#### COMMITMENT & INTEGRITY DRIVE RESULTS

1520 Highland Avenue Cheshire, Connecticut 06492 www.woodardcurran.com T 888.265.8969 T 203.271.0379 F 203.271.7952

October 23, 2008



Mr. Dennis McChesney Ground Water Compliance Section, 20<sup>th</sup> Floor United States Environmental Protection Agency 290 Broadway New York, NY 10007-1866

Subject: Underground Injection Control Permit Class V Wells for a Potassium Permanganate Application Hangar D, Westchester County Airport White Plains, New York

Dear Mr. McChesney:

Pursuant to our telephone conversation on October 22<sup>nd</sup>, this correspondence provides inventory information and a description of activities to implement a potassium permanganate application at Hangar D of the Westchester County Airport located in White Plains, New York. A work scope has been provided under separate cover to the New York State Department of Environmental Conservation (NYSDEC) for its approval. The following sections provide a summary of this proposed work scope.

#### 1.0 PROPOSED ACTIONS

Woodard & Curran first plans to conduct a one day pre-application investigation to advance up to seven soil borings in the north corner of Hangar D (refer to Figure 1). Soil borings will be advanced continuously from the ground surface to the top of bedrock. Continuous soil samples will be collected in acetate sleeves, visually classified and screened for total volatile organic compounds (TVOCs) using a photoionization detector. One soil sample will be collected from each boring for VOC analysis from the interval with the highest TVOC reading or just above the water table. In addition, one soil sample will be collected from the southernmost boring for soil oxidant demand (SOD) testing. A 2-inch PVC test point will be completed within each bore hole. The points will be set at the top of bedrock (approximately 15 feet below the hangar floor) constructed of 10 feet of 2" dia. 10-slot PVC screen and #1 sand pack. Groundwater samples will be collected from each test point and analyzed for VOCs and field groundwater quality parameters (dissolved oxygen, oxidation-reduction potential, pH, temperature and conductivity).

Once the pre-application activities are complete, Woodard & Curran will conduct a one day potassium permanganate application. A Material Safety Data Sheet for potassium permanganate is included as Attachment A. Up to 175 kilograms (385 pounds) of potassium permanganate will be added to four locations in the area of well MW-01: three points proposed for the north (upgradient) corner of the hangar and to existing well MW-8S. Existing wells MW-02 and MW-7S, existing points GP-2B, GP-03, and the proposed new test point downgradient (south) of GP-2B will be available for post-addition monitoring. Local groundwater contours and relative elevations are included in Attachment B.

The potassium permanganate will be premixed in a mix tank and applied to the subsurface with a high-pressure grout pump. The mix tank will consist of a 125-gallon open topped drum. The powdered potassium permanganate will be mixed with water in the 125-gallon drum, which will be



placed on polyethylene sheeting to minimize the chance of spills. The solution will be pumped with a high pressure grout pump into the aquifer at a rate of 15-20 gallons per hour.

One month and three months following application activities, field groundwater quality parameters (dissolved oxygen, oxidation-reduction potential, pH, temperature and conductivity) will be monitored in all monitoring wells and test points and groundwater will be sampled and analyzed from up to 15 monitoring wells and any test points not used for potassium permanganate application. Groundwater samples will be analyzed for VOCs by EPA Method 8260. Thereafter, the prevailing quarterly groundwater monitoring plan for the site will resume.

Work will be conducted under the prevailing Health & Safety Plan for the site.

#### 2.0 SCHEDULE

The pre-application and application activities are expected to take four field days and are planned for November 2008. Post-application groundwater sampling events are proposed one month and three months following application, in December 2008 and February 2009.

