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August 17, 2011 NY09-2480-22

Mr. Timothy Schneider
New York State Department of Environmental Conservation
Division of Environmental Remediation, Region 8
6274 East Avon-Lima Road
Avon, NY 14414-9519

RE: Former Sperry Remington Site (#808043) (Site)
Remedial Investigation/Feasibility Study Work Plan Addendum #2
City of Elmira, Chemung County, New York

Dear Mr. Schneider:

On behalf of Unisys Corporation (Unisys), Advanced GeoServices Engineering P.C. (AGE) is submitting this Remedial Investigation/Feasibility Study (RI/FS) Work Plan Addendum #2 in response to the New York State Department of Environmental Conservation's (NYSDEC) August 8, 2011 e-mail requesting sediment sampling within the culvert on-site. Attachment A to this Addendum #2 includes Supplemental Health and Safety Procedures to address these new field activities (specifically, entering the culvert).

BACKGROUND

A camera survey of the entire length of the culvert was performed on July 12, 2011. The culvert was determined to have two configurations. The initial 175 feet of the culvert (from the west) is a box culvert and the remaining length (approximately 100 feet) appears to be circular. The survey identified a structure connected to the culvert (possibly oil skimmer #2) approximately 58 feet into the culvert from the west side. A weir was also located approximately 88 feet from the west side of the culvert. Three additional pipe connections, two from the north and one from the south were identified. The degree of sedimentation varied significantly between a few inches to a few feet within the culvert.

SEDIMENT SAMPLING

Locations

Sediment samples will be collected at the following four locations within the culvert:

- Immediately within the culvert on the west side and upstream, if possible, from the pipe connection on the south side of the culvert;
- Approximately 5 feet upstream of the pipe connection at 30 feet from the west end and on the north side of the culvert;

- Immediately upstream of the weir (approximately 85 feet from the west end) and downstream of the potential oil skimmer connection; and,
- Approximately 20 feet upstream from the east end of the culvert.

The exact sampling locations may vary a few feet upstream or downstream based on the amount of sediment at the initially-measured location.

Sample Collection and Analysis

The inside of the culvert typically has standing water or a small amount of flow. Therefore, sediment sampling will be performed through the water column. A surface sample (0 to 6 inches from the bottom of the culvert) will be collected at each location using methods previously described in the RI/FS Work Plan. Subsurface sediment samples will be attempted at the weir location and the furthest east location where sediment thickness is believed to be the greatest. Each sample will be analyzed for the following parameters on a standard turn-around time basis:

- Target Compound List (TCL) Semi-volatile organic compounds (SVOCs) by Method 8270C;
- TCL Volatile organic compounds (VOCs) by Method 8260B;
- Target Analyte List (TAL) Inorganics by Methods 6010B/7471A;
- TCL Pesticides by Method 8081A;
- PCBs by Method 8082;
- Hexavalent Chromium by Method 7196A; and,
- Total Cyanide by Method 9012A.

Sample handling, testing, documentation and decontamination protocols will be utilized in accordance with applicable sections in the Field Sampling Plan and Quality Assurance Project Plan.

Sediment Quantity Assessment

The depth of sediment varies significantly throughout the length of the culvert. In addition, it is unknown if the box culvert portion has a bottom section. Therefore, the depth of sediment will be estimated manually using a metal bar and measuring tape at 25 foot intervals within the culvert, as necessary.

REPORTING

The results and findings of the sampling shall be included in the routine monthly progress report for the Site, and the subsequent interim report for the initial investigation.

Please contact Kevin Krueger at Unisys or Steve Kirschner if you have any questions regarding this work plan addendum. As previously discussed, implementation of Addendum #2 is tentatively scheduled to start on August 24, 2011 pending NYSDEC's approval, access approval by Southern Tier Commerce Center and weather conditions.

Sincerely,

ADVANCED GEOSERVICES ENGINEERING P.C.

Matthew Potter
Staff Professional

Stephen W. Kirschner, P.E.
Senior Project Consultant

MP:SWK:vm

cc: Kevin Krueger, Unisys
David Noble, Unisys
Adam Meinstein, Southern Tier Commerce Center
Kevin Murphy, Wladis Law Firm
John H. Paul, Beveridge & Diamond
Micheal G. Murphy, Beveridge & Diamond

ATTACHMENT A

Supplemental Site Specific Health and Safety Plan

SUPPLEMENTAL SITE SPECIFIC HEALTH AND SAFETY PLAN

FORMER SPERRY REMINGTON SITE (#808043)
REMEDIAL INVESTIGATION/FEASIBILITY STUDY
WORK PLAN ADDENDUM #2
CITY OF ELMIRA, CHEMUNG COUNTY, NEW YORK

INTRODUCTION

On behalf of Unisys Corporation (Unisys), Advanced GeoServices Engineering P.C. (AGE) developed a Remedial Investigation/Feasibility Study (RI/FS) Work Plan Addendum #2 in response to the New York State Department of Environmental Conservation's (NYSDEC) August 8, 2011 e-mail requesting sediment sampling within the culvert on-site.

