

DRAFT

Appendix A Agency Approvals

Appendix A

Agency Approval Summary Sheet

Submittal	Type	Submittal Date	Approval Date	Related Media
Revised Site Characterization Work Plan	Work Plan	10/27/2014	12/2/2014	Soil/Groundwater
Short Term Response Action Work Plan	Work Plan	3/26/2015	3/26/2015	Soil
Site Characterization Data Report	Report	2/1/2015	6/2/2015	Soil/Groundwater
Addendum #1 to SCWP	Work Plan	5/22/2015	7/10/2015	Soil/Groundwater
Addendum #2 to SCWP	Work Plan	1/8/2016	2/11/2016	Soil/Groundwater
Addendum #3 to SCWP	Work Plan	8/9/2016	8/15/2016	Soil/Groundwater
Addendum #4 to SCWP	Work Plan	2/3/2017	2/8/2017	Soil/Groundwater
Addendum #5 to SCWP	Work Plan	3/16/2017	3/22/2017	Soil/Groundwater
IRM #1 WP	Work Plan	7/11/2017	8/10/2017	Soil
Amendment #1 to IRM #1 WP	Work Plan	8/9/2017	8/10/2017	Soil
IRM #2 PDI Workplan	Work Plan	12/3/2017	NA	Soil
Amendment #1 to IRM #2 PDI Workplan	Work Plan	2/23/2018	2/26/2018	Soil/Groundwater
Amendment #3 to IRM #2 PDI WP	Work Plan	5/18/2018	NA	Soil
Amendment #4 to IRM #2 PDI WP	Work Plan	6/4/2018	6/7/2018	Soil
Amendment #5 to IRM #2 PDI WP	Work Plan	6/14/2018	NA	Soil
SVIA Workplan	Work Plan	6/19/2018	6/21/2018	Vapor
Amendment #1 to IRM #2 WP	Work Plan	7/3/2018	NA	Soil
FFC RI/PDI Activities WP	Work Plan	7/17/2018	7/18/2018	Soil
Revised Final IRM #2 WP	Work Plan	7/13/2018	7/25/2018	Soil
Amendment #2 to IRM #2 PDI WP	Work Plan	7/17/2018	7/31/2018	Soil
Amendment #2 to IRM #2 WP	Work Plan	7/17/2018	7/31/2018	Soil
Site Characterization Report	Report	5/17/2017	8/15/2018	Soil/Groundwater
IRM SSDS Room 148 Work Plan	Work Plan	8/8/2018	8/17/2018	Vapor
Amendment #1 to FFC RI/PDI Activities WP	Work Plan	8/23/2018	NA	Soil
Amendment #2 to FFC RI/PDI Activities WP	Work Plan	10/12/2018	NA	Soil/Groundwater
Amendment #3 to IRM #2 WP	Work Plan	1/18/2019	NA	Soil
SVIA Report	Report	1/31/2019	3/4/2019; 3/19/2019	Vapor
Music Wing SSDS CCR	CCR	1/31/2019	3/4/2019; 3/19/2019	Vapor
Revised "Texas Area" Supplemental Sampling Plan	Work Plan	5/17/2019	4/19/2019	Soil
Amendment #3 to FFC RI/PDI Activities WP	Work Plan	5/7/2019	5/10/2019	Soil/Groundwater
Revised Final 2019 IRM WP	Work Plan	6/8/2019	6/13/2019	Soil
Revised Remedial Investigation Work Plan	Work Plan	5/29/2019	7/24/2019	Soil/Groundwater
Amendment #1 2019 IRM WP	Work Plan	7/9/2019	NA	Soil
Amendment #4 to FFC RI/PDI Activities WP	Work Plan	7/29/2019	8/8/2019	Soil/Groundwater
Amendment #2 2019 IRM WP	Work Plan	8/16/2019	8/22/2019	Soil
Remedial Investigation Work Plan Update	Work Plan	10/4/2019	NA	Soil/Groundwater
Interim Site Management Plan 2019	Site Management Plan	12/12/2019	12/20/2019	Soil
AOC18 Interim Report	Report	4/2/2020	4/2/2020	Soil
Amendment #5 to FFC RI/PDI Activities WP	Work Plan	5/4/2020	5/5/2020	Soil
RI WP Amendment #1	Work Plan	4/22/2020	5/27/2020	Soil
Final (100%) IRM #4 WP, revised	Work Plan	5/19/2020	5/28/2020	Soil
Amendment #6 to FFC RI/PDI Activities WP	Work Plan	7/22/2020	7/28/2020	Soil
Amendment #1 to Final IRM #4 WP, revised (IRM #4A)	Work Plan	9/8/2020	9/18/2020	Soil
FFC Pre-Design Investigation Data Report	Report	9/2/2020	10/22/2020	Soil
Final (100%) IRM #5 WP, revised	Work Plan	11/24/2020	12/4/2020	Soil
ISMP, Amendment #1, revised	Site Management Plan	12/18/2020	12/23/2020	Soil
Slide Rail Soil Investigation*	Work Plan	12/2/2020	12/23/2020	Soil
FFC TCE Soil Investigation*	Work Plan	1/20/2021	2/2/2021	Soil
Amendment #1 to Final IRM #5 WP (IRM #5A1)	Work Plan	2/11/2021	2/24/2021	Soil
Soil and Groundwater Investigation WP, FFC - Slide Rail	Work Plan	3/22/2021	3/26/2021	Soil/Groundwater
IRM #2 CCR	CCR	3/18/2019	4/30/2021	Soil
Soil and Groundwater Investigation WP Addendum, NAF	Work Plan	4/28/2021	5/11/2021	Soil/Groundwater
Soil and Groundwater Investigation WP, EHS Building Area	Work Plan	5/19/2021	5/26/2021	Soil/Groundwater
Completion Package, request to backfill	Request to backfill	5/27/2021	5/28/2021	Soil

Submittal	Type	Submittal Date	Approval Date	Related Media
Completion Package, request to backfill	Request to backfill	6/24/2021	6/28/2021	Soil
ISMP, Amendment #2	Site Management Plan	7/20/2021	7/21/2021	Soil
STRA Construction Approval	Work Plan	8/3/2021	8/4/2021	Soil
AOC-19 Soil Investigation Plan*	Work Plan	10/13/2021	10/21/2021	Soil
Amendment #2 to Final (100%) IRM #5 WP (IRM #5A2)	Work Plan	11/19/2021	12/14/2021	Soil
Revised Northern Athletic Field Dry Well Soil Quality Verification Work Plan	Work Plan	3/18/2022	4/28/2022	Soil
Revised Northern Athletic Field Well Decommissioning Plan	Work Plan	5/4/2022	5/25/2022	Soil
Groundwater Monitoring Network Update Plan	Work Plan	5/13/2022	6/9/2022	Groundwater
Amendment #3 to Final (100%) IRM #5 WP (IRM #5A3)	Work Plan	6/10/2022	7/1/2022	Soil
UST Removal Plan	Work Plan	8/16/2022	8/17/2022	Soil
Completion Package, notification to backfill "at risk"	Request to backfill	8/30/2022	8/30/2022	Soil
Soil and Groundwater Investigation WP, EHS Building Area -- Add. #2	Work Plan	1/19/2023	1/24/2023	Soil/Groundwater
Groundwater Monitoring Network Updates -- Add. #1	Work Plan	3/30/2023	4/4/2023	Groundwater
Groundwater Monitoring Network Update -- Add. #2	Work Plan	3/21/2023	4/4/2023	Groundwater
Pre-Construction Monitoring Program WP for Proposed Infiltration Gallery	Work Plan	3/31/2023	4/18/2023	Groundwater
Post-Construction Monitoring Program WP for Proposed IG	Work Plan	3/31/2023	4/20/2023	Groundwater
Groundwater Monitoring Network Update -- Add. #3	Work Plan	7/5/2023	7/20/2023	Groundwater
Addendum to the Northern Athletic Field Well Decommissioning Plan	Work Plan	7/5/2023	7/25/2023	Groundwater
Revised IG Pre-Construction Monitoring Report	Report	7/31/2023	8/2/2023	Groundwater
Revised Dry Well Soil Quality Verification Report, IRM #5A2	Report	7/14/2023	8/11/2023	Soil
NAF Well Decommissioning Technical Memo	Report	10/13/2023	11/17/2023	Groundwater
Dry Well DW-3B Soil Quality Verification Update	Report	11/22/2023	12/18/2023	Soil
2023 Heating Season Soil Vapor Intrusion Monitoring and Sampling Report	Report	1/31/2024	4/10/2024	Vapor
Dry Well Closure Plan Amendment #1	Work Plan	4/17/2024	4/19/2024	Soil
IRM #3 CCR	CCR	2/27/2024	5/17/2024	Soil
Groundwater Monitoring Network Update -- Add. #4	Work Plan	5/3/2024	5/29/2024	Groundwater
Revised IG Post-Construction Interim Monitoring Report 1	Report	4/26/2024	6/11/2024	Groundwater
Revised IG Post-Construction Interim Monitoring Report 2	Report	5/24/2024	7/31/2024	Groundwater
NAF West Soil Sampling Interim Data Report #2	Report	6/26/2024	12/11/2024	Soil
Soil and Groundwater Investigation WP, EHS Building Area -- Add. #4	Work Plan	7/26/2024	8/9/2024	Soil
Revised September 2023 GW Monitoring Event Interim Data Report	Report	7/23/2024	11/22/2024	Groundwater
Soil and Groundwater Investigation WP, EHS Building Area -- Add. #6	Work Plan	11/22/2024	12/6/2024	Soil
Revised Quality Assurance Project Plan (QAPP)/Field Sampling Plan (FSP)	QAPP/FSP	11/22/2024	12/6/2024	Soil/Groundwater
Revised April 2024 Groundwater Monitoring Event Interim Data Report	Report	3/17/2025	4/15/2025	Groundwater
IG Post-Construction Final Monitoring Report	Report	3/19/2025	4/15/2025	Groundwater
Offsite - Groundwater Monitoring Investigation Work Plan	Work Plan	4/29/2025	7/3/2025	Groundwater
Revised IRM #5A2 Corrective Measures Workplan	Work Plan	2/25/2026	2/27/2026	Soil
Revised IRM #5 Corrective Measures Workplan	Work Plan	3/10/2026	3/11/2026	Soil
Addendum #1 to Revised IRM #5A2 Corrective Measures Work Plan	Work Plan	3/4/2026	3/25/2026	Soil
Revised IRM #5A2 Corrective Measure Interim Data Report	Report	4/1/2026	5/22/2026	Soil
Revised IRM #5 Corrective Measures Interim Data Report	Report	5/7/2026	6/8/2026	Soil
Revised Northern Athletic Fields (NAF) CCR	CCR	6/19/2026	7/16/2026	Soil
Revised IRM #1 CCR	CCR	6/17/2026	7/24/2026	Soil
Revised FFC CCR	CCR	9/3/2026	9/29/2026	Soil

Notes:

Appendix includes available approvals received from NYSDEC and/or NYSDOH

Agency Approval Documents Unavailable. While the absence of these records limits direct verification of specific Agency determinations, the unavailable approval letters are not considered to materially affect the conclusions presented in the Remedial Investigation with the full involvement and awareness of the Agency.

