

# NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Division of Environmental Remediation, Region 8

6274 East Avon-Lima Road, Avon, NY 14414-9516

P: (585) 226-5353 | F: (585) 226-8139

www.dec.ny.gov

## Via E-mail

July 8, 2021

Mr. Kevin Krueger, PE  
Unisys Corporation  
Corporate Environmental Affairs  
3199 Pilot Knob Road  
Eagan, MN 55121

**Re: Revised Site Characterization Work Plan Addendum #4  
Former Scott Technologies Site (#p808049)  
1051 South Main Street, City of Elmira, Chemung County, NY**

Dear Mr. Krueger:

The New York State Department of Environmental Conservation (NYSDEC), in consultation with New York State Department of Health (NYSDOH), has completed its review of the document entitled " Revised Site Characterization Work Plan Addendum #4 – Former Scott Technologies Site (#p808049)", dated April 22, 2021 and **Approve as Modified below:**

### **General**

1. "The objective of the SC Work Plan addendum is to complete characterization of constituents of potential concern (COPCs) in soils following the completion of a Shallow Soil Interim Remedial Measure (IRM) in June 2020." Agency modifications provided are intended to delineate areas of known impacts in shallow soils and further inform the potential for human exposure to site contaminants. Additional sampling locations and depths are provided within the attached marked-up figure and table.
2. Constituents above restricted residential SCO comparison criteria require lateral and vertical delineation (below 2'bgs) adjacent to residential properties to evaluate potential exposure and off-site migration.
3. Previous Site Characterization: "The current land use of the STCC facility is industrial and surrounding areas residential / school."
4. Proposed Scope of Work:
  - a. Full suite analyses will be completed at 25 % of all samples. Full suite includes PCBs, Metals, SVOCs, VOCs and emerging contaminants (ECs).
  - b. Full suite analyses must also be completed at all property boundary sample locations and depths (2 ft minimum) including South of Building 88 proposed sample locations B215, B216, B218, B219, and B220 as well as the previously selected work plan Outside FRA full suite locations B251, B253, B256, B272, B275 and B276.

**Soil Characterization – South of Building 88 Area, Figures 2A to 4C and 8:**

5. Figure 2C-3: Complete additional SVOC delineation of excavation 1-6 for SVOCs. The IRM work plan indicated that SVOCs were present and delineation samples were not completed prior to IRM actions; confirmation samples only included PCBs.
6. Excavation 1-1 and 2-1: Complete vertical delineation of Post-excavation bottom sample B031 (exceeding at 0.5 ft) for Metals and SVOCs (0.17-1 ft and contingent 1-2 ft bgs).
7. Excavation 1-4: Complete lateral and vertical delineation of Post-excavation sidewall samples S011 and S021 (exceeding at 0-0.5 ft bgs) for SVOCs (STI-I and STI-J; 0.17-1 ft, and 1-2 ft bgs).
8. Excavation 1-4 and 1-5: Complete vertical delineation of Post-excavation bottom samples B004, B005, B007, B008 and B009 (exceeding at 0-0.5 ft bgs) for SVOCs (0.17-1 ft and contingent 1-2 ft bgs).
9. MSA: Complete lateral delineation of Post-excavation MSA samples MSA-B011, MSA-B010, MSA-B009, MSA-B014 and MSA-B007 (0-0.17 ft bgs) for PCBs. Proposed soil samples B210, B237, B239, B240 and B265 are required to be collected from the 0-0.17 ft bgs interval for the MSA sample PCB delineation.
10. Figure 8: Samples STI-H, STI-J and STI-I must be analyzed.

**Health & Safety**

11. Health and Safety: Provide a Community Air Monitoring Plan (CAMP) and Special Requirements CAMP for agency approval 10 days prior to Work Plan implementation.

Within 15 days of this letter, please elect in writing to accept the Department modified work plan or take other action in accordance with the consent order.

Please contact me at (585) 226-5480 if you have any questions regarding this letter.

