



**Department of
Environmental
Conservation**

KATHY HOCHUL
Governor

AMANDA LEFTON
Acting Commissioner

April 24, 2025

Jeffrey Stanek
ITT Corporation
56 Technology Drive
Irvine, California 92618

Re: Remedial Investigation
Supplemental Sediment Sampling Work Plan
Goulds Pumps Facility Site
Site No.: C850013
Seneca (T), Seneca (C)

Dear Mr. Stanek:

The New York State Department of Environmental Conservation (Department) has completed a review of the Supplemental Sediment Sampling Work Plan (Work Plan) dated March 31, 2025, for the Goulds Pumps Facility Site (Site) located at 240 Fall Street, Seneca Falls, New York. Based on the information presented in the Work Plan, the Work Plan is conditionally approved based on the clarifications and modifications presented below.

1. The Department understands that there are a total of twelve (12) sampling locations; five (5) locations will be sampled Upstream of Outfall 001, two (2) locations will be sampled around Outfall 001, and five (5) locations will be sampled Downstream of Outfall 001.
2. The Department understands that samples at SED-001 will be collected in 1-foot intervals between 5-feet and 8-feet below mud level (bml).
3. The Department understands that all Upstream sampling locations, all Downstream sampling locations, and the additional sampling location near Outfall 001 will each have samples collected from: 0 – 6 inches and 6 – 12 inches for the first one (1) foot bml, and in 1-foot intervals thereafter, from 1 – 5 feet bml.
4. All samples will additionally be analyzed for PCBs via EPA Method 8082.
5. The Department understands that the augmented Health and Safety Plan with the Job Safety Analysis will be submitted to the Department prior to the start of fieldwork.
6. The Department understands that the Site's current QAPP continues to apply to all site work including the proposed sediment sampling.

7. Figure 2: The Work Plan states that there are a total of 12 sampling locations, but Figure 2 only shows 11 of the sampling locations. The Department understands that the twelfth (12th) sediment sampling location is at SED-001.

Within fifteen (15) days of the date of this letter and prior to any associated fieldwork activities, the Applicant must elect in writing (electronic notification is acceptable) one of the following options:

- Option A: Accept the modified report;
- Option B: Invoke dispute resolution as set forth in 6 NYCRR Part 35-1.5(b)(2); or
- Option C: Terminate the Brownfield Cleanup Agreement in accordance with 6 NYCRR Part 375-3.5.

If the Applicant chooses to accept Option A then this letter becomes part of the approved Supplemental Sediment Sampling Work Plan dated March 31, 2025. Also, if Option A is chosen then a copy of the approved Supplemental Sediment Sampling Work Plan dated March 31, 2025, along with this letter attached must be placed in the document repository within 1-week of accepting Option A. Please provide notification to the Department that the approved Supplemental Sediment Sampling Work Plan dated March 31, 2025, and a copy of this letter have been placed in the document repository (electronic notification is acceptable).

If the applicant elects Option A, then a schedule outlining a timeline for sampling and reporting will need to be supplied to the NYSDEC within 14-days of the acceptance notification date for this letter.

If you have any questions or concerns about this letter or need further assistance with the Site, please feel free to contact me at (585) 226-5349 or via email at Joshua.Ramsey@dec.ny.gov.

Sincerely,



Joshua J. Ramsey
Project Manager

ec:

Bradley Kubiak (Ramboll)
Scott Tucker (Ramboll)
Deborah Wright (Ramboll)
David Pratt (NYSDEC)
Michael Ormanoski (NYSDEC)
Sean Madden (NYSDEC)

Mr. Joshua J. Ramsey
New York State Department of Environmental Conservation, Region 8
6274 East Avon-Lima
Avon, NY 14414-9519

Re: Goulds Pumps Facility Site (C850013)
Supplemental Sediment Sampling Work Plan

Dear Mr. Ramsey:

This letter presents the proposed Supplemental Sediment Sampling Work Plan on behalf of ITT LLC (ITT) for the Goulds Pumps Facility Site (Site #C850013) as outlined in the February 28, 2024 letter report that summarized sediment sampling results to the New York State Department of Environmental Conservation (NYSDEC).

