

October 24, 2023

Megan Kuczka
New York State Department of Environmental Conservation
Division of Environmental Remediation
700 Delaware Avenue
Buffalo, NY 14209

Subject: 2023 Periodic Review Report
Former Champion Products Facility
200 North Main Street
Perry, New York 14530
NYSDEC Site No. V00189

Dear Ms. Kuczka:

On behalf of Hanesbrands, Inc. (Hanesbrands), AG Geology & Engineering, D.P.C. (AG Geology) 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 2022 to August 2023 and summarizes the annual inspection event conducted in August 2023, monitoring well abandonment conducted in November 2022, and soil vapor sampling conducted in December 2022. Based on the results of the investigations conducted during this reporting period, AG Geology requested that use of the sub-slab depressurization system (SSDS) be discontinued. Per NYSDEC approval in May 2023, use of the SSDS was discontinued. Certification documents are presented in **Appendix A**.

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 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 manufacturing 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 the 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. Cover systems have also remained intact and have remained effective in limiting exposure. Over this period, the NYSDEC approved discontinuation of the

SSDS. AG Geology is updating the SMP is being updated to reflect the termination of the SSDS and will be submitting a revised SMP to the NYSDEC in October for approval.

ICs placed on the site have remained unchanged and nothing has occurred on-site that impairs the ability of the controls to protect human health or the environment.

2.0 SITE OVERVIEW

The site is located at 200 North Main Street in Perry, Wyoming County, New York and is approximately 26-acres in size (**Figures 1 and 2**). The site is bound 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 on-site 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 buses (**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 manufacturing 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.

In 2021 and 2022, a Subsurface investigation was performed to evaluate remaining VOCs concentrations onsite following years of natural attenuation and SSDS operation. Findings indicated soil and groundwater VOC impacts at the site were below applicable NYSDEC soil and groundwater standards.

REMEDIAL HISTORY

Remedial activities were conducted and/or are on-going 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 operation of a sub-slab depressurization system (SSDS) in three areas of the building interior (2011 -2023);
- Execution and recording of a Declaration of Covenants and Deed Restrictions (2013);
- The use of cover systems to limit exposure to remaining VOC impacts (on-going);

- 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 has been discontinued and the SMP is being updated to reflect the change in ECs.

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 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 soil vapor mitigation system were noted to be intact and in good condition at SSDS-4 and SSDS-5. A crack in the floor slab was identified in the vicinity of SSDS-3 during vapor intrusion investigation (VII) sampling conducted on January 4, 2022. This crack was repaired during monitoring well decommissioning activities in November 2022.
- The SSDS was shut-off and capped during the previous December 2021 vapor intrusion investigation to allow the site to return to its equilibrium status prior to the vapor intrusion sampling activities. It was confirmed the SSDS was still shut-off and capped during monitoring well decommissioning activities conducted between November 28 and 30, 2022 prior to vapor intrusion sampling activities conducted on December 13, 2022. During this November visit the SSDS was turned back on briefly for testing to confirm it could still perform in accordance with operational requirements by maintaining the required negative pressure beneath the three interior remedial areas. During this testing suction was not able to be generated consistently in Area SS-3. The SSDS was then returned off to support vapor sampling activities. The SSDS remained off following approval from the NYSDEC to terminate use of the system.
- 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.
- Facility personnel indicated that concrete slabs west of the soil cover area are to be removed and restored to vegetation.
- Facility personnel indicated a solar panel farm is to be installed east of the onsite building by mid-2024.
- 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.

Locations of the proposed concrete slab demolition and solar panels are shown on **Figures 1** and **3**. Inspection documentation is provided in **Appendix B**. Photographs taken during the August 2023 inspection are included in **Appendix C**.

4.0 EC/IC PLAN COMPLIANCE REPORT

A summary of each EC and IC control, objective, and status are detailed below. Certification documents are presented in **Appendix A**.

The site has two associated ECs; a cover system and a sub-slab depressurization system. Maintenance and monitoring of the EC systems are required by the Declaration of Covenants and Restrictions.

ENGINEERING CONTROL – 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 annual inspections, which evaluate the integrity of the cover materials. These systems were fully in place and completely effective during the reporting period. A crack in the floor slab was identified in the vicinity of SSDS-3 during VII sampling conducted on January 4, 2022. This crack was repaired during monitoring well decommissioning activities in November 2022.