*Investigation scope was electronically provided to NYSDEC via email. No work plan document was prepared.

New York State Department of Environmental Conservation
Division of Environmental Remediation, Region 8
6274 East Avon-Lima Road, Avon, New York 14414-9519
Phone: (585) 226-5353 • Fax: (585) 226-8139
Website: www.dec.ny.gov



Joe Martens
Commissioner

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

December 2, 2014

Re: Former Sperry Remington Site (#808022)
Site Characterization Work Plan
City Of Elmira, Chemung County, NY

Dear Mr. Krueger:

The Department has completed its review of the document entitled “**Site Characterization Work Plan**” submitted by Unisys in July 2014, last revised October 27, 2014 and has determined that the work plan, with the following clarifications, substantially addresses the requirements of the Superfund Order.

1. Table – 4 - AOC-9 – Oil House in former Building 54: The aerial and vertical extent of existing data for this AOC and down gradient area must be depicted in greater detail prior to the Department accepting the Proposed Action: “No further investigation”.
2. Table – 4 - AOC-2C – Drywell near Building 49: The aerial and vertical extent of existing data for this AOC and down gradient area must be depicted in greater detail and the characterization of this former structure documented consistent with DER-10 guidance prior to the Department accepting the Proposed Action: “No further investigation”.

With the understanding that the above noted clarifications will be addressed, the document is hereby accepted. This letter shall be attached to the final document and a copy of the approved document is required to be kept in the document repository.

As a reminder, all final documents and reports are to be in electronic format on compact computer discs (CDs). The disk should contain an Adobe® Acrobat® Portable Document Format (PDF) file and must be searchable. In addition, all data submitted to the DER must be in the DEC-approved Electronic Data Deliverable (EDD). Moreover, new data must be submitted on a continuous basis immediately after data validation occurs but in no event more than 90 days after the data has been submitted to the remedial party or its consultant(s). In other words, data is not to be held and submitted with the related reports.

If Unisys chooses not to address the clarifications noted by the Department, you are required to notify this office within 20 days after receipt of this letter. In this event I suggest a meeting be scheduled to discuss Unisys’ concerns prior to the end of this 20 day period.

We look forward to working together to complete this remedial investigation. If you have questions or concerns on this matter, please contact me.

Sincerely,

Timothy A. Schneider, P.E.
Environmental Engineer 2

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Division of Environmental Remediation, Region 8
6274 East Avon-Lima Road, Avon, NY 14414-9516
P: (585) 226-5353 | F: (585) 226-8139
www.dec.ny.gov

Via E-mail

May 25, 2022

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

**Re: Revised Northern Athletic Field Well Decommissioning Plan
Former Sperry Remington Site – North Portion (#c808022)
Elmira, New York (Elmira High School)**

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 Northern Athletic Well Decommissioning Plan, Former Sperry Remington Site – North Portion #c808022", dated May 4, 2022, and **Approve as Modified below:**

General

1. Approval is limited to proposed Existing Well Decommissioning activities only. Proposed New Monitoring Well locations will be reviewed/approved under separate submittals.
2. Agency comments dated 12/14/22, regarding Bis(2-ethylhexyl) phthalate have not been addressed and data has been omitted in revised figures. However, the proposal to further evaluate Bis(2-ethylhexyl) phthalate as an artifact of the sampling / analysis procedures in accordance with the work plan and approved Unisys QAPP is authorized to proceed.

Future submittals to the Agency must document results of the rinsate field blank to determine if observed Bis(2-ethylhexyl) phthalate concentrations in groundwater are site-related or the result of cross contamination associated with field or laboratory methods.

3. Table 6 – Please note current screening values of 10 parts per trillion (ppt.) for PFOA and PFOS are Maximum Contaminant Levels (MCLs) established by the Agency. Values of PFOA - 6.7ppt. and PFOS - 2.7 ppt. are proposed to be added to NYSDEC Division of Water Technical and Operation Guidance Series (TOGS) and are the suggested comparison criteria moving forward.



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Please elect in writing your acceptance of the Revised Northern Athletic Well Decommissioning Plan, Approved as Modified and provide a work plan calendar schedule. Additionally, a compiled final work plan, including schedule and this cover letter must be provided to the Agency and document repository prior to the commencement of work.

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

Sincerely,

A handwritten signature in blue ink, appearing to read 'Timothy Schneider', with a horizontal line underneath.

Timothy Schneider, P.E.

Professional Engineer 1

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

DRAFT

cc. P. Brookner A. Krasnopoler
B. Putzig M. Cruden B Conlon
D. Hettrick J. Deming

DRAFT

From: [Schneider, Timothy A \(DEC\)](#)
To: [haustin](#); [cthurnau@mail.nysed.gov](#)
Cc: [justin.deming](#); [Hetrick, Dawn \(HEALTH\)](#); [Noble, David T.](#); [mmurphy](#); [Putzig, Bart \(DEC\)](#); "John H. Paul"; [Krueger, Kevin D.](#); [michael.cruden](#); [Aron Krasnopoler](#); [Paul Brookner](#); "Mike Dunn"; "Conrad Wolan"; [Aaron Alsheimer \(aalsheimer@saylesevans.com\)](#)
Subject: EHS Notice of Short Term Response Action Work Plan for Elmira High School
Date: Thursday, March 26, 2015 4:40:06 PM
Attachments: [image001.png](#)
[image002.png](#)
[Figure 1 - Proposed Actions.pdf](#)
[EHS Communication Regarding Unisys Short Term Response Action.pdf](#)

Dear Superintendent Austin,

Pursuant to our recent meetings, Unisys and the Department are in agreement with language for a Short Term Response Action Work Plan scheduled to begin at the EHS on Sunday March 29th, 2015.

As was also discussed at that meeting, the Department requires the District to give description and notice of these activities to the EHS community prior to Unisys mobilization.

Attached please find summary documents prepared by Unisys and the Department to be noticed and or posted to the EHS website.

I will not be available tomorrow, so if you have any questions, please contact Bart Putzig at 585-226-5349 or email bart.putzig@dec.ny.gov.

Sincerely,

Timothy A. Schneider P.E.

Environmental Engineer 2, Division of Environmental Remediation

New York State Department of Environmental Conservation

Address, City, NY Zip Code

P: (585) 226-5480 | F: (585) 226-8139 | timothy.schneider@dec.ny.gov

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

June 2, 2015

Re: Former Sperry Remington Site – North Portion (#808022)
Site Characterization Data Report
City Of Elmira, Chemung County, NY

Dear Mr. Krueger:

The Department has completed its review of the document entitled “Site Characterization Data Report” submitted by Unisys in February 2015 and has determined that the data report, with modifications, substantially addresses the requirements of the Superfund Order. The modifications are outlined as follows:

1. Detailed figures depicting soil results for PCBs, Metals and SVOCs for each sampling interval should be prepared.
2. Please remove report narrative related to SCO exceedances as a percentage total samples.
3. Please identify that site characterization data is being compared to values **consistent** with soil cleanup objectives (SCOs) published in Part 375 for restricted residential site use and remove tables and labels using the term SCOs (or foot note appropriately). Program specific SCOs for this site will be developed as part of the final site remedy.
4. Please appropriately refer to the EMP as a voluntary action undertaken by the ECSD. The EMP will remain in effect until a final remedy for the site is implemented. A Site Management Plan may be an element of the final remedy.
5. Please address the findings of the Sanitary Sewer inspection.
6. Table 2 – see highlighted markup.
7. Table 6 – add Screen / Bottom Elevation and Geoprobe GW sampling elevations.
8. Figure 4 – see highlighted / annotated markup.
9. Please include soil boring logs for shallow sampling (football field, grandstand etc)
10. Please depict locations of visually impacted soils, ash/debris/waste, clay or dense formations, refusal and recorded PID impacts.
11. Please depict locations of visual and olfactory impacted gw (LNAP, sheen, odor)
12. Generalized site wide cross-sections are unhelpful to determine if additional characterization or investigation is needed. In addition, more detailed information and appropriate scaling should be undertaken in future submissions. Please provide cross-section depictions that are AOC specific or impact driven.
13. Please explain the DUSR report of reextraction and reanalysis of SSHS-FB7-SUB-2-3 and the revision of PCB results.



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Based on the compiled site data, the following will be required:

14. Further characterization of soil vapor contaminant sources for all areas requiring SVI mitigation.
15. Further characterization and delineation of PCBs, metals and SVOCs in surface and subsurface soils.
16. Further characterization and delineation of PCBs in GW.
17. Further characterization and delineation of VOCs in GW (F-Wing & MW-30 / MWD).
18. Further characterization of intermediate depth GW.
19. Further characterization of Pre 1979 sewer east / north and west under school.
20. Characterization of sewer fine grained material and releases from breaks.
21. Characterization of Drywell SE corner of Baseball Field and SE corner of property.
22. Characterization of industrial structures east of the fence behind the bleachers.
23. Further characterization of hazardous / plating waste area identified during cafeteria expansion.
24. Please identify in table form, the contaminants detected in the investigation derived waste solid and liquid.

With the understanding that the above noted modifications revisions are agreed to, the document is hereby accepted. This letter shall be attached to the final revised document and a copy of the approved document is required to be kept in the document repository and the draft document removed.

As a reminder, all final documents and reports are to be in electronic format on compact computer discs (CDs). The disk should contain an Adobe® Acrobat® Portable Document Format (PDF) file and must be searchable. In addition, all data submitted to the DER must be in the DEC-approved Electronic Data Deliverable (EDD). Moreover, new data must be submitted on a continuous basis immediately after data validation occurs but in no event more than 90 days after the data has been submitted to the remedial party or its consultant(s). In other words, data is not to be held and submitted with the related reports.

If Unisys chooses not to address the clarifications noted by the Department, you are required to notify this office within 20 days after receipt of this letter. In this event I suggest a meeting be scheduled to discuss Unisys' concerns prior to the end of this 20 day period.

We look forward to working together to complete this site characterization. If you have questions or concerns on this matter, please contact me.

