



November 11, 2019

**Mr. David Pratt**

New York State Department of Environmental Conservation  
Region 8  
6274 E. Avon-Lima Road  
Avon, New York 14414

Re: Site Management Periodic Review Report  
And IC/EC Certification Submittal (2019)  
Elderlee Site (NO. 835014)  
Oaks Corners, New York 14518

**Dear Mr. Pratt:**

On behalf of Elderlee, Inc. (Elderlee), NEU-VELLE, LLC. (NEU-VELLE) is pleased to submit the enclosed Periodic Review Report (PRR) and completed certification form which documents the implementation and compliance with the Site Management Plan (SMP) for the Elderlee Site No. 835014, located in Oaks Corners, New York.

This report has been prepared in response to the letter from the Department to Elderlee dated October 4<sup>th</sup>, 2019. This submission completes the requirements for the PRR and the certification for the Elderlee site by the Department.

Please feel free to contact me at any time at (585) 313-4771 with any questions you may have regarding this letter report, or contact Mr. Robert Lamb, Elderlee EHS Manager for the project at (315) 374-6188.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. A. Moore'.

James A. Moore, ASHM  
NEU-VELLE, LLC

cc: Robert Lamb – Elderlee, Inc.



# Site Management Periodic Review Report and IC/EC Certification (2019)

Elderlee, Inc. (835014)  
Oaks Corners, New York

**Submitted to:**  
New York State Department of Environmental Conservation  
Division of Environmental Remediation, Region 8  
Avon, New York

**Submitted by:**  
NEU-VELLE, LLC  
Eastman Business Park  
1667 Lake Avenue  
Building 59, Suite 101  
Rochester, New York 14652

**On behalf of:**  
Elderlee, Inc.  
729 Cross Road  
Oaks Corners, New York

November 2019

Eastman Business Park, 1667 Lake Avenue, Building 59, 1<sup>st</sup> Floor, Rochester, New York 14615

[WWW.NEU-VELLE.COM](http://WWW.NEU-VELLE.COM)

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## 1. Executive Summary

NEU-VELLE, LLC (NEU-VELLE) conducted the Site Management Periodic Review Report (PRR) and IC/EC Certification submittal for the Elderlee, Inc. Site located in Oaks Corners, New York (Figure 1). The remediation of Area A Site was conducted jointly by Elderlee and the New York State Department of Environmental Conservation (NYSDEC).

NEU-VELLE found that each component of the SMP was complied with during this reporting period:

- ICs/ECs have been in place and effective and
- Inspections were performed as required.

Based upon or inspection, the Site remedy continues to meet the remedial objectives. There were no visual observations of cap damage observed during our inspection. Elderlee will continue to conduct inspections on an annual frequency.

## **2. Site Overview**

### **2.1 Site Description**

A portion of this Site (Elderlee, Inc.) in Oaks Corners, New York is a listed New York State Department of Environmental Conservation (NYSDEC) Inactive Hazardous Waste Disposal Site (NYSDEC ID# 835014). This Site has been utilized to manufacture road signs, galvanized highway bridge rail, and guide rails since approximately 1968. Hazardous waste was disposed of in distinct Area A of the Site.

Area A is a location of two (2) former settling lagoons that were located north of the galvanizing plant and used for neutralizing waste sulfuric acid until approximately 1984. Elevated levels of zinc and lead were detected in soil samples collect from the former lagoon area. A Remedial Investigation/Feasibility Study (RI/FS) was conducted at the Site in the fall of 1995. The RI/FS was finalized in 1998 and a Record of Decision (ROD) was signed in March 1998. The ROD specified asphalt capping of the former lagoon area combined with continued semi-annual ground water monitoring of selected wells located within, and downgradient, from Area A. The sampling frequency was subsequently reduced to annual sampling.

