NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Division of Environmental Remediation, Region 8
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February 8, 2018

Kristin Jones
Newell Rubbermaid, Inc.
3 Glenlake Park
Atlanta, Georgia 30328

Subject: Former Bernzomatic Facility (#C837018)
Village of Medina, Towns of Shelby and Ridgeway, Orleans County
Supplemental Remedial Investigation Work Plan, January 2018

Dear Ms. Jones:

The New York State Departments of Environmental Conservation and Health (Departments) have completed their review of the Supplemental Remedial Investigation Work Plan (SRIWP) submitted January 23, 2018 for the Bernzomatic site. The SRIWP is for additional surface soil sampling, sediment sampling in the pond, and cistern surface water and sediment sampling to further characterize impacts at the site. In accordance with 6 NYCRR 375-1.6, the Departments have determined that the SRIWP, with the following modifications, substantially addresses the requirements of the Brownfield Cleanup Program:

1. A full ASP Category B data package will be prepared by the laboratory for all samples. The data will be reviewed and a Data Usability Summary Report (DUSR) will be prepared, in accordance with DER-10 Section 2.2(a).

2. The 2”-12” interval samples from SS-04, SS-05, SS-06, and SS-07 will be analyzed along with the surface soil (0-2”) interval samples. The deeper sample will not be held. This will help define nature and extent for the site and evaluate potential exposures if the soil cover (1 foot for industrial sites) is disturbed.

3. All supplemental work will follow the Health and Safety Plan from the RIWP. In addition, a CAMP will be implemented during ground intrusive activities in accordance with Section 9.0 of the RIWP.

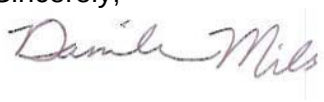
4. Table 1: Samples SS-04 to SS-07 will be sampled from 0-2” and 2”-12”. Samples SED-04 to SED-07 will be sampled from 0-6” and 6”-12”.

5. Figure 1: Dibenz(a,h)anthracene was also detected in surface soil sample MW-15 at a concentration of 1.5 ppb, which is above the Industrial Use Soil Cleanup Objective.

With the understanding that the modified SRIWP is agreed to, the SRIWP is hereby approved. Please attach this letter to the front of the SRIWP and place a copy in the document repository for the site.

The schedule within the SRIWP states field work will begin in February. Please notify the Departments at least 7 days in advance of any field activities. If you have any questions or concerns, please contact me at (585) 226-5349 or danielle.miles@dec.ny.gov.

Sincerely,



Danielle Miles, EIT
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Jeff Stravino, Hodgson Russ LLP

URS

January 23, 2018

Ms. Danielle Miles
New York State Department of Environmental Conservation, Region 8
6274 East Avon-Lima Road
Avon, NY 14414-9516

Re: Remedial Investigation Report, 2018 Supplemental Work Plan, Brownfield Cleanup Program
Former Bernzomatic Facility, Site #C837018
1 Bernzomatic Drive, Medina, New York

Dear Ms. Miles:

On behalf of Irwin Industrial Tool Company c/o Newell Brands Inc., URS Corporation (URS), an AECOM Company, is providing this 2018 Supplemental Remedial Investigation Work Plan (SRIWP) for the Brownfield Cleanup Program (BCP) Former Bernzomatic Facility, Site #C837018, Village of Medina, NY. This letter has been prepared in response to New York State Department of Environmental Conservation (NYSDEC) review comments received in a letter dated December 8, 2017 pertaining to the draft *Remedial Investigation Report* (RIR) (August 2017) for the former Bernzomatic facility.

In February and March 2017, URS performed RI fieldwork at the Site. The results of that BCP investigation along with previous investigations at the Site were detailed in the draft RIR for the former Bernzomatic Facility submitted to the NYSDEC on August 11, 2017. Upon review of the draft RIR, the NYSDEC determined that the extent of semi-volatile organic compounds (SVOC) in surface soils and SVOCs and metals in sediments is not sufficiently delineated at the Site. This SRIWP describes the proposed additional sample collection activities and the associated laboratory analyses that will be performed to address NYSDEC comments on the draft RIR with respect to additional surface soil, sediment and cistern sampling.

