

**New York Twist Drill OU-2
OFF-SITE
SUFFOLK COUNTY
MELVILLE, NEW YORK**

SITE MANAGEMENT PLAN

NYSDEC Site Number: 1-52-169

Prepared for:

Respondents:
Drico Corporation;
Robert, Mark and Jeffrey Hammer; and,
Suzanne Eliot
Order on Consent
Index Number W1-0998-04-04

Prepared by:

WSP USA, Inc.
350 Mt Kemble Ave, Morristown, NJ 07960
(973) 407-1000

Revisions to Final Approved Site Management Plan:

Revision No.	Date Submitted	Summary of Revision	NYSDEC Approval Date
1	05/22/2024 (Draft) and 10/29/2024 (Final)	Discontinue Soil Vapor Intrusion (SVI) sampling at 10 Melville Park Road, discontinue annual sampling at ERM-MW12S, submit annual groundwater monitoring results to the Department annually for review and approval, and submit Periodic Review Report (PRR) to the Department on a three (3) years frequency instead of one (1) year frequency.	10/29/2024

JANUARY 2016

SITE MANAGEMENT PLAN REVISION #1

NEW YORK TWIST DRILL OU-2 OFF-SITE

SUFFOLK COUNTY, MELVILLE, NY

NYSDEC ORDER ON CONSENT

INDEX #W1-0998-04-04

MAY 2024

A request to discontinue the Soil Vapor Intrusion (SVI) sampling at 10 Melville Park Road, associated with the above-referenced Site was submitted to the New York State Department of Environmental Conservation (NYSDEC) as part of the Periodic Review Report (PRR) and IC/EC Certification dated October 25, 2019 (Revised February 27, 2020) for the period of September 27, 2018 to September 27, 2019. NYSDEC approved this request as part of the PRR response letter dated March 04, 2020, requesting that a copy of the response letter be included with the Site Management Plan (SMP).

In addition, a request to discontinue annual sampling at ERM-MW-02, ERM-MW-02D, and ERM-MW-12S was submitted to NYSDEC as part of the PRR and IC/EC Certification dated December 02, 2020, for the period of September 27, 2019, to September 27, 2020. NYSDEC, as part of the PRR response letter dated January 26, 2021, approved the request to discontinue sampling at ERM-MW-12S, but still required continued annual sampling at ERM-MW-02 and ERM-MW-02D to determine if contamination from Operable Unit 1 (OU-1) is impacting off-site conditions as required by the Operable Unit 2 (OU-2) Record of Decision (ROD). NYSDEC's PRR response letter dated December 02, 2020, also confirmed the change in frequency of Periodic Reviews for this Site to 3 year(s) (from 1 year), following the submittal of the next PRR due on October 27, 2021. NYSDEC's Site Management Plan (SMP) Addendum #1- Approval Letter dated October 29, 2024, also clarified that the annual groundwater monitoring results should be submitted to the Department annually for review and approval.

As further noted in NYSEC's comment letter dated April 09, 2024, in response to the previous submittal of Draft SMP Addendum #1 (i.e. SMP Revision #1) dated March 5, 2024, *"The Site Management Plan developed for the New York Twist Drill site requires continued monitoring of groundwater. However, should future groundwater monitoring indicate a trend of increasing concentrations, re-evaluation for potential soil vapor intrusion may be necessary."*

The following further details supporting rationale for the NYSDEC-approved revisions summarized above:

SVI Sampling at 10 Melville Park Road

The OU-2 ROD indicated that SVI sampling of the structure at 10 Melville Park Road should be undertaken to insure that there is no vapor intrusion exposure pathway to employees using this building. As outlined in Section 3.4 of the PRR and IC/EC Certification dated October 25, 2019 (Revised February 27, 2020), the SVI data collected over three years of monitoring demonstrated the following for 10 Melville Park Road structure:

- No Site (OU-1) related contaminants at concentrations exceeding the New York State Department of Health (NYSDOH) Guidelines; and,
- No Site (OU-1) related contaminants in sub-slab samples at concentrations that would require mitigation.

