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## FORMER SPERRY REMINGTON SITE (NYSDEC SITE I.D. #808043)

## REVISED INTERIM REMEDIAL MEASURE WORK PLAN

### CITY OF ELMIRA, CHEMUNG COUNTY, NY

Prepared for New York State Department of Environmental Conservation Division of Environmental Remediation, Region 8 6274 East Avon-Lima Road Avon, New York 14414-9519

Prepared by Geosyntec Consultants, Inc. and Its Affiliate Beech and Bonaparte Engineering, PC 10211 Wincopin Circle, 4<sup>th</sup> Floor Columbia, Maryland 21044

Project Number MN0832A Document Number MD19202

7 October 2019

#### NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

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#### <u>Via E-mail</u>

September 16, 2019

Mr. Kevin Krueger, PE Unisys Corporation Corporate Environmental Affairs 3199 Pilot Knob Road Eagan, MN 55121

Dear Mr. Krueger:

#### Re: Revised Interim Remedial Measures Work Plan Former Sperry Remington Site #808043 Elmira, Chemung County

The New York State Department of Environmental Conservation (NYSDEC) and the New York State Department of Health (NYSDOH) have completed the review of "Revised Interim Remedial Measure Work Plan" for the Former Sperry Remington Site #808043, dated 24 April 2014, last revised 28 June 2019, and approve contingent upon the following:

- 1. The means, methods, extent and confirmation of sewer cleaning is provided along with an updated schedule.
- 2. Documentation (not confirmation) samples are appropriately identified at all depths in limited excavations and layback soils.
- 3. Construction trailers are not placed in areas where potential exposure to PCBs exist.

Please provide the requested information and an updated work plan schedule within 20 days. Additionally, a copy of the work plan, this approval and the updated schedule must be placed in the document repository for the site before proceeding with work.

Sincerely,

Timothy Schneider, P.E. Professional Engineer 1

P. Brookner A. Krasnopoler B. Schilling



Department of Environmental Conservation M. Cruden H. Dudek D. Harrington D. Hettrick J. Deming

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Geosyntec<sup>></sup>

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#### **Certification**

I <u>Aron Krasnopoler</u> certify that I am currently a NYS registered professional engineer as defined in 6 NYCRR Part 375 and that this Interim Remedial Measures Work Plan dated 7 October 2019 was prepared in accordance with all applicable statutes and regulations and in substantial conformance with the DER Technical Guidance for Site Investigation and Remediation (DER-10).

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Aron Krasnopoler, P.E.



#### 1. INTRODUCTION

#### 1.1 Background

On behalf of Unisys Corporation (Unisys), Geosyntec Consultants, Inc. and its New York affiliate Beech and Bonaparte Engineering, P.C. (collectively Geosyntec) are submitting this Revised Interim Remedial Measure (IRM) Work Plan for the Former Sperry Remington Site (Site #808043) (Site) in Elmira, New York. In accordance with the Order on Consent and Administrative Settlement (AOC) (Index #B8-0815-09-10) with the New York State Department of Environmental Conservation (NYSDEC or agency) approved by NYSDEC on 30 March 2010, Unisys is conducting a Remedial Investigation (RI) to determine the nature and extent of constituents of concern (COCs) that may have discharged from the Site, determining if residual sources of COCs still exist, and identifying both current and potential routes of human exposure, if any, to COCs. The proposed IRM intends to address potential sources for migration of COCs from historic oil skimmer #2 (OS2) to the environment.

The Site is located at 1051 South Main Street in Elmira, Chemung County, New York (see **Figure 1**). The Site is a 185' x 65' rectangular area (0.28 acres) as shown on **Figure 2** that includes an eight to twelve (8 to 12) foot diameter covered concrete culvert (Site Culvert) and OS2. The Site Culvert extends from a former holding pond (immediately to the west and adjacent of the Site) to a discharge point to the east northeast and off-site. The Site Culvert discharges into a 580 feet long Drainage Swale, which subsequently drains into an approximate 3.5-acre Wetlands Area and Coldbrook Creek at two outfall locations (the Off-Site Areas). The Site Culvert is approximately 275 feet long and extends beneath a railroad line owned by Norfolk Southern. OS2 is a concrete rectangular structure measuring approximately sixteen (16) feet wide and forty-two (42) feet long and aligned parallel to the Site Culvert (**Figure 2**) with a shared wall. The Site and off-Site areas are currently owned by multiple parties. The 0.28-acre Site is currently owned by the Southern Tier Commerce Center (STCC). Elmira High School (EHS) is the adjacent property to the north. Samples collected in 2006 by NYSDEC indicated that there were polychlorinated biphenyls (PCBs) and inorganic constituents present in sediments in the Drainage Swale, Wetlands Area and Coldbrook Creek.