Date March 31, 2025

Introduction

On May 19, 2015, ITT submitted a Remedial Investigation Report (O'Brien & Gere, 2015; RIR) for the Goulds Pumps facility site (Site) located at 240 Fall Street, Town of Seneca Falls, Seneca County, New York (**Figure 1**) to the NYSDEC and the New York State Department of Health (NYSDOH) for review and approval. The RIR included the presentation and assessment of analytical results for 14 sediment samples collected at five locations in the Cayuga-Seneca Canal (canal) at depths ranging from 0 to 2 feet below mudline (ft bml, i.e., the surface of the water/sediment interface) (**Figure 2**). Sampling results are discussed below and presented on **Figure 2**.

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On June 8, 2022, NYSDEC provided comments to the RIR and conditionally approved the RIR pending agreement by ITT to incorporate revisions to the RIR to address NYSDEC comments. On June 17, 2022, ITT notified NYSDEC that ITT will accept the comments and modify the RIR, and during a July 6, 2022 call, NYSDEC indicated that the future Remedial Alternatives Analysis Report (RAAR) would need to address impacts to sediment in the canal south of the Site.

In response to a NYSDEC RIR comment requesting additional sediment sampling in the canal, a letter work plan was submitted to NYSDEC on September 21, 2022 (Ramboll, 2022). The work plan proposed collection of an additional 42 samples of canal sediment at seven locations to further characterize sediment quality upstream, adjacent to, and downstream of location SED-001 based on concentrations detected during the April 2014 RIR sampling event. The work plan was approved by NYSDEC on January 10, 2023 and sampling was completed on August 14, 2023.

Sediment metal concentrations from the 2015 Remedial Investigation and the 2023 sampling event were categorized based on the sediment classification categories (i.e., Class A, Class B, and Class C) described in NYSDEC's 2014 *Screening and Assessment of Contaminated Sediment* guidance document. In general, these sediment categories indicate the following (see NYSDEC 2014 for more details):

- Class A – If the concentration of a contaminant in sediment is below the Class A Sediment Guidance Value (SGV), the contaminant can be considered to present little or no potential for risk to aquatic life
- Class B – If the concentration of a contaminant lies between the SGVs that define Class A and Class C, additional information is needed to determine the potential risk to aquatic life
- Class C – If the concentration of a contaminant is above the SGV that defines this class, there is a higher potential for the sediments to impact aquatic life

As shown on **Figure 2**, concentrations of copper, lead, mercury, nickel, and zinc were detected above Class C thresholds at Outfall 001 during the RIR. The 2023 sediment sampling event identified concentrations of cadmium, chromium, copper, lead, mercury, nickel, silver and zinc above Class C thresholds at Outfall 001 and one or more of the metals at locations immediately downstream and upstream of Outfall 001.

The goal of this Supplemental Sediment Sampling Work Plan is to further delineate the extent of impacted sediment in the canal through sampling.

Utility Locating, Health and Safety Plan, and Quality Control Plan

Locating of public subsurface utilities on the land adjacent to the proposed sample locations will be completed prior to initiating intrusive activities in the canal. The locating will be completed by UDIG NY. If a private utility is identified that leaves shore and heads in the general direction of a proposed sampling location, the sample location will be moved so that the potential utility pathway is at least 10 feet from the sample location.

Prior to the start of work activities, Ramboll will augment the existing Site Health and Safety Plan (HASP) with a Job safety Analysis (JSA) to account for the proposed field activities. This HASP and JSA will be followed during field work activities.

Sampling procedures will be in accordance with applicable state guidance, the January 2013 Remedial Investigation Work Plan (RIWP) and the associated Quality Control Plan (QCP) (Appendix B of the RIWP, Ramboll 2013).

Investigation Sample Collection and Handling

Prior to the collection of sediment samples in the canal, a permit will be acquired from the NYS Canal Corporation to conduct work within the main canal channel. A permit is not required for work located in the backwater channel of the canal.