### **3. Remedy Performance Evaluation**

The remedial performance is evaluated based on the following:

1. Periodic inspection of the Area A cap.

#### **3.1 Area A Cap**

The annual inspection of Area A was performed on October 21, 2019 by representatives of NEU-VELLE. NEU-VELLE conducted an inspection for cracks or damage of the asphalt cap within Area A. Elderlee recently sealed any cracking and provided a sealant over the entire Area A.

The inspection consisted of the following:

1. Examine for evidence of asphalt deterioration.

No deterioration of the exposed asphalt cap was observed. No structural defects (*i.e.*, settlement) in the cap were observed.

## **4. IC/EC Plan Compliance**

### **4.1 IC/EC Requirements**

ICs include the following:

- Site Management Plan; and
- Land Use Restriction.

Site use of the property is limited to industrial use which includes operation of Elderlee's facilities.

ECs include the asphalt cap as described in the SMP.

### **4.2 IC/EC Compliance**

The NYSDEC-approved SMP is in place. All required inspections were performed in accordance with the SMP. All Site restrictions have been complied with during this reporting period.

### **4.3 IC/EC Certification**

The IC/EC Certification is included in Appendix A.

## **5. Inspection Plan Compliance**

### **5.1 Inspection Requirements**

The inspection requirements as specified in the SMP.

### **5.2 Inspection Compliance**

The inspections were conducted in accordance with the SMP.

## **6. Conclusions and Recommendations**

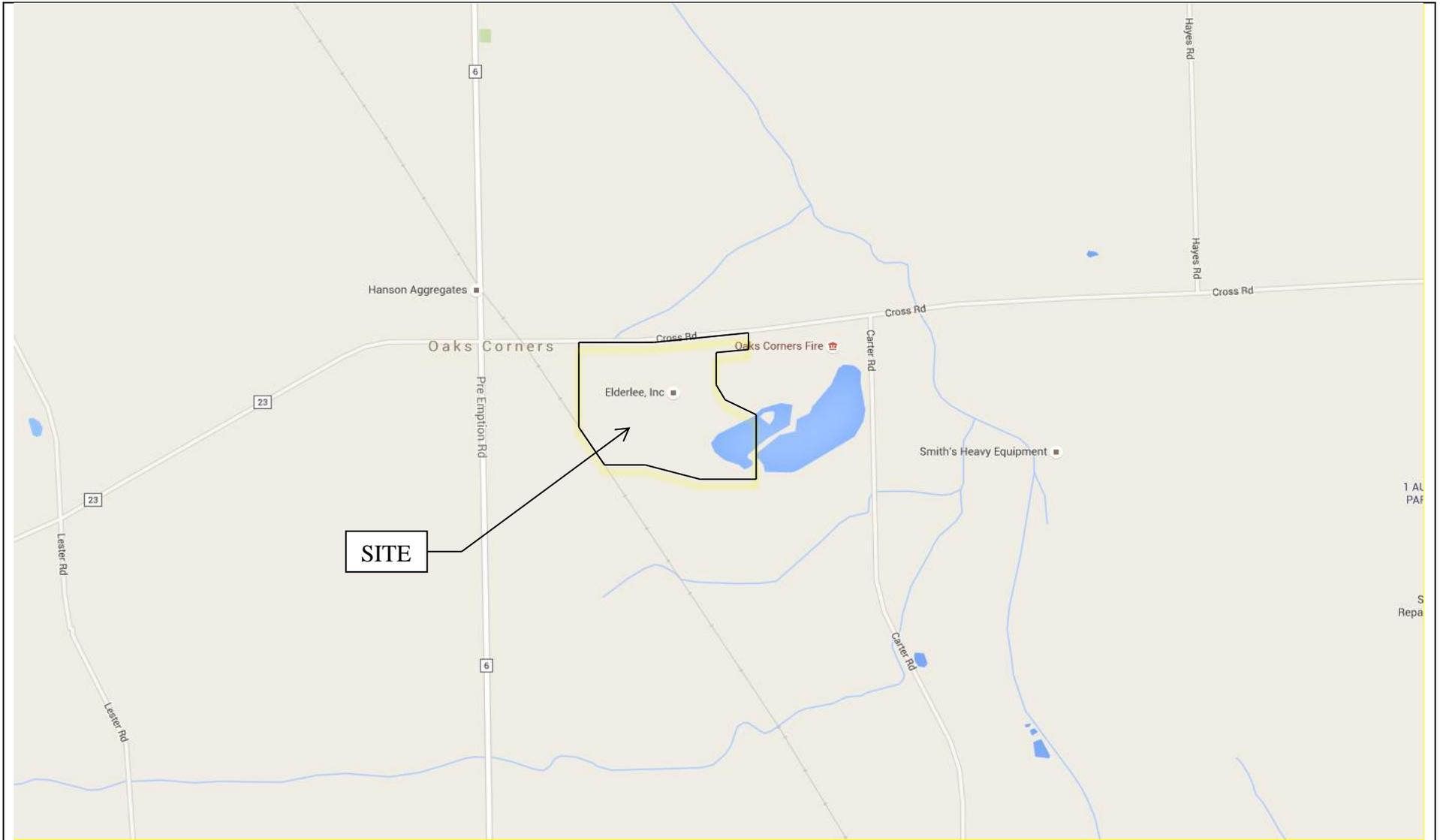
Each component of the SMP was complied with:

- ICs/ECs have been in place and effective, and
- Inspections were performed as required.

Based upon the inspection, the Site remedy continues to meet the remedial objectives. The cap is present over the former lagoons as depicted in the site location map, Figure 1. Elderlee proposes to continue to conduct inspections on an annual basis.

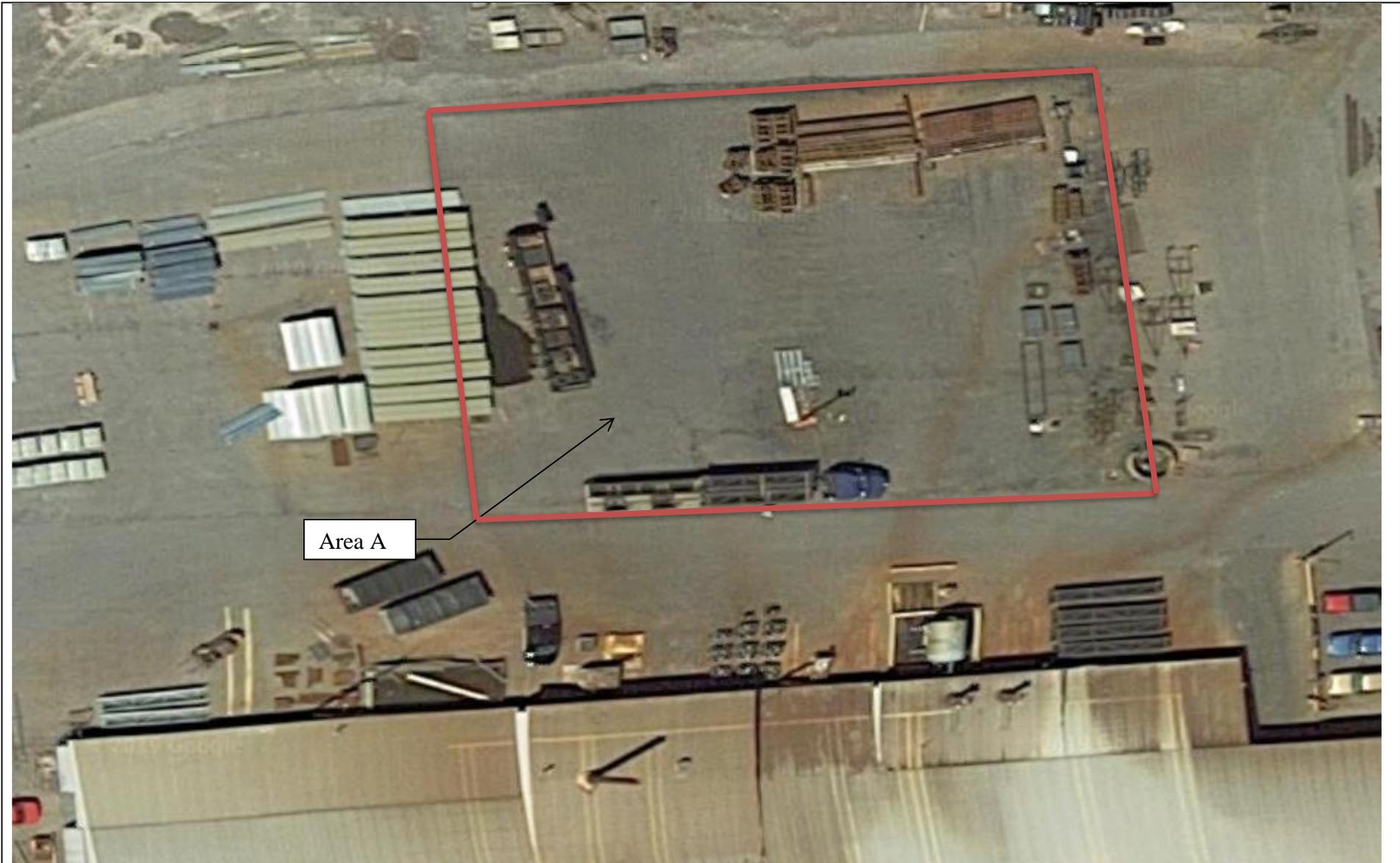
Site Management Periodic Review  
Report and IC/EC Certification (2019)  
Elderlee, Inc. Site (835014)  
Oaks Corners, New York  
November 2019

