

# PROPOSED REMEDIAL ACTION PLAN

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Alexander Schmigel Property  
State Superfund Project  
Hoosick, Rensselaer County  
Site No. 442002  
February 2013



Prepared by  
Division of Environmental Remediation  
New York State Department of Environmental Conservation

# PROPOSED REMEDIAL ACTION PLAN

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Site No. 442002  
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## **SECTION 1: SUMMARY AND PURPOSE OF THE PROPOSED PLAN**

The New York State Department of Environmental Conservation (the Department), in consultation with the New York State Department of Health (NYSDOH), is proposing a remedy for the above referenced site. The disposal of hazardous wastes at the site resulted in threats to public health and the environment that were addressed by actions known as interim remedial measures (IRMs), which were undertaken at the site. An IRM is conducted at a site when a source of contamination or exposure pathway can be effectively addressed before completion of the remedial investigation (RI) or feasibility study (FS). The IRMs undertaken at this site are discussed in Section 6.2.

Based on the implementation of the IRM(s), the findings of the RI indicate that the site no longer poses a threat to human health or the environment. The IRM(s) conducted at the site attained the remediation objectives identified for this site, which are presented in Section 6.5, for the protection of public health and the environment. No Further Action is the remedy proposed by this Proposed Remedial Action Plan (PRAP). A No Further Action remedy may include site management, which will include continued operation of any remedial system installed during the IRM and the implementation of any prescribed institutional controls/engineering controls (ICs/ECs) that have been identified as being part of the proposed remedy for the site. This PRAP identifies the IRM(s) conducted and discusses the basis for No Further Action.

The New York State Inactive Hazardous Waste Disposal Site Remedial Program (also known as the State Superfund Program) is an enforcement program, the mission of which is to identify and characterize suspected inactive hazardous waste disposal sites and to investigate and remediate those sites found to pose a significant threat to public health and environment.

The Department has issued this document in accordance with the requirements of New York State Environmental Conservation Law and Title 6 of the Official Compilation of Codes, Rules and Regulations of the State of New York (6 NYCRR) Part 375. This document is a summary of the information that can be found in the site-related reports and documents in the document repository identified below.

## **SECTION 2: CITIZEN PARTICIPATION**

The Department seeks input from the community on all PRAPs. This is an opportunity for public participation in the remedy selection process. The public is encouraged to review the

reports and documents, which are available at the following repository:

Cheney Library  
Attn: Ms. Carol Gaillard  
P.O. Box 177  
Classic Street  
Hoosick Falls, NY 12090-0177  
Phone:

**A public comment period has been set from :**

**2/28/13 to 3/30/13**

**A public meeting is scheduled for the following date:**

**3/12/13 at 6:30 PM**

**Public meeting location:**

**Town Hall  
New York State Armory  
80 Church Street  
Hoosick Falls, NY 12090**

At the meeting, the findings of the remedial investigation (RI) will be presented along with a summary of the proposed remedy. After the presentation, a question-and-answer period will be held, during which verbal or written comments may be submitted on the PRAP.

Written comments may also be sent through **3/30/13** to:

James Moras  
NYS Department of Environmental Conservation  
Division of Environmental Remediation  
625 Broadway  
Albany, NY 12233  
[jamoras@gw.dec.state.ny.us](mailto:jamoras@gw.dec.state.ny.us)

The Department may modify the proposed remedy presented in this PRAP based on new information or public comments. Therefore, the public is encouraged to review and comment on the proposed remedy identified herein. Comments will be summarized and addressed in the responsiveness summary section of the Record of Decision (ROD). The ROD is the Department's final selection of the remedy for this site.

**Receive Site Citizen Participation Information By Email**

Please note that the Department's Division of Environmental Remediation (DER) is "going paperless" relative to citizen participation information. The ultimate goal is to distribute citizen participation information about contaminated sites electronically by way of county email listservs. Information will be distributed for all sites that are being investigated and cleaned up in a particular county under the State Superfund Program, Environmental Restoration Program, Brownfield Cleanup Program, Voluntary Cleanup Program, and Resource Conservation and Recovery Act Program. We encourage the public to sign up for one or more county listservs at <http://www.dec.ny.gov/chemical/61092.html>

### **SECTION 3: SITE DESCRIPTION AND HISTORY**

#### **Location:**

This site is less than one-quarter acre in size and is located in a rural area of Rensselaer County, approximately 2.5 miles northeast of Hoosick Falls. The site is bounded by a wooded area to the north, a residential access drive to the south, a wooded area to the east and a residential access drive to the west.