Sediment samples will be collected from up to 12 locations total. Specific locations are as follows and approximate locations proposed on **Figure 2**:

- Upstream – Samples will be collected from up to five locations upstream of Outfall 001: three samples in the main canal channel and two samples in the backwater channel
- Outfall 001 and adjacent – SED-001 will be sampled deeper than 5 ft bml and samples will be collected from one additional location near Outfall 001
- Downstream – Samples will be collected from up to five locations downstream of Outfall 001

At each location, sediment sample collection will be attempted from multiple depth intervals. With the exception of SED-001 location, each location will be sampled from 0 to 0.5 ft bml, 0.5 to 1 ft bml, and in 1-ft intervals up to 5 ft bml, or refusal. The sample at Outfall 001 will be collected in 1-ft intervals from 5 ft bml up to 8 ft bml or refusal, based on concentrations observed at 5 ft bml during the 2023 sampling event.

Sample locations inaccessible by foot will be collected via a boat utilizing a vibracore sampling device. Sampling at locations accessible by foot will be completed utilizing hand sampling equipment (e.g., Macro-Core® sampling system and/or slide hammer). All sample locations will be documented using a Trimble GeoXH Geographic Positioning System (GPS) unit or equivalent.

Samples collected from the 0 to 0.5 ft bml and 0.5 to 1 ft bml intervals at each location will be analyzed for Target Analyte List (TAL) metals, mercury, grain size, and percent moisture. Percent moisture will then be analyzed at each interval from each sample location and grain size will be analyzed at each interval from half of the sample locations. The remaining samples will be placed on hold pending results receipt. TAL metals sediment analyses will then be conducted using a stepwise approach. If the upper sample from a location is reported with a Class B or Class C concentration (NYSDEC, 2014) for one or more analytes then the next deeper sample interval will be released for analysis of the analyte(s) with that concentration. This stepwise analysis will continue at each location until the analytes are all within the Class A sediment category or the last sample is analyzed.

Laboratory Analyses

Sediment samples will be analyzed for TAL metals via USEPA Method 6010C, mercury via USEPA Method 7471B, total organic carbon by Lloyd Kahn, grain size via ASTM D422, and percent moisture via SM2540G. Sample turnaround time will be expedited to meet holding times for samples that have been placed on hold.

Analyses will be conducted by Eurofins Environmental Testing Northeast in Buffalo, NY, a NYSDOH Environmental Laboratory Approval Program (ELAP) certified laboratory, under chain-of-custody procedures as outlined in the QCP.

Field Quality Control Sampling

Field duplicates, field blanks (also called equipment blanks), and matrix spikes/matrix spike duplicates (MS/MSD) will be analyzed to assess the quality of the data resulting from this sampling plan. Quality

Control (QC) samples will be collected in accordance with the QCP and packaged and shipped to the laboratory at the same time as the "parent" sediment samples. Sediment QC samples are as follows:

Field Duplicates: Field duplicate samples are analyzed to check for sampling and analytical reproducibility. The general frequency will be one field duplicate for every 20 investigative samples collected (frequency of 5%).

Field Blanks: Field blanks are analyzed to check for procedural contamination at the Site that may cause sample contamination or contamination of sampling equipment obtained from equipment providers and check decontamination methods of non-disposable sampling equipment (i.e., stainless steel mixing bowl). Field blanks will be prepared in the field, using laboratory-grade deionized water, by allowing the water to flow over/through the samplers and into sample containers with the appropriate preservative. The general frequency of field blank will be one field blank per day of sampling.

Matrix Spikes/Matrix Spike Duplicates: Matrix spikes provide information about the effect of the sample matrix on the preparation and measurement methodology. For organics, the matrix spikes are performed in duplicate and are hereinafter referred to as MS/MSD samples. For inorganic parameters, one matrix spike is collected and analyzed. One MS/MSD or matrix spike will be collected for every 20 sediment samples.

Sampling Equipment Decontamination Procedures

All non-disposable field sampling equipment will be field decontaminated at the start of each day, after each sample, and at the end of each day. Sediment sampling equipment will be decontaminated in the field in accordance with the following procedures:

1. Laboratory grade detergent (e.g., Alconox®) and tap water; scrub to remove visual contamination
2. Generous tap water rinse
3. 10% nitric acid solution rinse
4. Distilled/deionized water rinse

Residual Management and Investigation Derived Waste

Disposable field sampling equipment will be collected in plastic garbage bags and disposed of as non-hazardous industrial waste in a receptacle at the ITT Goulds Pumps facility. Decontamination fluids will be collected and stored in a DOT-approved (or equivalent) container(s) for characterization and disposal.

