

Mr. John DiMartino
Remedial Project Manager
USEPA, Region 2
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Subject:

Monitoring Well Decommissioning Report
Clothier Disposal Site
Granby, New York

ENVIRONMENT

Dear Mr. DiMartino:

Date:
October 10, 2017

This letter documents the monitoring well decommissioning activities completed at the Clothier Disposal Site (the site) located in Granby, New York. The Potentially Responsible Parties (PRPs) originally requested to discontinue groundwater monitoring at the site and decommission four monitoring wells located within the capped area of the site in its May 1, 2015 data evaluation report. The PRPs again requested written approval to decommission the wells in a May 17, 2017 e-mail to United States Environmental Protection Agency (USEPA). On May 30, 2017 the USEPA indicated (via e-mail) that decommissioning of the four wells was approved by both the USEPA and the New York State Department of Conservation (NYSDEC). A Well Decommissioning Work Plan was submitted to USEPA and NYSDEC on June 2, 2017 and approved (via e-mail) on June 14, 2017.

Contact:
Patrick Farr, P.E.

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919.280.9237

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Patrick.Farr@arcadis.com

Our ref:
B0063101

On July 12, 2017, Arcadis completed the decommissioning of monitoring wells (CBW-3, CBW-4S, CBW-4D and CBW-8, see Figure 1) at the Clothier site. Decommissioning activities were conducted in accordance with NYSDEC's CP-43 guidance document titled "Groundwater Monitoring Well Decommissioning Procedures" (August 2009).

All four wells were constructed of two-inch diameter, No. 304 stainless steel materials. The well heads were locked with expandable J-plugs and completed at the surface with steel stick-up protectors. All wells were installed in the overburden, and confining unit(s) were not penetrated during the installation activities.

Given the conditions above, well decommissioning activities were conducted as follows:

- Prior to decommissioning, each well was gauged to determine the bottom depth.
- A Type I Portland cement with four percent bentonite by weight grout was mixed and tremie-grouted to the bottom of each well until it was observed flowing from the top of the well.
- The surface completion and upper portion of the stainless steel riser were then removed at each of the well locations.
- An additional slug of grout was added to top off the casings and the surface areas were restored to match the surrounding area (topsoil).
- All solid waste materials generated during the decommissioning were subsequently disposed of properly.

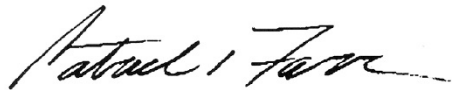
A copy of the well decommissioning records for monitoring wells CBW-3, CBW-4S, CBW-4D and CBW-8 are attached.

As documented in the PRPs' May 1, 2015 data evaluation report, the most recent groundwater monitoring data (see Figure 1) documents that groundwater at the site meets Maximum Contaminant Levels (MCLs). Further, the USEPA has stated in its most recent 5-year progress report (March 2013) that it does not believe that the level of contaminants in the soil are of concern to human health and the environment. Based on these facts, the Clothier Site PRPs are providing notice to the USEPA that the group's obligations under the 1989 RD/RA Consent Decree to provide post-closure operation, maintenance and monitoring, including groundwater monitoring and site inspection/maintenance at the Clothier Disposal Site have been fulfilled (see Consent Decree, Sec. 37). The PRPs are hereby requesting that USEPA confirm in writing that the PRPs have fulfilled their obligations and are thereby relieved of any further obligations to the Clothier Disposal Site. Once USEPA does so, the PRPs will, pursuant to Sec. 37 of the Consent Decree, notify the Court that entered the Consent Decree (United States District Court for the Northern District of New York), and the PRPs will then be released of any future responsibility for the site.

Please feel free to contact me by phone at 919.280.9237 or by e-mail at Patrick.Farr@arcadis.com if you have any questions or comments.