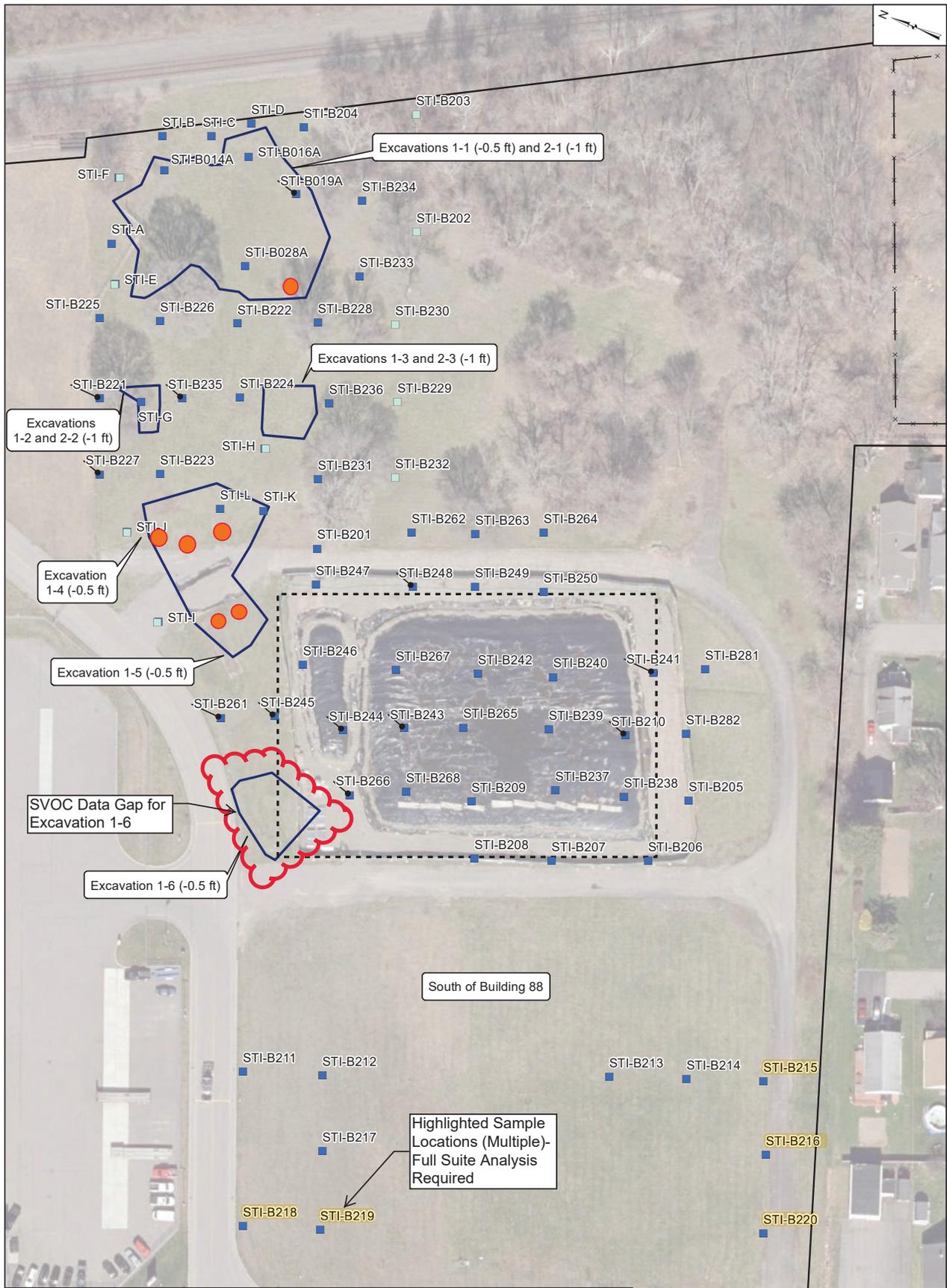
Sincerely,



Timothy Schneider, P.E.