As shown in Appendix B of the referenced PRR, except for wells that monitor the migration of OU-1 VOCs into OU-2, VOC concentrations decreased in all wells, indicating that the natural attenuation of VOC impacts from past activities was effective in restoring groundwater quality. Consequently, the potential for SVI into 10 Melville Park was anticipated to continue to decrease. Except for periods when the groundwater treatment system at 25 Melville Park Road required modification, SVI impacts to indoor air at the 10 Melville Park Road building had not been above NYSDOH Guidelines. Therefore, ERM requested discontinuation of SVI monitoring at 10 Melville Park Road.

A copy of NYSDEC's PRR response letter dated March 04, 2020, including approval of the discontinuation of SVI sampling at 10 Melville Park Road is included as **Appendix 1**.

Groundwater Monitoring and PRR Frequency

Annual groundwater monitoring has been performed at OU-2 in accordance with the SMP to assess the performance of the OU-1 remedy. In April 2020, consistent with the SMP requirements and previous annual sampling events, groundwater samples were collected from the following 13 monitoring wells: ERM-MW-01, ERM-MW-02, ERM-MW-02D, ERM-MW-05, ERM-MW-09, ERM-MW-11S, ERM-MW-11M, ERM-MW-11D, ERM-MW-12S, ERM-MW-12M, ERM-MW-13S, ERM-MW-13D and ERM-MW-14D.

As discussed in Section 3.1 of the PRR and IC/EC Certification dated December 02, 2020, consistent with the previous sampling results, the highest concentrations of PCE and TCE were detected near the center of the plume at Baylis Road (ERM-MW-11S and ERM-MW-11M). Concentrations of PCE and TCE in ERM-MW-11S were 31.4 µg/l and 34.6 µg/l, respectively. Concentrations of PCE and TCE in ERM-11M were 115 µg/l and 120 µg/l, respectively.

Analytical results from at least the previous two years from monitoring wells ERM-MW-02, ERM-MW-02D, and ERM-MW-12S were all below GWQC. Therefore, ERM recommended discontinuation of annual sampling in these select wells.

NYSDEC, as part of the PRR response letter dated January 26, 2021, approved the request to discontinue sampling at ERM-MW-12S, but still required continued annual sampling at ERM-MW-02 and ERM-MW-02D to determine if contamination from OU-1 is impacting off-site conditions as required by the OU-2 ROD.

NYSDEC's PRR response letter dated January 26, 2021, also confirmed the change in frequency of Periodic Reviews for this Site to 3 year(s) (from 1 year), following the submittal of the next PRR due on October 27, 2021.

A copy of NYSDEC's PRR response letter dated January 26, 2021, is included as **Appendix 2**.

A copy of NYSDEC's Site Management Plan (SMP) Addendum #1- Approval Letter dated October 29, 2024, is included as **Appendix 3**.

APPENDIX 1

NYSDEC'S RESPONSE LETTER DATED MARCH 04, 2020, FOR 2019 PRR

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Division of Environmental Remediation

625 Broadway, 11th Floor, Albany, NY 12233-7020

P: (518)402-9543 | F: (518)402-9547

www.dec.ny.gov

March 04, 2020

Greg Shkuda
ERM
105 Maxess Road, Suite 316
Melville, NY 11747

Re: Site Management (SM) Periodic Review Report (PRR) Response Letter
New York Twist Drill (Loading Dock Area), Melville
Suffolk County, Site No.: 152169

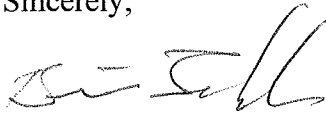
Dear Mr. Shkuda:

The Department has reviewed your Periodic Review Report (PRR) and IC/EC Certification for following period: September 27, 2018 to September 27, 2019.

The Department hereby accepts the PRR and associated Certification. The Department also agrees that sampling at 10 Melville Park Road is no longer required. Please include this letter with the Site Management Plan. The frequency of Periodic Reviews for this site is 1 year(s), your next PRR is due on October 27, 2020. You will receive a reminder letter and updated certification form 75-days prior to the due date. Regardless of receipt or not, of the reminder notice, the next PRR including the signed certification form, is still due on the date specified above.

