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 I F: (585) 226-8139
www.dec.ny.gov

Via E-mail

March 26, 2021

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

Re: Amendment #2 Interim Remedial Measure #5 Work Plan
Former Sperry Remington – North Portion Site #c808022
Elmira, Chemung County

Dear Mr. Krueger:

The New York State Department of Environmental Conservation (NYSDEC), in consultation with New York State Department of Health, has completed its review of the Unisys submission entitled "Amendment #2 Interim Remedial Measure #5 Work Plan", dated March 12, 2021 for the Former Sperry Remington – North Portion Site #808022 and provides the following comments:

1. Construction Sequencing, Materials Management, Construction Support and Site Access
    a. The Agency would like to discuss feasibility of alternatives to the proposed Phase 2 portion of the work plan.

2. North Athletic Field: IRM scope and data deficiencies:

- TPH results exceeding screening or the nuisance screening criteria for diesel range organics are not discussed.
- Emerging Contaminant results are not summarized.
- Soil Boring and monitoring well Installation Logs are not included.

Figures and Table Comments

- The Figure scale must be reduced. There are several areas on the figures where the sample locations are overcrowded resulting in illegible or truncated sample IDs.
- Inconsistent data result presentation for figures; some show red as "Exceeds Screening Criteria" and some show red as "Exceeds Action Level".

- The "Sitewide RI Sample" dot sizes presented on the result figures do not match the sizes shown in the legend, making it difficult to discern the sample data results (i.e., SVOCs, Metals or PCBs) being presented on the figures.
- Figures 1A and 1B do not contain "Exceeds Action Level" for Soil Exceedance sample result illustrations.
- Change "IRM #6 Excavation Area" to "IRM#5 Excavation Area" within the Legend of the Figures 1A - 1L.
- Figure 1C and Figures 1G - 1L require a legend definition for "Soil Exceedances" illustrated as magenta for PCB results.
- Result figures have not been provided for Soil samples collected at depths greater than 16 ft bgs.

<u>Additional Excavation and/or Delineation Required</u>

The following proposed IRM excavation areas do not extend to clean PDI points. Additional vertical and/or areal PDI sampling is required to delineate CPOC impacts and determine IRM excavation limits.

Further CPOC PDI Sampling and IRM Excavation Delineation:

- B3648 and NE-Sidewall at 0-0.17-2 ft bgs (PCBs at 1.1 mg/kg and 6.3 mg/kg, respectively); vertically delineated; requires additional PCB PDI sampling and areal IRM Excavation delineation (0-2 ft bgs) for PCBs to the southeast. If this area was previously remediated, please present documentation to demonstrate that further PCB delineation is not warranted.
- B3619 at 2-4 ft bgs (PCBs at 85 – 108 mg/kg) requires vertical IRM Excavation delineation greater than 4 ft bgs to determine the depth of the PCB TSCA material within the proposed areal 2-4 ft bgs IRM excavation footprint.
- B3073 at 4-6 ft bgs (Total PAHs of 984 mg/kg); vertically delineated; requires additional SVOC PDI sampling and areal IRM Excavation delineation to the west.
- B3454 at 12-14 ft bgs (PCBs 30.3 mg/kg); not vertically delineated; boring location contains elevated concentrations of PCBs of 13,180 mg/kg at 22-24 ft bgs. The proposed IRM Excavation area extends to B3014 which is only advanced to 12 ft. Additional PCB PDI sampling and areal and vertical IRM Excavation delineation of soils greater than 12 ft bgs to the north, northeast, and northwest is required.
- B3455 at 14-16 ft bgs (PCBs 17.1 mg/kg); vertically delineated; requires additional PCB PDI sampling and IRM Excavation areal delineation to the southeast, east, and northeast of PCB impacts in soils greater than 16 ft bgs.

Further CPOC Nature and Extent Delineation/Clean PDI Delineation:

- B3063, B3319, B3077, and B3313 at the 2-4 ft bgs (Metals) require areal and vertical delineation for Metals. IRM excavation bounded by B3632, B3520, B3314, and B3633 Metal results exceeding screening levels.

- B3304 at 2-4 ft bgs (Total PAHs of 188 mg/kg); vertically delineated; requires areal delineation for SVOCs. IRM excavation bounded by B3303, B3061A, B3248, B3630 and B3062 SVOC results exceeding screening levels.
- B3286 at 2-4 ft bgs (Total PAHs of 156-188 mg/kg); vertically delineated, requires areal delineation for SVOCs. IRM excavation bounded by B3285 and B3627 SVOC results exceeding screening levels.
- B3490A at 2-4 ft bgs (Total PAHs of 156 mg/kg); vertically delineated; requires areal delineation for SVOCs off-Site to the northwest/west. IRM excavation bounded by SVOC results exceeding screening levels. This portion of the figure is very congested and sample result illustrations and/or sample IDs are illegible.
- Further off-Site areal and vertical delineation is required at the 0.17-2 ft interval for SVOCs and Metals along the western and southwestern Site boundaries.
- B3505 (0.17-2 ft bgs), indicated in Table 1A as exceeding the PCB Action Level with a concentration of 37.85 mg/kg, is not illustrated on the Figures. B3505A is illustrated on the Figures, but not included within the analytical tables. Clarify the sample location within Figure 1B and denote the required soil area excavation as non-hazardous material.

3. Provide an investigation report that evaluates the nature and extent of impacts based on the sampling data collected. The report should include detailed summaries and evaluations of the current site impacts for all media. This information is essential in evaluating current and future exposure pathways to determine if the remedy is protective of public health.

4. Site Preparation: All new stockpile and haul road areas should be sampled prior to construction of these areas and resampled after decommissioning especially in the event these areas are placed over remediated areas.

5. Confirmation Sampling: Include PAHs, SVOCs, DRO or VOCs in the confirmation sampling for any areas where these analytes were elevated and/or are driving the remedial elements.

6. Backfilling: “Previously unidentified subsurface structures encountered within the excavation shall be left in place if removal is impractical or will impact the schedule for completion of the IRM.” Please note that actions associated with previously unidentified subsurface structures will be based on characterization and evaluation of the structure and will not be dependent on site schedule. Impacted media and potential source areas must be evaluated and remediated according to the workplan.

7. Site Restoration: Elaborate on the cleaning or decontamination of areas potentially impacted by dust from IRM excavations. Anticipated cleaning areas and procedures should be provided to the NYSDEC and NYSDOH for final approval of these actions.

8. Figures: Provide figures outlining data for all intervals sampled.

9. Figure 2: Include groundwater data and flow direction.

10. Figure 4: Tisch sampler locations should be modified to be representative of the work areas, closest receptors, and weather conditions. The current locations may not adequately evaluate airborne PCBs for residential areas on South Main Street and O' Gorman Street during all proposed excavations.

11. Construction Drawing Plan Deficiencies:

- Drawing 2: Please indicate future location of the following IRM site work plan items:
    - construction trailers
    - employee parking
    - employee construction entrance
    - haul truck/heavy equipment construction entrance
    - export truck loading area
    - export truck decontamination pad
    - onsite haul truck decontamination pad
- Drawings 7-14: Within excavation polygons, soils to be removed are not fully described or depicted in the legend. Please correct and fully represent all soils to be removed with individual graphical representation (i.e. reuse)
    - Remove references to IRM#6 and correct to IRM#5A2 as needed.
    - Adjacent to "batting cage" excavation limits exceed LOD towards the North West. Please correct.
- Drawing 21 appears to be incomplete; please include all details of restoration.

12. Note: To address deficiencies noted in Comment No. 10, NYSDEC will propose for discussion an alternate plan for construction sequencing that facilitates the site objective.

The following comments are associated with the ECSD comment letter dated March 23, 2021:

13. ECSD comments 1a, 1b, 1c, and 1d which address the scope of removal and replacement of the irrigation system are to be addressed in the work plan.

14. Stormwater/Drywells comments (2a, 2b, and 2c) which speak to: (1) the removal, characterization, and replacement-in-kind of the 3 existing drywells, and (2) request for a Stormwater Pollution Prevention Plan are to be addressed in the work plan.

15. Restoration Plan comment 3a which requests detail for proposed restoration in the top 2 feet of grade is to be addressed in the work plan in accordance with the existing agreement with ECSD.

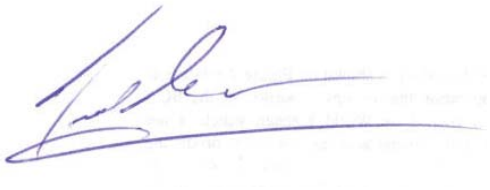
16. Sports lighting comments 4a, 4b, and 4c, are to be addressed in the work plan.

17. Removal of the practice wall and scoreboard in the North Athletic Field is to be addressed in the work plan. It is noted that these features are shown on Demolition Plan #5.

18. As requested in comment 6, provide a contingency plan to protect neighboring properties during remediation activities.

Time is of essence, please submit a revised schedule addressing comments 1-17 within 5 days If you have questions, feel free to contact me at (585) 226-5480 or set up a conference call to discuss.

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

HSE
Harter Secrest & Emery LLP
ATTORNEYS AND COUNSELORS
WWW.HSELAW.COM

March 23, 2021

VIA EMAIL

Mr. Timothy Schneider, P.E.
New York State Department of Environmental Conservation
Region 8
6274 East Avon-Lima Road
Avon, New York 14414

Re: Comments to IRM #5 Work Plan, Amendment #2, Site #c808022

Dear Mr. Schneider:

The Elmira City School District ("ECSD") submits the following comments to the Amendment #2, Interim Remedial Measures #5 Work Plan for the Former Sperry Remington Site – North Portion (#c808022) dated March 12, 2021 ("IRM #5 WP, A2") submitted by B&B Engineers & Geologists of New York, P.C. on behalf of Unisys Corporation ("Unisys") to the New York State Department of Environmental Conservation ("NYSDEC") and others via email. While ECSD has typically addressed its comments to Unisys, in this instance IRM #5, WP, A2 was not provided to ECSD for review until the afternoon of March 10, 2021, allowing for insufficient time to review and comment. Therefore, the following comments and questions are being provided directly to NYSDEC with a copy to Unisys.

ECSD's comments are as follows:

1. Irrigation System:

   a. The irrigation system is not shown on the Existing Conditions Drawing #2 but is shown generally on Utilities Removal Drawing #6. This drawing does not show the location of irrigation system valves nor the control wiring.

   b. Since more that 80% of the irrigation system is shown to be removed and because the areal extent of disturbance for remediation will very likely be further expanded during the work - which has occurred during each and every other IRM to date - the plan should call for the entire irrigation system to be removed and replaced.

   c. No plans show the restoration/replacement of the irrigation system, including Restoration Plan Drawing #20.

   d. From a recent conversation between ECSD and Unisys, it is ECSD's understanding that Unisys will be replacing the entire irrigation system. ECSD must review and approve revised drawings and specifications concerning the replacement of the entire

irrigation system. For purposes of the new irrigation system design, all irrigation heads must be sport field heads with rubber caps. Swing arms must be installed to lateral lines. Hunter I-40 or Toro T7 are preferred heads.

2. Stormwater/Drywells:

   a. ECSD understands there are at least 3 drywells located in the North Athletic Fields, parking lot and/or volleyball court areas yet none are shown on any of the drawings or otherwise mentioned in this work plan amendment. All drywells and any other existing stormwater management systems in the area covered by this work plan amendment need to be shown.

   b. How are existing drywells and other stormwater management systems to be addressed? All drywells should be removed and the adjacent areas tested, if not already done so, to confirm no additional excavation is required. An alternative stormwater management system should be designed and installed to replace them. It is ECSD's understanding that drywells are no longer a permitted means of stormwater management.

   c. While an Erosion and Sediment Control Plan is provided, no Stormwater Pollution Prevention Plan has been submitted for the restoration of this area. What are the stormwater management requirements for the restoration of this area, particularly given the fact that Reuse Soils are likely to be used as part of the restoration and old drywells should be removed?

3. Restoration:

   a. The Restoration Plan, Drawing 20 shows only restoration to approximately 2 feet below estimated final grades. A complete restoration plan needs to be provided.

   b. Note that ECSD and Unisys are in discussions concerning a final restoration plan that may include a "flipping" of the softball field at its current location and slight shifting of the baseball field.

4. Sports lighting:

   a. Existing sports lighting is not shown on any of the plans, including Existing Conditions Drawing #2.

   b. Some of the poles for the sports lighting appear to be within excavation areas and should be shown on demolition plans. Electric feeds need to be removed back to the panel, breaker removed, slot blanked off and panel updated.

   c. Other sports lighting at the northern most softball field can be removed as necessary and/or desired.

5. Removal of an existing practice wall and scoreboard in the North Athletic Fields are not shown.

6. Neighboring Properties:

a. A contingency plan to address remediation areas in close proximity to the property line should be prepared in advance to protect neighboring properties and to avoid delays. Will shoring be necessary as part of such a plan?

7. Schedule:

a. The schedule submitted with this work plan is not acceptable. ECSD has expressed for several months that the north athletic fields be completed with sod laid down by August 1, 2021 and the discus/shotput area turned over to ECSD by September 1, 2021. The schedule submitted does not reach "substantial completion" of the areas covered by this work plan amendment until August 23, 2021 and "Restoration (by others)" until "October 2021". What do these quoted terms mean? It would appear that "substantial completion" does not include complete restoration and greatly misses the mark of August 1, 2021 and September 1, 2021. Unisys is to restore the North Athletic Fields while ECSD will be restoring the discus/shotput area. Is "October 2021" the beginning or end of October? The more detailed schedule, Table 5 of the Work Plan document, is of no help because it does not even address final restoration. Laying of sod in October 2021 is far too late to allow the fields to be played on Spring 2022 and could create survivability concerns depending on exactly when the sod is laid and the weather in October. Does "substantial completion" include installation of the irrigation system? The irrigation system must be fully functional in order to water the sod. Turning over the discus/shotput area in October 2021is far too late for ECSD to complete the construction of the discus/shotput area and parking lot by the end of the construction season.

b. Work on weekends should be required to truncate the schedule along with providing additional crews, equipment and haul trucks to meet the August 1 and September 1 dates.

Because of the very critical schedule concerns expressed above, ECSD requests that NYSDEC make every effort to expedite its review and comment on the IRM #5 WP, A2 submission so that Unisys can make the appropriate revisions and begin the remedial work. ECSD also requests that Unisys begin making revisions to the work plan consistent with these comments to be in a position to commence work as soon as possible. Time is of the essence.

Very truly yours,

Harter Secrest & Emery LLP

Paul D. Sylvestri
DIRECT DIAL: 585.231.1194
EMAIL: PSYLVESTRI@HSELAW.COM

PDS:hlh
cc: J. Stenerson, Esq., DEC
H. Austin, ECSD

K. Krueger, Unisys
E. Parker, Esq., Unisys
M. Murphy, Esq., B&D
P. Brookner, Geosyntec
A. Krasnopoler, B&B Engineers
J. Magliocca, ECSD
T. Johnson, Sterling
S. Cyr, Hunt

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 I F: (585) 226-8139
www.dec.ny.gov

Via E-mail

May 21, 2021

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

Re: Revised Amendment #2
Interim Remedial Measure #5 Work Plan
Former Sperry Remington Site – North Portion (#c808022)
777 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 Amendment #2 Interim Remedial Measure #5 Work Plan, Former Sperry Remington Site – North Portion #c808022", submitted via email on April 30, 2021 and provide the following comments for revision below:

I. General Comments

A. Critical Delineation Data Gaps, Materials Management, Construction Sequencing

1. Delineation data gaps related to accessible TSCA / RCRA soils, particularly underneath the existing and planned Phase 1 MSA have the potential to critically impact construction sequencing and schedule as documented in the Agency's letter dated May 11, 2021.

2. The planned IRM excavation of TSCA / RCRA soils (AOC-19) and proposed Phase 1 Materials Storage Area (MSA) are not feasible (May 10, 2021 Agency Email).

3. Suggested modifications include (attached sketch):
    a. Phase 1
        1. Modify MSA conflicting with AOC-19 Excavation
        2. Concurrent completion:
            - IRM TSCA / RCRA deep excavations (AOC-19 / NAF)
            - IRM "Florida area" south of access road and turn over to ECSD for capital "parking lot / stormwater infiltration" improvements and potential temporary rally point area prior to the start of the 2021-2022 school year **(May 14, 2021 Elmira City School District (ECSD) Comment No. 2.B.1)**

b. Phase 2
   1. Establish VFW north access / construction staging / MSA modifications
   2. IRM completion of “Florida area” and turn over to ECSD for Shotput Area restoration.
   3. Remaining NAF IRM excavations and field restoration

4. Additional information is required regarding the transition between Phase I and Phase II sequencing including the extent of the identified areas, the required movement of supporting infrastructures (i.e, support trailers, haul roads, etc.) and material storage areas. An updated set of sequencing drawings shall be provided.

   (ECSD Comments within No. 1. C)

B. Inconsistency with IRM and restoration plan elevations

5. Unisys shall verify that IRM excavation elevations and coordinating restoration plans provide a minimum of two feet of clean soil cover within the NAF area. **(Comment No.1. B.1)**

C. Existing Soil Cover Quality (outside of areas of planned remediation

6. Unisys shall depict the extent of surface areas outside of the planned IRM excavation and verify with data restricted residential soil quality standards consistent with Agency soil screening guidance for the top 2 feet. **(ECSD Comment No.1. B.1)**

D. Other Data Gaps and Plan Updates

7. The extent of the proposed IRM excavation limits shall be modified as required upon the collection of additional soil and groundwater data from the NAF in accordance with the approved as modified Soil and Groundwater Investigation Work Plan Addendum – NAF agency comment letter dated May 11, 2021 and subsequent conference calls pertaining to required NAF data collection.

8. The soil quality in the vicinity of the drywells shall be verified upon the collection of additional soil data from the NAF in accordance with the approved as modified Soil and Groundwater Investigation Work Plan Addendum – NAF agency comment letter dated May 11, 2021 and subsequent conference calls. Regarding the use of drywells onsite, refer to agency direction in its May 19, 2021 email to Unisys and ECSD.

9. Comprehensive waste characterization data shall be presented along with a discussion regarding proposed live-loading of non-hazardous and TSCA soils for off-Site disposal during the IRM excavation.

10. All data collected within the NAF shall be compiled within comprehensive analytical results figures and summary tables for all soil sampling intervals collected and submitted under separate cover.

II. Construction Drawings

11. Provide intermediate grading plan confirming that a demarcation layer under a two-feet soil cover will be in place throughout excavation areas following restoration.

12. All drawings: All known utilities shall be shown on relevant drawings as needed. For example, the Natural Gas Line appears truncated at South East corner of the LOD.

13. All relevant drawings: Clearly identify catch basins and drywells.

14. Confirm that IRM grading plans (Drawing 4) and NAF Restoration plans (Drawing C-5.0) demonstrate minimum of two feet cover above final IRM grading plan. If a minimum of two feet clean cover is not included, revise proposed IRM grading plans to accommodate as needed.

15. Drawing 7: Limits of Excavation (LOE) extend beyond Limits of Disturbance (LOD) along the southern boundary of the NAF: Correct and maintain LOE within LOD.

16. Drawing 18, Detail 31 Excavation Backfill: Material approved as reuse shall be covered with a demarcation layer and a minimum of 2 feet clean cover. Update Detail 31 to include these required elements.

17. Drawing 20: Legend identifies two areas described as “Excavation area to be restored by IRM contractor” and “Areas outside of limit of excavation to be prepared for ballfield restoration”. These descriptions appear to reference the incorrect hatched area designations. Additionally, provide more detail with respect to “areas outside of limits of excavation” including need for demarcation layer and clean cover.

(ECSD Construction Drawing Comment Nos. 2A through 2G)

III. Unisys Work Plan Letter

18. *Soils*, Page 6: “Therefore, Protection of Groundwater SCOs are not applicable as IRM action levels for soils below two (2) feet bgs with the exception of total PCBs at fourteen (14) to sixteen (16) ft bgs based on detections of PCBs in groundwater.” Based on known groundwater impacts and the on-going evaluation of soil and groundwater below 14 feet, protection of groundwater SCOs shall continue to be evaluated for all constituents until sufficient data has been provided to determine that additional actions will not be required to address these site impacts during the IRM activities.

19. *Purpose*: Include in the “Purpose” section the statement that “Proposed excavations are subject to change pending the results of data collected as part of Soil and Groundwater Investigation Work Plan Addendum, Northern Athletic Fields (Attachment 3).”

20. *Purpose*, Page 8: include statement “below two (2) feet bgs” to bullet points three and four with respect to lead and metals concentrations.

21. *Purpose*: add applicable information verifying that sufficient samples have been collected to satisfy the requirements of the Soil Screening Guidance within the NAF and all ISMP areas within the NAF.

22. *Site Preparation*, Page 9, last sentence of first paragraph: Provide figures showing location of existing and proposed dry wells with surrounding soil quality data.

23. *Site Preparation*, Page 9: Provide a summary of proposed sampling to be completed under the stockpile and haul roads prior to final cover. For previously uncharacterized areas, sample intervals 0-2 inches, 2-12 inches, and 12-24 inches are to be included with a representative number of full suite samples.

24. *Excavation*, Page 9, last sentence of third paragraph: Samples from the 0 – 2 ft bgs interval collected as documentation samples that exceed the shallow soil clean up objective shall be removed as part of the IRM in accordance with 0-2 ft soil clean up objectives.

25. *Soil Management Section*, Page 10, first bullet point: The location of “layback soils outside of the extent of the soil cover system” shall be clarified in the work plan text and designated on figures as applicable.

26. *Metals Handling*, Page 11, third paragraph: Areas with elevated metals concentrations shall be staged on 30-mil LDP sheeting with hay bale berm within excavation limits only, or within an approved material staging area consistent with drawing 15, detail 21 (windrow stockpile).

27. *Metals Handling*, Page 11, fourth bullet point: RCRA Accumulation Area was previously constructed during IRM 5 - update the text accordingly.

28. *Obstructions*, Page 13: State that obstructions encountered such as former industrial sewer will be chased beyond limits of excavation as required.

29. *Backfilling*, Page 17: Revise to state that the backfill depths will be certified by a PE or QEP to confirm that the backfilling operations have met the remedial goals (i.e., 2 foot cover, demarcation layer, etc.)

30. *Backfilling*, Page 17: Reuse soils will not be used within one foot of the seasonal high water table level. Clarify at what depth the highwater table level is anticipated and what depths the reuse soils will be used.

31. *Site Restoration*, page 18, Site Restoration section: Change “verification” to “documentation”.

32. *Site Restoration*, Page 18: Details will need to be provided on the final site cover for the entire area within the expected limits of disturbance for the NAF IRM (i.e structures, new/existing soil cover, final cover, etc.). The provided construction details are missing information on the shot-put areas and areas where the final cover is not directly related to excavations (i.e. 6 inches of topsoil in the north NAF area).

33. *Site Restoration*, Page 18: Provide a figure showing the areas where the current soil will remain as a site cover. An evaluation of the areas that will remain as site cover

is required as part of the final remedy design and the human health exposure assessment. The evaluation should include a summary of all analytes and determine if there are any contaminants that exceed the restricted residential SCO resulting in a potential exposure pathway.

34. *Figure 3A*: Additional characterization is necessary to evaluate the potential for exposures in the 0-2 inch interval on the south side of O' Gorman Street. Provide additional full suite sampling of this interval.

35. *Figure 3A – 3I*: Include Limits of contours for proposed excavations as shown on construction drawing on figures 3A – 3I "proposed excavation" consistent with figures from Final 100% IRM#5 Work Plan dated November 24, 2020.

