

Antea USA, Inc. 5788 Widewaters Parkway, 2nd Floor Syracuse, NY 13214 USA www.anteagroup.com

September 12, 2018

David Szymanski New York State Department of Environmental Conservation Division of Environmental Remediation 270 Michigan Avenue Buffalo, NY 14203-2915

Subject: 2016 Periodic Review Report Former Champion Products Facility 200 North Main Street Perry, New York 14530 NYSDEC Site No. V00189

Dear Mr. Szymanski,

On behalf of Hanesbrands, Inc. (Hanesbrands), Antea[®] Group has prepared this Periodic Review Report (PRR), which documents the implementation of, and compliance with, the site-specific Site Management (SM) requirements detailed in the New York State Department of Environmental Conservation (NYSDEC) approved Site Management Plan (SMP), dated March 2013. The reporting period covered for this PRR is from August 2017 to August 2018 and includes quarterly inspection events conducted in October 2017, February and April 2018 and the annual event in July 2018. Certification documents are presented in Attachment 1. As required by the NYSDEC, an individual hardcopy of the original signed certification documents will be sent under separate cover as well as by electronic format.

1.0 EXECUTIVE SUMMARY

The Former Champion Products Facility (the "site") is a 26-acre property with a 150,000 square foot (s.f.) building and a separate 9,600 s.f. bus garage located in the Village of Perry, New York. The site was owned and operated by Champion Products, Inc. (Champion) from 1955 to 1998. In 1998, the property was sold to SMG Development LLC (SMG). From 1998 until December 2001, Champion leased the building from SMG. In January 2002, American Classic Outfitters (ACO) was formed and operated at the site through November 2009 when ACO sold its business to Liebe of New York. The facility has been primarily used since 1955 for the manufacture of print screen apparel and custom sports apparel for sports teams and retail sale.

In March 2000, Champion entered into a Voluntary Cleanup Agreement (VCA) with NYSDEC for the remediation of soil and groundwater underlying the facility, which was impacted by chlorinated and non-chlorinated volatile organic compounds (VOCs). Remediation activities included: excavation of impacted soils, installation and operation of a dual phase vapor extraction system (DPVE) and installation and operation of a



sub-slab depressurization system (SSDS). Engineering controls (EC) have been incorporated into the site remedy to control exposure during the use of the site. Institutional controls (ICs) were also placed on usage of the site and mandate operation, monitoring and reporting measures for all ECs and ICs through the NYSDEC approved SMP.

During the reporting period, ECs were effective in controlling exposure during site use and have ensured protection of worker safety, public health and the environment. Over this period, the SSDS has performed within its design specifications and has achieved remedial objectives. Cover systems have also remained intact and have remained effective in limiting exposure. ICs placed on the site have remained unchanged and nothing has occurred onsite that impairs the ability of the controls to protect human health or the environment. ICs remain unchanged at the site.

2.0 SITE OVERVIEW

The site is located at 200 North Main Street in the Village of Perry, County of Wyoming, New York and is approximately 26-acres in size (**Figures 1** and **2**). The site is bounded by North Main St., commercial properties and residential properties to the north, vacant wooded land to the south, farmland and residential properties to the east, and residential properties and North Genesee St. to the west. The main onsite building is approximately 150,000 s.f. in size with a section that is approximately 75,000 s.f., which is not part of the site (**Figure 3**). In 2014, a 9,600 s.f., three bay, steel frame construction, bus garage was constructed in the northeast corner of the site and is now utilized for parking of busses (**Figure 1**). The bus garage is located approximately 600 feet north-northeast of the main building in a paved parking area.

Site History

The site was owned and operated from 1955 until 1998 by Champion, an affiliate of the Sara Lee Corporation. In 1998, the property was sold to SMG, the current owner of the site. Following the sale, Champion leased the building from SMG and continued operations at the site until December 2001. In January 2002, ACO was formed and has operated at the site as a tenant from January 2002 through November 30, 2009. ACO then sold its business to Liebe of New York which has continued the same type of operations as ACO and is the current tenant at the site. Irrespective of ownership, the main facility has been primarily used since 1955 for the manufacture of print screen apparel and custom sports apparel for sports teams and retail sale.

