

# **2022 Periodic Review Report Former Schweizer Aircraft Corporation**

1250 Schweizer Road  
Big Flats, Chemung County, New York  
NYSDEC BCP Number: C808033  
July 2022

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**July 2022**  
**F.E. PROJECT NO. 2013.039**

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## 1.0 Executive Summary

This Periodic Review Report (PRR) was prepared according to the requirements of the Site Management Plan (SMP) for the Schweizer Aircraft Corporation Facility located at 1250 Schweizer Road in Big Flats, New York (Figure 1), hereafter referred to as the “Site”. Investigation and remediation of the Site and the subsequent monitoring has been conducted under the New York State (NYS) Brownfield Cleanup Program (BCP) administered by the New York State Department of Environmental Conservation (NYSDEC). The Site was remediated in accordance with the Brownfield Cleanup Agreement (BCA) Index# B8-069 1-05-04, Site # C808033, which was issued on June 15, 2005. A Certificate of Completion was issued on September 22, 2010. Residual impacted soil remains onsite following the remedial work described in the Final Engineering Report (FER) dated December 2009, revised July 2010. The SMP was prepared in December 2009 and revised in July 2010 to manage residual impacted soil at the Site in perpetuity or until extinguishment of the environmental easement in accordance with 6 New York Code of Rules and Regulations (NYCRR) Part 375. Site-wide inspections and groundwater monitoring have been performed quarterly since January 2009 with the exception of the four quarter period from April 2012 through March 2013, which was inadvertently missed due to change in ownership; in 2013 groundwater and air monitoring was conducted in the second and third quarters only; per a request submitted November 15, 2013 groundwater monitoring activities have been temporarily suspended, by permission from the NYSDEC pending Department review of the 2013 monitoring reports, via an email dated December 19, 2013. Per a letter from NYSDEC dated December 10, 2015, monitoring activities have been discontinued, the letter states “The Department also acknowledges that the groundwater and air monitoring programs have been completed and have documented groundwater standards have been met for offsite areas and asymptotic groundwater conditions have been reached in the onsite MW-9 Area. Groundwater use restrictions apply to this area of the site and if this area is redeveloped in the Future, then it is preferred that the source of the chromium in groundwater is identified and addressed at that time.”

This Periodic Review Report (PRR) was prepared to document the monitoring and inspections that have occurred since the remediation work documented in the FER was completed. The previous ongoing monitoring and inspections have shown that the engineering controls continue to perform as designed and the requirements described in the environmental easement and the SMP have been met with the exception of the ongoing groundwater monitoring which was inadvertently discontinued due to the change in ownership. On February 28, 2012, Schweizer Aircraft Corporation transferred ownership of the 1250 Schweizer Road property to the Chemung County Industrial Development Agency (CCIDA). The transfer of real property included the 17.3-acre portion within the BCP program. On March 23, 2012, Schweizer Aircraft Corporation signed the Notice of Transfer of Certificate of Completion and an executed copy was filed with the County Clerk. A copy of the executed Notice is provided in Appendix A of the 2012 Periodic Review Report, prepared by Fuss & O’Neill April 2012. On July 10, 2018, Chemung County Industrial Development Agency (CCIDA) transferred ownership of the 1250 Schweizer Road property to Best Corporate Park, LLC. The transfer of real property included the 17.3-acre portion within the BCP program. On August 7, 2018, the 30-Day Post Transfer and Proof of Filing, submitted by Bousquet Holstein, PLLC attorneys for CCIDA, is provided in Appendix D of the 2018 Periodic Review Report.

## **2.0 Site Overview**

### **2.1 Site Location and Description**

The Site is located at 1250 Schweizer Road, Big Flats in the County of Chemung, New York and is identified as Section 57.02 Block 2 Lot 59.1 on the Town of Big Flats Tax Map. The Site is approximately 17.3-acres and bounded by County of Chemung Airport to the north, northwest, and west property owned by County of Chemung to the south, and vacant land owned by Best Corporate Park, LLC to the east. The BCP Area is limited to a 17.3-acre Site as indicated on Figure 2 (Fuss & O'Neill). The boundaries of the BCP Area consist of the flood control berm to the east, the property line (which coincides with the flood control berm) to the north and west, and the property line to the south.

### **2.2 Site History**

The property was undeveloped agricultural and pastureland until circa 1943, when Schweizer began light aircraft manufacturing operations. Throughout the 1950s the Schweizer facility approximately doubled in size. Steady growth of the facility continued during the 1960s and 1970s. During the early 1980s, the flood control berm was constructed around the improved area of the Schweizer property and a flood control basin to the south of the Site was also constructed. The airport runway to the south of the Site was also expanded to the east in the 1980s. The property was connected to public sewer in the late 1980s and additional Schweizer facility expansion was undertaken, in conjunction with the beginning of rotary aircraft manufacturing operations in 1983. The most recent addition to the facility, an approximate 14,400-square foot hangar was constructed in 2002 at the southwestern corner of the facility.

### **2.3 Identification of Standards, Criteria and Guidance**

The standards used to evaluate soil, groundwater, and soil vapor intrusion are as follows;

- Soil: Table 375-6.8(a) Unrestricted Use Soil Cleanup Objectives (SCOs) and Table 375-6.8 (b) Restricted Industrial Use and Applicable Groundwater Protection and Soil Cleanup Objectives (December 2006),
- Groundwater: Division of Water Technical and Operational Guidance Series Water Quality Standards and Guidance (TOGS 1.1.1.) (June 1998), and;
- Soil Vapor Intrusion: NYSDOH Guidance for Evaluating Soil Vapor Intrusion in the State of New York (October 2006).

### **2.4 Potential Areas of Concern**

As a result of previous investigations, 25 Potential Areas of Concern (PAOCs) were identified. PAOCs are areas where current or former processes created the potential for a release of regulated or hazardous substances to the environment. Subsurface investigations were completed at each PAOC and 22 were included in the Remedial Work Plan (R\T). These areas are presented and summarized below in Table I along with a description of the selected remedial action per PAOC as described in the Final RWP.