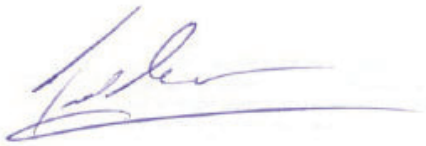
36. *Figure 3J – 3M:* Remove reference to "Action Limits" within the Legend of Figures 3J through 3M.

37. Figure 5: Provide an additional TISCH unit south west of AOC-19 in the direction of O'Gorman Street properties.

Please revise the IRM #5 A2 Work Plan and resubmit as soon as possible. Under separate cover, please provide a response to the ECSD comments pertaining to the "Revised Amendment #2, Interim Remedial Measure #5, Northern Athletic Fields" contained as Attachment 1 of this comment letter.

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

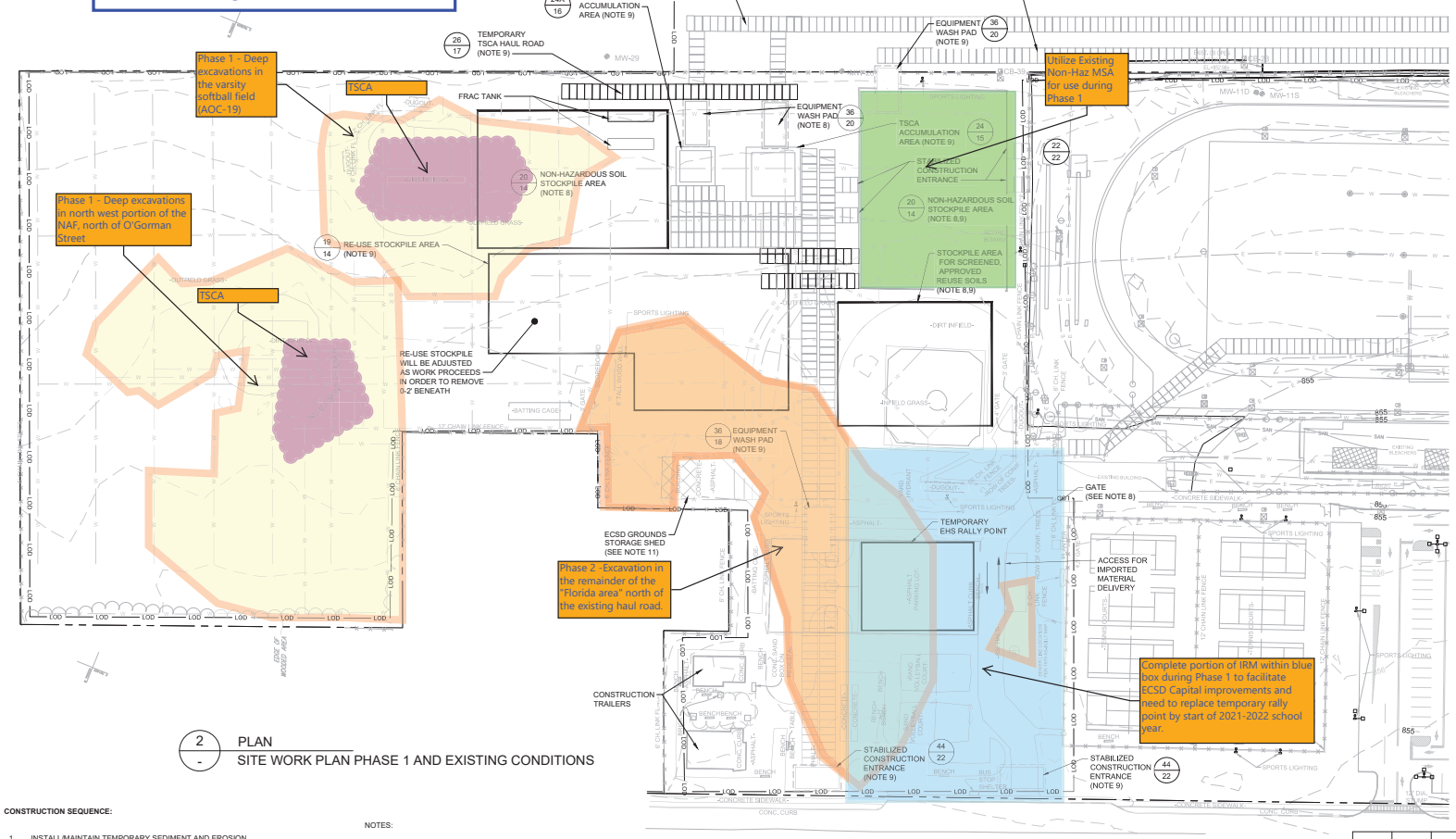
Sincerely,



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

Agency Sketch
Construction Sequencing
5-21-21



2 / - PLAN
SITE WORK PLAN PHASE 1 AND EXISTING CONDITIONS

LEGEND

- MANHOLE
- CATCH BASIN
- MANHOLE
- CULVERT PIPE
- CHAIN LINK FENCE
- WOODEN FENCE
- PROPERTY LINE
- EXISTING CONTOUR LINE
- EDGE OF WATER
- EDGE OF WOODS OR BRUSH
- BURIED ELECTRIC CABLE
- SANITARY SEWER
- STORM SEWER
- NATURAL GAS LINE
- WATER LINE
- EXCAVATION LIMITS
- LIMIT OF DISTURBANCE
- BURIED FIBER OPTIC CABLE
- TREE

CONSTRUCTION SEQUENCE:

1. INSTALL/MAINTAIN TEMPORARY SEDIMENT AND EROSION CONTROLS IN ACCORDANCE WITH APPROVED SWPPP.
2. CLEAR THE CONSTRUCTION AREA WITHIN LIMITS OF DISTURBANCE.
3. EXCAVATE ACCESSIBLE SOILS TO THE GRADES SHOWN ON DRAWING 4. SEE SECTION 02 61 13. SEGREGATE INTO SOILS WITH TOTAL PCBS ≥ 50 MG/KG FOR DISPOSAL, SOILS WITH TOTAL PCBS < 50 BUT ≥ 10 MG/KG FOR DISPOSAL, AND SOILS WITH TOTAL < 10 MG/KG FOR POTENTIAL RE-USE AS BACKFILL AS SHOWN ON DRAWINGS 10 TO 16.
4. REMOVE EXISTING UTILITIES WITHIN LIMITS OF EXCAVATION AS SHOWN ON DRAWINGS 7 IN ORDER TO COMPLETE EXCAVATION. CAP OR OTHERWISE PRESERVE ENDS OF UTILITIES TO ENABLE RE-CONNECTION IN-KIND REPLACEMENTS. REMOVED UTILITIES SHALL BE CHARACTERIZED FOR OFF-SITE DISPOSAL.
5. BACKFILL THE EXCAVATION USING STOCKPILED SOILS THAT ARE APPROVED FOR RE-USE. SEE DETAIL 31 ON DRAWING 19. CONFIRMATION SAMPLING AND APPROVAL TO BACKFILL SHALL BE REQUIRED PRIOR TO BACKFILLING.
6. KEEP THE EXISTING TSCA AND RCRA STOCKPILES AND SOIL REMOVAL HAUL ROADS. DECOMMISSION AND DECONSTRUCT ALL NON-HARZARDOUS AND RE-USE STOCKPILES AND ASSOCIATED HAUL ROADS AS WELL AS ANY REMAINING HAUL ROADS AND STOCKPILES ON NSRC PROPERTY.

NOTES:

1. ALL WORK SHALL BE COMPLETED IN ACCORDANCE WITH THE APPROVED IRM WORK PLAN. ANY PROPOSED MODIFICATION TO THE WORK PLAN MUST BE APPROVED BY NYSDEC.
2. CONSTRUCTION TRAFFIC PATTERNS MAY BE MODIFIED BY CONTRACTOR AS NECESSARY SUBJECT TO ENGINEER APPROVAL.
3. TREES AND WOODY VEGETATION SHALL BE CUT FLUSH WITH THE GROUND SURFACE AND DISPOSED OF OFF-SITE AT A PERMITTED LAND CLEARING MANAGEMENT FACILITY. ROOT BALLS SHALL BE MANAGED IN ACCORDANCE WITH THE SOILS MANAGEMENT PLAN. STUMPS SHALL BE GROUND UP IN-PLACE AND WOOD CHIPS MANAGED WITH THE SOILS MANAGEMENT PLAN.
4. CONTRACTOR SHALL INSTALL TEMPORARY 6-FOOT TALL CHAIN LINK FENCING AROUND THE LIMITS OF CONSTRUCTION. FENCING SHALL INCLUDE VISUAL SCREENING.
5. TEMPORARY TSCA TRANSIT ROAD SHALL BE PLACED OVER NON-TSCA AREAS WHEN BRINGING SOILS WITH ≥ 5O MG/KG PCBS TO THE TSCA ACCUMULATION AREA.
6. CONTRACTOR SHALL PROTECT EXISTING MONITORING WELLS WITHIN THE LIMIT OF DISTURBANCE DURING CONSTRUCTION AND RESTORE ACCESS DURING SITE RESTORATION.
7. CONTRACTOR SHALL MAINTAIN ACCESS ECSD PERSONNEL TO GROUNDS STORAGE SHED AND CONCESSION STAND STORAGE.
8. TEMPORARY FACILITIES CONSTRUCTED DURING IRM #4 AND IRM #5 WILL BE UTILIZED AS SHOWN.
9. STOCKPILE AREAS, TEMPORARY HAUL ROADS AND THE RCRA AND TSCA ACCUMULATION AREAS SHALL BE DECOMMISSIONED AT THE END OF PHASE I. RESTORATION SHALL INCLUDE REMOVAL OF UP TO 2 FEET OF SOIL BELOW EXISTING GRADE IN AREAS NOT DESIGNATED FOR EXCAVATION.

GENERAL NOTES:

1. EXISTING TOPOGRAPHY IS FROM:
   a. A TOPOGRAPHIC SURVEY OF ELMIRA HIGH SCHOOL BY HUNT ENGINEERS, ARCHITECTS, AND SURVEYORS IN SEPTEMBER 2016. VERTICAL CONTROL IS REFERENCED TO THE NORTH AMERICAN VERTICAL DATUM OF 1988 (NAVD 88/GEOID 12A), HORIZONTAL CONTROL IS REFERENCED TO THE NORTH AMERICAN DATUM OF 1983 (NAD 83/NA 2011).
   b. A TOPOGRAPHIC SURVEY OF ELMIRA HIGH SCHOOL BY FAGAN ENGINEERS IN MAY 2019 - 18064-A SENT 2019-5-24.DWG
2. UNDERGROUND UTIULITIES SHOWN WERE MAPPED USING A COMBINATIONOF OF FIELD LOCATED EVIDENCE AND EXISTING UTILITY MAPS. THE ACCURACY OF THESE UTILITY LOCATIONS CANNOT BE GUARANTEED. ALL UNDERGROUND UTILITIES SHOULD BE FIELD VERIFIED BEFORE EXCAVATING. CALL "DIG SAFELY NEW YORK" 1-800-962-7962.

0 50' 100'
SCALE IN FEET

CONSTRUCTION DRAWING

REV	DATE	DESCRIPTION	DRN	APP
1	5/4/2021	RESPONSE TO AGENCY COMMENTS		

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

UNISYS

TITLE: SITE WORK PLAN PHASE 1 AND EXISTING CONDITIONS

PROJECT: INTERIM REMEDIATION MEASURE #5 AMENDMENT #2

SITE: FORMER SPERRY-REMINGTON SITE - NORTH PORTION ELMIRA, NEW YORK

SIGNATURE
5/4/2021
DATE

STATE OF NEW YORK · ANDREW KIRABAYEVICH · 089954-1 · LICENSED PROFESSIONAL ENGINEER

DESIGN BY:	DG	DATE:	MARCH 2021
DRAWN BY:	AM	PROJECT NO.:	MN0832I
CHECKED BY:	TBR	FILE:	MN0832I-503-01
REVIEWED BY:	AK	DRAWING NO.:	2 OF 23
APPROVED BY:			

P:\cad\PROJECTS\Unisys - Elmira NY (MN0832I)\MN0832 IRM\MN0832I-503-01.dwg
Berlock - 5/4/2021 4:36 PM

HSE
Harter Secrest & Emery LLP
ATTORNEYS AND COUNSELORS
WWW.HSELAW.COM

June 24, 2021

VIA EMAIL

Mr. Aron Krasnopoler, Ph.D., P.E.
B&B Engineers & Geologists
10211 Wincopin Circle, Floor 4
Columbia, Maryland 21044

Re: Comments to Response to NYSDEC and ECSD Comments to Revised IRM #5 Work Plan, Amendment #2, Site #c808022

Dear Mr. Krasnopoler:

The Elmira City School District ("**ECSD**") submits the following comments to B&B Engineers & Geologists of New York, P.C.'s Response to New York State Department of Environmental Conservation ("**NYSDEC**") and ECSD comments to Amendment #2, Interim Remedial Measures #5 Work Plan for the Former Sperry Remington Site – North Portion (#c808022) dated June 14, 2021 submitted on behalf of Unisys Corporation's ("**Unisys**") ("**Unisys Response Letter**"). The following comments and questions are being provided directly to Unisys with a copy to NYSDEC and are presented based upon either a specific topic, response, and/or drawing number, as appropriate.

1. **General Comment**

   ECSD previously provided comments to the Amendment #2, Interim Remedial Measures #5 Work Plan ("**IRM #5 WP, A2**") by letter dated May 14, 2001. Not all of those comments were addressed in the Unisys Response Letter. In addition, there are numerous instances in the Unisys Response Letter where Unisys states that the comment will be addressed or a drawing revised without attaching the proposed revision. Without the benefit of seeing a revised IRM #5 WP, A2 that includes all drawings, including but not limited to those drawings that cover the complete restoration of the North Athletic Fields ("**NAF**"), and the revised work plan text, figures and tables, ECSD cannot properly evaluate whether all of its comments have been addressed. ESCD will provide further comments after receiving the next draft of the complete IRM #5 WP, A2.

2. **Schedule / Sequence**

   A. The schedule provided shows a short duration for field "restoration" at the end. ECSD assumes this is Recon's restoration activity only and that athletic field restoration associated with SWBR/Marathon's drawings is a separate activity that

1600 BAUSCH & LOMB PLACE ROCHESTER, NY 14604-2711 PHONE: 585.232.6500 FAX: 585.232.2152
ROCHESTER, NY • BUFFALO, NY • ALBANY, NY • CORNING, NY • NEW YORK, NY

would follow. No schedule for complete athletic field restoration has been provided to allow ECSD to understand the implications of the full project scope and potential duration of activities. Please provide a full and complete project schedule with anticipated commencement and completion dates. Such a schedule should include the complete restoration of the NAF and turnover of the shot put/discus to ECSD after establishing interim grades, as well as other key activities that can have an impact on timing. Such activities include but are not limited to deconstruction of the haul road that runs past the current rally point, any further soil sampling activities (e.g., in-situ soil/waste characterization and soil cover verification), and the removal or relocation of soil and material storage areas. While ECSD understands that the completion date is not guaranteed this far in advance, ECSD has struggled with not having such a projection when looking at the past schedules for the Stadium project. ECSD understands that the projected end date may be adjusted through the course of the project as new information is received. Given that the work in the NAF likely extends into the start of the 2021-2022 school year combined with the inability to finish the Stadium project this Fall, knowing the estimated end date for NAF completion allows ECSD to adjust its school operations more effectively to the extent any adjustments can be made.

B. Obviously ECSD is dismayed that despite talking about the NAF for more than a year and making it well known that use of these fields for Spring 2022 sports was an important consideration, the NAF work will not be completed for use in Spring 2022. While the Settlement Agreement between ECSD and Unisys does not specify dates of completion of the IRM work being conducted, it requires that Unisys coordinate their "remaining Remedial Project work on the Site to avoid scheduling delays, maintain safety and avoid harm to property". Settlement Agreement at 2(c)(iv). The work under IRM #5 WP, A2 constitutes "Remedial Project work" under the Settlement Agreement. In addition, "Unisys and its contractors shall use best efforts to minimize interference with school activities and operations at the Site". Settlement Agreement at 2(d)(i). There is no question here that failure to have the NAF ready by Spring 2022 — particularly in conjunction with the track and football field not being ready in time because of delays occurring during the Stadium area's remedial effort — that the school's activities and operations will be greatly impacted. In addition to having to schedule the high school's spring sports at other locations, certain physical education activities will need to be altered or eliminated altogether while other activities will have to occur at other sites, requiring the transportation of students. This will create both disruption to the students and teachers and ECSD having to incur significant costs. Frankly, ECSD is uncertain at this time what adjustments it will be able to make.

Since the purpose of this letter is to provide comments to develop a suitable work plan for the next phase of IRM work, ECSD will not be using this forum to set forth past instances where Unisys has not met the above referenced commitments. However, to be clear, ESCD does not agree with statements in the Unisys Response Letter that Unisys has used best efforts and worked as expeditiously as possible. By not providing such details in this letter, ECSD does not waive any of its rights under the Settlement Agreement.

In the spirit of moving forward and in order for Unisys to meet its commitments under the Settlement Agreement, Unisys should consider and implement any and all options to expedite the schedule, including but not limited to adding additional equipment, crew, and professional oversight to the maximum extent possible given space constraints, direct loading of all waste materials to allow for more space, designing remedial excavations to minimize the likelihood of step outs, reducing laboratory turn around times, and employing a second option for laboratory services to avoid the bottleneck of sample analyses that have historically resulted in delays. Please propose and implement any other procedures that can expedite the schedule to minimize impacts to school operations and explain in the work plan text where and how these procedures will be applied to the proposed work.

3. **Clearing of the NAF for Remedial Work**

At this time there is a significant amount of soil/waste stored on the NAF that will take time to either relocate or remove from the Site. It is ECSD's understanding that none of these stored soils are suitable for reuse. Have these soil piles been sampled for off-site disposal yet? The revised work plan should include the plan and timing for these soil piles, including any sampling required for off-site removal.

4. **Deconstruction of Haul Road and Use of VFW Haul Road**

When will the existing haul road that runs past the current rally point be deconstructed? The proposed schedule presented with the Unisys Response Letter fails to identify this task. Consideration should be given to constructing the VFW haul road earlier, even before formal start of IRM #5, A2, and using both haul roads to remove the existing soil piles on the NAF. This should allow for an earlier start to the remedial excavations and create room for more crews to conduct excavation work.

5. **Cover System at Non-Remediation Locations**

The Unisys Response Letter is unclear as to whether Unisys believes existing data as demonstrated through the "measles" figures it provided indicate that areas outside the remediation areas constitute clean cover or if Unisys plans to perform additional

sampling and analysis. ECSD's confusion applies to Responses ##6, 21, 32 and 33. The NYSDEC soil screening guidance in Section 5.4(e) of DER-10 referenced in those responses is applicable to sampling imported or reuse soil or fill and is not meant as a guide for evaluating in-place soil such as the surface areas outside the planned IRM excavations. The guidelines provided in Chapter 3, Site Characterization and Remedial Investigation, of DER-10 should be used to develop a sampling strategy that meets the objectives of DER-10 for site characterization to evaluate soil quality of surface areas outside the planned IRM excavations if, in fact, insufficient data currently exists. Should additional data be necessary, the plan to generate that data must be developed and work implemented immediately and in a manner that does not further impact the schedule. If in fact this work is still required, ECSD fails to understand why it has not been performed prior to now and how waiting until now – when performing such work impacts a tight schedule – constitutes best efforts.

6. **Comprehensive Waste Characterization / Live-Loading of Impacted Soils**

   A. The IRM #5 WP, A2 states non-hazardous soil will be stockpiled and managed as it has in the past for off-site disposal. Please provide a copy of the June 11 sampling plan for in-situ waste characterization of non-hazardous soil referenced in Response #9 of the Unisys Response Letter and explain why direct-load of non-hazardous soil is being proposed. Please also provide an explanation as to why only non-hazardous and not hazardous soil is proposed for direct load-out.

   B. The work plan should be revised to provide the details and rationale as to how soil proposed for direct load-out is to be managed. ECSD would support direct load out of both hazardous and non-hazardous soil if it results in an expedited schedule. An in-situ waste characterization process can not result in additional delays. ECSD notes that this additional testing does not appear on the schedule provided with the Unisys Response Letter; however, the Unisys Response Letter appears to indicate changing the process to live-loading of certain impacted soils. Please specifically explain how or if direct-load will expedite the schedule.

7. **Presentation of Comprehensive Analytical Results / Step Outs (Page 4, #10)**

   The RI and PDI data collection in the NAF must be presented in a comprehensive, efficient, and usable form. The "measles" maps are not sufficient. The July 2nd submission is critical information with regard to evaluating extents of excavation and strategies for minimizing time-consuming step outs during field work which have caused protracted schedule delays in the past. ECSD respectfully requests that all parties carefully review that data with the goal of finalizing remedial excavation limits that reduce the likelihood of step outs.

8. **Use of Soil Screening Guidance (Page 6, #21)**

   The NYSDEC soil screening guidance in Section 5.4(e) of DER-10 is applicable to sampling imported or reuse soil or fill and is not meant as a guide for evaluating in-place soil in the NAF and ISMP areas within the NAF. The guidelines provided in Chapter 3, Site Characterization and Remedial Investigation, of DER-10 should be used to develop a sampling strategy that meets the objectives of DER-10 for site characterization to evaluate soil quality in the NAF and ISMP areas within the NAF.

9. **Final Site Cover (Page 8, ##32 and 33)**

   The response to Comments ##32 and 33 again reference soil screening guidance in Section 5.4(e) of DER-10, which is applicable to sampling imported or reuse soil or fill. Plans to characterize in-place soil in the surface areas outside the planned IRM excavations should be based on the guidelines provided in Chapter 3, Site Characterization and Remedial Investigation, of DER-10. All parties must have a clear understanding of what constitutes final cover in the NAF (which include the shot put/discus area) and the work to produce such a final cover must be conducted as part of this IRM in combination with the anticipated ISMP for the shot put/discus areas to avoid future disturbance of these areas

10. **Softball Field (Page 13, Item C.2)**

    The Unisys Response Letter indicates that revised plans will show limits of excavation that require removal of the existing backstop and dugout mulch bed locations. The response is silent regarding replacement of these elements of the softball field. ECSD needs to begin planning for use of these fields and further discussion with Unisys is needed on what is being replaced and the details of replacement in order for this planning to proceed. See below for a follow up meeting request with Unisys as soon as possible to discuss and finalize such matters.

11. **Wood Practice Wall (Page 14, Item C.6)**

    Apparently, there was a misunderstanding. ECSD would like the wood wall to be relocated to an area between the softball and baseball field. ECSD will contact Marathon and/or Unisys to provide the exact location.

12. **Softball Field Light Poles (Page 14, Item C.6)**

    The Unisys Response Letter indicates that removal of electrical feeds to the old light poles will occur "where encountered". Drawings must specify that all electrical wiring for these poles be removed back to the panels. No wire shall be left abandoned in place.

13. **Irrigation Removal (Page 15, Item D.1)**

The Unisys Response Letter indicates that all irrigation heads associated with the old system will be removed in their entirety. Based on prior conversations with Unisys, all valve boxes associated with the old system are also to be removed. Where head removal takes place outside the limits of disturbance, vertical risers to bottom of head need to be removed to prevent potential impact with cultivation practices (aeration) in the future. Horizonal lateral lines at depths greater than 12" can be abandoned in place. Please revise plans accordingly.

14. **SWPP / Dry Wells (Page 15, Item D.4)**

ECSD requests confirmation that NAF work has been submitted to NYSDEC Division of Water and approved, or that submission of project and associated storm water scope is not required by NYSDEC Division of Water. ECSD wishes to avoid confusion over the storm water management issues that could cause delay.

