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19 November 2021

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

VIA ELECTRONIC MAIL

Subject: Response to 22 October 2021 Approved as Modified
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. 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) are responding to the 22 October 2021 Approved as Modified by the New York State Department of Environmental Conservation (NYSDEC or Agency) of Interim Remedial Measure (IRM) #5 Work Plan, Amendment #2 (IRM #5WP, A2) for the Former Sperry Remington Site – North Portion (#c808022) (Site) in Elmira, New York. IRM #5WP, A2 was submitted to the New York State Department of Environmental Conservation (NYSDEC or Agency) on 8 October 2021.

A revised IRM #5WP, A2 is being submitted electronically to NYSDEC and ECSD on 19 November 2021. To facilitate the Agency review, the 13 November 2020 NYSDEC comments (shown in italics) that refer to items in the subject document determined to be incomplete, missing or require further clarification are presented below, followed by Unisys' response. Responses to "Comments to the October 8, 2021, Revised IRM #5 Work, Amendment #2, Site #c808022" provided by Elmira City School District (ECSD) on 19 October 2021 are provided under separate cover.

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.*

Acknowledged.

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.*

Acknowledged.

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

Acknowledged.

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.*

Contact information for Mr. Scott Sutton was distributed to project stakeholders in an email on 27 October 2021.

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.*

As discussed with the Agency on 28 October 2021, installation of temporary fencing, signage and locks was completed on 27 October 2021. The ECSD contractor will access the FFC from their laydown area in the EHS student parking lot or through the STRA area. Access via the VFW construction entrance will be coordinated with designated Traffic Coordinator. On-Site Agency oversight will be notified of planned ECSD contractor access to the FFC through the IRM 5 Amendment #2 LOD.

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.*

Contact information for Mr. Kyle Cunningham was distributed to project stakeholders via email on 27 October 2021.

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

Real-time functionality for CAMP operations was completed on 20 October 2021as discussed with the Agency on 21 October 2021.

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.*

A Temporary Infrastructure Decommissioning Plan for temporary haul roads on Norfolk Southern Property shall be submitted to address Comments #9 and #10 above. A deliverable milestone date is included in the updated IRM 5, Amendment #2 Project Schedule.

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.*

The Temporary Infrastructure Decommissioning Sampling Work Plan was submitted to NYSDEC and NYSDOH on 22 October 2021. Agency disapproval and comments were received on 15 November 2021 and a deliverable milestone date for resubmittal is included in the updated IRM 5, Amendment #2 Project Schedule.

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.*

Locations of IRM temporary infrastructure will be properly documented as requested by the Agency through recording of GPS coordinates and depiction on Site plans included in daily field reports. These reports and the Construction Completion Report will act as submittals to the Agency.

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.*

A step-out tracking spreadsheet was made available to the Agency via Microsoft Teams on 27 October 2021.

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.*

A subsurface structure tracking spreadsheet was made available to the Agency via Microsoft Teams on 11 November 2021. Unisys has received confirmation Agency representatives can access this information.

*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.*

Existing NAF MWs will be maintained as noted on the Construction Drawings. Decommissioning of MWs MW-50S, MW-50D and MW-52 is proposed as part of IRM #5, Amendment #2. An IRM contractor well decommissioning submittal will be submitted to the Agency for approval. A

Monitoring Well Decommissioning Plan will be submitted to the Agency to present a list of NAF monitoring wells proposed for removal and/or decommissioning. It will include monitoring well construction logs and a summary of previous groundwater COPC exceedances. A deliverable milestone date for the Monitoring Well Decommissioning Plan is included in the updated IRM 5, Amendment #2 Project Schedule.

A Groundwater Monitoring Well Network Update will be submitted to the Agency to present locations for long-term groundwater monitoring in the NAF include locations of replacement wells. A deliverable milestone date for the Groundwater Monitoring Well Network Update is included in the updated IRM 5, Amendment #2 Project Schedule.

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.*

Per the discussion with Agency oversight contractors on 10 November 2021, the revised IRM #5WP, A2 clarifies that investigation of NAF groundwater and soils below the water table are ongoing and will be documented as part of the RI. Missing information with respect to soil investigations in the vicinity of AOC-19, MW-57, and the Infiltration Area has been added. Results of the April 2021 NAF groundwater sampling event are included and discussed.