The Site is a 185' X 65' rectangle (0.28 acres) which includes a 12' covered concrete culvert which extends from the former holding pond, beneath the Pennsylvania Line LLC Railroad track owned by Norfolk Southern and discharging into a drainage swale. A camera survey of the entire length of the culvert was performed on July 12, 2011. A more detailed description of the culvert is presented in the RI/FS Work Plan Addendum #2. The adjacent off-site area consists of approximately 5.5 acres of wetlands with a drainage channel and two outfalls to Coldbrook Creek. The drainage channel varies in width from 2' to 30' wide and depth from 1' to 3' deep. Coldbrook Creek is about 10' wide and 3' deep on average.

The evaluation of sediments within the culvert will include the following:

- Step 1 – Sediments samples will be collected from four (4) locations within the culvert. The sediment samples will be collected and analyzed in accordance with the procedures presented in the RI/FS Work Plan Addendum #2.
- Step 2 – A sediment quantity assessment will be performed within the culvert. This assessment will be conducted in accordance with the procedures presented in the RI/FS Work Plan Addendum #2.
- Step 3 – The results and findings of Steps 1 and 2 shall be presented, as necessary, in a letter report to NYSDEC.

The above-referenced activities will be conducted in accordance with the RI/FS Work Plan Site Specific Health and Safety Plan dated November 11, 2011 and the supplemental health and safety procedures described below.

STEPS 1 AND 2 SUPPLEMENTAL HEALTH AND SAFETY PROCEDURES

Non-Permit Required Confined Space Entry Procedures

Entry into the Site's culvert has been identified as a non-permit required confined space entry[1]. A non-permit required confined space, by definition, poses no hazard to an employee more serious than its restricted means of entry and exit. Therefore, provided that the work to be performed lacks any potential to create a prohibited or unacceptable condition, entry to the Sites culvert (a non-permit-required confined space) will proceed as described below.

- Personnel protective equipment (PPE) will include Level D and the use of chest high waders;

[1] The RI/FS Work Plan Site Specific Health and Safety Plan dated November 11, 2011 did not address or allow entry into the Site's culvert.

- Pre-entry and continuous personnel air monitoring will be conducted when entering the Site's culvert;
- Safe means of communication will be provided; and,
- Appropriate lighting and/or equipment (e.g., safety harness and rope) will be utilized for safe entry and exit by entrants.

The following steps will be taken upon entry into the culvert:

1. Visually assess the amount and velocity of flowing water entering the culvert to determine if entry is can be performed without risk of engulfment. Entry is prohibited if currently raining or significant rainfall has occurred within the previous 12 hours.
2. An approved safety harness with an attached line (minimum of 250 feet) of at least 1/2" diameter, 2,000 lb test, and attached outside the entry opening must be worn and used.
3. At least one person (standby), with rescue training, first aid training, and appropriate respiratory protection must be immediately available and must remain outside the confined space to give assistance in case of emergency.
4. At least one other person who may have other duties must be within sight or call of the standby person.
5. The standby can enter the confined space only in case of emergency and only after alerting at least one other person outside of the confined space of intent to enter, and the existence of an emergency.
6. An effective means of communication between the entrant(s) and the standby must be provided and tested prior to entry if the entrant is out of sight of the standby.
7. Air monitoring will be conducted as discussed below.

Air Monitoring

Pre-entry and continued air monitoring within the Site's culvert shall be conducted to confirm the anticipated safe environment. Pre-entry and continued air monitoring of volatile organic compounds (VOCs), oxygen and the lower explosive level (LEL) shall be conducted within the Site's culvert. Note that there is no identified source of VOCs, oxygen depletion or flammable atmosphere in the Site's culvert.

Monitoring of airborne vapors for VOCs will be performed using an organic vapor meter (OVM) with a flame ionization FID) or photoionization detector (PID). Monitoring for the oxygen concentration and LEL will be performed using an oxygen meter and explosive meter, respectively. The following atmospheric conditions are required for initial or continued entry within the Site's culvert. The parameters below are the only potential hazardous parameters anticipated for entry into the culvert.

- Oxygen concentrations must be between 19.5% and 23.5%.
- Flammable gas, vapor, or mist concentrations must be less than 10% of the lower explosive limit.
- (LEL) (using methane as reference gas).

- Volatile compounds measured via a photoionization detector (PID) or flame ionization detector.
- (FID) must be less than 5 parts per million (ppm).

If the air meters are equipped with audible alarms: the above parameters will be programmed in the meters. The form presented as Attachment 1 will be used to document the entry into the Site's culvert.

STEP 3 SUPPLEMENTAL HEALTH AND SAFETY PROCEDURES

No supplemental health and safety procedures are necessary when conducting the Step 3 reporting activities.

Attachment 1
Site-Specific Confined Space Non-Permit Certificate

Month _____ **Date** _____ **Year** _____ **Project #** _____

To use this Certificate:

- Actual or potential atmospheric hazards do not exist in this space
- Nonatmospheric hazards do not exist in this space or have been eliminated without entry
- Communication methods established between entrant and the attendant
- Entrants are informed to exit the space if any hazard is observed
- Normal activities for all non-permit required confined spaces require pre-entry O2 and LEL monitoring

Meter Model:
Tag No.:
Capabilities: □ O_2 □ % LEL □ H_2S □ CO □ VOCs

Non-Permit Spaces Entered

Confined Space Area	Fall Protection Required (Y/N)	Lockout Required (Y/N)	Time of Atmospheric Monitoring	% O_2 (19% < O_2 < 23.5%)	% LEL (< 10% of LEL)	Volatile Organic Compounds (< 5 ppm)	Entrant Initials	Attendant Initials	Time Work Conducted