ENGINEERING CONTROL – 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 inches of water (in. H₂O) under the slab across each area to mitigate vapor intrusion. Each SSDS is designed to operate independently and continuously. Operation of the SSDS systems were verified by annual inspections, which monitor the vacuum field and blower operations. This system was turned off and use terminated during this reporting period with NYSDEC approval.

INSTITUTIONAL CONTROLS

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 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 annual 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.

During this reporting period, soil vapor and indoor air sampling indicated use of the SSDS was no longer necessary due to reduced VOC impacts in the subsurface. Use of the SSDS was discontinued with NYSDEC approval. AG Geology is updating the SMP is being updated to reflect the termination of the SSDS and will be submitting a revised SMP to the NYSDEC in October for approval.

6.0 VAPOR INTRUSION INVESTIGATION - 2022

On December 13, 2023, AG Geology conducted a VII in accordance with NYSDOH Soil Vapor Intrusion (SVI) Guidance, NYSDEC Department of Environmental Remediation (DER) – 13. Chloroform, n-hexane, and trichlorofluoromethane were detected in sub-slab vapor samples at concentrations above the lowest reference value; however, concentrations of these three compounds were either not detected or were below their respective reference values in all indoor and outdoor ambient air samples. There were no exceedances identified in any of the indoor air or outdoor ambient air samples. Sample locations are illustrated on **Figure 4**. Based on the results of the above investigations, AG Geology requested the use and annual inspections of the SSDSs be discontinued. Per NYSDEC approval, use of the SSDS has been terminated.

7.0 CONCLUSIONS AND RECOMMENDATIONS

During this 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. Overall, the cover systems remained intact and were effective in limiting exposure over the reporting period. Over the reporting period, the SSDS performed within its design specifications and achieved remedial objectives. The use of the SSDS is no longer required and its operation was terminated during this reporting period. ICs placed on the site have remained unchanged and nothing has occurred on-site that impairs the ability of the controls to protect human health or the environment over the reporting period. AG Geology is updating the SMP is being updated to reflect the termination of the SSDS and will be submitting a revised SMP to the NYSDEC in October for approval. AG Geology recommends with the removal of the SSDS from the site ECs, the frequency for submittal of the PRR be decreased to every three years.

If you have any questions regarding this submittal, please feel free to contact the undersigned at +1 518 859 4626 or at katie.angel@anteagroup.us.

Sincerely,



Katharine Angel, PE
Project Manager
+1 518 859 4626
katie.angel@anteagroup.us
AG Geology & Engineering, D.P.C.

