**NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION**

**Division of Environmental Remediation, Region 9**
270 Michigan Avenue, Buffalo, NY 14203-2915
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www.dec.ny.gov

May 23, 2018

Mr. Gregory L. Simpson
Senior Project Manager
Textron
40 Westminster Street
Providence, Rhode Island 02903

Dear Mr. Simpson:

Textron, Inc.
EPA ID No. **NYD002106276**
Order on Consent, Index No. 932052-01-04
Operation and Maintenance Inspection Report
Site #932052

The New York State Department of Environmental Conservation (the "Department") conducted an Operation and Maintenance inspection on April 18, 2018 of the groundwater monitoring program at the Textron Inc. facility in Wheatfield, NY. Based upon the Department's inspection of sample collection and review of associated documents, the Department has determined that Textron Inc. is in compliance with the Ground Water Monitoring Plan and the Order on Consent, Index No. 932052-01-04. The inspection report is attached.

If you have any questions regarding this inspection, please contact me at (716)851-7220.

Sincerely,

Digitally signed by SFR
DN: cn=SFR, o, ou, email=stanley.radon@dec.ny.gov, c=US
Date: 2018.05.23 15:58:20 -04'00'

Stanley Radon, P.G.
Regional Remediation Geologist

Attachments

ec. Cecelia Byers (cecelia.byers@aptim.com)
Kevin Cronin (kevi.cronin@shawgrp.com)

**OPERATION AND MAINTENANCE INSPECTION**
**TEXTRON Inc.**
**WHEATFIELD, NEW YORK**

## Introduction:

On April 18, 2018 Stanley Radon, P.G., conducted an Operation and Maintenance Inspection at the Textron Inc., Facility, EPA I.D. No. NYD002106276. The evaluation included review of documents related to the operating record and sampling plan and observation of groundwater sample collection.

## Background:

The Order on Consent, Index No. 932052-01-04, requires Textron Inc. to operate a corrective action program in accordance with the Groundwater Monitoring Plan (GMP) and Site Management Plan (SMP). The groundwater corrective action system is comprised of two components.

1. Off-site System: The system consists of three (3) extraction wells which are piped to the Niagara County Sewer District No. 1 POTW. The goal of the off-site groundwater pumping system is to reduce the size of the dissolved phase plume boundary.

2. On-Site System: The main system consists of three (3) recovery wells designed to hydraulically contain the DNAPL plume and contain aqueous-phase contamination, and two (2) extraction wells to control off-site migration of aqueous-phase contamination. The groundwater extracted from the on-site extraction system is piped to the on-site groundwater treatment plant. Currently, the on-site system is in the middle of a year-long bioremediation pilot study to determine the effectiveness of the same. The on-site pumping wells have temporarily been shut off during this period. The Department will make a determination if the extraction system will be resumed at the end of the bioremediation study.

## Sampling:

On April 18, 2018, Stanley Radon of the New York State Department of Environmental Conservation observed staff from APTIM Environmental, Inc. and ALS Environmental, sample several groundwater wells. Specifically, sampling of wells EW-3 and EW-4 were observed to

determine compliance with the GMP. All of the aforementioned wells are part of the off-site ground water extraction system and monitoring program.

All the wells were under a manhole cover and in good condition. Groundwater level measurements were made using an electronic water level indicator graduated to 0.01 ft. The water level indicator was decontaminated by triple rinsing with de-ionized water prior to measuring the elevations in each well. Well volumes were then calculated to determine purge volumes and each well was purged three well volumes prior to obtaining the groundwater sample.