#### **Site Features:**

The site is located on the east side of the entrance road which services a small residential area. The area of concern is a low area, approximately 200 feet from Route 67, that is a former fill area.

#### **Current Zoning/Use:**

The area is a rural/residential area and the site is zoned residential; as discussed above, the disposal area is located adjacent to an entrance road which services a small residential area. The closest residence is located less than 100 from the former disposal area.

#### **Past Uses of the Site:**

In 1977 the site was used for the disposal of approximately 165 55-gallon drums of waste (consisting of polymer resins, acetone, 2-methoxyethyl ester of acetic acid and methyl cellosolve (2-methoxyethanol) from the Oak Materials Co., located in nearby Hoosick Falls, NY. The site owner reportedly poured the liquid contents of the drums into a small pit, then crushed the emptied drums and dumped them into the same pit. The open pit was then backfilled with soil and assorted refuse (auto parts, tires, bicycle frames, wire, lumber, tree limbs, bed springs, paper, plastic, etc.). The site was also allegedly used by a local garage for disposal of waste lubricating oils. An early site inspection report, prepared by the Rensselaer County Health Department, indicated no obvious odors, color variations or seepages noted in the disposal area.

#### **Site Geology and Hydrogeology:**

The site is located in a hilly area which generally slopes from the north to the south, with a low swampy area located just west-southwest of the site. Bedrock (shale) at the site is present at a depth of approximately 5-10 feet below ground surface. The Walloomsac River is located to the south of the site; at its closest point the river is approximately 1000 feet from the site. At the site groundwater flows to the southwest and is present approximately 8-10 below the ground surface.

A site location map is attached as Figure 1.

## **SECTION 4: LAND USE AND PHYSICAL SETTING**

The Department may consider the current, intended, and reasonably anticipated future land use of the site and its surroundings when evaluating a remedy for soil remediation. For this site, an alternative which allows for unrestricted use of the site was evaluated.

A comparison of the results of the investigation against unrestricted use standards, criteria and guidance values (SCGs) for the site contaminants is included in the Tables for the media being evaluated in Exhibit A.

## **SECTION 5: ENFORCEMENT STATUS**

Potentially Responsible Parties (PRPs) are those who may be legally liable for contamination at a site. This may include past or present owners and operators, waste generators, and haulers.

The PRPs for the site, documented to date, include:

Honeywell International, Inc.

The Department and Honeywell International, Inc. entered into a Consent Order on December 21, 2006. The Order obligates the responsible party to implement an Interim Remedial Measure (IRM).

## **SECTION 6: SITE CONTAMINATION**

### **6.1: Summary of the Remedial Investigation**

A Remedial Investigation (RI) has been conducted. The purpose of the RI was to define the nature and extent of any contamination resulting from previous activities at the site. The field activities and findings of the investigation are described in the RI Report.

The following general activities are conducted during an RI:

- Research of historical information,
- Geophysical survey to determine the lateral extent of wastes,
- Test pits, soil borings, and monitoring well installations,
- Sampling of waste, surface and subsurface soils, groundwater, and soil vapor,
- Sampling of surface water and sediment,
- Ecological and Human Health Exposure Assessments.

The analytical data collected on this site includes data for:

- groundwater
- surface water
- drinking water
- soil

#### **6.1.1: Standards, Criteria, and Guidance (SCGs)**

The remedy must conform to promulgated standards and criteria that are directly applicable or that are relevant and appropriate. The selection of a remedy must also take into consideration guidance, as appropriate. Standards, Criteria and Guidance are hereafter called SCGs.