15. **Geosyntec Figure 3, SVOC Exceedances in Soil**

ECSD notes that there are several red dots indicating exceedances located between the tennis courts and Main Street. These locations do not appear to be part of IRM #5 WP, A2 at this time. Will remediation of soils in this area be required based on the data? If so, will this remediation be part of IRM #5, A2 or a future IRM?

16. **Geosyntec Drawing 4, Grading Plan**

ECSD notes that remediation at the shot put/discus area (Zone B-1) will be by a separate crew from the northern most portion of NAF (Zone A-1). There are no updated phasing / sequencing plans to go along with this new information and scheduling. Will all soils to be removed by both crews be staged such that exit from site is via VFW to Miller Street or will the exit to Main Street be maintained for "B" crew? Alternatively, will all soil be direct loaded?

17. **Marathon Drawing C2.0, Demolition Plan**

Marathon noted they were unclear about ECSD's comment regarding fencing between the baseball and football fields. ECSD's Contract Documents for the Stadium project include replacement of chain link fencing from east side of first base dugout. The detail for this new fencing includes a concrete mow strip. HUNT has provided a CAD file to Unisys showing this fencing replacement. ECSD requests that this replacement scope be

indicated on Marathon's drawings as this component of ECSD's construction will need to be protected during remediation and restoration activities.

18. **Marathon Drawing C3.0, Layout Plan**

Regarding removal of vegetation behind baseball backstop, ECSD provides the following additional information and clarification. HUNT's Contract Documents for the Stadium project include removal of the existing plantings behind the baseball backstop. ECSD requests that removal of these plantings be shown on C2.0 "to be removed by others", and that these plantings not be shown on drawing C3.0.

19. **Marathon Drawing C4.3, Soil Management Plan (4 of 4) / Sod and Other Matters**

ECSD's proposed revisions to drawing C-4.3 is intended to cover active areas of the NAF based on historic use. Active use in fact includes practically the entire NAF except for areas close to the fence line. For purposes of resolving what does or does not constitute "active areas" for purposes of the Settlement Agreement and getting the fields restored properly, ESCD proposes that the area predominantly used for soccer/lacrosse practice be sod while the area between the soccer field and softball outfield be seeded. Please see the attached figure.

As to clay brick, ECSD believes clay brick is part of the present condition. Regardless, typical standards and details for new construction and renovation of baseball and softball fields always show clay brick installation on pitcher's mounds, batter's boxes and catcher/umpire areas. In ECSD's views including the clay brick is necessary to meet standards and not just simply an enhancement. ECSD requests a teleconference with Unisys to further discuss sod/grass, use of clay bricks, softball backstop, dugout design and irrigation head locations as soon as possible to work out final details.

All safety fencing/mesh should be black.

To the extent seed is used, ECSD rejects the proposed seed type on the drawings "Turface MFP by Seedway" As far as ECSD can tell, there is no such product. ECSD has indicated in the past that seeds at sport fields must be 100% KBG. With the exception of the perimeter of NAF, a 100% KBG seed mix is required to allow ECSD to rotate/adjust fields as necessary to resist constant wear. However, proper seed mix depends on application timing.

Spring-Early Summer:

Preferred Seed Better Blue KBG Blend/Custom- 100% Kentucky bluegrass seed mix. However, the 100% seed mix needs to be blended with 20% turf type annual rye. There will be a lot of weed pressure during this time, so the 20% turf type annual rye will help

establish lawn and outcompete weed pressure as the KBG seed establishes itself. Please contact Jack Bryant at Preferred Seed for additional information.

Late Summer:

Preferred Seed Better Blue KBG Blend

Starter fertilizer will be required in both instances and a plan to grow in for 3 months following.

ECSD expects it will have additional comments after seeing the complete, revised IRM #5 WP, A2. Additionally, ECSD believes that a follow up meeting with Unisys to discuss the replacement scope for several items noted in this letter is necessary. These items include: baseball/softball clay bricks, seeding vs sodding, softball backstop and dugout pads, baseball dugout design and irrigation head locations.

Very truly yours,

Harter Secrest & Emery LLP

Paul D. Sylvestri
DIRECT DIAL: 585.231.1194
EMAIL: PSYLVESTRI@HSELAW.COM

PDS:hlh
cc: T. Schneider, P.E., DEC
J. Stenerson, Esq., DEC
H. Austin, ECSD
K. Krueger, Unisys
E. Parker, Esq., Unisys
M. Murphy, Esq., B&D
P. Brookner, Geosyntec
J. Magliocca, ECSD
T. Johnson, Sterling
S. Cyr, Hunt

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 I F: (585) 226-8139
www.dec.ny.gov

Via E-mail

August 4, 2021

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

Re: Revised Amendment #2
Interim Remedial Measure #5 Work Plan
Former Sperry Remington Site – North Portion (NYSDEC #c808022)
777 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 Amendment #2 Interim Remedial Measure #5 Work Plan, Former Sperry Remington Site – North Portion #c808022", dated July 22, 2021, and **Disapprove for the following reasons**:

The submittal is incomplete/insufficient for the following:

A. **Schedule/Sequencing**

1. The Revised Amendment #2 Interim Remedial Measure #5 Work Plan, Former Sperry Remington Site – North Portion #c808022 shall be comprehensively updated, as required, to appropriately address the implementation of the Outdoor Physical Education (P.E.) Area currently being considered for placement within the North Athletic Field (NAF) area under a Short-Term Response Action (STRA). **(July 29, 2021, Elmira City School District [ECSD] Comment No. 1)**

2. Information regarding project allotted timeframes for the IRM implementation within the identified Phase I and Phase II areas, materials management (i.e., off-site soils disposal and soils re-use processing), required movement of supporting infrastructures (i.e., support trailers, haul roads, material storage areas (MSAs) etc.), and decommissioning and Site restoration are incomplete/insufficient. Update Table 8 with appropriate schedule detail and time allotment for the project activities. **(ECSD Comment No. 2)**.

B. **Additional Delineation**

3. The findings of additional Site investigations conducted to further delineate Area of Concern 19 (AOC-19) to the north and south and potential sources near MW-57, as part of Soil and Groundwater Investigation Work Plan Addendum, Northern Athletic Fields, are not included as part of the work plan or incorporated into the design of the proposed IRM Excavations and project schedule. Update the work plan text, figures, schedule, and

construction drawings as appropriate to depict the findings of this data. **(ECSD Comment No. 3.B.)**

4. Additional details and schedules associated with the Agency requested drywell verification of existing data and required supplemental soil sampling locations are incomplete. Present a figure clearly depicting the location of each existing drywell located within the NAF denoting the future status of all drywells as remaining, removal, or new installation. Provide an analytical summary table for the available analytical data for each drywell location and identify additional proposed sampling to address data gaps. Update the work plan text, figures, schedule, and construction drawings as appropriate for the drywell activities. **(ECSD Comment No. 3.A.)**

C. **Soil Cover System**

5. The top two feet of all areas where the soil cover will become the final remedy shall be sufficiently evaluated for potential human health exposure through the collection of required analytical data. Details and schedules associated with the verification of soil cover restoration for areas outside of proposed IRM excavation areas are incomplete/insufficient. Provide work plan details outlining soil verification sampling procedures and proposed sample locations.

   a. For areas outside of the IRM excavation requiring modification (i.e., irrigation and/or sod for Athletic fields), all remedial activities must be complete prior to the removal of the sod and six inches of soil. Cover system verification sampling shall occur after the removal of sod and soil is completed. Update the work plan text, figures, schedule, and construction drawings as appropriate for the areas outside of the IRM excavation.

6. Soil Cover System Backfilling

   b. Intermediate grades must be maintained until the final cover is installed to prevent dust and erosion from the site to adjacent properties. Provide additional information regarding activities that will be conducted for maintenance of the IRM areas prior to restoration.

   c. Provide the cross-section for the entire restoration area, including restoration being completed by ECSD contractors, within the appropriate figures and construction drawings. These figures and construction drawings must include the demarcation layers.

7. Figures:

   a. Revise Figures 6A to 6E with the proposed sample locations and analytes.

   b. Provide a figure with VOC surface and shallow subsurface soil quality verification sampling as presented on Table 4D.

   c. Revise Figure 6B – Soil Cover Quality Verification – Metals to include surface soil quality (0-0.17 feet) samples as presented on Table 4B.

D. **Temporary Infrastructure Use, Decommissioning, and Restoration**

8. Full decommission / restoration of the Main Street construction entrance.

9. Work plan details and project schedules for required sampling of the Temporary Infrastructure (VFW equipment wash pads, MSAs, and haul roads) between project phases and upon IRM completion and decommissioning, are not provided. Update the work plan text and schedule as appropriate for the temporary infrastructure.

10. Provide further detail within the work plan text related to the required Temporary Infrastructure decommissioning sampling. Decommissioning samples in areas used as a haul road or MSA must be collected at a sampling frequency of 1 sample per 3,600 square feet and collected below original ground surface at 0-2 inches and 2-12 inches, or at 6-12 inches if the soil will be removed in the top 6 inches. All samples will include PCBs, Metals, and 25 percent will include SVOCs, VOCS and Emerging Contaminants. If analytes are detected above restricted residential Soil Cleanup Objectives (SCOs), then soil will be removed from the affected area to a depth of (six inches), and additional documentation samples shall be collected. The footprint of the temporary infrastructure and affected areas shall be surveyed and contain a demarcation layer prior to backfilling in accordance with the final cover system requirements. A comprehensive work plan shall be provided to NYSDEC and NYSDOH for approval prior to final sampling of the Temporary Infrastructure areas.
11. Clarify the intended use and potential access to the Football Field Complex (FFC) from the existing haul road located east of the FFC during Phase I and Phase II. **(ECSD Comments No. 9.B. and 10.B.)**
12. Provide discussions and excavation shoring provisions (i.e., sheet piling, trench boxes, etc.) for Phase I excavations support proposed directly adjacent to the haul roads and implement the appropriate time allotment into the schedule for the installation and required modifications of the excavation shoring during the separate phases of the IRM for excavation areas to the east and west of the haul road.
13. Update the project schedule time allotment for the required transfer of MSA soils for off-site disposal or for re-use on-Site for the transition between Phase I and Phase II IRM excavation areas.
14. Provide a contingency plan (including proposed site location, materials management, and anticipated duration) for the potential requirement of a TSCA MSA during the Phase II IRM excavation areas.
15. For each Phase, provide additional information detailing the potential materials management and handling of the following:
    a. Heavy Metals (nickel, chromium) in soils proposed for Reuse
    b. Petroleum Impacts within 0-2 ft and at depth
    c. Protection of Groundwater (PoG) exceedances in soil at the water table
16. Provisions for a boot decontamination station within the LOE shall be implemented for foot traffic between the IRM excavation areas and trailers in order to prevent impacted soils being tracked from the excavation to the off-Site trailers (located within the VFW parking area).

E. **Former Industrial Sewer Removal of Segment 7**

17. Details and schedules associated with the exposure and removal of the former industrial sewer, which resulted in significant delays within the Football Field Complex (FFC) area, are insufficient. The former industrial sewer segment 7 enters the NAF in an area outside the proposed IRM excavation limits. Update the work plan text, figures, schedule, and construction drawings as appropriate for the Former Industrial Sewer proposed exposure and removal activities.

F. **Construction Drawings**

18. References for several Construction Drawing "Notes" contain inconsistencies, errors, or omissions. Review the Construction Drawing "Notes" for consistency, clarification, and correctness and update as required.

19. Drawing #2

    a. Existing conditions notes: Note 2 and 3 are duplicated, please correct. **(ECSD Comment No. 7C)**
    b. Limit of Disturbance (LOD) falls within Limit of Excavation (LOE). Please correct and confirm LOD encompasses the full extent of proposed excavation and site activities on all relevant drawings. **(ECSD Comment No. 4A)**
    c. Gas line located at the north and northwest area of the NAF is not shown as an existing condition or as part of the demolition plan. Please update and correct. **(ECSD Comment No. 8)**
    d. Existing Condition Note 4 states that "Temporary Facilities Constructed During IRM#4 and IRM #5 will be utilized as shown". Statement is outdated and contradicts the plan to relocate the construction entrance and trailers and material storage area to the VFW/Keefe Street as listed in the Construction Sequence on this same sheet. Please update and correct.

20. Drawing #3

    a. Truck traffic access to the B-1 excavation is not clearly defined. Please clarify how trucks will access this area for IRM Excavation. **(ECSD Comment No. 9A).**
    b. Truck traffic access to the Phase I TSCA Accumulation area is not clearly defined. Please demonstrate how TSCA offsite disposal trucks will access this area for offsite disposal of TSCA materials.
    c. IRM#5 and Phase I temporary infrastructure to remain in place is not included on the drawing. Please update the drawing to include all infrastructure that will be left in place during Phase II.

21. Drawing #4

    a. Details depicting the stabilized construction entrance and equipment wash pad are not included. See drawing #3. Please update.
    b. The non-hazardous soil stockpile area appears to overlap with the excavation footprint. Provide an explanation for how this conflict will be managed. Furthermore, this stockpile area falls outside of the "area outside of limit of excavation to be prepared for ballfield restoration" and shall require decommissioning sampling. (Drawing 22). **(ECSD Comment No. 10A)**
    c. Remove Note #8 and TSCA Accumulation Area arrow as no TSCA accumulation area is planned for Phase II.
    d. Note #9 indicates that stockpile areas shall be decommissioned at the end of Phase II and restoration shall include the removal of up to 2.5 ft of soil below final grade for areas not designated for excavation. The anticipated volume of soil generated through this additional excavation should be addressed within the schedule and denoted on the restoration plan as areas to be "excavated to 2.5 feet for temporary facility restoration".

e. Update Note #9 to remove references regarding the decommissioning of the RCRA and TSCA accumulation areas as these areas are not planned for Phase II and decommissioning shall be addressed at the end of Phase I.

22. Drawing #5
    a. Existing conditions note: Note 2 and 3 are repeated. Correct Notes.
    b. General Notes: Note 5 references the use of "Temporary TSCA Transit Roads" (Detail 24). The anticipated layout of these roads should be included as part of the phase plans (Drawings 3 and 4).
    c. Excavation contours indicate that excavation activities could encroach upon abutting properties. Please clarify if off-site work will be required and/or amend proposed excavation plan as needed. **(ECSD Comment No. 11)**

23. Drawing #6
    a. Drywells to be removed are not identified for removal as part of the demolition plan. Please update.

24. Drawing #21
    a. Notes 2, references drawing C5.5 in "Site development plans for Elmira High School" Provided by Marathon Engineering on 21 April 2021. Drawings attached as Attachment 6 are dated 23 April 2021, and do not include drawing C5.5. Please attach most recent and updated NAF restoration plans and update construction drawing citations to reference the correct NAF restoration plans as applicable. **(ECSD comment No. 16)**

25. Drawing #22
    a. Note 7. "Verification of soil cover quality shall be completed prior to completion of IRM activities and before field restoration." Provide work plan details outlining soil verification sampling procedures and proposed sample locations. (**Please refer to Comment D above)**

26. Drawing #23
    a. Drawing does not include updates to site layout including illustrating the VFW location as the haul road access. Please provide updates. **(ECSD Comment No. 17)**
    b. The legend indicates a "chain link fence" will be in place around the baseball field at the Northwest corner of the FFC. It is unclear why this is presented on the drawing, and not included on any other drawings included as part of the package. Please provide an explanation and/or update as appropriate.

Within 15 days, please elect in writing to modify the work plan within 30 days of this notice or take other actions in accordance with the consent order.

Under separate cover, please provide a response to the ECSD comments included in the "Comments to the July 20, 2021, Revised IRM #5 Work Plan, Amendment #2, Site #c808022" document provided as Attachment 1 to this comment letter.

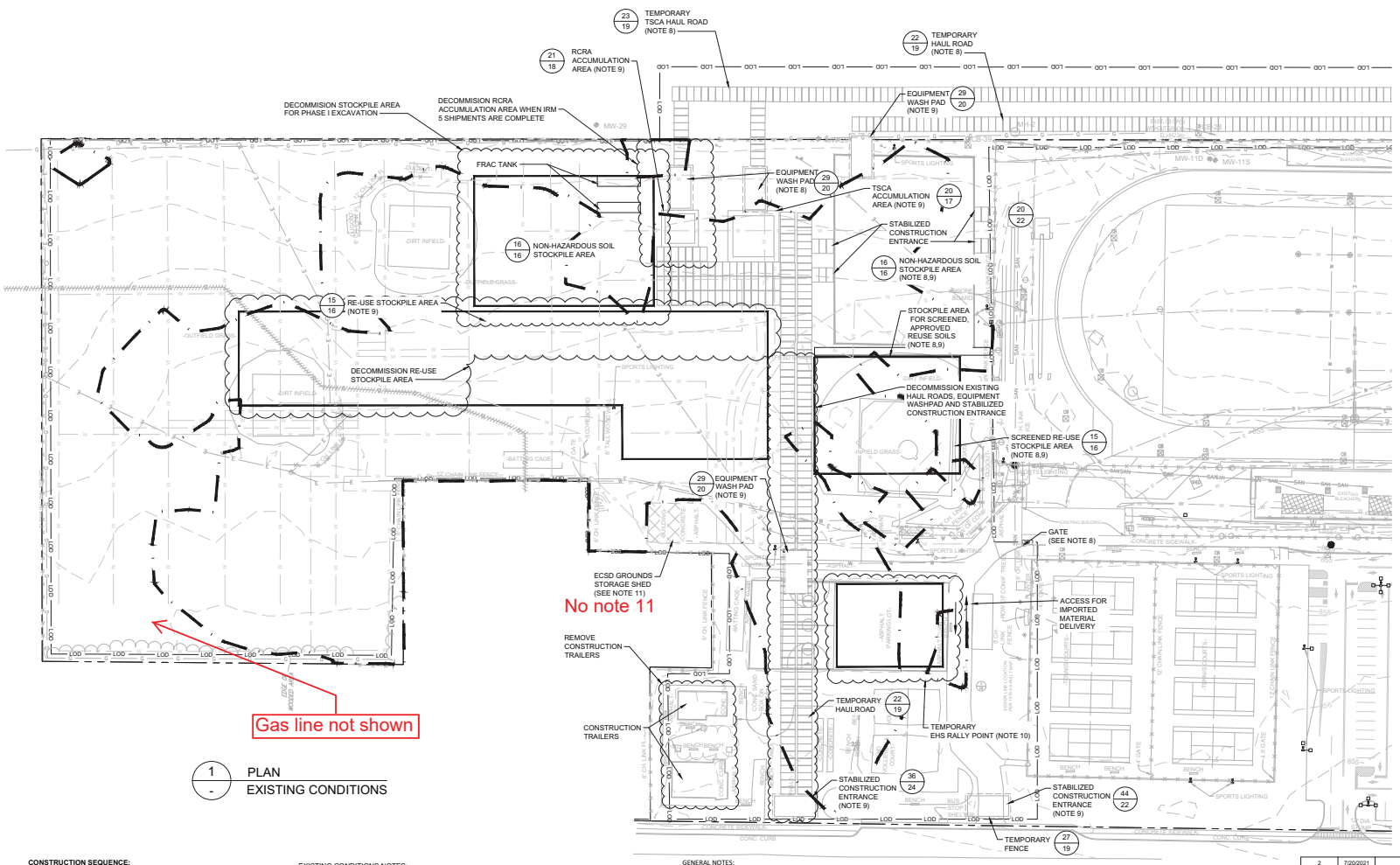
Please contact me at (585) 226-5480 if you have any questions regarding this letter.

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



LEGEND

- MANHOLE
- CATCH BASIN
- MANHOLE
- CULVERT PIPE
- CHAIN LINK FENCE
- WOODEN FENCE
- PROPERTY LINE
- EXISTING CONTOUR LINE
- EDGE OF WATER
- EDGE OF WOODS OR BRUSH
- BURIED ELECTRIC CABLE
- SANITARY SEWER
- STORM SEWER
- NATURAL GAS LINE
- DEACTIVATED GAS LINE
- WATER LINE
- BURIED FIBER OPTIC CABLE
- EXCAVATION LIMITS
- LIMIT OF DISTURBANCE
- TREE

CONSTRUCTION SEQUENCE:

1. INSTALL/MAINTAIN TEMPORARY SEDIMENT AND EROSION CONTROLS IN ACCORDANCE WITH APPROVED SWPPP.
2. DISASSEMBLE TEMPORARY RALLY POINT AFTER THE 2021-21 SCHOOL YEAR AND STORE ON-SITE FOR FUTURE USE BY ECSD. DISASSEMBLY AND STORAGE SHALL BE COORDINATED WITH ECSD.
3. DECOMMISION AND DECONSTRUCT TEMPORARY HAUL ROADS AND STOCKPILE AREAS AS SHOWN.
4. DECOMMISSION AND DECONSTRUCT RCRA ACCUMULATION AREA AFTER IRM 5 RCRA WASTE SHIPMENTS HAVE BEEN COMPLETED.
5. REMOVE CONSTRUCTION TRAILERS AND LAYDOWN AREAS.
6. DECOMMISSION AND DECONSTRUCT S MAIN ST CONSTRUCTION ENTRANCE AS SHOWN.

EXISTING CONDITIONS NOTES:

1. CONTRACTOR SHALL MAINTAIN ACCESS ECSD PERSONNEL TO GROUNDS STORAGE SHED AND CONCESSION STAND STORAGE.
2. TEMPORARY RALLY POINT SHALL BE DISASSEMBLED AFTER THE 2021-21 SCHOOL YEAR AND STORED ON-SITE FOR FUTURE USE BY ECSD. DISASSEMBLY AND STORAGE SHALL BE COORDINATED WITH ECSD.
3. TEMPORARY RALLY POINT SHALL BE DISASSEMBLED AFTER THE 2021-21 SCHOOL YEAR AND STORED ON-SITE FOR FUTURE USE BY ECSD. DISASSEMBLY AND STORAGE SHALL BE COORDINATED WITH ECSD.
4. TEMPORARY FACILITIES CONSTRUCTED DURING IRM #4 AND IRM #5 WILL BE UTILIZED AS SHOWN.
5. CONTRACTOR SHALL PROTECT EXISTING MONITORING WELLS WITHIN THE LIMIT OF DISTURBANCE DURING CONSTRUCTION AND RESTORE ACCESS DURING SITE RESTORATION.

GENERAL NOTES:

1. EXISTING TOPOGRAPHY IS FROM:
   a. A TOPOGRAPHIC SURVEY OF ELMIRA HIGH SCHOOL BY HUNT ENGINEERS, ARCHITECTS, AND SURVEYORS IN SEPTEMBER 2016. VERTICAL CONTROL IS REFERENCED TO THE NORTH AMERICAN VERTICAL DATUM OF 1988 (NAVD 88/GEOID 12A), HORIZONTAL CONTROL IS REFERENCED TO THE NORTH AMERICAN DATUM OF 1983 (NAD 83/NA 2011).
   b. A TOPOGRAPHIC SURVEY OF ELMIRA HIGH SCHOOL BY FAGAN ENGINEERS IN MAY 2019 - 18064-A SENT 2019-5-24.DWG
2. UNDERGROUND UTILITIES SHOWN WERE MAPPED USING A COMBINATIONOF OF FIELD LOCATED EVIDENCE AND EXISTING UTILITY MAPS. THE ACCURACY OF THESE UTILITY LOCATIONS CANNOT BE GUARANTEED. ALL UNDERGROUND UTILITIES SHOULD BE FIELD VERIFIED BEFORE EXCAVATING. CALL 'DIG SAFELY NEW YORK' 1-800-962-7962.
3. ALL WORK SHALL BE COMPLETED IN ACCORDANCE WITH THE APPROVED IRM WORK PLAN AND AMENDMENTS. ANY PROPOSED MODIFICATION TO THE WORK PLAN MUST BE APPROVED BY NYSDEC.
4. CONSTRUCTION TRAFFIC PATTERNS MAY BE MODIFIED BY CONTRACTOR AS NECESSARY SUBJECT TO ENGINEER APPROVAL.
5. TEMPORARY TSCA TRANSIT ROAD SHALL BE PLACED OVER NON-TSCA AREAS WHEN BRINGING SOILS WITH ≥ 50 MG/KG PCBS TO THE TSCA ACCUMULATION AREA.
6. TREES AND WOODY VEGETATION SHALL BE CUT FLUSH WITH THE GROUND SURFACE AND DISPOSED OF OFF-SITE AT A PERMITTED LAND CLEARING MANAGEMENT FACILITY. ROOT BALLS SHALL BE MANAGED IN ACCORDANCE WITH THE SOILS MANAGEMENT PLAN. STUMPS SHALL BE GROUND UP IN-PLACE AND WOOD CHIPS MANAGED WITH THE SOILS MANAGEMENT PLAN.
7. CONTRACTOR SHALL INSTALL TEMPORARY 6-FOOT TALL CHAIN LINK FENCING AROUND THE LIMITS OF CONSTRUCTION. FENCING SHALL INCLUDE VISUAL SCREENING.