Professional Engineer 1

P. Brookner / A. Krasnopoler / E. Tollefsrud  
D. Pratt / M. Cruden  
S. Bogardus / J. Deming  
H. Austin / P. Sylvestri / J. Magliocca



**Property Parcels**

- Site Boundary
- FRA Fence

- Proposed Sample Location
- Proposed Sample Location - Sample & Hold

**Excavation Limit**

- MSA
- Excavation Limit

**Notes and Disclaimer**

Screening criteria for the Site are Residential Soil Cleanup Objectives (6 NYCRR Part 375). See text for details. Georeferenced items may include historical site features, hand-drawn features, features that were not to scale, or features that were originally on a map that contained a different projection. Inherently, georeferencing introduces slight distortions and inaccuracies in spatial data, but these distortions and inaccuracies may be exacerbated by the factors listed above. All reasonable efforts were made to accurately reflect the data provided.

Aerial imagery accessed via ArcGIS Online and provided by Microsoft on 29 March 2021. Image is dated 2 June 2010.  
 STCC - Southern Tier Commerce Center FRA - Former Recreation Area ft bgs - feet below ground surface



**Sampling Plan - South of Building 88**

Former Scott Technologies Site #808049  
 Elmira, New York

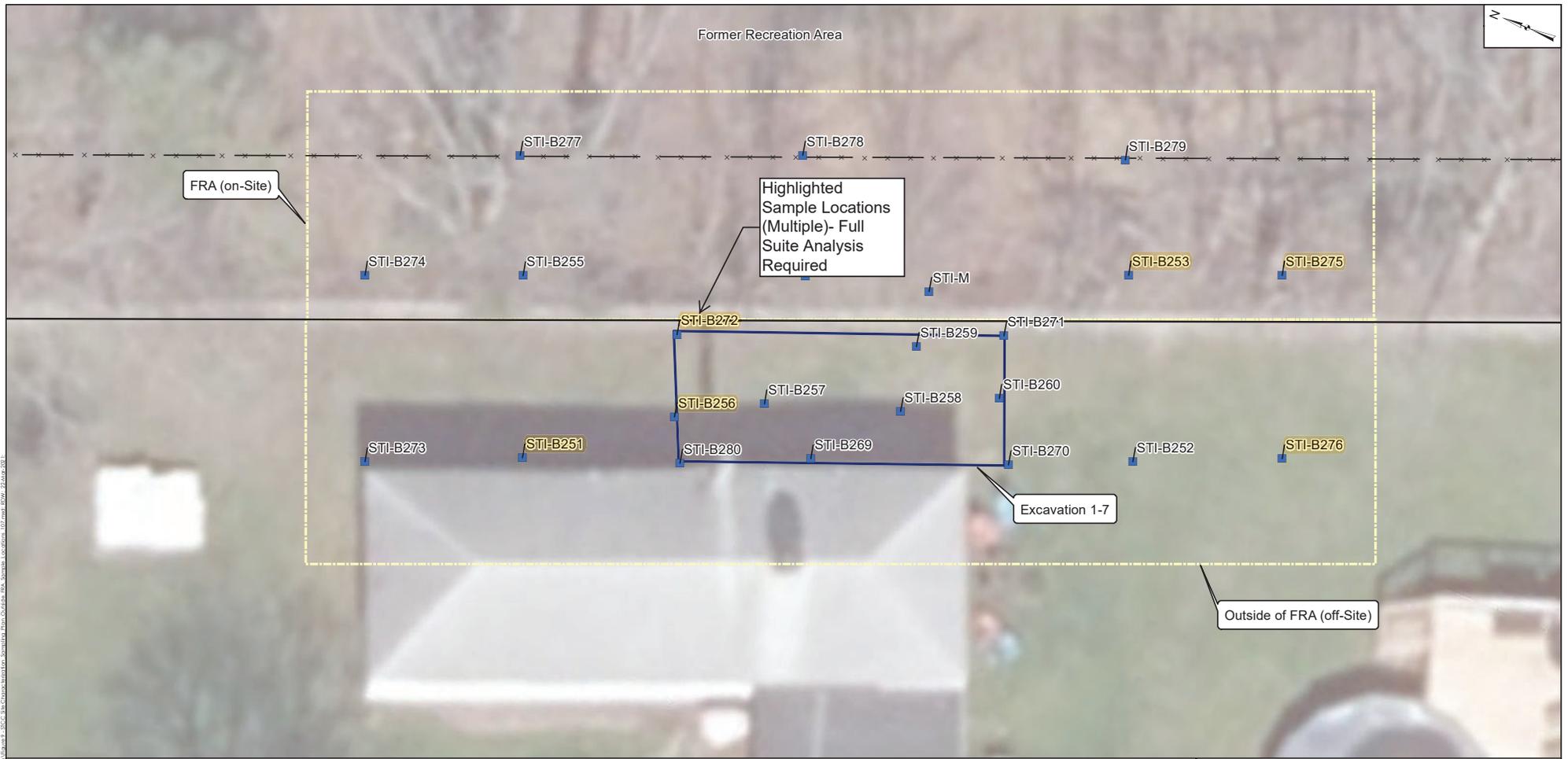
**B&B Engineers & Geologists**  
 of new york, p.c.  
*an affiliate of Geosynce Consultants*