Sincerely,



Digitally signed by Timothy A. Schneider
DN: cn=Timothy A. Schneider, o=NYSDEC,
ou=DER, email=timothy.schneider@dec.ny.gov,
c=US
Date: 2015.06.02 16:16:05 -04'00'

Timothy A. Schneider, P.E.
Environmental Engineer 2

cc. P. Brookner A. Krasnopoler
B. Putzig M. Cruden B Conlon
D. Hettrick J. Deming
C. Thurnau

From: Schneider, Timothy A (DEC) <timothy.schneider@dec.ny.gov>
Sent: Friday, July 10, 2015 9:13 AM
To: Paul Brookner
Cc: Kevin Krueger (Kevin.Krueger@unisys.com); Aron Krasnopoler; Adam Gray; Cruden, Michael (DEC); Conlon, Benjamin (DEC); Putzig, Bart X (DEC)
Subject: RE: EHS Field Work

Hi Paul,

My same sentiments to you and Kevin on the meeting.

I plan on being onsite about 9:30 am on Monday and look forward to seeing Adam again.

I hope to be able to look closer at the proposal before I get down there Monday, but I will assume Adam has specific coordinates to field locate some of the target specific sampling points that were generally proposed (sewer breaks etc.).

Regards,

Tim

From: Paul Brookner [mailto:PBrookner@Geosyntec.com]
Sent: Friday, July 10, 2015 8:31 AM
To: Schneider, Timothy A (DEC)
Cc: Kevin Krueger (Kevin.Krueger@unisys.com); Aron Krasnopoler; Adam Gray
Subject: EHS Field Work

Good Morning Tim,

Once again, great work last evening as I thought the meeting went well and was successful in getting the information out to the public. I wanted to follow up with you on the impending field work at EHS which is scheduled to begin this coming Monday, July 13th. Unless you have any objections we intend to begin the work on Monday morning.

Please feel free to contact Adam Gray who will be coordinating the start of this field effort. Adam can be reached in the field on his cell phone at 301-379-0933.

Thanks,
Paul

Paul L Brookner, MBA, P.G.

Associate

Geosyntec Consultants, Inc.

100 Washington Avenue S, Suite 1590

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DRAFT

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

February 11, 2016

Re: Former Sperry Remington Site – North Portion (#808022)
Site Characterization Work Plan – Addendum #2
City Of Elmira, Chemung County, NY

Dear Mr. Krueger:

The Department has completed its review of the document entitled "Site Characterization Work Plan Addendum #2" submitted by Unisys in January 8, 2016 and has determined that the work plan addendum, with the following comments and suggested modifications addresses the requirements of the Site Characterization Order.

1. The proposed additional delineation of PCBs in soils is consistent with the Site Characterization Work Plan Addendum #1.
2. Surface soil samples should be collected in the soil/grass cover areas south of the rear parking lot.
3. If site characterization sampling results are intended to be utilized for predetermining limits of remedial excavation / confirmatory samples, the following advice should be considered:
 - a. Sample locations should be located approximately every 30 In ft along the perimeter of an excavation with locations bias towards contamination.
 - b. A sample location for every 900 sqft of excavation bottom should located bias to contamination.
 - c. For areas of the site where SVOCs & Metals are potential COCs, additional analyses should be added.
4. The Department declines further discussion or evaluation of Addendum #2 section on the Former Combined Industrial Sewer until more detailed information can be obtained.
5. The Department suggests that proposed monitoring wells intended to evaluate the applicability of the Protection of Groundwater Soil Cleanup Objectives be bias toward contamination or co-located with potential soil source areas or structures where releases could have occurred (dry wells, industrial sewer etc). Intermediate depth groundwater characterization for site COCs including PCBs should also be considered.
6. Please specify the type of particulate filter that will be used in the collection of filtered groundwater samples. Particulate filters such as activated carbon or others that promote the adsorption of particulate should be avoided. The Department will evaluate both filtered and unfiltered analytic results.



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With the understanding that the above comments and suggestions are understood and addressed moving forward, notice to proceed is granted. This letter shall be attached to the final document and a copy of the approved document is required to be kept in the document repository.

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If Unisys chooses not to address the comments and suggestions noted by the Department, you are required to notify this office within 20 days after receipt of this letter. In this event I suggest a meeting be scheduled to discuss Unisys' concerns prior to the end of this 20 day period.

We look forward to working together to complete this remedial investigation. If you have questions or concerns on this matter, please contact me.

Sincerely,

Timothy A. Schneider, P.E.
Environmental Engineer 2

cc. P. Brookner A. Krasnopoler
B. Putzig M. Cruden B Conlon
D. Hettrick J. Deming

From: Schneider, Timothy A (DEC) <timothy.schneider@dec.ny.gov>
Sent: Monday, August 15, 2016 4:05 PM
To: Aron Krasnopoler; 'Kevin Krueger (Kevin.Krueger@unisys.com)'; Paul Brookner
Cc: Schilling, Bernette (DEC); Hettrick, Dawn E. (HEALTH); Conlon, Benjamin (DEC); Cruden, Michael (DEC); Deming, Justin H (HEALTH)
Subject: RE: NYSDEC Site No. 808022 – Site Characterization Work Plan Addendum #3 and Final Cover Sampling Plan (Agency Review Draft)

Hi Aron,

As a follow-up to your phone message and continued review of Addendum #3, you are granted notice to proceed with the installation of proposed monitoring wells as shown on figure 4 in addition to the sampling of fine grained material found in sewer structures.

Regards,

Tim

From: Schneider, Timothy A (DEC)
Sent: Thursday, August 11, 2016 12:58 PM
To: 'Aron Krasnopoler'; 'Kevin Krueger (Kevin.Krueger@unisys.com)'; Paul Brookner
Cc: Schilling, Bernette (DEC); Hettrick, Dawn E. (HEALTH); Conlon, Benjamin (DEC); Cruden, Michael (DEC); Deming, Justin H (HEALTH)
Subject: RE: NYSDEC Site No. 808022 – Site Characterization Work Plan Addendum #3 and Final Cover Sampling Plan (Agency Review Draft)

Hi Aron,

As we spoke yesterday, I have had a brief look at the proposed SCWP Addendum #3 received on Tuesday and need more time to review and approve the document.

To assist in the advancement of your proposed schedule, I can grant you notice to proceed with utility clearance and proposed PCB delineation as depicted in Figures 5, 6, 9-12.

Please see yellow oval on attached Figure 7 markup, if I am understanding the sampling rationale correctly, please explain why PAH characterization sampling is not proposed for this area.

I will try to complete the document review early next week.

Regards,

Tim

Timothy A. Schneider P.E.

Environmental Engineer 2, Division of Environmental Remediation

New York State Department of Environmental Conservation

Address, City, NY Zip Code

P: (585) 226-5480 | F: (585) 226-8139 | timothy.schneider@dec.ny.gov

www.dec.ny.gov |  

From: Aron Krasnopoler [<mailto:AKrasnopoler@Geosyntec.com>]

Sent: Tuesday, August 09, 2016 2:57 PM

To: Schilling, Bernette (DEC) <bernette.schilling@dec.ny.gov>; Hettrick, Dawn E. (HEALTH) <dawn.hettrick@health.ny.gov>; Conlon, Benjamin (DEC) <benjamin.conlon@dec.ny.gov>; Schneider, Timothy A (DEC) <timothy.schneider@dec.ny.gov>; Cruden, Michael (DEC) <michael.cruden@dec.ny.gov>; Deming, Justin H (HEALTH) <justin.deming@health.ny.gov>

Subject: NYSDEC Site No. 808022 – Site Characterization Work Plan Addendum #3 and Final Cover Sampling Plan (Agency Review Draft)

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[workplan.hw808022.2016-08-09.FinalCoverSamplingPlan.pdf](#) (2.0 MB)

[workplan.hw808022.2016-08-09.SCWPAdd3.pdf](#) (6.0 MB)

[workplan.hw808022.2016-08-09.SCWPAdd3_Attachments.pdf](#) (9.5 MB)

Click the links above or visit the [pick-up portal](#) for batch retrieval.

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On behalf of Unisys Corporation (Unisys), please find instructions below on how to access Site Characterization Work Plan Addendum #3 and a Final Cover Sampling Plan for the Former Sperry Remington Site – North Portion (NYSDEC No. 808022). Files available for download include:

workplan.hw808022.2016-08-08.SCWPAdd3.pdf – Site Characterization Work Plan Addendum #3 text, figures and tables

workplan.hw808022.2016-08-08.SCWPAdd3_Attachments.pdf – Site Characterization Work Plan Addendum #3 attachments

workplan.hw808022.2016-08-08.FinalCoverSamplingPlan.pdf – Final Cover Sampling Plan text, figures and tables (no attachments).

Best Regards,
Aron Krasnopoler

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Division of Environmental Remediation, Region 8
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February 8, 2017

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

Via Email – kevin.krueger@unisys.com

**Re: Site Characterization Work Plan Addendum #4
Former Sperry Remington Site - North Portion (808022)
Elmira (C), Chemung (Co)**

Dear Mr. Krueger,

The New York State Department of Environmental Conservation and the New York State Department of Health has reviewed the Site Characterization Work Plan Addendum #4 last revised February 3, 2017. The plan is accepted with the following comments, modifications or additions:

1. Background
 - BCP status should be updated
2. Delineation of PCBs in Soils
 - Where PCBs in soil may contact groundwater, concentrations will be compared to the Protection of Groundwater SCO for total PCBs of 3.2 mg/kg.
 - Table 7 does not include the minimum number of bottom samples required.
3. Schedule and Deliverables
 - The evaluation of PCBs in groundwater is not part of addendum #4
 - The updated work plan schedule, Attachment 4, has not been included with this addendum.
4. Figure 4
 - PCB concentration range color assignments should be consistent for all figures.
 - PCB concentrations documented in fine grained material located within sewer structures should not be shown on this figure.
5. Figures 6 through 12 - Proposed Bottom Area Sampling
 - Identified bottom areas 1, 4, 5, 7 and 13 do not depict a minimum of 1 sample per 900 square feet sampling frequency.



Department of
Environmental
Conservation

Kevin Krueger, P.E.
February 8, 2017

Please update the work plan or attach this letter to the work plan and provide Attachment 4, work plan schedule as soon as possible.

If you have any questions regarding this letter or I can be of further assistance, please contact me at timothy.schneider@dec.ny.gov or (585) 226-5480.