CONSTRUCTION DRAWING

REV	DATE	DESCRIPTION	DRN	APP
2	7/20/2021	RESPONSE TO ECSD AND AGENCY COMMENTS		
1	5/4/2021	RESPONSE TO AGENCY COMMENTS		

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

UNISYS

TITLE: EXISTING CONDITIONS

PROJECT: INTERIM REMEDIATION MEASURE #5 AMENDMENT #2

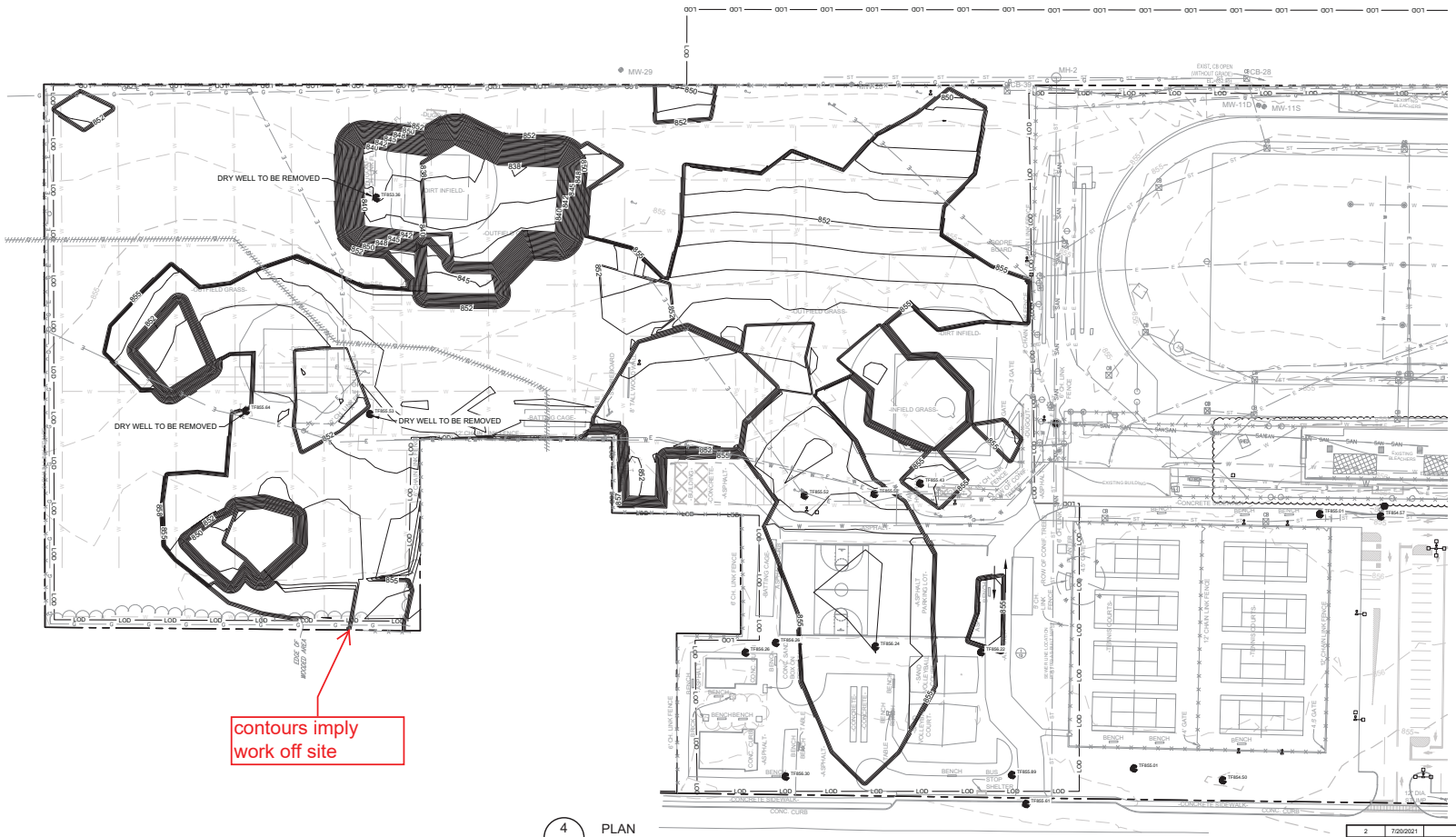
SITE: FORMER SPERRY-REMINGTON SITE - NORTH PORTION ELMIRA, NEW YORK

SIGNATURE 7/20/2021 DATE

STATE OF NEW YORK · ANDREW KIRKABRIGHT · 110995-1 · LICENSED PROFESSIONAL ENGINEER

DESIGN BY:	DG	DATE:	MARCH 2021
DRAWN BY:	AM	PROJECT NO.:	MN08321
CHECKED BY:	TBR	FILE:	MN08321-503-01
REVIEWED BY:	AK	DRAWING NO.:	2 OF 24
APPROVED BY:			

P:\cad\PROJECTS\Unisys - Elmira NY (MN08321)\MN08321 IRM\MN08321-503-01.dwg
BenKA - 7/20/2021 4:03 PM



4 / - PLAN
EXCAVATION PLAN

LEGEND

- MANHOLE
- CATCH BASIN
- MANHOLE
- CULVERT PIPE
- CHAIN LINK FENCE
- WOODEN FENCE
- PROPERTY LINE
- EXISTING CONTOUR LINE
- EDGE OF WATER
- EDGE OF WOODS OR BRUSH
- BURIED ELECTRIC CABLE
- SANITARY SEWER
- STORM SEWER
- NATURAL GAS LINE
- DEACTIVATED GAS LINE
- WATER LINE
- BURIED FIBER OPTIC CABLE
- EXCAVATION LIMITS
- LIMIT OF DISTURBANCE
- TREE
- DRY WELLS

NOTES:

1. SEE DRAWING 2 FOR GENERAL NOTES.
2. SEE SECTION 02 61 13 FOR REQUIREMENTS REGARDING EXCAVATION.
3. ALL VEHICLES LEAVING THE EXCAVATION AREA SHALL ONLY USE THE ESTABLISHED TEMPORARY ACCESS ROAD OR ROADWAY TO ENTER THE EQUIPMENT WASH PAD. WASH-DOWN OF ALL VEHICLE TIRES/UNDERCARRIAGE SHALL BE PERFORMED PRIOR TO VEHICLES LEAVING THE SITE.
4. CONFIRMATION SAMPLING AND APPROVAL TO BACKFILL SHALL BE REQUIRED PRIOR TO BACKFILLING.
5. FINAL EXCAVATIONS WILL BE SURVEYED PRIOR TO BACKFILLING. SEE SECTION 01 78 29.
6. PLACE DEMARCATION LAYER NETTING OVER BOTTOM OF EXCAVATION PRIOR TO BACKFILLING. SEE DETAIL 28 ON DRAWING 19 LOCATION AND DEPTH OF DEMARCATION LAYERS WILL BE SURVEYED PRIOR TO BACKFILLING. SEE SECTION 01 78 29.
7. ALL MATERIALS IMPORTED TO THE SITE MUST MEET THE REQUIREMENTS OF DER-10 SECTION 5.4(E) AND APPENDIX 5 FOR UNRESTRICTED USE. ALL CONFORMANCE DATA FOR IMPORTED MATERIALS MUST BE APPROVED BY NYSDEC. SEE SECTION 31 23 23.

0 50' 100'
SCALE IN FEET

CONSTRUCTION DRAWING

REV	DATE	DESCRIPTION	DRN	APP
2	7/20/2021	RESPONSE TO ECSD AND AGENCY COMMENTS		
1	5/4/2021	RESPONSE TO AGENCY COMMENTS		

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

UNISYS

TITLE: EXCAVATION PLAN

PROJECT: INTERIM REMEDIATION MEASURE #5
AMENDMENT #2

SITE: FORMER SPERRY-REMINGTON SITE - NORTH PORTION
ELMIRA, NEW YORK

SIGNATURE
7/20/2021
DATE

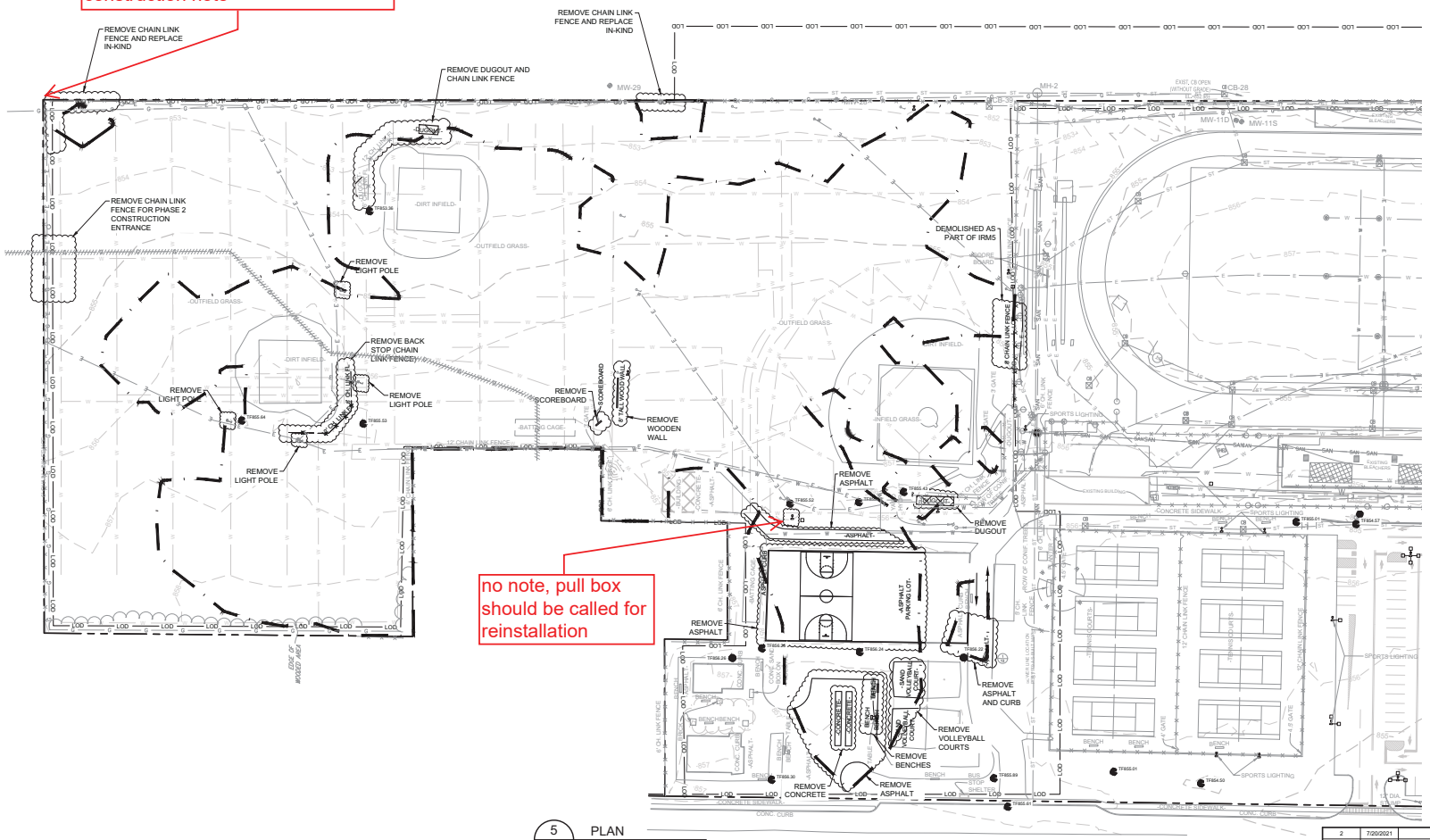
STATE OF NEW YORK · ANDREW KIRKABAMPOS · 089954-1 · LICENSED PROFESSIONAL ENGINEER

DESIGN BY:	DG	DATE:	MARCH 2021
DRAWN BY:	AM	PROJECT NO.:	MN0832I
CHECKED BY:	TBR	FILE:	MN0832I-604
REVIEWED BY:	AK	DRAWING NO.:	5 OF 24
APPROVED BY:	AK		

P:\cad\PROJECTS\Unisys - Elmira NY (MN0832I)\MN0832I PRIMER\MN0832I-604.dwg
BenKA - 7/20/2021 4:04 PM

property pin will likely be impacted, surveyor should install new pin after work is complete. often a typical construction note

no note, pull box should be called for reinstallation



5 / - PLAN DEMOLITION PLAN

LEGEND

- MANHOLE
- CATCH BASIN
- MANHOLE
- CULVERT PIPE
- CHAIN LINK FENCE
- WOODEN FENCE
- PROPERTY LINE
- EXISTING CONTOUR LINE
- EDGE OF WATER
- EDGE OF WOODS OR BRUSH
- BURIED ELECTRIC CABLE
- SANITARY SEWER
- STORM SEWER
- NATURAL GAS LINE
- DEACTIVATED GAS LINE
- WATER LINE
- BURIED FIBER OPTIC CABLE
- EXCAVATION LIMITS
- LIMIT OF DISTURBANCE
- TREE
- DRY WELLS

NOTES:

1. SEE DRAWING 2 FOR GENERAL NOTES.
2. CONTRACTOR SHALL COORDINATE WITH ECSD REGARDING STORAGE OF REMOVED ITEMS, IF REQUIRED. ITEMS THAT ARE NOT STORED SHALL BE TRANSPORTED OFFSITE FOR DISPOSAL.
3. CONTRACTOR IS RESPONSIBLE FOR LOCATING AND REMOVING THE LIGHT POLE ELECTRICAL SYSTEM WIRING WITHIN THE AREA OF EXCAVATION.
4. LOCATIONS OF REMOVED UTILITIES SHALL BE SURVEYED AND AS-BUILT INFORMATION SHALL BE PROVIDED ECSD. SEE SECTION 01 78 29.
5. CONTRACTOR IS RESPONSIBLE TO CONFIRM THAT WATER AND ELECTRIC SERVICES ARE SHUT OFF PRIOR TO REMOVAL.

0 50' 100'
SCALE IN FEET

CONSTRUCTION DRAWING

REV	DATE	DESCRIPTION	DRN	APP
2	7/20/2021	RESPONSE TO ECSD AND AGENCY COMMENTS		
1	5/4/2021	RESPONSE TO AGENCY COMMENTS		

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

UNISYS

TITLE: DEMOLITION PLAN

PROJECT: INTERIM REMEDIATION MEASURE #5 AMENDMENT #2

SITE: FORMER SPERRY-REMINGTON SITE - NORTH PORTION ELMIRA, NEW YORK

SIGNATURE
7/20/2021
DATE

STATE OF NEW YORK · ANDREW KIRKABAUGH · 095954-1 · LICENSED PROFESSIONAL ENGINEER

DESIGN BY:	DG	DATE:	MARCH 2021
DRAWN BY:	AM	PROJECT NO.:	MN08321
CHECKED BY:	TBR	FILE:	MN08321-606
REVIEWED BY:	AK	DRAWING NO.:	6 OF 24
APPROVED BY:	##		

P:\cad\PROJECTS\Elmira - Elmira NY (MN08321)\MN8321 IRM\MN08321-606.dwg
BenOA - 7/20/2021 4:04 PM

HSE
Harter Secrest & Emery LLP
ATTORNEYS AND COUNSELORS
WWW.HSELAW.COM

July 29, 2021

VIA EMAIL

Mr. Aron Krasnopoler, Ph.D., P.E.
B&B Engineers & Geologists
10211 Wincopin Circle, Floor 4
Columbia, Maryland 21044

Re: Comments to the July 20, 2021 Revised IRM #5 Work Plan, Amendment #2, Site #c808022

Dear Mr. Krasnopoler:

The Elmira City School District ("**ECSD**") submits the following comments to Amendment #2, Interim Remedial Measures #5 Work Plan for the Former Sperry Remington Site – North Portion (#c808022) dated July 20, 2021 submitted by B&B Engineers & Geologists of New York, P.C. on behalf of Unisys Corporation ("**Unisys**") ("**IRM #5WP, A2**")[1]. The following comments and questions are being provided directly to Unisys with a copy to NYSDEC and are presented based upon a specific topic and/or drawing, as appropriate. Several of the below comments are also paired with call out boxes added to the relevant drawings attached to this letter.

1. **General Comment**

   As both Unisys and the New York State Department of Environmental Conservation ("**NYSDEC**") are aware, the parties are working on a plan to provide for temporary use of a portion of the North Athletic Fields ("**NAF**") by Elmira High School for the upcoming school year that is generally located where the future discus/shot put area will be installed. The final outcome of that plan will likely require revisions to IRM #5WP, A2 geared toward coordinating the two activities that, for example only and without limitation, could take the form of providing buffer zones, change construction sequencing, or involve the reuse of certain materials. The comments presented below do not reflect the potential for such revisions.

2. **Schedule/Sequence**

   A. The schedule indicates an approximately 9 week duration for both phases of remediation. There appears to be no accounting for any unknowns in this

[1] A complete copy of IRM #5WP, A2 that included figures was not provided until July 22, 2021.

1600 BAUSCH & LOMB PLACE ROCHESTER, NY 14604-2711 PHONE: 585.232.6500 FAX: 585.232.2152
ROCHESTER, NY • BUFFALO, NY • ALBANY, NY • CORNING, NY • NEW YORK, NY

schedule. Based on previous experience, this would seem to be a mistake in project planning.

B. The work plan text refers to Table 8 for schedule. However, Table 8 has minimal information related to construction activities for work associated with this submission. For example, there is no description of construction durations for Phase I and Phase II to allow for evaluation of potential impacts of remediation on ECSD access to the Football Field Complex. See Comments 9.B. and 10.B.

C. The NAF restoration schedule is vague and confusing as written in the work plan text. Table 8 indicates restoration work to occur between October and February (weather dependent). Given the type of work associated with restoration (trenching for irrigation, sodding, seeding, etc.), it is highly unlikely that this work will be able to occur during this time frame. Seeding and sodding this late in fall and/or early winter puts survival at risk. See Comment 20.B. It is far more likely that this work will not be able to occur until spring 2022. A more realistic and detailed schedule should be presented.

3. **Additional Delineation**

A. Additional delineation is needed west of boring B3073 and generally around the existing storage building. Note that NYSDEC previously commented that delineation was needed west of boring B3073 and that comment does not appear to have been addressed.

B. Unisys uses generic statements in several places that the work plan will be updated based on results of ongoing additional delineation (see pages 3, 5, 6, 8, 9) but it is unclear reviewing the schedule and sequence of operations how additional delineation fits into excavation activities. The schedule in Table 8 includes a 0 day line item to update design to incorporate Predesign Investigation Data ("**PID**"). The milestones set forth in the work plan text references folding dry well data into excavation work plans but there is a need to fold other PID into those plans. See Comment 3.C. below.

C. NYSDEC previously provided comments via letter dated March 20, 2021 at pp. 2 and 3 (see Attachment 1 to IRM #5WP, A2) on the IRM #5WP, A2 that identified data gaps in the step outs for excavation delineation. Based on ECSD's review of the current revision, ECSD is not confident that NYSDEC's comments have been addressed and data gaps appear to remain. For example. B3619 at 2-4 feet still requires additional vertical IRM excavation delineation based on the PCB results. Each and every one of NYSDEC's comments should be checked against this revised work plan to be sure excavation limits have been properly defined to minimize the need for step outs and step downs. Additional delineation should then occur as necessary and as previously directed by NYSDEC.

4. **Limits of Disturbance**

   A. On a number of construction drawings, the "limit of disturbance" line is shown crossing through excavation areas in places and should be corrected for clarity.

   B. Please include an explanation and data in the work plan text on how the south and northeast limits of the proposed excavation for AOC-19 on Figure 3I are determined. Note that ECSD previously provided this comment on prior drafts and it has yet to be addressed.

5. **Work Plan Text**

   The following comments were previously provided by ECSD and do not appear to have been addressed:

   A. Page 14, please revise sentence: *Stockpiles with observed bricks, concrete, or other inert materials will be evaluated for use in structural backfill* in consultation with ECSD.

   B. Page 16: Based on experience with previous IRM's, ECSD recommends the following revision to the third bullet point under the "Estimated Truck Traffic" section to reflect the maximum number (XX) of trucks allowed per day on-Site. It is ECSD's recollection that the number of trucks allowed was increased from 22 to around 30 or more trucks allowed was increased from 22 to around 30 or more trucks. ~~It is unlikely that~~ if excavation and backfilling operations are ~~will be~~ concurrent, ~~so~~ truck traffic to and from the MSA may be as much as XX ~~will not exceed 22~~ loads per day.

6. **Light Poles**

   All construction drawing sheets still show both light pole locations at the baseball field i.e., lights that were removed previously and lights that are currently at the field. Only existing light poles should be shown.

7. **Notes on Construction Drawings / Grounds Storage Shed**

   References to "Notes" on the first several sheets of the Construction Drawings (##2, 3) are either inaccurate, missing or confusing. For example, Sheet #2 does not have notes referenced on that page. Are they referring to the notes on Sheet 3?

   A. Sheet 2: missing note 11 related to the grounds storage shed. Is it intended to be Note 7 on Sheet 3? If so, it appears to be an incorrect reference. What work is slated related to the grounds storage shed?

B. Sheet 3: grounds storage shed also has note 11 with incorrect reference. Should it be Note 7?

C. Existing Condition Notes 2 & 3 are the same.

D. Existing Condition Note 4 indicates that Temporary facilities installed in IRM 4 & 5 shall be reused as shown. This contradicts the plan to relocate construction entrance and trailers and material storage areas to VFW / Keefe Street as listed in the Construction Sequence on this same sheet.

8. **Existing Gas Line (Construction Drawing, Sheet #2)**

The gas line located at the north and northwest area of the NAF is not shown as an existing condition. See call out box added to drawing.

9. **Haul Road (Construction Drawing, Sheet #3)**

A. It is unclear how truck traffic is to access the B-1 excavation area as Haul Road pathways do not extend to this area.

B. Are there plans to utilize the haul roads east of the Football Field Complex ("**FFC**")? The connection between Phase 1 haul roads and these existing haul roads has been removed as part of this submission. In addition the existing haul roads east of the FFC do not appear on the Phase 2 plans on sheet 4.

