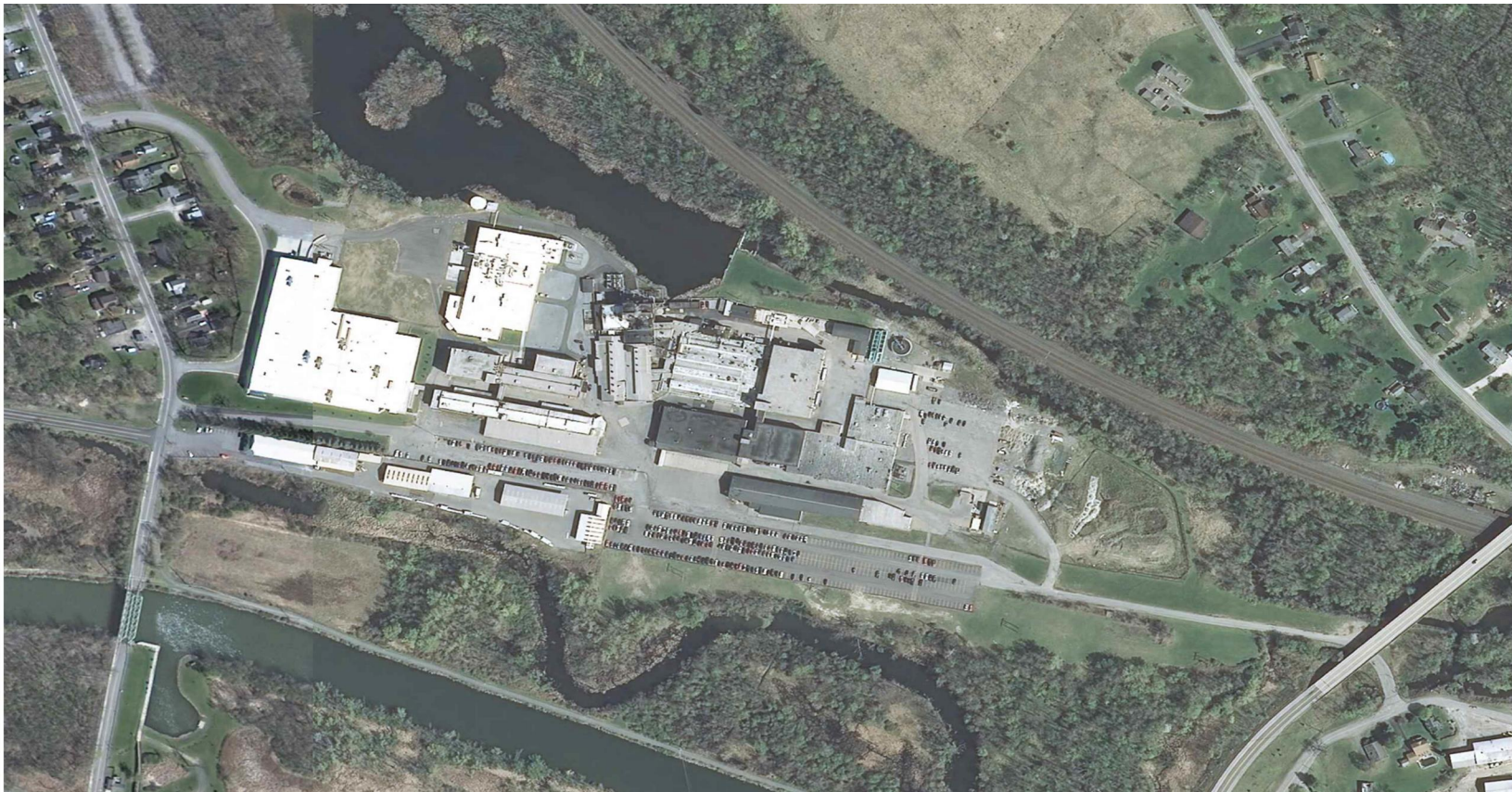
Periodic Review Report

Klozures BCP Site (BCP Site #C859001)
Reporting Period: April 21, 2020 to April 21, 2021

Garlock Sealing Technologies, LLC

July 16, 2021

→ The Power of Commitment



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Project manager	Damian Vanetti
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Document status

Status Code	Revision	Author	Reviewer		Approved for issue		
			Name	Signature	Name	Signature	Date

Contents

Figure Index

Appendices

1. Introduction

1.1 Purpose of this Report

This Periodic Review Report (PRR) is being submitted on behalf of Garlock Sealing Technologies, LLC (Garlock) for the Klozures Brownfield Cleanup Program (BCP) Site (BCP Site #C859001) located at 1666 Division Street, Town of Palmyra, Wayne County, New York (Figure 1). The purpose of this PRR and attached documents is to document that the institutional controls (ICs) and soil management practices, as described in the New York State Department of Environmental Conservation (NYSDEC)-approved Site Management Plan (SMP, May 2015) and the Environmental Easement (filed December 19, 2006), are in place in accordance with 6NYCRR Part 375-3. The following elements are included in this report:

– A complete description of all institutional controls and soil management procedures employed at the Site.
– An evaluation of the plans developed for implementation of the institutional controls and soil management procedures, regarding the continued effectiveness of any institutional controls and soil management procedures required by the decision document for the Site.
– The Institutional and Engineering Controls Certification Form as issued by the Department, which has been completed and included as Appendix A.

1.2 Scope and Limitations

This report: has been prepared by GHD for Garlock Sealing Technologies, LLC and may only be used and relied on by Garlock Sealing Technologies, LLC for the purpose agreed between GHD and Garlock Sealing Technologies, LLC as set out in this report.

GHD otherwise disclaims responsibility to any person other than Garlock Sealing Technologies, LLC arising in connection with this report. GHD also excludes implied warranties and conditions, to the extent legally permissible.

The services undertaken by GHD in connection with preparing this report were limited to those specifically detailed in the report and are subject to the scope limitations set out in the report.

The opinions, conclusions and any recommendations in this report are based on conditions encountered and information reviewed at the date of preparation of the report. GHD has no responsibility or obligation to update this report to account for events or changes occurring subsequent to the date that the report was prepared.

The opinions, conclusions and any recommendations in this report are based on assumptions made by GHD described in this report. GHD disclaims liability arising from any of the assumptions being incorrect.

GHD has prepared this report on the basis of information provided by Garlock Sealing Technologies, LLC and others who provided information to GHD (including Government authorities), which GHD has not independently verified or checked beyond the agreed scope of work. GHD does not accept liability in connection with such unverified information, including errors and omissions in the report which were caused by errors or omissions in that information.

The opinions, conclusions and any recommendations in this report are based on information obtained from, and testing undertaken at or in connection with, specific sample points. Site conditions at other parts of the site may be different from the site conditions found at the specific sample points.