Sincerely,

Timothy A. Schneider, P.E.
Environmental Engineer 2
Division of Environmental Remediation

ec: A. Krasnopoler / P. Brookner, Geosyntec
B. Schilling, P.E., NYSDEC
M. Cruden, P.E., NYSDEC
B. Conlon, NYSDEC
D. Hettrick, P.E., NYSDOH
J. Deming, NYSDOH
H. Austin / M. Dunn ECSD
R. Groff SED

From: Schneider, Timothy A (DEC) <timothy.schneider@dec.ny.gov>
Sent: Wednesday, March 22, 2017 4:38 PM
To: Aron Krasnopoler; Schilling, Bernette (DEC); Hettrick, Dawn E (HEALTH); Conlon, Benjamin (DEC); Cruden, Michael (DEC); Deming, Justin H (HEALTH); 'Mike Dunn'; haustin@elmiracityschools.com; Kevin.Krueger@unisys.com; Paul Brookner; Williams, Scott F (DEC); Long, Robert (DEC)
Subject: RE: NYSDEC Site No. 808022 – Site Characterization Work Plan Addendum #5 (Agency Review Draft)

Hi Aron,

Thank you for your responses, the Department clarifies the following:

1. Unisys is required to delineate the nature and extent of contamination both on-site and off-site. This requirement is not limited in depth due to water table or laterally due to ground cover as your proposal and responses imply.
2. Failure to fully delineate the extent of contamination prior to an IRM may require additional remedial action after the IRM is completed. This would be contrary to the objectives Unisys has expressed for some time now.
3. The required number of bottom samples were not added to Table 2 and the tables on figures 3-9 are not consistent in content to Table 2 as requested by the Department.
4. The bottom area identified on Table 2 - Label 3 is an estimated area and is not based on existing data or data to be collected during this work plan. The required number of bottom samples is unknown at this time and will be based on data yet to be collected. Table 2 should reflect this fact.
5. Additional delineation of surface soils in excess of 1 ppm and response actions are expected to be addressed in the proposed IRM or in a separate document delivered to the Department by April 1, 2017.

If you have any questions feel free to contact me.

Timothy A. Schneider P.E.

Professional Engineer 2, Division of Environmental Remediation

New York State Department of Environmental Conservation

6274 East Avon-Lima Road, Avon, NY 14414

P: (585) 226-5480 | F: (585) 226-8139 | timothy.schneider@dec.ny.gov

www.dec.ny.gov |  | 

From: Aron Krasnopoler [mailto:AKrasnopoler@Geosyntec.com]
Sent: Wednesday, March 22, 2017 7:46 AM
To: Schneider, Timothy A (DEC) <timothy.schneider@dec.ny.gov>; Schilling, Bernette (DEC) <bernette.schilling@dec.ny.gov>; Hettrick, Dawn E (HEALTH) <dawn.hettrick@health.ny.gov>; Conlon, Benjamin (DEC) <benjamin.conlon@dec.ny.gov>; Cruden, Michael (DEC) <michael.cruden@dec.ny.gov>; Deming, Justin H (HEALTH) <justin.deming@health.ny.gov>; 'Mike Dunn' <mdunn@elmiracityschools.com>; haustin@elmiracityschools.com; Kevin.Krueger@unisys.com; Paul Brookner <PBrookner@Geosyntec.com>; Williams, Scott F (DEC) <Scott.Williams@dec.ny.gov>; Long, Robert (DEC) <robert.long@dec.ny.gov>
Subject: RE: NYSDEC Site No. 808022 – Site Characterization Work Plan Addendum #5 (Agency Review Draft)

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Dear Tim,

Please see our responses to your comments below. Work plan tables and figures are attached for your review. We are available to discuss with you further at your convenience.

Sincerely,
Aron Krasnopoler

Aron Krasnopoler, Ph. D., P.E.
Project Engineer

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Columbia, MD 21044
Phone: 410-381-4333
Fax: 410-381-4499
Mobile: 202-550-7724
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From: Schneider, Timothy A (DEC) [mailto:timothy.schneider@dec.ny.gov]
Sent: Friday, March 17, 2017 2:30 PM
To: Aron Krasnopoler <AKrasnopoler@Geosyntec.com>; Schilling, Bernette (DEC) <bernette.schilling@dec.ny.gov>; Hettrick, Dawn E (HEALTH) <dawn.hettrick@health.ny.gov>; Conlon, Benjamin (DEC) <benjamin.conlon@dec.ny.gov>; Cruden, Michael (DEC) <michael.cruden@dec.ny.gov>; Deming, Justin H (HEALTH) <justin.deming@health.ny.gov>; 'Mike Dunn' <mdunn@elmiracityschools.com>; haustin@elmiracityschools.com; Kevin.Krueger@unisys.com; Paul Brookner <PBrookner@Geosyntec.com>; Williams, Scott F (DEC) <Scott.Williams@dec.ny.gov>; Long, Robert (DEC) <robert.long@dec.ny.gov>
Subject: RE: NYSDEC Site No. 808022 – Site Characterization Work Plan Addendum #5 (Agency Review Draft)

Hi Aron,

I have completed a very brief review of the work plan we received this morning and offer the following comments:

1. Insufficient sampling has been proposed to meet the criteria for predetermined excavation limits in the tennis court area. The work plan acknowledges that additional confirmatory samples may be collected during the IRM. **The Department is concerned that the proposed approach will delay the clearance of this area for the ECSD capital improvement project.** To avoid these delays the Department requests the frequency of sampling be made consistent with the established criteria, and other proposed sampling in this work plan.

As discussed in our prior telephone calls, access for sampling below the tennis courts is limited by the need for asbestos abatement in this area. Unisys will complete sampling at a frequency consistent with established criteria after asbestos abatement and tennis court demolition by ECSD in early May 2017. Unisys continues to coordinate investigation, IRM Design activities and scheduling with ECSD. These steps should not delay clearance of the tennis court area for ECSD capital improvements.

2. Where PCB contamination may be in contact with groundwater, the extent PCB contamination will be delineated to 3.2 ppm **laterally and vertically** unless groundwater data indicates no PCB impact. The work plan does not propose sufficient sampling to meet the criteria for predetermined excavation limits. **The Department is concerned that this proposal will delay the clearance of this area for the ECSD capital improvement project.**

The lateral extent of total PCB concentrations in soil above the Protection of Groundwater SCO of 3.2 ppm have been delineated around monitoring well MW-15S where PCB concentrations of 0.48 ug/L have been detected above groundwater standards of 0.09 ug/L. Figure 9 showing total PCB concentrations at the 14-16 ft bgs interval has been modified to show comparison to the 3.2 ppm screening level.

The lateral extent of total PCB concentrations above the Groundwater Protection SCO of 3.2 ppm has also been defined within the limits of the proposed IRM for 2017 between the school building and the running track. Vertical delineation is not necessary because proposed excavations below 14 ft bgs will continue to the water table. Depth to groundwater is approximately 17 ft bgs in these areas, approximately one (1) foot below our current data set. The IRM Design will propose excavation to the water table, therefore, not delaying clearance of this area for ECSD capital improvements.

PCBs in soil and groundwater data from both areas indicate a localized source that extends vertically to the water table. The IRM Work Plan and Design will recommend removal of these source areas to the water table. The IRM will also note that institutional controls on the use of groundwater already exist for the Site and will continue into the future. Once IRM construction activities have been completed and source areas removed it is anticipated that groundwater quality will improve over time. This will be demonstrated by groundwater monitoring following IRM construction as part of the remedial program for the Site.

3. The required number of bottom wall confirmatory samples are not identified on the Figures or in Table 2. The Department requests that a complete table including required number of samples be appropriately included on each of the Figures.

The number of required bottom wall confirmatory samples will be added to the tables shown on Figures 3 through 9.

4. Please provide a Data Table with the results from Addendum #4.

A data table with results from Addendum #4 was provided on 20 March 2017.

5. Table 2 – Label 3 bottom area is not yet delineated

The area of Label 3 bottom area is 889 square feet as shown on Figure 3. The one (1) historic samples meets the requirement of one (1) sampler per 900 square feet. The bottom area on Table 2 for Label 3 has been corrected.

6. Table 2 - Labels 8-11 do not match Figures

Table 2 has been revised to include Label 9 bottom area shown on Figure 6. Two (2) bottom wall samples are proposed at previously proposed borings SSHS-B701 and SSHS-B715. Figure 6 has been revised to show those samples.

7. For all areas not meeting the 1 sample in 900 sf bottom wall confirmatory sampling criteria, the Department reserves the right to request additional sampling during the IRM.

Noted. Confirmatory sampling criteria will be included in the IRM Work Plan.

8. Additional surface soil delineation of SSHS-B614 and SSHS-B601 will be required.

Noted. SSHS-B614 is located on the football field. SSHS-B601 is located east of the gymnasium. Additional surface soil delineation will be conducted during future investigations of the football field and the area east of the gymnasium. Unisys will work with ECSD to confirm that adequate vegetative cover is present in those areas.

With the understanding that the above concerns will be addressed and that the limitations of this work plan may cause delays in clearance of the area for ECSD summer work, notice to proceed is granted.

Best Regards,

Timothy A. Schneider P.E.

Professional Engineer 2, Division of Environmental Remediation

New York State Department of Environmental Conservation

6274 East Avon-Lima Road, Avon, NY 14414

P: (585) 226-5480 | F: (585) 226-8139 | timothy.schneider@dec.ny.gov

www.dec.ny.gov |  | 

From: Aron Krasnopoler [<mailto:AKrasnopoler@Geosyntec.com>]

Sent: Thursday, March 16, 2017 10:35 PM

To: Schilling, Bernette (DEC) <bernette.schilling@dec.ny.gov>; Hettrick, Dawn E (HEALTH) <dawn.hettrick@health.ny.gov>; Conlon, Benjamin (DEC) <benjamin.conlon@dec.ny.gov>; Schneider, Timothy A (DEC) <timothy.schneider@dec.ny.gov>; Cruden, Michael (DEC) <michael.cruden@dec.ny.gov>; Deming, Justin H (HEALTH) <justin.deming@health.ny.gov>

Subject: NYSDEC Site No. 808022 – Site Characterization Work Plan Addendum #5 (Agency Review Draft)

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On behalf of Unisys Corporation (Unisys), please find instructions below on how to access Site Characterization Work Plan Addendum #5 for the Former Sperry Remington Site – North Portion (NYSDEC No.808022).

Best Regards,
Aron Krasnopoler

On behalf of Unisys Corporation (Unisys), please find instructions below on how to access Site Characterization Work Plan Addendum #5 for the Former Sperry Remington Site – North Portion (NYSDEC No.808022).

Best Regards,
Aron Krasnopoler

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Division of Environmental Remediation, Region 8
6274 East Avon-Lima Road, Avon, NY 14414-9516
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Via E-mail

August 10, 2017

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

Dear Mr. Krueger:

**Re: Interim Remedial Measures Work Plan - Amendment
Former Sperry Remington Site #c808022
Elmira, Chemung County**

The New York State Department of Environmental Conservation (NYSDEC) has completed the review of "Interim Remedial Measures Work Plan – Amendment #2" for the Former Sperry Remington – North Portion Site #c808022, last revised August 9, 2017 and approve the work plan amendment contingent upon the following:

1. The Amendment is appropriately renamed Amendment #1.
2. Approval of work plan modifications to Material Storage Area (MSA) management techniques and time duration are contingent upon Southern Tier Commerce Center approval.
3. Written NYSDEC approval to consolidate windrows will be required.
4. Community air monitoring will continue during amendment activities.