10. **Phase 2 Work/FFC Access (Construction Drawing, Sheet #4)**

A. Reuse stockpile area appears to overlap with the excavation footprint. How will this conflict be managed?

B. There have been discussions regarding ECSD access to FFC via VFW / Keefe street access to allow for construction of the temporary physical education space. This would appear impossible during Phase 2 excavation. There is also no description of construction durations for Phase 1 or 2 to allow for evaluation of potential impacts of remediation on ECSD access to FFC. Will the haul road along the railroad right of way remain? If so, that may provide an opportunity to allow trucks to the FFC to drive past Phase 2 excavations and use that right of way to get to the FFC. **In any event, the ability for ECSD to access the FFC through this area to allow for completion of the capital improvement project is of great importance and needs to be incorporated into remediation planning/sequencing**.

C. See Comment 9.B. above.

11. **Off-Site Work (Construction Drawing, Sheets ##5 and 9)**

    Based on contours it appears that some work will be needed off-site. What is the plan for excavations that may or should extend off-site? Alternatively, how will off-site properties be protected? This question has been raised before by ECSD. See call out box added to Sheet 5.

12. **Property Boundary Pin (Construction Drawing, Sheet #6)**

    A property boundary pin located at the northeast corner of the property will likely be impacted. A note stating that it should be reinstalled should be added. This may require a recertified survey boundary map. The contractor responsible for surveying it should provide a proper proposal to do so that is reviewed by ECSD. See call out box added to Sheet #6.

13. **Curbing (Construction Drawing, Sheet #6)**

    At basketball / ice rink asphalt existing curb is noted but not called out to be removed. Only pavement is called for removal. Revise note to include removal of curb as well.

14. **NAF Light Poles (Construction Drawing, Sheets ## 6, 7)**

    A. Note 3 references removal of existing light pole electrical system. There are several light pole systems on this site and it is unclear which is being referenced in this note. Should be revised for clarity so correct system is removed.

    B. No note related to baseball field light pole, has rev cloud. Note should include pull box reinstall.

15. **Pull Box (Construction Drawing, Sheet #6)**

    A note should be added to the demolition plan calling for the pull box to be reinstalled. See call out box added to Sheet #6.

16. **Reference to Restoration Grading Plan (Construction Drawing, Sheet #22)**

    Note 2 references Marathon grading plan drawing dated April 29, 2021. Most recent submission set includes revised Marathon grading drawing dated 7/20/21. Verify that Sheet 22 is referencing the most current grading plans for consistency.

17. **Haul Road Location (Construction Drawing, Sheet #23)**

    Haul road shown in current location. Should show the VFW location instead.

18. **Irrigation (Marathon Drawing, Sheet 1)**

Irrigation Note 3 indicates Restoration Contractor is responsible for all excavation for the irrigation system. Remediation Drawing sheet 22, Note 5 and detail 33 indicate Remediation Contractor shall install trenches for the irrigation system. Coordinate scope and responsibilities between drawing sets.

19. **"Owner"/Unisys (Marathon Drawing, Sheet 1)**

Soil Remediation Note 4 references "Owner's" Remediation Contractor. The use of the term "Owner" in this set of documents should be minimized to reduce confusion as ECSD is not the "Owner" in Remediation terms. "Owner" should be changed to "Unisys".

20. **New Grass/Turf Areas (Marathon Drawing, Notes Sheet #1 of 2)**

A. Restoration and Landscaping Note 1 ("**Warrantee**") reads as though ECSD will mow and water after installation. ECSD is not going to mow and water immediately, only after grass/sod is established and handed over to ECSD. Notes later in this section appear to read correctly. Please revise note 1 under this section accordingly. Also, please change "warrantee" to "warranty".

B. Sod and seeding will need a 60 **growing day** maintenance and warrantee. Growing days are between April 15 to November 15. If non-growing days should intercede because of when sod/seed is placed, the warrantee period needs to be extended appropriately.

C. ECSD highly recommends a topsoil source be identified and approved now, well in advance of when it is needed to avoid timing issues.

21. **Kick/Practice Wall (Marathon Drawing, Sheet #4)**

Relocated kick wall not shown. ECSD has shared preferred location with Unisys.

22. **Sod (Marathon Drawing, Sheet #7)**

It should be noted that the areas of sod versus seed are still subject to discussion between Unisys and ECSD at this time. From a remedial standpoint, ECSD understands that either should be acceptable to NYSDEC as part of a cover system. The areas of sod versus seed are subject to change and, if they do change, a revised drawing/plan will be submitted or the change will be reflected in the construction completion report.

23. **Baseball Field Grades (Marathon Drawing, Sheet #10)**

    Grading as shown in area of left field for baseball will cause ponding and be extremely difficult to construct. Either the baseball infield needs to be raised or the finished grade needs to be lowered at the foul post.

24. **Irrigation System Booster Pump**

    There is no information in the drawings concerning providing a new booster pump for the irrigation system. A note needs to be added that either states a new booster pump will be provided to accommodate the new system or that Unisys will determine whether the existing pump can accommodate the new system and, if not, Unisys shall provide a new booster pump to do so.

25. **Backstop/Fencing (Marathon Drawing, Sheet #13)**

    The District previously noted that new fencing should be coated black. Notes on this sheet indicate galvanized finish. Please revise.

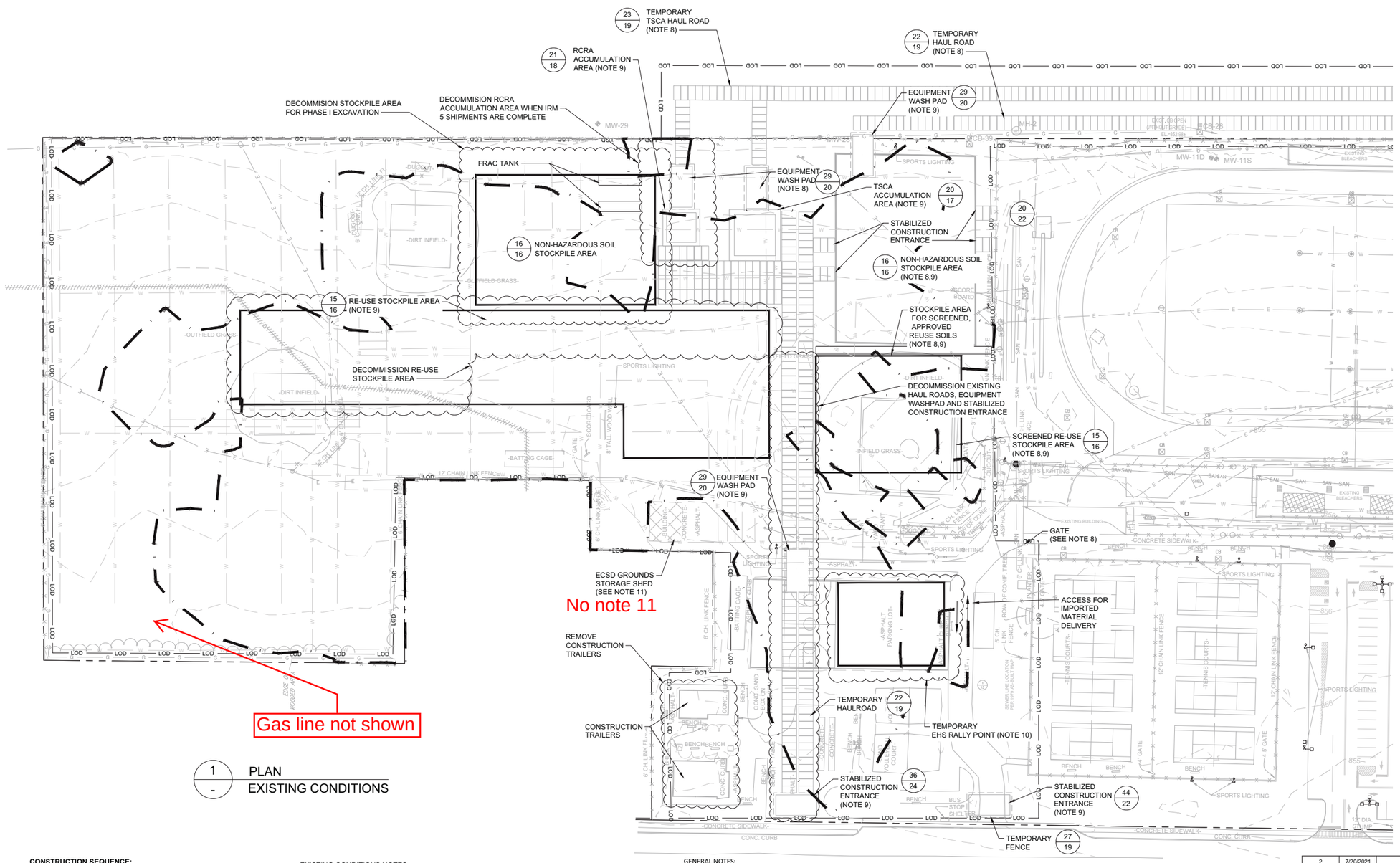
ECSD looks forward to resolving these remaining issues concerning he complete, revised IRM #5 WP, A2 with Unisys and NYSDEC.

Very truly yours,

Harter Secrest & Emery LLP

Paul D. Sylvestri
DIRECT DIAL: 585.231.1194
EMAIL: PSYLVESTRI@HSELAW.COM

PDS:hlh
cc: T. Schneider, P.E., DEC
J. Stenerson, Esq., DEC
H. Austin, ECSD
K. Krueger, Unisys
E. Parker, Esq., Unisys
M. Murphy, Esq., B&D
P. Brookner, Geosyntec
J. Magliocca, ECSD
T. Johnson, Sterling
S. Cyr, Hunt



1 / - PLAN EXISTING CONDITIONS

LEGEND

- MANHOLE
- CATCH BASIN
- MANHOLE
- CULVERT PIPE
- CHAIN LINK FENCE
- WOODEN FENCE
- PROPERTY LINE
- EXISTING CONTOUR LINE
- EDGE OF WATER
- EDGE OF WOODS OR BRUSH
- BURIED ELECTRIC CABLE
- SANITARY SEWER
- STORM SEWER
- NATURAL GAS LINE
- DEACTIVATED GAS LINE
- WATER LINE
- BURIED FIBER OPTIC CABLE
- EXCAVATION LIMITS
- LIMIT OF DISTURBANCE
- TREE

CONSTRUCTION SEQUENCE:

1. INSTALL/MAINTAIN TEMPORARY SEDIMENT AND EROSION CONTROLS IN ACCORDANCE WITH APPROVED SWPPP.
2. DISASSEMBLE TEMPORARY RALLY POINT AFTER THE 2021-21 SCHOOL YEAR AND STORE ON-SITE FOR FUTURE USE BY ECSD. DISASSEMBLY AND STORAGE SHALL BE COORDINATED WITH ECSD.
3. DECOMMISION AND DECONSTRUCT TEMPORARY HAUL ROADS AND STOCKPILE AREAS AS SHOWN.
4. DECOMMISSION AND DECONSTRUCT RCRA ACCUMULATION AREA AFTER IRM 5 RCRA WASTE SHIPMENTS HAVE BEEN COMPLETED.
5. REMOVE CONSTRUCTION TRAILERS AND LAYDOWN AREAS.
6. DECOMMISSION AND DECONSTRUCT S MAIN ST CONSTRUCTION ENTRANCE AS SHOWN.

EXISTING CONDITIONS NOTES:

1. CONTRACTOR SHALL MAINTAIN ACCESS ECSD PERSONNEL TO GROUNDS STORAGE SHED AND CONCESSION STAND STORAGE.
2. TEMPORARY RALLY POINT SHALL BE DISASSEMBLED AFTER THE 2021-21 SCHOOL YEAR AND STORED ON-SITE FOR FUTURE USE BY ECSD. DISASSEMBLY AND STORAGE SHALL BE COORDINATED WITH ECSD.
3. TEMPORARY RALLY POINT SHALL BE DISASSEMBLED AFTER THE 2021-21 SCHOOL YEAR AND STORED ON-SITE FOR FUTURE USE BY ECSD. DISASSEMBLY AND STORAGE SHALL BE COORDINATED WITH ECSD.
4. TEMPORARY FACILITIES CONSTRUCTED DURING IRM #4 AND IRM #5 WILL BE UTILIZED AS SHOWN.
5. CONTRACTOR SHALL PROTECT EXISTING MONITORING WELLS WITHIN THE LIMIT OF DISTURBANCE DURING CONSTRUCTION AND RESTORE ACCESS DURING SITE RESTORATION.

GENERAL NOTES:

1. EXISTING TOPOGRAPHY IS FROM:
   a. A TOPOGRAPHIC SURVEY OF ELMIRA HIGH SCHOOL BY HUNT ENGINEERS, ARCHITECTS, AND SURVEYORS IN SEPTEMBER 2016. VERTICAL CONTROL IS REFERENCED TO THE NORTH AMERICAN VERTICAL DATUM OF 1988 (NAVD 88/GEOID 12A), HORIZONTAL CONTROL IS REFERENCED TO THE NORTH AMERICAN DATUM OF 1983 (NAD 83/NA 2011).
   b. A TOPOGRAPHIC SURVEY OF ELMIRA HIGH SCHOOL BY FAGAN ENGINEERS IN MAY 2019 - 18064-A SENT 2019-5-24.DWG
2. UNDERGROUND UTILITIES SHOWN WERE MAPPED USING A COMBINATIONOF OF FIELD LOCATED EVIDENCE AND EXISTING UTILITY MAPS. THE ACCURACY OF THESE UTILITY LOCATIONS CANNOT BE GUARANTEED. ALL UNDERGROUND UTILITIES SHOULD BE FIELD VERIFIED BEFORE EXCAVATING. CALL 'DIG SAFELY NEW YORK' 1-800-962-7962.
3. ALL WORK SHALL BE COMPLETED IN ACCORDANCE WITH THE APPROVED IRM WORK PLAN AND AMENDMENTS. ANY PROPOSED MODIFICATION TO THE WORK PLAN MUST BE APPROVED BY NYSDEC.
4. CONSTRUCTION TRAFFIC PATTERNS MAY BE MODIFIED BY CONTRACTOR AS NECESSARY SUBJECT TO ENGINEER APPROVAL.
5. TEMPORARY TSCA TRANSIT ROAD SHALL BE PLACED OVER NON-TSCA AREAS WHEN BRINGING SOILS WITH ≥ 5O MG/KG PCBS TO THE TSCA ACCUMULATION AREA.
6. TREES AND WOODY VEGETATION SHALL BE CUT FLUSH WITH THE GROUND SURFACE AND DISPOSED OF OFF-SITE AT A PERMITTED LAND CLEARING MANAGEMENT FACILITY. ROOT BALLS SHALL BE MANAGED IN ACCORDANCE WITH THE SOILS MANAGEMENT PLAN. STUMPS SHALL BE GROUND UP IN-PLACE AND WOOD CHIPS MANAGED WITH THE SOILS MANAGEMENT PLAN.
7. CONTRACTOR SHALL INSTALL TEMPORARY 6-FOOT TALL CHAIN LINK FENCING AROUND THE LIMITS OF CONSTRUCTION. FENCING SHALL INCLUDE VISUAL SCREENING.

CONSTRUCTION DRAWING

REV	DATE	DESCRIPTION	DRN	APP
2	7/20/2021	RESPONSE TO ECSD AND AGENCY COMMENTS		
1	5/4/2021	RESPONSE TO AGENCY COMMENTS		

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

UNISYS

TITLE: EXISTING CONDITIONS

PROJECT: INTERIM REMEDIATION MEASURE #5 AMENDMENT #2

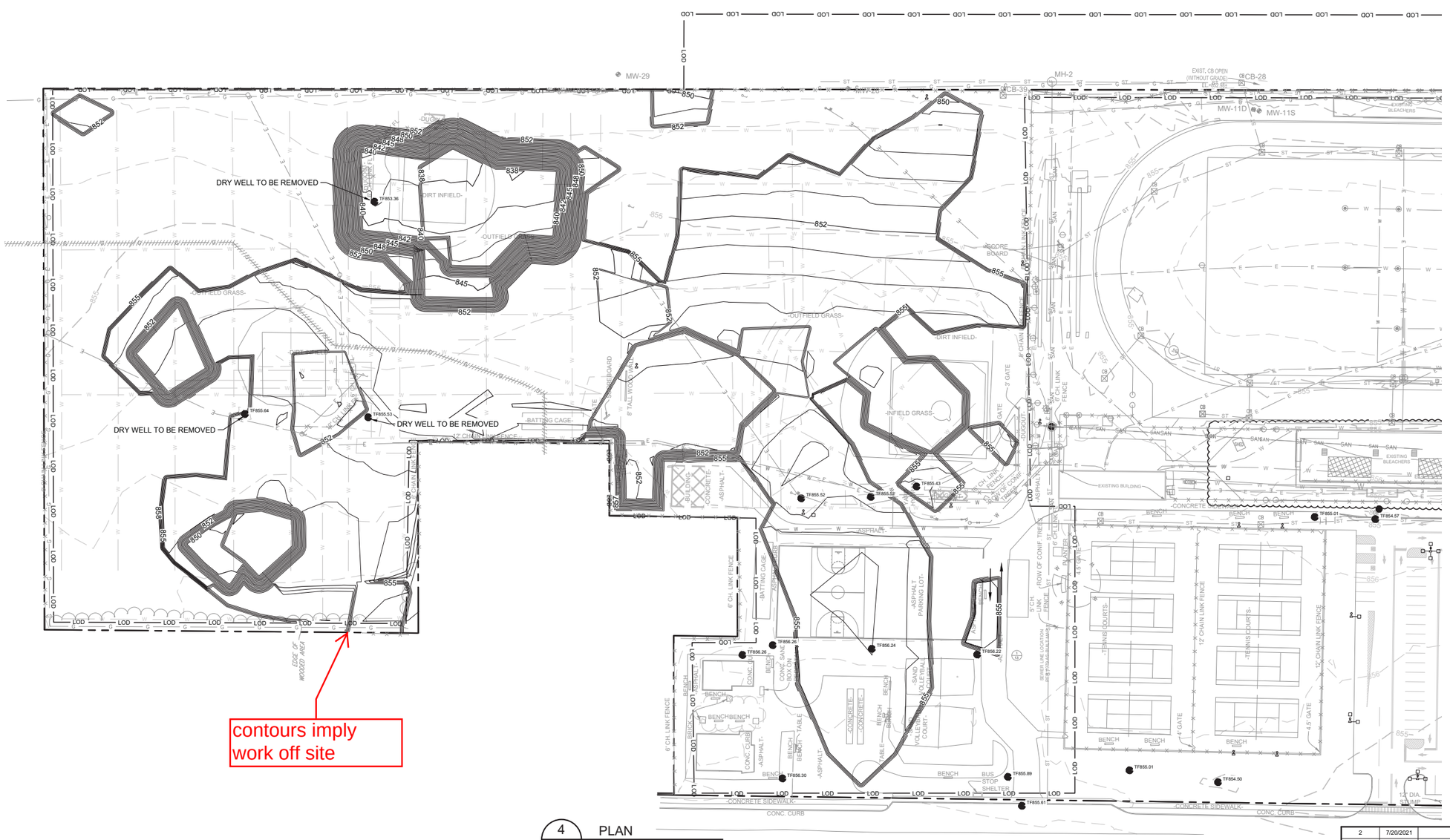
SITE: FORMER SPERRY-REMINGTON SITE - NORTH PORTION ELMIRA, NEW YORK

SIGNATURE 7/20/2021 DATE

STATE OF NEW YORK — ANDRA KRASNOPOLSKY — 089954-1 — LICENSED PROFESSIONAL ENGINEER

DESIGN BY:	DG	DATE:	MARCH 2021
DRAWN BY:	AM	PROJECT NO.:	MN0832I
CHECKED BY:	TBR	FILE:	MN0832I-503-01
REVIEWED BY:	AK	DRAWING NO.:	2 OF 24
APPROVED BY:			

P:\cad\PROJECTS\E\Unisys - Elmira NY (MN0832D)\MN0832 IRM#5\MN0832I-503-01.dwg
bfarrick - 7/20/2021 4:03 PM



4 PLAN
- EXCAVATION PLAN

LEGEND

	MANHOLE
	CATCH BASIN
	MANHOLE
	CULVERT PIPE
	CHAIN LINK FENCE
	WOODEN FENCE
	PROPERTY LINE
	EXISTING CONTOUR LINE
	EDGE OF WATER
	EDGE OF WOODS OR BRUSH
	BURIED ELECTRIC CABLE
	SANITARY SEWER
	STORM SEWER
	NATURAL GAS LINE
	DEACTIVATED GAS LINE
	WATER LINE
	BURIED FIBER OPTIC CABLE
	EXCAVATION LIMITS
	LIMIT OF DISTURBANCE
	TREE
	DRY WELLS

NOTES:

1. SEE DRAWING 2 FOR GENERAL NOTES.
2. SEE SECTION 02 61 13 FOR REQUIREMENTS REGARDING EXCAVATION.
3. ALL VEHICLES LEAVING THE EXCAVATION AREA SHALL ONLY USE THE ESTABLISHED TEMPORARY ACCESS ROAD OR ROADWAY TO ENTER THE EQUIPMENT WASH PAD. WASH-DOWN OF ALL VEHICLE TIRES/UNDERCARRIAGE SHALL BE PERFORMED PRIOR TO VEHICLES LEAVING THE SITE.
4. CONFIRMATION SAMPLING AND APPROVAL TO BACKFILL SHALL BE REQUIRED PRIOR TO BACKFILLING.
5. FINAL EXCAVATIONS WILL BE SURVEYED PRIOR TO BACKFILLING. SEE SECTION 01 78 29.
6. PLACE DEMARCATION LAYER NETTING OVER BOTTOM OF EXCAVATION PRIOR TO BACKFILLING. SEE DETAIL 28 ON DRAWING 19 LOCATION AND DEPTH OF DEMARCATION LAYERS WILL BE SURVEYED PRIOR TO BACKFILLING. SEE SECTION 01 78 29.
7. ALL MATERIALS IMPORTED TO THE SITE MUST MEET THE REQUIREMENTS OF DER-10 SECTION 5.4(E) AND APPENDIX 5 FOR UNRESTRICTED USE. ALL CONFORMANCE DATA FOR IMPORTED MATERIALS MUST BE APPROVED BY NYSDEC. SEE SECTION 31 23 23.