**Table I: Summary of PAOC's**

<b>PAOC Details</b>	<b>Release Detail</b>	<b>Selected Remedial Action</b>
PAOC 1: Vapor Degreaser and Primer paint booth Area	Sub-slab Volatile Organic Compound (VOC) concentrations in the soil vapor have been impacted to mitigate/monitor levels.	Installation of make-up air units at each of the six paint booth areas to eliminate the negative pressure gradient that had previously existed. This has reduced the potential for VOC vapors to enter the building through cracks, seams, and other openings in the slab. Monitoring of indoor air is conducted as outlined in the SMP.
PAOC 2: Former Facility Production Wells	No releases to the production wells were identified.	Monitoring of former production wells is conducted as outlined in the SMP.
PAOC 3: Brush Plating Area	No exceedances of Restricted Industrial SCOs.	Implemented an environmental easement restricting the Site to industrial use.
PAOC 4: Loading Docks and Scrap Metal Storage	Soil exceeded Restricted Industrial SCOs for semi-volatile organic compounds (SVOCs.)	Excavated soil that exceeded the Restricted Industrial SCOs for SVOCs and placed a new bituminous concrete surface.
PAOC 5: TCE Reclamation Unit	SVOCs exceed Restricted Industrial SCO values. Soil exceeded Groundwater SCO and groundwater exceeds TOGS 1.1.1 values for VOCs.	Excavated soil that exceeded the Restricted Industrial SCO for SVOCs and the Groundwater SCO for VOCs. Shallow and deep monitoring wells were installed in the southwest field to monitor the downgradient extent of the trichloroethylene (TCE) plume.
PAOC 6A: Pad-Mounted Transformer (East)	Soil exceeds Restricted Industrial SCOs for polychlorinated biphenyls (PCBs).	Excavated soil that exceeded the Restricted Industrial SCO for PCBs to the extent practicable by removing soil adjacent to the transformers by hand. Implemented an environmental easement and SMP to outline proper soil handling procedures should transformers be decommissioned and concrete slab removed.
PAOC 6B: Pad-Mounted Transformer (West)	Soil exceeded the Restricted Industrial SCO values for SVOCs.	Excavated soil that exceeded the Restricted Industrial SCOs for SVOCs and placed a new bituminous concrete surface. Implemented an environmental easement and SMP to outline proper soil handling procedures.
PAOC 7: "Oiling" Building	No exceedances of Restricted Industrial SCOs.	Implemented an environmental easement restricting Site to industrial use.
PAOC 8: Courtyard Dry Wells	Soil exceeded Restricted Industrial SCO values for metals and SVOCs.	Cleaned out the dry wells, removed soil that exceeds the Restricted Industrial SCOs, and placed a new concrete surface. Implemented an environmental easement and SMP to outline proper soil handling procedures.
PAOC 9: Stormwater Dry Wells	Sediment in stormwater dry wells does not exceed the Restricted Industrial SCOs.	Cleaned the dry wells as described in the Site's Stormwater Pollution Prevention Plan (SWPPP).

**Table I: Summary of PAOC's**

<b>PAOC Details</b>	<b>Release Detail</b>	<b>Selected Remedial Action</b>
PAOC 10/11: Paint Can Crushing Area	Soil exceeded the Restricted Industrial SCOs for metals and SVOCs.	Excavated soil that exceeded the Restricted Industrial SCOs for metals and SVOCs and placed a new bituminous concrete surface. Implemented an environmental easement and SMP to outline proper soil handling procedures.
PAOC 13: Northwest Field	Soil exceeds the Restricted Industrial SCOs for SVOCs.	Capped soil below the existing concrete pad and excavated soil that exceeded the Restricted Industrial SCO outside of the existing concrete pad. Implemented an environmental easement and SMP to outline proper soil handling procedures should concrete slab be removed.
PAOC 14: Sand Blasting Building	Soil exceeded the Restricted Industrial SCOs for metals.	Excavated soil that exceeded the Restricted Industrial SCOs for metals.
PAOC 15: Historical Leaching Field, North	One sample at a depth of seven feet below ground surface (bgs) exceeded the Restricted Industrial SCO for arsenic	Implemented an environmental easement and SMP to restrict the Site to industrial use and to outline proper soil handling procedures.
PAOC 16: Historical Leaching Field, South	No exceedances of Restricted Industrial SCOs.	Implemented an environmental easement restricting Site to Industrial Use.
PAOC 17: Former Burn Pit	Soil exceeded the Restricted Industrial SCOs for metals and SVOCs.	Capped soil below the existing concrete pad and excavated soil that exceeded the Restricted Industrial SCO outside of the existing concrete pad. Implemented an environmental easement and SMP to outline proper soil handling procedures should concrete slab be removed.
PAOC 18: Painting Shop Floor Sump	Soil exceeds Restricted Industrial SCO for arsenic at a depth of 9.5 feet bgs.	Cleaned and backfill the sump and floor drains. Implemented an environmental easement and SMP to restrict the Site to industrial use and to outline proper soil handling procedures should building slab be removed.
PAOC 19: Maintenance Area	No exceedance of Restricted Industrial SCOs.	Cleaned and backfilled the floor drains with concrete. Implemented an environmental easement and SMP to restrict the Site to industrial use and to outline proper soil handling procedures should the building slab be removed.
PAOC 21: Drainage Ditch	Groundwater downgradient of this area has not been impacted.	Implemented an environmental easement restricting Site to industrial use.
PAOC 22: Waste Oil Storage Area	Soil exceeded Restricted Industrial SCO for metals and SVOCs.	Excavated soil that exceeds the Restricted Industrial SCOs for SVOCs and metals.
PAOC 24: Machine Shop Stained Areas	Soil exceeds Restricted Industrial SCO for benzo(a)pyrene.	Implemented an environmental easement and SMP to restrict the Site to industrial use and to outline proper soil handling procedures should building slab be removed.
PAOC 25: Southwest Field	VOCs are present in the groundwater.	Shallow and deep monitoring wells were installed in the southwest field to monitor the downgradient extent of the TCE plume. Excavated the VOC groundwater source (PAOC 5).

## **2.5 Summary of Remedial Actions**

Fuss & O'Neill identified releases of constituents of concern (COC 5) warranting remedial action at 13 of 25 PAOCs as depicted on Figure 2. The remedial strategy at the Site followed a Track 4 cleanup under the BCP and consisted of source area removal, elimination of exposure pathways by either removing or rendering soils inaccessible that exceed the Restricted Industrial SCOs listed on Table 375-6.8(b), and the execution of an environmental easement to restrict the Site to industrial use. The specific remedial actions performed included the following:

- Excavation of soil in PAOCs that exceeded the Restricted Industrial SCOs as identified during remedial investigations;
- Excavation of soil from PAOC 5 that exceeded the Groundwater SCOs for VOCs to eliminate the source of VOCs to the groundwater and achieve plume stabilization;
- Collection and analysis of end-point soil samples to evaluate the performance of the remedial action with respect to attainment of the remedial goals;
- Appropriate off-Site disposal of all material removed from the Site in accordance with applicable Federal, State, and local rules and regulations for handling, transport, and disposal;
- Construction, installation, and/or maintenance of engineering covers consisting of the facility building slabs, bituminous concrete, concrete, or at least one foot of clean fill to prevent human exposure to residual impacted soil remaining at the Site;
- Recording of an environmental easement, including institutional controls, to restrict future exposure to any residual impacted soil remaining at the Site; and
- Preparation of a SMP for long term management of residual impacted soil as required by the environmental easement, including plans for: 1) institutional and engineering controls, 2) groundwater and indoor air monitoring, 3) operation, maintenance, and certification of established controls, and 4) reporting.

## **3.0 Performance Evaluation**

The remedial strategy followed a Track 4 cleanup under the BCP and consisted of source area removal, elimination of exposure pathways by either removing or rendering soils inaccessible that exceed the Restricted Industrial SCOs listed on Table 375-6.8(b), and the execution of an environmental easement to restrict the Site to industrial use.

Soil exceeding the Restricted Industrial SCO was previously removed from the Site as summarized in Section 2.3. The removal of source material resulted in a stabilization of the groundwater plume located at PAOC 5. Previous post-remediation groundwater sampling has shown that TCE concentrations stabilized.