Nature and Extent of Impacts

In 2007 and 2008 a Sub-slab Soil Investigation (SSI) was performed to determine if remedial activities had achieved remedial goals. Findings indicated that remedial activities had reduced VOC concentrations in saturated soils beneath known source areas to levels that met and/or closely approximated unrestricted use and protection of groundwater Part 375 Soil Clean up Objectives (SCOs). The SSI also indicated that VOC concentrations in groundwater were still slightly above applicable NYSDEC groundwater standards but that natural attenuation was occurring

Remedial History

Remedial activities were conducted and/or are ongoing in accordance with the Final Remediation Work Plan (February 11, 2000), Remedial Work Plan for Soil Vapor Remediation (April 2011) and SMP (March 2013). Activities include:

- Excavation of the former screen wash vault and soil exceeding SCOs (1999);
- Excavation of soil exceeding SCOs in the Former Empty Drum Storage Area (2000);
- Installation and operation of a DPVE system (2000 to 2007);

- Installation (2011) and ongoing operation of a sub slab depressurization system in three areas of the building interior;
- Execution and recording of a Declaration of Covenants and Deed Restrictions (2013);
- The use of cover systems to limit exposure to remaining VOC impacts (ongoing);
- Development and implementation of a Site Management Plan (2013); and
- Removal of piping associated with the former DPVE system (June 2015).

Operation of the SSDS is ongoing and there have been no changes to the EC since installation and start up occurred in 2011.

3.0 REMEDY EVALUATION

ECs and ICs were evaluated during the noted reporting period to determine if they were effective and remained protective of public health and the environment. The evaluation determined that:

- The SSDS was operating within specifications and was performing in accordance with operational requirements by maintaining the required negative pressure beneath the three interior remedial areas.
- The soil cover system was in good condition in the former drum storage area and did not require maintenance (e.g. good vegetation, no animal borrows, no erosional features, storm water BMP are free of debris).
- Floor slabs (cover systems) in the area of the SVI mitigation system remained intact and in good condition. Maintenance was not required and no cracking was noted.
- All ECs were working as intended and continue to be effective.
- All ECs are being operated and maintained as specified in the SMP.
- Site usage for the main building was the same as previously reported and facility personnel indicated that there were no changes to site operations.
- A garage used for daily parking of buses currently operates in a paved parking area located in the northeast corner of the site (**Figure 1**). No issues as a result of these operations were reported.
- ICs identified in the Declaration of Covenants and Restrictions are being maintained at the site.

4.0 EC/IC PLAN COMPLIANCE REPORT

A summary of each control, objective and status is detailed below. Certification documents are presented in Attachment 1.

EC – Cover Systems

Exposure to remaining VOC impacts in soil/fill at the site is prevented by the use of two types of cover systems. In the former empty drum storage area, which is located outside of the south central area of the building, the cover system is comprised of a minimum of 6 feet of soil backfill (**Figure 3**). In the interior of the building, the cover system is comprised of the building's existing 4 -inch to 6-inch thick concrete floor slabs (**Figure 3**). The cover systems are permanent controls and the quality and integrity of these systems is verified by quarterly and annual inspections, which evaluate the integrity of the cover materials. These systems were fully in place and completely effective during the reporting period. Corrective measures are not required.

EC – Sub-slab Depressurization System

SSDSs were installed in three areas (SSDS-3, SSDS-4 and SSDS-5) at the site to address sub-slab soil vapor in areas of the site where previous indoor air and sub-slab vapor sampling indicated the presence of VOCs at

concentrations in excess of the New York State Department of Health (NYSDOH) decision matrix recommended action levels for monitoring and/or mitigation (**Figure 3**). The SSDS at each area consists of a series of 2 to 3 sub-slab suction points (installed in high permeability material), which are connected by 3-inch PVC piping to exterior mounted low volume blower units. Each unit vents sub-slab vapor to the outdoor air. Vacuum at each suction point is measured by liquid filled U-tube manometers, which are installed on riser piping. The objective of the SSDS in each area is to create a vacuum field of at least 0.004" water column under the slab across each area to mitigate vapor intrusion. Each SSDS is designed to operate independently and continuously. Operation of the systems are verified by quarterly and annual inspections, which monitor the vacuum field and blower operations. These systems were fully in place and completely effective during the reporting period. Corrective measures are not required.