Columbia, Maryland

March 2021

**Figure**

**8**



**Legend**

Site Boundary  
  Excavation Limit  
 ■ Proposed Sample Location  
 FRA Fence

**Notes and Disclaimer**  
 Screening criteria for the Site are Residential Soil Cleanup Objectives (6 NYCRR Part 375). See text for details.  
 Georeferenced items may include historical site features, hand-drawn features, features that were not to scale, or features that were originally on a map that contained a different projection. Inherently, georeferencing introduces slight distortions and inaccuracies in spatial data, but these distortions and inaccuracies may be exacerbated by the factors listed above. All reasonable efforts were made to accurately reflect the data provided.

Aerial imagery accessed via ArcGIS Online and provided by Microsoft on 22 March 2021. Image is dated 2 June 2010.  
 STCC - Southern Tier Commerce Center      FRA - Former Recreation Area      ft bgs - feet below ground surface

20      10      0 Feet 	
<b>Sampling Plan – Outside FRA</b> Former Scott Technologies Site #808049 Elmira, New York	
<b>B&amp;B Engineers &amp; Geologists</b> <i>of new york, p.c.</i> <small>an affiliate of Geosyntec Consultants</small>	
Columbia, Maryland	March 2021
<b>Figure 9</b>	

Revised Site Characterization Work Plan Addendum #4

UPDATED TABLE 3 - Proposed Soil Sampling Former Scott Technologies Site #808049 Elmira, New York