Investigations undertaken in respect of this report are constrained by the particular site conditions, such as the location of buildings, services, and vegetation. As a result, not all relevant site features and conditions may have been identified in this report.

Site conditions (including the presence of hazardous substances and/or site contamination) may change after the date of this Report. GHD does not accept responsibility arising from, or in connection with, any change to the site conditions. GHD is also not responsible for updating this report if the site conditions change.

1.3 Certification Period

As of the date of this report, Garlock has not received the NYSDEC Institutional and Engineering Controls Certification Form for the current reporting period. As a result, the most recent Form (NYSDEC, March 12, 2015) for this Site was used, and the Certification Period dates were modified accordingly.

This PRR discusses maintenance and monitoring activities for the period between April 21, 2020 and April 21, 2021. During this period, Garlock personnel monitored activities conducted on the Klozures Site and maintained records for inclusion in this PRR as appropriate. As part of preparing this PRR submittal, GHD Consulting Services Inc. (GHD) personnel performed an annual Site inspection of the Klozures Site on April 19, 2021 (Appendix B).

2. Site Overview

2.1 Background

The Site is located in the Town of Palmyra, Wayne County, New York and is identified as Tax ID Number 64111-00-839937 on the Wayne County Tax Map (Tax Map No. 64111-00). The Site is approximately 7.0 acres of land on the western portion of the approximately 45 acres Garlock has developed for their manufacturing complex and is bounded by Red Creek and a portion of the Site No. 3 BCP Site to the north, portions of the Site No. 3 and Gylon BCP Sites to the east, a commercial lumber yard to the south, and Division Street and adjacent residences to the west (see Figure 2). The entire tax parcel that contains the Site is owned by Garlock and totals approximately 142 acres.

The Site is currently developed with a single-story, approximately 116,000 square foot building used for office space, manufacturing, distribution, and warehouse operations. The portion of the Site not occupied by the building consists of paved parking, shipping and receiving, and driving areas, maintained landscape, and stormwater management areas.

The Remedial Investigation (RI), which was conducted under the Brownfield Cleanup Agreement (BCA) Index #B8-0690-05-04 between December 2005 and October 2006, characterized the nature and extent of contamination at the Site. The results of the RI, as reported in the RI Report (S&W Redevelopment of North America, LLC [SWRNA], November 2006, Revised: December 2006) determined that relatively minor impacts to soil, groundwater, and soil vapor were observed and that no complete human or ecological exposure pathways existed at the Site. As a result, no remedial action was deemed necessary for the Site, but institutional controls (ICs) and engineering controls (ECs) were established. The ICs and ECs included recording of an Environmental Easement which restricts the use of groundwater and limits the future use of the Site to industrial uses and required monitoring of the building's existing ventilation system to ensure that a minimum positive pressure of 0.002 inches of water column was maintained within the building. Based on a soil vapor intrusion evaluation completed within and surrounding the Klozures Building in early 2015, and documented in the *Klozures BCP Site Soil Vapor Intrusion Evaluation, BCP Site #C859001* report (GHD, May 2015), it was established that vapor intrusion mitigation was not required in accordance with the New York State Department of Health (NYSDOH) *Guidance for Evaluating Soil Vapor Intrusion in the State of New York* (October 2006). The NYSDEC and NYSDOH approved the discontinuation of the requirement to monitor the building's pressurization system, and also approved the *Klozures BCP Site Soil Vapor Intrusion Evaluation* report (GHD, May 2015) and the *Revised Site Management Plan* for the Site (GHD, May 2015) (NYSDEC e-mail dated June 16, 2015). As a result, monitoring of the building's pressurization is no longer an element of the *Revised Site Management Plan* (GHD, May 2015) and the Site no longer has ECs in place.

The Environmental Easement (EE) for the Site was filed with the Wayne County Clerk's Office on December 19, 2006. A Site Management Plan, which outlines Site restrictions and requirements of future maintenance and monitoring, was submitted to, and subsequently approved by the NYSDEC in 2008. A Certificate of Completion (COC) allowing for industrial uses of the Site was received from the NYSDEC on December 26, 2006. The NYSDEC-approved SMP was subsequently revised twice, once in February 2009 and once in May 2015, and each revision was subsequently approved by the NYSDEC.

2.2 Additional Resources

The reader of this PRR may refer to previous reports for more detail, as needed. These reports include:

- *Remedial Investigation Report*, Garlock Sealing Technologies, Klozures Brownfield Site, 1666 Division Street, Village of Palmyra, Wayne County, New York, BCP Site #C859001, S&W Redevelopment of North America, LLC, November 2006, Revised December 2006.
- *Soil Vapor Intrusion Evaluation,* S&W Redevelopment of North America, LLC, November 2007.
- *Site Management Plan,* S&W Redevelopment of North America, LLC, May 2008, Revised: February 2009.
- *Periodic Review Report, Klozures BCP Site (BCP Site #C859001), September 19, 2011 to April 21, 2014,* GHD Consulting Services Inc., August 2014.
- *Soil Vapor Intrusion Evaluation Letter Work Plan, Garlock Sealing Technologies – Klozures BCP Site, Palmyra, New York, NYSDEC BCP Site #C859001,* GHD Consulting Services Inc., January 29, 2015.
- *Klozures BCP Site Soil Vapor Intrusion Evaluation,* GHD Consulting Services Inc., May 2015.
- *Revised Site Management Plan*, Brownfield Cleanup Program, Garlock Sealing Technologies, Klozures Brownfield Site, Palmyra, Wayne County, New York, BCP Site #C859001, GHD Consulting Services Inc., Revised: May 2015.
- *Klozures Revised SMP and SVI Report E-Mail,* New York State Department of Environmental Conservation, June 16, 2015.
- *Klozures BCP Site (BCP Site #C859001), Periodic Review Report – April 21, 2014 to April 21, 2015,* GHD Consulting Services Inc., June 16, 2015.
- *Klozures BCP Site (BCP Site #C859001), Periodic Review Report – April 21, 2015 to April 21, 2016,* GHD Consulting Services Inc., June 1, 2016.
- *Klozures BCP Site (BCP Site #C859001), Periodic Review Report – April 21, 2016 to April 21, 2017,* GHD Consulting Services Inc., May 31, 2017.
- *Klozures BCP Site (BCP Site #C859001), Periodic Review Report – April 21, 2017 to April 21, 2018,* GHD Consulting Services Inc., June 15, 2018.
- *Klozures BCP Site (BCP Site #C859001), Periodic Review Report – April 21, 2018 to April 21, 2019,* GHD Consulting Services Inc., June 13, 2019.
- *Klozures BCP Site (BCP Site #C859001), Periodic Review Report – April 21, 2019 to April 21, 2020,* GHD Consulting Services Inc., June 29, 2020.

3. Institutional and Engineering Controls

Based on minor identified groundwater, soil, and soil vapor contamination and the Site's past and present use, institutional controls are utilized at the Site to limit potential exposure risks. These controls are described below.