ICs

The site has a series of ICs in the form of site restrictions. Adherence to the ICs is required by the Declaration of Covenants and Restrictions. Restrictions that apply to the Controlled Property (property) are:

- Implement, maintain and monitor EC systems.
- Prevent future exposure to remaining VOC impacts by controlling disturbances of the impacted subsurface media.
- Limit the use and development of the site to commercial or industrial type usages.
- Prohibit use of the groundwater underlying the property without treatment rendering it safe for drinking water or industrial purposes,
- Comply with the site restrictions in the Declaration of Covenants and Restrictions.

Compliance with the ICs is evaluated during quarterly and annual inspections. The ICs were fully in place and effective during the reporting period. Corrective measures are not required.

5.0 OPERATIONS & MAINTENANCE PLAN COMPLIANCE REPORT

The operation and maintenance (O&M) requirements of the SSDS systems include quarterly inspections and/or, if needed, more frequent checks to verify the individual systems are operational. Each SSDS is designed to run constantly, operator free with very little maintenance. Upon balancing flow after initial start-up, only minor adjustments to flow at the various suction points, if any, are required to maintain proper vacuum. Inspection documentation is provided in Attachment 2.

During the reporting period there were minimal flow adjustments required to achieve a balanced vapor gradient. The SSDS is operating as designed and per expectations. System modifications are not recommended at this time.

6.0 CONCLUSIONS AND RECOMMENDATIONS

During the reporting period all requirements of the SMP were met. The ECs were effective in controlling exposure during use of the site, ensuring protection of public health and the environment. Over the reporting period, the SSDS performed within its design specifications and achieved remedial objectives. The cover systems remained intact and was effective in limiting exposure over the reporting period. ICs placed on the site have remained unchanged and nothing has occurred onsite that impairs the ability of the controls to protect human health or the environment over the reporting period. ECs and ICs are completely effective; therefore Antea Group does not recommend any changes to the SMP.

If you have any questions regarding this submittal, please feel free to contact me by phone at (315) 949-7036 or by email (Katie.Angel@anteagroup.com).

Sincerely,

Marine Unger

Katharine Angel Project Professional Antea Group

CC: Chris Fox – Hanesbrands, Inc.

Caron Loll

Caron Koll, PG, LSP Consultant Antea Group

ATTACHMENT 1

CERTIFICATIONS



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



¢	te No. V00189	Site Details	Box	1
Si	te Name Champion Products Comp	any		
Ci Co	te Address 200 N. Main Street ty/Town Perry punty. Wyoming te Acreage, 26.0	Zıp Code [,] 14530		
Re	eporting Period. August 14, 2017 to Au	gust 14, 2018		
	'		YES	NO
1	Is the information above correct? \cdot		X	
	If NO, include handwritten above or o	n a separate sheet		
2	Has some or all of the site property be tax map amendment during this Repo	een sold, subdivided, merged, or undergone a rting Period?	מ	X
3	Has there been any change of use at (see 6NYCRR 375-1.11(d))?	the site during this Reporting Period		X
4.	Have any federal, state, and/or local p for or at the property during this Repo	ermits (e.g , building, discharge) been issued rting Period?	٥	×
		thru 4, include documentation or evidence ously submitted with this certification form		
5.	Is the site currently undergoing develo	pment?		X
			Box 2	
			YES	NO
6.	Is the current site use consistent with t Commercial and Industrial	he use(s) listed below?	X	
7	Are all ICs/ECs in place and functionin	g as designed?	X	[]
		JESTION 6 OR 7 IS NO, sign and date below a REST OF THIS FORM. Otherwise continue.	nd	
A C	orrective Measures Work Plan must be	submitted along with this form to address th	iese iss	ues.
Sigr	ature of Owner, Remedial Party or Desig	nated Representative Date		