Sample ID	Sample Area	ECs			VOCs			PCBs			SVOCs			Metals			Rationale
		0-0.17 ft bgs	0.17-1 ft bgs	1-2 ft bgs	0-0.17 ft	0.17-1 ft	1-2 ft bgs <sup>4</sup>	0-0.17 ft	0.17-1 ft	1-2 ft bgs <sup>7</sup>	0-0.17 ft	0.17-1 ft	1-2 ft bgs <sup>10</sup>	0-0.17 ft	0.17-1 ft	1-2 ft bgs <sup>13</sup>	
STI-B031A	Excavation 1-1 and 2-1											X	H		X	H	Vertical delineation for Metals and SVOCs
STI-B202	Excavation 1-1 and 2-1											H	H	H	H	H	Lateral delineation of Metals and SVOCs in Excavation 1-1 and 2-1
STI-B203	Excavation 1-1 and 2-1											H	H	H	H	H	Lateral delineation of Metals and SVOCs in Excavation 1-1 and 2-1
STI-B204	Excavation 1-1 and 2-1											X	X	X	X	X	Lateral delineation of Metals and SVOCs in Excavation 1-1 and 2-1
STI-B222	Excavation 1-1 and 2-1											X	X	X	X	X	Lateral delineation of Metals and SVOCs in Excavation 1-1 and 2-1
STI-B225	Excavation 1-1 and 2-1											X	X	X	X	X	Lateral delineation of Metals and SVOCs in Excavation 1-1 and 2-1
STI-B226	Excavation 1-1 and 2-1											X	X	X	X	X	Lateral delineation of Metals and SVOCs in Excavation 1-1 and 2-1
STI-B228	Excavation 1-1 and 2-1											X	X	X	X	X	Lateral delineation of Metals and SVOCs in Excavation 1-1 and 2-1
STI-B230	Excavation 1-1 and 2-1											H	H	H	H	H	Lateral delineation of Metals and SVOCs in Excavation 1-1 and 2-1
STI-B233	Excavation 1-1 and 2-1											X	X	X	X	X	Lateral delineation of Metals and SVOCs in Excavation 1-1 and 2-1
STI-B234	Excavation 1-1 and 2-1											X	X	X	X	X	Lateral delineation of Metals and SVOCs in Excavation 1-1 and 2-1
STI-B014A	Excavation 1-1 and 2-1 Excavation 1-2 and 2-2												X	X		X	Vertical delineation of Metals and SVOCs in Excavation 1-2 and 2-2
STI-B016A	Excavation 1-1 and 2-1 Excavation 1-2 and 2-2												X	X		X	Vertical delineation of Metals and SVOCs in Excavation 1-2 and 2-2
STI-B019A	Excavation 1-1 and 2-1 Excavation 1-2 and 2-2												X	X		X	Vertical delineation of Metals and SVOCs in Excavation 1-2 and 2-2
STI-B028A	Excavation 1-1 and 2-1 Excavation 1-2 and 2-2												X	X		X	Vertical delineation of Metals and SVOCs in Excavation 1-2 and 2-2
STI-B221	Excavation 1-2 and 2-2											X	X	X			Lateral delineation of SVOCs in Excavation 1-2 and 2-2
STI-B223	Excavation 1-2 and 2-2											X	X	X			Lateral delineation of SVOCs in Excavation 1-2 and 2-2
STI-B227	Excavation 1-2 and 2-2											X	X	X			Lateral delineation of SVOCs in Excavation 1-2 and 2-2
STI-B235	Excavation 1-2 and 2-2											X	X	X			Lateral delineation of SVOCs in Excavation 1-2 and 2-2
STI-A	Excavation 1-2 and 2-2														X	X	Lateral delineation of Metals in Excavation 1-2 and 2-2
STI-B	Excavation 1-2 and 2-2											X	X	X	X	X	Lateral delineation of Metals and SVOC in Excavation 1-2 and 2-2
STI-C	Excavation 1-2 and 2-2											X	X	X	X	X	Lateral delineation of Metals and SVOC in Excavation 1-2 and 2-2
