HALEY ALDRICH

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REPORT ON

ADDENDUM TO IRM-8 WORK PLAN
UPDATED IRM-8 COVER SYSTEM CONSTRUCTION
PHILIPS LIGHTING COMPANY BATH FACILITY
BATH, NEW YORK

by Haley & Aldrich of New York
Rochester, New York

for New York State Department of Environmental Conservation
Avon, New York

File No. 127981-030
Revised December 2023

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1 December 2023
File No. 127981-031

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

Attention: Joshuah J. Klier, G.I.T., M.S.

Subject: Addendum to IRM-8 Work Plan
Updated IRM-8 Cover System Construction
Philips Lighting Company Bath Facility
7265 State Route 54
Bath, New York
BCP Site #C851044

Dear Mr. Klier:

On behalf of Philips North America, LLC and Yort, Inc. (Philips/Yort), Haley & Aldrich of New York (Haley & Aldrich) has prepared this addendum work plan in response to the New York State Department of Environmental Conservation (NYSDEC) conditionally approved Interim Remedial Measure (IRM) IRM-8 Work Plan for the Former Philips Lighting Company facility located in Bath, New York (Site). The work plan summarized the scope of work for collecting pre-characterization samples of the sub-base material that is present beneath paved areas of the site; the sub-base material is proposed to be reused on site as fill material beneath the demarcation layer and clean soil cover in the IRM-8 work area.

Background

The IRM-8 Work Plan, dated 3 October 2023, addresses the removal of isolated surficial and shallow subsurface soils containing trichloroethene (TCE) at concentrations above New York State Department of Environmental Conservation (NYSDEC) Protection of Groundwater (PoG) Soil Cleanup Objectives (SCOs) in six areas of concern (AOCs) at the Site; removal of existing impervious cover systems within the IRM-8 area, including asphalt roadways, concrete aprons, and several remaining building slabs (including the Powerhouse, Building 1 outbuildings, the former garage and former 90-day storage building slabs); and excavation and removal of several subgrade structures. Following the building slab and cover system removals, the area will be backfilled with fill material to raise existing grade surfaces, and a demarcation layer and at least 1 foot of clean soil will be placed over the approximately 144,000-square-foot area (IRM-8 area).

As part of ongoing Site demolition activities, the asphalt-paved parking lots and roadways surrounding the building will be milled and the asphalt material removed. Approximately 7,300 cubic yards (cy) of gravel sub-base material is anticipated to generated from the removal of the asphalt-covered areas, and the sub-base material is planned to be reused to raise the surface elevation of the footprint of the IRM-8 area to match the surrounding existing grades. The sub-base material that will be used as backfill beneath the new cover system will be consolidated, direct-loaded, and transported and placed on the sub-base material that had previously underlain the asphalt surfaces in the IRM-8 area where the new cover system will be constructed. The sub-base gravel backfill material will be placed within the central and southern portion of the new cover system on top of the existing asphalt roadway sub-base material to increase the grade elevation to a minimum of 1,131 feet (National Geodetic Vertical Datum [NGVD]). Once the sub-base gravel material has been consolidated in the IRM-8 area, it will be graded to distribute the backfill in lifts of between 6 inches and 1 foot to provide a uniform surface for construction of the new cover system consistent with the conditionally approved IRM-8 Work Plan.

PROPOSED SUB-BASE SAMPLING

The area where the 7,300 cy of sub-base material will be removed includes asphalt-covered areas in the employee and office parking lots and asphalt-covered roadways along the west side of Buildings 2, 3/4, 5, and the south and west sides of the former Chemical Intermediates Building. Figure 1 shows the asphalt areas that are planned to be milled and removed as part of the ongoing demolition activities.

With the expectation that the sub-base material is uniform, non-impacted, and derived from the same general source, we are proposing to collect pre-qualification samples of the sub-base material to verify that the material is suitable for re-use as fill beneath the IRM-8 demarcation and clean soil cover system. Consistent with NYSDEC comments on the conditionally-approved IRM-8 Work Plan, we are proposing to collect discrete and composite samples from areas beneath the asphalt to characterize the sub-base material for reuse as fill at the site. The Department suggested that a smaller subset of representative samples could be sufficient to allow the material to be direct loaded and transferred to the IRM-8 work area if the material was generally uniform and did not show visual signs of impairment. Based on the Department's suggestion, we are proposing to collect 12 discrete samples for Part 375 volatile organic compounds (VOCs) analysis via EPA Method 8260B and four composite samples for the analyses of Part 375 Metals via Method 6010/7471A, Part 375 semi-volatile organic compounds (SVOCS) via EPA Method 8270, polychlorinated biphenyls (PCBs) via EPA Method 8082, Part 375 Pesticides via EPA Method 8081, and perfluorooctane sulfonic acid (PFOS) and per- and polyfluoroalkyl substances (PFAS) via EPA Method 1633.