In areas where materials exceeding the Restricted Industrial SCO remain, an engineered composite cover consisting of building slabs, bituminous concrete, concrete, and/or one foot of clean soil remains in place and continues to be effective in preventing human exposure to residual impacted soil remaining at the Site. Inspection and maintenance of the composite cover system is discussed in Section 5.1.

Past quarterly indoor air monitoring analytical results have shown that the make-up air units associated with the paint booths were effective in achieving the indoor air guideline values found in the NYSDOH Guidance for Evaluating Soil Vapor Intrusion in the State of New York. The make-up air units associated with the paint booths have been either removed or use discontinued since 2011. Inspection and maintenance of the air handling system is discussed in Section 5.1.

The institutional controls included in the environmental easement have been followed, with the exception of the noted variations in the following chapters and continue to be effective in minimizing potential exposure to remaining impacted material. The institutional controls are discussed in further detail in Section 4.2 and 4.3.

## **4.0 Institutional Control/Engineering Control Compliance Report**

### **4.1 Engineering Controls**

#### **4.1.1 Composite Cover System**

Exposure to residual impacted soil is prevented by a composite cover system placed over the Site. This cover system is comprised of bituminous concrete pavement, concrete slabs, concrete building slabs, and/or a minimum of 12 inches of clean soil.

The composite cover systems have remained essentially unchanged and continue to prevent exposure to residual impacted soils. Inspection and maintenance of the Site cover systems is discussed in Section 5.1.1.

#### **4.1.2 Air Handling System**

Make-up air units were installed in each of the six paint booth areas to provide outdoor air to replace air that is exhausted through the paint booth ventilation system. The make-up air units eliminated the negative pressure gradient that had existed inside the building prior to their installation. The elimination of the negative pressure gradient has reduced the potential for VOC vapors from entering the building through cracks, seams, and other openings in the building slab.

In September 2010 paint booths 2 and 3 were removed from the Site along with their associated make-up air units and use of the prime paint booth and the associated make-up air unit was discontinued. A Site plan showing the location of the former paint booths is included as Figure 2. The remaining paint booths were only used sporadically during 2011 and their use has since been discontinued. The make-up air units were sized to provide replacement air only for the air removed by its associated paint booth. Therefore, the make-up air units only needed to operate while the associated paint booth was in operation to be effective in preventing a negative pressure gradient from occurring within the facility. Monitoring of the air handling system is discussed further in Section 5.1.2.

### **4.1.3 Monitored Natural Attenuation**

Groundwater monitoring activities to assess natural attenuation were temporarily suspended, by permission from the NYSDEC via email dated December 19, 2013, pending Department review of the 2013 monitoring reports per a request submitted November 15, 2013. Per a letter from NYSDEC dated December 10, 2015, monitoring activities have been discontinued, the letter states “The Department also acknowledges that the groundwater and air monitoring programs have been completed and have documented groundwater standards have been met for offsite areas and asymptotic groundwater conditions have been reached in the onsite MW-9 Area. Groundwater use restrictions apply to this area of the site and if this area is redeveloped in the Future, then it is preferred that the source of the chromium in groundwater is identified and addressed at that time.”

The monitoring activities were scheduled to continue until residual groundwater concentrations were detected below NYSDEC standards or concentrations become asymptotic over an extended period. Groundwater monitoring had occurred quarterly since the remedial activities were completed, starting in January 2009 through September 2013 with the exceptions noted in Section 5.2.1.

### **4.2 Institutional Controls**

A series of institutional controls are required under the SMP to:

- 1) Implement, maintain, and monitor engineering control systems;
- 2) Prevent exposure to residual impacted soil by controlling disturbances of the subsurface; and,
- 3) Restrict the use of the Site to industrial uses only. Adherence to these institutional controls on the Site is required under the environmental easement and was implemented under the Site Management Plan. These institutional controls include:
  - Compliance with the environmental easement by the Grantor and the Grantor’s successors and assigns with all elements of the SMP;
  - All engineering controls must be operated and maintained as specified in the SMP;
  - A composite cover system consisting of bituminous concrete covered areas, concrete slabs, one foot of clean soil, and concrete building slabs must be inspected, certified, and maintained as required in the SMP;
  - All engineering controls on the Site must be inspected and certified at a frequency and in a manner defined in the SMP;
  - Groundwater and indoor air monitoring must be performed as defined in the SMP (discontinued because objectives were met); and

- Data and information pertinent to management for the Site must be reported at the frequency and in a manner defined in the SMP.
- 4) All future activities on the Site that will disturb residual contaminated material are prohibited unless they are conducted in accordance with the SMP.
  - 5) Prior to the construction of any enclosed structures located over areas that contain remaining VOC contamination and where the potential for soil vapor intrusion (SVI) exists, an SVI evaluation will be performed. The SVI evaluation will determine whether mitigation measures are necessary to eliminate potential exposure to vapors in the proposed structure. Alternatively, an SVI mitigation system may be installed as an element of the building foundation without first conducting an investigation.
  - 6) Areas of the Site located within the BCP area and outside of documented PAOCs that have not been investigated generally consist of areas covered with grass, pavement, or other building elements. The following procedures shall be followed if these cover systems are to be breached for maintenance or removed for redevelopment:
    - The area to be breached will be properly characterized to limit exposure to potentially impacted material, and to determine appropriate material handling and disposal methods.
    - If grossly contaminated source material is discovered either during characterization of the soil, or after the cover system has been breached, NYSDEC will be notified immediately and further work, if necessary; will follow the procedures outlined in the Excavation Work Plan included in the SMP.
    - Activities that breach these types of cover systems will be documented and included in the annual reporting.
    - A “de minimis” breach of the cover system or a breach created during maintenance type projects will be restored with cover material similar to the original cover. Replacement cover systems for more substantial breaches or replacement projects will be in accordance with the SMP.

### **4.3 IC/EC Certification**

The Institutional Control/Engineering Control Certification signed by a New York State licensed Professional Engineer is included in Appendix A.

## **5.0 Monitoring Plan Compliance Report**

The SMP required that quarterly performance monitoring be conducted for a minimum of one year following the issuance of the certificate of completion or until otherwise approved by NYSDEC and NYSDOH. The monitoring programs are summarized below in Table II.

**Table II: Media Monitoring Schedule**

Monitoring Program	Frequency	Matrix	Analysis
*Groundwater	Quarterly	Groundwater	TCL VOCs, Cd, Cr, Pb, As, and TCL SVOCs in select locations.
*Indoor Air	Quarterly	Air	TO-15 VOCs
Engineering Control System	Annually	N/A	N/A

\*As previously listed (4.1.2 and 4.1.3) this monitoring is no longer required.

## 5.1 Site-Wide Inspection

The SMP requires a Site-wide inspection to be performed on a regular schedule at a minimum of once a year. Site-wide inspections are also performed after all severe weather conditions that may affect the engineering controls or monitoring devices. The purpose of the Site wide inspection is to assess the following:

- Compliance with all institutional controls, including Site usage;
- An evaluation of the condition and continued effectiveness of the engineering controls;
- General Site conditions at the time of the inspection;
- The site management activities are being conducted, including, where appropriate, confirmation sampling and a health and safety inspection; and;
- Confirm that site records are up to date.