Sincerely,

Arcadis



Patrick Farr, P.E.
Principal Engineer

Copies:

Joel Singerman, USEPA
Harry Warner, NYSDEC
Virginia Capon, USEPA, Office of Regional Counsel

FIGURES



FIGURE 3
WELL DECOMMISSIONING RECORD

Site Name: <u>Clothier</u>	Well I.D.: <u>CBW-3</u>
Site Location: <u>367 S. Grandary Fulton N.Y.</u>	Driller: <u>D. Richmond</u>
Drilling Co.: <u>ARCADIS INC.</u>	Inspector: <u>T. O'ROURKE</u>
	Date: <u>7/12/17</u>

DECOMMISSIONING DATA (Fill in all that apply)		WELL SCHEMATIC*
OVERDRILLING		
Interval Drilled		
Drilling Method(s)		
Borehole Dia. (in.)		
Temporary Casing Installed? (y/n)		
Depth temporary casing installed		
Casing type/dia. (in.)		
Method of installing		
CASING PULLING		
Method employed		
Casing retrieved (feet)		
Casing type/dia. (in)		
CASING PERFORATING		
Equipment used		
Number of perforations/foot		
Size of perforations		
Interval perforated		
GROUTING		
Interval grouted (FBLS)	<u>18.65</u>	
# of batches prepared	<u>1</u>	
For each batch record:		
Quantity of water used (gal.)	<u>6</u>	
Quantity of cement used (lbs.)	<u>94 lbs.</u>	
Cement type	<u>TYPE-I</u>	
Quantity of bentonite used (lbs.)	<u>5 lbs.</u>	
Quantity of calcium chloride used (lbs.)	<u>—</u>	
Volume of grout prepared (gal.)	<u>8.5</u>	
Volume of grout used (gal.)	<u>7.0</u>	

COMMENTS: GROUT Bottom TO TOP. PULL
TOP 12.8 OF CASING & 5' 2" SS
SCREEN. BACK FILL WITH NATIVE
MATERIAL.

ARCADIS, D. Richmond
Drilling Contractor

* Sketch in all relevant decommissioning data, including:
interval overdrilled, interval grouted, casing left in hole,
well stickup, etc.

Department Representative

FIGURE 3
WELL DECOMMISSIONING RECORD

Site Name: <u>Clothier</u>	Well I.D.: <u>CBW-4D</u>
Site Location: <u>367 S. Grandby Rd. Fulton N.Y.</u>	Driller: <u>D. Richmond</u>
Drilling Co.: <u>ARCADIS inc.</u>	Inspector: <u>T. O'ROURKE</u>
	Date: <u>7/12/17</u>

DECOMMISSIONING DATA (Fill in all that apply)		WELL SCHEMATIC*	
OVERDRILLING		Depth (feet)	
Interval Drilled		0	4" PRO casing
Drilling Method(s)			Potted
Borehole Dia. (in.)			8 1/2"
Temporary Casing Installed? (y/n)			at 5.5'
Depth temporary casing installed		5	2" casing
Casing type/dia. (in.)			
Method of installing			
CASING PULLING		10	Riser
Method employed			1/2" screen left in hole
Casing retrieved (feet)		15	
Casing type/dia. (in.)		20	
CASING PERFORATING		25	
Equipment used		30	
Number of perforations/foot			
Size of perforations			
Interval perforated			
GROUTING			
Interval grouted (FBSL)	<u>28.90</u>		
# of batches prepared	<u>3</u>		
For each batch record:			
Quantity of water used (gal.)	<u>18</u>		
Quantity of cement used (lbs.)	<u>282</u>		
Cement type	<u>TYPE 1</u>		
Quantity of bentonite used (lbs.)	<u>15</u>		
Quantity of calcium chloride used (lbs.)	<u>—</u>		
Volume of grout prepared (gal.)	<u>22.5</u>		
Volume of grout used (gal.)	<u>21.0</u>		

COMMENTS: grout bottom to top, pull 4" PRO casing & 2" CB casing back fill with native material

* Sketch in all relevant decommissioning data, including:
interval overdrilled, interval grouted, casing left in hole, well stickup, etc.