Figures



1667 Lake Avenue, Building 59, Suite 101, Rochester, New York 14615

<b>Site Location Map</b> Elderlee, Inc. - 729 Cross Road, Oaks Corners, NY	
Drawn Date: November 2019	
Drawn By: J. Moore	
Scale: NTS	Figure No. 1



Area A



1667 Lake Avenue, Building 59, Suite 101, Rochester, New York 14615

Site Location Map

Elderlee, Inc. - 729 Cross Road, Oaks Corners, NY

Drawn Date: November 2019

Drawn By: J. Moore

Scale: NTS

Figure No. 2

Site Management Periodic Review  
Report and IC/EC Certification (2019)  
Elderlee, Inc. Site (835014)  
Oaks Corners, New York  
November 2019

Appendix A

Institutional and Engineering Controls Certification Form



Enclosure 2  
**NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION**  
**Site Management Periodic Review Report Notice**  
**Institutional and Engineering Controls Certification Form**



	Site Details	Box 1
<b>Site No.</b> 835014		
<b>Site Name</b> Elderlee, Inc.		
Site Address: 729 CROSS ROAD	Zip Code: 14518	
City/Town: Oaks Corners		
County: Ontario		
Site Acreage: 2.000		
Reporting Period: November 15, 2018 to November 15, 2019		
		YES    NO
1. Is the information above correct?		<input checked="" type="checkbox"/> <input type="checkbox"/>
If NO, include handwritten above or on a separate sheet.		
2. Has some or all of the site property been sold, subdivided, merged, or undergone a tax map amendment during this Reporting Period?		<input type="checkbox"/> <input checked="" type="checkbox"/>
3. Has there been any change of use at the site during this Reporting Period (see 6NYCRR 375-1.11(d))?		<input type="checkbox"/> <input checked="" type="checkbox"/>
4. Have any federal, state, and/or local permits (e.g., building, discharge) been issued for or at the property during this Reporting Period?		<input type="checkbox"/> <input checked="" type="checkbox"/>
<b>If you answered YES to questions 2 thru 4, include documentation or evidence that documentation has been previously submitted with this certification form.</b>		
5. Is the site currently undergoing development?		<input type="checkbox"/> <input checked="" type="checkbox"/>
		<b>Box 2</b>
		YES    NO
6. Is the current site use consistent with the use(s) listed below? Industrial		<input checked="" type="checkbox"/> <input type="checkbox"/>
7. Are all ICs/ECs in place and functioning as designed?		<input checked="" type="checkbox"/> <input type="checkbox"/>
<b>IF THE ANSWER TO EITHER QUESTION 6 OR 7 IS NO, sign and date below and DO NOT COMPLETE THE REST OF THIS FORM. Otherwise continue.</b>		
A Corrective Measures Work Plan must be submitted along with this form to address these issues.		
 _____ Signature of Owner, Remedial Party or Designated Representative		_____ 11/4/19 Date