Unused sediment will be containerized in a DOT-approved (or equivalent) container(s), analyzed to establish waste classification, and disposed of in accordance with applicable federal and state regulations.

DOT-approved (or equivalent) containers will be stored on ITT property in a location that is accessible for pick-up and approved by ITT staff.

Sample Management, Validation, Data Deliverables, and Reporting

Samples will be collected following the guidelines outlined in the Site QCP. Samples will be labeled in the field with the sample identification, date collected, time collected, analytical parameters requested, preservative used, and sampler's name or initials. Sediment sample identification for nomenclature will generally be derived from the sample location followed by the depth interval in feet bml and then the date the sample was collected (e.g., SED-004-0-1-093022). The information provided on the sample label will also be recorded on a field form and on the sample chain-of-custody form.

Data validation will be completed on the samples and a Data Usability Summary Report (DUSR) will be generated based on the QA/QC results.

Following receipt of the complete analytical data package and DUSR, a letter report presenting the sampling results will be prepared for submittal to NYSDEC. This letter report will document the sampling activities, provide the completed field forms, and field measurements, and summarize the sediment analyses results. The complete analytical data packages and the DUSR will be provided in appendices to the report.

Implementation Schedule

Sampling will be scheduled after NYSDEC approval of this work plan, approval of New York State Canal Corporation permits, and subject to subcontractor availability. Ramboll will provide notice to NYSDEC 10 business days prior to sampling initiation.

If you have any questions, please contact Jeff Stanek of ITT at 949-562-7401.

Yours sincerely



Bradley Kubiak, PE
PROJECT OFFICER

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Attachments: Figure 1 – Site Location
Figure 2 – Inorganics Sediment Sample Results and Proposed Additional Sample Locations

References

New York State Department of Environmental Conservation. 2014. Screening and Assessment of Contaminated Sediment. June 24, 2014.

O'Brien & Gere. 2013. Remedial Investigation Work Plan, Goulds Pumps Administration Inc., Seneca Falls, New York, Site No. C850012. January 2013.

O'Brien & Gere. 2015. Remedial Investigation Report, Goulds Pumps Facility Site, Site No. C850012. May 19, 2015.

Ramboll. 2022. Sediment Sampling Work Plan, Goulds Pumps Facility Site (C850013). September 21, 2022.

Ramboll. 2024. Sediment Sampling Letter Report, Goulds Pumps Facility Site (C850013). February 28, 2024.

United States Environmental Protection Agency. 1990. Declaration for the Record of Decision. General Motors-Central Foundry Division Site, Massena, St Lawrence County, NY. December 17, 1990.

United States Environmental Protection Agency and New York State Department of Environmental Conservation. 2015. Record of Decision. Operable Unit 2 of the General Motors – Inland Fisher Guide, Subsite of the Onondaga Lake Superfund Site, Town of Salina, Onondaga County, New York. March 31, 2015.