#### 3.0 REPORT OF FINDINGS

Within sixty days of receipt of post-application laboratory analytical data, Woodard & Curran will summarize the results and findings in a letter to NYSDEC. The information presented in the letter will include:

- Summary of activities, field data, and laboratory results;
- Expanded understanding of the chemical distribution in subsurface media and a refined groundwater contour map below the hangar floor;
- Evaluation of the persistence of potassium permanganate in the subsurface; and
- Dissolved contaminant percent reductions observed as a result of application activities.

Please do not hesitate to contact me at (203) 271-0379 with if you need any additional information to facilitate your review and approval of this work scope. Thank you again for your time and assistance.

Sincerely,

WOODARD & CURRAN INC.

noctor

Anne E. Proctor, PE Sr. Project Manager

cc: M. Lamarre – ExxonMobil

- M. Tipple NYSDEC
- N. Walz NYSDOH
- M. Parletta Westchester County Airport
- M. DeGloria GES



Attachments:

Inventory of Injection Wells Form Figure 1: Site Plan Attachment A: Material Safety Data Sheet for Potassium Permanganate Attachment B: Dec. 2001 Remedial Investigation Report Figures 3-1 and 3-2

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## ATTACHMENT A – MATERIAL SAFETY DATA SHEET FOR POTASSIUM PERMANGANATE



EC- SAFETY DATA SHEET according to Regulation (EC) № 1907/2006 of the European Parliament and of the Council, of 18 December 2006 concerning REACH

### MATERIAL SAFETY DATA SHEET

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#### Section 1 Chemical Product and Company Identification

PRODUCT NAME: RemOx® S ISCO Reagent				
<b>TRADE NAME:</b> RemOx® S ISCO Reagent <b>Revised Date: April 2008</b>				
USES OF SUBSTANCE: RemOx® S IS	SCO Reagent is an oxidant recomme	nded for applications that require a strong		
oxidant.				
COMPANY NAME (Europe):	COMPANY ADDRESS:	Carus Nalon S.L.		
CARUS NALON S.L.		Barrio Nalon, s/n		
		33100 Trubia-Oviedo		
		Espana, Spain		
	INFORMATION:	(34) 985-785-513		
		(34) 985-785-513		
		www.caruseurope.com (Web)		
COMPANY NAME (US):		carus@carusnalon.com (Email)		
CARUS CORPORATION	<b>EMERGENCY TELEPHONE:</b>	(34) 985-785-513		
	COMPANY ADDRESS:	315 Fifth Street		
		Peru, IL 61354, USA		
	INFORMATION:	(815)-223-1500		
		www.caruscorporation.com (Web)		
	5	salesmkt@caruscorporation.com (Email)		
	<b>EMERGENCY TELEPHONE:</b>	(800) 435 –6856 (USA)		
		(800) 424-9300 (CHEMTREC, USA)		
		(815-223-1500 (Other countries)		

#### Section 2 Hazards Identification

#### 1. EYE CONTACT

RemOx® S ISCO Reagent is damaging to eye tissue on contact. It may cause severe burns that result in damage to the eye.

#### 2. <u>SKIN CONTACT</u>

Contact of solutions at room temperature may be irritating to the skin, leaving brown stains. Concentrated solutions at elevated temperature and crystals are damaging to the skin.

#### 3. INHALATION

Acute inhalation toxicity data are not available. However, airborne concentrations of RemOx® S ISCO Reagent the form of dust or mist may cause damage to the respiratory tract.

#### 4. INGESTION

RemOx® S ISCO Reagent , if swallowed, may cause severe burns to mucous membranes of the mouth, throat, esophagus, and stomach.



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#### Section 3 Hazardous Ingredients MATERIAL OR COMPONENT CAS NO. EINECS HAZARD DATA Potassium Permanganate 7722-64-7 231-760-3 PEL/C 5 mg Mn per cubic meter of air TLV-TWA 0.2 mg Mn per cubic meter of air HAZARD SYMBOLS: O **RISK PHRASES:** Contact with combustibles may case fire. 8 22 Harmful if swallowed. 50/53 Very toxic to aquatic organisms, may cause long-term effects in the aquatic environment. **SAFETY PHRASES:** This material and its container must be disposed of as hazardous waste. 60 61 Avoid releases to the environment. Refer to special instructions / Safety data sheet.