FIGURES



300 150 0 150 300 ft
 Scale: One inch equals approximately three hundred feet

FIGURE 1 - SITE LOCATION MAP
 FORMER CHAMPION PRODUCTS FACILITY
 200 NORTH MAIN STREET
 PERRY, NEW YORK

PROJECT NO.: 160276080A
DATE: 8/12/2016
PREPARED BY: BR
DRAWN BY: LKO
REVIEWED BY: BR

**AG Geology &
 Engineering, D.P.C.**



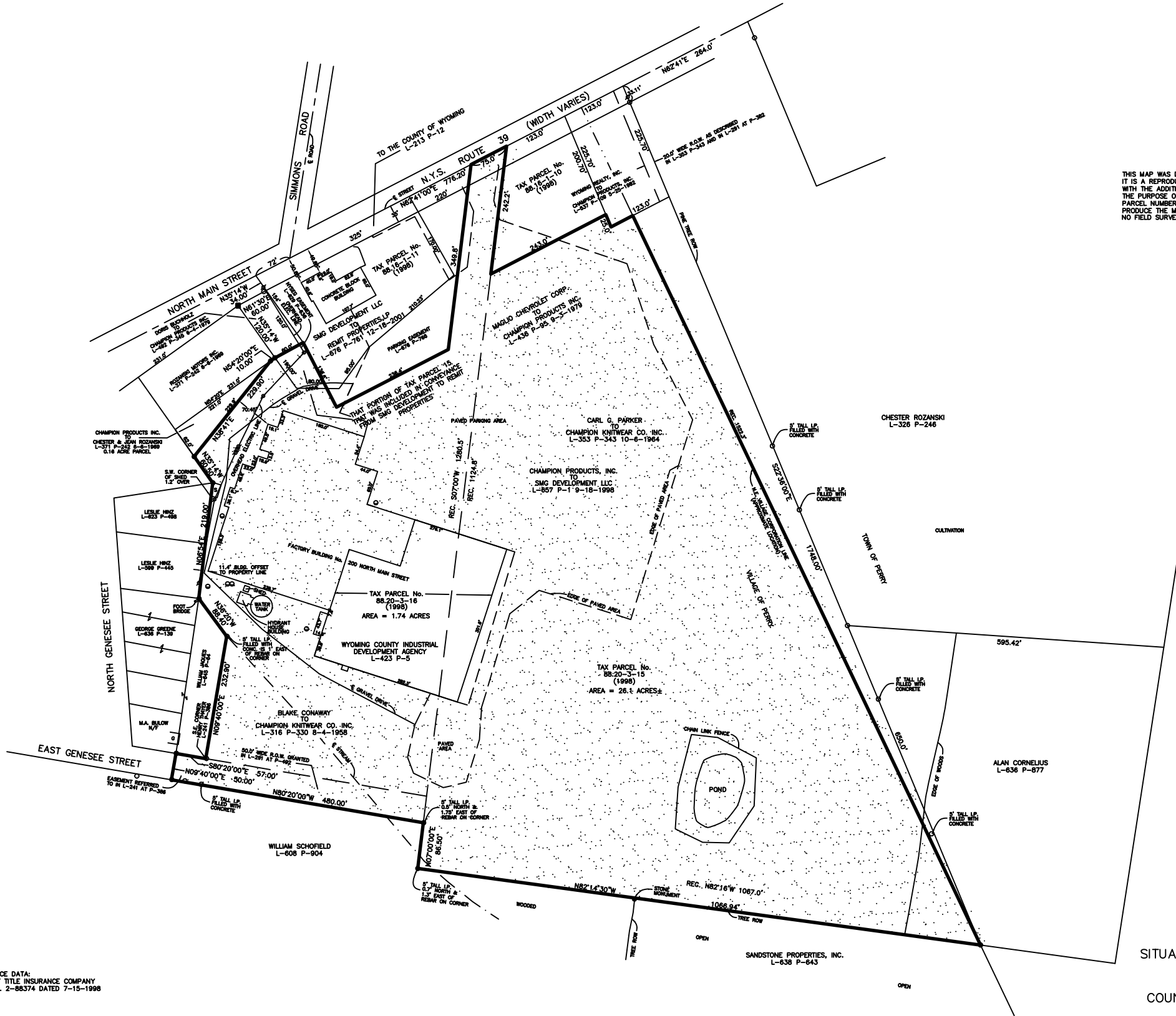
NOTE:
○ = MONITORING WELL

NOTE:
NEW IRON STAKES SHOWN THUS: (■)
EXISTING IRON STAKES SHOWN THUS: (○)

REFERENCE DATA:
STEWART TITLE INSURANCE COMPANY
TITLE No. 2-66374 DATED 7-15-1998

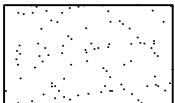
REVISED 9-15-1998

98-171-S
2012-36-S



THIS MAP WAS DRAWN 4-10-2012.
IT IS A REPRODUCTION OF GILLEN MAP 98-171-S
WITH THE ADDITION OF TAX PARCEL I.D. NUMBERS.
THE PURPOSE OF THIS MAP WAS TO IDENTIFY TAX
PARCEL NUMBERS THAT EXISTED IN 1998 AND TO
PRODUCE THE MAP IN DIGITAL/ELECTRONIC FORMAT.
NO FIELD SURVEYING WAS DONE ON 4-10-2012.