Phase 1 Remedial Investigation (RI) results were originally presented in the Remedial Investigation Phase 1 Data Report (Phase 1 Data Report) dated 18 November 2011. Information presented in the Phase 1 Data Report identified the Site Culvert, the OS2 structure, and their respective subsurface connections as potential sources of COCs in off-Site wetland sediments, and may warrant IRM implementation. In order to evaluate applicability and effectiveness of potential IRM alternatives Unisys conducted an IRM PDI at the Site in July 2012 to characterize hydraulic connections to OS2 and culvert structures. Based on those findings, Unisys proposed an IRM for closure of OS2 in place on 24 April 2014. In response to 23 June 2014 NYSDEC comments, Unisys proposed an IRM to clean but not close OS2 on 12 September 2014. NYSDEC provided further comments on the revised IRM Work Plan on 3 October 2014. A second revision to the

IRM Work Plan was submitted to NYSDEC on 6 November 2014. Copies of NYSDEC comments and Unisys' responses are provided in **Appendix A**. After discussion with NYSDEC on prioritization of multi-site activities, implementation of an OS2 IRM was delayed to accommodate completion of Site Characterization and IRM tasks at the Former Sperry Remington - North Portion (NYSDEC #c808022).

#### 1.2 <u>Report Organization</u>

The remainder of this report is organized into the following sections:

- Section 2 IRM Pre-Design Investigation Summary;
- Section 3 Scope of Work;
- Section 4 Quality Assurance
- Section 5 Permits and Temporary Controls;
- Section 6 Health and Safety;
- Section 7 Institutional Controls; and
- Section 8 Schedule and Deliverables.

#### 2. IRM PRE-DESIGN INVESTIGATION SUMMARY

#### 2.1 <u>Summary of Previous Investigations</u>

Potential hydraulic connections to OS2 and the Site Culvert, as well as connections between the two structures, and other potential sources were evaluated during the 2012 IRM PDI and Site Characterization of the Former Sperry Remington Site – North Portion (NYSDEC #c808022) located on the EHS property and the Former Scott Technologies Site (NYSDEC #808049) located on the STCC property. Findings of those investigations have been presented previously in the following reports:

- Remedial Investigation Phase 1 Data Report, Former Sperry Remington Site, 18 November 2011
- Revised Interim Remedial Measure Pre-Design Investigation Data Report, Former Sperry Remington Site, 19 February 2013;
- Site Characterization Data Report, Former Sperry Remington Site North Portion, 6 February 2015; and
- Site Characterization Data Report, Former Scott Technologies Site, 13 May 2016.

#### 2.1.2 OS2 Structure and Connections

Plan and cross-sectional depictions of OS2 are shown on **Figure 3**. The top of OS2 has been observed to be 12 to 36 inches below the ground surface. Observed inlet and outlet connections to OS2 include:

- A concrete-encased eighteen-inch (18-inch) pipe traverses the Site Culvert from the south and connects to OS2 in a manner that partially obstructs flow within the Site Culvert. The encased pipe is approximately eighty-eight (88) feet from the western end of the Site Culvert and is approximately three (3) feet tall by three (3) feet thick and was observed to be two-thirds (2/3) submerged in water inside the Site Culvert, approximately three (3) feet from the crown of the Site Culvert. The bottom of the Site Culvert drops several feet to bypass beneath the concrete encased pipe (see the Site Culvert profile in **Appendix B**);
- An approximate five-foot (5-ft) box culvert enters the bottom of OS2 at the eastern end;
- A twelve-inch (12-in) high by fifty-two-inch (52-in) wide rectangular opening is present on the north side of the Site Culvert approximately fifty-seven (57) feet from its western end opening directly to OS2. The rectangular opening is approximately three and onehalf (3.5) feet above the base of the Site Culvert and was observed to be approximately three (3) feet above the water line in the Site Culvert during the 2012 IRM PDI;

- Four (4) 12-in diameter pipes penetrate the south side of OS2 at the water line in the Site Culvert below the rectangular opening then turn downward below the observed water line inside OS2; and
- Two (2) three-inch (3-in) diameter steel connections on the north side approximately three (3) feet below the top of OS2.