STI-D	Excavation 1-2 and 2-2											X	X	X	X	X	Lateral delineation of Metals and SVOC in Excavation 1-2 and 2-2
STI-E	Excavation 1-2 and 2-2											X	X	H			Lateral delineation of SVOCs in Excavation 1-2 and 2-2
STI-F	Excavation 1-2 and 2-2											X	X	H			Lateral delineation of SVOCs in Excavation 1-2 and 2-2
STI-G	Excavation 1-2 and 2-2													X			Vertical delineation of SVOCs below 1ft in Excavation 1-2 and 2-2
STI-B224	Excavation 1-3 and 2-3											X	X	X			Lateral delineation of SVOCs in Excavation 1-3 and 2-3
STI-B229	Excavation 1-3 and 2-3											H	H	H	H	H	Lateral delineation of Metals and SVOCs in Excavation 1-3 and 2-3
STI-B231	Excavation 1-3 and 2-3											X	X	X			Lateral delineation of SVOCs in Excavation 1-3 and 2-3
STI-B232	Excavation 1-3 and 2-3											H	H	H			Lateral delineation of SVOCs in Excavation 1-3 and 2-3
STI-B236	Excavation 1-3 and 2-3											X	X	X			Lateral delineation of SVOCs in Excavation 1-3 and 2-3
STI-H	Excavation 1-3 and 2-3											X	X	X			Lateral delineation of SVOCs in Excavation 1-3 and 2-3
STI-I	Excavation 1-4											X	X	X			Lateral delineation of SVOCs in Excavation 1-4
STI-J	Excavation 1-4											X	X	X			Lateral delineation of SVOCs in Excavation 1-4
STI-K	Excavation 1-4											X	X				Vertical delineation of SVOCs below 0.5ft Excavation 1-4
STI-L	Excavation 1-4											X	X				Vertical delineation of SVOCs below 0.5ft Excavation 1-4
STI-B004A	Excavation 1-4 and 1-5											X	H				Vertical delineation of SVOCs in Excavation 1-4 and 1-5
STI-B005A	Excavation 1-4 and 1-5											X	H				Vertical delineation of SVOCs in Excavation 1-4 and 1-5
STI-B007A	Excavation 1-4 and 1-5											X	H				Vertical delineation of SVOCs in Excavation 1-4 and 1-5
STI-B008A	Excavation 1-4 and 1-5											X	H				Vertical delineation of SVOCs in Excavation 1-4 and 1-5
STI-B009A	Excavation 1-4 and 1-5											X	H				Vertical delineation of SVOCs in Excavation 1-4 and 1-5
STI-XXX	Excavation 1-6											X	X	X			Additional SVOC delineation required for Excavation 1-6
STI-B256	Excavation 1-7	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	Vertical delineation of Metals in the FRA, PCB/PAH added to 25% FRA locations
STI-B257	Excavation 1-7														X	X	Vertical delineation of Metals in the FRA
STI-B258	Excavation 1-7														X	X	Vertical delineation of Metals in the FRA
STI-B259	Excavation 1-7														X	X	Vertical delineation of Metals in the FRA
STI-B260	Excavation 1-7														X	X	Vertical delineation of Metals in the FRA
STI-B269	Excavation 1-7														X	X	Vertical delineation of Metals in the FRA
STI-B270	Excavation 1-7														X	X	Lateral delineation of Metals in the FRA
STI-B271	Excavation 1-7														X	X	Lateral delineation of Metals in the FRA
STI-B272	Excavation 1-7	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	Lateral delineation of Metals in the FRA, PCB/PAH added to 25% FRA locations