ARCADIS, D. Richmond
Drilling Contractor

Department Representative

FIGURE 3
WELL DECOMMISSIONING RECORD

Site Name: <u>Clothier</u>	Well I.D.: <u>CBW-45</u>
Site Location: <u>367 S. Grand St. Fulton VA.</u>	Driller: <u>D. Richmond</u>
Drilling Co.: <u>ARCADIS</u>	Inspector: <u>T. O'ROURKE</u>
	Date: <u>7/12/17</u>

DECOMMISSIONING DATA (Fill in all that apply)		WELL SCHEMATIC*
OVERDRILLING		
Interval Drilled		
Drilling Method(s)		
Borehole Dia. (in.)		
Temporary Casing Installed? (y/n)		
Depth temporary casing installed		
Casing type/dia. (in.)		
Method of installing		
CASING PULLING		
Method employed		
Casing retrieved (feet)		
Casing type/dia. (in)		
CASING PERFORATING		
Equipment used		
Number of perforations/foot		
Size of perforations		
Interval perforated		
GROUTING		
Interval grouted (FBLs)	<u>18.35</u>	
# of batches prepared	<u>2</u>	
For each batch record:		
Quantity of water used (gal.)	<u>6</u>	
Quantity of cement used (lbs.)	<u>188</u>	
Cement type	<u>TYPE I</u>	
Quantity of bentonite used (lbs.)	<u>10</u>	
Quantity of calcium chloride used (lbs.)	<u>—</u>	
Volume of grout prepared (gal.)	<u>15</u>	
Volume of grout used (gal.)	<u>12</u>	
COMMENTS: <u>GROUT Bottom To Top, Pull Pro</u> <u>Casing & 2" Casing, Back Fill With</u> <u>Native Material</u>		<p>* Sketch in all relevant decommissioning data, including: interval overdrilled, interval grouted, casing left in hole, well stickup, etc.</p>

Drilling Contractor: ARCADIS, D. Richmond CWD.

Department Representative

FIGURE 3

WELL DECOMMISSIONING RECORD

Site Name: <u>Clothier</u>	Well I.D.: <u>CBW-8</u>
Site Location: <u>3675 Grandby St. Fulton VA.</u>	Driller: <u>D. Richmond</u>
Drilling Co.: <u>ARCADIS INC</u>	Inspector: <u>T. O'Rourke</u>
	Date: <u>7/12/17</u>

DECOMMISSIONING DATA (Fill in all that apply)		WELL SCHEMATIC*	
<u>OVERDRILLING</u>		Depth (feet)	
Interval Drilled		5	0' PULL 4.2' casing
Drilling Method(s)			2" S.S. casing left in hole
Borehole Dia. (in.)		10	
Temporary Casing Installed? (y/n)			
Depth temporary casing installed		15	
Casing type/dia. (in.)		20	
Method of installing		25	
<u>CASING PULLING</u>		30	
Method employed		35	
Casing retrieved (feet)			
Casing type/dia. (in.)			
<u>CASING PERFORATING</u>			
Equipment used			
Number of perforations/foot			
Size of perforations			
Interval perforated			
<u>GROUTING</u>			
Interval grouted (FBLs)	<u>30.25</u>		
# of batches prepared	<u>3</u>		
For each batch record:			
Quantity of water used (gal.)	<u>18.0</u>		
Quantity of cement used (lbs.)	<u>282.0</u>		
Cement type	<u>TYPE I</u>		
Quantity of bentonite used (lbs.)	<u>15</u>		
Quantity of calcium chloride used (lbs.)	<u>—</u>		
Volume of grout prepared (gal.)	<u>22.5</u>		
Volume of grout used (gal.)	<u>22.0</u>		

COMMENTS: GROUT Bottom TO TOP, PULL 4" PRO casing & PULL 4.2' S.S. RISER OUT OF HOLE. Back Fill with native material.

* Sketch in all relevant decommissioning data, including: interval overdrilled, interval grouted, casing left in hole, well stickup, etc.

ARCADIS, D. Richmond CWD.
Drilling Contractor

Department Representative

