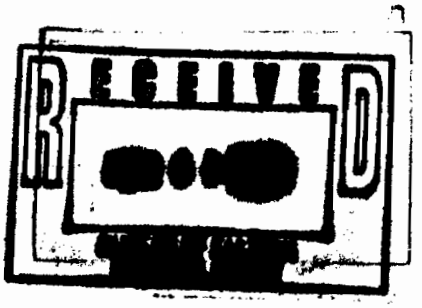
December 10, 1996




Mr. Steven Scharf, P.E.
Bureau of Eastern Remedial Action
Division of Hazardous Waste Remediation
NYSDEC
50 Wolf Road
Albany, New York 12233

Re: Minmilt Realty
Site # 1-52-147

Dear Mr. Scharf:

P.W. Grosser Consulting Engineer & Hydrogeologist, P.C. (PWGC) has prepared the following on behalf of Minmilt Realty in response your October 2, 1996 correspondence (Attachment 1). Addressed specifically is that portion of the correspondence entitled "**Off Site Remedial Investigation Work plan and Feasibility Study**".

1) To date, the offsite investigation has included the installation of deep monitoring well MW-9 on the Cantor Bros. site. Through the installation of this well, a tremendous amount of data was generated including, but not limited to:

- a detailed geologic profile extending to 198 feet below grade;
- a DNAPL groundwater profile utilizing hydrophobic dye testing;
- a dissolved groundwater contaminant profile based upon laboratory data; and
- confirmation of a confining clay believed to mark the base of the dissolved plume

2) Additionally, as you are aware, PWGC has been working with representatives of Cantor Bros. and Shorewood Packaging to incorporate the monitoring wells located on those sites into the Minmilt monitoring well network. This adds an additional ten downgradient monitoring wells to the Minmilt network. Four of these wells have already been incorporated into the Minmilt elevation survey and have previously been used to generate groundwater contours. The remaining wells will also be added to the elevation survey which will provide greater detail for the calculation of groundwater and plume direction. These off site wells are scheduled to be sampled as part of the baseline sampling round prior to startup of the Interim Remedial Measure.

A figure detailing the geologic profile and dissolved groundwater profile is provided for your use (Attachment 2). Detailed information regarding monitoring well MW-9 and the expanded monitoring well network can be found in the *Remedial Investigation Report dated February 1996.*

3,4,5) In addition to detailed near offsite information, the RI presented groundwater quality data from other investigations in the East Farmingdale area. This information was used to evaluate the existence of additional sources of groundwater contamination surrounding the Minmilt site and is presented in

the report entitled *Investigation Report for Hygrade Metal Moulding Corp., 540 Smith Street, East Farmingdale, New York , March 1993 Revised January 1994.* A figure illustrating sources of contamination in the Minmilt vicinity is provided (Attachment 3).

With respect to off site receptors, a detailed search for public and private supply wells and industrial wells was performed as part of the risk assessment entitled *Risk Assessment, Final Revision July 1996* performed by PWGC. Results of the survey indicated that the industrial, commercial, cemetery and residential areas downgradient of the Minmilt site are supplied by public water from either the Suffolk County Water Authority or the East Farmingdale Water District. Additionally, no surface water discharges are known to exist downgradient of the Minmilt site. A copy of the figure detailing the location of the local supply and industrial wells as well as the known inactive hazardous waste sites is attached for your use (Attachment 4).

Based upon the findings of the risk assessment, there are no sensitive receptors located downgradient of the Minmilt site. To the contrary, the nearest downgradient areas consist of industrial properties, cemetery land and the Pinelawn Industrial Area which contains a number of other inactive hazardous waste sites. Based upon the absence of sensitive receptors downgradient of the Minmilt site, the performance of a fate and transport model is unnecessary.

Based upon the above, PWGC is of the opinion that the RI requirement of the Consent Order has been satisfied. PWGC therefore proposes no additional RI work and requests that the NYSDEC classify the RI as complete.

The IRM startup is currently underway and the system will be fully operational shortly. In order to achieve environmental compliance, Minmilt Realty must focus its limited resources on the operation and maintenance of the IRM and cleanup of the site. PWGC would, therefore, also like to discuss with the NYSDEC the FS requirement of the Consent Order.

