

3 July 2018

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: Amendment #1
Interim Remedial Measures #2 Work Plan
Former Sperry Remington Site #c808022
Elmira, Chemung County**

Dear Mr. Schneider:

On behalf of Unisys Corporation (Unisys), Geosyntec Consultants, Inc. and its New York engineering affiliate, Beech and Bonaparte Engineering, P.C. (collectively, Geosyntec) are submitting this first amendment (Amendment #1) to the Interim Remedial Measures Work #2 Plan (IRM #2 Work Plan) for the Former Sperry Remington Site – North Portion (Site #c808022) (Site) in Elmira, New York. On 26 April 2016, Unisys applied to enter the Site into the NYSDEC Brownfields Cleanup Program (BCP) with the consent of Elmira City School District (ECSD). NYSDEC gave an initial determination that the BCP application was complete on 10 June 2016 and received public comments until 22 July 2016. The BCP Agreement for the Site was executed on 23 March 2017. Unisys proposed IRM #2 at the Site in accordance with the BCP Agreement on 15 March 2018 with revisions on 10 April 2018. The purpose of IRM #2 has been to remove soils impacted by polychlorinated biphenyls (PCBs) within areas of the Site in which ECSD plans to construct capital improvements in 2018 including the rear parking lot. Agency comments were received on 29 May 2018 and a Final IRM #2 Work Plan was submitted on 6 June 2018. NYSDEC gave conditional approval for work to proceed on IRM #2 on 20 June 2018. Geosyntec provided a response to approval conditions on 22 June 2018.

The purpose of this Amendment #1 is to request approval for modifications to the construction of IRM #2 as presented in the Final IRM #2 Work Plan dated 6 June 2018 and the 22 June 2018 Response to Conditional Approval. The proposed modifications address the following aspects of IRM #2 construction: 1) sequence of sheet pile installation, 2) management of potential reuse soils overlaying PCB remediation waste (TSCA) and 3) the use of automated wheel wash units for decontamination.

PROPOSED MODIFICATIONS

Sequence of Sheet Pile Installation

As discussed with NYSDEC on 29 June 2018, approval is requested to begin sheet pile wall installation near the EHS building prior to completion of sheet pile wall installation along the southern property boundary and to form the eastern and northern walls of the TSCA accumulation area in order to meet the

schedule for Phase 1 excavation and backfill. We are requesting approval to relocate the crane for sheet pile installation to the EHS building. Steel sheet pile is currently being installed along the southern property boundary and to form the eastern and northern walls of the TSCA accumulation area. As of 29 June 2018, nineteen (19) sheets have been installed on the property boundary and five (5) sheets have been installed to form the eastern wall. Sheet pile wall extends from the eastern end of the TSCA accumulation area to approximately eight (8) feet west of the catch basin along the property line. In addition, erosion and sedimentation (E&S) controls have been installed at the property boundary and along the edge of parking lot pavement. A second line of silt fence will be trenched in along the southern end of the property boundary to provide additional E&S controls. Concrete blocks covered in poly sheeting will be installed on the north side of the TSCA accumulation to ensure that no material leaves the area. Upon completion of the Phase 1 sheeting piling, sheet piling along the southern property line will be continued and completed.

Management of Potential Reuse Soils Overlaying TSCA (Amend Section 2.2)

Soils with total PCB concentrations less than or equal to ten (10) mg/kg will be stockpiled in the Material Staging (MSA) for potential reuse as backfill below two (2) ft bgs in accordance with Section 5.4 of DER-10. Soils stockpiled for potential reuse will be sampled for analyses for PCBs, metals, semi-volatile organic compounds (SVOCs), and volatile organic compounds (VOCs) at the frequency presented in Table 5.4 (e) 10 of DER-10. Soils that overlay PCB remediation waste will be segregated for testing prior to transport to the MSA. For those soils, approval will be requested to relocate those soils to the MSA pending receipt of results for non-PCB constituents of concern (COCs) if preliminary PCB results indicate that total PCB concentrations are less than ten (10) mg/kg. Soil will be staged and managed separate from all other approved material. It shall be understood that if other non-PCB COCs are detected above the reuse criteria those soils will not be considered for reuse on Site. The material will immediately be disposed of offsite at an appropriate facility and sampling of the MSA area may be necessary to ensure cross-contamination did not occur in the area the soil was managed.

Truck Decontamination

Automated truck wash units have been used for the decontamination of trucks leaving the TSCA Loading Area and the MSA as shown on Sheets 5 and 15 of the Construction Drawings, respectively. Approval is requested to construct equipment wash pads per the detail on Sheet 11 in place of the current automated truck wash units in the TSCA Loading Area and the MSA and use them for truck decontamination moving forward. At the MSA, the previously constructed equipment wash pad used during IRM #1 in 2017 will be inspected for use in accordance with IRM #2 Work Plan instead of new construction.

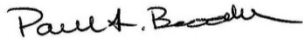
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CLOSING

Geosyntec appreciates the opportunity to submit this work plan to the NYSDEC, NYSDOH and ECSD. If you have any questions, please contact Mr. Kevin Krueger of Unisys at (651) 687-2210.

Sincerely,

Geosyntec Consultants, Inc.



Paul Brookner
Principal/Project Director
Geosyntec Consultants, Inc.



Aron Krasnopoler, Ph.D., P.E.
Project Engineer/Project Manager
Beech and Bonaparte Engineering P.C.

Copies to: Bernette Schilling, NYSDEC
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Certification

I Aron Krasnopoler certify that I am currently a NYS registered professional engineer as defined in 6 NYCRR Part 375 and that this Amendment #1 to the Interim Remedial Measures #2 Work Plan for the Former Sperry Remington Site – North Portion dated 3 July 2018 was prepared in accordance with all applicable statutes and regulations and in substantial conformance with the DER Technical Guidance for Site Investigation and Remediation (DER-10).



Aron Krasnopoler, P.E.



7/3/2018