#### 2.2 2017 Pre-Design Investigation

On 17 October 2017, Unisys submitted an IRM PDI Work Plan to collect data needed to evaluate IRM options and complete an IRM design. NYSDEC gave conditional approval on 23 October 2017. The objective of the IRM PDI was to determine whether inlets to OS2 are connected to active storm water infrastructure on the EHS and STCC properties. Field work for the 2017 IRM PDI was conducted between 6 and 17 November 2017. Geosyntec mobilized to the Site with Remedial Construction Services, L.P. (RECON) on 6 November 2017. RECON set up temporary fencing and cleared vegetation in preparation for PDI activities. PDI activities presented in the 2017 IRM PDI Work Plan including geophysical surveys, test pitting and in-line camera surveys are described in the following sections.

#### 2.2.1 Utility Clearance and Geophysical Survey

Prior to test pitting, vegetation was cleared in the southeast corner of the EHS property to provide access for other PDI activities. Ground Penetrating Radar Systems, LLC (GPRS) of Rochester, New York conducted a geophysical survey on 6 November 2017 to identify subsurface utilities and structures. Additional geophysical surveys were conducted near CB-6 and CB-10 (see **Figure 4**). Geophysical anomalies were identified in the vicinity of OS2 and former Oil Skimmer #1 (OS1) near the EHS basketball hoops in the rear parking lot. New York Leak Detection (NYLD) of Jamesville, New York conducted a utility survey on 9 November 2017 to determine the direction of a downstream connection from CB-6. Copies of geophysical survey reports provided are presented in **Appendix C**.

During vegetative clearing, a manhole ring was observed east of the EHS fence adjacent to an unfinished concrete slab. Hand digging around the manhole ring identifed a manhole cover underneath the manhole ring but no subsurface structure. A mini excavator was used to lift the concrete slab and a brick manhole structure (CB-15) was observed. The location of CB-15 is shown on **Figure 4**. Observations from the surface identified three connections to CB-15: to the north; east; and west with an approximate depth of 10.5 feet. Fine-grained material was observed in the bottom of the structure. Water was not observed in this structure. Pursuant to the PDI Work Plan, fine-grained material CB-15 was identified for sampling and completion of an in-line camera survey was specified.

#### 2.2.2 Test Pit and Trenching

A test pit & trenching program was conducted to identify potential subsurface structures connecting to OS2. This investigation took place in four (4) test pit zones on EHS and STCC properties: Test Pit 1 (TP-1), Test Pit 2 (TP-2), Test Pit 3 (TP-3), and Test Pit 4 (TP-4). Within each zone, one or more pits/trenches were excavated to locate connections and structures related to the former combined industrial sewer. Test pit locations are shown on **Figure 4**. A photoionization detector (PID) was used for testing head space in test pits, samples, and ambient air. PID readings did not exceed 0.3 ppm during this PDI program. Test pit investigation logs and photographs are provided in **Appendix D**. Composite samples of soil spoils were collected to characterize relevant test pits. Soil samples were submitted to the Test America analytical laboratory for analyses for PCBs, semi-volatile compounds (SVOCs), and metals in accordance with Quality Assurance Project Plan (QAPP). Copies of analytical reports are provided in **Appendix E**.

Upon completion, test pits were backfilled with a demarcation layer (i.e. geotextile), test pit spoils, a second demarcation layer, and one (1) to two (2) feet of #1 and #2 stone approved for import based on current land use. Fill thickness was two (2) feet on the EHS property and one (1) foot on the STCC property. Test pit spoils not used as backfill were contained in a roll-off container pending waste characterization.