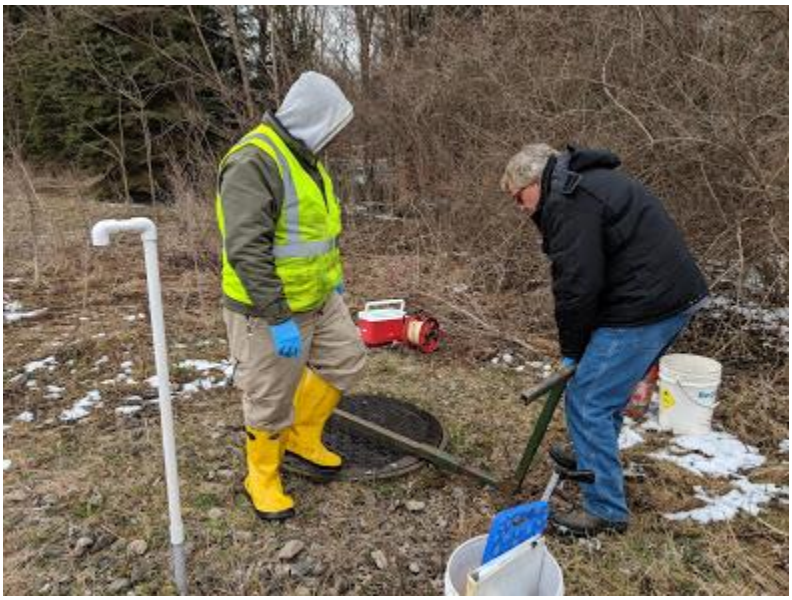
Samples were collected for Volatile Organic Compounds (VOCs) and all 40 ml containers were checked for air bubbles. All sample equipment is dedicated to each monitoring well. Sample containers were stored in a cooler containing ice.

Pictures showing the various stages of sampling are in Attachment A. Attachment B includes the field sampling data sheets and the chain of custody forms for all samples collected during the inspection.

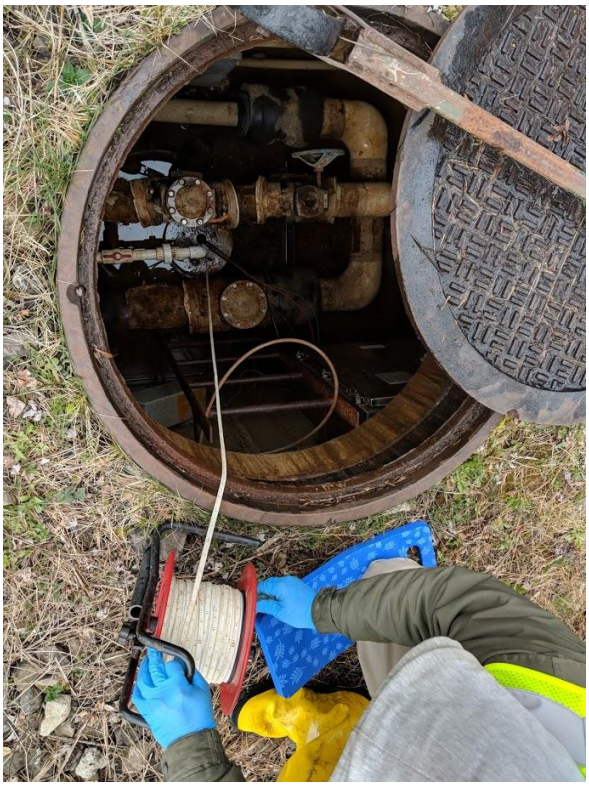
**Summary:**

Based upon review of the Groundwater Monitoring Plan, oversight of groundwater sample collection, and review of company records, the Department has determined that Textron is in compliance with the GMP and Order on Consent. The Department will analyze the results of the sample data in the Annual Monitoring Report to determine the efficiency of the extraction systems in reducing the extent of the contaminant plume.