SITE NO. V00189		Вож
Description o	Institutional Controls	
<u>Parcel</u> 88.20-3-16.1	<u>Owner</u> American Classic Outfitters	<u>Institutional Control</u> Ground Water Use Restricti Building Use Restriction O&M Plan
		Soil Management Plan
Deed Restriction incl - Prohibition of grou		Site Management Plan IC/EC Plan
 Prohibition of grou Restriction of Use childcare/day care fa - Adherence to appr 	ndwater use without treatment to Commercial or Industrial use (which Comme cilities, hospitals, residential health care facilitie oved Site Management Plan (SMP) which incli n.	IC/EC Plan ercial or Industrial use shall not includ es. vegetable gardens, and farming
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			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 direct reviewed by, the party making the certification,	ion of,	and
	b) to the best of my knowledge and belief, the work and conclusions described in are in accordance with the requirements of the site remedial program, and genera engineering practices; and the information presented is accurate and compete		
		YES	NO
	1	¥	
2.	If this site has an IC/EC Plan (or equivalent as required in the Decision Document), for e or Engineering control listed in Boxes 3 and/or 4, I certify by checking "YES" below that a following statements are true		
	(a) the Institutional Control and/or Engineering Control(s) employed at this site is us since the date that the Control was put in-place, or was last approved by the Depa		
	(b) nothing has occurred that would impair the ability of such Control, to protect put the environment,	ıblic he	ealth and
	(c) access to the site will continue to be provided to the Department, to evaluate th remedy, including access to evaluate the continued maintenance of this Control,	le	
	(d) nothing has occurred that would constitute a violation or failure to comply with t Site Management Plan for this Control, and	he	
	(e) if a financial assurance mechanism is required by the oversight document for the mechanism remains valid and sufficient for its intended purpose established in the mechanism remains valid and sufficient for its intended purpose established in the mechanism remains valid and sufficient for its intended purpose established in the mechanism is required by the oversight document for the mechanism is required by the oversight document for the mechanism is required by the oversight document for the mechanism is required by the oversight document for the mechanism is required by the oversight document for the mechanism is required by the oversight document for the mechanism is required by the oversight document for the mechanism is required by the oversight document for the mechanism is required by the oversight document for the mechanism is required by the oversight document for the mechanism is required by the oversight document for the mechanism is required by the oversight document for the mechanism is required by the oversight document for the mechanism is required by the oversight document for the mechanism is required by the oversight document for the mechanism is required by the oversight document for the mechanism is required by the mech		
	Y	ES	NO
	X	Ś	D
	IF THE ANSWER TO QUESTION 2 IS NO, sign and date below and DO NOT COMPLETE THE REST OF THIS FORM. Otherwise continue.		
А	Corrective Measures Work Plan must be submitted along with this form to address thes	e issu	es.
s	ignature of Owner, Remedial Party or Designated Representative Date		

(
IC CERTIFICATIONS SITE NO. V00189
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
Antea Group <u>I Caron Koll, LSP, PG-PA</u> at 5788 Widewaters Parkway, Syr. NY, 13124 print name print business address
am certifying as a Qualfied Environmental Proffessional (Owner or Remedial Party)
for the Site named in the Site Details Section of this form.

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IC/EC CERTIFICATIONS

Box 7

Qualified Environmental Professional 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

Antea Group at 5788 Wile waters Parkway, print business address Syr, NY 13214 1 (aron print name Remedial am certifying as a Qualified Environmental Professional for the (Owner or Remedial Party) Sipt 11, 2018 Signature of Qualified Environmental Professional, for Stamp the Owner or Remedial Party, Rendering Certification (Required for PE)

ATTACHMENT 2

INSPECTION REPORTS

Quarterly System Inspection

Hanesbrands, Inc.

200 North Main Street, Perry, New York

Quarter/Date: 4Qr ~ Oct. 19, 2017 SUNNYA Weather: 60 m asty (A Atea Group) Personnel: HING

	Area SS-5	Area SS-5 / Former Remedial Area		Area SS-4 / Storage		Area SS-3 / Storage	
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Floor and PVC seals ok (Y/N)	Ý	Y	V	Y	7	Ý	Y
System Operating (Y/N)		У			Y	¥ '	
Overall Piping Run ok (Y/N)		Υ.			Y	✓	
Blower Functioning Correctly (Y/N)		Υ.	Y.		Ý		l l
Exterior casings intact (Y/N)		\checkmark		У		Ý	

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Quarterly System Inspection Hanesbrands, Inc. 200 North Main Street, Perry, New York

Quarter/Date: 15t Q 201 8 - Feb 15,2018 Weather: A ~400 cloudy. Personnel:

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Quarterly System Inspection Hanesbrands, Inc.