#### 2.2.2.1 Test Pit TP-1

TP-1 was completed to investigate the extent of the 18-inch inlet to OS2 to the southeast. Several supplemental test pits were dug to investigate the gas line and horizontal extent of OS2 and Site Culvert. TP-1 test pit locations are shown on **Figure 4**. Test trench TP-1.1 was oriented from northeast to southwest on the southwest side of OS2. TP-1 measured 2.5 feet in width, 10 feet in length and was excavated to an approximate depth of eight (8) feet below ground surface (ft bgs). TP-1.1 lithology consisted of topsoil, underlain by dark gray fill dominated gravelly silt, orange mottled silty sand with gravel and underlying yellow-brown sandy silt with an abundance of yellow brick. No staining, odor, or elevated PID reading were noted during excavation. No structures were identified. One sample, TP1\_01\_11092017, was collected from TP-1.1 soil spoils.

#### 2.2.2.2 Test Pit TP-2

The purpose of TP-2 test pitting was to investigate potential connections between CB-15 and OS2, and the 5-ft box culvert as shown on **Figure 4**. One test trench (TP-2.1) was located southwest of CB-15 and the second (TP-2.2) was excavated above and extending out to the northeast and southeast edge of OS2.

TP-2.1 was oriented northwest to southeast, parallel to the EHS fence line. An eight-foot (8-foot) long by one-foot (1-foot) wide trench was excavated to depth of approximately nine (9) ft bgs at which an approximately six-foot (6-foot) wide culvert was identified as the connection between CB-15 and OS2. A second smaller pit (a continuation of TP-2.1) was dug approximately eight (8)

feet to the west (closer to OS2) to identify the concrete top of the 5-ft box culvert. The cement top was identified at approximately eight (8) ft bgs, verifying the depth and directional trend of the 5-ft culvert connection. Sample TP2\_01\_110817 was collected from TP-2.1 soil spoils. No staining, odor, or high PID readings were observed during excavation.

TP-2.2 was initiated to further examine potential connections to OS2 from the east. TP2.2 approximate dimensions were twenty (20) feet long and eleven (11) feet wide and a depth of approximately eight (8) feet. TP-2.2 was an irregular polygonal shape composed of a series of excavated trenches to investigate the northern and southern edges of OS2, the OS2 manhole, and the 5-ft box culvert headed northeast. TP-2.2 also investigated soils directly above OS2 with excavations to a depth of 2.5 ft. TP-2.2 pit was dug to identify the connecting former industrial sewer lines to OS2 between 4 and 8 ft bgs. The 5-ft box culvert was located at approximately eight (8) ft from the northeast corner of OS2. This observation confirmed the connection between CB-15 and OS2. The concrete ceiling of the 5-ft box culvert was observed approximately six and a half (6 ½) ft bgs, the two edges of the 5-ft box culvert were excavated to 8 ft bgs (but the base was not observed). No staining, odor, or high PID readings were observed during excavation, one sample TP2\_02\_110817 was collected to characterizes the soil spoils from TP-2.2.

#### 2.2.2.3 Test Pit TP-3

The purpose of TP-3 test pitting was to investigate structures previously observed in prior camera surveys downstream of CB-6, to the south and east. Test pit locations are shown on **Figure 4**.

TP-3.1 was located in a grassy area on the north end of the parking lot, southeast of the gas line and trending northeast-southwest across the parking lot. TP-3.1 reached dimensions of two (2) feet long, ten (10) feet wide, and eleven (11) feet deep. Sample TP3\_01111017 characterized the soil spoils of TP-3.1. No structures were observed during TP-3 excavation.

A second test pit (TP-3.2) was located further northwest, closer to CB-6, at the location where the previous camera survey showed a sewer line take a sharp right turn. TP-3.2 was excavated with approximate dimensions of two (2) feet long, ten (10) feet wide, and nine (9) deep. Similar to TP-3-1, no structures were encountered.

Both TP-3.1 and TP-3.2 contained soil of similar color and composition, the soil color alternated between yellow-brown to dark brown and ranged in composition from silty sand with gravel to silty gravel with coarse sand. No staining, odor, or high PID readings were detected in either excavation, one sample TP03\_01111017 was collected to characterizes the soil spoils from TP-3.1. Because of the similarities in soil profile and proximity of TP-3.1 and TP-3.2 a second sample from TP-3.2 was not collected.