The proposed sampling frequency is contingent on the sub-base material being homogeneous, uniform, and generally comprising the same materials. However, if the composition of the sub-base material is found to be variable or comprised of a mixture of aggregate and soils, or if there is evidence of releases or impacts to the soil, then the NYSDEC will be notified and additional samples of the sub-base material would be collected based on the sampling rational of DER-10 Table 5.4(e)10 if there are varying quantities of material with different composition (e.g. sub-base and soils). In the event of observations of a release or impacts to soils beneath the paved surfaces, then NYSDEC would also be notified, and the sampling approach for characterizing these conditions would be in accordance with the Interim Site Management Plan (ISMP), including Section B-3 Soil Screening.

Samples of the sub-base material will be collected from test pits using a small hydraulic excavator and the test pits are expected to be extended to approximately 1 to 2 feet deep, depending on the thickness of the asphalt and sub-base materials beneath the paved surfaces. The test pit and sampling locations will be spatially distributed within the asphalt-covered areas. The proposed sampling locations are shown in Figure 1 and the sampling analysis plan is included as Table 1.

The excavated material would be placed on plastic sheeting immediately next to the test pit and the samples would be collected directly from the excavated material. For the collection of the composite samples, sub-base material collected from between three and five excavations (as shown on Figure 1) would be collected from the excavated material at each test pit and then combined in a dedicated stainless-steel mixing container, blended to develop a homogenous sample, then the composite sample would be transferred to the appropriate sampling containers.

Excess soil generated during the shallow testing pitting would be returned to the excavation, since the asphalt material is scheduled to be milled and removed from the Site as part of the planned cover system removal and the sub-base material, if demonstrated to meet reuse requirements, would be used as fill in the IRM-8 area.

The test pit excavation activities and sampling will be performed in compliance with the NYSDEC-approved ISMP, the Excavation Work Plan (EWP) in Appendix B of the ISMP, and associated Community Air Monitoring Plan (CAMP) provided in Appendix B-15 of the ISMP.

Project Schedule

The test pitting and sampling of the sub-base material is anticipated to require two to three days to complete and would be initiated upon approval of the addendum work plan by the NYSDEC. The results of the sub-base sampling would be evaluated and tabulated, then provided to the NYSDEC along with a the NYSDEC Request for Import/Reuse Fill or Soil form, a copy of which is attached. Philips/Yort will provide a minimum of seven days' advance notice to the NYSDEC prior to field activities associated with the test pit excavations and sub-base material sampling activities.

Should you have any questions regarding this work plan or wish to discuss the project further, please do not hesitate to contact either Emil Filc of Signify or the undersigned at Haley & Aldrich.

Sincerely yours,
HALEY & ALDRICH OF NEW YORK

Mark Ramsdell, P.E. (NY)
Sr. Project Manager

W. Thomas West, P.G. (NY)
Principal Consultant

Enclosures:
Table 1 – Sampling Analysis Plan - Sub-Base Material Sampling for IRM-8

Figure 1 – Proposed Sub-base Sampling Locations
Attachment – NYSDEC Request to Import/Reuse Fill or Soil form (April 2023)

c: Signify; Attn: M. Manning and E. Filc
NYSDEC; Attn: D. Loew and D. Pratt
NYSDOH; Attn: J. Robinson and J. Deming

\\haleyaldrich.com\share\roc_common\Projects\34201\214 - IRM WPs\FINAL DRAFTs\IRM-8 DRAFT Work Plan_Soil Consolidation\Addendum - Subbase Sampling\2023_1201_HANY-IRM-8 WP Addendum-F.docx