#### Section 4 First Aid Measures

#### 1. <u>EYES</u>

Immediately flush eyes with large amounts of water for at least 15 minutes holding lids apart to ensure flushing of the entire surface. Do not attempt to neutralize chemically. Seek medical attention immediately. **Note to physician**: Soluble decomposition products are alkaline. Insoluble decomposition product is brown manganese dioxide.

#### 2. <u>SKIN</u>

Immediately wash contaminated areas with water. Remove contaminated clothing and footwear. Wash clothing and decontaminate footwear before reuse. Seek medical attention immediately if irritation is severe or persistent.

#### 3. INHALATION

Remove person from contaminated area to fresh air. If breathing has stopped, resuscitate and administer oxygen if readily available. Seek medical attention immediately.

#### 4. INGESTION

Never give anything by mouth to an unconscious or convulsing person. If person is conscious, give large quantities of water. Seek medical attention immediately.



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### MATERIAL SAFETY DATA SHEET

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#### Section 5 Fire Fighting Measures

NFPA* HAZARD SIC	GNS					
Health Hazard	1 =	Materials whic	h under fire conditions would give off irritating combustion			
		products. (less	than 1 hour exposure)			
		Materials that of	on the skin could cause irritation.			
Flammability Hazard	0 =	Materials that	will not burn.			
Reactivity Hazard	0 =	Materials whic conditions, and	h in themselves are normally stable, even under fire exposure I which are not reactive with water.			
Special Hazard	OX =	Oxidizer				
*National Fire Protect	tion Ass	ociation 704 (US	5A)			
FIRST RESPONDERS:			Wear protective gloves, boots, goggles, and respirator. In case of fire, wear positive pressure breathing apparatus. Approach incident with caution.			
FLASHPOINT			None			
FLAMMABLE OR E	XPLOS	IVE LIMITS	Lower: Nonflammable Upper: Nonflammable			
EXTINGUISHING M	IEDIA		Use large quantities of water. Water will turn pink to purple if			
			in contact with RemOx® S ISCO Reagent. Dike to			
			contain. Do not use dry chemicals, $CO_2$ Halon® or foams.			
SPECIAL FIREFIGH	ITING I	PROCEDURES	If material is involved in fire, flood with water. Cool all affected			
			containers with large quantities of water. Apply water from as far a distance as possible. Wear self-contained breathing apparatus and full protective clothing.			
UNUSUAL FIRE AND EXPLOSION			Powerful oxidizing material. May decompose spontaneously if exposed to heat $(150^{\circ}C / 302^{\circ}F)$ . May be explosive in contact with			
			certain other chemicals (Section 10). May react violently with			
			finely divided and readily oxidizable substances. Increases			
			burning rate of combustible material.			

Section 6 Accidental Release Measures

#### **PERSONAL PRECAUTIONS:**

Ensure adequate ventilation. Avoid dust formation. Avoid inhalation and contact with eyes and skin. Personnel should wear protective clothing suitable for the task. Remove all ignition sources and incompatible materials before attempting clean up.

#### **ENVIRONMENTAL PRECAUTIONS:**

Do not flush into sanitary sewer system or surface water. If accidental release into the environment occurs, inform the responsible authorities. Keep the product away from drains, sewers, surface and ground water and soil.

#### STEPS TO BE TAKEN IF MATERIAL IS RELEASED OR SPILLED:

Clean up spills immediately by sweeping or shoveling up the material. Do not return spilled material to the original container – transfer to a clean metal drum. To clean contaminated surfaces or floors, flush with abundant quantities of water into sewer, if permitted by federal, state, and local regulations - if not, collect water and treat chemically (Section 13).