The activities addressed in this SRIWP will follow the procedures described in the previously NYSDEC-approved *Remedial Investigation Work Plan* (RIWP) for the Former Bernzomatic Facility NYSDEC BCP Site (URS, November 2016). Any adjustments to RIWP field procedures to accommodate response to NYSDEC comments on the draft RIR are discussed herein.

SCOPE OF WORK

URS plans to collect the following samples to respond to NYSDEC comments on the draft RIR with respect to further delineation of SVOCs in surface soil and SVOCS and metals in sediments at the Site:

- Four surface soil samples (0-2") – SS-04, SS-05, SS-06, and SS-07 for SVOCs (SW-846 8270D);

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- Four subsurface soil samples (2”-12”) - SS-04, SS-05, SS-06, and SS-07 for SVOCs (SW-846 8270D); these will be held on contingency at the lab, pending the results of the new surface soil samples and other 2”-12” samples;
- Three subsurface soil samples (2”-12”) at the SS-01, SS-02, and SS-03 locations for SVOCs (SW-846 8270D);
- Eight additional sediment samples in the cistern overflow pond for SVOCs (SW-846 8270D), Target Analyte List (TAL) metals (SW-846 6010C/7471B), and Total Organic Carbon (TOC) (Lloyd Kahn). Sediment samples will be collected at four locations along the edge (3 locations) and center (1 location) of the pond and will be analyzed for the 0-6” and 6-12” intervals;
- One cistern surface water sample for SVOCs (SW-846 8270D) and TAL metals (SW-846 6010C/7470A); and,
- One cistern sediment sample (if possible) SVOCs (SW-846 8270D), TAL metals (SW-846 6010C/7471B), and TOC (Lloyd Kahn).

The attached Table 1 provides a summary of the proposed sample and analytical matrix.

Following NYSDEC approval of this SRIWP, URS will mobilize personnel and equipment to the Site. An internal project kick-off meeting will be held to familiarize the field team with the site background and potential hazards, health and safety requirements, emergency protocols, and other field procedures. URS will provide at least two weeks prior notice to NYSDEC before beginning field work. URS will contact the former Bernzomatic Facility on-site contact (Mike Ridley) to coordinate the schedule of work. It is anticipated that the work will be performed in Level D personal protection.

Surface and Subsurface Soil Sampling:

The goal of the additional surface soil sampling is to delineate further horizontal and vertical SVOC impacts in the area(s) where SVOC impacts exceeded the Industrial Use Soil Cleanup Objectives (SCO) as shown on Table 4 and Figure 6 of the draft RIR. The additional surface soil locations are shown on the attached Figure 1.

Four surface soil samples exceeded the Industrial Use SCO for SVOCs during the February-March 2017 RI: MW-15 (0-2”), SS-01(0-2”), SS-02 (0-2”), and SS-03(0-2”). Three of these locations (SS-01, SS-02, and SS-03) did not have any samples deeper than the (0-2”) interval. To delineate these locations vertically, URS will collect samples for SVOC analyses from the 2”-12” interval at SS-01, SS-02, and SS-03, attempting to sample as close to the original collection location as feasible using field note references recorded at the time of original sample collection. To delineate horizontally, URS plans to collect four additional surface (0-2”) and subsurface (2”-12”) soil samples for SVOC analyses approximately 15 feet from the Industrial Use SCO exceedance locations in the direction of the property boundary (see attached Figure 1). The 2”-12” interval samples at these new locations will be put on hold at the lab and analyzed on a case by case basis.

All soil samples will be inspected for evidence of contamination (e.g., odors, staining, etc.) and screened for organic vapors using a photoionization detector (PID). Surface soil samples (0-2") will be collected by removing vegetative cover and using a stainless steel trowel according to the surface soil sampling methods as described in Section 5.1 of the RIWP. Samples from 2"-12" will be collected using a stainless steel hand auger. For each discrete sample interval, the soil sample will be homogenized in a pre-cleaned stainless steel bowl prior to filling the respective laboratory container. The samples will be placed into laboratory provided sample jars, and packed on ice for delivery to the laboratory in accordance with the RIWP Appendix C – Quality Assurance Project Plan (QAPP).