3.1 Institutional Controls

The institutional controls for this Site are outlined in the NYSDEC-approved SMP (SWRNA, May 2008, Revised: February 2009 and May 2015), and include the following:

- An Environmental Easement filed with the Wayne County Clerk's Office
- A restriction on the use of groundwater without prior approval by the NYSDEC and the NYSDOH
- Soil management procedures providing guidance for future excavations conducted on-Site
- A use restriction limiting future Site use to industrial use without prior approval of the NYSDEC

3.1.1 Environmental Easement

The Environmental Easement was filed at the Wayne County Clerk's Office on December 19, 2006 and a review of the County's online database (http://web.co.wayne.ny.us/county-clerk/county-clerk-indexes/) on May 10, 2021 indicated that the Easement is recorded, but no electronic copy is available for review.

3.1.2 Groundwater

Groundwater is not being used at the Site since the Site is serviced by a municipal water supply system.

3.1.3 Soil Management

Although no soil cover engineering controls are required at the Site, the NYSDEC-approved SMP includes soil management procedures, which provide guidance for any intrusive activities taking place anywhere on the Site. The soil management procedures identify requirements to be implemented during any intrusive activities, including communication of potential hazards, implementation of a health and safety plan, implementation of a Community Air Monitoring Plan (CAMP), erosion control measures, soil reuse criteria, soil disposal criteria, imported soil criteria, and stockpiled soil management.

During this PRR's certification period, no ground intrusive activities that would have required implementation of the soil management procedures were performed on the Klozures BCP Site.

The previous PRR (GHD June 29, 2020) noted several items that were addressed or were on-going during this PRR Certification Period:

1. Areas of the Site's surface soil that were disturbed (tire rutting and scraped surface soil) from what appeared to be snow removal activities were regraded and seeded. The repair work was performed by Garlock personnel when possible, in conformance with COVID-19 protocols and other Site requirements. As such, no formal Work Order was issued for this task and a specific completion date is not available. Additional soil was not required and, as a result, no soil was delivered to the Klozures Site.
2. A stormwater catch basin at the southwest corner of the Klozures Building required the grate be cleared of soil and the basin cleaned of sediment. This work, which included manually clearing the grate and vacuuming out the catch basin, was performed by a subcontractor hired by Garlock as part of their on-going SPDES Best Management Plan activities.
3. In July 2020, GHD submitted a Joint Application Form to NYSDEC on behalf of Garlock to implement repairs to the Outfall 018 channel. Follow-up communications have occurred periodically with NYSDEC, the most recent of which was received April 9, 2021 and indicated that review of the application should be completed by May 9, 2021. As of the date of this report, the permit application is still under NYSDEC review and commencement of the repairs is awaiting the NYSDEC approval of the application.

Based on GHD's April 19, 2021 Site inspection, the following observations were noted:

1. The asphalt paving, concrete sidewalks, and concrete floor slabs that are part of the Site were in place and intact. The soil covered landscaped areas typically had established vegetation, with the exception of the apparent snow removal damage noted below.
2. There were areas of minor disturbance/rutting of the surface soils immediately adjacent to the paved driveways, likely due to snow removal activities. The repair of these rutted areas should include regrading remaining soils and/or importing topsoil from the "Pulcini soil piles" (see Appendix D), if deemed necessary, and reseeding to reestablish the vegetative cover. Repair activities should be documented for inclusion in the next PRR Certification Period. Garlock issued Work Order #M-106970 on May 3, 2021 to address the identified issues (Appendix B).
3. The Outfall 018 channel continues to exhibit erosion on the banks. The proposed repair of this area is waiting for NYSDEC review and approval to be completed, as discussed above.

3.1.4 Site Use

The Site is currently used by Garlock for their industrial purposes, which has not changed since the NYSDEC issued the Certificate of Completion.

3.2 Engineering Controls

There are no longer any engineering controls identified for the Site; however, soil management procedures are included in the NYSDEC-approved SMP and need to be followed during any ground intrusive activities completed at the Site. Information for activities completed on-Site during this PRR's certification period, under the soil management procedures, is summarized above and included in Appendix B.

4. Operations and Monitoring

Garlock submitted a revised SMP (GHD, May 2015) to the NYSDEC and NYSDOH for review and approval. The revised SMP removed requirements for monitoring the pressurization of the building as a means of mitigating SVI. Upon receipt of NYSDEC and NYSDOH approval of the revised SMP (NYSDEC E-Mail, June 16, 2015, Appendix C), the requirement for monitoring the pressurization of the building was no longer required as an engineering control. As a result, there are currently no operation and/or monitoring requirements for this Site.

5. Recommendations

It is recommended that the ICs currently in place for the Site remain in place in order to ensure the continued effectiveness and protectiveness of the remedy.

An annual inspection is conducted at the Site as part of the PRR requirements. The inspection for this PRR Certification Period was completed by GHD personnel on April 19, 2021. The annual inspection forms are included in Appendix B and the inspection identified the following recommendations for the Site:

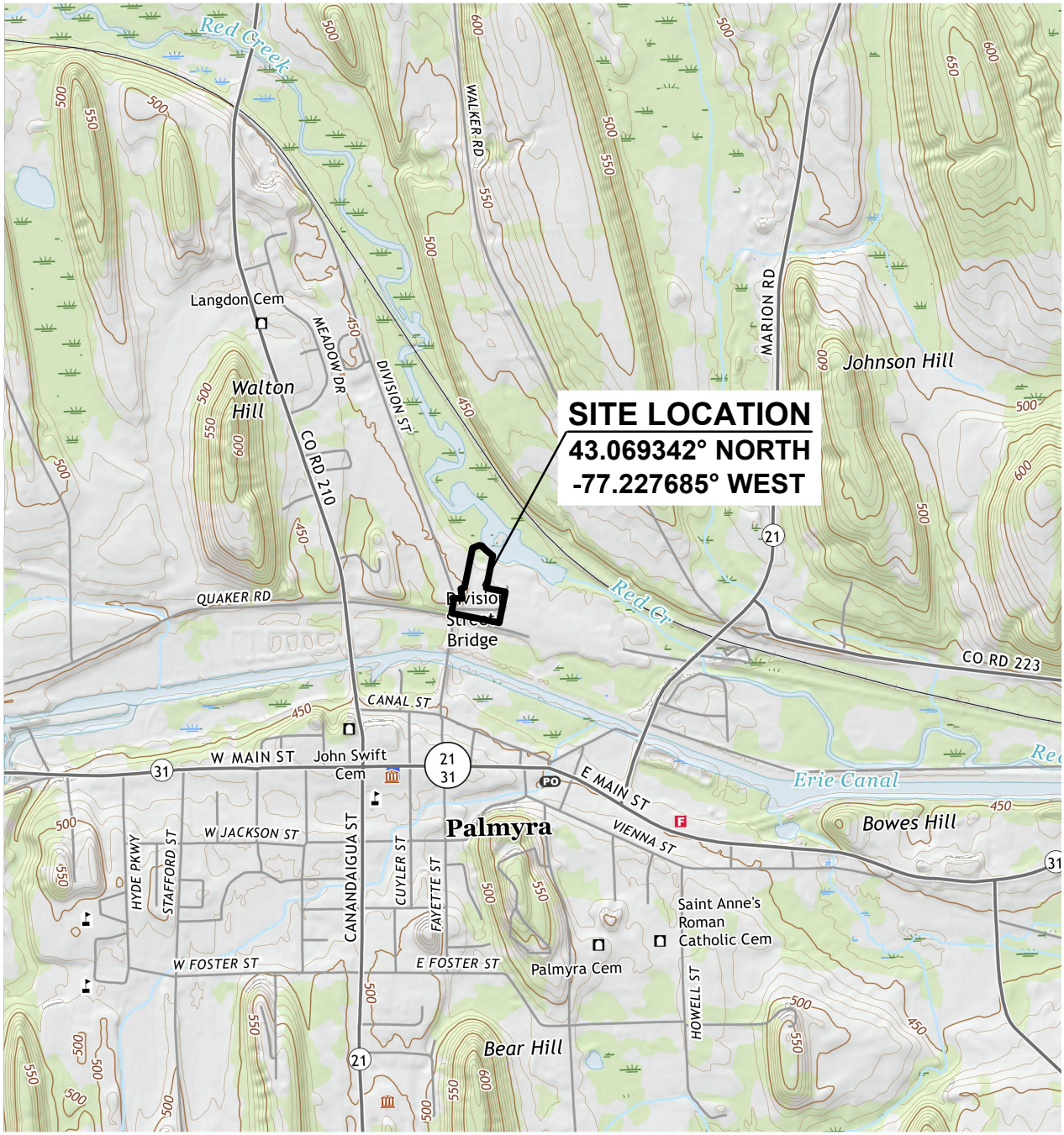
– Minor surface soil repairs are required for the disturbed soil surface adjacent to roadways. Repairs should include regrading and/or filling as needed and reseeding to reestablish grass cover. Documentation of the repair work should be completed and maintained for inclusion in the next PRR.
– SPDES Outfall 018: although there is no soil cover engineering control in place on the Klozures BCP Site, there is soil erosion noted in the vicinity of SPDES Outfall 018 that should be addressed by implementing best management practices to stabilize this area and mitigate the potential for future erosion. Garlock and GHD have developed a plan to address this area of the Site and submitted a permit application to the NYSDEC in July 2020, which is currently still under review. Repairs are proposed to consist of placing a stabilization fabric covered by topsoil to cover exposed soil and establishing a vegetative cover to effectively mitigate the potential of future transport of soil/sediment to Red Creek. The most recent response from NYSDEC was received on April 9, 2021 and indicated that the review should be complete by May 9, 2021. Garlock sent a follow-up email on July 8, 2021 (outside of this PRR's certification period) requesting an update. As of the date of this report, no further response has been received from NYSDEC. Once approval to proceed is received from NYSDEC, work should commence and documentation of activities should be maintained and included in future PRRs, as appropriate.

Furthermore, it is recommended that the requirements set forth in the SMP are implemented and documented during any future ground intrusive activities that may be conducted on-Site. This would include: documentation of implementation of health and safety plans; documentation of appropriate air monitoring activities; ensuring current soil stockpiling procedures implemented by Garlock remain in place; documentation of soil characterization and off-site disposal or on-Site re-use; and maintaining documentation of all backfill material brought to the Site for inclusion in future PRRs. This would include completing and submitting a NYSDEC Request to Import/Reuse Fill or Soil form, which can be downloaded here http://www.dec.ny.gov/regulations/67386.html, to the NYSDEC Project Manager a minimum of five (5) business days before reusing excavated soil on-Site or importing soil to the Site.

Based on the anticipated ongoing industrial use of the Site for the foreseeable future and the lack of any operations or monitoring requirements, it is recommended that the Periodic Review Report period be modified from annual to every three (3) years. A formal written request to modify the period should be submitted by Garlock to the NYSDEC and NYSDOH for review and approval.

Overall, based on the inspection and review of documentation provided by Garlock, it appears that Garlock is implementing the measures and procedures required by the SMP and it is recommended that the same procedures continue to be implemented.

Figures



QUADRANGLE LOCATION

CONTOUR INTERVAL: 10 FEET

MAPS TAKEN FROM: USGS 7.5 MINUTE SERIES
TOPOGRAPHIC QUADRANGLE:
PALMYRA, NY (2019)
(U.S. GEOLOGICAL SURVEY WEBSITE)

0 1000 2000 3000 4000'

SCALE 1"=2000' AT ORIGINAL SIZE

N

Garlock Sealing Technologies
Periodic Review Report - April 21, 2020 to
April 21, 2021 - Klozures BCP Site (#C859001)

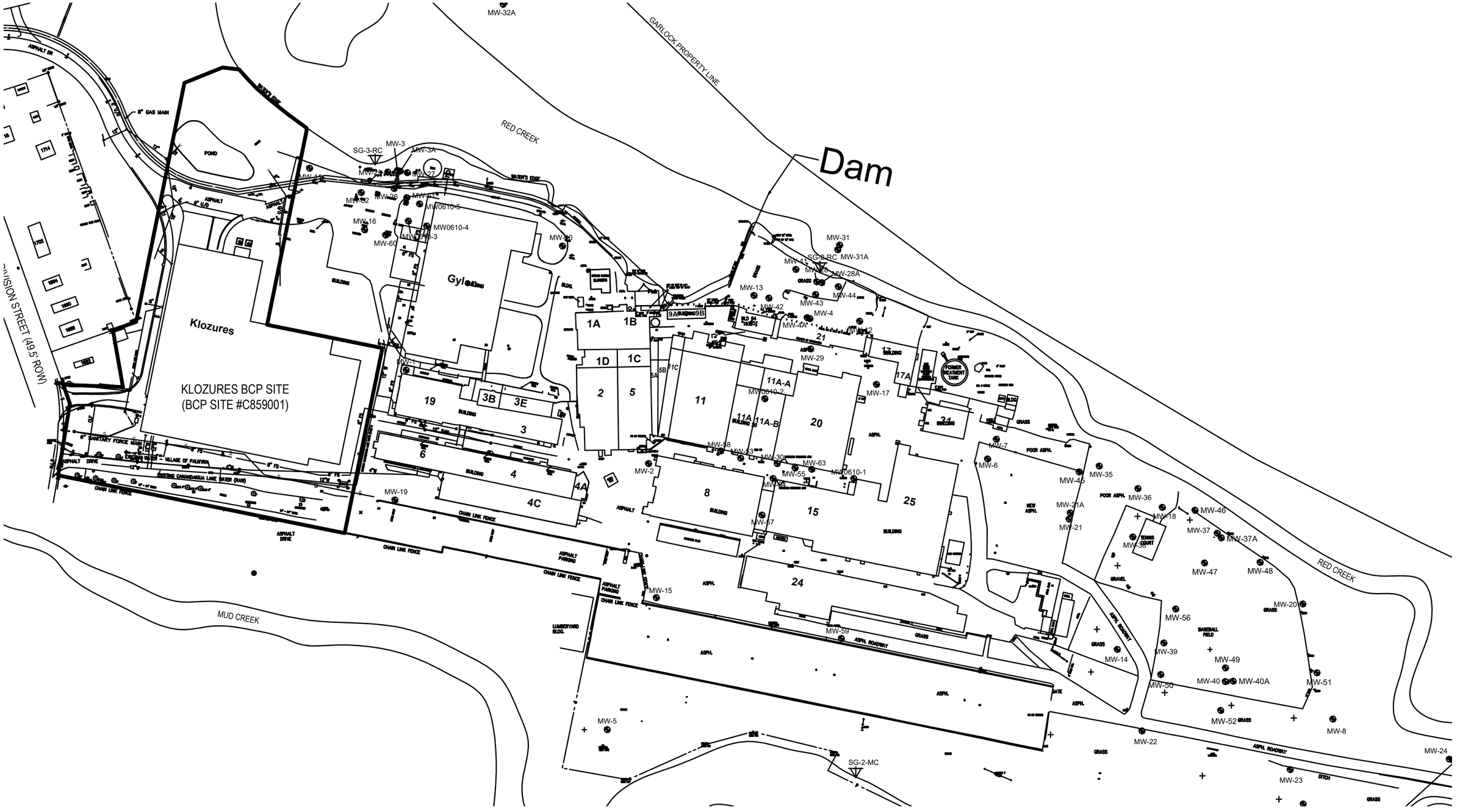
Job Number 86-15140
Revision A
Date 05.04.2021