Please contact this office with questions or comments.

have not met C.O. requirements - full off site investigation is required!

Very truly yours,
**P.W. GROSSER CONSULTING**
**ENGINEER & HYDROGEOLOGIST, P.C.**

Frank P. Castellano, P.G.
Senior Hydrogeologist

att.

FPC:f
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cc w/out att.: R. Cole, Minmilt
D. Middleton, MKA

# ATTACHMENT 1

NYSDEC Correspondence dated October 2, 1996

**NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION**
**50 Wolf Road, Albany, New York 12233-7010**

**Michael D. Zagata**
**Commissioner**

October 2, 1996

Frank Castellano
P.W. Grosser Associates
100 South Main Street, Suite 202
Sayville, New York 11782-3150

RE: Minmilt Realty Site, East Farmingdale,
Suffolk County Site No. 1-52-147

Dear Mr. Castellano:

This letter serves as an update for the ongoing status of all aspects of the Minmilt Realty Site Remedial Investigation/Feasibility Study (RI/FS) project. Currently, the Interim Remedial Measure (IRM) is under construction. This IRM consists of a Vacuum Enhanced Recovery (VER) system and two groundwater recovery wells. As part of this IRM there is an air discharge and a State Pollution Discharge Elimination (SPDES) for water. Also, as you know there is an offsite component of the groundwater plume that will require an RI/FS work plan.

## IRM

### Construction Status

Based on site visits during the field work startup and telephone conversations, it is my understanding that the IRM construction is approaching substantial completion. The remaining tasks are the connection of the preconstructed packed air stripper tower, the granular activated carbon (GAC) unit, blowers, pumps and the installation of the two recovery wells. The current schedule is to have this work finished by the end of this month. Once complete, a start up period will be necessary to insure proper system operation.

### Application for Process Exhaust

P.W. Grosser Associates on behalf of the Minmilt Realty Corporation has submitted an Air-100 permit application for a Process, Exhaust or Ventilation system permit to construct and operate a pocess exhaust. Specifically, this is the treated air discharge from the Vacuum Enhanced Recovery (VER) system and the combined air stripper and recovery well system. Based on the projected post treated air discharge, the New York State Department of Environmental Conservation (NYSDEC) has reviewed this application and finds it acceptable. As a Class 2 Inactive Hazardous Waste Disposal Site in New York State, an actual permit is not required. The NYSDEC review of the effluent discharge is enclosed for your information. P. W. Grosser must submit an IRM Operation and Maintenance (O&M) Plan detailing how the performance criteria for all aspects of the system ~~and~~ will be achieved. Based on discussions

from our September 30, 1996 meeting, this has already been prepared and will be submitted to the NYSDEC for review shortly.

**State Pollution Discharge Elimination System (SPDES)**

The IRM calls for the treated water effluent to be discharged into the Town of Babylon recharge basin next to the Minmilt Site. It is my understanding that the Town of Babylon required a percolation test be performed to insure that there is adequate recharge to the upper glacial aquifer. These results were forwarded to the Town of Babylon and, based on the results, there is a satisfactory rate of recharge. Therefore the Town will not require Minmilt Realty to clean out the basin.

As with the air discharge, no permit will be required. The SPDES limits established for discharging to the basin have been forwarded to you under previous Pacchiana to Castellano correspondence dated March 26, 1996. Theses SPDES discharge limits are also enclosed with this letter for your information. The O&M Plan must include sampling to insure that the SPDES requirements are being addressed.

**Off Site Remedial Investigation Work plan and Feasibility Study**

P.W. Grosser Associates must submit a work plan as per the Consent Order dated January, 1994 for the offsite groundwater plume investigation. This work plan needs to include acquiring hydropunch and piezometer data to obtain a groundwater profile for the offsite contamination and the direction of the plume. This information will be incorporated into a groundwater model to predict the fate and transport of the plume. This RI must also identify offsite receptors including but not limited to municipal wells, industrial wells, private wells and surface water discharges. All this will need to be verified by the installation of actual wells and or the sampling of existing monitoring wells in the vicinity of the Minmilt Realty Site.

All the above data will be used as input to perform a qualitative risk assessment. This will then be used to determine if a Feasibility Study is necessary.

If you have any questions regarding the above please contact me at your earliest convenience at (518)457-3395.