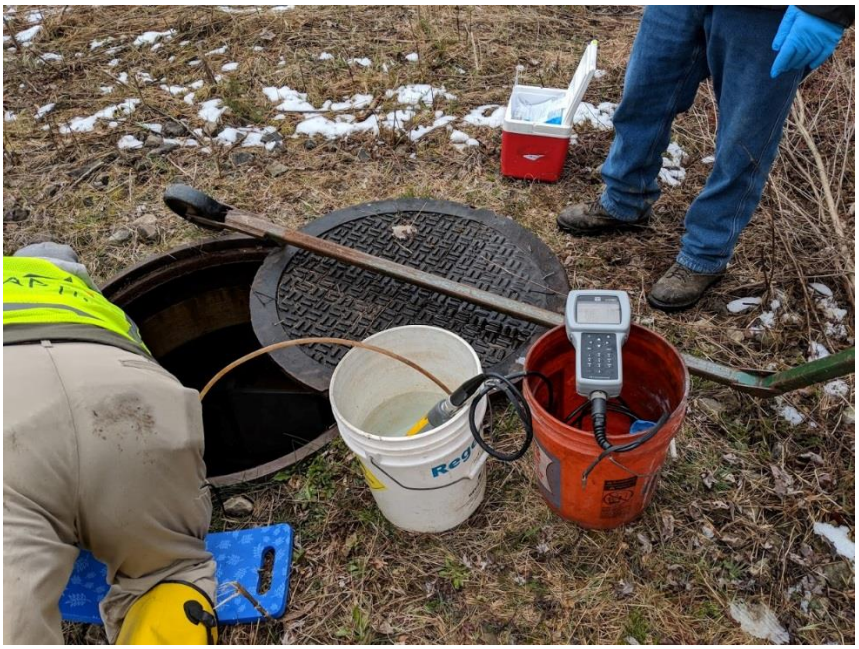
# ATTACHMENT A



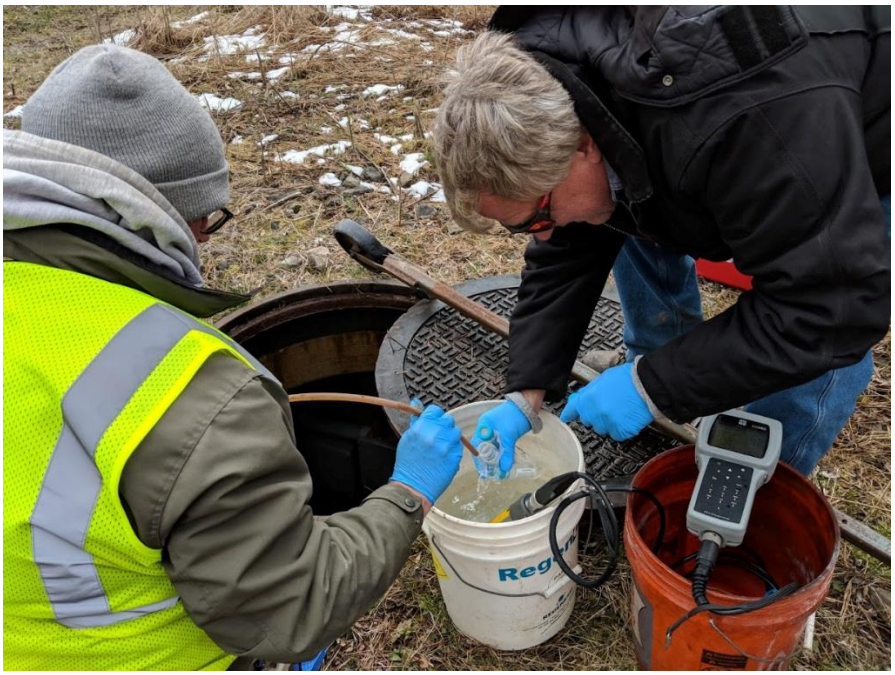
Removing manhole cover from EW-4



Checking groundwater elevations



Checking field parameters for purge from monitoring well EW-4



Collecting VOA samples in 40m ml. container

**ATTACHMENT B**

# CHAIN OF CUSTODY/LABORATORY ANALYSIS REQUEST FORM

49900

1565 Jefferson Road, Building 300, Suite 360 • Rochester, NY 14623 | +1 585 288 5380 +1 585 288 8475 (fax) PAGE 1 OF 1

| | |
|---|---|
| Project Name: TEXTRON WHEATFIELD, NY | Project Number: 63/236330 |
| Project Manager: CECILIA BYERS | Report CC: |
| Company/Address: APTIM, INC. 13 BRITISH AMERICAN BLVD. LATHAM, NY 12210 | |
| Phone #: 518-785-1996 | Email: CECILIA.BYERS@APTIM.COM |
| Sampler's Signature: | Sampler's Printed Name: KEVIN CRONIN |