200 North Main Street, Perry, New York

2018, April 24,2018 Quarter/Date: Weather: Personnel:

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Quarterly System Inspection

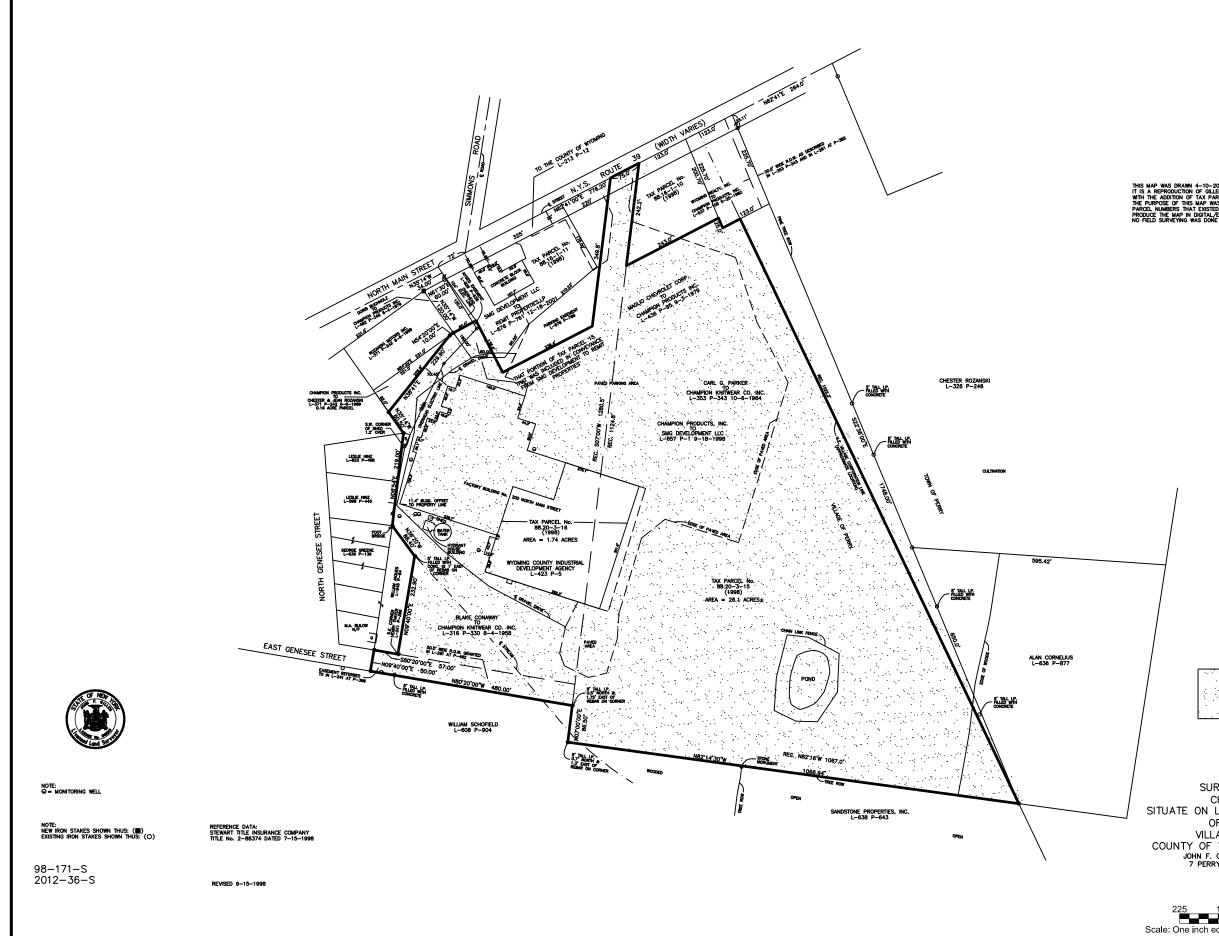
Hanesbrands, Inc. 200 North Main Street, Perry, New York