Following completion of the remedial work at the Site, Site-wide inspections have previously occurred quarterly in conjunction with the groundwater monitoring events on July 22, 2009, October 27, 2009, January 20, 2010, April 28, 2010, July 21, 2010, October 26, 2010, January 12, 2011, April 26, 2011, July 13, 2011, October 12, 2011, and January 10, 2012. The annual inspections for 2013, 2014, 2015, 2016, 2017, 2018, 2019, 2020 and 2021 were conducted in April 2013, April 2014, May 2015, April 2016, April 2017, July 2018, October 2019, October 2020, June 2021 and June 2022. The Institutional Controls & Site Management Inspection Form and the Engineered Control Inspection Form completed at the time of the 2022 inspection is included in Appendix B. No severe weather conditions which may have impacted the engineering controls have occurred since the remedial activities were completed.

### 5.1.1 Composite Cover System Monitoring

The composite cover system is an engineering control that restricts exposures to residual impacted soil above the Restricted Industrial SCOs. The cover systems are composed of either concrete, bituminous concrete, a minimum of one foot of clean fill, or the existing concrete building slabs. The horizontal extent of each cover system is depicted on the Site plan on Figure 2 (Fuss & O'Neill).

An inspection of the composite cover system is required, at minimum, annually as part of the Site-wide inspection; the 2022 annual inspection was performed on June 10, 2022. No unscheduled inspections were necessary since completion of the remedial activities at the Site.

During the inspection, the following issues were noted:

- Minor hairline (tight) surface cracks of the concrete surrounding MW-09 and the catch basins located at PAOC 8 was noted; no change from the 2021 inspection.
- Minor multiple surface cracking of the bituminous concrete cover with evidence of minor grass/weed growth located at PAOC 15 was noted; no change from the 2021 inspection.
- Minor chipping and flaking of concrete near the southern edge of PAOC 17; no change from the 2021 inspection.
- Multiple (5) minor cracks in pavement (1/2" to 2" wide) south of Warehouse 2 & 3 of PAOC 17; no change from the 2021 inspection.

None of the issues noted during the inspections substantively impact the functionality of the engineering controls however it has previously been recommended that the PAOC 15 & PAOC 17 cracks be cleaned, filled with approved crack filler and covered with sealer to prevent further damage to the cover. The composite cover system continues to prevent exposure to residual impacted soils. Photographs taken during the Site-wide inspection are presented in Appendix C.

### **5.1.2 Air Handling System Monitoring**

An inspection of the air handling system is required annually as part of the Site-wide inspection; the 2021 annual inspection was performed on June 10, 2022. No unscheduled inspections were necessary since completion of the remedial activities at the Site. Each make-up air unit is equipped with a Magnehelic® gauge used to measure back pressure. An increase in back pressure would indicate that the air filter needs to be replaced or other maintenance needs to be performed. At a minimum, annual maintenance is performed on the air handlers and includes replacement of all filters.

In September 2010 paint booths 2 and 3 were taken off-line and removed from the Site along with their associated make-up air units due to changes in the manufacturing operations at the Site. The prime paint booth and associated make-up air unit was also discontinued in September 2010; however, the paint booth and make-up air units remain installed at the site. The remaining paint booths and make-up air units (Booths #6, #7, and #10) were only used sporadically in 2011 and use of these booths was discontinued in 2012, they were restarted on December 20, 2020, after annual type maintenance was performed on the air handlers, which included replacement of all filters. The make-up air units were sized to provide replacement air only for the air removed by its associated paint booth. Therefore, the make-up air units only needed to operate while the associated paint booth was in operation; paint booths #6, #7, and #10 were in operation during the reporting period March 22, 2021, through June 30, 2022 on an as needed basis. A Copy of the completed Engineered Control Inspection Form is included in Appendix B.

## **5.2 Media Monitoring Program**

### **5.2.1 Groundwater Monitoring**

The SMP requires groundwater monitoring to be performed on a periodic basis to assess the performance of the remedy (for a minimum of one year following the issuance of the certificate of completion). The network of monitoring wells at the Site is designed to monitor both upgradient and downgradient groundwater conditions at the Site. The remedial goal for groundwater quality is to attenuate off-site contaminant migration and reduce off-site contaminant concentrations to TOGS 1.1.1 water quality standards.

Groundwater monitoring had previously been conducted quarterly beginning in January 2009, following the completion of the remedial activities at the Site. However, due to an oversight caused by the change of ownership the groundwater monitoring was not conducted during the 2012 reporting period (second, third & fourth quarters 2012 and first quarter 2013). The groundwater monitoring was resumed starting in April 2013 and was also conducted in September 2013 after which a request for elimination / reduction was prepared and submitted to NYSDEC on November 15, 2013. NYSDEC responded via email dated December 19, 2013, that the Quarterly sampling program may be temporarily suspended pending Department review of the request and results review (in large part due to offsite GW results being below drinking water standards and the buildings being unoccupied). Per a letter from NYSDEC dated December 10, 2015, monitoring activities have been discontinued, the letter states “The Department also acknowledges that the groundwater and air monitoring programs have been completed and documented groundwater standards have been met for offsite areas and asymptotic groundwater conditions have been reached in the onsite MW-9 Area. Groundwater use restrictions apply to this area of the site and if this area is redeveloped in the future, then it is preferred that the source of the chromium in groundwater is identified and addressed at that time.”

### **5.2.2 Indoor Air Monitoring Program**

Indoor Air Monitoring is required by the SMP to ensure the overall air quality in the facility, to demonstrate that the upgraded air handling system has successfully mitigated the potential for vapor intrusion, and to ensure concentrations of constituents of concern do not increase over time. Quarterly monitoring of indoor air was performed from April 2009 through September 2013 with the exception of the 2012 reporting period (second, third & fourth quarters 2012 and first quarter 2013) after which a request for elimination / reduction was prepared and submitted to NYSDEC on November 15, 2013. NYSDEC responded via email dated December 19, 2013, that the Quarterly sampling program may be temporarily suspended pending Department review of the request and the 2013 results (in large part due to offsite GW results being below drinking water standards and the buildings being unoccupied). Per a letter from NYSDEC dated December 10, 2015, monitoring activities have been discontinued. The indoor air monitoring program included quarterly samples collected from the following locations:

- Within the manufacturing area near the former vapor degreaser area (IA-01);
- Within the office area (IA-04);
- One background outdoor air sample is collected from the prevailing upwind location (OA-01 or OA-02).

Representative samples were collected in six-liter stainless steel Summa© canisters, equipped with regulators that control sample collection for a period of approximately two hours. Each sample was analyzed for volatile organics by EPA Method TO-15 list of parameters.