**ANALYSIS REQUESTED** *(Include Method Number and Container Preservative)*

PRESERVATIVE: 1

| CLIENT SAMPLE ID | FOR OFFICE USE ONLY LAB ID | SAMPLING DATE | SAMPLING TIME | MATRIX | NUMBER OF CONTAINERS | GC/MS VOAs ◦ 8260 ◦ 624 ◦ CLP | GC/MS SVOAs ◦ 8270 ◦ 625 | GC VOAs ◦ 8021 ◦ 601/602 | PESTICIDES ◦ 8081 ◦ 608 | PCBs ◦ 8082 ◦ 608 | METALS, TOTAL (List in comments below) | METALS, DISSOLVED (List in comments below) | REMARKS/ ALTERNATE DESCRIPTION |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| BAT-EW-2-180418 | | 4/18/18 | 1015 | GW | 3 | X | | | | | | | |
| BAT-EW-2-180418 MS | | | ↓ | | 3 | X | | | | | | | |
| BAT-EW-2-180418 MSD | | | ↓ | | 3 | X | | | | | | | |
| BAT-EW-3-180418 | | | 1035 | | 3 | X | | | | | | | |
| BAT-EW-4-180418 | | | 1100 | | 3 | X | | | | | | | |
| BAT-EW-5-180418 | | | 1700 | | 3 | X | | | | | | | |
| BAT-EW-6-180418 | | | 1215 | | 3 | X | | | | | | | |
| BAT-93-03(1)-180418 | | | 1245 | | 3 | X | | | | | | | |
| | | | | | | | | | | | | | |
| | | | | | | | | | | | | | |
| BAT-DUP01-180418 | | 4/18/18 | — | | 3 | X | | | | | | | |

Preservative Key
0. NONE
1. HCL
2. $HNO_3$
3. $H_2SO_4$
4. NaOH
5. Zn. Acetate
6. MeOH
7. $NaHSO_4$
8. Other _____

SPECIAL INSTRUCTIONS/COMMENTS
**Metals**
DUP-01 IS EW-4

See QAPP ☐

STATE WHERE SAMPLES WERE COLLECTED

**TURNAROUND REQUIREMENTS**
_____ RUSH (SURCHARGES APPLY)
_____ 1 day _____ 2 day _____ 3 day
_____ 4 day _____ 5 day
STANDARD
REQUESTED REPORT DATE
_____

**REPORT REQUIREMENTS**
_____ I. Results Only
_____ II. Results + QC Summaries (LCS, DUP, MS/MSD as required)
_____ III. Results + QC and Calibration Summaries
_____ IV. Data Validation Report with Raw Data
Edata _____ Yes _____ No

**INVOICE INFORMATION**
PO #
BILL TO:

| RELINQUISHED BY | RECEIVED BY | RELINQUISHED BY | RECEIVED BY | RELINQUISHED BY | RECEIVED BY |
|---|---|---|---|---|---|
| Signature | Signature | Signature | Signature | Signature | Signature |
| Printed Name: KEVIN CRONIN | Printed Name: BOB (UPS) | Printed Name | Printed Name | Printed Name | Printed Name |
| Firm: APTIM | Firm: ALS | Firm | Firm | Firm | Firm |
| Date/Time: 4/18/18 1550 | Date/Time: 4/19/18 1530 | Date/Time | Date/Time | Date/Time | Date/Time |