#### 2.2.2.4 Test Pit TP-4

The purpose of TP-4 test pitting was to investigate potential connections and structures between CB-15 and CB-6. Test pit locations are shown on **Figure 4**. TP-4 test pits were also excavated to identify the location and depth of the gas line located along the EHS fence line and to identify a

subsurface anomaly observed during the geophysical survey. The subsurface anamoly coincided with a manhole shown on some historic maps but no manhole was encountered.

TP 4.1 was excavated north-west of CB-15, perpendicular to the EHS fence line to locate the pipe connection to CB-15. TP 4.1 trended northeast to southwest with approximate dimensions of eleven (11) feet long, two (2) feet wide and 11.5 feet deep. At approximately 11.5 ft bgs, at the excavator's depth limit, a solid structure was encountered. While not necessary for IRM planning and design, it is unknown if the structure connects to CB-15. Sample TP04\_01\_111317 characterizes the soil spoils removed from TP-4.1.

Test Pit 4.2 was excavated to the southwest of TP-4.1 to identify the location of a connection to the 5-ft culvert connecting to OS2 approximately ten (10) feet west from CB-15 (see Section 2.2.3). TP-4.2 was excavated with approximate dimensions of eleven (11) feet long, two (2) feet wide, and 11.5 feet deep. Sample TP4\_02\_111717 was collected from soil spoils characterizing the upper 10 ft. Hydrocarbon odors and dark staining were observed at an approximate depth of eleven (11) ft bgs. Sample TP4\_03\_111717 was collected to characterize this area of TP-4.2. No structure was observed.

#### 2.2.3 Former Combined Industrial Sewer Inspection

The extent of the current and former combined stormwater and piping infrastructure was investigated for possible connections to OS2. A plan view and profiles of the storm sewers investigated using inline camera surveys are shown on **Figure 5**. Inspections were conducted by Kandey Company (Kandey) of West Seneca, New York. Video and photographs for each survey run are included for reference in **Appendix F**. General findings from in-line camera surveys are summarized as follows:

• Kandey conducted a confined space entry of CB-15 to collect samples of fine-grained material for laboratory analyses for PCBs, SVOCs and metals. First, sample CB-15\_01\_111617 was collected from the upper two (2) inches of fine-grained material in CB-15. After that sample was collected, Kandey attempted to locate the bottom of CB-15. No hard bottom was encountered to a depth of approximately ten (10) inches at which stained soil with a strong hydrocarbon odor was observed. Sample CB-15\_02\_111617 was collected from across the depth of fine-grained material, i.e. between two (2) and ten (10) inches, to characterize stained soil.

During the confined space entry, connections to CB-15 were visually inspected. A connection to the east toward the railroad tracks was observed to have been plugged with concrete. A connection to the northwest was constructed of clay tile and appeared to run parallel to the EHS property line. A connection to the southwest appeared to connect to OS2. A brick arch and 30-inch brick sewer line was observed (see photograph included in **Appendix F**) on the right side of this connection approximately ten (10) feet from CB-15.

• A thirty-six-inch (36-in) sewer line was surveyed from CB-15 to the northwest. The line constructed of rectangular ceramic titles contained wet debris with wood and standing

water. Roots and mud caked the walls of the tunnel indicating that at one time the line was filled to at least 60% of the line capacity. At a distance of approximately of 245 ft, drier conditions were observed. At a distance of approximately 395 ft, a white two-inch (2-in) polyvinyl chloride (PVC) pipe was observed pushed through the side of the line breaking through tiles. Accumulated sand blocked further passage and the survey was abandoned.