Site Location Map

Figure 1

5788 Widewaters Parkway, Syracuse NY 13214 USA T 1 315 802 0260 F 1 315 802 0450 W www.ghd.com

Plot Date: 4 May 2021 - 3:42 PM Cad File No: N:\US\Syracuse\Projects\86\15140\PRRs\2021\Klozures\Figures\Figure 1 - Site Location Map.dwg



0 90 180 270 360'

SCALE 1"=180' AT ORIGINAL SIZE

N

NOTES:
1. Site base survey provided by Lu Engineers, 6/2006.
2. Features from survey by LaBella Associates, P.C., 10/2007.

GHD

Garlock Sealing Technologies
Periodic Review Report - April 21, 2020 to April 21, 2021 - Klozures BCP Site (#C859001)

Site Layout

Job Number	86-15140
Revision	A
Date	05.15.2021

Figure 2

Plot Date: 15 May 2021 - 7:15 AM Cad File No: N:\US\Syracuse\Projects\86\15140\PRRs\2021\Klozures\Figures\Figure 2 - Site Layout.dwg

Appendices

Appendix A

NYSDEC IC.EC Certification Form

Enclosure 2
NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
Site Management Periodic Review Report Notice
Institutional and Engineering Controls Certification Form

Site Details **Box 1**

Site No. **C859001**

Site Name Garlock - Klozures

Site Address: 1666 Division Street Zip Code: 14522
City/Town: Palmyra
County: Wayne
Site Acreage: 7.0

Reporting Period: April 21, 2020 to April 21, 2021

	YES	NO
1. Is the information above correct?	☒	☐
If NO, include handwritten above or on a separate sheet.		
2. Has some or all of the site property been sold, subdivided, merged, or undergone a tax map amendment during this Reporting Period?	☐	☒
3. Has there been any change of use at the site during this Reporting Period (see 6NYCRR 375-1.11(d))?	☐	☒
4. Have any federal, state, and/or local permits (e.g., building, discharge) been issued for or at the property during this Reporting Period?	☐	☒
If you answered YES to questions 2 thru 4, include documentation or evidence that documentation has been previously submitted with this certification form.		
5. Is the site currently undergoing development?	☐	☒

Box 2

	YES	NO
6. Is the current site use consistent with the use(s) listed below? Industrial	☒	☐
7. Are all ICs/ECs in place and functioning as designed?	☒	☐

IF THE ANSWER TO EITHER QUESTION 6 OR 7 IS NO, sign and date below and DO NOT COMPLETE THE REST OF THIS FORM. Otherwise continue.

A Corrective Measures Work Plan must be submitted along with this form to address these issues.

Signature of Owner, Remedial Party or Designated Representative Date

Box 2A

	YES	NO
8. Has any new information revealed that assumptions made in the Qualitative Exposure Assessment regarding offsite contamination are no longer valid?	☐	☒

If you answered YES to question 8, include documentation or evidence that documentation has been previously submitted with this certification form.

9. Are the assumptions in the Qualitative Exposure Assessment still valid? (The Qualitative Exposure Assessment must be certified every five years)	☒	☐

If you answered NO to question 9, the Periodic Review Report must include an updated Qualitative Exposure Assessment based on the new assumptions.

SITE NO. C859001 **Box 3**

Description of Institutional Controls

Parcel	Owner	Institutional Control
641.100-8399-37	Garlock Sealing Technologies	Ground Water Use Restriction Soil Management Plan Site Management Plan

Environmental Easement filed with Wayne County on 12/19/2006. RI with no further action and Site Management Plan approved 12/26/2006.

Box 4

Description of Engineering Controls

Parcel	Engineering Control
641.100-8399-37	~~Vapor Mitigation~~ None

Environmental Easement filed with Wayne County on 12/19/2006. RI with no further action and Site Management Plan approved 12/26/2006. ~~Vapor mitigation required.~~

NYSDEC-approved Revised SMP (GHD, May 2015) removed the requirement for vapor mitigation in the Klozures building.

Box 5

Periodic Review Report (PRR) Certification Statements

1. I certify by checking "YES" below that:

   a) the Periodic Review report and all attachments were prepared under the direction of, and reviewed by, the party making the certification;

   b) to the best of my knowledge and belief, the work and conclusions described in this certification are in accordance with the requirements of the site remedial program, and generally accepted engineering practices; and the information presented is accurate and compete.

YES	NO
☒	☐

2. If this site has an IC/EC Plan (or equivalent as required in the Decision Document), for each Institutional or Engineering control listed in Boxes 3 and/or 4, I certify by checking "YES" below that all of the following statements are true:

   (a) the Institutional Control and/or Engineering Control(s) employed at this site is unchanged since the date that the Control was put in-place, or was last approved by the Department;

   (b) nothing has occurred that would impair the ability of such Control, to protect public health and the environment;

   (c) access to the site will continue to be provided to the Department, to evaluate the remedy, including access to evaluate the continued maintenance of this Control;

   (d) nothing has occurred that would constitute a violation or failure to comply with the Site Management Plan for this Control; and

   (e) if a financial assurance mechanism is required by the oversight document for the site, the mechanism remains valid and sufficient for its intended purpose established in the document.