This letter shall be attached to the revised IRM Work Plan Amendment #1 and a hard copy is required to be kept in the document repository and one sent to NYSDEC.

Additional NYS Department of Health comments, if any, will be transmitted directly.

As a reminder, all final documents and reports are to be in electronic format on compact computer discs (CDs). The disk should contain an Adobe® Acrobat® Portable Document Format (PDF) file and must be searchable. In addition, all data submitted to the DER must be in the DEC-approved Electronic Data Deliverable (EDD). Moreover, new data must be submitted on a continuous basis immediately after data validation occurs but in no event more than 90 days after the data has been submitted to the remedial party or its consultant(s). In other words, data is not to be held and submitted with the related reports.

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
B. Schilling
M. Cruden
B. Conlon
D. Hettrick
J. Deming
A. Meinstein

DRAFT

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Division of Environmental Remediation, Region 8
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Via E-mail

August 10, 2017

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

Dear Mr. Krueger:

**Re: Interim Remedial Measures Work Plan
Former Sperry Remington Site #c808022
Elmira, Chemung County**

The New York State Department of Environmental Conservation (NYSDEC) and the New York State Department of Health have completed the review of "Interim Remedial Measures Work Plan" for the Former Sperry Remington – North Portion Site #c808022, last revised July 11, 2017 and approve the work plan contingent upon the following:

1. Low recovery pre-excavation delineation samples will be recollected in-situ or confirmatory excavation samples will be required.

This letter shall be attached to the revised IRM Work Plan and a hard copy is required to be kept in the document repository and one sent to NYSDEC.

As a reminder, all final documents and reports are to be in electronic format on compact computer discs (CDs). The disk should contain an Adobe® Acrobat® Portable Document Format (PDF) file and must be searchable. In addition, all data submitted to the DER must be in the DEC-approved Electronic Data Deliverable (EDD). Moreover, new data must be submitted on a continuous basis immediately after data validation occurs but in no event more than 90 days after the data has been submitted to the remedial party or its consultant(s). In other words, data is not to be held and submitted with the related reports.

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

Sincerely,



Digitally signed by Timothy A. Schneider
DN: cn=Timothy A. Schneider, o=NYSDEC,
ou=DER,
email=timothy.schneider@dec.ny.gov, c=US
Date: 2017.08.10 10:46:34 -04'00'

Timothy Schneider, P.E.
Professional Engineer 1



Department of
Environmental
Conservation

P. Brookner
A. Krasnoper
B. Schilling
M. Cruden
B. Conlon
D. Hettrick
J. Deming

DRAFT

From: Schneider, Timothy A (DEC) [<mailto:timothy.schneider@dec.ny.gov>]

Sent: Monday, February 26, 2018 12:48 PM

To: Aron Krasnopoler <AKrasnopoler@Geosyntec.com>; Schilling, Bernette (DEC) <bernette.schilling@dec.ny.gov>; Hettrick, Dawn E (HEALTH) <dawn.hettrick@health.ny.gov>; Conlon, Benjamin (DEC) <benjamin.conlon@dec.ny.gov>; Cruden, Michael (DEC) <michael.cruden@dec.ny.gov>; Deming, Justin H (HEALTH) <justin.deming@health.ny.gov>

Cc: mdunn@elmiracityschools.com; Kevin.Krueger@unisys.com; haustin@elmiracityschools.com; Paul Brookner <PBrookner@Geosyntec.com>; mmurphy@bdlaw.com; DINSOGNA@gstboces.org; jpaul@bdlaw.com

Subject: RE: Former Sperry Remington Site - North Portion (#c808022) - Interim Remedial Measure (IRM) #2 Pre-Design Investigation Addendum #1

Hi Aron,

I have looked at the data and proposed Amendment to the PDIWP received this morning and have marked up additional PCB data gaps that were apparent (see attached).

I do not find that data was added to soil boring logs, as I previously requested to expedite a thorough review.

Based on the short notice of this data, soil boring logs and your anticipated start of work tomorrow, I make no promises on the accuracy of my review. You may proceed at your own risk that locations and data will be accepted by the Department for IRM confirmatory excavation limits.

Please anticipate a 45 day Department review of the IRM work plan for this summer and plan accordingly.

Regards,

Tim

Timothy A. Schneider P.E.

Professional Engineer 1, Division of Environmental Remediation

New York State Department of Environmental Conservation

6274 East Avon-Lima Road, Avon, NY 14414

P: (585) 226-5480 | F: (585) 226-8139 | timothy.schneider@dec.ny.gov

www.dec.ny.gov |  | 

From: Aron Krasnopoler [<mailto:AKrasnopoler@Geosyntec.com>]

Sent: Monday, February 26, 2018 10:55 AM

To: Schilling, Bernette (DEC) <bernette.schilling@dec.ny.gov>; Hettrick, Dawn E (HEALTH) <dawn.hettrick@health.ny.gov>; Conlon, Benjamin (DEC) <benjamin.conlon@dec.ny.gov>; Schneider, Timothy A (DEC) <timothy.schneider@dec.ny.gov>; Cruden, Michael (DEC) <michael.cruden@dec.ny.gov>; Deming, Justin H (HEALTH) <justin.deming@health.ny.gov>

Cc: mdunn@elmiracityschoools.com; Kevin.Krueger@unisys.com; haustin@elmiracityschoools.com; PBrookner@Geosyntec.com; mmurphy@bdlaw.com; DINSOGNA@gstboces.org; jpaul@bdlaw.com

Subject: Former Sperry Remington Site - North Portion (#c808022) - Interim Remedial Measure (IRM) #2 Pre-Design Investigation Addendum #1

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On behalf of Unisys Corporation (Unisys), please find instructions below on how to access Amendment #1 to the IRM #2 Pre-Design Investigation Work Plan for the Former Remington Site – North Portion (#c808022) in Elmira, NY. This file replaces the attachment distributed on 22 February 2016 by email. Reduction of file size of the email attachment resulted in a loss of resolution on the figures. Figures have not been compressed in the replacement file to preserve resolution.

My apologies for the inconvenience.

Sincerely,
Aron Krasnopoler

From: [Schneider, Timothy A \(DEC\)](#)
To: [Aron Krasnopoler](#); [Schilling, Bernette \(DEC\)](#); [michael.cruden](#); [justin.deming](#); [Hetrick, Dawn E \(HEALTH\)](#); [Conlon, Benjamin \(DEC\)](#); [Dudek, Heidi M \(DEC\)](#)
Cc: [Krueger, Kevin D.](#); [jpaul@bdlaw.com](#); [Michael G. Murphy](#); [Paul Brookner](#); [mdunn@elmiracityschools.com](#); [DINSOGNA@gstboces.org](#); [haustin](#)
Subject: RE: Former Sperry Remington Site - North Portion (#c808022) - Interim Remedial Measure (IRM) #2 Pre-Design Investigation Addendum #4
Date: Thursday, June 7, 2018 7:53:25 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)

Hi Aron,

I have reviewed Amendment #4 to the IRM #2 Pre Design Work Plan for the Former Sperry Remington Site – North Portion (#c808022) and have the following comment:

- PCB remediation waste (PCBs $\geq$ 50 ppm) is expected to be encountered and must be disposed of at an EPA regulated TSCA landfill. If this waste cannot be segregated during the proposed activities, then all waste generated must be disposed of as such.

Provided that this approach is undertaken, then notice to proceed is authorized.

Regards,

Tim

Timothy A. Schneider P.E.

Professional Engineer 1, Division of Environmental Remediation

New York State Department of Environmental Conservation

6274 East Avon-Lima Road, Avon, NY 14414

P: (585) 226-5480 | F: (585) 226-8139 | timothy.schneider@dec.ny.gov

www.dec.ny.gov |  | 

From: Aron Krasnopoler [<mailto:Akrasnopoler@Geosyntec.com>]

Sent: Monday, June 04, 2018 5:41 PM

To: Schneider, Timothy A (DEC) <timothy.schneider@dec.ny.gov>; Schilling, Bernette (DEC) <bernette.schilling@dec.ny.gov>; Cruden, Michael (DEC) <michael.cruden@dec.ny.gov>; Deming, Justin H (HEALTH) <justin.deming@health.ny.gov>; Hetrick, Dawn E (HEALTH) <dawn.hetrick@health.ny.gov>; Conlon, Benjamin (DEC) <benjamin.conlon@dec.ny.gov>; Dudek, Heidi M (DEC) <heidi.dudek@dec.ny.gov>

Cc: Kevin.Krueger@unisys.com; jpaul@bdlaw.com; mmurphy@bdlaw.com; Paul Brookner <PBrookner@Geosyntec.com>; mdunn@elmiracityschools.com; DINSOGNA@gstboces.org; haustin@elmiracityschools.com

Subject: Former Sperry Remington Site - North Portion (#c808022) - Interim Remedial Measure (IRM) #2 Pre-Design Investigation Addendum #4

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Dear Tim,

On behalf of Unisys Corporation (Unisys), please find attached to this email Amendment #4 to the IRM #2 Pre-Design Investigation Work Plan for the Former Remington Site – North Portion (#c808022) in Elmira, NY. The purpose of this amendment is to conduct subsurface utility investigation to support IRM #2 design. Either Paul or I will be following up with you to ensure your receipt and inquire of any initial comments or questions.

Best regards,

Aron

Aron Krasnopoler, Ph. D., P.E. (MD, NY)

Project Engineer

10211 Wincopin Circle, 4th Floor
Columbia, MD 21044
Phone: 410-381-4333
Fax: 410-381-4499
Mobile: 202-550-7724
www.geosyntec.com

Beech and Bonaparte logo_color



[GEOSYNTEC](#) | [MMI ENGINEERING](#) | [SIREM](#) | [SAVRON](#)
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NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Division of Environmental Remediation, Remedial Bureau E

625 Broadway, 12th Floor, Albany, NY 12233-7017

P: (518) 402-9813 | F: (518) 402-9819

www.dec.ny.gov

June 21, 2018

Mr. Kevin Krueger, P.E.
Unisys Corporation
Corporate Environmental Affairs
3199 Pilot Knob Road
Eagan, New York 55121

RE: Former Sperry Remington Site No. C808022
Elmira High School SVI Evaluation Work Plan
Elmira, Chemung County

Dear Mr. Krueger:

The New York State Department of Environmental Conservation (NYSDEC), in consultation with the New York State Department of Health (NYSDOH) has reviewed and approved the Sperry Remington Elmira High School SVI Evaluation Work Plan dated June 19, 2018.