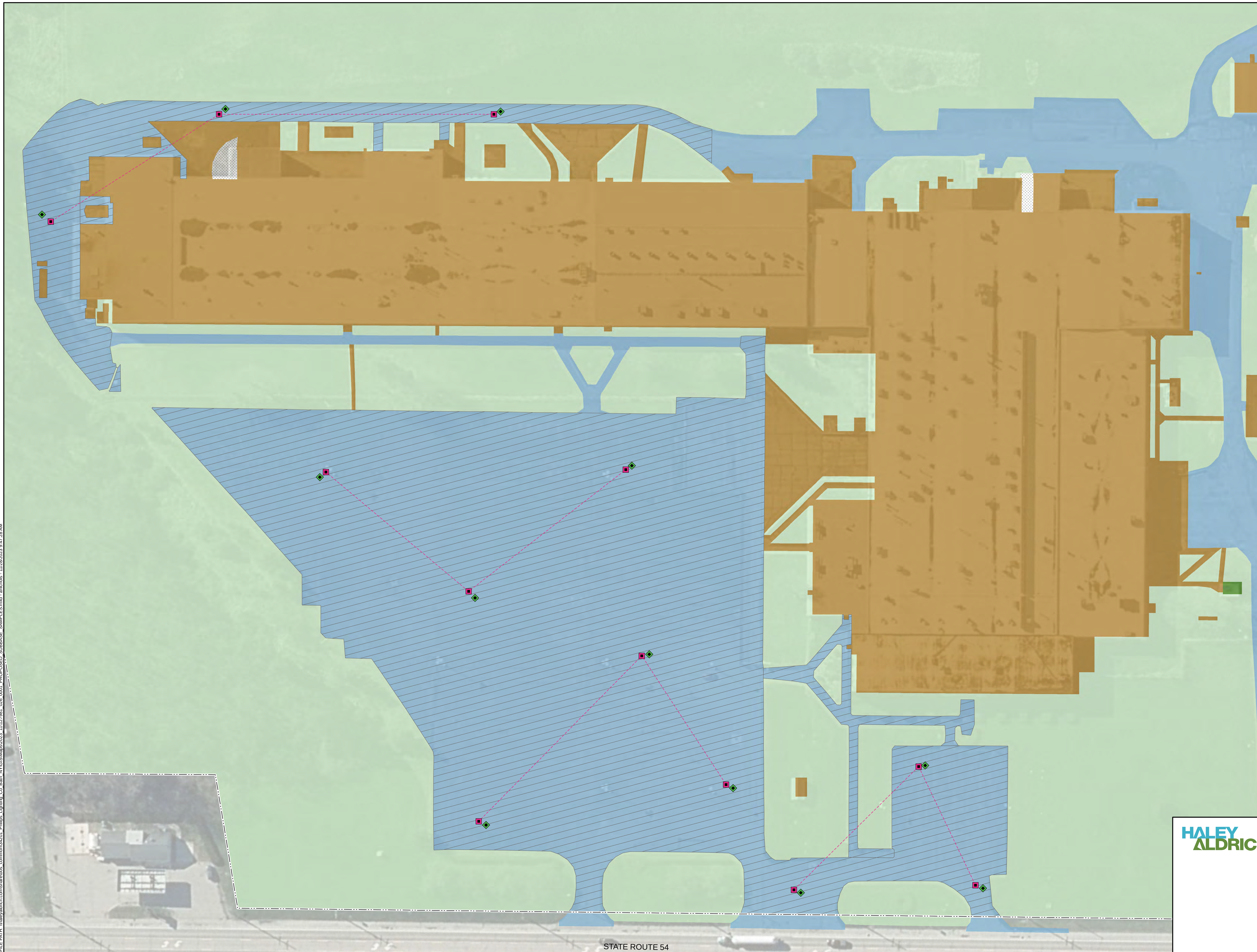
TABLE

TABLE 1
SAMPLING ANALYSIS PLAN - SUB-BASE MATERIAL SAMPLING FOR IRM-8
PHILIPS LIGHTNING COMPANY BATH FACILITY
BATH, NEW YORK
BCP SITE #851044

Description		Sample Matrix	Sample Description	Location ID		Collection Method	Sample Depth (Feet b.g.s)	Minimum No. Samples	Sample Type	Analytical Method
Sub-base Material Sampling for IRM-8 Asphalt areas in the parking lots	Characterization of sub-base material beneath asphalt areas. Sub-base material will be excavated and used to raise the grade of IRM-8 area.	Soil	Soil to be imported as fill for IRM-8 Area	9 VOC locations 3 composited locations, each comprising of 3 discrete sample locations	For VOCs: SUB-01 to SUB-09 For Composites: SUB-COMP01 to SUB-COMP03	Excavator	Below asphalt, approximately 1.0-1.3 ft bgs in sub-base material	9 VOC samples 3 composite samples	VOCs: Grab Other analyses: Composite	VOC locations: Part 375 VOCs via EPA 8260B Composited locations: Part 375 Metals via EPA Methods 6010/7471A, Part 375 SVOCs via EPA Method 8270, and PCBs via EPA Method 8082, Part 375 Pesticides via EPA Method 8081 and PFOA/PFOS via EPA Method 1633.
Sub-base Material Sampling for IRM-8 Paved roadways west and south of former Buildings 2/4/5 and the CIB				3 VOC locations 1 composited location, comprising of 3 discrete sample locations	For VOCs: SUB-10 to SUB-12 For Composites: SUB-COMP04			3 VOC samples 1 composite sample		VOC locations: Part 375 VOCs via EPA 8260B Composited locations: Part 375 Metals via EPA Methods 6010/7471A, Part 375 SVOCs via EPA Method 8270, and PCBs via EPA Method 8082, Part 375 Pesticides via EPA Method 8081 and PFOA/PFOS via EPA Method 1633.