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## MATERIAL SAFETY DATA SHEET

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#### Section 7 Handling and Storage

#### WORK/HYGIENIC PRACTICES

Wash hands thoroughly with soap and water after handling RemOx® S ISCO Reagent. Do not eat, drink or smoke when working with RemOx® S ISCO Reagent. Wear proper protective equipment. Remove clothing, if it becomes contaminated.

#### VENTILATION REQUIREMETNS

Provide sufficient mechanical and/or local exhaust to maintain exposure below the TLV/TWA.

#### **CONDITIONS FOR SAFE STORAGE**

Store in accordance with NFPA 430 requirements for Class II oxidizers. Protect containers from physical damage. Store in a cool, dry area in closed containers. Segregate from acids, peroxides, formaldehyde, and all combustible, organic, or easily oxidizable materials including antifreeze and hydraulic fluid.

#### Section 8 Exposure Controls and Personal Protection

#### **RESPIRATORY PROTECTION**

In cases where overexposure to dust may occur, the use of an approved NIOSH-MSHA dust respirator or an air supplied respirator is advised. Engineering or administrative controls should be implemented to control dust

#### EYE

Faceshield, goggles, or safety glasses with side shields should be worn. Provide eyewash in working area.

#### **GLOVES**

Rubber or plastic gloves should be worn.

#### **OTHER PROTECTIVE EQUIPMENT**

Normal work clothing covering arms and legs, and rubber, or plastic apron should be worn.

#### Section 9 Physical and Chemical Properties

APPEARANCE AND ODOR BOILING POINT, 760 mm Hg VAPOR PRESSURE (mm Hg) SOLUBILITY IN WATER % BY SOLUTION PERCENT VOLATILE BY VOLUME EVAPORATION RATE MELTING POINT SPECIFIC GRAVITY	Dark purple solid with metallic luster, odorless Not applicable Not applicable 6% at 20°C (68°F) and 20% at 65°C (149°F) Not volatile Not applicable Starts to decompose with evolution of oxygen (O <sub>2</sub> ) at temperatures above 150°C (302°F). Once initiated, the decomposition is exothermic and self-sustaining. 2.7 at 20°C (68°F)
SPECIFIC GRAVITY BULK DENSITY	2.7 at 20°C (68°F) Approximately 1.45 $\pm 1.6$ kg /1
VAPOR DENSITY (AIR=1)	Not applicable
OXIDIZING PROPERTIES	Strong oxidizer



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## MATERIAL SAFETY DATA SHEET

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#### Section 10 Stability and Reactivity

STABILITY	Under normal conditions, the material is stable.
CONDITIONS TO AVOID	Contact with incompatible materials or heat (150°C / 302°F) could result in violent exothermic chemical reaction.
INCOMPATIBLE MATERIALS	Acids, peroxides, formaldehyde, anti-freeze, hydraulic fluids and all combustible organic or readily oxidizable inorganic materials including metal powders. With hydrochloric acid, chlorine gas is liberated.
HAZARDOUS DECOMPOSITION PRODUCTS	When involved in a fire, RemOx® S ISCO Reagent may liberate corrosive fumes.
CONDITIONS CONTRIBUTING TO HAZARDOUS POLYMERIZATION	Material is not known to polymerize.

Section 11 Toxicological Information

#### **POTASSIUM PERMANGANATE:**

#### **<u>1. ACUTE TOXICITY</u>**

#### **INGESTION:**

LD 50 oral rat: 780 mg/kg male (14 days); 525 mg/kg female (14 days). Harmful if swallowed. ALD: 10g. Ingestion may cause nausea, vomiting, sore throat, stomach-ache and eventually lead to a perforation of the intestine. Liver and kidney injuries may occur.

#### **SKIN CONTACT:**

LD 50 dermal no data available. The product may be absorbed into the body through the skin. Major effects of exposure: severe irritation, brown staining of skin.