Should you have any questions or comments with regards to this matter, please contact me at heidi.dudek@dec.ny.gov or 518-402-0193.

Sincerely,



Heide-Marie Dudek, P.E.
Project Manager
Remedial Section A, Remedial Bureau E
Division of Environmental Remediation

ec: M. Cruden – NYSDEC
B. Conlon – NYSDEC
D. Harrington - NYSDEC
B. Schilling – NYSDEC, Region 8
T. Schneider – NYSDEC, Region 8
J. Deming – NYSDOH
D. Hettrick – NYSDOH
P. Brookner – Geosyntec
A. Krasnopolter – Geosyntec
W. Wertz - Geosyntec



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July 18, 2018

Mr. Kevin Krueger, P.E.
Unisys Corporation
Corporate Environmental Affairs
3199 Pilot Knob Road
Eagan, New York 55121

RE: Former Sperry Remington Site No. C808022
Elmira High School Football Field RI/PDI Work Plan
Elmira, Chemung County

Dear Mr. Krueger:

The New York State Department of Environmental Conservation (NYSDEC) has reviewed and approves the Sperry Remington Elmira High School Football Field RI/PDI Work Plan prepared by Geosyntec dated July 17, 2018.

Should you have any questions or comments with regards to this matter, please contact me at heidi.dudek@dec.ny.gov or 518-402-0193.

Sincerely,



Heide-Marie Dudek, P.E.
Project Manager
Remedial Section A, Remedial Bureau E
Division of Environmental Remediation

ec: M. Cruden – NYSDEC
B. Conlon – NYSDEC
B. Schilling – NYSDEC, Region 8
T. Schneider – NYSDEC, Region 8
J. Deming – NYSDOH
D. Hettrick – NYSDOH
P. Brookner – Geosyntec
A. Krasnopoler – Geosyntec



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NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

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6274 East Avon-Lima Road, Avon, NY 14414-9516
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www.dec.ny.gov

Via E-mail

July 25, 2018

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

Dear Mr. Krueger:

**Re: Interim Remedial Measures #2 Work Plan
Former Sperry Remington Site #c808022
Elmira, Chemung County**

The New York State Department of Environmental Conservation (NYSDEC) has completed the review of "Interim Remedial Measures #2 Work Plan" for the Former Sperry Remington – North Portion Site #c808022, dated 15 March 2018, last revised 13 July 2018 and the 22 June 2018 Geosyntec Response to Conditional Approval. The conditions of IRM #2 approval have been addressed collectively by these documents and therefore together form the final approved IRM #2 Work Plan.

Please integrate the above and have a hard copy kept in the document repository and one sent to NYSDEC.

As a reminder, all final documents and reports are to be in electronic format on compact computer discs (CDs). The disk should contain an Adobe® Acrobat® Portable Document Format (PDF) file and must be searchable. In addition, all data submitted to the DER must be in the DEC-approved Electronic Data Deliverable (EDD). Moreover, new data must be submitted on a continuous basis immediately after data validation occurs but in no event more than 90 days after the data has been submitted to the remedial party or its consultant(s). In other words, data is not to be held and submitted with the related reports. Please contact me at (585) 226-5480 if you have any questions regarding this letter.

Sincerely,



Digitally signed by Timothy A. Schneider
DN: cn=Timothy A. Schneider,
o=NYSDEC, ou=DER,
email=timothy.schneider@dec.ny.gov,
c=US
Date: 2018.07.25 15:48:01 -04'00'

Timothy Schneider, P.E.
Professional Engineer 1



Department of
Environmental
Conservation

P. Brookner
A. Krasnopoler
B. Schilling
M. Cruden
B. Conlon
H. Dudek
D. Harrington
D. Hettrick
J. Deming

DRAFT

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Division of Environmental Remediation, Region 8
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www.dec.ny.gov

Via E-mail

July 31, 2018

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

Dear Mr. Krueger:

**Re: Amendment #2 - Interim Remedial Measures #2 Work Plan
Former Sperry Remington Site #c808022
Elmira, Chemung County**

The New York State Department of Environmental Conservation (NYSDEC) has completed the review of Amendment #2 - Interim Remedial Measures #2 Work Plan for the Former Sperry Remington – North Portion Site #c808022, dated 17 July 2018, and accept the work plan modifications.

A hard copy is required to be kept in the document repository and one sent to NYSDEC.

As a reminder, all final documents and reports are to be in electronic format on compact computer discs (CDs). The disk should contain an Adobe® Acrobat® Portable Document Format (PDF) file and must be searchable. In addition, all data submitted to the DER must be in the DEC-approved Electronic Data Deliverable (EDD). Moreover, new data must be submitted on a continuous basis immediately after data validation occurs but in no event more than 90 days after the data has been submitted to the remedial party or its consultant(s). In other words, data is not to be held and submitted with the related reports. Please contact me at (585) 226-5480 if you have any questions regarding this letter.

Sincerely,



Digitally signed by Timothy A. Schneider
DN: cn=Timothy A. Schneider, o=NYSDEC,
ou=DER,
email=timothy.schneider@dec.ny.gov, c=US
Date: 2018.07.31 09:19:49 -04'00'

Timothy Schneider, P.E.
Professional Engineer 1

P. Brookner
A. Krasnopoler



Department of
Environmental
Conservation

B. Schilling
M. Cruden
B. Conlon
D. Hettrick
J. Deming

DRAFT

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

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Via E-mail

July 31, 2018

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

Dear Mr. Krueger:

**Re: Amendment #2 - Interim Remedial Measures #2 Work Plan
Former Sperry Remington Site #c808022
Elmira, Chemung County**

The New York State Department of Environmental Conservation (NYSDEC) has completed the review of Amendment #2 - Interim Remedial Measures #2 Work Plan for the Former Sperry Remington – North Portion Site #c808022, dated 17 July 2018, and accept the work plan modifications.

A hard copy is required to be kept in the document repository and one sent to NYSDEC.

As a reminder, all final documents and reports are to be in electronic format on compact computer discs (CDs). The disk should contain an Adobe® Acrobat® Portable Document Format (PDF) file and must be searchable. In addition, all data submitted to the DER must be in the DEC-approved Electronic Data Deliverable (EDD). Moreover, new data must be submitted on a continuous basis immediately after data validation occurs but in no event more than 90 days after the data has been submitted to the remedial party or its consultant(s). In other words, data is not to be held and submitted with the related reports. 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. Krasnopolter



Department of
Environmental
Conservation

B. Schilling
M. Cruden
B. Conlon
D. Hettrick
J. Deming

DRAFT

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

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Via E-mail

August 15, 2018

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

Dear Mr. Krueger:

**Re: Site Characterization Report
Former Sperry Remington Site #c808022
Elmira, Chemung County**

The New York State Department of Environmental Conservation (NYSDEC) has completed the review of "Site Characterization Report" for the Former Sperry Remington – North Portion Site #808022, dated 17 May 2017, and approve the report contingent upon the following modifications:

1. Please remove "Agency Review Draft".
2. Tables & Figures – Please modify first sample depth below surface soil / pavement (0.17-2').
3. Figure 10 – PCB sampling results for FB7-E do not appear on this figure.
4. Section 1.4.3.1 – Please identify the acronym AOC.
5. Section 5.2.1 In-Line Camera Survey
 - a. Please verify from video that CB-02 is offset east from the north south main.
 - b. Please identify that CB-03 contained water with sheen and flow was observed in farthest south reach from CB-03.
6. Section 6.1.1 - Former Combined Industrial Sewer – 2nd Bullet – portions of the industrial sewer not incorporated in EHS storm sewer collect surface runoff and were observed flowing south of CB-03.



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7. Section 6.1.1 - Former Combined Industrial Sewer – The camera survey was inconclusive in determining the following:
 - a. Extent, configuration and condition north of CB-24
 - b. Configuration and condition north and south of CB-02
 - c. Extent, configuration and condition south of CB-03
 - d. Source and destination of flow south of CB-03
 - e. Presence, extent, configuration and condition north of CB-25
8. Section 6.1.3.3 – Elmira High School F and G Wings – Please add:
 - a. The source of TCE soil vapor contamination was not determined.
 - b. Cafeteria courtyard plating waste and presence of former industrial infrastructure not addressed in SC.
 - c. SC was limited to EHS exterior N, S, & W perimeter.
9. Section 6.1.3.6 – Gymnasium – East Side
 - a. Please remove last bullet
 - b. Please add:
 - i. The source of SVOC, Petroleum and VOC groundwater contamination was not determined.
 - ii. Intermediate depth groundwater and soil characterization was not completed.
10. Section 6.1.4 – Site-Wide Groundwater
 - a. 4th Bullet – please add: SC data was collected for shallow GW conditions. Sources of groundwater contamination have not been identified and intermediate groundwater conditions need further evaluation.
 - b. Please add on-site GW plumes appear to be migrating off-site to the east.
11. Section 6.2.1 Remedial Investigation – Last Bullet: please add VOCs.
12. Section 6.2.2 EMP Implementation – identify “Environmental Management Plan” will be replaced with an Interim Site Management Plan.
13. Table 3A-C – Please move these tables to an appendix.
14. Please address the presence of Acetone as a potential COC in groundwater and soil vapor.

Please revise and resubmit final report to DEC & DOH and replace draft reports in the document repositories.

As a reminder, all final documents and reports are to be in electronic format on compact computer discs (CDs). The disk should contain an Adobe® Acrobat® Portable Document Format (PDF) file and must be searchable. In addition, all data submitted to the DER must be in the DEC-approved Electronic Data Deliverable (EDD). Moreover, new data must be submitted on a continuous basis immediately after data validation occurs but in no event

more than 90 days after the data has been submitted to the remedial party or its consultant(s). In other words, data is not to be held and submitted with the related reports. 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
B. Schilling
M. Cruden
H. Dudek
D. Harrington
B. Conlon
D. Hettrick
J. Deming

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Division of Environmental Remediation, Remedial Bureau E

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August 17, 2018

Mr. Kevin Krueger, P.E.
Unisys Corporation
Corporate Environmental Affairs
3199 Pilot Knob Road
Eagan, New York 55121

RE: Former Sperry Remington Site No. C80822
Elmira High School IRM SSDS Work Plan
Elmira, Chemung County

Dear Mr. Krueger:

The New York State Department of Environmental Conservation (NYSDEC), in consultation with the New York State Department of Health (NYSDOH), has reviewed and conditionally approves the Sperry Remington Elmira High School Interim Remedial Measure (IRM) Sub-Slab Depressurization System (SSDS) Room 148 Work Plan prepared by Geosyntec dated August 8 2018 upon resolution of the following comments. Installation of the SSDS system may proceed as outlined in the work plan.