- The 36-inch brick sewer line was surveyed from the 5-ft box culvert toward the northwest beginning approximately ten (10) feet southwest of CB-15. The line contained abundant roots, entering through the edges of the brick, abundant fine-grained material, cobbles, wood, and standing water. The survey continued straight for approximately fifty (50) feet until accumulated sludge prevented further progress and the survey was abandoned. The line continued straight as far as the camera could see.
- The 5-ft box culvert connecting CB-15 to OS2 was surveyed to the southwest from CB-15. The culvert was wet with abundant fine-grained material, cobbles, wood, and standing water. The concrete culvert appears to be constructed of concrete segments. The survey extended a distance of approximately thirty-nine (39) ft until accumulated sludge prevented further progress and the survey was abandoned. The internal baffles at the northeast inlet to OS2 were observed. The connection to OS2 was confirmed by observation of an object that had been lowered through the OS2 manhole.
- The camera was lowered through the manhole above the northeast side of OS2 to approximately a third of the depth of the manhole to observe connections from within OS2. OS2 was observed to contain some standing water and fine-grained material. The 18-in inlet in the southeast corner was observed to be half covered by water. A square cement culvert was observed at the base of the eastern wall, trending northeast toward CB-15. In the southwest corner, the faint outline of the four (4) pipes discharging to the Site Culvert and higher rectangular opening connecting were observed. On the northwest wall, two smaller pipes were observed to penetrate OS2. These observations were consistent with those from previous investigations.
- The 36-inch circular brick pipe heading southeast from CB-6 was re-surveyed. The direction of stormwater flow is assumed to be to the southeast. Standing water, wood debris, rocks, and fine-grained material were observed in the line, making survey progress difficult. At a distance of approximately twenty-six (26) feet, two (2) connections are observed within a subsurface structure. The connection on the left (east) is sealed with brick and is not considered active. The connection to the right (west) continued straight. At a distance of approximately thirty-nine (39) feet from CB-6, the line transitions from brick to concrete and takes a right turn (between 30 and 80 degrees) to the southwest. At a linear distance of approximately forty-six (46) feet from CB-6, the line turns back to the left (east) at about the same angle as the previous turn. A structural fracture in the line was observed at 10-12 o'clock within eight (8) inches of the joint at a distance of approximately fifty (50) feet. At a distance of approximately sixty-seven (67) feet, the line again turns left (45 to 80 degrees) to the south and transitions to a clay tile built line. The survey ended at

a linear distance of approximately eighty (80) feet at where approximately seventy-five 75 percent (75 %) of the connection was blocked by fine-grained material, wood, and rock. The survey of this connection was consistent with those from previous investigations while providing additional information regarding the condition of the western branch.

The connection heading northeast from CB-10 was re-surveyed in attempt to survey the entire line. The direction of stormwater flow is assumed to be to the north, northeast. The connection leaving CB-10 heading north is estimated to be approximately twenty-four (24) inches in diameter and constructed of hollow clay sections. The line started out relatively dry but contained coarse gravel and brick lining the bottom of the structure. At a distance of approximately twenty-five (25) feet from CB-10 the line bended slightly to the right (east) and appeared to slope downward. The line turned slightly to the left (northeast) continuing to slope downward at a distance of approximately sixty (60) feet. Standing water was observed beginning at a distance of approximately seventy (70) feet. The water level increased with distance until coarse debris was no longer visible at a distance of approximately one hundred fifteen (115) feet. At a distance of approximately one hundred (135) feet, a brick structure was observed. The line continued to ninety degrees (90°) to the left (north) with concrete construction. The water level was observed to increase with a depth reaching roughly the mid-section of the pipe. An opening to another structure was observed at a distance of approximately one hundred fifty-seven (157) feet and the survey was ended. Based on distance and location, that structure is considered to be OS2. The survey of this connection was consistent with those from previous investigations.

#### 2.2.4 Post-Investigation Survey

A post-investigation location survey was conducted by a licensed New York State surveyor of the test pits and identified subsurface structures. In addition, the location and invert elevations of CB-10, CB-11 and CB-2 were surveyed to support potential storm sewer modification as part of the IRM. A copy of the survey report is presented in **Appendix G**.