FIGURES



SITE LOCATION

FIGURE 01



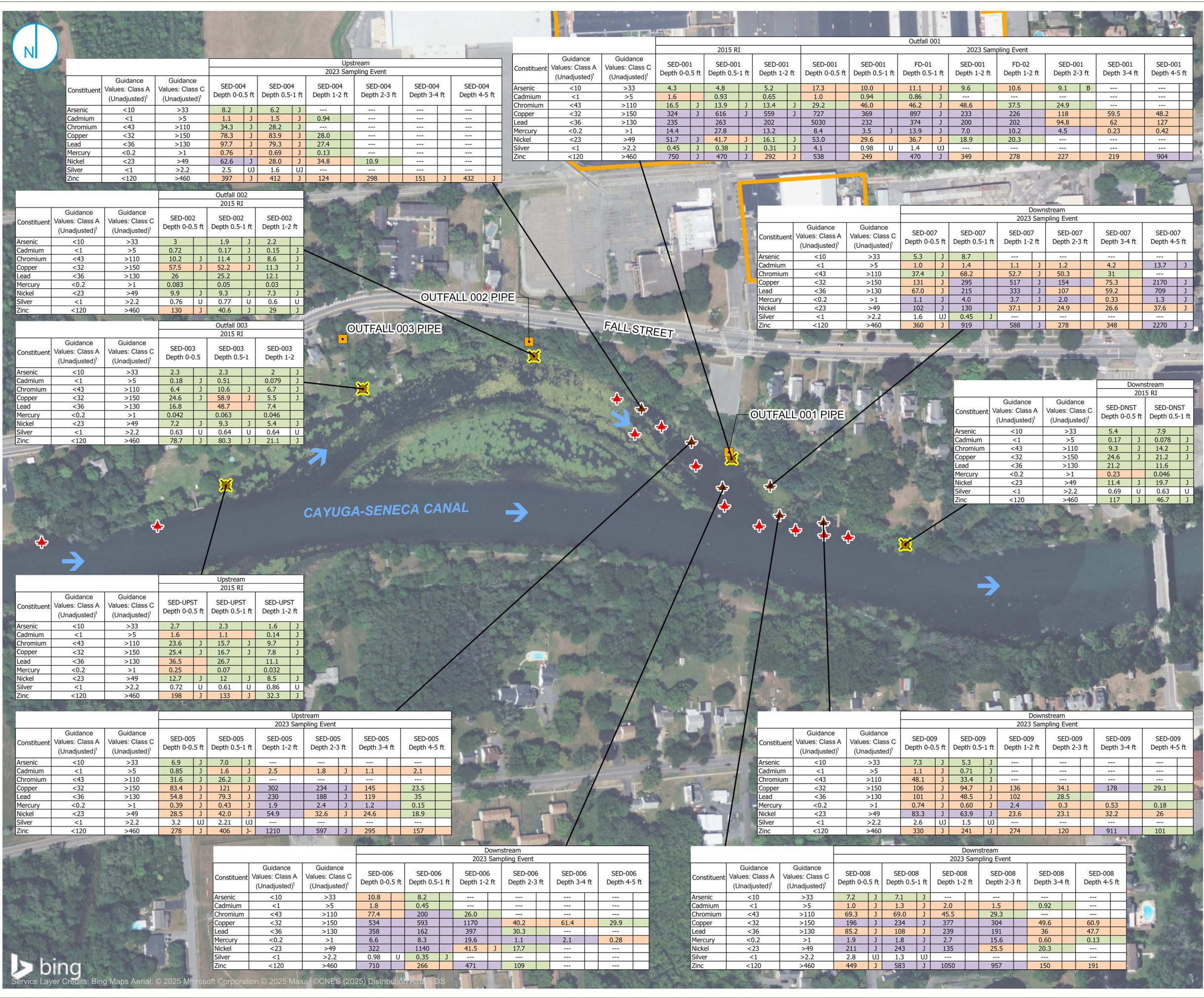
KEY MAP (not to scale)

0 1,000 2,000 Feet

Goulds Pumps Facility
240 Fall Street
Seneca Falls, New York
Site #C850013

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- ★ Proposed Additional Sediment Sample Location
- ★ August 2023 Sediment Sample Location
- ★ April 2014 Sediment Sample Location
- Outfall
- Class A Sediment
- Class B Sediment
- Class C Sediment
- Goulds Pumps Facility Site Boundary
- River Flow Direction

Notes

- Units are in milligram per kilogram (mg/kg).
- --- = Analysis not performed
- ¹ New York State Department of Environmental Conservation, Screening and Assessment of Contaminated Sediment, Table 5. Freshwater Sediment Guidance Values, June 24, 2014.
- RI - Remedial Investigation
- J - Estimated value
- U - Not detected at the detection limit shown.
- B - Compound was found in blank and sample.
- J- - Estimated value and may be biased low.
- 2015 RI locations sampled on April 23, 2014 (SED-001, SED-002, SED-DNST) and April 24, 2014 (SED-003, SED-UPST).
- 2023 Sampling Event locations sampled on August 14, 2023.

0 125 250
Feet

INORGANICS SEDIMENT SAMPLE RESULTS AND PROPOSED ADDITIONAL SAMPLE LOCATIONS

Goulds Pumps Facility
240 Fall Street
Seneca Falls, New York
Site #C850013

FIGURE 02

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