Sincerely yours,

Steven Scharf

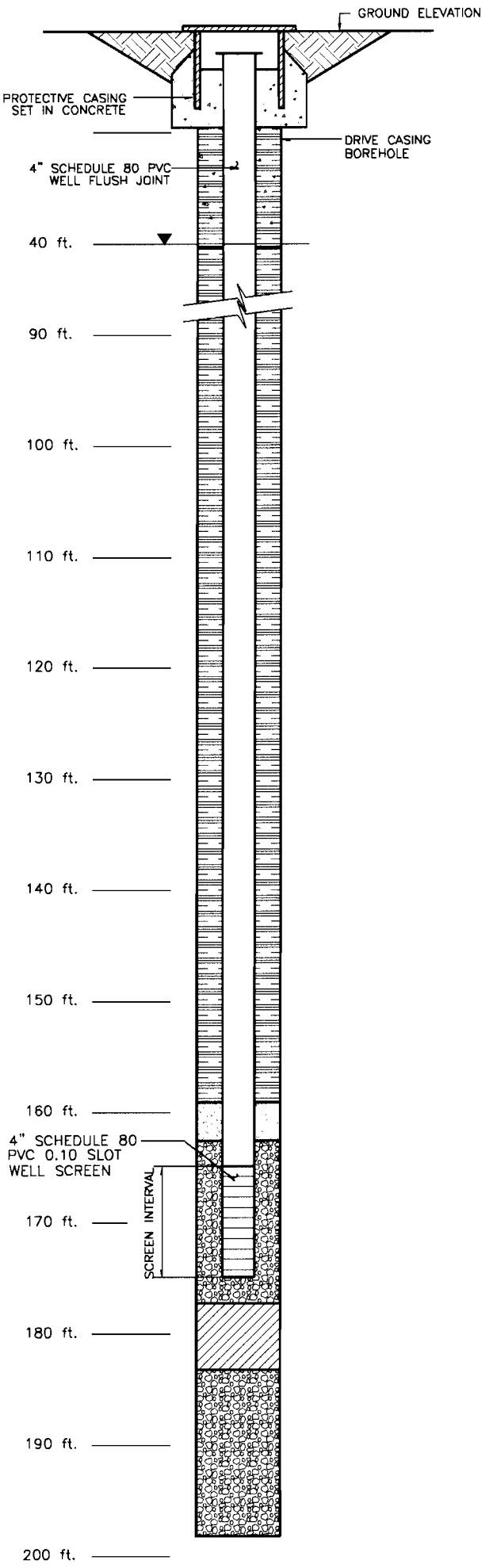
Steven M. Scharf, P.E.
Bureau of Eastern Remedial Action
Division of Environmental Remediation

c: A. Walter, P.W. Grosser (w/att)
D. Middleton 754 Deer Park Ave
North Babylon, NY 11703