0 50' 100'
SCALE IN FEET

CONSTRUCTION DRAWING

REV	DATE	DESCRIPTION	DRN	APP
2	7/20/2021	RESPONSE TO ECSD AND AGENCY COMMENTS		
1	5/4/2021	RESPONSE TO AGENCY COMMENTS		

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

UNISYS

TITLE: EXCAVATION PLAN

PROJECT: INTERIM REMEDIATION MEASURE #5
AMENDMENT #2

SITE: FORMER SPERRY-REMINGTON SITE - NORTH PORTION
ELMIRA, NEW YORK

SIGNATURE
7/20/2021
DATE

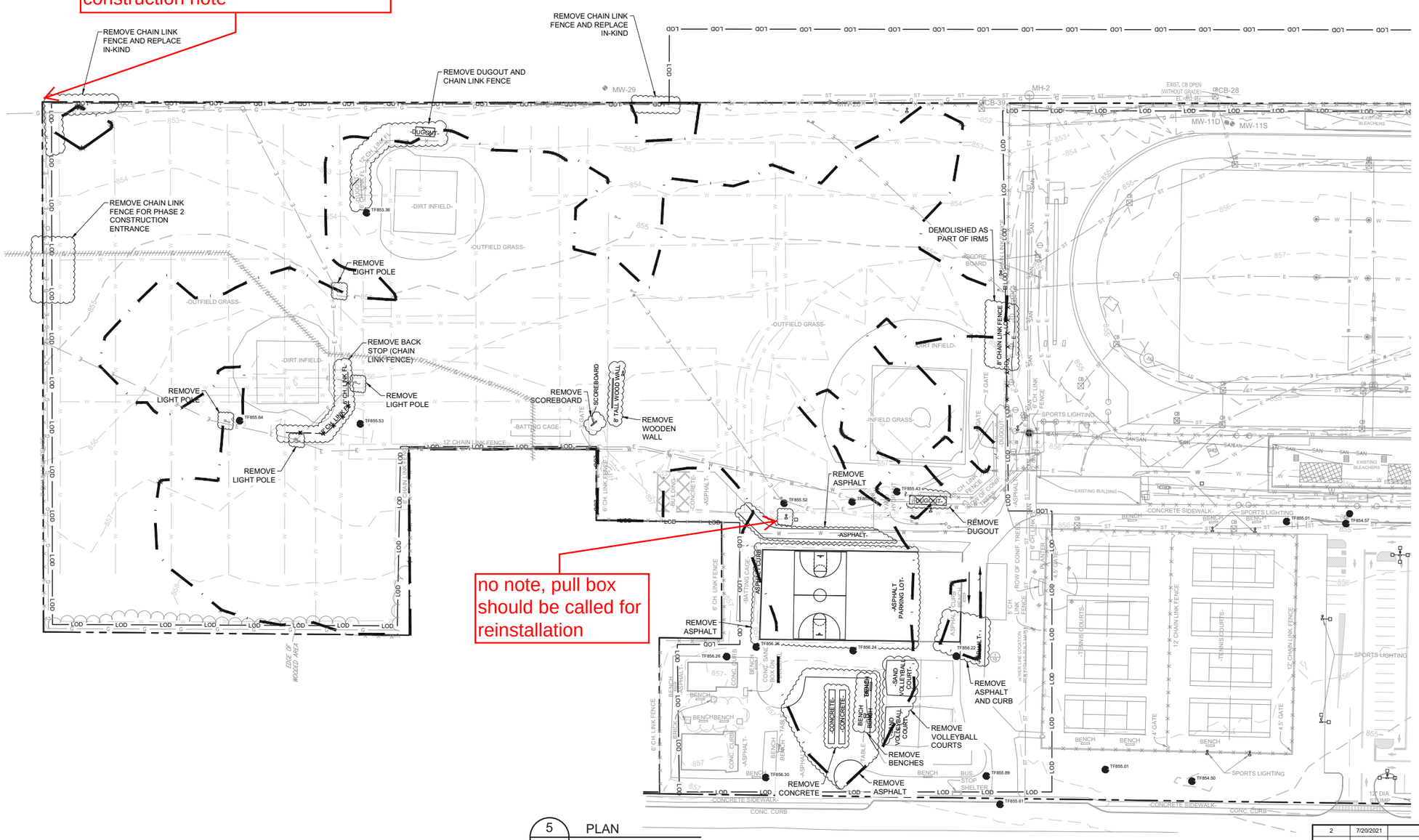
STATE OF NEW YORK · ANJA KRASHOPLER · 089954-1 · LICENSED PROFESSIONAL ENGINEER

DESIGN BY:	DG	DATE:	MARCH 2021
DRAWN BY:	AM	PROJECT NO.:	MN0832I
CHECKED BY:	TBR	FILE:	MN0832I-604
REVIEWED BY:	AK	DRAWING NO.:	5 OF 24
APPROVED BY:	AK		

P:\cad\PROJECTS\E\Unisys - Elmira NY (MN0832D)\MN0832I\RM#6\MN0832I-604.dwg
bterrick - 7/20/2021 1:04 PM

property pin will likely be impacted, surveyor should install new pin after work is complete. often a typical construction note

no note, pull box should be called for reinstallation



5 PLAN
- DEMOLITION PLAN

LEGEND

	MANHOLE
	CATCH BASIN
	MANHOLE
	CULVERT PIPE
	CHAIN LINK FENCE
	WOODEN FENCE
	PROPERTY LINE
	EXISTING CONTOUR LINE
	EDGE OF WATER
	EDGE OF WOODS OR BRUSH
	BURIED ELECTRIC CABLE
	SANITARY SEWER
	STORM SEWER
	NATURAL GAS LINE
	DEACTIVATED GAS LINE
	WATER LINE
	BURIED FIBER OPTIC CABLE
	EXCAVATION LIMITS
	LIMIT OF DISTURBANCE
	TREE
	DRY WELLS

NOTES:

1. SEE DRAWING 2 FOR GENERAL NOTES.
2. CONTRACTOR SHALL COORDINATE WITH ECSD REGARDING STORAGE OF REMOVED ITEMS, IF REQUIRED. ITEMS THAT ARE NOT STORED SHALL BE TRANSPORTED OFFSITE FOR DISPOSAL.
3. CONTRACTOR IS RESPONSIBLE FOR LOCATING AND REMOVING THE LIGHT POLE ELECTRICAL SYSTEM WIRING WITHIN THE AREA OF EXCAVATION.
4. LOCATIONS OF REMOVED UTILITIES SHALL BE SURVEYED AND AS-BUILT INFORMATION SHALL BE PROVIDED ECSD. SEE SECTION 01 78 29.
5. CONTRACTOR IS RESPONSIBLE TO CONFIRM THAT WATER AND ELECTRIC SERVICES ARE SHUT OFF PRIOR TO REMOVAL.

0 50' 100'
SCALE IN FEET

CONSTRUCTION DRAWING

REV	DATE	DESCRIPTION	DRN	APP
2	7/20/2021	RESPONSE TO ECSD AND AGENCY COMMENTS		
1	5/4/2021	RESPONSE TO AGENCY COMMENTS		

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

UNISYS

TITLE: DEMOLITION PLAN

PROJECT: INTERIM REMEDIATION MEASURE #5
AMENDMENT #2

SITE: FORMER SPERRY-REMINGTON SITE - NORTH PORTION
ELMIRA, NEW YORK

SIGNATURE
7/20/2021
DATE

STATE OF NEW YORK · ARON A. KRASNOCKER · 089954-1 · LICENSED PROFESSIONAL ENGINEER

DESIGN BY:	DG	DATE:	MARCH 2021
DRAWN BY:	AM	PROJECT NO.:	MN0832I
CHECKED BY:	TBR	FILE:	MN0832I-606
REVIEWED BY:	AK	DRAWING NO.:	6 OF 24
APPROVED BY:	##		

P:\cad\PROJECTS\E\Unisys - Elmira NY (MN0832D)\MN0832 IRM6\MN0832I-606.dwg
tfernick - 7/20/2021 4:04 PM

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 I F: (585) 226-8139
www.dec.ny.gov

Via E-mail

September 21, 2021

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

Re: Revised Amendment #2
Interim Remedial Measure #5 Work Plan
Former Sperry Remington Site – North Portion (NYSDEC #c808022)
777 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 Amendment #2 Interim Remedial Measure #5 Work Plan, Former Sperry Remington Site – North Portion #c808022", dated September 3, 2021, and **disapprove for the following reasons:**

The submittal is incomplete/insufficient for the following:

A. General

1. A revised work plan including additional information and requested work plan text, figure, schedule, and drawing updates addressed within this letter must be submitted to the NYSDEC and NYSDOH for approval prior to implementation of this work.

2. To gain Agency approval and authorization to proceed please conduct internal quality control review prior to resubmission, to ensure consistency between the corresponding work plan text, figures, and drawings.

B. Haul Roads and MSAs

3. The anticipated layout of the Haul Roads (Main and temporary transit) and MSAs for all IRM Phases shall be included as part of the phase plans (Drawings 3 and 4).

4. It is anticipated that the existing TSCA MSA will be required during Phase 2 for the exposure and removal of the former industrial sewer (FIS). During IRM#5, FIS structures encountered were consistently impacted by TSCA level waste. Therefore, all FIS encountered during IRM#5A2 will require TSCA level material handling and

management. The existing TSCA MSA shall be employed during initial Phase 2 activities to ensure the proper handling and disposal of TSCA level materials associated with the FIS. If the FIS or additional TSCA material are located after the decommissioning of the existing TSCA MSA, the proposed TSCA MSA shown on Drawing 4 shall be constructed per design requirements.

5. As discussed, during the September 14, 2021, project call regarding the IRM 5, Amendment #2 materials management and the subsequent follow up Geosyntec September 15, 2021, email, the following material management shall be implemented during the IRM 5, Amendment#2 activities:

   a. Temporary Transit Roads

      1) Uncovered off road haul trucks transporting TSCA, non-hazardous, and/or approved reuse material will not use the main temporary haul road to be used by waste shipment trucks and ECSD's contractor.

      2) TSCA and/or non-hazardous trucks will use temporary transit roads to traverse the excavation area for transportation of the excavated soils to the stockpile areas. The temporary transit roads shall be discussed within the work plan text and noted as applicable on the figures and construction drawings as applicable.

      3) Temporary transit roads will be constructed using geotextile fabric. Composite mats will be placed on top of the geotextile as needed based on field conditions.

      4) The TSCA and/or non-hazardous temporary transit roads will be modified as necessary as Phase 1 and Phase 2 excavations progress. Modifications to these areas will require notification prior to change in use.

      5) Use of temporary transit roads in areas not to be excavated or in areas of completed excavation and backfill, will be properly documented (i.e., GPS coordinates surveyed and locations depiction on Site figures as applicable) to ensure that the areas are restored as part of temporary infrastructure decommissioning (see Comment B. Haul Roads and MSAs #8 - Temporary Infrastructure Decommissioning below).

      6) Daily Field Records submitted to the Agency shall document ongoing site conditions to memorialize locations of temporary haul roads and IRM temporary infrastructure.

   b. Decontamination/Truck Wash at FFC

      1) All vehicles shall require decontamination upon exiting IRM 5, Amendment#2 contaminant zone and entering the FFC complex. Geosyntec shall provide decontamination facilities for ECSD equipment traversing the active IRM haul roads.

      2) The decontamination pad required to be installed between the IRM 5, Amendment#2 and the FFC areas shall be illustrated and described as applicable within the work plan, figures and drawings.

   c. Temporary Infrastructure Decommissioning

1) Decommission samples must be collected in all areas (current and proposed) used as temporary infrastructure (temporary transit roads, IRM haul roads, MSAs, etc.) upon completion of IRM 5, Amendment#2 excavation and backfill and prior to Site restoration.

2) Decommission samples shall also be required for the active travel lane (traversing the Site between the "Florida" area and the northern boundary of Site/VFW entrance) utilized during the transition between the relocation of the IRM haul road to the VFW entrance and the construction of the STRA Outdoor Athletic Field. The travel lane should be noted on applicable figures.

3) Decommissioning samples must be collected at a sampling frequency of one sample per 900 square feet.

4) The decommissioning samples shall be collected below original ground surface at 0-2 inches and 2-12 inches, or at 6-12 inches if the soil will be removed in the top 6 inches.

5) All samples will include PCBs, Metals, and 25 percent will include SVOCs, VOCS and Emerging Contaminants.

6) If analytes are detected above restricted residential Soil Cleanup Objectives (SCOs), then soil will be removed from the affected area to a depth of (six inches), and additional documentation samples shall be collected.

7) The footprint of the temporary infrastructure and affected areas shall be surveyed and contain a demarcation layer prior to backfilling in accordance with the final cover system requirements.

8) The final Temporary Infrastructure Decommissioning sampling work plan for haul roads, temporary transit routes, and material storage areas shall be provided to the NYSDEC and NYSDOH under separate cover for review and approval prior to the sampling of the Temporary Infrastructure areas. A milestone shall be noted within the project schedule for the anticipated submittal of the Temporary Infrastructure Decommissioning work plan.

C. Traffic Control

6. As discussed during the September 9, 2021, Technical Call Meeting, and discussions regarding the IRM 5, Amendment #2, a Traffic Coordinator is required during the field implementation of the IRM 5, Amendment #2 to ensure proper traffic flow and the completion of decontamination procedures for trucks entering and exiting the IRM 5, Amendment#2 and Football Field Complex (FFC) areas during the IRM5, Amendment#2.

   a. Traffic Coordinator

      1) A traffic coordinator shall be identified, contact information provided, and responsibilities summarized, within the work plan.

      2) The traffic coordinator shall be responsible for coordinating the haul traffic between the IRM 5, Amendment#2 and the FFC sites, ensure the proper use of the IRM haul road and the temporary transit roads, and maintain access for trucks loading and unloading materials.

b. ECSD FFC Access

1) The ECSD contractors will use the Keefe Street construction entrance and IRM temporary haul roads for deliveries to the Elmira High School (EHS) stadium improvement project per agreements with Unisys and VFW Post 901."

2) The ECSD contractor shall have access to football field complex via VFW construction entrance and the main temporary IRM Haul Road. IRM contractor and ECSD contractor shall coordinate truck traffic. The main temporary haul road will be adjusted as required as the IRM 5, Amendment#2 excavation proceeds.

D. Additional Delineation

7. Soil and Groundwater

a. All existing monitoring wells (MWs) contained within the NAF are required to be maintained for future groundwater sampling. Any removal of monitoring well(s) during the IRM 5, Amendment#2 will require prior Agency approval. Submit a list of the NAF MWs proposed for removal and/or decommissioning due to the IRM 5, Amendment#2 implementation, including the MW construction log and a summary of previous groundwater COPC exceedances.

b. As summarized within the Agency September 9, 2021, preliminary IRM review email, and the subsequent follow up Geosyntec September 15, 2021, email, the Agency provides the following responses regarding required further soil and groundwater delineation:

1) The Interim Remedial Measure is not the final remedy for the site and additional actions may be required to address remaining impacts (i.e., VOCs in soil and groundwater). Final remedial actions will be evaluated based on all remedial investigation data.

2) The final locations for any remedial technologies will be determined after the remedial investigation has been completed and potential source areas, including the VOCs in the NAF, have been delineated. Remedial actions may be necessary within the NAF.

3) Information contained within the work plan text, *Previous Investigations - Soil*, page 6, states that "Soils at and above two (2) feet bgs will be removed from the NAF to achieve the IRM action level of Restricted Residential SCOs.", this is inconsistent with the remedial design figures and other information provided within the IRM 5 Amendment#2 work plan which depicts portions of the NAF soils at and above two (2) bgs is to remain as soil cover. Modify the work plan statement to be consistent with the proposed IRM design.

4) Information contained within the work plan text, *Previous Investigations – Soil*, page 7, states that "Protection of Groundwater (PoG) SCOs are not applicable as IRM action levels for soils below two (2) feet bgs with the exception of total PCBs at fourteen (14) to sixteen (16) ft bgs based on detections of PCBs in groundwater.", is incorrect. Where groundwater standards are exceeded or threatened, then PoG is applicable for comparison criteria and cleanup for all soil above or in contact with groundwater. Modify the work plan statement

regarding PoG criteria applicability.

5) Information provided with the Geosyntec September 15, 2021, email states that “It is anticipated that the final soil remedy will not impact the NAF after IRM restoration.” The potential for future remedial actions within the NAF to impact the NAF restoration must be considered to reduce any potential impact to the use of the NAF after IRM completion. The work plan shall discuss the potential impact to the NAF after IRM completion due to the future required soil and groundwater delineation and/or remedial actions.

c. AOC-19 and MW-57: Information provided regarding the further Soil Delineation of Area of Concern 19 (AOC-19) to the north and south and potential sources near MW-57 is incomplete (August 4, 2021, Agency Comment B.3). The findings of the additional Site Investigations conducted in the vicinity of AOC-19 and MW-57 have been insufficiently documented and presented within the work plan text, figures and/or construction drawings as appropriate.

6) The extent of deep VOC soil contamination in the Area of Concern 19 (AOC-19) is not fully delineated (B3454 / B3920 / 22-28’ bgs). The source areas need to be addressed for transparency and determination of what future remedial investigation activities will be required after the athletic fields are constructed in the vicinity of AOC-19.

7) MW-57 investigations findings are not comprehensively presented within the work plan text, figures construction drawings. Specifically, comprehensive analytical results for SSHS-B3910, B3911, and B3913 are not contained within data summary tables. Additionally, Figure 6F shows the location of MW-57 which appears to be approximately 50 feet to the East of the boring cluster. Please confirm the location of MW-57 with respect to borings cited above for delineation of impacts at depth.

8. Soil Vapor

a. Table 1B, Soil Vapor: Soil vapor intrusion will be required to evaluate exposure pathways for future on-site structures and the final remedy will include a provision for implementation of appropriate actions as needed.

9. Drywells

a. Agency requested drywell verification of existing data and required supplemental soil sampling locations are incomplete (August 4, 2021, Agency Comment B.4). Discrepancies regarding the location and proposed future status of the drywells (i.e., future status of all drywells as existing, proposed, existing – to be removed) are contained within the IRM work plan, text, figures and drawings. Provide updated figures citing the applicable criteria of PoG for drywell infiltration areas and an analytical summary table for the available analytical data for each drywell location, identify additional proposed sampling to address data gaps, and cite the applicable criteria of PoG. Update the work plan text, figures, schedule, and construction drawings as appropriate to correct noted discrepancies for the drywell activities.

b. Additional drywell soil sampling shall be required as dictated by the Agency and compared to the applicable criteria of PoG.

E. Soil Cover Verification

10. The final Soil Cover Verification sampling work plan for areas outside of the excavation, haul roads and materials storage areas shall be provided to the NYSDEC and NYSDOH under separate cover for review and approval prior to the Soil Cover Verification sampling. A milestone shall be noted within the project schedule for the anticipated submittal of the Soil Cover Verification work plan.

11. The required Soil Cover Verification work plan (text, figures, schedule, and drawings) shall be updated to incorporate the requirements addressed within this comment letter.

12. As discussed during the several project calls regarding the IRM 5, Amendment #2 Soil Cover Verification and recent follow up Geosyntec September 10, 2021, email and presented soil cover verification grid sampling layout, the required methodology for the soil cover verification sampling shall include:

    a. The top two feet of all areas where the soil cover will become the final remedy shall be sufficiently evaluated for potential human health exposure through the collection of required analytical data.

    b. For areas outside of the IRM excavation requiring modification (i.e., irrigation and/or sod for Athletic fields), all remedial activities must be complete prior to the removal of the sod and six inches of soil. Cover system verification sampling shall occur after the removal of sod and soil is completed.

    c. Soil cover verification shall be evaluated separately within these distinct areas:

        1) Soils (0-24 inches) not disturbed by IRM activities:

            i. Sampling to include composite samples intervals 0-2 (0-6 for VOCs) 2-12 and 12-24 inches in accordance with the DEC soil screening guidance.

        2) Soils (6-24 inches) under decommissioned areas (MSA/Haul Road):

            i. The 6-12 inch sample interval will require discrete sampling for PCB and metals, with 25 % of the samples additionally collected for VOC, SVOC and emerging contaminants. Th 6-12 inch sample interval shall be completed at a frequency of 1 per 900 square feet.

            ii. The 12-24 inch may be completed in accordance with the DEC soil screening guidance.

        3) Soils under 6 inch soil removal for construction:

            i. Intervals of composite samples at 6-12, 12-24 inch may be completed in accordance with the DEC soil screening guidance.

    d. The revised figure and/or figures shall include and differentiate:

        1) All previous, current or future MSA or Haul roads (including the active travel lane which traversed the Site between the “Florida” area and the northern boundary of Site/VFW entrance) shall be depicted on the IRM 5, Amendment #2 figures and drawings.

        2) All remedial excavation areas and limits.

3) All construction excavation areas (6 inch soil removal, etc.) and limits.

4) All known soil quality sampling information in the 0-24 inch sample intervals for all CPOCs; providing separate figures for surface (0-2 inch) and shallow subsurface (2-6 inch, 2-12 inch, and 12-24 inch) soil quality verification sample results.

5) Provide a revised Figure illustrating the proposed Soil Cover Verification sample locations and analytes. Soil Cover Verification sampling is required to be representative of the sample area and address data gaps.

13. Soil Cover System Backfilling:

a. Intermediate grades must be maintained in areas where others are responsible for restoration until the final cover is installed to prevent dust and erosion from the site to adjacent properties. Provide additional information regarding activities that will be conducted for maintenance of the IRM areas prior to restoration.

b. Provide the cross-sections for each cover system type within the entire restoration area, including restoration being completed by ECSD contractors, within the appropriate figures and construction drawings. These figures and construction drawings must include the demarcation layers.

F. Proposed Soil Cover Systems (Figure 7 and Drawing 22)

14. Per the Agency September 16, 2021, email, the Agency provided the following comments and attached marked-up figure regarding the updated Figure 7 – Final Cover System (revision#1) submitted September 14, 2021. Comments provided for the Final Cover Systems (Figure 7) shall also be implemented into the work plan documents text, figures, and drawings (specifically Drawing 22 and Drawing C4.0) as applicable.

a. General Figure Comments

1) Identify the Limits of the BCP Site (see figure comment #10).

2) Remove overlapping patterns for Asphalt and Lawn/Natural Grass – Seed Mulch; denote correct proposed soil cover system in all areas (see figure comment #3).

3) Identify All structures illustrated on the Figure and denote the use of existing/new structures as proposed cover systems (see figure comments #4 and #5).

4) Identify and describe the property area shown between the Lawn/Natural Grass soil cover and the noted property boundary (see figure comment #6).

5) Remove all previous structures, slabs and/or asphalt surface covers related to previous IRM activities and/or historic surface covers (i.e. structures, slabs and asphalt surface covering formerly located within the STRA) (see figure comment #7).

b. Legend

1) Define utilities within Legend (see figure comment #1).

2) Identify existing/new structures.

c. Cross-Sections

1) Provide Cross-section details for ALL Proposed Soil Cover Systems identified within the Figure/Legend; All cover systems need detailed cross-sections regardless of who is constructing them to verify that an engineering control will be installed. place cross-sections on a separate figure sheet.

2) Ensure hatching patterns are unique for each soil cover material (see figure comment #11).

3) Identify and detail depths of utilities within the cover system (see figure comment #1).

4) Identify existing/new structures (i.e., dugout) to be used as soil cover within a cross section (see figure comment #5).

5) Clarify the cross-section components and corresponding depths of the Lawn/Natural Grass for the seeded/mulched areas and the topsoil and Sod areas (see figure comments #2, #15, and #16).

6) Demarcation layer must be designed and specified as a minimum depth of 2 ft (see figure comment #13).

d. Notes

1) Note #1 – Specify that the top two feet of existing native soils shall be verified to meet Restricted Residential soil quality with no demarcation layer (see figure comment #8).

2) Specify Restricted Residential Soil Quality for all Imported Fill materials (see figure comment #14).

3) Specify Protection of Groundwater (PoG) Soil Quality for all verified/imported in noted infiltration areas (see figure comment #12)

4) Specify minimum depth of topsoil for each cover system (see figure comments #9 and #17).

5) Specify the minimum depth of the soil cover, reuse materials, imported fill materials, and demarcation layers (see figure comment #13).

6) Add text description of All soil cover system types.

Under separate cover, please provide a response to the ECSD comments included in the “Comments to the September 3, 2021, Revised IRM #5 Work, Amendment #2, Site #c808022” document provided as Attachment 1 to this comment letter.

Within 15 days, please elect in writing to modify the work plan within 30 days of this notice or take other actions in accordance with the consent order.