To determine whether the contaminants identified in various media are present at levels of concern, the data from the RI were compared to media-specific SCGs. The Department has developed SCGs for groundwater, surface water, sediments, and soil. The NYSDOH has developed SCGs for drinking water and soil vapor intrusion. The tables found in Exhibit A list the applicable SCGs in the footnotes. For a full listing of all SCGs see: <http://www.dec.ny.gov/regulations/61794.html>

#### **6.1.2: RI Results**

The data have identified contaminants of concern. A "contaminant of concern" is a hazardous waste that is sufficiently present in frequency and concentration in the environment to require evaluation for remedial action. Not all contaminants identified on the property are contaminants of concern. The nature and extent of contamination and environmental media requiring action are summarized in Exhibit A. Additionally, the RI Report contains a full discussion of the data. The contaminant(s) of concern identified at this site is/are:

ACETONE

LEAD

Based on the investigation results, comparison to the SCGs, and the potential public health and environmental exposure routes, certain media and areas of the site required remediation. These media were addressed by the IRM(s) described in Section 6.2. More complete information can be found in the RI Report and the IRM Construction Completion Report.

#### **6.2: Interim Remedial Measures**

An interim remedial measure (IRM) is conducted at a site when a source of contamination or exposure pathway can be effectively addressed before issuance of the Record of Decision.

The following IRM(s) has/have been completed at this site based on conditions observed during the RI.

##### Excavation of Disposal Area

IRM activities were conducted at the site from October 25, 2010 through November 17, 2010, and from November 15, 2011 through November 17, 2011. The excavation area became larger than originally planned and a utility pole needed to be re-located to complete the excavation. The utility pole took 11 months to move (due to coordination with the utility companies); once the utility pole was moved the excavation was completed (during the time preparing to move the utility pole the excavation area was backfilled to grade). The IRM included:

- 1) Drums, drum contents, pieces of drums, and other related disposal debris (i.e. drum materials) encountered during excavation of the former disposal area were properly handled (i.e. overpacked), characterized and transported off-site for disposal;
- 2) On-site soil which exceeded the Unrestricted use Soil Cleanup Objectives (SCOs) (as defined by 6NYCRR Part 375-6.8) was excavated and transported off-site for proper disposal.

Approximately 51 overpack (i.e. 85-gallon capacity), and eight 55-gallon capacity drums were filled with drum materials excavated from the site; approximately 500 cubic yards of soil were removed. Clean fill meeting the requirements of 6 NYCRR Part 375-6.7(d) was brought in to replace the excavated soil and establish the design grades at the site.

### **6.3: Summary of Environmental Assessment**

This section summarizes the assessment of existing and potential future environmental impacts presented by the site. Environmental impacts may include existing and potential future exposure pathways to fish and wildlife receptors, wetlands, groundwater resources, and surface water.

Based upon the resources and pathways identified and the toxicity of the contaminants of ecological concern at this site, a Fish and Wildlife Resources Impact Analysis (FWRIA) was deemed not necessary for OU 01.

#### **Nature and Extent of Contamination:**

Remediation at the site is complete. Prior to the IRM remediation the contaminants of concern exceeded the applicable SCGs for soil. Surface water sampling did not show impacts from the site. Based on historic groundwater data the following contaminants had been detected above groundwater standards immediately downgradient of the site: methylene chloride, acetone, toluene, ethylbenzene, and xylene (total). Past investigations indicated that groundwater downgradient of the site may have been impacted, but additional investigation was conducted in October 2007; the 2007 investigation determined that there was some on-site soil contamination (acetone and lead, which was addressed by the IRM), but no groundwater contamination exceeding groundwater standards was found.

#### **Special Resources Impacted/Threatened:**

Recent groundwater data indicates no off-site impacts and the on-site disposal area has been removed as a part of the IRM which was performed in 2010 and 2011. As a result, there are no off-site impacts.

#### **6.4: Summary of Human Exposure Pathways**

This human exposure assessment identifies ways in which people may be exposed to site-related contaminants. Chemicals can enter the body through three major pathways (breathing, touching or swallowing). This is referred to as *exposure*.

All site contamination has been removed to unrestricted use soil cleanup objectives. Groundwater sampling indicates site-related contamination is not present in on-site groundwater. In addition, off-site homeowner well sampling indicates that groundwater contamination did not leave the site.

#### **6.5: Summary of the Remediation Objectives**

The objectives for the remedial program have been established through the remedy selection process stated in 6 NYCRR Part 375. The goal for the remedial program is to restore the site to pre-disposal conditions to the extent feasible. At a minimum, the remedy shall eliminate or mitigate all significant threats to public health and the environment presented by the contamination identified at the site through the proper application of scientific and engineering principles.

