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Attention: Site Attorney (1 copy)

United States Department of Justice
Chief, Environmental Enforcement Section
Environment and Natural Resources Division
950 Pennsylvania Avenue, NW
Washington, DC 20530-0001
DOJ # (90-11-3-1575) (1 copy)

August 19, 2025

Subject: Malta Rocket Fuel Area Site – Malta, New York
Consent Decree 98-CV-0014 – Remedial Work Element IV
Addendum No. 1 to the O&M Manual Work Element IV

Dear Agency Officials:

Enclosed please find Addendum No. 1 to the Operations and Maintenance (O&M) Manual, Remedial Work Element IV Institutional Controls for the referenced site. This addendum documents the modifications to the site remedy, as described in the Explanation of Significant Differences, issued by United States Environmental Protection Agency (USEPA) in May 2018. Feel free to contact me if you have any questions regarding this project.

Sincerely,

Matthew Calacone
Senior Project Manager
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cc, electronic:

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enc, electronic: Addendum No. 1 to the O&M Manual Work Element IV

Addendum No. 1

Remedial Work Element IV Institutional Controls, Operations and Maintenance Manual

Project name **Malta Rocket Fuel Area Site**
 Project no. **1940102620**
 Recipient **GE Corporate**
 Document type **Final**
 Date **August 19, 2025**
 Description **Remedial Work Element IV Institutional Controls**

The environmental monitoring requirements for the Malta Rocket Fuel Area (MRFA), located in Malta, New York (Site), as documented in the *Operations and Maintenance Manual, Remedial Work Element IV Institutional Controls*, (IT Corporation, 1999) (Element IV O&M Manual), are hereby amended with changes put forth in this Addendum.

Background

As described above, the Element IV O&M Manual was originally submitted to the United States Environmental Protection Agency (USEPA), and subsequently revised, both in September 1999. An additional modification, relating solely to the reporting schedule, was approved by USEPA in June 2013.

Unless otherwise stated in this addendum, monitoring and maintaining the institutional controls will be performed in accordance with the Site documents:

- Element IV O&M Manual
- Site Health & Safety Plan

ESD Modifications

An Explanation of Significant Differences (ESD) was issued by USEPA, via email, in May 2018 to document and explain modifications to the Site remedy, as made by USEPA. The modifications discussed in the ESD are detailed below.

MODIFICATION 1: *Limit occupancy of existing buildings or new construction, on or within 200 feet of the Test Station property, unless appropriate vapor intrusion investigations are conducted and/or mitigation measures (including periodic monitoring) are implemented.*

Volatile organic compounds (VOCs) in groundwater, soil, or other sources can migrate as vapors into buildings, even if VOCs are present only at low levels. Although there is no current risk of exposure at the Test Station property based on the current use of that portion of the Site, USEPA has determined that vapor intrusion may be a concern for any existing buildings that may become occupied in the future, or if there is new construction at the Site within the Test Station property. To ensure the protectiveness of the remedy, USEPA deemed that additional institutional controls (ICs) are necessary to limit occupancy of existing buildings or new construction, on or within 200 feet of the Test Station property, unless appropriate vapor intrusion investigations are conducted and/or mitigation measures (including periodic monitoring) are implemented.

The existing Environmental Protection Easements and Declarations of Restrictive Covenants located within 200 feet of the Test Station Property were amended to include a provision requiring appropriate vapor intrusion investigations and periodic monitoring if existing buildings or new construction are occupied on each property. These properties are shown on **Figure 1** and are detailed in **Table 1** below.

Table 1. Existing Environmental Protection Easements and Declarations of Restrictive Covenants

Property Owner	Tax Parcel ID	Date Executed
GlobalFoundaries, U.S., Inc.	230.1-76.12 241.-1-3.112	September 23, 2024
County of Saratoga Industrial Development Agency	230.-1-23 230.-1-72.12	September 23, 2024
GlobalFoundaries Innovation, LLC	230.-1-76.111 230.-1-76.112 241.-1-4 241.-1-5 241.-1-50.1 241.-1-50.2	September 23, 2024

Annual interviews (via telephone or email) will be conducted with each of these three property owners. Specifically, the owner representatives will be asked about current and/or proposed changes in land use and groundwater usage, and about compliance with the notice requirements in each of the deed restrictions.

MODIFICATION 2: *Add the requirement for a Site Drum Management Plan (SDMP) to be developed and implemented whenever intrusive activities are planned on the Test Station property.*

During Site redevelopment activities in 2011 and 2014, buried drums and containers were encountered at locations on the Test Station Property. In response to these discoveries, USEPA added the requirement for an SDMP as an ESD modification.

The *Subsurface Drum Management Plan for Intrusive Activities Associated with Site Development, Malta Rocket Fuel Area Superfund Site* (General Electric, 2021) (Malta SDMP) was submitted to and approved by USEPA in response to the ESD modification. The SDMP provides for:

- the performance of an electromagnetic survey in any area of the Site where soil disturbance is planned;
- in areas where anomalies are identified, the excavation of any buried drums, containers, and soils impacted by hazardous substances;
- the sampling and analysis of drum content, soil, and groundwater (if encountered); and,
- the treatment and/or off-Site disposal of containers, soil, and groundwater.