#### **INHALATION:**

LC 5O inhalation: No data available. The product may be absorbed into the body by inhalation. Major effects of exposure: respiratory disorder, cough.

#### 2. CHRONIC TOXICITY

No known cases of chronic poisoning due to permanganates have been reported. Prolonged exposure, usually over many years, to heavy concentrations of manganese oxides in the form of dust and fumes may lead to chronic manganese poisoning, chiefly involving the central nervous system.

#### **<u>3. CARCINOGENICITY</u>**

Potassium permanganate has not been classified as a carcinogen by ACGIH, NIOSH, OSHA, NTP, or IARC.

#### 4. MEDICAL CONDITIONS GENERALLY AGGRAVATED BY EXPOSURE

Potassium permanganate solution will cause further irritation of tissue, open wounds, burns or mucous membranes.



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#### Section 12 Ecological Information

#### ENTRY TO THE ENVIRONMENT

Potassium permanganate has a low estimated lifetime in the environment, being readily converted by oxidizable materials to insoluble MnO<sub>2</sub>.

#### **BIOCONCENTRATION POTENTIAL**

In non-reducing and non-acidic environments, MnO<sub>2</sub> is insoluble and has a very low bioaccumulative potential.

#### AQUATIC TOXICITY

The toxicity data for Potassium permanganate is given below:

Rainbow trout, 96 hour $LC_{50}$ :	1.8 mg/L
Bluegill sunfish, 96 hour LC <sub>50</sub> :	2.3 mg/I
Milk fish (Chanos Chanos)/ 96 hour LC <sub>50</sub> :	>1.4mgl

#### Section 13 Disposal Considerations

Offer surplus and non-recyclable product or solutions to a licensed disposal company.

Reduce RemOx S ISCO Reagent in aqueous solutions with sodium thiosulfate, a bisulfite or ferrous salt solution. The bisulfite or ferrous salt may require some dilute sulfuric acid (10% w/w) to promote reduction. Neutralize with sodium carbonate to neutral pH, if acid was used. Decant or filter and deposit sludge in approved landfill. Where permitted, the sludge may be drained into sewer with large quantities of water. Contact Carus Corporation for additional recommendations.

Packaging materials must be triple rinsed to remove all RemOx® S ISCO Reagent prior to re-cycling or disposal.

#### Section 14 Transport Information

USA (land, D.O.T.)	<b>Proper Shipping Name:</b>	49 CFR172.101Potassium Permanganate
	Hazard Class:	49 CFR172.101Oxidizer
	ID Number:	49 CFR172.101UN 1490
	Packing Group:	49 CFR172.101II
	Division:	49 CFR172.1015.1
European Labeling in	ID Number:	UN 1490
accordance Road/Rail	ADR/RID Class	5.1
Transport (ADR/RID)	<b>Description of Goods:</b>	Potassium Permanganate
	Hazard Identification No	<b>b.</b> 50
European Labeling in	<b>Proper Shipping Name:</b>	Potassium Permanganate
accordance with EC	Hazard Class:	Oxidizer
directive (Water, I.M.O.)	ID Number:	UN 1490
	Packing Group:	II
	Division:	5.1
	Marine Pollutant:	No



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#### Section 14 Transport Information (contd.)

European Labeling in	<b>Proper Shipping Name:</b>	Potassium Permanganate
accordance with EC	Hazard Class:	Oxidizer
directive (Air, I.C.A.O.)	ID Number:	UN 1490
	Packing Group:	II
	Division:	5.1

