NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Division of Environmental Remediation, Region 8
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Via E-mail

Mr. Dennis Maguire
770 Rock Beach Road
Rochester, NY 14617

September 27, 2019

Re: Proposed Amendment to IRM Work plan
Former Alliance Metal Stamping and Fabrication Site #c828101
Gates, Monroe County

The New York State Department of Environmental Conservation (NYSDEC), in consultation with New York State Department of Health, has completed its review of the document entitled "Proposed Amendment to the IRM Work Plan" for Former Alliance Metal Stamping & Fabrication Facility Site #828101, dated 5 September 2019.

The proposed change in methods to modify recharge well #2 (RW-2) is accepted.

Notice to proceed is granted and the Amendment, along with this letter must be attached to the approved IRM Work Plan in the document repository.

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

Sincerely,

Timothy Schneider, P.E.
Professional Engineer 1

D. Pratt
B. Schilling
D. Loew
J. Kenny / J. Deming
P. Sylvestri
T. Wells

Stantec Consulting Services Inc.
61 Commercial Street, Suite 100, Rochester, NY 14614-1009

September 5, 2019
File: 190500647

Attention: Mr. Timothy A. Schneider, P.E.
New York State Department of Environmental Conservation
Division of Environmental Remediation, Region 8
6274 East Avon-Lima Road
Avon, NY 14414

Reference: Proposed Amendment to the IRM Work Plan
BCP Site #C828101 - Former Alliance Metal Stamping & Fabrication Facility
12 Pixley Industrial Parkway, Town of Gates, Monroe County, New York

Dear Tim,

On behalf of Maguire Family Properties, Inc. (MFP), Stantec presents this request for approval of an amendment to the Interim Remedial Measures Work Plan (the Work Plan). The Work Plan was submitted to the Department on 28 June 2019 and was approved with modifications described in your letter of 24 July 2019.

This amendment is submitted at the Department's request to address a comment on the Work Plan received by the Department in a letter from The West Firm dated August 21, 2019 (RE: Former AMSF Site, Site No. C828101, Draft Site Management Plan). The letter requested (first paragraph on page 4) that Stantec provide details on how water displaced during the planned plugging of the deeper sections of recharge well RW-2 would be managed such that it does not discharge to shallow bedrock. This amendment provides the requested details.

The section of the Work Plan which describes the procedures to be followed for completing the planned modification of the deeper sections of recharge well RW-2 is Section 3.2.2. The following revision of Work Plan Section 3.2.2 is proposed:

(Note: 'bgs' in the following text is an abbreviation of 'below ground surface'.)

3.2.2 Planned Remedial Modification

The following activities are planned to permanently plug the deeper bedrock sections of RW-2:

The well casing and uncased bedrock-lined well bore will be cleaned to a target depth of approximately 149 ft bgs. The cleanout will be performed using air-rotary drilling methods. Air-rotary methods have been selected (rather than water- or mud-rotary) to minimize the loss of drilling fluid and suspended solids into the high-permeability shallow bedrock intervals at the top of the well bore. A temporary casing will be installed to seal off the shallow and intermediate bedrock sections of the well during the cleanout and grouting of the deep bedrock section of the well. To provide hydraulic control and further minimize the potential for leakage of water into the annular space of the well bore above the bottom of

the temporary casing during placement of grout, a pipe installed to below the depth of the static water table will be used to pump water from the well at a rate approximately equivalent to the rate at which grout is being tremmied into the well.

- The drilling procedures for the cleaning of the well will be as follows:
    - A temporary extension will be installed on the top of the well casing to extend the casing above ground surface.
    - A 5-inch air hammer bit will be advanced to clean the 6-inch diameter well casing and upper section of the open well bore to a depth of 60 ft bgs.
    - The drill string will be removed and a 4-inch inside diameter temporary casing will be installed to a bottom depth of 60 ft bgs. The outside of the bottom end of the casing string will be equipped with a flexible wrap to seal off the section of the well bore above the bottom of the casing.
    - The remaining section of the well bore will be cleaned using a 3-7/8 diameter air rotary bit.
    - The actual final cleanout depth may be less than the target depth if obstructions present in the well are resistant to removal using conventional air-rotary drilling equipment and methods.
    - Groundwater and solids generated by the drilling activity will be captured at ground surface and containerized for subsequent waste characterization and appropriate off-site disposal.
- Once the well has been cleaned out to the target depth (as feasible), the drill string will be withdrawn and replaced with a tremie pipe string, and a volume of cement grout sufficient to plug the well from its bottom to a depth of approximately 60 ft bgs will be installed using tremie methods.

  The temporary casing will remain in place during the tremie grouting activities. As feasible, a separate pipe or hose attached at the surface to a water pump will be inserted inside the temporary casing to a depth below the static (pre-drilling-activities) water level. The pipe and pump will be used to remove water from the top of the water column in the temporary casing at a rate equal to or slightly greater than the rate at which grout and chase water are pumped into the tremie pipe.
- Water and solids produced from the well by the well-cleanout and grouting activities will be containerized for waste characterization and appropriate off-site disposal.
- The actual depth of the top of the grout plug may be different if significant intervals of high permeability are found to occur between the well bottom and 60 ft bgs. The depth to the top of the grout plug will be measured 12 hours after installation. If the depth to the top of the plug is

significantly greater than 60 feet, the NYSDEC project manager will be contacted to discuss whether placement of additional grout should be performed.

- Drilling and grouting activities will be performed by an experienced environmental drilling services company. Monitoring and documentation of the field activities and of the conditions encountered will be performed by the environmental consultant's personnel (an experienced environmental geologist, scientist or engineer).

Plugging activities and results will be documented in the IRM CCR.

(End of proposed revision)

Closing

Please contact us if you have any questions or need additional information. We'll look forward to your response.

Regards,

STANTEC CONSULTING SERVICES INC.

Thomas D. Wells
Sr. Environmental Geologist
Phone: (585) 413-5271
Tom.Wells@stantec.com

ec: D. Maguire (MFP), P. Sylvestri (HSE), F. Sowers, B. Schilling, M. Cruden & D. Loew (DEC), J. Kenney (DOH), S. Tucker (OBG), L. Hall (ITT), D. Harrienger & M. Storonsky (Stantec), M. Peters (West Firm), J. Henry (WOH)

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