Distribution: White - Lab Copy; Yellow - Return to Originator

# TEXTRON, INC.
# FIELD SAMPLING DATA SHEET
# WELL PURGE – WATER QUALITY MEASUREMENTS

Site Name: Former Textron Wheatfield Facility
Project Number: 631236330
Well Number: EW- 2
Date: 04/ 18 /2018
Field Personnel: K. Cronin, Bob Urban (ALS tech.)
Physical Condition of Well: Good
Well Diameter: 8"
Air Monitoring Results: 0,0 ppmv
Depth to Water: ~ 5.36
Depth to Bottom:
Purge Volume:
Volume Removed: ~3 GALS

*Volume Factors: (circle one)
1.25-inch well = 0.064 gal/ft
2-inch well = 0.163 gal/ft
4-inch well = 0.653 gal/ft

Purge Method: circle one

Stainless Steel Bailer | (Dedicated Poly Tubing from Sampling Port) | Whale Pump with ET Tubing | Polyethylene Bailer | Grundfos Submersible Pump

Purge Water Disposal: Drummed for Offsite Treatment

| PARAMETERS Units | pH s.u. | Spec. Cond. ms/cm | Temp. °C | Sample Description |
|---|---|---|---|---|
| Initial Purge | 7.55 | 1.319 | 10.92 | clear |
| Final Purge | 7.29 | 1.559 | 10.70 | clear |

Sampling Method: circle one

Stainless Steel Bailer | (Dedicated Poly Tubing from Sampling Port) | Whale Pump with ET Tubing | Polyethylene Bailer | Grundfos Submerisble Pump

Sample Number: BAT- EW- 2 -180418
Sample Collection Date/Time: 04/ 18 /2018 1015
Analysis Requested: EPA Method 8260

Notes: MS/MSD COLLECTED HERE
VAULT FLOODED, LEFT WELL IN MANUAL AS PER CB 1025

Sampler Signature: Kyle Cronin

# TEXTRON, INC.
# FIELD SAMPLING DATA SHEET
# WELL PURGE – WATER QUALITY MEASUREMENTS

Site Name: Former Textron Wheatfield Facility
Project Number: 631236330
Well Number: EW- 3
Date: 04/ 18 /2018
Field Personnel: K. Cronin, Bob Urban (ALS tech.)
Physical Condition of Well: Good
Well Diameter: 8"
Air Monitoring Results: 0,0 ppmv
Depth to Water: ~ 5.14'
Depth to Bottom:
Purge Volume:
Volume Removed: ~3 GALS

*Volume Factors: (circle one)
1.25-inch well = 0.064 gal/ft
2-inch well = 0.163 gal/ft
4-inch well = 0.653 gal/ft

Purge Method: circle one

Stainless Steel Bailer | (Dedicated Poly Tubing from Sampling Port) | Whale Pump with ET Tubing | Polyethylene Bailer | Grundfos Submersible Pump

Purge Water Disposal: Drummed for Offsite Treatment

| PARAMETERS Units | pH s.u. | Spec. Cond. ms/cm | Temp. °C | Sample Description |
|---|---|---|---|---|
| Initial Purge | 7.31 | 2.017 | 10.02 | clear |
| Final Purge | 7.23 | 1.602 | 9.75 | clear |

Sampling Method: circle one

Stainless Steel Bailer | (Dedicated Poly Tubing from Sampling Port) | Whale Pump with ET Tubing | Polyethylene Bailer | Grundfos Submerisble Pump

Sample Number: BAT-EW-3 -180418
Sample Collection Date/Time: 04/ 18 /2018 1035
Analysis Requested: EPA Method 8260

Notes: VAULT FLOODED

Sampler Signature: Kevin Cronin

# TEXTRON, INC.
# FIELD SAMPLING DATA SHEET
# WELL PURGE – WATER QUALITY MEASUREMENTS

Site Name: Former Textron Wheatfield Facility
Project Number: 631236330
Well Number: EW- 4
Date: 04/ 18 /2018
Field Personnel: K. Cronin, Bob Urban (ALS tech.)
Physical Condition of Well: Good
Well Diameter: 8"
Air Monitoring Results: 0.0 ppmv
Depth to Water: ~ 26.99'
Depth to Bottom:
Purge Volume:
Volume Removed: ~ 3.5

