking southeast.