SITE NO. 835014

Box 3

**Description of Institutional Controls**

Parcel

Owner

Institutional Control

O&M Plan

Site is fenced with security.

Deed restriction: Cover system maintenance within Area A & B, Industrial or Commercial property use only, Prohibit groundwater use for potable uses without treatment and Department approval, O&M Plan compliance.

Box 4

**Description of Engineering Controls**

Parcel

Engineering Control

Cover System

Fencing/Access Control

Former waste lagoons are capped with asphalt.

**Periodic Review Report (PRR) Certification Statements**

1. I certify by checking "YES" below that:

a) the Periodic Review report and all attachments were prepared under the direction of, and reviewed by, the party making the certification;

b) to the best of my knowledge and belief, the work and conclusions described in this certification are in accordance with the requirements of the site remedial program, and generally accepted engineering practices; and the information presented is accurate and complete.

YES NO

2. If this site has an IC/EC Plan (or equivalent as required in the Decision Document), for each Institutional or Engineering control listed in Boxes 3 and/or 4, I certify by checking "YES" below that all of the following statements are true:

(a) the Institutional Control and/or Engineering Control(s) employed at this site is unchanged since the date that the Control was put in-place, or was last approved by the Department;

(b) nothing has occurred that would impair the ability of such Control, to protect public health and the environment;

(c) access to the site will continue to be provided to the Department, to evaluate the remedy, including access to evaluate the continued maintenance of this Control;

(d) nothing has occurred that would constitute a violation or failure to comply with the Site Management Plan for this Control; and

(e) if a financial assurance mechanism is required by the oversight document for the site, the mechanism remains valid and sufficient for its intended purpose established in the document.

YES NO

**IF THE ANSWER TO QUESTION 2 IS NO, sign and date below and DO NOT COMPLETE THE REST OF THIS FORM. Otherwise continue.**

**A Corrective Measures Work Plan must be submitted along with this form to address these issues.**

Alfred D. Lyons  
Signature of Owner, Remedial Party or Designated Representative

11/4/19  
Date

IC CERTIFICATIONS  
SITE NO. 835014

Box 6

**SITE OWNER OR DESIGNATED REPRESENTATIVE SIGNATURE**

I certify that all information and statements in Boxes 1, 2, and 3 are true. I understand that a false statement made herein is punishable as a Class "A" misdemeanor, pursuant to Section 210.45 of the Penal Law.

NEU-VELLE LLC  
1667 LAKE AVE, Bldg 59, SUITE 101  
Rochester, NY 14615

I Albert G. Lyons, Jr. at \_\_\_\_\_  
print name print business address

am certifying as Designated Representative (Owner or Remedial Party)

for the Site named in the Site Details Section of this form.

Albert G Lyons, Jr  
Signature of Owner, Remedial Party, or Designated Representative  
Rendering Certification

11/4/19

Date

IC/EC CERTIFICATIONS

Box 7

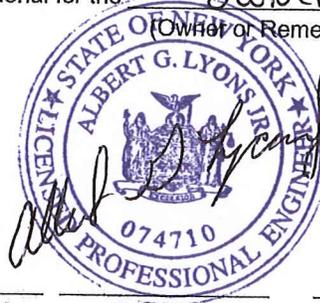
Qualified Environmental Professional Signature

I certify that all information in Boxes 4 and 5 are true. I understand that a false statement made herein is punishable as a Class "A" misdemeanor, pursuant to Section 210.45 of the Penal Law.