## 6.0 Operation and Maintenance Plan Compliance Report

Preventative maintenance was performed (August 20, 2020, prior to initial startup) on each of the make-up air units that comprise the air handling system. Preventative maintenance involved the following tasks:

- Replace the blower motor belts
- Grease the motor and blower pulley bearings
- Change the roof top intake filters
- Clean the Heat Rod for the burner unit using Scotch-Brite™
- Check intake housing for debris and clean as necessary
- Check exhaust stack and damper for obstructions and make sure that it opens properly
- Check exhaust stack pressure sensor tubes for cracks or breaks and replace as necessary
- Check interior exhaust filters (1<sup>st</sup>, 2<sup>nd</sup>, and 3<sup>rd</sup> stage) and change as necessary
- Check booth lights and change T5 bulbs as necessary
- Check doors for proper operation

Preventative maintenance measures have been reinstated since the initial startup of the paint booths on December 20, 2020 and is performed on an as needed basis.

### 6.1 Operation and Maintenance Completion Summary

Preventative maintenance of the paint booths/make-up air units, as described above in Section 6, was performed following the initial re-startup of the paint booths on December 20, 2020. A table summarizing the dates the preventative maintenance was performed is included below as Table III.

**Table III: Summary of Preventative Maintenance Completion**

<b>Paint Booth #</b>	<b>Preventative Maintenance Dates</b>
Prime Line	N/A*
#2	N/A*
#3	N/A*
#6	8/20/2020; **7/9/21
#7	8/20/2020; **7/12/21, 9/22/21, 11/16/21, 12/21/21, 1/31/22, 3/23/22, 5/17/22
#10	8/20/2020; **12/21/21, 1/31/22, 2/15/22, 4/14/22

\* The Prime Line, #2, and #3 paint booths were taken out of service prior to the first annual service due date.

\*\* Dates filters were changed during June 30, 2021-June 30, 2022 reporting period.

Painting operations have been restated at the site with paint booths #6, #7 and #10 currently in service, although on an as needed basis. Going forward, at a minimum, as needed preventive maintenance will be performed on these three booths. Paint booths Prime Line, #2 and #3 no longer exist or are operational.

## **7.0 Conclusions and Recommendations**

Site-wide inspections have been performed since January 2009 (quarterly initially then annually thereafter). The site wide inspections have verified compliance with the Site's institutional controls and shown that the engineering controls continue to be effective. The composite cover system continues to prevent exposure to residual impacted soils. The make-up air units were effective in minimizing the potential for migration of soil vapors into the indoor air while painting operations occurred at the site. Painting operations had ceased at the site until recently December 2020 and therefore operation of the make-up air units is again necessary and has resumed.

### **7.1 Groundwater Monitoring**

Groundwater monitoring was conducted quarterly starting in January 2009, following the completion of the remedial activities at the Site, with the exception of the 2012 reporting period (second, third & fourth quarters 2012, and first quarter 2013), which was an oversight due to the change of ownership. The concentration and size of the TCE plume at PAOC 5 has decreased and groundwater results at MW-07S and MW-11S met the TOGS 1.1.1 standards in the last six sampling events conducted in April, July, and October 2011, January 2012, April and September 2013. Based on this data a request for elimination / reduction was prepared and submitted to NYSDEC on November 15, 2013. NYSDEC responded via email dated December 19, 2013, that the Quarterly sampling program may be temporarily suspended pending Department review of the request and 2013 results (in large part due to offsite GW results being below drinking water standards and the buildings being unoccupied-at the time). Per a letter from NYSDEC dated December 10, 2015, monitoring activities have been discontinued.

Chromium impacts exceeding the TOGS 1.1.1 standard have been observed at MW-09 (which is located within a former source area) in 10 out of 14 quarterly sampling events that occurred from January 2009 through September 2013. Seasonal fluctuations of chromium levels had been observed, with the highest chromium concentrations observed during the April 2011 sample event when groundwater was at its highest observed elevation at MW-09. No exceedances of TOGS 1.1.1 standards for metals have been observed in any other sampling location following remediation activities at the Site. The NYSDEC December 10, 2015, letter authorizing the discontinuation of monitoring activities states: "The Department also acknowledges that the groundwater and air monitoring programs have been completed and have documented groundwater standards have been met for offsite areas and asymptotic groundwater conditions have been reached in the onsite MW-9 Area. Groundwater use restrictions apply to this area of the site and if this area is redeveloped in the Future, then it is preferred that the source of the chromium in groundwater is identified and addressed at that time."

### **7.2 Indoor Air Monitoring**

Quarterly monitoring of indoor air has been performed since April 2009 with the exception of the 2012 reporting period (second, third & fourth quarters 2012, and first quarter 2013), which was an oversight due to the change of ownership. As previously reported by Fuss & O'Neill, one slight exceedance of the NYSDOH guidance value of 0.005 mg/m<sup>3</sup> for TCE occurred at IA-01 with a reported concentration of 0.0054 mg/m<sup>3</sup> during the April 27, 2010, sampling event; however, a duplicate sample collected demonstrated concentrations of TCE an order of magnitude lower than the primary sample and well below the guidance value with a reported concentration of 0.00054 mg/m<sup>3</sup>. There have not been any

other exceedances of the guidance values in indoor air samples collected at the site. The anomalous detected concentration of TCE in the primary sample at IA-01 in April 2010 may be attributed to residual contaminants in the laboratory provided summa canisters. Per a letter from NYSDEC dated December 10, 2015, monitoring activities have been discontinued.

### **7.3 Proposed Modifications to the Site Management Plan**

No modifications to the Site Management Plan are recommended at this time with the exception of the reduced monitoring requested in November 2013. The current monitoring program, outlined in the Site Management Plan, will be followed (with the exception of the approved suspension of the quarterly groundwater and indoor air monitoring).

Sikorsky manufacturing operations at the facility have ceased. Portions of the facility are now occupied (leased) by: Tungsten Sources, LLC (Metadyne 1 & 2) lease old hanger/shop/offices and center of building shop area, Danella Line Service (utility line installer – lease small outbuilding in southeast corner of property for equipment and supplies storage), Alfred Technology Lease (office space), NY State Assemblyman Chris Friend offices, BEST, LLC & Emission Logistics, LLC (sister companies to BEST Corporate Park – offices, shops & outbuildings), Mark Tota (Electrician) space in outbuilding, Greenstar (janitorial & light building maintenance – facilities room), and all Best Family of Companies (BEST Corporate Park, LLC (hanger, old high bay & out buildings), Emission Logistics, LLC, Boss Security (office & storage space), and Ward Apparatus).