One field duplicate and one matrix spike/matrix spike duplicate pair for the soil matrix will also be collected. The field duplicate and MS/MSD samples will be collected and managed in accordance with Section 3.2 of the RIWP and Section 4.3.2 of the RIWP QAPP. No trip blanks are planned as they are not required for sample sets that do not contain aqueous volatile organic compound (VOC) samples.

One rinse blank will be collected for sample collection equipment associated with soil sampling. The rinse blank sample will be submitted for SVOC analysis. The rinse blank will be collected and managed in accordance with Section 3.2 of the RIWP and Section 4.3.1 of the RIWP QAPP.

Field sampling equipment (e.g. trowels, hand auger, etc.) will be decontaminated prior to use and between sampling locations. Decontamination fluids will be managed in accordance with Section 8.0 of the RIWP. Any surplus soil collected for homogenization but not used for the analytical sample will be returned to the ground surface in the area from which it was collected.

Pond Sediment Sampling:

Four additional sediment samples will be collected from the cistern overflow pond for SVOCs, metals, and TOC at the following locations (see attached Figure 1):

- Northeast corner of the pond, near the pond's edge;
- Southwest corner of the pond, near the pond's edge;
- West side of the pond, near the pond's edge; and,
- In the center of the pond.

URS anticipates that a small, flat-bottom boat or similar small watercraft will be necessary to collect the sediment samples proposed herein. Samples will be collected for SVOCs and metals from the 0-6" and 6"-12" intervals at each location.

Sediment samples will be collected by pushing or driving a 2-inch diameter Wilco® stainless steel sediment hand corer with Lexan® tube (or similar device) vertically into the sediment of the pond. The recovered sediment will be managed in accordance with Section 6.2 of the RIWP, including separating the recovered sample into discrete intervals for 0-6" and 6"-12" sample collection. For each discrete sample interval, the soil sample will be homogenized in a pre-cleaned stainless steel bowl prior to filling

the respective laboratory container. The samples will be placed into laboratory provided sample jars and packed on ice for delivery to the laboratory in accordance with the RIWP QAPP.

One field duplicate and one matrix spike/matrix spike duplicate pair for the sediment matrix will also be collected. The field duplicate and MS/MSD samples will be collected and managed in accordance with Section 3.2 of the RIWP and Section 4.3.2 of the RIWP QAPP. No trip blanks are planned as they are not required for sample sets that do not contain aqueous VOC samples.

One rinse blank will be collected for sample collection equipment associated with sediment sampling. The rinse blank sample will be submitted for SVOC, TAL metals, and TOC. The rinse blank will be collected and managed in accordance with Section 3.2 of the RIWP and Section 4.3.1 of the RIWP QAPP.

Field sampling equipment (e.g., Wilco® stainless steel sampler, stainless steel spoons, etc.) will be decontaminated prior to use and between sampling locations. Decontamination fluids will be managed in accordance with Section 8.0 of the RIWP. Any surplus sediment collected for homogenization but not used for the analytical sample will be containerized and managed in accordance with Section 8.2 of the RIWP.

Cistern Water and Sediment Sampling:

Cistern Water

Roof drains discharge into a cistern system located beneath the former manufacturing building onsite. On October 29, 2014, a water sample was collected from the cistern for VOCs as part of a Phase II investigation. The only VOC detected was trichlorofluoromethane at 0.54 J micrograms per liter. The measured depth to the bottom of the cistern was 10 feet below the access hatch. URS plans to collect one sample of cistern water and one sample of cistern sediment for SVOCs and TAL metals (see attached Figure 1).

The cistern water and sediment samples will be collected through the access hatch located on the east side of the cistern. Field personnel will collect a water sample by using a new disposable polyethylene bailer lowered into the cistern by rope. Water quality parameters including temperature, dissolved oxygen (DO), oxidation-reduction potential (ORP), pH, specific conductance, and turbidity will be obtained from a grab sample prior to collecting the analytical sample using a YSI water quality meter (or similar). The bailer will be used to fill the laboratory containers for SVOCs and metals. The samples will be packed on ice for delivery to the laboratory in accordance with the RIWP QAPP.