LEGEND



AREA DEFINED AS THE SITE

SURVEY MAP - LAND OF
CHAMPION PRODUCTS
SITUATE ON LOT 28, WM. SHEPARD'S SUBDIVISION
OF THE OGDEN TRACT
VILLAGE & TOWN OF PERRY
COUNTY OF WYOMING, STATE OF NEW YORK
JOHN F. GILLEN-LAND SURVEYOR NO. 49649
7 PERRY AVE., P.O. BOX 53 WARSAW N.Y.
(585)786-3960

225 112.5 0 112.5 225 ft
Scale: One inch equals approximately two hundred and twenty-five feet

FIGURE 2-SITE SURVEY MAP
FORMER CHAMPION PRODUCTS FACILITY
200 N. MAIN STREET
PERRY, NY

PROJECT NO.: 1107427P
DATE: 10/4/12
PREPARED BY: MJS
DRAWN BY: LKO
REVIEWED BY: MJS

anteagroup
5788 Widewaters Parkway
Syracuse, New York 13214

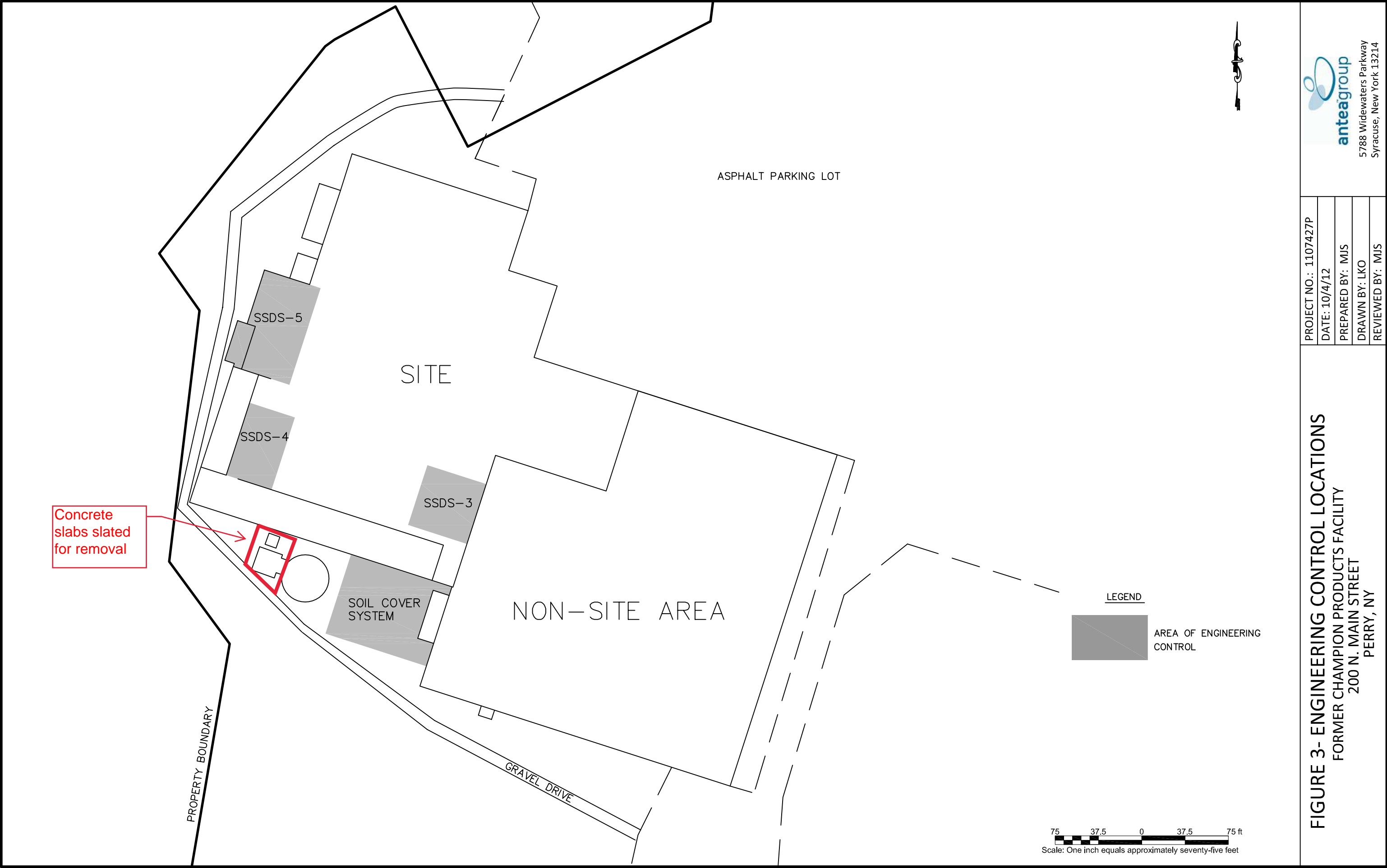
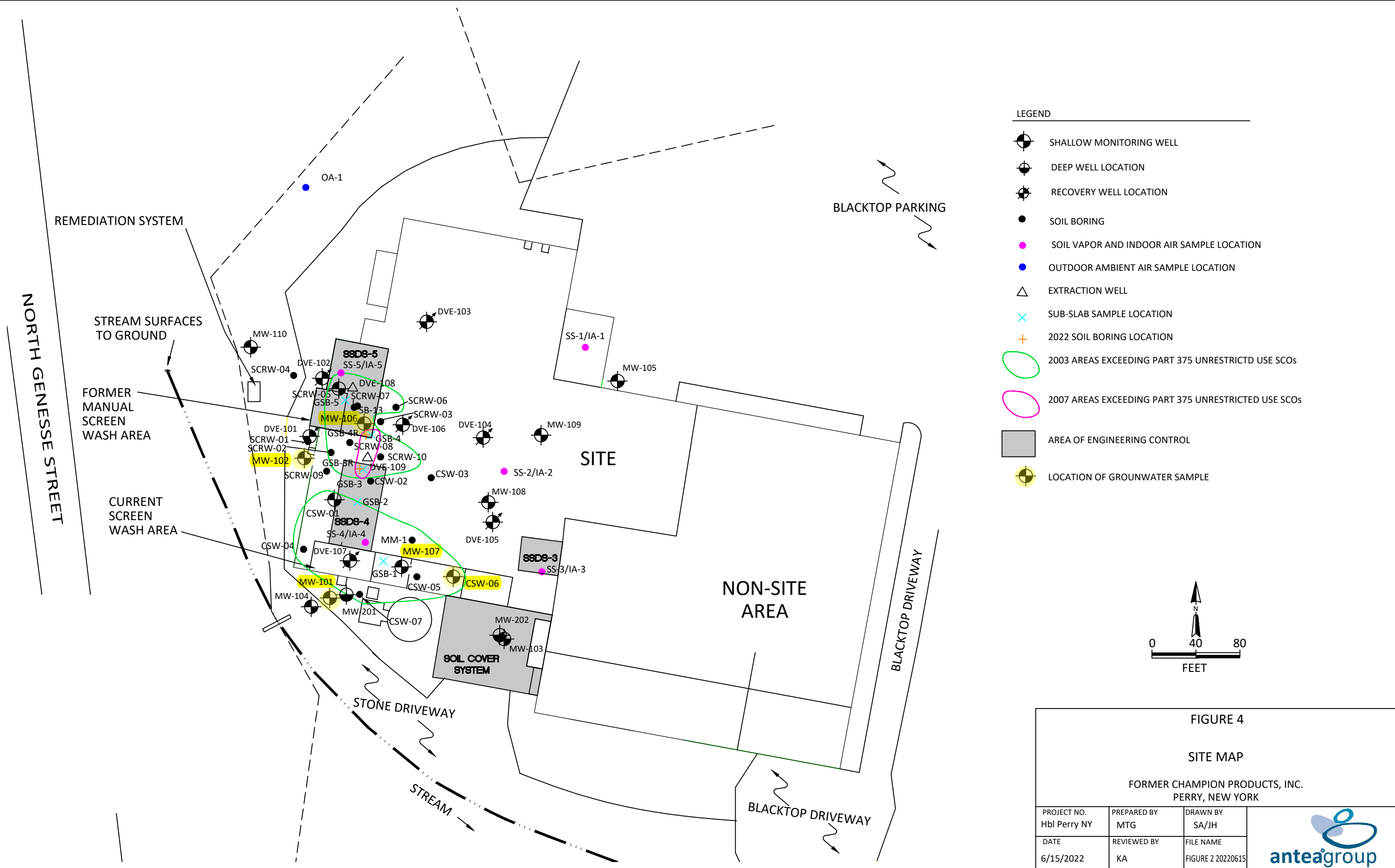


FIGURE 3- ENGINEERING CONTROL LOCATIONS
FORMER CHAMPION PRODUCTS FACILITY
200 N. MAIN STREET
PERRY, NY

PROJECT NO.: 1107427P
DATE: 10/4/12
PREPARED BY: MJS
DRAWN BY: LKO
REVIEWED BY: MJS



ATTACHMENT 1

CERTIFICATIONS



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. **V00189**

Site Name **Champion Products Company**

Site Address: 200 N. Main Street Zip Code: 14530
City/Town: Perry
County: Wyoming
Site Acreage: 26.000