    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.*

Per the discussion with Agency oversight contractors on 10 November 2021, the revised IRM #5WP, A2 clarifies that further delineation of VOCs in deep soils in AOC-19 is ongoing in accordance with the Agency-approved sampling plan. The sampling plan for VOC delineation in AOC-19 was submitted for Agency review on 13 October 2021 and approved on 27 October 2021. Field work was completed on 1 November 2021 and results are pending.

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.*

As noted, updated drawings were provided by ECSD and the referenced dry well location has been added to the Construction Drawings and Figures 6A to 6F and will be designated as "to be removed".

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).*

The referenced structure has been added to the Construction Drawings and Figures 6A to 6F and will be designated as "to be removed by ECSD".

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).*

The referenced dry well location has been added to the Construction Drawings and Figures 6A to 6F and will be designated as "existing". It is our understanding that ECSD will retain this structure for stormwater management in the Shot and Discus Area.

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).*

The referenced dry well locations near the EHS maintenance shed have been added to the Construction Drawings and Figures 6A to 6F and will be designated as "location to be confirmed". The locations will be confirmed during IRM excavation in this area. If these dry wells are confirmed to be present, disposition will be determined in coordination with ECSD and NYSDEC.

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.

A Dry Well Soil Quality Sampling Plan will be submitted to address data gaps in COPC data with respect to existing and proposed dry wells and other infiltration structures that will be part of

stormwater management infrastructure in the NAF after final restoration. A deliverable milestone date for the Dry Well Soil Quality Sampling Plan is included in the updated IRM 5, Amendment #2 Project Schedule.

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.*

The Soil Cover Verification Sampling Work Plan was submitted to NYSDEC and NYSDOH on 22 October 2021. Agency disapproval and comments were received on 15 November 2021 and a deliverable milestone date for resubmittal is included in the updated IRM 5, Amendment #2 Project Schedule.

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.*

Figure 7, Drawing 22 and Drawing C4.0 have been revised to address the comments above. General cross sections are provided to describe soil cover components. Utilities and associated depths are presented in construction details.

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.*

Construction Drawings have been revised to address the comments above and are included in revised IRM 5WP, A2 submittal.

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.*

Drawing 22 has been revised to be consistent with Figure 7.

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.*

General cross-sections and construction details are included with Figure 7. Restoration cross-sections on Sheet 22 have been revised to note restoration by others (i.e., the ballfield restoration contractor or ECSD).

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.*

Siteone Sheet #IR-2 has been revised to show a demarcation layer on detail that indicate intrusive activities at a minimum depth of 24 inches.

H. Schedule

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

Deliverables dates for submittals noted above are included on Table 8 and the Project Construction Schedule (Attachment 7).

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.*

Discrepancies between Table 8 and the Project Construction Schedule (Attachment 7) have been corrected.

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.*

A Phase 3 Site Plan will be submitted with details for loading of material for off-Site transport and disposal via South Main Street. A deliverable milestone date for the Phase 3 Site Plan is included in the updated IRM 5, Amendment #2 Project Schedule.

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.*

A schedule milestone for turnover of Phase 3 to ECSD for Capital Improvements is included in the updated IRM 5, Amendment #2 Project Schedule. ISMP activities including required documentation sampling will be implemented in accordance with ISMP EWP notification for the Shot and Discus Area to be submitted by ECSD.

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

A deliverable milestone date for a revised Enhanced Community Liaison Plan is included in the updated IRM 5, Amendment #2 Project Schedule.

CLOSING

The revised text is provided in Microsoft® Word redline format with Track Changes for your use. Unisys looks forward to working with NYSDEC, NYSDOH and ECSD to complete this IRM. If you have any questions, please contact Mr. Kevin Krueger of Unisys at (651) 212-7273.

Sincerely,

B&B Engineers & Geologists of New York, P.C.

Paul Brookner
Senior Principal/Project Director

Aron Krasnopoler, Ph.D., P.E. (MD, NY)
Senior Engineer/Project Manager

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