YES	NO
☒	☐

IF THE ANSWER TO QUESTION 2 IS NO, sign and date below and DO NOT COMPLETE THE REST OF THIS FORM. Otherwise continue.

A Corrective Measures Work Plan must be submitted along with this form to address these issues.

Signature of Owner, Remedial Party or Designated Representative

Date

IC CERTIFICATIONS
SITE NO. C859001

Box 6

SITE OWNER OR DESIGNATED REPRESENTATIVE SIGNATURE

I certify that all information and statements in Boxes 1,2, and 3 are true. I understand that a false statement made herein is punishable as a Class "A" misdemeanor, pursuant to Section 210.45 of the Penal Law.

I Anthony Rounding (print name) at Garlock Sealing Technologies, 1666 Division Street, Palmyra, NY 14522 (print business address),

am certifying as Owner (Owner or Remedial Party)

for the Site named in the Site Details Section of this form.

Signature of Owner, Remedial Party, or Designated Representative Rendering Certification

7/16/21
Date

IC/EC CERTIFICATIONS

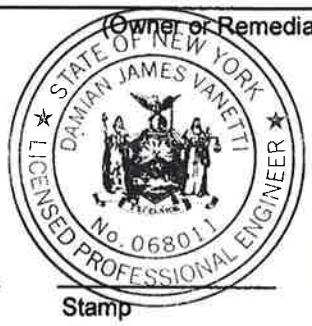
Box 7

Professional Engineer Signature

I certify that all information in Boxes 4 and 5 are true. I understand that a false statement made herein is punishable as a Class "A" misdemeanor, pursuant to Section 210.45 of the Penal Law.

I Damian J. Vanetti (print name) at GHD Consulting Services Inc. 5788 Widewaters Parkway, Syracuse, NY 13214 (print business address),

am certifying as a Professional Engineer for the Owner (Owner or Remedial Party)



Signature of Professional Engineer, for the Owner or Remedial Party, Rendering Certification

Stamp (Required for PE)

7-16-21

Date

Appendix B

PRR Annual Inspection Notes

GARLOCK SEALING TECHNOLOGIES
KLOZURES BCP SITE (SITE #C859001) INSPECTION FORM

Inspections should be done annually at a minimum, weekly in specific areas undergoing construction, and following any construction-related work performed in particular site areas.

Inspection Data Annual ☒ Construction ☐ Post-Construction ☐

Location: Garlock Palmyra NY

Inspection Date: 4-19-21

Inspected By: D. Vanetti, GHD

		Y or N	Problem Identified/Action Taken
1.	**Condition of pavement**: Are there areas of pavement or crushed stone where sub-soil is exposed?	N	
2.	**Condition of building floors** (lowest building levels): Are any cracks or gaps present?	N	Minor surface cracks
3.	**Stockpiled Materials**: Are temporary soil stockpiles or construction materials protected from erosion?	NA	
4.	**Erosion Control**: Are erosion/storm water control devices in place?	Y	
5.	**Backfill**: Has backfill been applied to excavation areas in accordance with the site Excavation Plan?	NA	
6.	**Dust Control**: Have dust control measures been implemented as needed during the conduct of construction work?	NA	

Minor rutting of soil/grassed areas adjacent to roads due to snow removal should be repaired and seeded to establish vegetation

If current inspection is construction or post-construction, describe the nature of the construction project:

NA

If the current inspection is due to an incident or accident, describe the nature of the incident/accident and the corrective measures being taken.

NA

From: GST - Maintenanceconnection
To: Sanangelo, Carrie
Subject: New Work Order (Created using the Service Requester Application)
Date: Monday, May 3, 2021 12:30:50 PM

This email has been sent to notify you that Work Order #M-106970 (Need soil rutting from snow removal repaired, please note that there is quite a bit of rutting in the lawn area adjacent to the main parking lot, heading towards Mud Creek. See Carrie for any questions) was requested using Garlock Maintenance Connection by SanAngelo, Carrie at 7338 carrie.sanangelo@garlock.com.

Thank you for using Maintenance Connection.

Appendix C

Klozures SVI and SMP Approval

Ian McNamara

From: Cloyd, Kelly (DEC) <kelly.cloyd@dec.ny.gov>
Sent: Tuesday, June 16, 2015 2:36 PM
To: Damian Vanetti
Cc: Jonathan Neubauer (InTouch); Sanangelo, Carrie; Robert Kunkel (InTouch); Ian McNamara; Kenney, Julia (HEALTH)
Subject: Klozures Revised SMP and SVI Report

Dear Mr. Vanetti:

This is to confirm that execution of the Garlock Order on Consent (C859001-10-15) constitutes approval of both the Revised Klozures Site Management Plan (SMP) (May 2015) and the Klozures BCP Site Soil Vapor Intrusion (SVI) Evaluation Report (May 2015).

If you have any questions or concerns, please contact me at 585-226-5351.

Sincerely,

Kelly C. Cloyd, Ph.D.
Engineering Geologist 2
Division of Environmental Remediation
NYSDEC - Region 8
6274 E. Avon-Lima Road
Avon , NY 14414

Appendix D

Pulcini Soil Pile Sample Results

Table 1 - (Page 1 of 4): Summary of Pulcini Soil Pile Sample Laboratory Analytical Results. Garlock. Palmyra, NY.