*Volume Factors: (circle one)
1.25-inch well = 0.064 gal/ft
2-inch well = 0.163 gal/ft
4-inch well = 0.653 gal/ft

Purge Method: circle one

Stainless Steel Bailer | Dedicated Poly Tubing from Sampling Port | Whale Pump with ET Tubing | Polyethylene Bailer | Grundfos Submersible Pump

Purge Water Disposal: Drummed for Offsite Treatment

| PARAMETERS Units | pH s.u. | Spec. Cond. ms/cm | Temp. °C | Sample Description |
|---|---|---|---|---|
| Initial Purge | 7.40 | 1.870 | 11.12 | clear |
| Final Purge | 7.16 | 1.161 | 10.42 | clear |

Sampling Method: circle one

Stainless Steel Bailer | Dedicated Poly Tubing from Sampling Port | Whale Pump with ET Tubing | Polyethylene Bailer | Grundfos Submerisble Pump

Sample Number: BAT- EW- 4 -180418
Sample Collection Date/Time: 04/ 18 /2018 1100
Analysis Requested: EPA Method 8260

Notes: BAT - DUP 01 - 180418 COLLECTED HERE

Sampler Signature: Kyan Cro

# TEXTRON, INC.
# FIELD SAMPLING DATA SHEET
# WELL PURGE – WATER QUALITY MEASUREMENTS

Site Name: Former Textron Wheatfield Facility
Project Number: 631236330
Well Number: EW- 5
Date: 04/ 18 /2018
Field Personnel: K. Cronin, Bob Urban (ALS tech.)
Physical Condition of Well: Good
Well Diameter: 8"
Air Monitoring Results: 0.0 ppmv
Depth to Water: ~4.87
Depth to Bottom:
Purge Volume:
Volume Removed: ~3 GALS

*Volume Factors: (circle one)
1.25-inch well = 0.064 gal/ft
2-inch well = 0.163 gal/ft
4-inch well = 0.653 gal/ft

Purge Method: circle one

Stainless Steel Bailer | (Dedicated Poly Tubing from Sampling Port) | Whale Pump with ET Tubing | Polyethylene Bailer | Grundfos Submersible Pump

Purge Water Disposal: Drummed for Offsite Treatment

| PARAMETERS Units | pH s.u. | Spec. Cond. ms/cm | Temp. °C | Sample Description |
|---|---|---|---|---|
| Initial Purge | 7.57 | 1.672 | 9.79 | clear |
| Final Purge | 7.44 | 1.221 | 8.41 | clear |

Sampling Method: circle one

Stainless Steel Bailer | (Dedicated Poly Tubing from Sampling Port) | Whale Pump with ET Tubing | Polyethylene Bailer | Grundfos Submerisble Pump

Sample Number: BAT- EW-5 -180418
Sample Collection Date/Time: 04/ 18 /2018 1200
Analysis Requested: EPA Method 8260

Notes: VAULT FLOODED, PUT WELL IN HAND FOR SAMPLING.

Sampler Signature: Kevin Cronin

# TEXTRON, INC.
# FIELD SAMPLING DATA SHEET
# WELL PURGE – WATER QUALITY MEASUREMENTS

Site Name: Former Textron Wheatfield Facility
Project Number: 631236330
Well Number: EW-6
Date: 04/ 18 /2018
Field Personnel: K. Cronin, Bob Urban (ALS tech.)
Physical Condition of Well: Good
Well Diameter: 8"
Air Monitoring Results: 0.0 ppmv
Depth to Water: ~ 5.31'
Depth to Bottom: NM
Purge Volume:
Volume Removed: ~ 2

*Volume Factors: (circle one)
1.25-inch well = 0.064 gal/ft
2-inch well = 0.163 gal/ft
4-inch well = 0.653 gal/ft

Purge Method: circle one

Stainless Steel Bailer | Dedicated Poly Tubing from Sampling Port | Whale Pump with ET Tubing | (DEDICATED) Polyethylene Bailer | Grundfos Submersible Pump