I Albert G. Lyons, Jr at Neu-velle, LLC  
1067 LAKE AVE, Bldg 59, suite 101  
Rochester, NY 14615  
print name print business address

I am certifying as a Qualified Environmental Professional for the OWNER  
(Owner or Remedial Party)

Albert G Lyons  
Signature of Qualified Environmental Professional, for  
the Owner or Remedial Party, Rendering Certification



Stamp  
(Required for PE)

11/4/19  
Date

Site Management Periodic Review  
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Appendix B

Photo Log

# Representative Photos

Elderlee, Inc. Site No. – 835014

Date: October 21, 2019

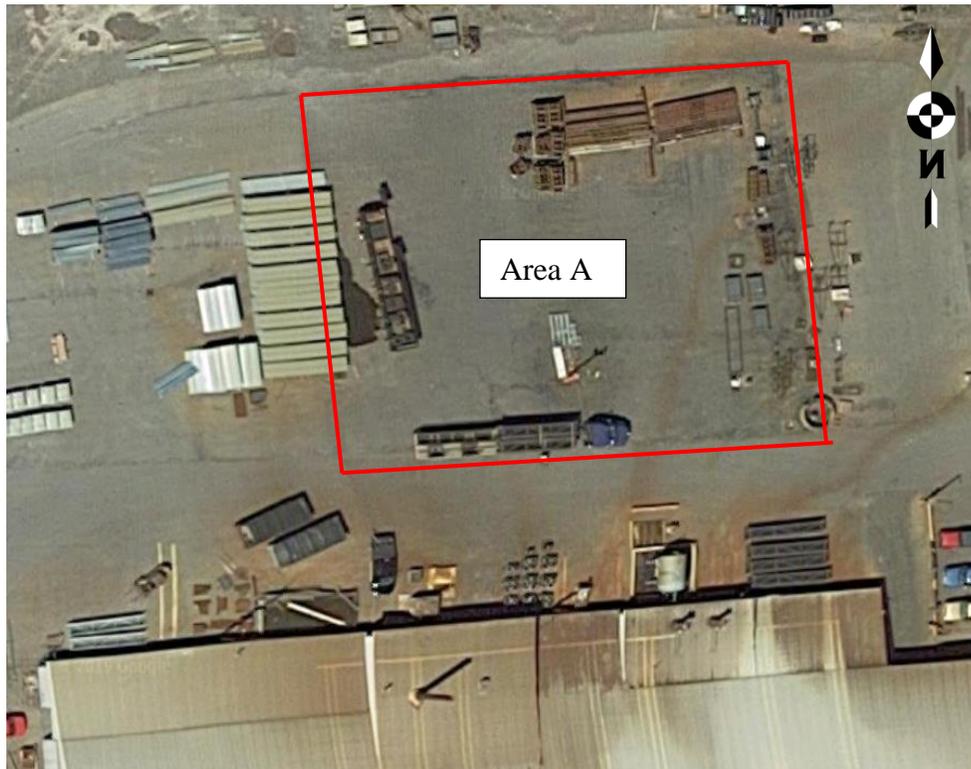


Photo No 1. – Ariel View



Photo No. 2 – Asphalt seal along south edge of Area A – viewing west.

# Representative Photos

Elderlee, Inc. Site No. – 835014

Date: October 21, 2019

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**Photo No. 3 – Asphalt seal along west edge of Area A – viewing north.**



**Photo No. 4 – Asphalt seal along north edge of Area A – viewing east.**

# Representative Photos

Elderlee, Inc. Site No. – 835014

Date: October 21, 2019



**Photo No. 5 – Asphalt seal along east edge of Area A – viewing south.**



**Photo No. 6 – Asphalt seal area view of Area A – viewing northeast.**