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STI-B280	Excavation 1-7													X	X	X	Lateral delineation of Metals in the FRA
STI-M	Excavation 1-7														X	X	Vertical delineation of Metals at location STI-B123
STI-B253	FRA (on-Site)	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	Lateral delineation of Metals in the FRA, PCB/PAH added to 25% FRA locations
STI-B254	FRA (on-Site)													X	X	X	Lateral delineation of Metals in the FRA
STI-B255	FRA (on-Site)													X	X	X	Lateral delineation of Metals in the FRA
STI-B274	FRA (on-Site)													X	X	X	Lateral delineation of Metals in the FRA
STI-B275	FRA (on-Site)	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	Lateral delineation of Metals in the FRA, PCB/PAH added to 25% FRA locations
STI-B277	FRA (on-Site)													X	X	X	Lateral delineation of Metals in the FRA
STI-B278	FRA (on-Site)													X	X	X	Lateral delineation of Metals in the FRA
STI-B279	FRA (on-Site)													X	X	X	Lateral delineation of Metals in the FRA
STI-B201	MSA											X	X	X			Lateral delineation of SVOCs in the MSA
STI-B205	MSA											X	X	X			Lateral delineation of SVOCs in the MSA
STI-B206	MSA											X	X	X			Delineation of SVOCs in the MSA
STI-B207	MSA											X	X	X			Delineation of SVOCs in the MSA
STI-B208	MSA													X	X	X	Vertical delineation of Metals in the MSA
STI-B209	MSA											X	X	X	X	X	Vertical delineation of Metals and SVOCs in the MSA
STI-B210	MSA										X	X	X				Delineation of PCBs and SVOCs in the MSA
STI-B237	MSA										X	X	X	X	X	X	Vertical delineation of PCBs, Metals and SVOCs in the MSA
STI-B238	MSA											X	X				Vertical delineation of SVOCs in the MSA
STI-B239	MSA										X	X	X	X	X	X	Vertical delineation of PCBs, Metals and SVOCs in the MSA
STI-B240	MSA										X	X	X	X	X	X	Vertical delineation of PCBs, Metals and SVOCs in the MSA
STI-B241	MSA											X	X	X	X	X	Vertical delineation of Metals and SVOCs in the MSA
STI-B242	MSA											X	X	X	X	X	Vertical delineation of Metals and SVOCs in the MSA
STI-B243	MSA											X	X				Lateral delineation of SVOCs in the MSA
STI-B244	MSA											X	X				Lateral delineation of SVOCs in the MSA
STI-B245	MSA											X	X				Lateral delineation of SVOCs in the MSA
STI-B246	MSA											X	X				Lateral delineation of SVOCs in the MSA
STI-B247	MSA											X	X				Lateral delineation of SVOCs in the MSA
STI-B248	MSA											X	X				Lateral delineation of SVOCs in the MSA
STI-B249	MSA											X	X				Lateral delineation of SVOCs in the MSA
STI-B250	MSA											X	X	X	X	X	Vertical delineation of Metals and SVOCs in the MSA
STI-B261	MSA											X	X	X			Lateral delineation of SVOCs in the MSA
STI-B262	MSA											X	X	X			Lateral delineation of SVOCs in the MSA
STI-B263	MSA											X	X	X			Lateral delineation of SVOCs in the MSA
STI-B264	MSA											X	X	X			Lateral delineation of SVOCs in the MSA
STI-B265	MSA										X	X	X	X	X	X	Vertical delineation of PCBs, Metals and SVOCs in the MSA
STI-B266	MSA											X	X				Vertical delineation of SVOCs in the MSA
STI-B267	MSA											X	X				Vertical delineation of SVOCs in the MSA
STI-B268	MSA											X	X	X	X	X	Vertical delineation of Metals and SVOCs in the MSA
STI-B281	MSA											X	X	X			Lateral delineation of SVOCs in the MSA
STI-B282	MSA											X	X	X			Lateral delineation of SVOCs in the MSA
STI-B251	Outside of FRA	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	Lateral delineation of Metals in the FRA, PCB/PAH added to 25% FRA locations
STI-B252	Outside of FRA													X	X	X	Lateral delineation of Metals in the FRA
STI-B273	Outside of FRA													X	X	X	Lateral delineation of Metals in the FRA
STI-B276	Outside of FRA	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	Lateral delineation of Metals in the FRA, PCB/PAH added to 25% FRA locations
STI-B211	S. of Building 88											X	X	X			Lateral delineation of SVOCs in unfenced area S. of Building 88
STI-B212	S. of Building 88											X	X	X			Lateral delineation of SVOCs in unfenced area S. of Building 88
STI-B213	S. of Building 88													X	X		Delineation of Metals in the unfenced area S. of Building 88
STI-B214	S. of Building 88													X	X		Delineation of Metals in the unfenced area S. of Building 88
STI-B215	S. of Building 88	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	Delineation of Metals in the unfenced area S. of Building 88
STI-B216	S. of Building 88	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	Delineation of Metals in the unfenced area S. of Building 88
STI-B217	S. of Building 88											X	X	X	X		Lateral delineation of SVOCs in unfenced area S. of Building 88
STI-B218	S. of Building 88	X	X	X	X	X	X	X	X	X	X	X	X	X	X		Lateral delineation of SVOCs in unfenced area S. of Building 88
STI-B219	S. of Building 88	X	X	X	X	X	X	X	X	X	X	X	X	X	X		Lateral delineation of SVOCs in unfenced area S. of Building 88
STI-B220	S. of Building 88	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	Delineation of Metals in the unfenced area S. of Building 88

Notes:

- X - Sample and Analyze
- H - Sample and Hold
- ft bgs - feet below ground surface
- PCB - Polychlorinated Biphenyls
- SVOC - Semi-volatile Organic Compound (includes PAHs)
- PAHs - polycyclic aromatic hydrocarbons

X Added Sampled and/or Analysis

NOTE: Additional Full suite sample locations to be selected; Full suite analyses will be completed at 25 % of all samples. Full suite includes PCBs, Metals, SVOCs, VOCs and ECs.