If you have any questions, or need additional forms, please contact me at 518-402-9626 or e-mail: brian.jankauskas@dec.ny.gov.

Sincerely,



Brian Jankauskas
Project Manager

cc: John Swartwout, DEC
Walter Parish, DEC
Rosalie Rusinko, DEC
Charlotte Bethoney, DOH
Lisa Bromberg, Esq.
Frederick Eisenbud, Esq.

APPENDIX 2

NYSDEC'S RESPONSE LETTER DATED JANUARY 26, 2021, FOR 2020 PRR

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Division of Environmental Remediation

625 Broadway, 11th Floor, Albany, NY 12233-7020

P: (518)402-9543 | F: (518)402-9547

www.dec.ny.gov

January 26, 2021

Campolo, Middleton & McCormick, LLP
Robert, Mark and Jeffrey Hammer and Suzanne Eliot
Frederick Eisenbud, Esq.
4175 Veterans Memorial Highway, Suite 400
Ronkonkoma, NY 11779

Re: Site Management (SM) Periodic Review Report (PRR) Response Letter
New York Twist Drill (Loading Dock Area), Melville
Suffolk County, Site No.: 152169

Dear Robert, Mark and Jeffrey Hammer and Suzanne Eliot (as the Certifying Party):

The Department has reviewed your Periodic Review Report (PRR) and IC/EC Certification for following period: September 27, 2019 to September 27, 2020. The Department agrees with the termination of sampling at MW-12S, but still requires sampling at MW-02 and MW-02D to determine if contamination from Operable Unit 1 is impacting off-site conditions as required by the Operable Unit 2 Record of Decision.

The Department hereby accepts the PRR and associated Certification. The frequency of Periodic Reviews for this site is 3 year(s), your next PRR is due on October 27, 2021. You will receive a reminder letter and updated certification form 75-days prior to the due date. Regardless of receipt or not, of the reminder notice, the next PRR including the signed certification form, is still due on the date specified above.

If you have any questions, or need additional forms, please contact me at brian.jankauskas@dec.ny.gov.

Sincerely,

Brian Jankauskas

Brian Jankauskas
Project Manager

cc: John Swartwout, DEC
Chris Engelhardt, DEC
James Sullivan, DOH Project Manager

APPENDIX 3

**NYSDEC'S APPROVAL LETTER DATED OCTOBER 29, 2024 (FOR SITE
MANAGEMENT PLAN (SMP) ADDENDUM #1)**

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Division of Environmental Remediation, Region 1

SUNY @ Stony Brook, 50 Circle Road, Stony Brook, NY 11790

P: (631) 444-0240 | F: (631) 444-0248

www.dec.ny.gov

SENT VIA EMAIL ONLY

October 29, 2024

Ajay Kathuria, P.E.
Vice President
WSP USA Inc.
350 Mt. Kemble Avenue
Morristown, New Jersey 07960

Re:
Site Management Plan (SMP) Addendum #1- Approval Letter
New York Twist Drill (Loading Dock Area),
Melville, Suffolk County
Site No.: 152169

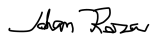
Dear Ajay Kathuria;

The New York State Departments of Environmental Conservation (Department) and Health (NYSDOH) have reviewed WSP USA Inc.'s revised SMP Addendum #1 dated 5/22/2024 for the above referenced New York Twist Drill Site and find it acceptable with following requirements:

1. The annual groundwater monitoring results should be submitted to the Department annually for review and approval.
2. Please insert the above requirement in SMP Addendum #1 and insert the NYSDEC's approval date (10/29/2024) on the cover page of the revised SMP Addendum #1 and submit the final document to the Department.

If you have any questions, please contact me at 631-444-0242 or e-mail:
jahan.reza@dec.ny.gov

Sincerely,



Jahan Reza
Project Manager

ec : R. Mustico, NYSDEC
G. Desai, NYSDEC
L. Schmidt, Esq., NYSDEC
S. Selmer, NYSDOH
J. Sullivan, NYSDOH
F. Eisenbud, Esq., Campolo, Middleton & McCormick, LLP