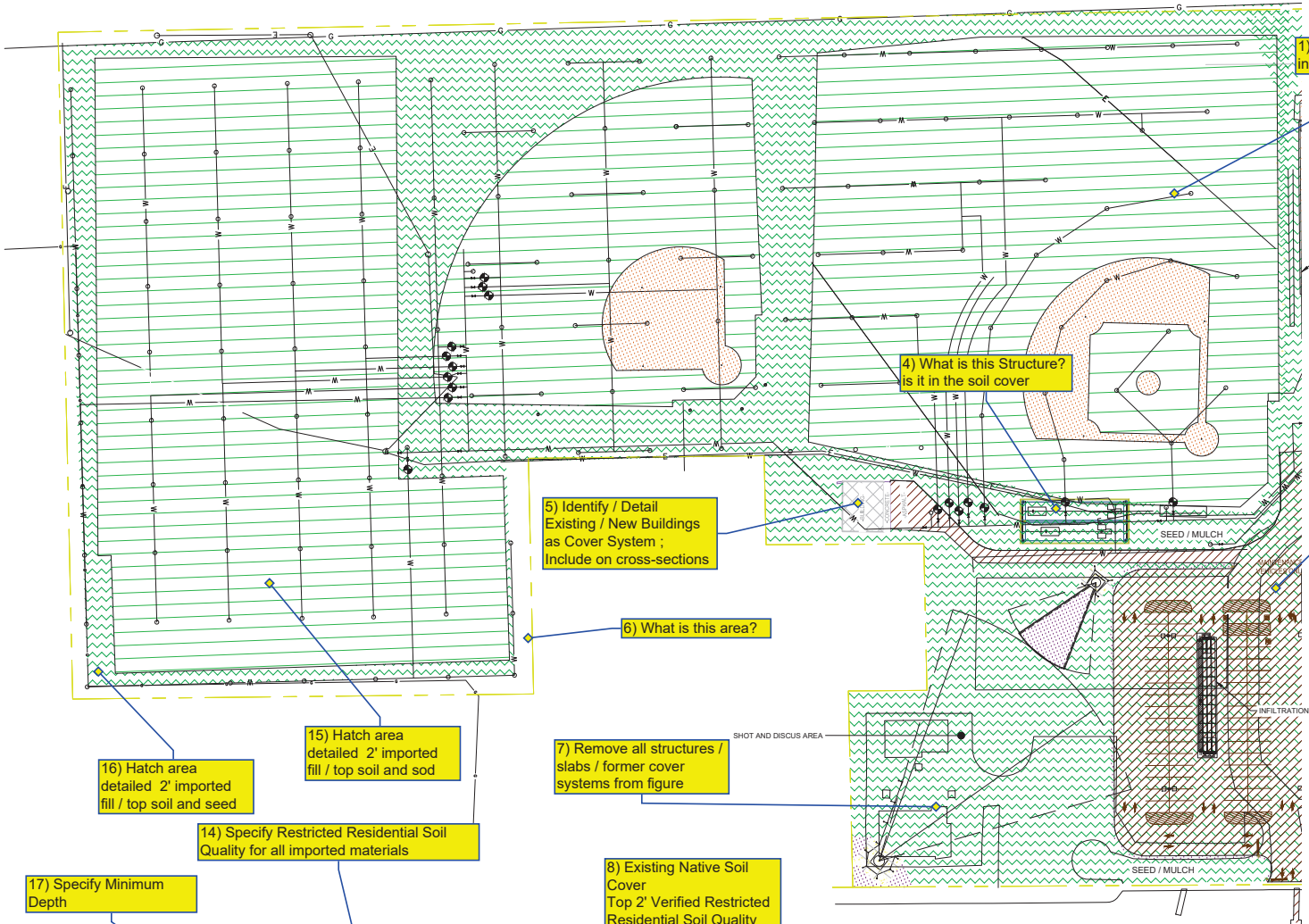
Please contact me at (585) 226-5480 if you have any questions regarding this letter.

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



1) Identify / Detail Utilities in Cover System

2) Hatch area detailed 2' imported fill / top soil and seed

3) Remove overlapping patterns for Asphalt and Lawn/Natural Grass - Seed Mulch

4) What is this Structure? is it in the soil cover

5) Identify / Detail Existing / New Buildings as Cover System ; Include on cross-sections

6) What is this area?

7) Remove all structures / slabs / former cover systems from figure

8) Existing Native Soil Cover Top 2' Verified Restricted Residential Soil Quality No Demarcation

9) Specify Minimum Depth

10) Include the limits of the BCP

11) Same Hatch Pattern as Asphalt

12) Specify PoG Soil Quality - verified/imported

13) Demarcation not designed/specified at required 2' minimum depth

14) Specify Restricted Residential Soil Quality for all imported materials

15) Hatch area detailed 2' imported fill / top soil and sod

16) Hatch area detailed 2' imported fill / top soil and seed

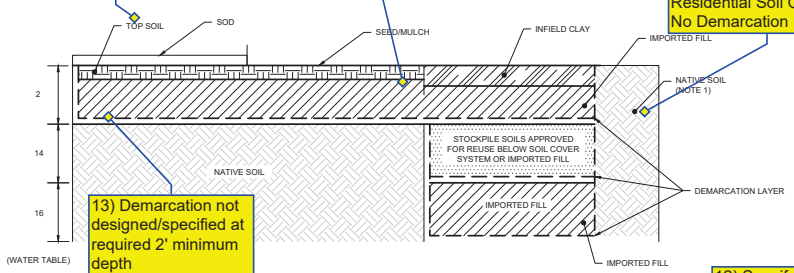
17) Specify Minimum Depth

LEGEND

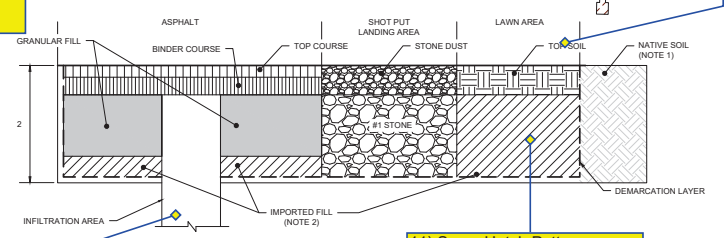
- ASPHALT PAVEMENT
- LAWN/NATURAL GRASS - SEED/MULCH
- COMPACTED CRUSHED STONE
- LAWN/NATURAL GRASS - SOD
- INFIELD CLAY
- NATIVE SOIL
- PROPERTY BOUNDARY

NOTES:

1. SOIL QUALITY OF TOP TWO FEET OF NATIVE SOILS WILL BE VERIFIED AS SUITABLE FOR SOIL COVER PRIOR TO FINAL RESTORATION. A SOIL COVER VERIFICATION SAMPLING PLAN WILL BE SUBMITTED UNDER SEPARATE COVER.
2. UNISYS SHALL PROVIDE DEMARCATION LAYER AND IMPORTED FILL TO ECSD INTERMEDIATE GRADES. ALL OTHER SOIL COVER COMPONENTS SHALL BE PROVIDED BY ECSD.



CROSS-SECTION
BALLFIELD AREA SOIL COVER SYSTEM



CROSS-SECTION
SHOT AND DISCUS AREA SOIL COVER SYSTEM

0 40 80
SCALE IN FEET

PROPOSED SOIL COVER SYSTEMS

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

UNISYS

DATE:	SEPTEMBER 2021
PROJECT NO.	MN0832I
DOCUMENT NO.	
FILE NO.	MN0832IF1015
FIGURE NO.	7

HSE
Harter Secrest & Emery LLP
ATTORNEYS AND COUNSELORS
WWW.HSELAW.COM

September 17, 2021

VIA EMAIL

Mr. Aron Krasnopoler, Ph.D., P.E.
B&B Engineers & Geologists
10211 Wincopin Circle, Floor 4
Columbia, Maryland 21044

Re: Comments to the September 3, 2021 Revised IRM #5 Work Plan, Amendment #2, Site #c808022

Dear Mr. Krasnopoler:

The Elmira City School District ("**ECSD**") submits the following comments to Revised Amendment #2, Interim Remedial Measures #5 Work Plan for the Former Sperry Remington Site – North Portion (#c808022) dated September 3, 2021 submitted by B&B Engineers & Geologists of New York, P.C. on behalf of Unisys Corporation ("**Unisys**") ("**IRM #5WP, A2**")[1]. The following comments and questions are being provided directly to Unisys with a copy to New York State Department of Environmental Conservation ("**NYSDEC**") and are presented based upon a specific topic and/or drawing, as appropriate. Several of the below comments are also paired with call out boxes added to the relevant drawings attached to this letter. These comments are in addition to the NYSDEC comments previously provided.

1. **General Comment**

   As you will note in several comments below, various elements on the drawings may be inconsistent from drawing to drawing or when comparing the construction/restoration drawings to the work plan figures. Please carefully proof all sets of drawings and figures for consistency.

2. **Dry Well Removals**

   A. The dry wells scheduled for removal should be reviewed for consistency between the work plan figures and Unisys construction drawings. Some dry wells identified for removal on the Figures are not identified for removal on the construction drawings. Which figures/drawings are accurate?

[1] For purposes of these comments IRM #5WP, A2 includes revised Figure 7 provided by email from Mr. Krasnopoler on September 14, 2021.

1600 BAUSCH & LOMB PLACE ROCHESTER, NY 14604-2711 PHONE: 585.232.6500 FAX: 585.232.2152
ROCHESTER, NY • BUFFALO, NY • ALBANY, NY • CORNING, NY • NEW YORK, NY

3. **Unisys Drawing #2, Existing Conditions**

   A. See call out boxes on attached drawing.

   B. The "found storm structure" mentioned in one call out box also impacts Unisys Drawing #5, Excavation Plan.

4. **Unisys Drawing #3, Site Work Plan Phase 1**

   Show connection between the temporary remediation haul road and temporary haul road for ECSD use.

5. **Unisys Drawing #4, Site Work Plan Phase 2**

   Will existing haul roads east of FFC be utilized as part of or following IRM 5A2? It appears as though they will be cut off from access because of the NAF restoration. If they are no longer needed, show their removal in construction sequence information.

6. **Unisys Drawing #5, Excavation Plan**

   A. See call out boxes on attached drawing.

   B. Be sure the new baseball field scoreboard is protected.

7. **Drawing #6, Demolition Plan**

   A. See call out boxes on attached drawing.

   B. At the softball field, note should read, "Remove dugouts and chain link fencing."

   C. At the VFW entrance, note reads, "that fence should be removed for Phase 2 entrances" however, entrance is also needed for Phase 1.

   D. There are several light poles shown to be removed at the far north field. However, several additional poles are shown as remaining. The utility removal plans indicate that portions of the feed to these poles is to be removed with all wiring associated with those poles to be removed back to panel. This will leave several existing poles and lights standing with no power to them. All light poles at the far north field should be removed as a single system.

   E. The area highlighted by a balloon just east of the basketball court shows two existing light poles. Only one light pole is existing in this area. The other "former" pole should be removed from base drawing along with the others indicated by the call out boxes.

8. **Unisys Drawings #7, Utilities Removal and Former Industrial Sewer Removal**

   Dry well indicated by call out box on attached drawing located at very edge of planned excavation should be removed by Unisys.

9. **Unisys Drawings ##8 thru 15, Excavations at Various Depths**

   The construction drawings starting on Drawing #8 still show an excavation area extending over the "limit of disturbance line" in the northwest portion of the work area (see S883 location). In this same location, the existing gas line is not shown other than on the existing conditions sheet and should be carried onto all sheets for reference.

10. **Unisys Drawing #10, 4-6FT Excavation**

    The 4-6 ft excavation north of the existing ECSD ground storage shed is inconsistent between Sheet 10 and Figure 3D of the work plan.

11. **Unisys Drawing #21, Intermediate Grading Plan**

    A. See call out boxes on attached drawing.

    B. As noted by one call out box, revise intermediate grades shown to reflect intermediate grades in "Florida area" previously provided to Unisys by Hunt Engineers.

    C. The intermediate grades shown on this drawing are not consistent with the restoration plan, Unisys drawing #22, and Marathon Engineering Restorations Plans. Generally, speaking they appear to be too low.

12. **Unisys Drawing #22, Restoration Plan**

    Notation for Shot Put / Discus area should refer to the ECSD construction drawings for restoration in this area.

13. **Unisys Drawing #23, Erosion and Sediment Control Plan**

    The erosion and sediment control plan (sheet 23) shows silt fence inside the limit of disturbance.

14. **Marathon Engineering Drawing C-4.0, Soil Management Plan (1 of 5)**

    See call out boxes on attached drawing.

15. <u>Marathon Engineering Drawing C-5.0, Grading Plan</u>

A. See call out boxes on attached drawing.

B. As noted by several call out boxes, elevations called for in several areas are too steep for safe play and need to be adjusted.

C. Spot elevations for each of the 4 softball field bases and pitchers rubber should be shown just like the baseball field.

16. <u>Irrigation Valves – Placement and Consistency</u>

A. Irrigation valves cannot be in the field of play.

B. Comparison of the irrigation layout on revised Figure 7 sent via email dated 9/14/2021 with Marathon Engineering Drawing C-6.0 show vastly different layouts. C-6.0 is acceptable as the valves are all well off the field of play on all fields. Perhaps Figure 7 did not utilize the most current irrigation layout? Please revise.

17. <u>Schedule, Table 7 and Pages 25, 26 of Work Plan</u>

A. Table 7 shows "Soil Cover Verification Sampling Plan Submittal" on 9/10/2021. ECSD has not seen a copy of that submission. If it has not yet been submitted, please revise the schedule accordingly. If it has been submitted to NYSDEC, please provide a copy for ECSD review. When would this sampling work plan be performed? It is ECSD's recommendation that it be performed during Phase 1 or 2 remediation activities and well in advance of Phase 3 to be sure the results, analysis and any "soil cover" remedial plan is developed and implemented before the conclusion of Phase 3.

B. ECSD appreciates the more conservative approach being taken toward scheduling of this IRM #5A2. Having said that ECSD notes that turnover of the Phase 3 area to ECSD for capital improvements does not occur until 9/23/2022, making it very tight for ECSD to complete the improvements in this area to allow for spring 2023 use. ECSD further notes that the schedule assumes decommissioning of the STRA will take 2 months. Recognizing that the start of Phase 3 remediation is tied to STRA decommissioning which cannot commence until the end of the school year, ECSD respectfully requests that Unisys take every opportunity possible to accelerate the tasks associated with the STRA decommissioning and Phase 3 remediation so that turnover can occur sooner than the 9/23/2022 date.

ECSD looks forward to approval of the further revised work plan, and appreciates any and all efforts to complete the work well within the timeframes provided.

Very truly yours,

Harter Secrest & Emery LLP

Paul D. Sylvestri
DIRECT DIAL: 585.231.1194
EMAIL: PSYLVESTRI@HSELAW.COM

PDS:hlh
cc: T. Schneider, P.E., DEC
J. Stenerson, Esq., DEC
H. Austin, ECSD
K. Krueger, Unisys
E. Parker, Esq., Unisys
M. Murphy, Esq., B&D
P. Brookner, Geosyntec
J. Magliocca, ECSD
T. Johnson, Sterling
S. Cyr, Hunt

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 I F: (585) 226-8139
www.dec.ny.gov

Via E-mail

October 22, 2021

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

Re: Revised Amendment #2
Interim Remedial Measure #5 Work Plan
Former Sperry Remington Site – North Portion (NYSDEC #c808022)
777 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 Amendment #2 Interim Remedial Measure #5 Work Plan, Former Sperry Remington Site – North Portion #c808022", dated October 8, 2021, and **Approve as Modified below:**

A. General

1. This IRM 5, Amendment #2 Work Plan approval as modified is limited to the excavation of accessible contaminated material above the groundwater table and should not be interpreted as the final remedy for the North Athletic Field (NAF) area. The evaluation of comprehensive remedial investigation results not yet completed or presented in this work plan will identify additional activities (if necessary) to support the final remedy

2. As detailed within Section D of this letter, authorization of existing or proposed drywells for infiltration is not approved due to the insufficient documentation in this work plan.

3. Revised Figures and Construction Drawings depicting approved modifications must be resubmitted for Agency authorization to proceed.

B. Site Access and Health and Safety

4. Site access shall be coordinated with the designated Traffic Coordinator: Scott Sutton, Recon Superintendent. Contact information for the designated Traffic Coordinator shall be distributed to all project stakeholders.

5. The traffic coordinator shall be responsible for coordinating all traffic between the IRM 5 Amendment#2 and the football field complex (FFC) site, ensure the proper use of the IRM haul road and the temporary transit roads, and maintain access for trucks loading and unloading materials.

6. Coordination is required and a protocol in place for Site access to the IRM 5, Amendment #2 Limit of Disturbance (LOD). As discussed during the NYSDEC administrative call on October 19, 2021, and/or depicted within Construction Drawing 2, the following activities shall be implemented and maintained during the duration of the IRM 5 Amendment #2 activities:

   a. Perimeter fencing with gates at access points shall be installed at the IRM 5 Amendment #2 LOD. Fencing will be installed along the east side of the football field upon final grading of the Former Industrial Sewer (FIS) area. Temporary site access measures (i.e., traffic cones and caution tape) shall be placed at the LOD prior to the FIS excavation grading completion. Gates will be locked except when access to/from the IRM LOD is required by Unisys or others.
   b. All access points to the IRM 5, Amendment #2 LOD must be secured with gates and signs posted for authorized access only / health and safety purposes. Signs will be posted at access points directing visitors to sign in at the construction trailers.
   c. Norfolk Southern (NFS) property / potentially contaminated materials must be properly secured with appropriate fencing and signage as necessary.
   d. ECSD access to the EHS maintenance shed will be maintained through the STRA gates through coordination with the designated Traffic Coordinator. ECSD locks have been placed on the STRA gates to control access.
   e. The ECSD contractor will access the FFC via the VFW construction entrance (located via Keefe Street and VFW parking area) and the main temporary IRM Haul Road. The access shall be coordinated with the designated Traffic Coordinator. If the ECSD contractor chooses to enter the FFC from an area outside of the IRM 5 Amendment #2 LOD, Unisys shall notify the Agency.

7. Health and Safety issues shall be addressed with the designated Site Health and Safety Officer: Kyle Cunningham, Recon Site Engineer. Contact information for the designated Health and Safety Officer shall be distributed to all project stakeholders.

8. CAMP monitors shall maintain operation and function in real time. Readings shall be recorded every 15 minutes either remotely or manually.

C. Haul Roads and MSAs

9. All requirements contained within the September 21, 2021, NYSDEC Disapproval letter, Section B – Haul Roads and MSAs, shall be addressed within the Temporary Infrastructure Decommissioning work plan.

10. The existing Haul Roads located east of the FFC on the Norfolk Southern Property, constructed in accordance with IRM#4 workplan dated May 19, 2020, shall be appropriately decommissioned. A Temporary Infrastructure Decommissioning work plan shall be submitted to the NYSDEC and NYSDOH for review and approval. A deliverable milestone date shall be included within the updated IRM 5, Amendment #2 Project Schedule for the work plan.

11. Approval of the final Temporary Infrastructure Decommissioning sampling work plan for NAF haul roads, temporary transit routes, and material storage areas, to be provided to the NYSDEC and NYSDOH under separate cover (anticipated submittal date 10/22/21), is required prior to the sampling of the Temporary Infrastructure areas.

12. Locations of temporary haul roads, transit roads, and IRM temporary infrastructure shall be properly documented (i.e., GPS coordinates surveyed and locations depiction on Site figures as applicable) and tracking figures and table shall be compiled and submitted to the Agency. All temporary haul roads, transit roads, and IRM temporary infrastructure located in areas outside the IRM 5 Amendment #2 excavation limits shall be restored in accordance with the forthcoming Temporary Infrastructure Decommissioning sampling work plan.

13. Excavation step-out completions shall be tracked within an Excel table, including information such as the sample identification number, sample depth interval, and exceedance information (CPOC parameter, analytical result (mg/kg). The step-out tracking shall be submitted to the Agency on an on-going basis for review.

14. Subsurface structures (i.e., pipes, vaults, USTs, drywells, etc.) encountered during the excavation of IRM5 Amendment #2 shall be tracked within an Excel table, including information such as structure location (i.e., IRM area number), structure depth, associated sample collection/sample exceedances, and action taken (i.e., removed or left in place). The structure tracking shall be submitted to the Agency on an on-going basis for review.

D. Additional Delineation

15. Soil and Groundwater

    a. All monitoring wells (MWs) contained within the NAF are required to be maintained or replaced for future groundwater sampling.

    b. NAF MWs proposed for removal and and/or decommissioning due to the IRM 5 Amendment #2 implementation will require prior written Agency approval. Documentation including the MW construction log and a summary of previous groundwater COPC exceedances shall be submitted under separate cover for agency review and approval prior to the MW removal and/or decommissioning. A deliverable milestone date shall be included within the updated IRM 5, Amendment #2 Project Schedule for the MWs proposed for removal and/or decommissioning.

16. AOC-19 and MW-57 Soil Delineation

    a. The comprehensive findings of soil investigations conducted from below the water table in accordance with the Soil and Groundwater Investigation Work Plan Addendum, Northern Athletic Fields dated April 2021 and subsequent soil investigations completed in the vicinity of AOC-19, MW-57, and the Infiltration Area have been insufficiently documented and presented within the work plan submittal. The Agency has previously cited this deficiency within both the August 4, 2021, Agency Comment B.3 and September 21, 2021, Agency Comment D.

b. As discussed during the October 21, 2021, project call regarding the further delineation of the deep VOC soil contamination in the AOC-19, additional sampling shall be completed under a forthcoming sampling plan. The additional sampling plan shall not commence prior to the Agency review and approval of the updated sampling plan.

17. Drywells

a. Several newly identified drywell structures, as noted below, have been identified on the historical drawing "Site Plan North Mechanical Electrical – Sheet number M-2d" provided by ECSD as part of ESCD comment letter dated 10/19/21. Newly identified structures shall be illustrated on relevant updated work plan figures and drawings and addressed as part of the work plan (**ECSD Comment 2B**).

i. Drywell DW-18 appears to have connection to a secondary drywell with a buried top. Update plan to include removal of buried drywell as needed.

ii. Drywell DW-2 appears to have connection to large rectangular structure. Add newly identified structure to relevant drawings and figures, describe fate of structure (i.e., removal or replacement).

iii. Drywell at STRA entrance (**ECSD Comment 2B**); add newly identified structure to relevant drawings and figures, describe fate of drywell (i.e., removal or replacement).

iv. Two connected drywells between ECSD maintained building and private residence have been identified, update relevant drawings and figures, describe fate of structure (i.e., removal or replacement).

b. A comprehensive sampling work plan shall be submitted to the Agency under separate cover and a deliverable milestone date shall be included within the updated IRM 5, Amendment #2 Project Schedule.

c. The work plan shall demonstrate the soil quality in the drywell infiltration areas of the existing, proposed, and newly identified drywell structures and propose additional required CPOC soil sampling. The additional proposed sampling shall address additional required CPOC data within the infiltration depth interval (4 ft to groundwater table) for the Site CPOCs (PCBs, Metals, SVOCs, and VOCs). SVOC data containing only Diesel Range Organics (DRO) or PAHs results shall be considered insufficient by the Agency. The data shall be compared to the applicable CPOC Protection of Groundwater (PoG) criteria and presented data shall represent soil infiltration conditions in the near vicinity of the designated Drywell.

E. Soil Cover Verification

18. All requirements contained within the September 21, 2021, NYSDEC Disapproval letter, *Section E – Soil Cover Verification*, shall be addressed within the final Soil Cover Verification sampling work plan to be provided to the NYSDEC and NYSDOH under separate cover (anticipated submittal date 10/22/21). Soil Cover Verification sampling may commence only upon the NYSDEC and NYSDOH review and approval of the work plan.

F. Proposed Soil Cover Systems (Figure 7 and Drawing #22)

19. Proposed Soil Cover System (Figure 7) required modifications shall also be implemented into the drawings (specifically Drawing #22 and Drawing C4.0) as applicable.

20. Identify all structures illustrated on the Figure and denote the use of existing/new structures as proposed cover systems (i.e., maintenance building, etc.).

21. Each Soil Cover system type shall be described within the Notes section.

22. Correct the text error within the Legend; “Soil Over” should be “Soil Cover”.

23. All areas within the IRM excavation limit, IRM Pod excavation limits, and Infiltration Area shall be identified as the appropriate Soil Cover with correct hatching illustrated.