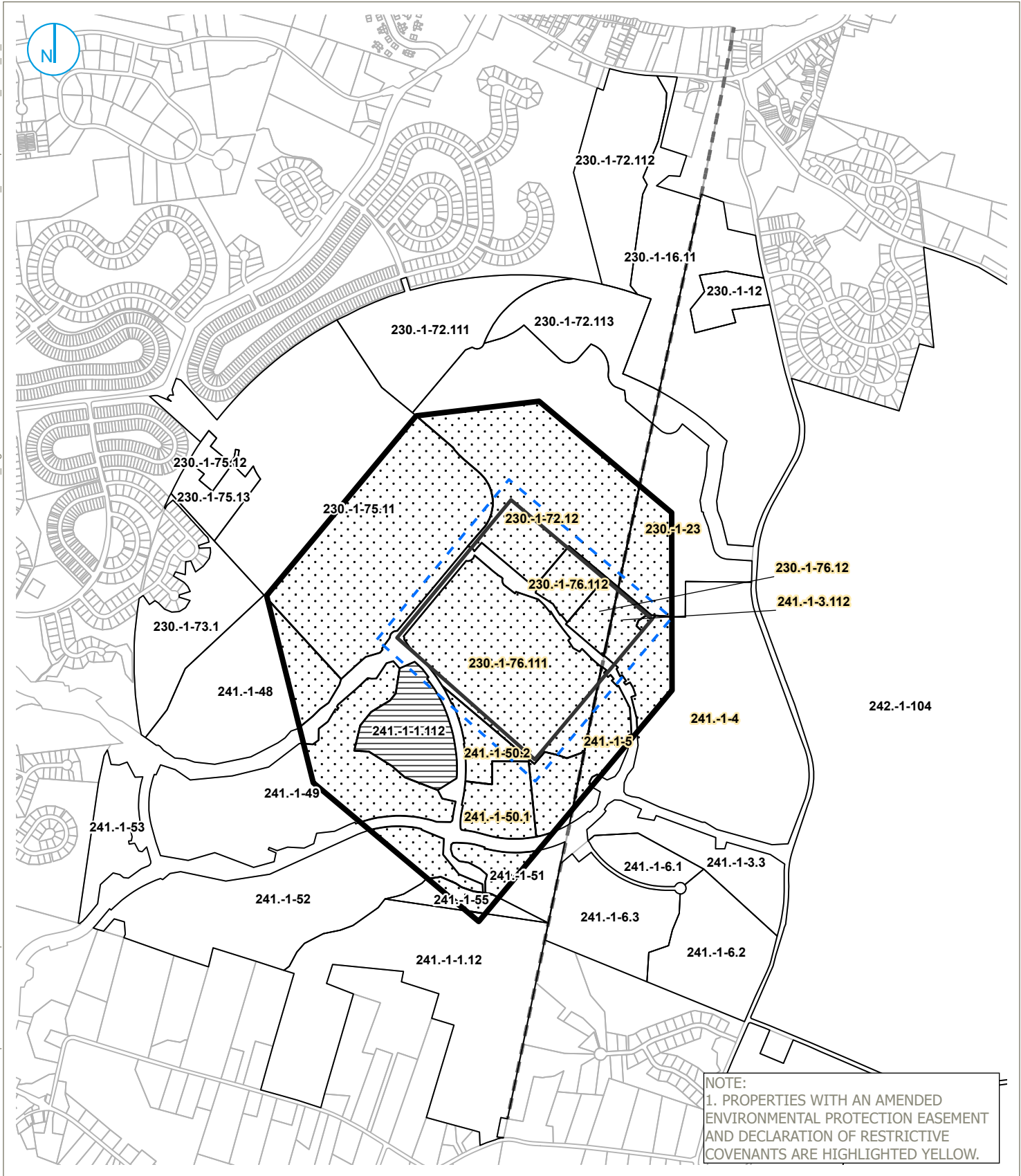
MODIFICATION 3: *Eliminate the air stripping of the Test Station groundwater for potable use.*

In 2010, the Saratoga County Water Authority completed the construction of a public water supply line that connected the Test Station property to the public water line. As a result, the onsite air stripper treatment system was decommissioned once the new water line was connected. The requirement of air stripping of Test Station groundwater for potable water use, as specified in the Element IV O&M Plan, is no longer applicable and was removed by this ESD modification.

References

General Electric Company, 2021. *Subsurface Drum Management Plan for Intrusive Activities Associated with Site Development, Malta Rocket Fuel Area Superfund Site*. March 2021.

IT Corporation, 1999. *Operation and Maintenance Manual, Remedial Work Element IV Institutional Controls*. September 9, 1999, revised September 27, 1999.



BUFFER ZONE AND EASEMENT BASEMAP

FIGURE 1

RAMBOLL AMERICAS
ENGINEERING SOLUTIONS, INC.
A RAMBOLL COMPANY



Malta Rocket Fuel Area Site
Malta, New York