One field duplicate and one matrix spike/matrix spike duplicate pair for the aqueous matrix will also be collected. The field duplicate and MS/MSD samples will be collected and managed in accordance with Section 3.2 of the RIWP and Section 4.3.2 of the RIWP QAPP. No trip blanks are planned as they are not required for sample sets that do not contain aqueous VOC samples.

Sediment

If there is sufficient sediment in the bottom of the cistern, one sample will be collected by pushing or driving a 2-inch diameter Wilco® stainless steel sediment hand corer with Lexan® tube (or similar device) vertically into sediment on the bottom of the tank. If there is sediment present, but by volume or nature insufficient for a tube-type sampler, an attempt will be made to collect a sediment sample using a Ponar sampler as described in Section 6.2.1.1 of the RIWP. If the sediment is very sparse or very fine, successful collection of a sediment sample may not be possible.

If a sediment sample is successfully collected, the recovered sediment will be managed in accordance with Section 6.2 of the RIWP, including separating the recovered sample into discrete intervals for 0-6" and 6"-12" sample collection. For each discrete sample interval, the sediment sample will be homogenized in a pre-cleaned stainless steel bowl prior to filling the respective laboratory container. The samples will be placed into laboratory provided sample jars and packed on ice for delivery to the laboratory in accordance with the RIWP QAPP.

The sediment matrix field duplicate, MS/MSD pair, and rinse blank are planned for the pond sample, so no duplicate or MS/MSD pair is planned for cistern sediment. No trip blanks are planned as they are not required for sample sets that do not contain aqueous VOC samples.

Field sampling equipment (e.g., Wilco® stainless steel sampler, stainless steel spoons, etc.) will be decontaminated prior to use and between sampling locations. Decontamination fluids will be managed in accordance with Section 8.0 of the RIWP. Any surplus sediment collected for homogenization but not used for the analytical sample will be containerized and managed in accordance with Section 8.2 of the RIWP.

Sample Management:

Samples will be shipped on ice or delivered in person under standard chain of custody procedures to TestAmerica laboratories, Inc. in Buffalo, NY as identified in the previously approved RIWP QAPP.

Decontamination:

Field sampling equipment will be decontaminated according to the procedures outlined in Section 8.1.2 (Small Equipment Decontamination) of the RIWP.

Waste (IDW) Management:

Excess sediment or decontamination water will be handled according to Section 8.2 of the RIWP. It is anticipated that there will be minimal IDW generated by these sampling efforts and that any IDW generated during the performance of this SRIWP will be added to existing solid/liquid drums generated during the RI.

Schedule:

The anticipated schedule for the work:

- SRIWP submission – January 23, 2018
- Conduct additional sampling event – February 2018 (weather permitting)
- Receipt of laboratory report – March 2018
- Update and resubmission of the RIR – May 2018

Reporting:

Following completion of the additional sampling and receipt of the laboratory analytical results, URS will prepare a revised RIR, and address other outstanding comments presented in the December 8, 2017, NYSDEC letter. The updated report will be submitted to the NYSDEC within 60 days of completion of SRIWP field work.

If you have any questions, comments, or require any additional information, please do not hesitate to contact me at (716) 923-1300 or Galina Georgiew at (312) 596-6775.

Sincerely,

URS Corporation, an AECOM Company

James L. Kaczor, P.G.
Task Leader

Attachments: Table 1 – SRIWP Analytical Matrix
Figure 1 – SRWIP Sample Locations

cc: Galina Georgiew, URS, Project Manager
Frank Sowers, NYSDEC
Bernette Schilling, NYSDEC
Justin Deming, NYSDOH
Angela Martin, NYSDOH
Kristin Jones, Irwin Industrial Tool Company
Jeff Stravino, Hodgson Russ

