

October 7, 2019

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: Corrective Measures Workplan – Periodic Review Report IC/EC Certification
Former Monarch Chemicals Facility
61 Gates Avenue - Geneva, New York 14456
Site No. V00119-8**

Dear Ms. Miles:

Pinnacle Engineering Inc., (Pinnacle), on behalf of H.B. Fuller Company (H.B. Fuller), is submitting this Corrective Measures Workplan (Workplan) to the New York State Department of Environmental Conservation (NYSDEC) for the Former Monarch Chemicals Facility, located at 61 Gates Avenue, Geneva, New York. This Workplan has been prepared to specifically address the disapproval of the Periodic Review Report (PRR), dated July 23, 2019, and associated certifications for Institutional Control/Engineering Controls (IC/EC) pursuant to the site inspection and certification requirements for the Site Management Plan (SMP), dated September 22, 2017.

Background

As outlined in the PRR, site inspections were completed July 16, 2019 for the 1st PRR reporting period, extending from August 9, 2017 to June 23, 2019. The elements of the PRR are outlined in the SMP in place for this property, including the IC/EC controls. Institution controls described in the SMP include:

- Groundwater use restriction;
- Land use restriction consistent with commercial and/or industrial use;
- Annual periodic review reports and certification of institutional and engineering controls; and,
- Annual groundwater and sub-slab/indoor air monitoring.

Engineering controls described in the SMP include:

- Maintenance of protective soil cover consisting of soil, gravel, building, asphalt, and concrete.

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As described in DER-10/Technical Guidance for Site Investigation and Remediation (NYSDEC - Program Policy - May 3, 2010), in the event that a periodic certification cannot be provided due to a failure of one or more of the IC/ECs, the remedial party will provide NYSDEC with the following:

1. Timely notification explaining the cause for such failure;
2. Workplan to implement corrective measures necessary to enable the certification to be made; and,
3. Schedule for implementing the Department-approved corrective measures, and requisite submission of a revised PRR with the required certification.

With regards to the requirements outlined in 1 through 3 above, NYSDEC was notified of the first item with the submittal of the PRR on July 23, 2019. Under the provisions of DER-10 for a PRR when certification was not provided, or not deemed appropriate, the Department may “*direct that additional corrective measures be proposed*”. In a NYSDEC letter to H.B Fuller dated September 20, 2019, the Department notified H.B. Fuller of the disapproval of the July 23, 2019 PRR, and was directed to “*submit a Corrective Measures Work Plan (Work Plan) within 30 days of receipt of this letter. The Work Plan must include a schedule for completing two rounds of groundwater monitoring by June 23, 2020 along with an explanation of why annual groundwater monitoring was not completed in 2018 and how monitoring will be ensured in the future*”.

Schedule of Compliance

Failure to complete groundwater sampling in 2018 was created by a mishap in scheduling. As noted in the NYSDEC September 20, 2019 letter, groundwater monitoring and sub-slab soil vapor/indoor air (SVI) sampling was completed December 9 – 11, 2017. In response to a later NYSDEC and NYSDOH request for additional indoor air sampling, supplementary SVI sampling was completed March 2 and March 4, 2018. Groundwater sampling was not completed in March 2018. Inadvertently, groundwater sampling was not scheduled later during the 2018 Heating Season, generally expected to be from November 15th to March 31st, and the opportunity to collect annual groundwater samples was missed for calendar year 2018.

Going forward, based on the limitations of completing heating season SVI sampling and groundwater synoptically, the 2019 annual sampling will be completed the first week of December 2019. To comply with the requirement of a second sampling event prior to June 23, 2020, a groundwater sampling event will be completed the last week of March 2020. Starting in 2021, and to ensure that groundwater and SVI sampling is completed annually, the first week of December will be default sampling period each year, and this event will be placed on our sampling calendar for this project. A copy of that schedule is attached to this Workplan.

Once the sampling schedule and contents of this Workplan are approved by the Department, and the corrective measures have been implemented, a revised PRR will be submitted to NYSDEC, and these procedural changes will be incorporated into the SMP.

If you have any questions please feel free to contact me at (612) 382-3763.

Sincerely,

PINNACLE ENGINEERING, INC.



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

Enclosure – Table 1 - 2019 - 2020 and Annual Sampling Schedule

cc:	Kristin Colberg	- H.B. Fuller\St. Paul
	Julia Kenney	- NYSDOH\Albany
	Bill Anthony	- Pinnacle\Joplin
	Bob Wojciak	- Pinnacle\Piney Flats



**Pinnacle
Engineering**

Month	Dec-19				Jan-20				Feb-20					Mar-20					Apr-20					May-20					Jun-20					Jul-20					Aug-20					Sep-20					Oct-20					Nov-20					Dec-20				
Week	49	50	51	52	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52							
	X															X																X																	X														

groundwater\SVI sampling event

PRR Due

Annual Sampling Event Schedule