Notes and Abbreviations:
AOC: Area of Concern
EPA: Environmental Protection Agency
PCBs: Polychlorinated Biphenyls
SVOCs: Semi-volatile Organic Compounds
VOCs: Volatile Organic Compounds

FIGURE



LEGEND

PROPOSED ASPHALT MILLING AREA

PROPOSED SUBBASE SAMPLE

- DISCRETE SAMPLE, TO BE ANALYZED FOR VOCs
- COMPOSITE SAMPLE, TO BE ANALYZED FOR SVOCs, INORGANICS, PCBs, PESTICIDES
- LINE CONNECTING SAMPLES TO BE COMPOSITED FOR NON-VOC ANALYSES

EXISTING COVER TYPE

- BUILDING WITH CONCRETE FLOOR
- ASPHALT
- CONCRETE/BUILDING SLABS
- GRASS/VEGETATIVE COVER
- STONE
- BCP SITE BOUNDARY

NOTES

1. ALL LOCATIONS AND DIMENSIONS ARE APPROXIMATE.
2. COVER TYPE DATA SOURCE: PLAN TITLED, "TOPOGRAPHIC SURVEY," PREPARED BY HOFFMAN LAND SURVEYING AND GEOMATICS, DATED 28 OCTOBER 2020, AND INTERPRETATION OF AERIAL PHOTOGRAPHS
3. AERIAL IMAGERY SOURCE: NYSGIS, 2020

0 50 100 150 200

SCALE IN FEET

HALEY ALDRICH

PHILIPS LIGHTING COMPANY
BATH FACILITY
7265 STATE ROUTE 54
BATH, NEW YORK

PROPOSED SUBBASE SAMPLING LOCATIONS

NOVEMBER 2023

FIGURE 1

NYSDEC Request to Import/Reuse Fill or Soil Form (April 2023)

NEW YORK STATE
DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Request to Import/Reuse Fill or Soil

This form is based on the information required by DER-10, Section 5.4(e) and 6NYCRR Part 360.13. Use of this form is not a substitute for reading the applicable regulations and Technical Guidance document.

SECTION 1 – SITE BACKGROUND

The allowable site use is: Choose an item

Have Ecological Resources been identified? Choose an item

Is this soil originating from the site? Choose an item

How many cubic yards of soil will be imported/reused? Choose an item

If greater than 1000 cubic yards will be imported, enter volume to be imported:

SECTION 2 – MATERIAL OTHER THAN SOIL

Is the material to be imported gravel, rock or stone? Choose an item

Does it contain less than 10%, by weight, material that passes a size 100 sieve? Choose an item

Is this virgin material from a permitted mine or quarry? Choose an item

Is this material recycled concrete or brick from a DEC registered processing facility? Choose an item

SECTION 3 - SAMPLING

Provide a brief description of the number and type of samples collected in the space below:

Example Text: 5 discrete samples were collected and analyzed for VOCs. 2 composite samples were collected and analyzed for SVOCs, Inorganics & PCBs/Pesticides.

If the material meets requirements of DER-10 section 5.4(e)5 (other material), no chemical testing needed.

SECTION 3 CONT'D - SAMPLING

Provide a brief written summary of the sampling results or attach evaluation tables (compare to DER-10, Appendix 5):

Example Text: Arsenic was detected up to 17 ppm in 1 (of 5) samples; the allowable level is 16 ppm.

If Ecological Resources have been identified use the "If Ecological Resources are Present" column in Appendix 5.

SECTION 4 – SOURCE OF FILL

Name of person providing fill and relationship to the source:

Location where fill was obtained:

Identification of any state or local approvals as a fill source:

If no approvals are available, provide a brief history of the use of the property that is the fill source:

Provide a list of supporting documentation included with this request:

The information provided on this form is accurate and complete.

_____ _____

Signature Date

_____

Print Name

_____

Firm

Revised April 2023