### Section 15 Regulatory Information

EUROPEAN AND INTERN	NATIONAL REGULAT	TIONS:	
MARKINGS ACCORDING	G TO EU GUIDELINES	5:	
The product has bee	n classified and marked in	n accordance with	EU directives/ordinances
on hazardous materi	als.		
CHEMICAL NAME	CAS NO.	EINECS	<u>UN NUMBER</u>
Potassium Permanganate	7722-64-7	231-760-3	UN 1490
CODE LETTER AND HAZ	LARD DESIGNATION	OF THE PRODU	J <u>CT:</u>
Oxidizer	<b>Xn</b> Harmful Danş	Rerous to the Envi	ronment
RISK PHRASES:			
8 Contact with con	nbustibles may case fire.		
22 Harmful if swalle	owed.	- 1 ff	in the encodie encourse of
50/55 Very toxic to aqu	and organisms, may cause	e long-term effecti	s in the aquatic environment.
SAFETY PHRASES:			
60 This motorial and	its container must be dis	nosed of as hererd	oue weste
61 Avoid releases to	the environment. Refer t	to special instructi	ous waste. ons / Safety data sheet.
		1	<b>,</b>



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#### Section 15 Regulatory Information (contd.)

US FEDERAL REGULATIONS CHEMICAL INVENTORY	: STATUS – PART 1			
Ingredient Potassium Permanganate	<u>CAS. NO.</u> 7722-64-7	<u>TSCA</u> <u>EC</u> Yes Yes	<u>Japan</u>	Australia
CHEMICAL INVENTORY STATUS – PART 2 CANADA				
<u>Ingredient</u> Potassium Permanganate	<u>CAS. NO.</u> 7722-64-7	<u>Korea</u> <u>DSI</u> No Yes	L <u>NDSL</u>	PHIL
This product has been classific Canada) and the MSDS contai	ed in accordance with the h ns all of the information re	azard criteria of equired by the C	f the Contro PR.	lled Products Regulation (CPR,
FEDERAL, STATE & INTE	RNATIONAL REGULA	TIONS – PAR	RT 1	SADA 212
Ingredient_ Potassium Permanganate	<u>CAS. NO.</u> 7722-64-7	<u>SARA 302</u> <u>RQ</u> <u>TPQ</u> N/A N/A	Lis Ye (Manj	<u>SARA 313</u> st <u>Chemical Catg.</u> es Yes ganese compounds)
FEDERAL, STATE & INTE	RNATIONAL REGULA	TIONS – PAR	RT 2	
Ingredient_ Potassium Permanganate	<u>CAS. NO.</u> 7722-64-7	<u>CERCLA</u> Yes (RQ =	:100 lbs)	RCRATSCA 8(d)D001No
Ingredient	<u>CAS. NO.</u>	<u>CWC</u> <u>TSC</u>	<u>A 12(b)</u>	CDTA SARA
Potassium Permanganate	7722-64-7	No N	lo	<u>511/512</u> 4545 Kg
Ingredient_ Potassium Permanganate	CAS. NO.         Acute           7722-64-7         Yes	ChronicFireYesYes	Pressure No	ReactivityPure/LiquidNoPure
<u>Ingredient</u> Potassium Permanganate	CAS. NO. Austral	<u>ian Hazchem C</u>	ode <u>Poiso</u>	n Schedule WHMIS C, D2B



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#### Section 16 Other Information

NIOSH	National Institute for Occupational Safety and Health
MSHA	Mine Safety and Health Administration
OSHA	Occupational Safety and Health Administration
NTP	National Toxicology Program
IARC	International Agency for Research on Cancer
PEL	Permissible Exposure Limit
С	Ceiling Exposure Limit
TLV-TWA	Threshold Limit Value-Time Weighted Average
CAS	Chemical Abstract Service
EINECS	Inventory of Existing Chemical Substances (European)

Chithambarathanu Pillai (S.O.F.) April 2008

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## ATTACHMENT B – DECEMBER 2001 REMEDIAL INVESTIGATION REPORT

FIGURE 3-1: GROUNDWATER CONTOUR PLAN

FIGURE 3-2: GEOLOGIC CROSS SECTION A-A' REVISED TO INCLUDE EXISTING AND PROPOSED TEST POINTS









