

11541 95th Avenue North Minneapolis, MN 55369 Tel: 763-315-4501 Fax: 763-315-4507

Distributed via eMail

June 9, 2017

Ms. Danielle Miles New York State Department of Environmental Conservation Division of Environmental Remediation 6274 East Avon-Lima Road Avon, New York 14414-9519

Subject: Former Monarch Chemicals Facility 61 Gates Avenue - Geneva, New York VCP No. V00119-8, Project Status Report – June 2017

Dear Ms. Miles:

Pinnacle Engineering Inc., (Pinnacle), on behalf of H.B. Fuller Company (H.B. Fuller), is pleased to submit the following project status report (PSR) for June 2017 related to activities conducted at the Former Monarch Chemicals Facility, located at 61 Gates Avenue, Geneva, New York. This report is prepared pursuant to the Voluntary Cleanup Agreement (VCA) between H.B. Fuller and the New York State Department of Environmental Conservation (NYSDEC), VCP No. V00119-8.

Actions Taken During the Reporting Period

- H.B. Fuller provided requested information to AECOM, NYSDECs consultant, regarding information and data to submit and file a Deed Notice for the site.
- Reviewed May 16, 2017 letter from NYSDEC containing comments of the <u>Site Management Plan</u> (SMP), dated March 31, 2017.
- Met NYSDEC staff on-site May 31, 2017 to conduct a site walkover, and attended a meeting to discuss SMP comments in Region 8 Avon office.

Actions Anticipated for the Next Reporting Period

- In response to the May 16, 2017 NYSDEC letter, and per 6 NYCRR Part 375-1.6, H.B. Fuller will notify NYSDEC which of following options chosen to address these SMP comments:
 - Modify the SMP to address NYSDEC comments and submit a revised SMP;
 - Invoke dispute resolution; or,
 - > Terminate the Voluntary Cleanup Agreement.

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Activity Modifications (Changes in Work Scope and\or Schedule)

There were no changes or modifications to the RI or IRM during the reporting period.

Results of Sampling Activities and Other Data Received

There were no sampling events or data received during the reporting period.

Agency Communications

On May 31, 2017, H.B. Fuller met with NYSDEC staff on-site to evaluate site conditions and review corrective action and monitoring activities completed on-site. Following this site walkover, HB Fuller met with NYSDEC staff in the Region 8 Avon office to review the May 16, 2017 SMP comment letter. During that meeting it was mutually agreed that both NYSDEC and H.B. Fuller staff review historical files to gather data and correspondence before that SMP decision can be made. H.B. Fuller agreed it can comply with this review, and will be prepared for the file review completed by NYSDEC staff. Accordingly, H.B. Fuller respectfully requested an extension from NYSDEC for this communication to the end of the business day, June 15, 2017 to prepare and convey this decision.

IRM Status

The IRM has been implemented and reported to NYSDEC October 29, 2012 in the <u>Interim Remedial</u> <u>Measures (IRM) Status Completion Report</u>. In a letter dated February 21, 2013, NYSDEC accepted this report, with comments, and no further work or revisions are expected regarding the IRM implementation. With this task completed, and the efficiency and effectiveness of the implemented IRM complete and accepted by NYSDEC, this project can move to closure.

Remedial Investigation Status

The *Data Gap Remedial Investigation Report* was submitted to NYSDEC June 15, 2012. The RI was accepted, with comments by NYSDEC, February 21, 2013.

Percent Completion Estimate

The IRM has been implemented. The groundwater and sub-slab air sampling data document the IRM progressed as planned, and is 100% complete.

Unresolved Delays and Mitigative Efforts

None during the reporting period.

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Pinnacle believes this report fulfills the reporting requirements for the VCA. If you have any questions please feel free to contact me at (763) 277-8422.

Sincerely,

PINNACLE ENGINEERING, INC.

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Keith B. Rapp Senior Hydrogeologist\Senior Project Manager PINNACLE ENGINEERING, INC.

- cc: Kristin Colberg Justin Deming Julia Kenney Bernette Schilling Dennis Harkawik Jack Spicuzza Bill Anthony Bob Wojciak
- H.B. Fuller\St. Paul
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