ANALYTE (mg/kg)	SOIL CLEANUP OBJECTIVES		SAMPLE IDENTIFICATION			
	UNRESTRICTED USE	COMMERCIAL USE	Soil Pile Grab #1, South West Side Towards Dirt	Soil Pile Grab #2, South Side Towards Dirt Road	Soil Pile Grab #3, South East Side Towards Dirt	Soil Pile Grab #4, North East Side
Sample Date			8/26/2013	8/26/2013	8/26/2013	8/26/2013
VOCs by EPA Method 8260B						
1,1,1-Trichloroethane	0.68	500	U	U	U	U
1,1,2,2-Tetrachloroethane			U	U	U	U
1,1,2-Trichloroethane			U	U	U	U
1,1-Dichloroethane	0.27	240	U	U	U	U
1,1-Dichloroethene	0.33	500	U	U	U	U
1,2,3-Trichlorobenzene			U	U	U	U
1,2,4-Trichlorobenzene			U	U	U	U
1,2,4-Trimethylbenzene	3.6	190	U	U	U	U
1,2-Dibromo-3-Chloropropane			U	U	U	U
1,2-Dibromoethane			U	U	U	U
1,2-Dichlorobenzene	1.1	500	U	U	U	U
1,2-Dichloroethane	0.02	30	U	U	U	U
1,2-Dichloropropane			U	U	U	U
1,3,5-Trimethylbenzene	8.4	190	U	U	U	U
1,3-Dichlorobenzene	2.4	280	U	U	U	U
1,4-Dichlorobenzene	1.8	130	U	U	U	U
1,4-dioxane	0.1	130	U	U	U	U
2-Butanone	0.12	500	U	U	U	U
2-Hexanone			U	U	U	U
4-Methyl-2-pentanone			U	U	U	U
Acetone	0.05	500	U	U	U	U
Benzene	0.06	44	U	U	U	U
Bromochloromethane			U	U	U	U
Bromodichloromethane			U	U	U	U
Bromoform			U	U	U	U
Bromomethane			U	U	U	U
Carbon disulfide			U	U	U	U
Carbon Tetrachloride	0.76	22	U	U	U	U
Chlorobenzene	1.1	500	U	U	U	U
Chloroethane			U	U	U	U
Chloroform	0.37	350	U	U	U	U
Chloromethane			U	U	U	U
cis-1,2-Dichloroethene	0.25	500	U	U	U	U
cis-1,3-Dichloropropene			U	U	U	U
Cyclohexane			U	U	U	U
Dibromochloromethane			U	U	U	U
Dichlorodifluoromethane			U	U	U	U
Ethylbenzene	1	390	U	U	U	U
Freon 113			U	U	U	U
Isopropylbenzene			U	U	U	U
m,p-Xylene	0.26*	500*	U	U	U	U
Methyl acetate			U	U	U	U
Methyl tert-butyl Ether	0.93	500	U	U	U	U
Methylcyclohexane			U	U	U	U
Methylene chloride	0.05	500	U	U	U	U
Naphthalene			U	U	U	U
n-Butylbenzene			U	U	U	U
n-Propylbenzene	3.9	500	U	U	U	U
o-Xylene	0.26*	500*	U	U	U	U
p-Isopropyltoluene			U	U	U	U
sec-Butylbenzene	11	500	U	U	U	U
Styrene			U	U	U	U
tert-Butylbenzene	5.9	500	U	U	U	U
Tetrachloroethene	1.3	150	U	U	U	U
Toluene	0.7	500	U	U	U	U
trans-1,2-Dichloroethene	0.19	500	U	U	U	U
trans-1,3-Dichloropropene			U	U	U	U
Trichloroethene	0.47	200	U	U	U	U
Trichlorofluoromethane			U	U	U	U
Vinyl chloride	0.02	13	U	U	U	U

All values reported as mg/kg (parts per million)

Soil Cleanup Objectives from 6 NYCRR Part 375-6.8(b) (December 2006) and Supplemental Soil Cleanup Objectives (October 2010)

U - Analyzed for but not detected above the laboratory reporting limit

J - Estimated value

Q.L. - Quantitation limit

* - applies to the sum of m-, o-, and p-xylene

Bold and thick outlined cell indicates analyte exceeds the Unrestricted Use Soil Cleanup Objective

Bold, thick outlined, and shaded cell indicates analyte exceeds the Unrestricted Use and Industrial Use Soil Cleanup Objectives

Table 1 - (Page 2 of 4): Summary of Pulcini Soil Pile Sample Laboratory Analytical Results. Garlock. Palmyra, NY.

ANALYTE (mg/kg)	SOIL CLEANUP OBJECTIVES		SAMPLE IDENTIFICATION		
	UNRESTRICTED USE	COMMERCIAL USE	Soil Pile Grab #5, West Side	Soil Pile Grab #6, West Side Top	Soil Pile Grab #7, Center Top
Sample Date			8/26/2013	8/26/2013	8/26/2013
VOCs by EPA Method 8260B					
1,1,1-Trichloroethane	0.68	500	U	U	U
1,1,2,2-Tetrachloroethane			U	U	U
1,1,2-Trichloroethane			U	U	U
1,1-Dichloroethane	0.27	240	U	U	U
1,1-Dichloroethene	0.33	500	U	U	U
1,2,3-Trichlorobenzene			U	U	U
1,2,4-Trichlorobenzene			U	U	U
1,2,4-Trimethylbenzene	3.6	190	U	U	U
1,2-Dibromo-3-Chloropropane			U	U	U
1,2-Dibromoethane			U	U	U
1,2-Dichlorobenzene	1.1	500	U	U	U
1,2-Dichloroethane	0.02	30	U	U	U
1,2-Dichloropropane			U	U	U
1,3,5-Trimethylbenzene	8.4	190	U	U	U
1,3-Dichlorobenzene	2.4	280	U	U	U
1,4-Dichlorobenzene	1.8	130	U	U	U
1,4-dioxane	0.1	130	U	U	U
2-Butanone	0.12	500	U	U	U
2-Hexanone			U	U	U
4-Methyl-2-pentanone			U	U	U
Acetone	0.05	500	U	U	U
Benzene	0.06	44	U	U	U
Bromochloromethane			U	U	U
Bromodichloromethane			U	U	U
Bromoform			U	U	U
Bromomethane			U	U	U
Carbon disulfide			U	U	U
Carbon Tetrachloride	0.76	22	U	U	U
Chlorobenzene	1.1	500	U	U	U
Chloroethane			U	U	U
Chloroform	0.37	350	U	U	U
Chloromethane			U	U	U
cis-1,2-Dichloroethene	0.25	500	U	U	U
cis-1,3-Dichloropropene			U	U	U
Cyclohexane			U	U	U
Dibromochloromethane			U	U	U
Dichlorodifluoromethane			U	U	U
Ethylbenzene	1	390	U	U	U
Freon 113			U	U	U
Isopropylbenzene			U	U	U
m,p-Xylene	0.26*	500*	U	U	U
Methyl acetate			U	U	U
Methyl tert-butyl Ether	0.93	500	U	U	U
Methylcyclohexane			U	U	U
Methylene chloride	0.05	500	U	U	U
Naphthalene			U	U	U
n-Butylbenzene			U	U	U
n-Propylbenzene	3.9	500	U	U	U
o-Xylene	0.26*	500*	U	U	U
p-Isopropyltoluene			U	U	U
sec-Butylbenzene	11	500	U	U	U
Styrene			U	U	U
tert-Butylbenzene	5.9	500	U	U	U
Tetrachloroethene	1.3	150	U	U	U
Toluene	0.7	500	U	U	U
trans-1,2-Dichloroethene	0.19	500	U	U	U
trans-1,3-Dichloropropene			U	U	U
Trichloroethene	0.47	200	U	U	U
Trichlorofluoromethane			U	U	U
Vinyl chloride	0.02	13	U	U	U

All values reported as mg/kg (parts per million)

Soil Cleanup Objectives from 6 NYCRR Part 375-6.8(b) (December 2006) and Supplemental Soil Cleanup Objectives (October 2010)

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J - Estimated value

Q.L. - Quantitation limit

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Table 1 - (Page 3 of 4): Summary of Pulcini Soil Pile Sample Laboratory Analytical Results. Garlock. Palmyra, NY.