# ATTACHMENT 2

Figure Entitled

*Deep Monitoring Well MW-9 Well Construction-Geologic/Geochemical Profile*

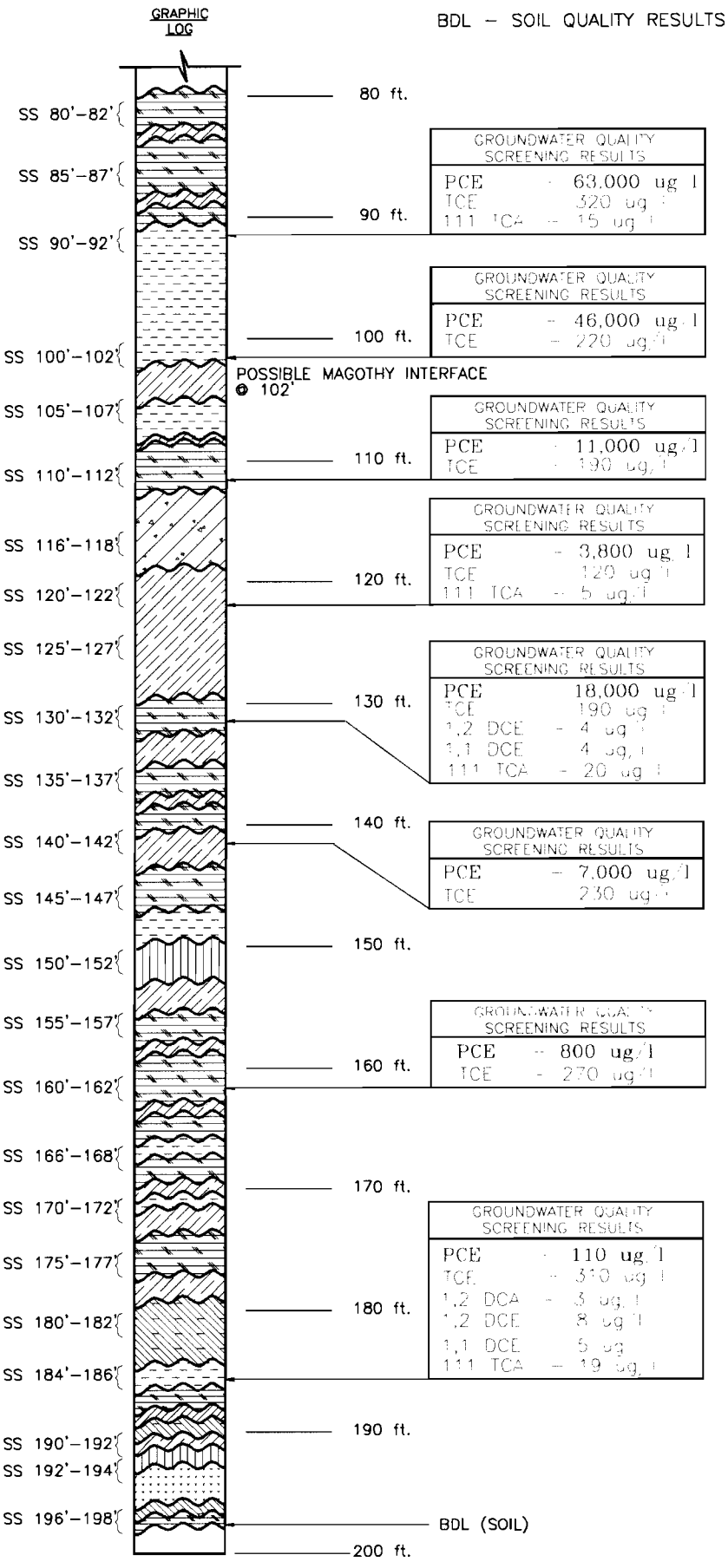



LEGEND

BDL – BELOW DETECTABLE LEVEL

USCS – UNIFIED SOIL CLASSIFICATION SYSTEM

BDL – SOIL QUALITY RESULTS




| SYMBOL | USCS DESCRIPTION |
|---|---|
| | CLAYEY GRAVELS & GRAVEL SAND CLAY MIXTURE |
| | WELL GRADED SANDS, GRAVELLY SANDS & LITTLE OR NO FINES |
| | CLAYEY SANDS & SAND–CLAY MIXTURE |
| | SILTY SANDS & SAND–SILT MIXTURES |

| SYMBOL | USCS DESCRIPTION |
|---|---|
| | INORGANIC CLAYS OF HIGH PLASTICITY & FAT CLAYS |
| | INORGANIC SILTS, VERY FINE SANDS, CLAYEY SILTS & SLIGHT PLASTICITY |
| | INORGANIC CLAYS OF LOW TO MEDIUM PLASTICITY, GRAVELLY CLAYS, SANDY CLAYS & SILTY CLAYS |

| SYMBOL | DESCRIPTION |
|---|---|
| | CEMENT/BENTONITE SLURRY |
| | BENTONITE SEAL |
| | BENTONITE SLURRY |

| SYMBOL | DESCRIPTION |
|---|---|
| | FINE SAND |
| | GRAVEL PACK |

# DEEP MONITORING WELL MW–9
# WELL CONSTRUCTION–GEOLOGIC/GEOCHEMICAL PROFILE

FILE: MIN9501
DATE: 12/11/95
DWG: 3

# ATTACHMENT 3

Figure Entitled

*Vicinity Map With Contamination Profiles*
*Hygrade Metal Moulding Mfg. Corp.*

# ATTACHMENT 4

Figure Entitled

*Location of Water Supply Wells and Known Waste Sites In the Vicinity of Hygrade*