### **7.4 Future SMP Reporting**

As previously stated, On July 10, 2018, Chemung County Industrial Development Agency (CCIDA) transferred ownership of the 1250 Schweizer Road property to Best Corporate Park, LLC. The transfer of real property included the 17.3-acre portion within the BCP program. On August 7, 2018, the 30-Day Post Transfer and Proof of Filing, submitted by Bousquet Holstein, PLLC attorneys for CCIDA, is provided in Appendix D of the 2018 Periodic Review Report. Future monitoring and reporting required under the SMP will be completed by:

BEST Corporate Park, LLC  
1250 Schweizer Road  
Horseheads, New York 14845

# FIGURES

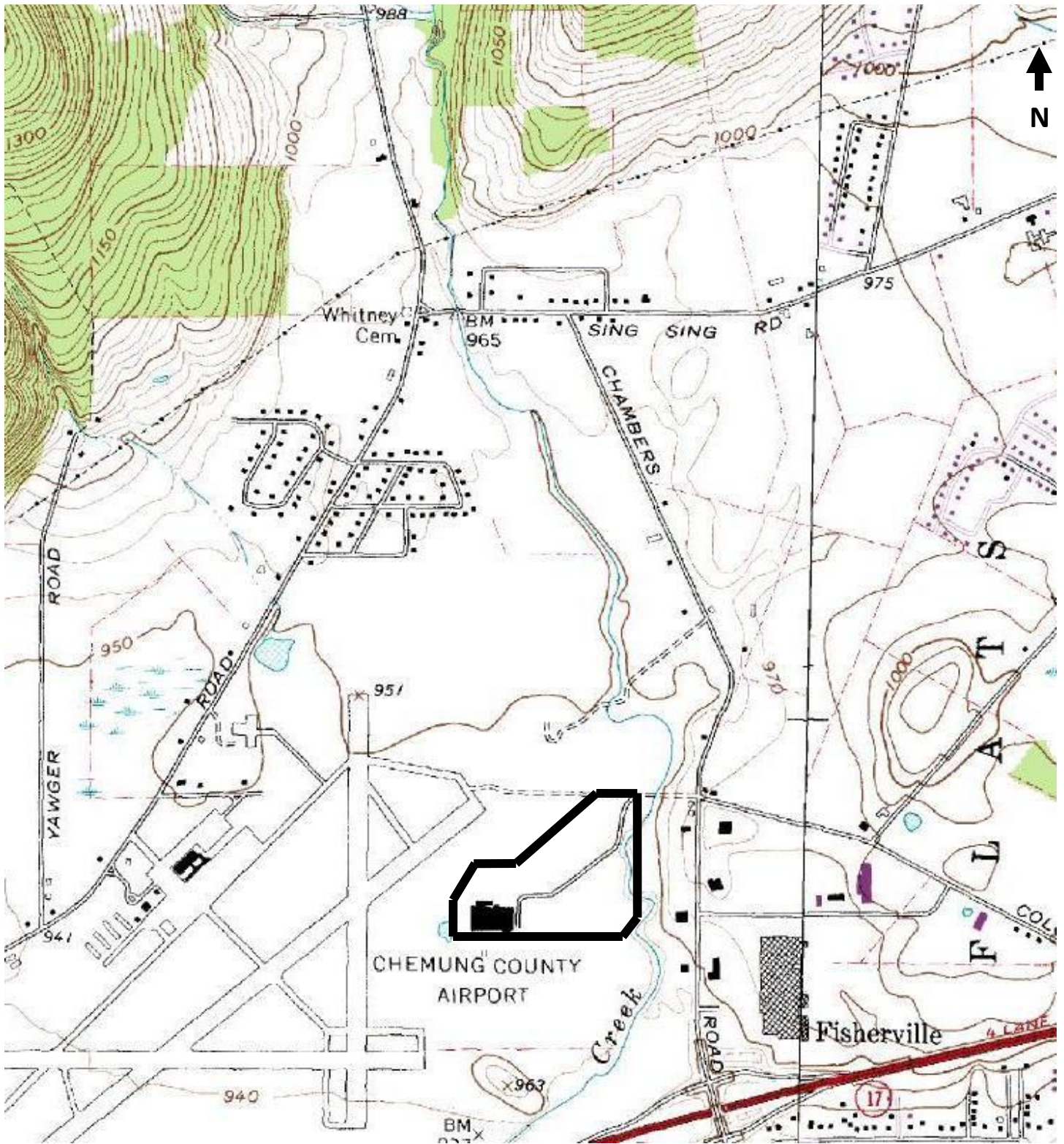
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Schweizer Aircraft Corporation  
 1250 Schweizer Road  
 Big Flats, New York

Job No. 2013-039

April 2013

**Figure 1**  
**Site Location Map**  
 (USGS 1976)



113 East Chemung Place  
 Elmira, NY 14904  
 Phone (607) 734-2165  
 Fax (607) 734-2169  
[www.FaganEngineers.com](http://www.FaganEngineers.com)



# **APPENDIX A**

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## **IC/EC Certification**



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**Enclosure 2**  
**NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION**  
**Site Management Periodic Review Report Notice**  
**Institutional and Engineering Controls Certification Form**



	Site Details	Box 1	
<b>Site No.</b>	<b>C808033</b>		
<b>Site Name Schweizer Aircraft Corporation</b>			
Site Address: 1250 Schweizer Road    Zip Code: 14845			
City/Town: Big Flats			
County: Chemung			
Site Acreage: 17.3			
Reporting Period: June 30, 2021 to June 30, 2022			
		YES	NO
1.	Is the information above correct?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
If NO, include handwritten above or on a separate sheet.			
2.	Has some or all of the site property been sold, subdivided, merged, or undergone a tax map amendment during this Reporting Period?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3.	Has there been any change of use at the site during this Reporting Period (see 6NYCRR 375-1.11(d))?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4.	Have any federal, state, and/or local permits (e.g., building, discharge) been issued for or at the property during this Reporting Period?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>If you answered YES to questions 2 thru 4, include documentation or evidence that documentation has been previously submitted with this certification form.</b>			
5.	Is the site currently undergoing development?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		<b>Box 2</b>	
		YES	NO
6.	Is the current site use consistent with the use(s) listed below? Industrial	<input checked="" type="checkbox"/>	<input type="checkbox"/>
7.	Are all ICs/ECs in place and functioning as designed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>IF THE ANSWER TO EITHER QUESTION 6 OR 7 IS NO, sign and date below and DO NOT COMPLETE THE REST OF THIS FORM. Otherwise continue.</b>			
<b>A Corrective Measures Work Plan must be submitted along with this form to address these issues.</b>			
_____ Signature of Owner, Remedial Party or Designated Representative		_____ Date	

**Box 2A**

YES NO

8. Has any new information revealed that assumptions made in the Qualitative Exposure Assessment regarding offsite contamination are no longer valid?

 YES  NO

**If you answered YES to question 8, include documentation or evidence that documentation has been previously submitted with this certification form.**

9. Are the assumptions in the Qualitative Exposure Assessment still valid?  
(The Qualitative Exposure Assessment must be certified every five years)

 YES  NO

**If you answered NO to question 9, the Periodic Review Report must include an updated Qualitative Exposure Assessment based on the new assumptions.**

SITE NO. C808033

**Box 3****Description of Institutional Controls**ParcelOwnerInstitutional Control

57.02-2-59.1

BEST Corporate Park, LLC

Ground Water Use Restriction  
Soil Management Plan  
Landuse Restriction  
Monitoring Plan  
Site Management Plan  
O&M Plan  
IC/EC Plan

The soil cover and air handling systems are operated, maintained, inspected and certified at a frequency and a manner specified in the Department approved Site Management Plan (SMP).