1. Please prepare a stand-alone letter report with the results and recommendations resulting from the SSDS/Heating Ventilation and Air Conditioning (HVAC) system in the building occupied mode evaluation.
2. Please add post mitigation indoor air samples in the following rooms: Room 148, 147, 146 and 151.

Should you have any questions or comments with regards to this matter, please contact me at heidi.dudek@dec.ny.gov or 518-402-0193.

Sincerely,



Heide-Marie Dudek, P.E.
Project Manager
Remedial Section A, Remedial Bureau E
Division of Environmental Remediation



Department of
Environmental
Conservation

ec: M. Cruden – NYSDEC
B. Conlon – NYSDEC
B. Schilling – NYSDEC, Region 8
T. Schneider – NYSDEC, Region 8
J. Deming – NYSDOH
D. Hettrick – NYSDOH
P. Brookner – Geosyntec
A. Krasnopoler – Geosyntec
B. Wertz – Geosyntec

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March 4, 2019

Mr. Kevin Krueger, P.E.
Unisys Corporation
Corporate Environmental Affairs
3199 Pilot Knob Road
Eagan, New York 55121

RE: Former Sperry Remington Site No. C80822
Elmira High School IRM Music Room SSDS CCR
Elmira, Chemung County

Dear Mr. Krueger:

The New York State Department of Environmental Conservation (NYSDEC), in consultation with New York State Department of Health (NYSDOH), has reviewed the Sperry Remington Elmira High School Interim Remedial Measure (IRM) Sub-Slab Depressurization System (SSDS) Room 148 Construction Completion Report and Supplement Vapor Intrusion Assessment Report Plan prepared by Geosyntec dated January 31, 2019 and approves on contingent upon resolution of the following comments. Please revise accordingly and submit final copies.

1. Supplemental SVI Evaluation Section 3.1.1: Please add sample 151A as an area sampled.
2. Supplemental SVI Evaluation Tables 7 through 17: The sample collected from 151A is misidentified on tables. Please correct to identify the correct location.
3. SSDS Construction Completion Report Section 1 Second Paragraph: The second paragraph states that sub-slab soil gas concentrations for TCE were ... "above NYSDOH sub-slab vapor guideline value for mitigation of 60 $\mu\text{g}/\text{m}^3$." NYSDOH Soil Vapor Intrusion Guidance does not specify soil vapor guidelines. Please revise this sentence as follows. "Sub-slab soil vapor TCE concentrations from samples collected in Room 148 (Music Wing) of the building ranged from 160 to 380 $\mu\text{g}/\text{m}^3$; in accordance with the May 2017 Matrix A of the "Guidance for Evaluating Soil Vapor Intrusion in New York State" mitigation may be recommended."



Department of
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Conservation

Should you have any questions or comments with regards to this matter, please contact me at heidi.dudek@dec.ny.gov or 518-402-0193.

Sincerely,



Heide-Marie Dudek, P.E.
Project Manager
Remedial Section A, Remedial Bureau E
Division of Environmental Remediation

ec: M. Cruden – NYSDEC
D. Harrington - NYSDEC
B. Conlon – OGC, NYSDEC
B. Schilling – NYSDEC, Region 8
T. Schneider – NYSDEC, Region 8
J. Deming – NYSDOH
D. Hettrick – NYSDOH
P. Brookner – Geosyntec
A. Krasnopoler – Geosyntec
B. Wertz – Geosyntec
H. Austin – Elmira School District
M. Dunn – Elmira School District
P. Sylvestri – Harter Secrest & Emery LLP

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Division of Environmental Remediation, Remedial Bureau E

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March 19, 2019

Mr. Kevin Krueger, P.E.
Unisys Corporation
Corporate Environmental Affairs
3199 Pilot Knob Road
Eagan, New York 55121

RE: Former Sperry Remington Site No. C80822
Elmira High School 2014 SSDS CCR
Elmira, Chemung County

Dear Mr. Krueger:

The New York State Department of Environmental Conservation (NYSDEC), in consultation with New York State Department of Health (NYSDOH), has reviewed and approves the Sperry Remington Elmira High School 2014 Interim Remedial Measure (IRM) Sub-Slab Depressurization System (SSDS) Construction Completion Report and Vapor Intrusion Assessment Report Plan prepared by Geosyntec dated January 2019. Please submit final copies.

Should you have any questions or comments with regards to this matter, please contact me at heidi.dudek@dec.ny.gov or 518-402-0193.

Sincerely,



Heide-Marie Dudek, P.E.
Project Manager
Remedial Section A, Remedial Bureau E
Division of Environmental Remediation

ec: M. Cruden, NYSDEC
D. Harrington, NYSDEC
B. Conlon, OGC, NYSDEC
B. Schilling, NYSDEC, Region 8
T. Schneider, NYSDEC, Region 8
J. Deming, NYSDOH
D. Hettrick, NYSDOH

P. Brookner, Geosyntec
A. Krasnopoler, Geosyntec
B. Wertz, Geosyntec
H. Austin, Elmira School District
M. Dunn, Elmira School District
P. Sylvestri, Harter Secrest & Emery



Department of
Environmental
Conservation

From: Dudek, Heidi M (DEC) <heidi.dudek@dec.ny.gov>
Sent: Friday, April 19, 2019 2:25 PM
To: Eric Tollefsrud <ETollefsrud@Geosyntec.com>
Cc: Ron Arcuri <RArcuri@Geosyntec.com>; kevin.krueger@unisys.com; Schneider, Timothy A (DEC) <timothy.schneider@dec.ny.gov>; Schilling, Bernette (DEC) <bernette.schilling@dec.ny.gov>; Harrington, David (DEC) <david.harrington@dec.ny.gov>; Howe, Martin R <Martin.Howe@unisys.com>; Paul Brookner <PBrookner@Geosyntec.com>; Mike Dunn <mdunn@elmiracityschools.com>; Cruden, Michael (DEC) <michael.cruden@dec.ny.gov>
Subject: Re: Football Field PDI Amendment 3

Thank you!

I noted that you are not proposing metals sampling in the monument area. This area will require metals confirmation sampling during remediation.

With the noted exception above, the "Texas" IRM PDI is approved.

Sent from my iPhone

On Apr 19, 2019, at 2:19 PM, Eric Tollefsrud <ETollefsrud@Geosyntec.com> wrote:

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Magenta is proposed metals sampling location
Yellow is proposed SVOCs/VOCs sampling location

From: Dudek, Heidi M (DEC) <heidi.dudek@dec.ny.gov>
Sent: Friday, April 19, 2019 1:14 PM
To: Eric Tollefsrud <ETollefsrud@Geosyntec.com>
Cc: Ron Arcuri <RArcuri@Geosyntec.com>; kevin.krueger@unisys.com; Schneider, Timothy A (DEC) <timothy.schneider@dec.ny.gov>; Schilling, Bernette (DEC) <bernette.schilling@dec.ny.gov>; Harrington, David (DEC) <david.harrington@dec.ny.gov>; Howe, Martin R <Martin.Howe@unisys.com>; Paul Brookner <PBrookner@Geosyntec.com>; Mike Dunn <mdunn@elmiracityschools.com>
Subject: Re: Football Field PDI Amendment 3

Hi Eric what is the difference between the yellow and magenta proposed sampling points?

Sent from my iPhone

On Apr 19, 2019, at 12:14 PM, Eric Tollefsrud <ETollefsrud@Geosyntec.com> wrote:

ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.

All,

Attached is a map of the planned sampling locations in the Texas Area for IRM3 PDI.

<>Eric

From: Eric Tollefsrud

Sent: Friday, April 19, 2019 10:21 AM

To: Dudek, Heidi M (DEC) <heidi.dudek@dec.ny.gov>; Ron Arcuri <RArcuri@Geosyntec.com>

Cc: kevin.krueger@unisys.com; Schneider, Timothy A (DEC) <timothy.schneider@dec.ny.gov>; Schilling, Bernette (DEC) <bernette.schilling@dec.ny.gov>; Harrington, David (DEC) <david.harrington@dec.ny.gov>; Howe, Martin R <Martin.Howe@unisys.com>; Paul Brookner <PBrookner@Geosyntec.com>; 'Mike Dunn' <mdunn@elmiracityschools.com>

Subject: RE: Football Field PDI Amendment 3

Hi Heidi,

Please see the response, in the message below, as discussed on the 4/18/19 technical call.

A map showing the planned sequence of the soil borings for next week's work in the Texas Area is attached to this message.

Regards,

<>Eric

Eric Tollefsrud, PG (MN, WI, NE)

Geosyntec Consultants, Inc. | T 612-253-8202 | M 612-791-0506

100 Washington Avenue South, Suite 1590 | Minneapolis, MN 55401

From: Dudek, Heidi M (DEC) <heidi.dudek@dec.ny.gov>

Sent: Wednesday, April 17, 2019 2:53 PM

To: Ron Arcuri <RArcuri@Geosyntec.com>

Cc: kevin.krueger@unisys.com; Schneider, Timothy A (DEC) <timothy.schneider@dec.ny.gov>; Schilling, Bernette (DEC) <bernette.schilling@dec.ny.gov>; Harrington, David (DEC) <david.harrington@dec.ny.gov>; Howe, Martin R <Martin.Howe@unisys.com>; Eric Tollefsrud <ETollefsrud@Geosyntec.com>; Paul Brookner <PBrookner@Geosyntec.com>

Subject: RE: Football Field PDI Amendment 3

Hi Ron –

Please see our comments on the EHS "Texas" IRM Predesign Investigation. I received the message from Marty Howe concerning the relocation of several borings that were originally proposed through the track and are now being relocated to outside the track area. I don't believe that the relocation of the borings will change our comments below.

1. Please provide analytical methods for sample analysis and confirm that the metals analysis will be for the full suite TAL Metals and is not restricted to RCRA metals.

Metals analysis will be for full suite TAL metals

TCL VOCs – 8260C

TCL SVOCs – 8720D

TCL PCBs – 8082A

TAL Metals - 6010C/7470A

2. Please confirm that the area of investigation and the "Texas" IRM area (south of the monument area) is being limited to area north of the large concrete apron near the front of the school.

Yes, the area of investigation and the Texas IRM area is being limited to the area north of the large concrete apron near the front of the school.

3. As stated in previous correspondence, confirmation sampling will be required as part of the IRM.

Noted

4. Please note that the extent of the summer 2019 IRM work is anticipated to involve only a portion of the proposed sampling area west of the School and Track.

Noted

5. Please note that additional sampling closer to the music wing (TCE) and west into the main parking lot (TCE) will be required to determine the full nature and extent contamination in the RI.