Since the IRM restored this site to pre-disposal conditions, there are no remedial action objectives necessary for this site.

### **SECTION 7: SUMMARY OF PROPOSED REMEDY**

Based on the results of the investigations at the site, the IRM that was performed to remove drums, drum remnants and impacted soil to achieve unrestricted use soil cleanup objectives, and the evaluation presented here, the Department is proposing No Further Action as the proposed remedy for the site. The Department believes that this remedy is protective of human health and the environment. Since there are no restrictions necessary for the use of the site or groundwater, no institutional controls or site management are required.



## **Exhibit A**

### **Nature and Extent of Contamination**

This section describes the findings of the Remedial Investigation for all environmental media that were evaluated. As described in Section 6.1, samples were collected from various environmental media to characterize the nature and extent of contamination.

For each medium, a table summarizes the findings of the investigation. The tables present the range of contamination found at the site in the media and compares the data with the applicable SCGs for the site. The contaminants are arranged into volatile organic compounds (VOCs) and inorganics (metals). For comparison purposes, the SCGs are provided for each medium that allows for unrestricted use. For soil, if applicable, the Restricted Use SCGs identified in Section 6.1.1 are also presented.

### **Groundwater**

Two rounds of groundwater samples were collected from overburden monitoring wells in 2007 during the remedial investigation, as indicated on Figure 2. The samples were collected to assess groundwater conditions on and off-site; the samples were analyzed for volatile organic compounds (VOCs) (all previously identified contaminants in the groundwater were VOCs). The results indicate that contaminant levels in shallow groundwater at and downgradient of the site do not exceed the SCGs. Since there were no elevated contaminant concentrations in the groundwater a table of results is not included. Private wells in the immediate vicinity of the site were also sampled with no site related contamination found.

No site-related groundwater contamination of concern was identified during the Site Investigation. Therefore, no remedial alternatives need to be evaluated for groundwater.

### **Soil**

In 2007 a remedial investigation was performed (as documented in the November 2008 Site Investigation Report) to fill data gaps. Specifically, these data gaps included defining the lateral and vertical extent of the disposal area. The conclusions presented in the November 2008 Site Investigation Report included a recommendation to address the waste disposal area at the site. An Excavation Plan was developed to perform a soil excavation Interim Remedial Measure (IRM) at the site.

Soil samples were collected during the IRM to document the concentrations of the contaminants of concern in the soil that remained at the site after the soil was excavated and disposed of off-site. The results indicate that all contaminants of concern in soil present at the site which exceeded the unrestricted SCGs were removed as a part of the IRM. Figure 3 shows the locations of the end point soil samples that were collected during the IRM; Table 1 presents the end point sample results for the site contaminants of concern.