24. Utilities and associated depths must be noted within the cover system cross-sections and notes.

25. All Demarcation Layers must be designated and specified as a minimum depth of 2 ft within Figure 7 cross-sections and notes.

26. For Note #1, Specify that the top two feet of existing native soils (containing no demarcation layer) shall be verified to meet Restricted Residential soil quality.

27. An As-Built Soil Cover System Figure shall be required upon the completion of the IRM 5 Amendment #2 completion.

G. Construction / Restoration Drawings

As referenced in Comment #2 all revised as modified Construction Drawings must be resubmitted for Agency authorization to proceed. A deliverable milestone date shall be included within the updated IRM 5, Amendment #2 Project Schedule for the resubmittal of the Construction Drawing package.

28. All existing utilities shall be appropriately identified within the drawings noting any required modifications (**See ECSD comment #4**).

29. Drawing #2 – Show the location of FFC access Equipment Wash pad.

30. Drawing #3 - remove all artifact notes and callout boxes (i.e., “Access for Imported Materials” callout near former South Main Street Entrance and location of the former Equipment Wash Pad) from previous IRM construction drawings not applicable to current site conditions.

31. Drawing #4 – Provide citation note for TSCA accumulation area. Correct Error in spelling of TSCA.

32. Drawings #8 through #15 – Fill patterns used to identify excavation material appear incorrect and overlapping on multiple drawings (i.e., TSCA material hatching is incorrectly depicted on each drawing within limits of AOC 19). Confirm accuracy of the fill patterns for each drawing and eliminate unnecessary overlaps and errors. Updated drawings shall be resubmitted.

33. Drawing #15 - Remove the leader pointing to TSCA / PCB fill pattern.

34. Drawing #21 - As stated previously, a minimum of two feet of clean soil cover is required throughout the proposed excavation area. Confirm that intermediate grades, presented on Drawing #21, demonstrate that a minimum of two feet soil cover will be in place as shown on Drawing #22 within the entire limits of excavation, including the “Florida area”.

35. The construction entrance depicted on Drawings #2 through #4 shall be included as part of Drawing #22 – Restoration. Furthermore, the LOD shall encompass the VFW entrance on all applicable drawings and be included as part of site restoration plans and subject to temporary decommissioning sampling requirements.

36. Inconsistency between Figure 7, Drawing #22, and Drawing C4.0 persists (i.e., the limits of restoration noted on Drawing #22 and Figure 7 are inconsistent, therefore the more conservative Figure 7 limits shall be used). Drawing #22 requires the correction of all inconsistencies and resubmittal.

37. Provide the cross-sections for each cover system type within the entire restoration area, including restoration being completed by ECSD contractors, on the appropriate figures and construction drawings. These figures and construction drawings must include the demarcation layers.

38. Siteone – Sheet #1R-2 - Project Services Irrigation Plan, included as Attachment to Figure 7 – Irrigation system specifications 14 and 17 depict Mainline/Lateral Pipe and Wire Trench in both imported fill soils and native soils, respectively. These drawings indicate that intrusive activities will be completed at a depth greater than 24 inches; this work may require compliance with ISMP. Demarcation Layers are required at a minimum of 24" bgs.

H. Schedule

39. Deliverable dates shall be included within the updated IRM 5, Amendment #2 Project Schedule for all submittals required within this letter.

40. Discrepancies between table and appendix 7 shall be resolved (i.e., delivery of Phase 3 Site Plan Submittal (Tues 4/5/2022) Table 8, (Mon 11/15/21) Attachment 7) shall be corrected and updated as appropriate within the IRM 5, Amendment #2 Project Schedule resubmittal.

41. Schedule requirements associated with Phase 3, including live loading of materials and associated material transport and disposal using South Main Street entrance shall be implemented as appropriate within the IRM 5, Amendment #2 Project Schedule resubmittal.

42. Schedule requirements associated with ISMP activities and required documentation sampling required within Phase 3 for the Capital Improvement Area shall be implemented as appropriate within the IRM 5, Amendment #2 Project Schedule resubmittal.

43. Deliverable date for the revised Enhanced Community Liaison Plan.

Under separate cover, please provide a response to the ECSD comments included in the "Comments to the October 8, 2021, Revised IRM #5 Work, Amendment #2, Site #c808022" document provided as Attachment 1 to this comment letter.

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 Brownfield Cleanup Agreement.

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

HSE

Harter Secrest & Emery LLP

ATTORNEYS AND COUNSELORS

WWW.HSELAW.COM

October 19, 2021

VIA EMAIL

Mr. Aron Krasnopoler, Ph.D., P.E.
B&B Engineers & Geologists
10211 Wincopin Circle, Floor 4
Columbia, Maryland 21044

Re: Comments to the October 8, 2021 Revised IRM #5 Work Plan, Amendment #2, Site #c808022

Dear Mr. Krasnopoler:

The Elmira City School District ("**ECSD**") submits the following comments to Revised Amendment #2, Interim Remedial Measures #5 Work Plan for the Former Sperry Remington Site – North Portion (#c808022) dated October 8, 2021 submitted by B&B Engineers & Geologists of New York, P.C. on behalf of Unisys Corporation ("**Unisys**") ("**IRM #5WP, A2**"). The following comments and questions are being provided directly to Unisys with a copy to New York State Department of Environmental Conservation ("**NYSDEC**") and are presented based upon a specific topic and/or drawing, as appropriate. These comments are in addition to the NYSDEC comments previously provided.

1. **Schedule**

A. ECSD remains concerned that the schedule as presented in this draft of IRM #5WP, A2 calls for turnover of the STRA to ECSD too late for ECSD to complete construction and grass/sod to be established sufficiently for Spring 2023 use. This concern is exacerbated by the fact that the schedule presented does not appear to accommodate working through any punch lists as part of the turnover process. See Comment 1.B, below. See also Comments 1.C and 1.D, below, for questions raised about timing of certain activities and whether that timing can be adjusted in a manner that allows for earlier turnover of the STRA to ECSD.

B. The schedules for Phase 1, Phase 2 and the STRA areas do not appear to account for any punchlist review and approval by ECSD. Phase 1 and 2 areas should have punchlists developed following the Unisys restoration contractor's work. The STRA punchlist needs to occur prior to start of ECSD construction. If the Football Field Complex experience holds true, the punchlist/turnover process for the STRA would take one month, potentially pushing back turnover of the STRA from September 23, 2022 to October 23, 2022 and eliminating the possibility of

1600 BAUSCH & LOMB PLACE ROCHESTER, NY 14604-2711 PHONE: 585.232.6500 FAX: 585.232.2152

ROCHESTER, NY • BUFFALO, NY • ALBANY, NY • CORNING, NY • NEW YORK, NY

play on the shot put/discus area in Spring 2023. This timing is not acceptable to ECSD.

C. Examination of Attachment 7 seems to indicate a lag time between backfill of Area A-6 under Phase 2 on May 27, 2022 (line 39) and the commencement of Phase 2 decommissioning on June 24, 2022 (line 14) followed by commencement of soil cover verification and ballfield restoration on July 7, 2022 (lines 51 and 52, respectively). Since irrigation system installation is a required element prior to harvesting the sod, anything that can be done to allow irrigation system install to occur sooner will assist with STRA turnover timing. The schedule should be revised to commence the above referenced actions immediately following the backfill of Phase 2, Area-6 to allow for an earlier harvesting of the STRA sod and ultimately turnover of the STRA area to ECSD.

D. Areas A-1 and A-2+Pods should be performed concurrently rather than in series to shorten time frames. Planned areas of excavation in Phase 2 should also occur concurrently. This would allow for earlier restoration, including the installation of the irrigation system, and sooner decommissioning of the STRA.

E. Line 60 indicates sod harvesting at the STRA starting September 1, 2022. However, Line 41 shows Phase 3 excavation at the STRA starting August 2022.

F. Line 62 shows turnover of the STRA area to ECSD for construction on September 23, 2022, however Line 17 shows decommissioning of the Phase 3 area lasting until September 30, 2022.

2. <u>Dry Wells</u>

A. A dry well located on the very edge of the excavation area located south of the "Florida Area" is shown to be removed by Unisys Contractor on Drawing #5 while the same dry well is shown to be removed by ECSD on Drawing #7 (both of the Construction Drawings). Given that this dry well is located at the very edge of the anticipated excavation area, it should be removed by Unisys.

B. A dry well located at the very tip of/adjacent and to the west of the "Florida Area" is not shown on any of the drawings. Please revise to show this existing condition. Attached to this letter is an historic drawing and recent photograph depicting the location of this structure previously provided to Unisys.

3. <u>Construction Drawing #5 (Excavation Plan)</u>

The baseball scoreboard is shown too far south. Restoration plans by Marathon Engineers/SWBR appear to show the scoreboard in the correct location. Please refer to

the latest CAD file provided by Hunt (Luke Grasmeyer) to Aron Krasnopoler on or about September 20, 2021.

4. **Construction Drawing #7 (Utilities Removal and Former Industrial Sewer Removal)**

   A. A segment of an existing electrical line appears to be impacted by the excavation in the softball field. This portion of the electrical line needs to be shown to be removed.

   B. A gas line running north into the VFW property appears to be shown as getting removed on this drawing as well as Drawings ##3 thru 6. This is likely a live gas line on that property.

5. **Restoration Drawing #C-4.0**

   There should be restoration hatching shown up to the east and north property boundaries. These areas are going to be disturbed by the construction entrance and are currently being disturbed by soil stock piling areas at a minimum they will need to be decompacted and reseeded or sodded.

6. **Figure 7 of Work Plan**

   The hatching for the final cover systems appear to be switched in some locations for native versus soil cover. Please proof carefully.

As raised in prior comments to IRM #5WP, A2 and in this comment letter, it is of great importance to ECSD that the north athletic field areas, including the proposed shot put/ discus area be useable by Spring 2023. The proposed schedule makes that goal highly unlikely. ECSD respectfully requests that Unisys take every opportunity possible to accelerate the tasks leading up to and associated with the STRA decommissioning and Phase 3 remediation so that turnover can occur sooner than the 9/23/2022 date. To meet that goal, ECSD suggests a teleconference with Unisys, NYSDEC and ECSD to see where changes to the schedule are feasible. For example, can the timeline for tasks with a higher degree of certainty and control such as excavation to original target grades, disposal hauling and backfill placement be condensed to allow adequate time for higher degrees of uncertainty such as step outs/downs and unknown obstruction to occur? In the meantime, ECSD would like Phase 1 to proceed in accordance with an approved IRM #5WP, A2 as soon as possible and subject to revisions to the schedule set forth in that work plan.

Finally, details for proceeding with Phase 3 do not appear in IRM #5WP, A2. It is ECSD's understanding that such details will be provided in a separate deliverable. ECSD requests that deliverable be added to the schedule.

ECSD looks forward to approval of the revised work plan, and appreciates any and all efforts to complete the work well within the timeframes provided.

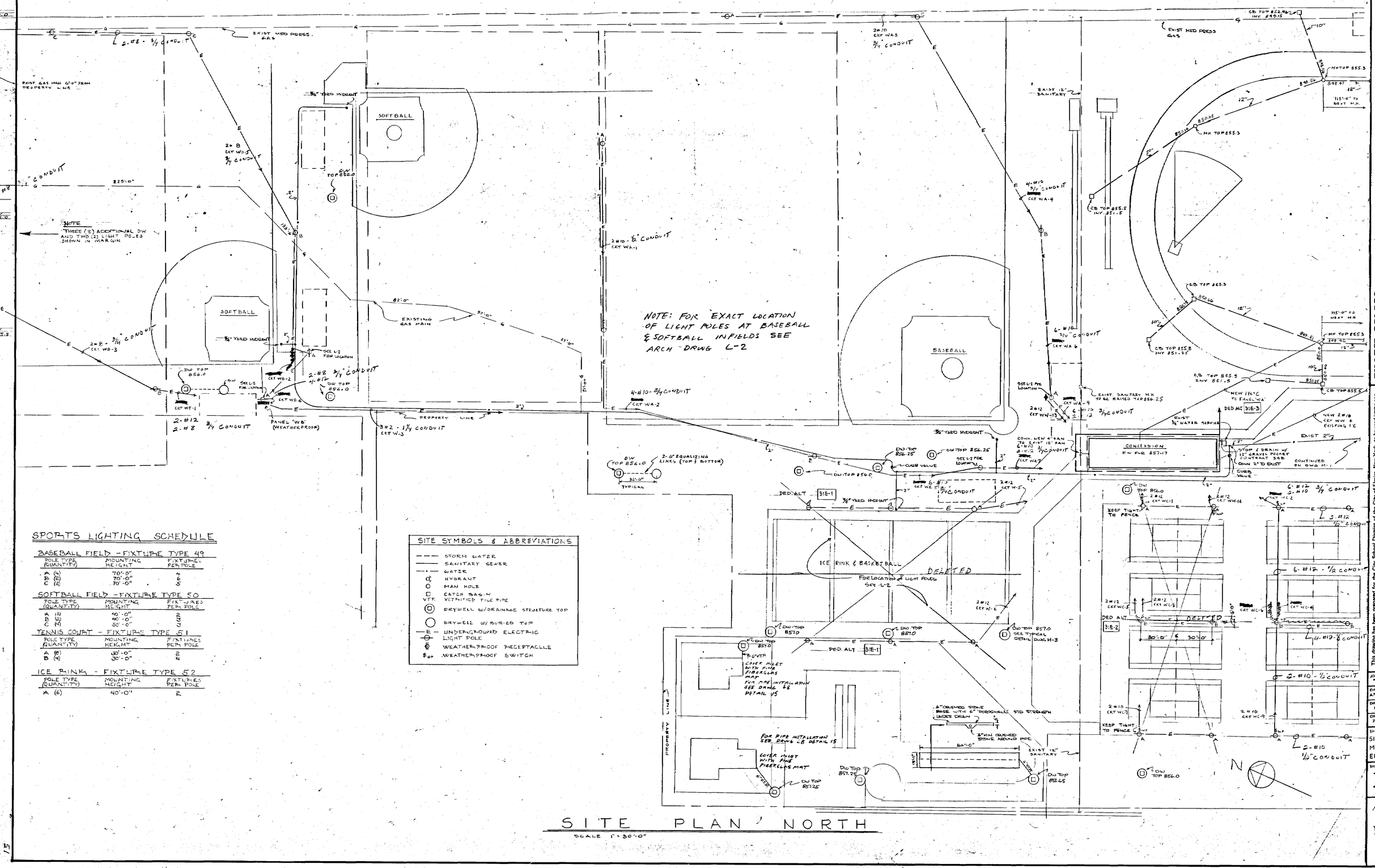
Very truly yours,

Harter Secrest & Emery LLP

Paul D. Sylvestri
DIRECT DIAL: 585.231.1194
EMAIL: PSYLVESTRI@HSELAW.COM

PDS:hlh
Enclosure
cc: T. Schneider, P.E., DEC
J. Stenerson, Esq., DEC
H. Austin, ECSD
K. Krueger, Unisys
E. Parker, Esq., Unisys
M. Murphy, Esq., B&D
P. Brookner, Geosyntec
J. Magliocca, ECSD
T. Johnson, Sterling
S. Cyr, Hunt

WARNING: IT IS A VIOLATION OF SECTION 7209, SUBDIVISION 2, OF THE NEW YORK STATE EDUCATION LAW FOR ANY PERSON UNLESS ACTING UNDER THE DIRECTION OF A LICENSED PROFESSIONAL ENGINEER TO ALTER, IN ANY WAY, ANY PLANS, SPECIFICATIONS OR REPORTS TO WHICH THE SEAL OF A PROFESSIONAL ENGINEER HAS BEEN APPLIED.



SITE PLAN NORTH

SCALE 1" = 30'-0"

SPORTS LIGHTING SCHEDULE

BASEBALL FIELD - FIXTURE TYPE 49

POLE TYPE (QUANTITY)	MOUNTING HEIGHT	FIXTURES PER POLE
A (4)	70'-0"	4
B (2)	70'-0"	4
C (2)	70'-0"	6

SOFTBALL FIELD - FIXTURE TYPE 50

POLE TYPE (QUANTITY)	MOUNTING HEIGHT	FIXTURES PER POLE
A (2)	40'-0"	2
B (2)	40'-0"	2
C (4)	50'-0"	4

TENNIS COURT - FIXTURE TYPE 51

POLE TYPE (QUANTITY)	MOUNTING HEIGHT	FIXTURES PER POLE
A (8)	30'-0"	2
B (4)	30'-0"	4

ICE RINK - FIXTURE TYPE 52

POLE TYPE (QUANTITY)	MOUNTING HEIGHT	FIXTURES PER POLE
A (6)	40'-0"	2

SITE SYMBOLS & ABBREVIATIONS

- STORM WATER
- SANITARY SEWER
- WATER
- HYDRANT
- MAN HOLE
- CATCH BASIN
- VTP VETRIFIED TILE PIPE
- DRYWELL W/DRAINAGE STRUCTURE TOP
- DRYWELL W/ BURIED TOP
- E UNDERGROUND ELECTRIC
- LIGHT POLE
- WEATHERPROOF RECEPTACLE
- WEATHERPROOF SWITCH

FANNING-ROWEY ASSOCIATES, INC.
ARCHITECTS ENGINEERS CONSULTANTS
100 EAST MARKET STREET, P.O. BOX 271, CELINA, OHIO 45822
100 NORTH STATE STREET, P.O. BOX 64, MINGO JCT., OHIO 43938

GILLUM-COLAGO
CONSULTING STRUCTURAL ENGINEERS
2 PARK AVENUE, NEW YORK, NEW YORK 10016

PERSONIUS WADSWORTH WOLTER
CONSULTING ENGINEERS
PO1 LEVEL ARGES DRIVE, POUGHKEEPSIE, NEW YORK 12603

KAMINSKY & SHIFFER ARCHITECTS PC
44 EAST 23RD STREET, NEW YORK, NEW YORK 10010

SOUTHSIDE

This drawing has been prepared for the City School District of the City of Elmira, New York, to be used in the construction of the Community Recreational Center and Educational Facility, Elmira, New York. This drawing is the property of Fanning/Rowey Associates, Inc. and is not to be used for any purpose other than the above described project at the location indicated herein.

JOB NO. 7604 B	REVISION
DATE APRIL 6, 77	
DRAWN MAC	
CHECKED FJM	

SHEET TITLE
SITE PLAN NORTH
MECHANICAL
ELECTRICAL

SHEET NO.
M-2d
OF

AS BUILT

PHASE VI

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

10211 Wincopin Circle, 4th Floor
Columbia, MD 20144
PH 410.381.4333
FAX 410.381.4499
www.geosyntec.com

1 November 2021

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

VIA ELECTRONIC MAIL

Subject: Revised Amendment #2
Interim Remedial Measure #5 Work Plan – Response to NYSDEC
Former Sperry Remington Site – North Portion (NYSDEC #c808022)
777 South Main Street
City of Elmira, Chemung County, NY

Dear Mr. Schneider:

On behalf of Unisys Corporation (Unisys), Geosyntec Consultants, Inc. and its New York engineering affiliate, B&B Engineers & Geologists of New York, P.C. (collectively, Geosyntec) is providing this response to the New York Department of Environmental Conservation (NYSDEC or Agency) 22 October 2021 letter documenting completion of its review of the "Revised Amendment #2 Interim Remedial Measure #5 Work Plan, Former Sperry Remington Site – North Portion #c808022" (Work Plan) submitted to the Agency on 8 October 2021. This letter also references the 19 October 2021 correspondence provided on the behalf of Elmira City School District (ECSD). Unisys has completed its initial review of the aforementioned NYSDEC letter and ECSD comments. Given the scope of the work and to avoid any confusion, Unisys requests a clarification teleconference be scheduled to ensure all parties understand "Approve as Modified" comments provided by the Agency. With that, we envision the following sequence of activities leading to a fully approved Amendment #2 Interim Remedial Measure #5 Work Plan:

1. Clarification teleconference – Unisys, Geosyntec, NYSDEC & Mactec technical representatives.

2. Unisys "Letter of Acceptance" or proposal for alternate solution relative to NYSDEC or ECSD comments, two (2) business days after the clarification teleconference. The Letter of Acceptance will provide a submittal date for a combined "Response to Comments" letter and revised Work Plan.

3. Cognizant that the clarification teleconference may yield issues not yet contemplated, nonetheless we anticipate submittal of the Response to Comments letter and revised Work Plan will be two (2) weeks after the clarification call.

Sincerely,

Geosyntec Consultants, Inc.

Paul Brookner
Principal/Project Director
Geosyntec Consultants, Inc.

Aron Krasnopoler, Ph.D., P.E.
Senior Engineer/Project Manager
B & B Engineers and Geologists of New York, P.C.

Copies to:

Dave Pratt NYSDEC
Justin Stenerson, NYSDEC
Michael Cruden, NYSDEC
Sara Bogardus, NYSDOH
Hillary Austin, ECSD
Joe Magliocca, ECSD

Kevin Krueger, Unisys
Terry Etter, Unisys
Elizabeth Parker, Unisys
Michael G. Murphy, Beveridge & Diamond
Paul Sylvestri, Harter Secrest & Emery

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

10211 Wincopin Circle, 4th Floor
Columbia, MD 20144
PH 410.381.4333
FAX 410.381.4499
www.geosyntec.com

9 November 2021

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

VIA ELECTRONIC MAIL

Subject: Revised Amendment #2
Interim Remedial Measure #5 Work Plan – Response to NYSDEC
Former Sperry Remington Site – North Portion (NYSDEC #c808022)
777 South Main Street
City of Elmira, Chemung County, NY

Dear Mr. Schneider:

On behalf of Unisys Corporation (Unisys), Geosyntec Consultants, Inc. and its New York engineering affiliate, B&B Engineers & Geologists of New York, P.C. (collectively, Geosyntec) is providing further response to the New York Department of Environmental Conservation (NYSDEC or Agency) 22 October 2021 letter documenting completion of its review of the "Revised Amendment #2 Interim Remedial Measure #5 Work Plan, Former Sperry Remington Site – North Portion #c808022" (Work Plan) submitted to the Agency on 8 October 2021.

Pursuant to Unisys correspondence provided to NYSDEC and New York State Department of Health (NYSDOH) on 1 November 2021 the following activities have been completed or are in process:

1. Clarification teleconference – Unisys, Geosyntec, NYSDEC & Mactec technical representatives.

    a. This call was completed on 4 November 2021

2. Unisys "Letter of Acceptance" or proposal for alternate solution relative to NYSDEC or ECSD comments, two (2) business days after the clarification teleconference. The Letter of Acceptance will provide a submittal date for a combined "Response to Comments" letter and revised Work Plan.

    a. This letter provides Unisys acknowledgement and acceptance of NYSDEC and NYSDOH comments and requests provided in the aforementioned 22 October 2021 correspondence.

3. Cognizant that the clarification teleconference may yield issues not yet contemplated, nonetheless we anticipate submittal of the Response to Comments letter and revised Work Plan will be two (2) weeks after the clarification call.

    a. A Response to Comments letter and revised Work Plan are in preparation and will be submitted to the agencies on 19 November 2021.

Sincerely,

Geosyntec Consultants, Inc.

Paul Brookner
Principal/Project Director
Geosyntec Consultants, Inc.

Aron Krasnopoler, Ph.D., P.E.
Senior Engineer/Project Manager
B & B Engineers and Geologists of New York, P.C.

Copies to:

Dave Pratt NYSDEC
Justin Stenerson, NYSDEC
Michael Cruden, NYSDEC
Sara Bogardus, NYSDOH
Hillary Austin, ECSD
Joe Magliocca, ECSD
Kevin Krueger, Unisys
Terry Etter, Unisys
Elizabeth Parker, Unisys
Michael G. Murphy, Beveridge & Diamond
Paul Sylvestri, Harter Secrest & Emery