Noted

6. Department review of sampling figures is limited to areas related to summer 2019 IRM work. Additional sampling figures for IRM #3 PDI delineation are expected in a separate submission.

Noted

Heide-Marie Dudek, P.E.

Project Manager, Division of Environmental Remediation

New York State Department of Environmental Conservation

Remedial Bureau E, Section A
Division of Environmental Remediation
625 Broadway, 12th Floor
Albany, New York, 12233-7017
P: 518-402-9813 | F: 518-402-9819 | heidi.dudek@dec.ny.gov

www.dec.ny.gov | <image001.png.secure> | <image002.png.secure>

From: Ron Arcuri <RArcuri@Geosyntec.com>

Sent: Tuesday, April 16, 2019 11:23 AM

To: Dudek, Heidi M (DEC) <heidi.dudek@dec.ny.gov>

Cc: kevin.krueger@unisys.com; Schneider, Timothy A (DEC) <timothy.schneider@dec.ny.gov>; Schilling, Bernette (DEC) <bernette.schilling@dec.ny.gov>; Harrington, David (DEC) <david.harrington@dec.ny.gov>; Howe, Martin R <Martin.Howe@unisys.com>; Eric Tollefsrud <ETollefsrud@Geosyntec.com>; Paul Brookner <PBrookner@Geosyntec.com>

Subject: RE: Football Field PDI Amendment 3

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Hi Heidi

Thanks for your remaining comments to the Football Field PDI Amendment 3. We have prepared a revised set of drawings and a sampling and analysis table showing proposed soil sampling locations, depths and laboratory analyses. They include additional scope intended to address comments 6 and 7 in your April 8, 2019 email with respect to work proposed in the Texas Area. Upon your concurrence with the sampling approach, we will initiate the proposed sampling within the Texas Area. We have contractors lined up to begin this work on Monday, April 22, 2019.

We are also revising Amendment #3 to the Football Field PDI Work Plan to address your remaining comments and anticipate providing that to you by April 26, 2019.

If you have questions or need anything further, please let us know.

Thanks
Ron

From: Dudek, Heidi M (DEC) <heidi.dudek@dec.ny.gov>

Sent: Monday, April 8, 2019 2:27 PM

To: Eric Tollefsrud <ETollefsrud@Geosyntec.com>; Paul Brookner <PBrookner@Geosyntec.com>; Howe, Martin R <Martin.Howe@unisys.com>

Cc: Krueger, Kevin D. (kevin.krueger@unisys.com) <kevin.krueger@unisys.com>; Schneider, Timothy A (DEC) <timothy.schneider@dec.ny.gov>; Schilling, Bernette (DEC) <bernette.schilling@dec.ny.gov>; Harrington, David (DEC) <david.harrington@dec.ny.gov>

Subject: Football Field PDI Amendment 3

Hi Marty, Paul and Eric:

I understand that we have been using teleconferences to address comments on the PDI Amendment 3 work plan; however, I wanted to send an email to document the State's

comments and concerns on the proposed plan. I have also added comments as they are related to expanded IRM #1 area.

1. The final design for IRM #3 will require discrete confirmation sampling of all excavated areas. Confirmation and documentation sampling analysis will include PCBs and TAL metals. SVOC and VOC confirmation sampling may be required in certain areas as appropriate. These areas will be determined upon analysis of all pre-design investigation data and if no data exists boring log information.
2. Characterization of potential releases from the industrial sewer located along the eastern boundary is insufficient. As has been discussed, review of the sample locations intended to characterize potential releases from the industrial sewer located along the eastern boundary line are not in the vicinity of the industrial line. Revisions to the sampling plan will include determination of the structure of the industrial sewer and integrity of the sewer, sampling adjacent to the Catch Basin 24, determination of depth of industrial sewers with samples located adjacent to the sewer to determine if any releases occurred, and samples will be collected from any areas where a collapse of the sewer is found during investigation. If boring cannot be located in these areas, test pitting may be required.
3. Will confined space entry be required to collect samples from catch basins and manholes? If yes, even as a contingency, plan should address these requirements.
4. The proposed intermediate groundwater monitoring well B2544 has a proposed depth of 25 to 35-feet below ground surface (bgs), however, the well is intended to sample at the top of silty clay formation which is located at depth of approximately 45 bgs.
5. What is the status of MW-40 located in the southeastern quadrant of the football field? Is the well still viable? If viable, please sample for PCBs, Metals, VOCs, SVOCs and Diesel Range Organics.
6. The proposed soil sampling program is insufficient to delineate the extent of metals contamination. Please provide additional delineation of lead in exceedance of 1,000 PPM and locations where barium, chromium and mercury exceed the "TCLP rule of 20". All soil samples collected as part of Amendment #3 are required to be analyzed for TAL Metals.
7. As has been previously discussed, the PDI investigation must include sampling and analysis to define the nature and extent of contamination. The figures provided do not provide enough information for non-PCB constituents to evaluate the proposed sampling locations and depths for consistency with the Remedial Investigation objectives.
8. Will temporary MWs be removed upon demobilization?
9. Figure 5 does not depict remedial action for all PCBs above the restricted residential SCO of 1 PPM west of the grandstand. Please revise.

I am in the field tomorrow and Wednesday, but will be checking my email as I have access.

Heidi

Heide-Marie Dudek, P.E.

Project Manager, Division of Environmental Remediation

New York State Department of Environmental Conservation

Remedial Bureau E, Section A

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www.dec.ny.gov | <image001.png.secure> | <image002.png.secure>

<Sampling Locations, Texas Area.pdf.secure>

DRAFT

From: Eric Tollefsrud

Sent: Friday, May 10, 2019 2:03 PM

To: Dudek, Heidi M (DEC) <heidi.dudek@dec.ny.gov>; Howe, Martin R <Martin.Howe@unisys.com>

Cc: Krueger, Kevin D. (kevin.krueger@unisys.com) <kevin.krueger@unisys.com>; Paul Brookner <PBrookner@Geosyntec.com>; Ron Arcuri <RArcuri@Geosyntec.com>; Cruden, Michael (DEC) <michael.cruden@dec.ny.gov>; Schilling, Bernette (DEC) <bernette.schilling@dec.ny.gov>; Schneider, Timothy A (DEC) <timothy.schneider@dec.ny.gov>; Harrington, David (DEC) <david.harrington@dec.ny.gov>

Subject: RE: Revised Agency Review Draft - FFC IRM#3 PDI Amendment 3

Thanks, Heidi

From: Dudek, Heidi M (DEC) <heidi.dudek@dec.ny.gov>

Sent: Friday, May 10, 2019 12:01 PM

To: Eric Tollefsrud <ETollefsrud@Geosyntec.com>; Howe, Martin R <Martin.Howe@unisys.com>

Cc: Krueger, Kevin D. (kevin.krueger@unisys.com) <kevin.krueger@unisys.com>; Paul Brookner <PBrookner@Geosyntec.com>; Ron Arcuri <RArcuri@Geosyntec.com>; Cruden, Michael (DEC) <michael.cruden@dec.ny.gov>; Schilling, Bernette (DEC) <bernette.schilling@dec.ny.gov>; Schneider, Timothy A (DEC) <timothy.schneider@dec.ny.gov>; Harrington, David (DEC) <david.harrington@dec.ny.gov>

Subject: Revised Agency Review Draft - FFC IRM#3 PDI Amendment 3

Hello Marty and Eric –

Tim and I have reviewed and approve the revised FFC IRM #3 PDI Amendment 3 Workplan (attached) contingent upon the following comments. Please submit a final revised copy.

1. Page 4 First Redline paragraph last sentence: Please revise to state "...Unisys will provide a supplement to this work plan that addresses these comments."
2. Page 5 Soil Sampling First Sentence: Please delete the following "and meet NYSDEC requirements for excavation sidewall sample spacing (i.e., no greater than 30 feet". As stated in previous correspondence, confirmation/documentation sampling will be conducted upon completion of the excavation.
3. Page 5 Soil Sampling Second paragraph: Please incorporate the following Sampling/Delineation Rationale:
 - i. Metals
 1. 0-2' bgs Restricted Residential SCOs
 - a. Figures 14 / 15 not consistent with rationale
 2. >2' bgs
 - a. RCRA metals "RULE OF 20" (Ar, Ba, Cd, Cr, Hg, Se, Ag)
 - b. Pb $\geq$ 1000 ppm
 - ii. SVOCs
 1. 0-2' bgs Restricted Resident SCOs
 2. >2' bgs
 - a. TOTAL PAHs $\geq$ 100 ppm

4. Page 5: Please confirm that SVOC sampling/delineation rationale is satisfied for all SVOC sample locations.
5. Page 6 Second Paragraph: Please delete this paragraph, this sampling has not been approved.
6. Page 6 Table 1: Please verify that the Table 1 correlates with all figures and text.
7. Page 8 Catch Basin Inspection and Sampling: Please revise to include the following:
 - a. Catch Basin / Manhole Inspection will Document:
 - i. General Dimensions and Construction
 - ii. Pipe Inverts and Elevations
 - iii. Integrity of The Structure (Potential Release)
 1. Solid Bottom / Bottomless
 2. Perforated
 3. Deteriorated / Loose Construction
 - b. Rationale for Sampling Compromised Structures (Potential Release)
8. Figure 3 (and all applicable figures): Please revise per the following:
 - a. Industrial Sewer Between CB-24 And CB-1
 - i. Replace "Collapse With "Breach and Obstruction"
 - ii. Depict Segment 2 As Dashed (144' – Assumed Hazardous - Extent / Integrity / Lateral Connections Unknown)
9. Figures 6 through 13: Please revise legend to remove designation as sidewall sample or bottom sample. As stated previously and above, confirmation/documentation sampling will be conducted upon completion of the excavation. Samples are being completed to determine the nature and extent of contamination and delineate the extent of excavation.
10. Figure 16-19: Please remove Boring Locations B2722/B2723 sampling in these locations is not approved.
11. Figures 9 through 11: Please note and revise accordingly:
 - a. Boring B2773 NOT APPROVED Until Alignment and Invert Elevation Is Established and Sampling In Accordance With DER-10
 - b. Boring B2771 NOT APPROVED Until Sampling Rationale Established Based on Inspection Of CB-24
 - c. Borings B2772 And B2774 NOT APPROVED Until Sampling Rationale Established Based on Inspection Of Segment 2

12. Figure 24: Provide vertical delineation of B2215 per SVOC sampling/delineation rationale.

We have included a sketch on the Sewers Map with notes and photos from the Industrial Sewer videos.

Heide-Marie Dudek, P.E.

Project Manager, Division of Environmental Remediation

New York State Department of Environmental Conservation

Remedial Bureau E, Section A

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