**Table #1 - Soil**

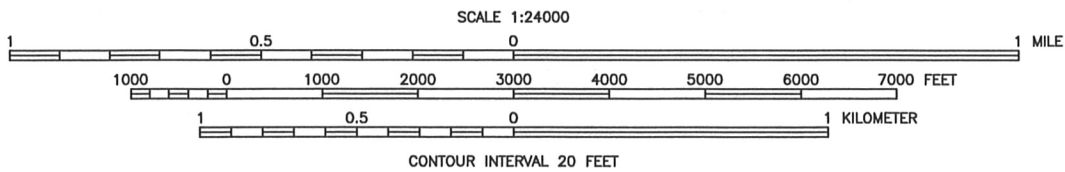
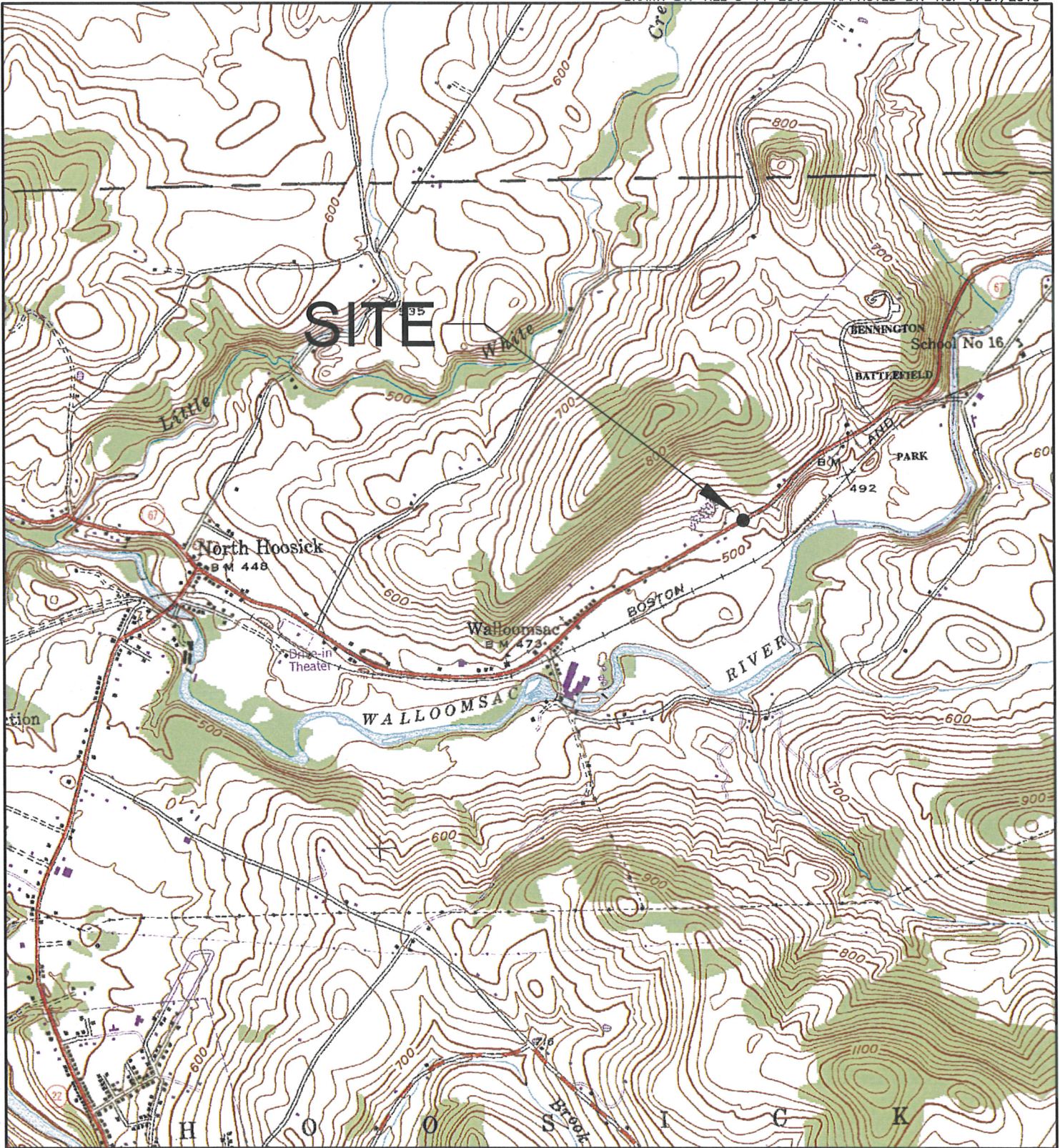
Detected Constituents	Concentration Range Detected (ppm) <sup>a</sup>	Unrestricted SCG <sup>b</sup> (ppm)	Frequency Exceeding Unrestricted SCG
Acetone	ND - .0094	.05	0/8
Lead	14 – 35.9	63	0/8

a - ppm: parts per million, which is equivalent to milligrams per kilogram, mg/kg, in soil;

b - SCG: Part 375-6.8(a), Unrestricted Soil Cleanup Objectives.

Soil contamination identified during the RI was addressed during the IRM described in Section 6.2.





