Environmental Resources Management

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16 November 2018

Mr. Gary Priscott
New York State Department of Environmental Conservation
Region 7
1679 Route 11
Kirkwood, New York 13795-9772

RE: SSDS Corrective Measure Plan
Robintech/Compudyne, Inc. Site
Sanmina Corporation facility, Owego, New York
NYSDEC Site No. 754007

Dear Mr. Priscott,

On behalf of Sanmina Corporation (Sanmina), ERM has prepared this response to the New York State Department of Environmental Conservation (NYSDEC) letter dated 18 October 2018, which requested the development of a corrective measure plan for the sub-slab depressurization system (SSDS) at the Owego facility. Sanmina is recommending sequential evaluation of the effectiveness of the SSDs, which is outlined below.

Phase 1

Evaluation of sub-slab vacuum on a monthly basis at vacuum monitoring points using Magnehelic® Differential Pressure Gauges (Magnehelic). Magnehelics offer a quick means to collect differential pressure; however, at lower ranges they can be very sensitive and prone to inaccurate measurements. As a first step, we would like to evaluate how the vacuum measurements are collected. Sanmina will complete a vacuum monitoring event using both a digital manometer and Magnehelics. The results will be compared to determine if the vacuum/ pressure gauges used show different results. If there is a differential reading between the gauges and the manometer indicates there is vacuum under the slab; the NYSDEC and New York State Department of Health (NYSDOH) will be notified and a second monitoring event will be completed within one month to further assess the vacuum measurement techniques.

Phase 2

If the results of the first phase do not indicate there is adequate vacuum distribution, the vacuum monitoring points will be assessed/replaced. The locations of the current vacuum monitoring points were selected based on the use of the area at the time of installation, which placed restrictions on where they could be installed (e.g. active clean rooms, engineering office space, etc.). Many of the vacuum monitoring points are old and are not located in ideal locations (e.g. tight against walls, columns, etc.); further, Sanmina's use of the area has changed. Sanmina will replace the current vapor monitoring points with Vapor Pins® through the concrete slab away from walls or obstructions that have the potential to influence vacuum distribution under the building slabs. The Vapor Pins® will be installed following the manufacturer's procedures and will be helium tested to ensure a proper installation. Each of the Vapor Pins® will be installed with a flush-mount security cover to protect the vacuum monitoring point and to minimize interference with facility operations.

Vacuum at each of the newly installed monitoring point/ Vapor Pins® will be measured as outlined in Phase 1. If data indicates there is vacuum in the portion of the building where vacuum is being applied, a second confirmatory monitoring event will be completed within one calendar month.

Phase 3

If the effectiveness of the SSDS cannot be confirmed with the first two proposed phases of evaluation, an indoor air sampling event will be completed. Prior to conducting the sampling event, a pre-sampling building inspection will be performed to inventory products and chemicals used and/or stored within the facility, consistent with the NYSDOH guidance. Three indoor air sample locations (one in the Broadway Building and two in the main building) will be selected in areas not affected by overhead heating or ventilation. A properly calibrated PID equipped with an 11.7-electronvolt lamp will be used to screen for VOCs in the ambient indoor and outdoor air at each sampling location.

6-liter SUMMA® canisters with calibrated flow controllers set for an 8 hour testing period will be supplied by an Environmental Laboratory Accreditation Program laboratory. The indoor-air samples will be collected with the sample inlet positioned approximately 3 to 5 feet above the floor surface to represent the "breathing zone." One

outdoor ambient-air sample will be collected at location upwind of the building, and the sample inlets will be placed approximately 5 feet above the ground surface. The vacuum on the SUMMA® canister flow controller will be recorded at the start and end of the 8 hour sampling period. Following the sampling event, the canister's valve will be closed and the Swagelok®-type nut was placed over the inlet and secured. The vacuum will be recorded on the chain-of-custody (COC) to demonstrate that the seal on the canister has not been compromised in transit to the project laboratory. The samples will be managed under COC protocols and will be submitted to the project laboratory for VOC analysis by USEPA Method TO-15. A third party will validate these data.

Reporting

ERM is requesting a three-month extension on the Periodic Review Report (PRR) as required by NYSDEC to allow the findings and any associated analytical results from the analyses described above to be included in the PRR. ERM believes the actions described in this document will satisfy the Corrective Measures Work Plan required by NYSDEC and NYSDOH. If the proposed evaluation determines the SSDS is no longer protective of human health, additional corrective measures will be evaluated and recommendations for next steps will be made in the PRR.

If you should have any questions regarding this proposed corrective action plan, please contact the undersigned at (315) 233-3038 or via e-mail rob.sents@erm.com.

Sincerely,

Robert Sents

Rob Sents
Senior Project Manager

cc: Julia Kenney, NYSDEC
Johannes Peeters, Tioga County Department of Health
Maureen Schuck, NYSDOH
Harry Warner, NYSDEC
Earl Kimble, Sanmina
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