Purge Water Disposal: Drummed for Offsite Treatment

| PARAMETERS Units | pH s.u. | Spec. Cond. ms/cm | Temp. °C | Sample Description |
|---|---|---|---|---|
| Initial Purge | 7.54 | 2.013 | 9.06 | clear |
| Final Purge | 7.70 | 1.047 | 8.63 | clear |

Sampling Method: circle one

Stainless Steel Bailer | Dedicated Poly Tubing from Sampling Port | Whale Pump with ET Tubing | (DEDICATED) Polyethylene Bailer | Grundfos Submerisble Pump

Sample Number: BAT- EW-6 -180418
Sample Collection Date/Time: 04/ 18 /2018 1215
Analysis Requested: EPA Method 8260

Notes:

Sampler Signature: Kyle Cro

# TEXTRON, INC.
# FIELD SAMPLING DATA SHEET
# WELL PURGE – WATER QUALITY MEASUREMENTS

Site Name: Textron, Wheatfield, NY
Project Number: 631236330
Well Number: MW- 93-03(1)
Date: 04/ 18 /2018
Field Personnel: K. Cronin, R. Urban (ALS)
Physical Condition of Well: Good
Well Diameter: 2"
Air Monitoring Results: 0.0 ppmv
Depth to Product: —
Depth to Water: ~6.41
Depth to Bottom: ~46.43
Purge Volume: 6.6 GAL
Volume Removed: ~ GAL

*Volume Factors: (circle one)

1.25-inch well = 0.064 gal/ft
2-inch well = 0.163 gal/ft
4-inch well = 0.653 gal/ft

Purge Method: circle one

Stainless Steel Bailer | Dedicated Poly Tubing from Sampling Port | Whale Pump with ET Tubing | DEDICATED Polyethylene Bailer | Grundfos Submerisble Pump

Purge Water Disposal: In Plant for Treatment

| PARAMETERS Units | pH s.u. | Spec. Cond. ms/cm | Temp. °C | Sample Description |
|---|---|---|---|---|
| Initial Purge | 7.44 | 1.774 | 8.55 | clear |
| Final Purge | 7.18 | 1.849 | 10.05 | clear |

Sampling Method: circle one

Stainless Steel Bailer | Dedicated Poly Tubing from Sampling Port | Whale Pump with ET Tubing | DEDICATED Polyethylene Bailer | Grundfos Submerisble Pump

Sample Number: BAT- 93-03(1)-180418
Sample Collection Date/Time: 04/ 18 /2018 1745
Analysis Requested: EPA Method 8260

Notes:

Sampler Signature: Ken Cron

**Textron, Wheatfield**
**Hydraulic Monitoring Event**
**DATE:** 04/18/2018

| Well ID | Depth to Water | Comments |
|---|---|---|
| 87-01(0) | ~ 11.59' | To the left of the overhead doors of Felton Machine |
| 87-01(1) | ~ 12.95' | To the left of the overhead doors of Felton Machine |
| 87-02(1) | ~ 11.05' | Inside the Felton gate |
| 87-02(3) | ~ 10.43' | Inside the Felton gate |
| 87-04(0) | ~ 6.30 | Inside ARC next to DW10, adjacent to Walmore Avenue |
| 87-04(1) | ~ 9.42 | Inside ARC next to DW10, adjacent to Walmore Avenue PRODUCT BENTONITE CEMENT ANNULUS SS. RISER |
| 87-04(3) | ~ 10.09 | Inside ARC next to DW10, adjacent to Walmore Avenue |
| 87-05(1) | ~ 9.44' | Across entrance to ARC, next to DW-11 |
| 87-05(3) | ~ 9.41' | Across entrance to ARC, next to DW-11 |
| 87-08(1) | ~ 9.17 | North area of ARC, east of DW-9 |
| 87-10(0) | ~ 8.35' | North of DW-12, in Textron parking lot, north of WWTP along Walmore |
| 87-10(1) | ~ 11.81' | North of DW-12, in Textron parking lot, north of WWTP along Walmore |
| 87-12(1) | ~ 11.79 | Corner of Niagara Falls Blvd. Next to EW-8 |
| 87-13(0) | ~~9.70~~ 5.61 | West of DW-10 on ARC property |
| 87-13(1) | ~ 10.25 | West of DW-10 on ARC property |
| 87-13(3) | ~ 9.77 | West of DW-10 on ARC property |
| 87-14(0) | ~ 5.14 | On ARC property north of 87-13 |
| 87-14(1) | ~ 9.16 | On ARC property north of 87-13 |
| 87-14(3) | ~ 9.53 | On ARC property north of 87-13 |
| 87-15(0) | ~ ~~5.61~~ 9.70 | On ARC property west of DW-9 |
| 87-15(1) | ~ ~~10.25~~ 9.13 | On ARC property west of DW-9 WHITE FOAMY PRODUCT |
| 87-15(3) | ~ ~~9.79~~ 8.88 | On ARC property west of DW-9 " " " |
| 87-16(3B) | ~ 9.92 | On ARC property in triangular area SW of capped pond |
| 87-17(0) | ~ 9.79 | ARC property southwest of DW-9 |
| 87-17(1) | ~ 8.93 | ARC property southwest of DW-9 |
| 87-18(0) | ~ 11.30' | Next to EW-7 on NFB |
| 87-18(1) | ~ 14.15' | Next to EW-7 on NFB |

87-09(1) ~ 8.12'

**Textron, Wheatfield**
**Hydraulic Monitoring Event**
**DATE:** 04/18 /2018

| Well ID | Depth to Water | Pic # | Comments |
|---|---|---|---|
| 87-19(1) | ~ 11.53' | | Old Textron Parking Lot along Cayuga Drive, closer to intersection of Walmore |
| 87-20(0) | ~ 3.65 | | Behind the bar on the corner of NFB and Walmore |
| 87-20(1) | ~ 6.94 | | Behind the bar on the corner of NFB and Walmore |
| 87-21(1) | ~ 5.83 | | On Cuyga Drive near the power lines |
| 87-22(1) | ~ 12.23 | | Off Niagara Road |
| 89-04(1) | ~ 2.35 | | Farm Property over Bridge off Niagara Road on right |
| 89-12(1) | ~ 11.30' | | Next to DW-12 north of WWTP |
| 89-14(0) | ~ 5.38 | | East side of Walmore Ave, north of ARC - NEED GPS COORDINATES |
| 89-14(1) | ~ 9.20 | | East side of Walmore Ave, north of ARC |
| 89-15(1) | ~ 9.91 | | On ARC property, south of DW-10 |
| 93-03(1) | ~ 6.41' | | South of EW-6, string hanging from power lines |
| 96-01(1) | ~ 12.40' | | Next to EW-13 |
| B-8(0) | ~ 6.19 | | Rear of ARC property, wrong cap |
| B-14(1) | ~ 10.51' | | Near Felton building, south of ARC entrance |
| EW-2 | ~ 5.38' | (4) | VAULT FLOODED, ONLY ~ 1" FROM BOTTOM OF BOX ELECTRICAL |
| EW-3 | ~ 5.14 | (5) | " " |
| EW-4 | ~ 26.99' | | NOT FLOODED :) |
| EW-5 | ~ 4.87' | (6) | VAULT FLOODED, SWITCH PUMP TO HAND |
| EW-6 | ~ 5.31' | | " " |
| EW-7 | ~ 8.71' | (3) | WATER FLOWING DOWN INTO WELL FROM VAULT |
| EW-8 | ~ 4.86 | | |
| DW-9 | ~ 0.61 | (7) | FLOODED |
| DW-10 | ~ 4.12 | | |
| DW-11 | ~ 2.45' | (1) | VAULT FLOODED, WATER ENTERING IN @ SIDE |
| DW-12 | ~ 0.47' | (2) | " " |
| EW-13 | ~ 10.59' | | |

Extraction Wells water level elevation measured from top of vault grate.