ALEXANDER SCHMIGEL SITE  
HOOSICK FALLS, NEW YORK



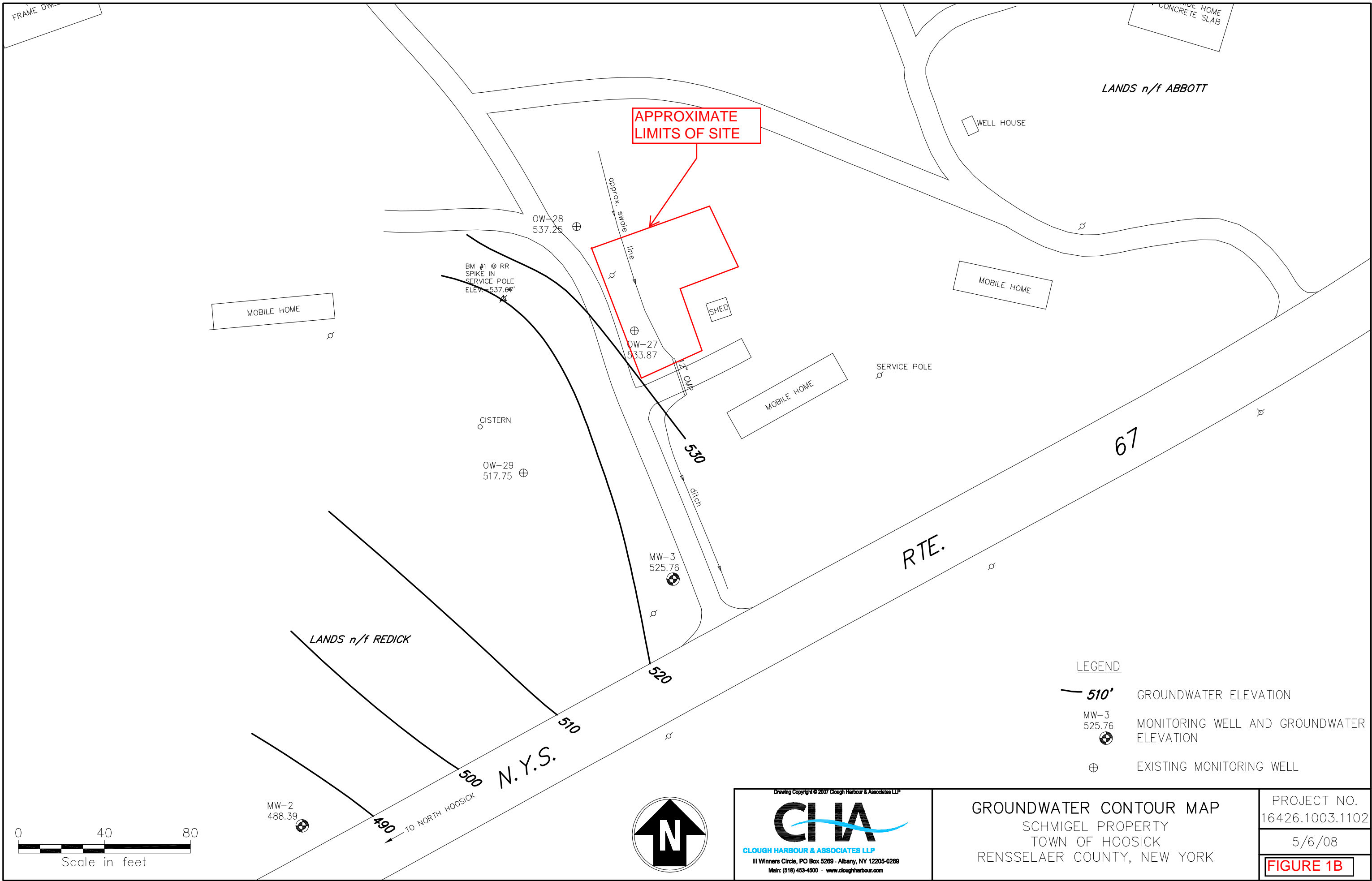
Environment & Infrastructure  
800 North Bell Avenue, Suite 200  
Pittsburgh, Pennsylvania 15106