7/25/18 Quarter/Date: 3018 Weather: Bainy , 80 Angel Personnel:

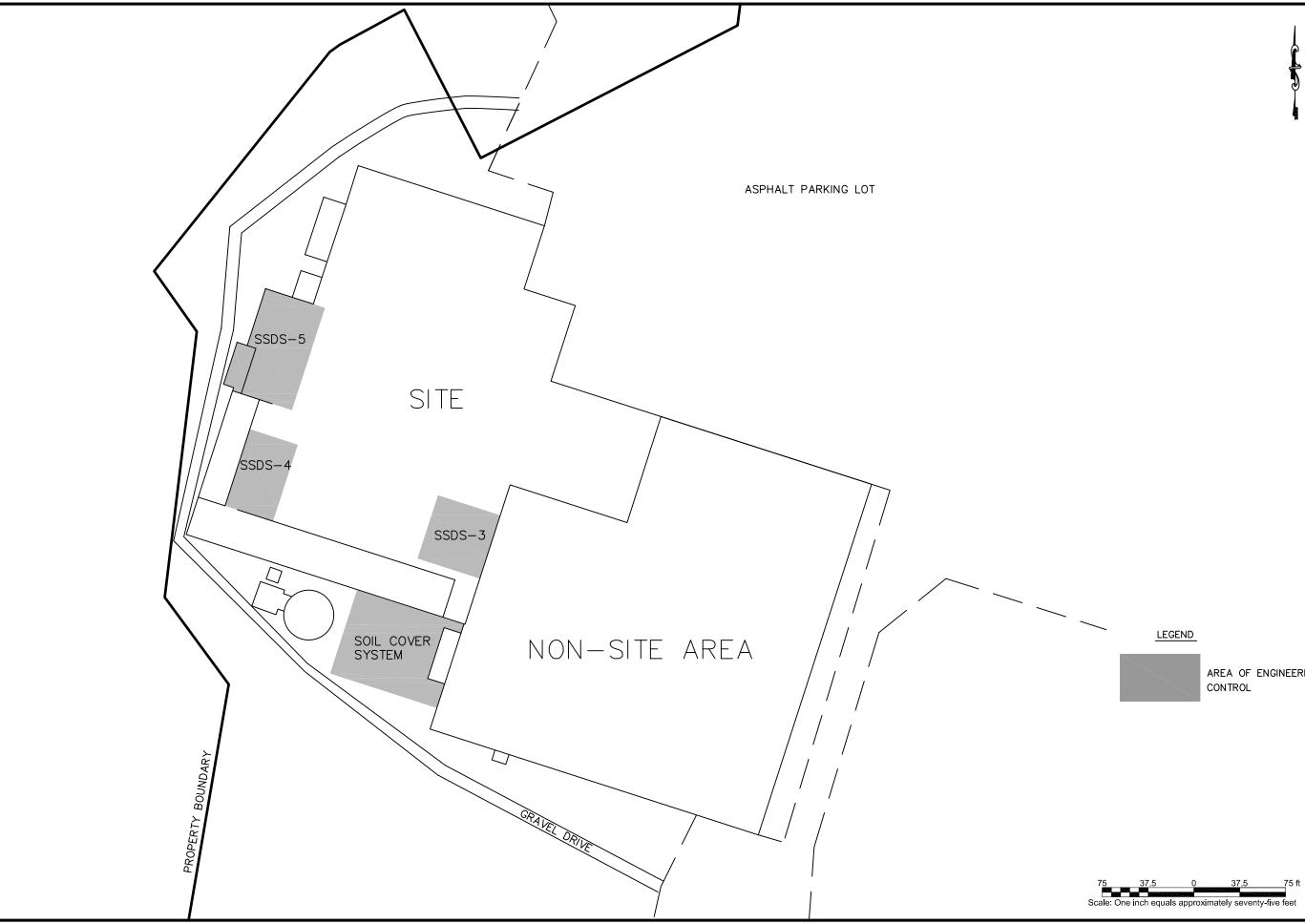
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		FORMER CHAMPION PRODUCIS FACILITY	ZUU IN. INIAIN SIKEEI DEDDV NIV	



AREA OF ENGINEERING