ANALYTE (mg/kg)	SOIL CLEANUP OBJECTIVES		SAMPLE IDENTIFICATION	
	UNRESTRICTED USE	COMMERCIAL USE	Composite of Grabs #1-3	Composite of Grabs #4-6
Sample Date			8/26/2013	8/26/2013
SVOCs by EPA Method 8270C				
1,1-Biphenyl			U	U
1,2,4,5-Tetrachlorobenzene			U	U
1,2,4-Trichlorobenzene			U	U
1,2-Dichlorobenzene			U	U
1,3-Dichlorobenzene			U	U
1,4-Dichlorobenzene			U	U
2,3,4,6-Tetrachlorophenol			U	U
2,4,5-Trichlorophenol			U	U
2,4,6-Trichlorophenol			U	U
2,4-Dichlorophenol			U	U
2,4-Dimethylphenol			U	U
2,4-Dinitrophenol			U	U
2,4-Dinitrotoluene			U	U
2,6-Dinitrotoluene			U	U
2-Chloronaphthalene			U	U
2-Chlorophenol			U	U
2-Methylnapthalene	0.33	500	U	U
2-Methylphenol			U	U
2-Nitroaniline			U	U
2-Nitrophenol			U	U
3&4-Methylphenol	0.33	500	U	U
3,3'-Dichlorobenzidine			U	U
3-Nitroaniline			U	U
4,6-Dinitro-2-methylphenol			U	U
4-Bromophenyl phenyl ether			U	U
4-Chloro-3-methylphenol			U	U
4-Chloroaniline			U	U
4-Chlorophenyl phenyl ether			U	U
4-Nitroaniline			U	U
4-Nitrophenol			U	U
Acenaphthene	20	500	U	U
Acenaphthylene	100	500	U	U
Acetophenone			U	U
Anthracene	100	500	U	U
Atrazine			U	U
Benzaldehyde			U	U
Benzo (a) anthracene	1	5.6	U	U
Benzo (a) pyrene	1	1	U	U
Benzo (b) fluoranthene	1	5.6	U	U
Benzo (g,h,i) perylene	100	500	U	U
Benzo (k) fluoranthene	0.8	56	U	U
Bis (2-chloroethoxy) methane			U	U
Bis (2-chloroethyl) ether			U	U
Bis (2-chloroisopropyl) ether			U	U
Bis (2-ethylhexyl) phthalate			U	U
Butylbenzylphthalate			U	U
Caprolactam			U	U
Carbazole			U	U
Chrysene	1	56	U	U
Dibenz (a,h) anthracene	0.33	0.56	U	U
Dibenzofuran			U	U
Diethyl phthalate			U	U
Dimethyl phthalate			U	U
Di-n-butyl phthalate			U	U
Di-n-octylphthalate			U	U
Fluoranthene	100	500	U	U
Fluorene	30	500	U	U
Hexachlorobenzene			U	U
Hexachlorobutadiene			U	U
Hexachlorocyclopentadiene			U	U
Hexachloroethane			U	U
Indeno (1,2,3-cd) pyrene	0.5	5.6	U	U
Isophorone			U	U
Naphthalene	12	500	U	U
Nitrobenzene	-	69	U	U
N-Nitroso-di-n-propylamine			U	U
N-Nitrosodiphenylamine			U	U
Pentachlorophenol	0.8	6.7	U	U
Phenanthrene	100	500	U	U
Phenol	0.33	500	U	U
Pyrene	100	500	U	U

All values reported as mg/kg (parts per million)

Soil Cleanup Objectives from 6 NYCRR Part 375-6.8(b) (December 2006) and Supplemental Soil Cleanup Objectives (October 2010)

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Table 1 - (Page 4 of 4): Summary of Pulcini Soil Pile Sample Laboratory Analytical Results. Garlock. Palmyra, NY.

ANALYTE (mg/kg)	SOIL CLEANUP OBJECTIVES		SAMPLE IDENTIFICATION			
	UNRESTRICTED USE	COMMERCIAL USE	Composite of Grabs #1-3		Composite of Grabs #4-6	
Sample Date			8/26/2013		8/26/2013	
Metals by EPA Method 6010C						
Arsenic	13	16	3.26		3.74	
Barium	350	400	43.5		44	
Beryllium	7.2	590	0.382	J	0.373	J
Cadmium	2.5	9.3		U		U
Chromium	30	1,500	12.5		12.2	
Copper	50	270	10.5		11.7	
Lead (Axial)	63	1,000	15.5		13	
Manganese	1,600	10,000	598		547	
Nickel	30	310	10.7		10.7	
Selenium	3.9	1,500		U		U
Silver	2	1,500		U		U
Zinc	109	10,000	57		57.1	
Mercury by EPA Method 7471B						
Mercury	0.18	2.8	0.0431		0.0387	
Cyanide by EPA Method 9014						
Cyanide	27	27		U		U
Chromium by EPA Method 7196						
Chromium, Hexavalent	1	400		U		U
PCBs by EPA Method 8082A						
PCB-1016				U		U
PCB-1221				U		U
PCB-1232				U		U
PCB-1242				U		U
PCB-1248				U		U
PCB-1254				U		U
PCB-1260				U		U
PCB-1262				U		U
PCB-1268				U		U
Total PCBs	0.1	1	ND		ND	
Pestcides by EPA Method 8081B						
4,4-DDD	0.0033	92		U		U
4,4-DDE	0.0033	62		U		U
4,4-DDT	0.0033	47		U		U
Aldrin	0.005	0.68		U		U
alpha-BHC	0.02	3.4		U		U
beta-BHC	0.036	3		U		U
cis-Chlordane	0.094	24		U		U
delta-BHC	0.04	500		U		U
Dieldrin	0.005	1.4		U		U
Endosulfan I	2.4	200		U		U
Endosulfan II	2.4	200		U		U
Endosulfan Sulfate	2.4	200		U		U
Endrin	0.014	89		U		U
Endrin Aldehyde				U		U
Endrin Ketone				U		U
gamma-BHC (Lindane)	0.1	9.2		U		U
Heptachlor	0.042	15		U		U
Heptachlor Epoxide				U		U
Methoxychlor				U		U
Toxaphene				U		U
trans-Chlordane				U		U

All values reported as mg/kg (parts per million)

Soil Cleanup Objectives from 6 NYCRR Part 375-6.8(b) (December 2006) and Supplemental Soil Cleanup Objectives (October 2010)

U - Analyzed for but not detected above the laboratory reporting limit

J - Estimated value

C - Concentration differs by more than 40% between the primary and secondary analytical columns

D - Sample, Laboratory Control Sample, or Matrix Spike Duplicate results above Relative Percent Difference limit

M - Matrix spike recoveries outside QC limits. Matrix bias indicated.

Q.L. - Quantitation limit

ND - Non-Detect

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