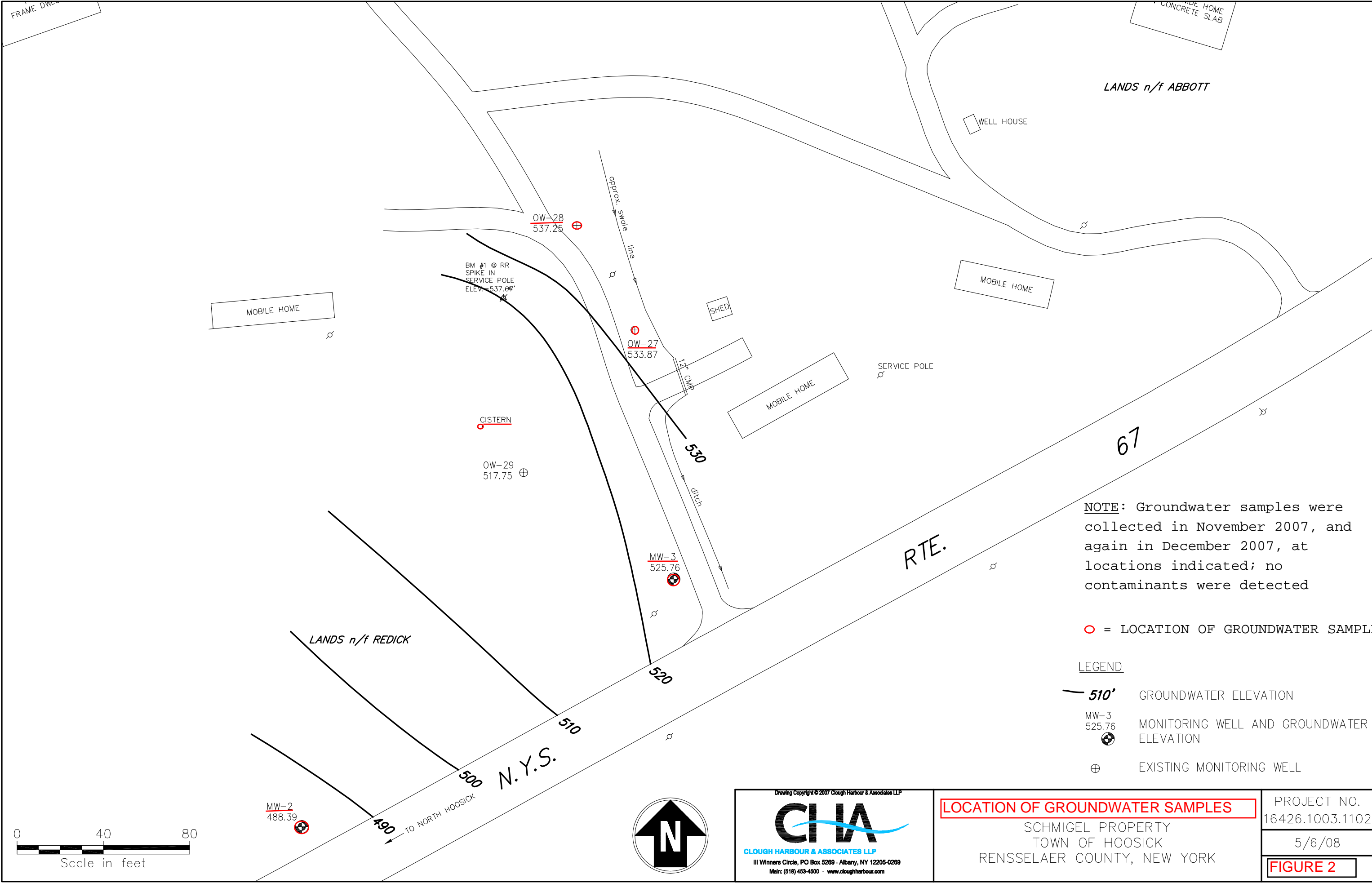
SITE LOCATION MAP

1



File: K:\16426\CADD\FIGURES\_SITE\16426\_FIG3\_12-07.DWG Saved: 5/6/2008 10:29:39 AM Plotted: 5/6/2008 10:38:07 AM User: Morey, James





P:\PROJECTS\Honeywell\Hoosick Falls, NY\3410100975\CADD\FINAL\IRM Report\Figure 2-3 Exc Area Confirm Samples 2013\_01\_08.dwg Fri, 11 Jan 2013 - 10:27am nancy.lagattuta

DRAWN BY: NEL 1-9-2013

APPROVED BY: -

