



HALEY & ALDRICH OF NEW YORK
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27 September 2022
File No. 0127981-026

New York State Department of Environmental Conservation
Region 8 Division of Remediation
6274 East Avon-Lima Road
Avon, New York 14414

Attention: Mr. Timothy A. Schneider, P.E.

Subject: Approval "as-modified"
Interim Remedial Measure Work Plan
IRM-7 Buried Received Tube Waste
Philips Lighting Company Bath Facility
7256 State Route 54
Bath, New York
BCP Site #C851044

Dear Mr. Schneider:

Yort, Inc. and Haley & Aldrich of New York (Haley & Aldrich) have received the New York State Department of Environmental Conservation (NYSDEC) letter dated 25 August 2022, conditionally approving the Interim Remedial Measure (IRM) Work Plan for the IRM-7 Buried Receiver Tube Waste at the Philips Lighting Company Bath Facility, dated 25 October 2018 and last revised 11 May 2022. The IRM-7 Work Plan revision dated 11 May 2022 was "approved as modified" by the NYSDEC per the following five (5) modifications specified in the letter:

1. **Sect 3.2 General:** Community Air Monitoring will occur during all ground intrusive activities and not only "during the excavation and direct loading of the waste material".
2. **Sect 3.3 Site Preparation:** All trucks and/or roll-offs containing waste material will be covered, inspected, and cleaned if necessary to ensure waste material does not exit the site onto surrounding roadways or unremarkable areas of the Site.
3. **Sect 4.1 Post-Removal Sampling:** Emerging contaminants and 1,4 Dioxane are added to the 25% full suite analyses.
4. **Appendix K - Community Air Monitoring Plan:** Compliance with Appendix 1B Fugitive Dust and Particulate Monitoring will be completed when utilizing the NYSDOH Generic CAMP (located in Appendix 1A of DER-10 / Technical Guidance for Site Investigation and Remediation).
5. **Appendix K - Community Air Monitoring Plan:** All readings will be provided on a weekly basis with all exceedances reported to NYSDEC and NYSDOH the same day or next business day if after hours along with the reason for exceedance, what was done to correct it, and if it was effective.

As representatives of the current site owner Yort, Inc. and the former site owner Philips North America LLC, formerly Philips Electronics North America Corporation (herein, collectively referred to as the Participants), Signify North America Corporation (Signify) and their technical team (Haley & Aldrich) have reviewed NYSDEC's proposed modifications to the IRM-7 Work Plan and accept the NYSDEC's approval "as modified."

Schedule

NYSDEC has requested a calendar schedule for the IRM-7 activities. The project implementation schedule included as Figure 4 in the IRM-7 Work Plan (attached) describes the anticipated sequence and duration of IRM activities, but not specific start/completion dates. The actual start of the work is contingent upon a number of factors including demolition sequencing and other complementary remedial measures. Once the schedule for implementation of IRM-7 has been determined, an updated schedule/sequencing will be provided, and the NYSDEC will be notified at least 7-days prior to commencement of field activities.

Sincerely yours,

HALEY & ALDRICH OF NEW YORK



Steve Phillips
Senior Client Leader



W. Thomas West, P.G. (NY)
Senior Associate

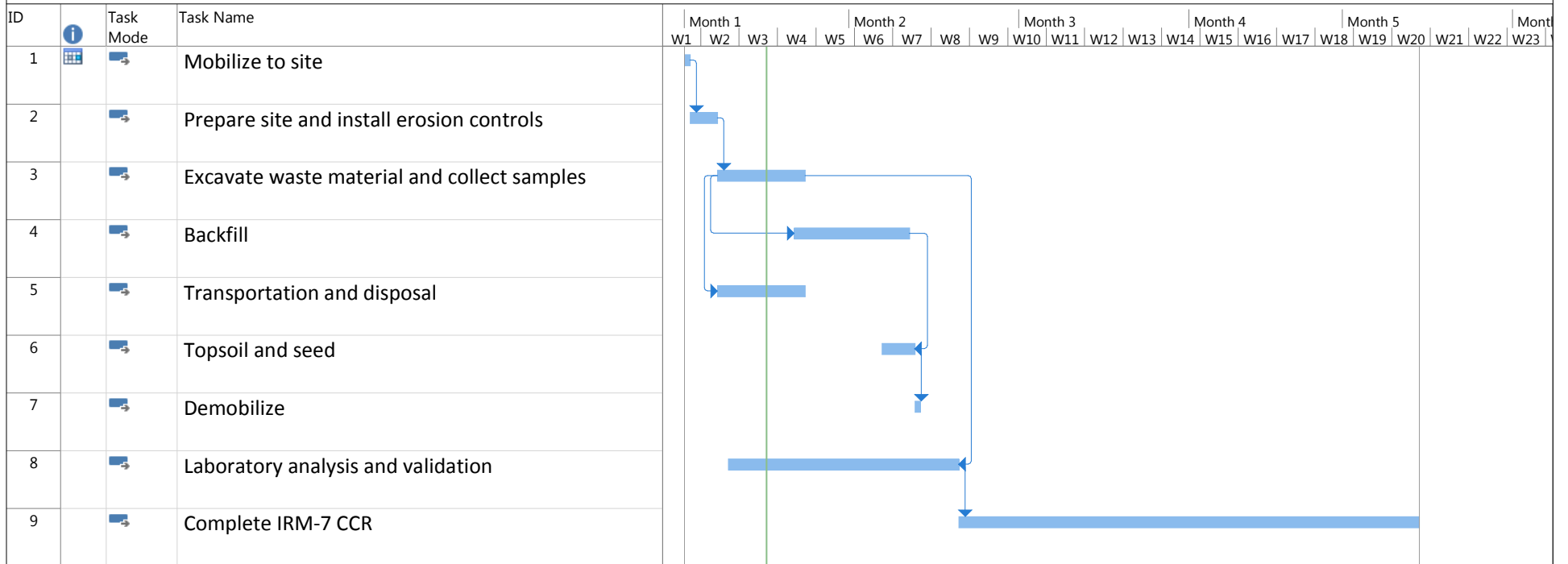
Attachment:

Figure 4 – IRM-7 Implementation Schedule

c: Signify; Attn: E. Filc, M. Manning

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**FIGURE 4
IRM-7 IMPLEMENTATION SCHEDULE**



Project: 2018-1105 IRM7 Sched Date: Fri 11/16/18	Task		Inactive Task		Manual Summary Rollup		External Milestone	
	Split		Inactive Milestone		Manual Summary		Deadline	
	Milestone		Inactive Summary		Start-only		Progress	
	Summary		Manual Task		Finish-only		Manual Progress	
	Project Summary		Duration-only		External Tasks			