**Box 4****Description of Engineering Controls**ParcelEngineering Control

57.02-2-59.1

Vapor Mitigation

### Periodic Review Report (PRR) Certification Statements

1. I certify by checking "YES" below that:

a) the Periodic Review report and all attachments were prepared under the direction of, and reviewed by, the party making the certification;

b) to the best of my knowledge and belief, the work and conclusions described in this certification are in accordance with the requirements of the site remedial program, and generally accepted engineering practices; and the information presented is accurate and complete.

YES NO

2. If this site has an IC/EC Plan (or equivalent as required in the Decision Document), for each Institutional or Engineering control listed in Boxes 3 and/or 4, I certify by checking "YES" below that all of the following statements are true:

(a) the Institutional Control and/or Engineering Control(s) employed at this site is unchanged since the date that the Control was put in-place, or was last approved by the Department;

(b) nothing has occurred that would impair the ability of such Control, to protect public health and the environment;

(c) access to the site will continue to be provided to the Department, to evaluate the remedy, including access to evaluate the continued maintenance of this Control;

(d) nothing has occurred that would constitute a violation or failure to comply with the Site Management Plan for this Control; and

(e) if a financial assurance mechanism is required by the oversight document for the site, the mechanism remains valid and sufficient for its intended purpose established in the document.

YES NO

**IF THE ANSWER TO QUESTION 2 IS NO, sign and date below and DO NOT COMPLETE THE REST OF THIS FORM. Otherwise continue.**

**A Corrective Measures Work Plan must be submitted along with this form to address these issues.**

\_\_\_\_\_  
Signature of Owner, Remedial Party or Designated Representative

\_\_\_\_\_  
Date

IC CERTIFICATIONS  
SITE NO. C808033

Box 6

**SITE OWNER OR DESIGNATED REPRESENTATIVE SIGNATURE**

I certify that all information and statements in Boxes 1,2, and 3 are true. I understand that a false statement made herein is punishable as a Class "A" misdemeanor, pursuant to Section 210.45 of the Penal Law.

I Fagan Engineers &  
Randy Sheffler, Land Surveyors, at 113 E. Chemung Place, Elmira, NY 14904,  
print name print business address

am certifying as Owner's Representative (Owner or Remedial Party)

for the Site named in the Site Details Section of this form.

*Randy J. Sheffler*

July 20, 2022

Signature of Owner, Remedial Party, or Designated Representative  
Rendering Certification

Date

**IC/EC CERTIFICATIONS**

**Box 7**

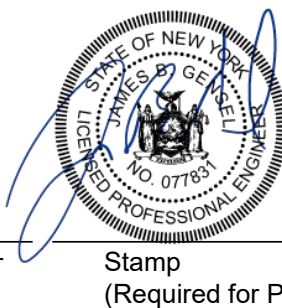
**Professional Engineer Signature**

I certify that all information in Boxes 4 and 5 are true. I understand that a false statement made herein is punishable as a Class "A" misdemeanor, pursuant to Section 210.45 of the Penal Law.

I Fagan Engineers &  
James B. Gensel, Land Surveyors, PC at 113 East Chemung Place, Elmira, NY 14904,  
print name print business address

I am certifying as a Professional Engineer for the Owner-BEST Corporate Park, LLC  
(Owner or Remedial Party)

  
\_\_\_\_\_  
Signature of Professional Engineer, for the Owner or  
Remedial Party, Rendering Certification



\_\_\_\_\_  
Stamp  
(Required for PE)

July 20, 2022  
\_\_\_\_\_  
Date

# **APPENDIX B**

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## **IC / EC Inspection Form**



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5) Is a current copy of the Site Management Plan, including all DEC approved revisions, maintained on-site?

Yes No

If no, describe: \_\_\_\_\_  
\_\_\_\_\_

### INSPECTION LIMITATIONS

Describe any conditions that limited the completeness of this inspection (e.g., part of the slab in Bldg. 11 was covered by stored materials): Part of slab in PAOC 18 (west side of wall) was partially covered by tenant stored materials. Part of slab in warehouse #3 PAOC 4 & PAOC 17 was covered with stored materials. Part of PAOC 10/11 was covered with stored materials. Part of PAOC 24 slab was covered with stored materials.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

### CORRECTIVE MEASURES

If any of the answers to items 1 through 5 was “No”, please complete the CORRECTIVE MEASURES section below and append additional pages or documentation, as necessary.

Description of corrective measures: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**ENGINEERED CONTROL INSPECTION FORM**  
**Schweizer Aircraft Corp**

Inspector: Randy Sheffler

Inspection Date: June 10, 2022

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**COMPOSITE ENGINEERED CONTROL OBSERVATIONS**

- |     |  |     |                          |
|-----|--|-----|--------------------------|
| 1)  | Damage to the Concrete Floor Slab (PAOC 4)?  | Yes | <input type="radio"/> No |
|     | If yes, describe: _____  |     |                          |
| 2)  | Damage to the Bituminous Concrete Cover (PAOC 4)?  | Yes | <input type="radio"/> No |
|     | If yes, describe: _____  |     |                          |
| 3)  | Damage to the Soil Cover (PAOC 4)?   | Yes | <input type="radio"/> No |
|     | If yes, describe: _____  |     |                          |
| 4)  | Damage to the Concrete Floor Slab (PAOC 6b)?   | Yes | <input type="radio"/> No |
|     | If yes, describe: _____  |     |                          |
| 5)  | Damage to the Bituminous Concrete Cover (PAOC 6b)?   | Yes | <input type="radio"/> No |
|     | If yes, describe: _____  |     |                          |
| 6)  | Damage to the Concrete Floor Slab (PAOC 8)   | Yes | <input type="radio"/> No |
|     | If yes, describe: _____  |     |                          |
| 7)  | Damage to the Concrete Slab (PAOC 8)?  | Yes | <input type="radio"/> No |
|     | If yes, describe: <u>Minor hairline (tight) surface cracks noted at grates (no change)</u> |     |                          |
| 8)  | Damage to the Concrete Floor Slab (PAOC 10/11)?  | Yes | <input type="radio"/> No |
|     | If yes, describe: _____  |     |                          |
| 9)  | Damage to the Concrete Slab (PAOC 10/11)?  | Yes | <input type="radio"/> No |
|     | If yes, describe: _____  |     |                          |
| 10) | Damage to the Bituminous Concrete Cover (PAOC 10/11)?                                      | Yes | <input type="radio"/> No |
|     | If yes, describe: _____  |     |                          |

- 11) Damage to the Bituminous Concrete Cover (PAOC 15)?  Yes  No  
 If yes, describe: Multiple minor surface cracks with some vegetation growth-no change.
- 12) Damage to the Soil Cover (PAOC 15)? Yes  Yes  No  
 If yes, describe: \_\_\_\_\_
- 13) Damage to the Concrete Floor Slab (PAOC 17)? Yes  Yes  No  
 If yes, describe: \_\_\_\_\_
- 14) Damage to the Bituminous Concrete Cover (PAOC 17)?  Yes  No  
 If yes, describe: Multiple (5) cracks ½ - 2" wide observed in asphalt largest appears to have been expansion cut that has expanded – no change from prior inspections.
- 15) Damaged Concrete Floor Slab (PAOC 18)? Yes  Yes  No  
 If yes, describe: \_\_\_\_\_
- 16) Damage to the Concrete Floor Slab (PAOC 24)? Yes  Yes  No  
 If yes, describe: \_\_\_\_\_

**AIR HANDLING SYSTEM ENGINEERED CONTROL OBSERVATION**

- 17) What is the measured backpressure in the make-up air unit in the Prime Paint Booth?  
Not Applicable unit / booth no longer exists.  
 If the back pressure is less than 0.75 or greater than 1.75, what corrective measures are being taken?  
 \_\_\_\_\_  
 \_\_\_\_\_
- 18) What is the measured back pressure in the make-up air unit in the Paint Booth #2?  
Not Applicable unit / booth no longer exists.  
 If back pressure is less than 0.60 or greater than 1.60, what corrective measures are being taken?  
 \_\_\_\_\_  
 \_\_\_\_\_

19) What is the measured back pressure in the make-up air unit in the Paint Booth #3?