Reporting Period: August 14, 2022 to August 14, 2023

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?
Commercial and Industrial

☒ ☐

7. Are all ICs 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

Description of Institutional ControlsParcelOwnerInstitutional Control**Portion of 88.20-3-16.1**

SMG Development, LLC

Ground Water Use Restriction
Building Use Restriction
O&M PlanSoil Management Plan
Site Management Plan
IC/EC Plan

Deed Restriction including:

- Prohibition of groundwater use without treatment
- Restriction of Use to Commercial or Industrial use (which Commercial or Industrial use shall not include childcare/day care facilities, hospitals, residential health care facilities, vegetable gardens, and farming.
- Adherence to approved Site Management Plan (SMP) which includes a IC/EC Plan, O & M Pan and a Soil Management Plan.
- Periodic Review Reporting

Description of Engineering ControlsParcelEngineering Control**Portion of 88.20-3-16.1**

Cover System

Soil Vapor Mitigation System. SSDSs approved for termination 5/15/2023

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 Engineering Control 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 complete.

YES NO

☒ ☐

2. For each Engineering control listed in Box 4, I certify by checking "YES" below that all of the following statements are true:

(a) The 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. 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.

I Katharine Angel at 445 Hamilton Ave, Suite 504, White Plains, NY 10601
print name print business address

am certifying as Remedial Party (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

9/13/2023

Date

EC CERTIFICATIONS

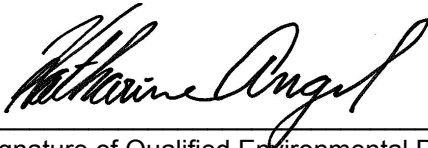
Box 7

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.

I Katharine Angel, PE at 445 Hamilton Ave, Suite 504, White Plains, NY 10601
print name print business address

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



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

Stamp
(Required for PE)

9/13/23

Date



ATTACHMENT 2
INSPECTION REPORTS

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

Quarter/Date: 4Q22 - 11/24/22
Weather: 37°F, cloudy
Personnel: Victor Allen

Location:	Area SS-5 / Former Remedial Area Western Building			Area SS-4 / Storage Southwest Building		Area SS-3 / Storage Southeast Building	
Pipe Branch:	A	B	C	D	E	F	G
Suction Pressure (" WC)	2.75	2.45	2.45	3.50	3.55	0	0
PVC Piping Intact (Y/N)	Y	Y	Y	Y	Y	Y	Y
Floor and PVC seals ok (Y/N)	Y	Y	Y	Y	Y	Y	Y
System Operating (Y/N)	Y			Y		N	
Overall Piping Run ok (Y/N)	Y			Y		Y	
Blower Functioning Correctly (Y/N)	Y			Y		Y	
Exterior casings intact (Y/N)	Y			Y		Y	

Comments/Notes:

* Inspection 1545-1630
 • Closed pipe valves after completing well abandonment
 • No suction pressure in Area SS-3.

Inspection
Former Champlon Products Facility
200 North Main Street, Perry, New York

Date: 8/17/23
Weather: 75°F, Cloudy
Inspector: Victor Allen
Site Contact: Adam Gulla

Former Empty Drum Storage Area	
Soil Cover Condition	Good
Erosion (Y/N)	No
Cover Breaches (Y/N)	No
Repairs Required (Y/N)	No

Annual Site Inspection

Any changes in Facility Operations: No

Any Site Usage Changes: No

Site Ownership Changes: No

Comments/Notes/Picture:

• SDS system - vents closed

• Area west of soil cover system to be demo (two concrete slabs) and restored
to vegetation to mow.

• Soil cover panel form to be installed off site by mid-2024

• (4) Poly drums on site [2 - Empty | 1 - Soil (<5%) | 1 - Purge water (~50%)]
No odor

• Re-paint entire outside of building

ATTACHMENT 3

Photo Log

Photo 1 – View
looking north at
soil cover system
area



Photo 2 – View
looking east at
cover soil system
area



Photo 3 –
View looking
west at cover
soil system area



Photo 4 – View
looking east at
concrete slabs to
be removed and
restored to
vegetation.