Table 1

Sampling Matrix
Former Bernzomatic Facility Supplemental RI Work Plan
Medina, NY

Sample ID	Matrix / Parameters					
	Soils	Surface Water		Sediment		
	SVOCs (8270D)	SVOCs (8270D)	TAL Metals (6010C & 7470A)	SVOCs (8270D)	TAL Metals (6010C & 7471B)	TOC (Lloyd Kahn)
SS-01	1					
SS-02	1					
SS-03	1					
SS-04	2					
SS-05	2					
SS-06	2					
SS-07	2					
SED-04				2	2	2
SED-05				2	2	2
SED-06				2	2	2
SED-07				2	2	2
SW-Cistern		1	1			
SED-Cistern				2	2	2
Monitoring Subtotal	**11**	**1**	**1**	**10**	**10**	**10**
QA/QC						
Duplicates [(1)]	1	1	1	1	1	1
Matrix Spike [(1)]	1	1	1	1	1	0
Matrix Spike Duplicate [(1)]	1	1	1	1	1	0
Trip Blanks	0	0	0	0	0	0
Rinse Blank [(2)]	1	1	1	1	1	1
Total Per Sampling Event	**15**	**5**	**5**	**14**	**14**	**12**

Notes:
(1) Duplicates, Matrix Spike, and Matrix Spike Duplicate samples will be collected at a rate of 1 per 20 samples.
(2) Rinse Blanks will be taken on a basis of 1 per media.
MW - monitoring well
TAL - Target Analyte List
SS - surface soil
SW - surface water
SED - sediment
SVOC - semi-volatile organic compound
TOC - total organic carbon
QA/QC - quality assurance/quality control

N

EAST CENTER ST

BERNZOMATIC DR

MW-17
MW-18
SB-06
MW-16
MW-09
SB-05A
SB-04
MW-06
SB-05
SB-03
MW-08
MW-10
MW-05
MW-07
SB-02
SB-01
SB-07
MW-21
MW-11
MW-20
MW-19
SB-08
MW-04
MW-02
SW- Cistern
SED-Cistern
MW-12
MW-01
MW-03
SB-09
MW-14
MW-13

SS-04

MW-15 (0" - 2")	CRIT 1	CRIT 2	CRIT 3	02/17
SVOCs:				
Benzo(a)pyrene	1	22	1.1	6.8

and dibenz(a,h)anthracene

SS-01 (0" - 2")	CRIT 1	CRIT 2	CRIT 3	03/17
SVOCs:				
Benzo(a)pyrene	1	22	1.1	10
Benzo(b)fluoranthene	1	1.7	11	15

SS-05
SS-01 (2" - 12")

SS-02 (0" - 2")	CRIT 1	CRIT 2	CRIT 3	03/17
SVOCs:				
Benzo(a)pyrene	1	22	1.1	2.5

SS-02 (2" - 12")
SS-06
SW-01
SED-01
SED-05
SED-06
SED-04
SW-02
SED-02
SED-03

SS-03 (0" - 2")	CRIT 1	CRIT 2	CRIT 3	03/17
SVOCs:				
Benzo(a)pyrene	1	22	1.1	7.5
Benzo(b)fluoranthene	1	1.7	11	11

SS-03 (2" - 12")
SS-07

Legend

- Proposed SRI Surface Soil Sample
- Proposed SRI Surface Water Sample
- Proposed SRI Sediment Sample
- Previous Soil Boring
- RI Surface Water Sample/ RI Sediment Sample
- RI Surface Soil Sample
- Existing Monitoring Well
- Cistern

120 0 120 Feet

CRIT 1: 6 NYCRR Part 375.6, Remedial Program Soil Cleanup Objectives, Effective 12/14/06. Unrestricted Use, including CP-51 Table 1, Effective 12/2/10.
CRIT 2: 6 NYCRR Part 375.6, Remedial Program Soil Cleanup Objectives, Effective 12/14/06. Restricted Use. Protection of Groundwater, including CP-51 Table 1, Effective 12/2/10.
CRIT 3: 6 NYCRR Part 375.6, Remedial Program Soil Cleanup Objectives, Effective 12/14/06. Protection of Public Health, Industrial, including CP-51 Table 1, Effective 12/2/10.

Source: NYS Digital Ortho-Imagery Program, Orleans County, 2015

FORMER BERNZOMATIC FACILITY
SUPPLEMENTAL REMEDIAL INVESTIGATION
SS, SED, CISTERN SAMPLE LOCATIONS

URS

FIGURE 1

J:\Projects\25369237\GIS\Maps\PROPOSED SAMPLING LOCS (011718).mxd 1/19/2018