Not Applicable unit / booth no longer exists.

If back pressure is less than 0.60 or greater than 1.60, what corrective measures are being taken? \_\_\_\_\_

\_\_\_\_\_

20) What is the measured back pressure in the make-up air unit in the Paint Booth #6?

Not operating at the time of inspection. Latest recorded pressure was 0.23, on 6/9/2022

If back pressure is less than 0.80 or greater than 1.80, what corrective measures are being taken? Not applicable per operator

\_\_\_\_\_

21) What is the measured back pressure in the make-up air unit in the Paint Booth #10?

Not operating at the time of inspection. Latest recorded pressure was 0.20, on 6/9/2022

If back pressure is less than 0.80 or greater than 1.80, what corrective measures are being taken? Not applicable per operator

\_\_\_\_\_

22) What is the measured back pressure in the make-up unit in the Paint Booth #7)?

Not operating at the time of inspection. Latest recorded pressure was 0.23, on 6/9/2022

If back pressure is less than 0.90 or greater than 1.90, what corrective measures are being taken? Not applicable per operator

\_\_\_\_\_

**INSPECTION LIMITATIONS**

Describe any conditions that limited the completion of the inspection (e.g., part of the slab in Bldg. 11 was covered by tenant’s stored materials): Part of slab in PAOC 18 (west side of wall) was partially covered by tenant stored materials. Part of slab in warehouse #3 PAOC 4 & PAOC 17 was covered with stored materials. Part of PAOC 10/11 was covered with stored materials. Part of PAOC 24 slab was covered with stored materials.

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**CORRECTIVE MEASURES**

If any of the answers to items 1 through 12 were “Yes”, please complete the CORRECTIVE MEASURES section below and append additional pages or documentation, as necessary.

Date repairs were completed: \_\_\_\_\_ (Should be less than 30 days from inspection date.)

Description of corrective measures: Although items number 11 and 14 answers are yes, the minor cracks observed June 10, 2022 have been noted as being there since 2013-2014 and have not changed (worsened) therefore no corrective action is recommended at this time.

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Post-Repairs Inspection:      Date: \_\_\_\_\_      Inspector: \_\_\_\_\_

# **APPENDIX C**

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## **Photographs**



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1.) PAOC 4 Concrete Floor Slab



2.) PAOC 4 Bituminous Concrete Cover



3.) PAOC 4 Soil Cover



4.) PAOC 6b Concrete Slab(s)



5.) PAOC 6b Concrete Floor Slab(s)



6.) PAOC 6b Bituminous Concrete Cover



7.) PAOC 8 Concrete Slab



8.) PAOC 8 Concrete Slab Minor Hairline Crack



9.) PAOC 10/11 Concrete Floor Slab (North)



10.) PAOC 10/11 Concrete Floor Slab (South)



11.) PAOC 10/11 Concrete Slab



12.) PAOC 10/11 Bituminous Concrete Cover



13.) PAOC 15 Bituminous Concrete Cover



14.) PAOC 15 Soil Cover - West



15.) PAOC 15 Soil Cover - East



16.) PAOC 17 Concrete Floor Slab (Warehouse #3 SE Corner)



06.10.2022

17.) PAOC 17 Concrete Slab



06.10.2022

18.) PAOC 17 Bituminous Concrete



06.10.2022

19.) PAOC 17 Bituminous Concrete Crack



06.10.2022

20.) PAOC 17 Bituminous Concrete Crack



21.) PAOC 17 Bituminous Concrete Cracks



22.) PAOC 17 Bituminous Concrete Crack



23.) PAOC 18 Concrete Floor Slab Cover – North – East Side



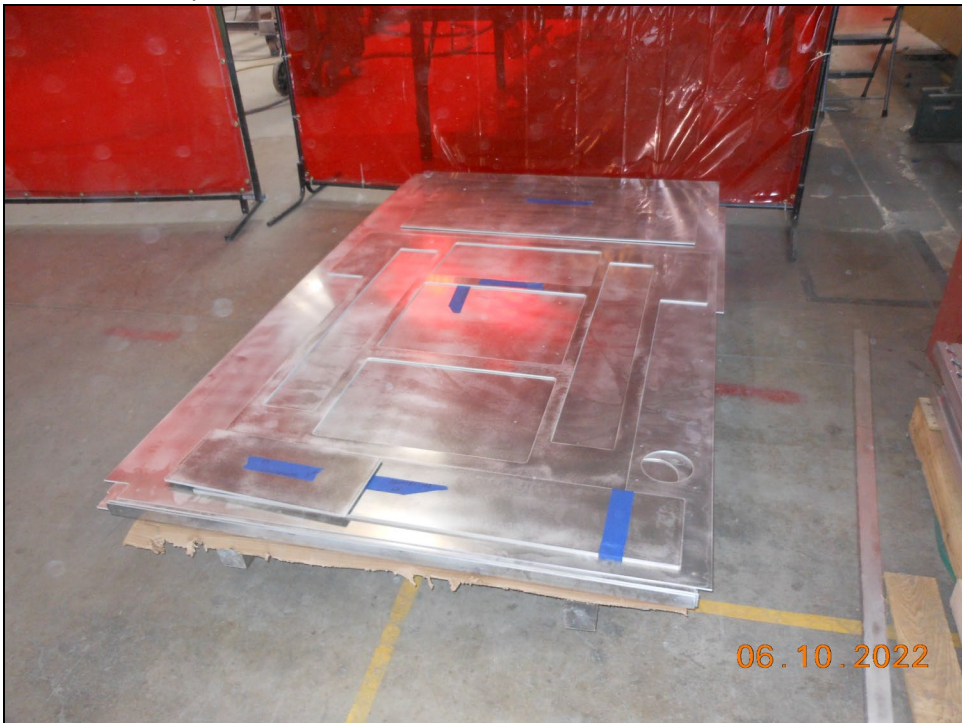
24.) PAOC 18 Concrete Floor Slab Cover – North – West Side



25.) PAOC 18 Concrete Floor Slab Cover – South Side



26.) PAOC 24 Concrete Floor Slab Cover – North Area



27.) PAOC 24 Concrete Floor Slab Cover – South Area



28.) Site Copy of SMP