#### 2.2.5 Data Usability

Analytical data packages generated by the fixed laboratory, TestAmerica, during IRM PDI activities presented herein are included in **Appendix E** and were validated by Geosyntec. Analytical data packages were reviewed for completeness, field and laboratory quality control (QC) sample results were evaluated, significant laboratory control problems were assessed, and data qualifiers were assigned. Data validation was performed on analytical data generated to verify and validate the usability of those data. Verification and validation were based on completeness and compliance checks of sample receipt conditions, both sample-related and instrument-related QC results, recalculation checks, and review of actual instrument outputs. Data validation reports, delivered on 19 December 2017, are included in **Appendix E** and indicate qualification of data based on sample-related QC results. All data were found to be suitable for their intended use, except as noted in the validation reports.

#### 2.2.6 IDM Management

A composite sample was collected of solid investigation-derived material (IDM) contained in the roll-off container was collected for waste characterization. Samples were submitted for toxic characteristic leaching procedure (TCLP) analyses for metals, SVOCs, and VOCs and for analyses for PCBs. The analytical report is presented in **Appendix E**. Detections of PCBs and TCLP metals did not exceed hazardous waste characteristics for toxicity. The roll-off container will be transported off-Site for disposal as non-hazardous waste.

#### 2.3 <u>2018 Pre-Design Investigation – Amendment 1</u>

On 30 March 2018, Unisys submitted Amendment #1 to the 2017 IRM PDI Work Plan for predelineation of soils surrounding OS2 for excavation as part of the IRM. NYSDEC gave conditional approval on 5 April 2017 and a revised Amendment #1 was submitted on 13 April 2018. Field work for Amendment #1 was conducted between 20 and 27 April 2018. Eleven (11) soil boring were advanced on STCC property a as part of the OS IRM PDI. Boring logs are presented in **Appendix H**. Soil samples were collected and submitted to the fixed laboratory for analyses for PCBs and metals in accordance with the relevant PDI work plans. Analytical reports are presented in **Appendix E**. Data validation reports, delivered on 30 May 2018, are included in **Appendix E** and indicate qualification of data based on sample-related QC results. All data were found to be suitable for their intended use, except as noted in the validation reports.

#### 2.4 <u>Findings</u>

The current understanding of connections between OS2 and the former industrial sewer on the STCC and EHS properties is shown on **Figure 5**. In summary, the following is concluded regarding the status of OS2 and the former industrial sewer:

- The connection between CB-10 and OS2 is part of the active storm water infrastructure on the STCC property;
- Former industrial sewer connections on EHS property from CB-6 and CB-15 are not inactive;
- The discharge from OS2 to the Site Culvert will be active when water levels in OS2 are above the level of the discharge pipes; and
- A direct connection between the former industrial sewer on EHS property to the Site Culvert could not be confirmed during this phase of investigation. Observed obstructions have limited the extent of the camera survey and may restrict stormwater flow from upgradient reaches of the former industrial sewer. Additional work will be necessary to visually confirm the extent, condition and chemical quality of the sewer contents.

Detailed findings from the 2017-18 IRM PDI and previous investigations are:

- The concrete-encased 18-in clay pipe that enters OS2 from the southeast is connected to CB-10. This connection was observed to be dry during the 2012 IRM PDI. During Site Characterization of the Former Scott Technologies Site, CB-10 was observed to be connected to a subsurface structure at a distance of approximately one hundred thirty-two (132) feet northeast of CB-10 at which point the 18-in pipe turned toward the north and was of concrete construction. Water was observed at the base of the structure and in the pipe as it continued to the north, but no rocks or fine-grained material were noted. The pipe continued a further distance of approximately twenty-three (23) feet at which point an opening to a larger structure was observed. That larger structure was observed through the opening to contain water and was identified as OS2. Observations from within OS2 of a connection partially covered with water are consistent with that observation. Brick was observed in TP-1.1 at a depth of eight (8) ft bgs but no subsurface structure was encountered. It is likely that a structure is present at deeper depths. Previous investigations of the Site Culvert indicate that the concrete-encased pipe crosses the base of the Site Culvert. CB-10 is connected to upstream sewer connections through CB-11. Therefore, the connection between CB-10 and OS2 is part of the active storm water infrastructure on the STCC property.
- A piping connection to the south southeast of CB-6 was observed to branch approximately twenty-six (26) feet downstream of CB-6 and observed to contain standing water and accumulated sludges. The eastern (left) branch is closed off with a brick bulkhead (i.e., a wall built to block flow). The western (right) branch continues for a linear distance of approximately sixty-four (64) feet until it becomes approximately seventy-five percent (75 %) blocked by heavy sludge. The line turns right at thirty-nine (39) feet with at transition to concrete then left at forty-six (46) feet and right at sixty-seven (67) feet with a transition to clay tile. The turns may be related to the bypass of an obsolete oil former oil skimmer, considered to be OS1, reported in a letter from Remington Rand to the Chemung County Health Department dated 15 August 1966. IRM PDI test pitting in the vicinity of the presumed location of OS1 confirmed its location in 2012. Observations made during test pitting along the exterior of that structure did not identify outlet pipes or demonstrate characteristics of non-native material and were, therefore, not sampled. No active connections from former OS1 to OS2 or the Site Culvert were identified. Former OS1 has been determined not to be a potential active source of COCs to OS2 or the Site Culvert. No evidence of pipe collapse or structural compromise. Structurally sound pipe continues to the southeast beyond the sludge obstruction. .
- A clay tile pipe connection connecting to CB-15 from the northwest extends approximately 395 feet. It was observed that this pipe had standing water and accumulated sludge in about ten 10 to twenty 20 percent (10-20%) of the pipe. Penetration by a two-inch PVC pipe and accumulated sand prevented further investigation at 395 ft. The structural compromise to the edge of the pipe at 395 ft is assumed to be piezometer MW-8 sand pack which obstructed further camera survey and flow. The location is consistent with a former

industrial sewer line along the eastern EHS property boundary shown on historic maps. The structurally sound pipe continues to the north beyond the observed obstruction.

- CB-15 was found to be a multi chambered poured concrete structure having an open bottom and found to have standing water and debris. The eastern chamber was identified as a concrete bulkhead and the western chamber extends to the five (5) foot box culvert connecting to OS-2. A thirty-six-inch (36-inch) clay tile lined pipe empties into the main chamber and a thirty-inch (30-inch) diameter brick lined pipe empties into the west chamber.
- The 5-ft box culvert that enters OS2 from the northeast is connected to CB-15 to the northeast. The culvert was wet with abundant fine-grained material, cobbles, wood, and standing water. A thirty-six-inch (36-inch) brick line connects to the culvert at a distance approximately ten (10) feet southwest of CB-15. The line contained abundant roots, entering through the edges of the brick, abundant fine-grained material, cobbles, wood, and standing water. While the camera survey was abandoned at distance of approximately fifty (50) feet, the line appeared clear further on. The direction of the line appears to be toward CB-6. Test pitting to a depth of eleven (11) feet did not encounter the connection to the 5-ft culvert. Partial blockages in the thirty (30) and thirty-six (36) inch diameter pipes appears to restrict flow from CB-6 and other points north. Additional investigation is needed to confirm the extent of the thirty-six-inch (36-inch) pipe system and connection of the thirty inch (30-inch) system between CB-6 and the west chamber of CB-15. Additionally, excavation along the north side of OS-2 confirmed steel pipe connections have been removed.
- The two (2) steel pipe connections on the north side of OS2 previously associated with historical Site operations rather than storm water infrastructure have been removed.
- The four (4) 12-in diameter pipes on the south side of OS2 appear to be discharge pipes from OS2 to the Site Culvert. Observations of the Site Culvert during previous investigations indicate that the pipes discharge at the base of the Site Culvert. The observed water level in OS2 was below the discharge. This outlet connection from OS2 is considered to be active if the water level in OS2 rises to that of the discharge.
- An 18-in clay pipe connects to the Site Culvert on the north side approximately 180 feet from the western end of the Site Culvert. Historic drawings depict the 18-in clay pipe connecting CB-15 to the Site Culvert. No flow was observed entering the Site Culvert from this line during the 2012 IRM PDI. No connections to the Site Culvert were observed from CB-15 during the 2017 IRM PDI. A connection to the east from CB-15 was plugged with concrete and may have previously connected to the 18-in clay pipe and the Site Culvert as an overflow bypass of OS2. The former industrial sewer lines on EHS property do not appear to have a currently active direct connection to the Site Culvert.

- The Site Culvert remains an active part of the Site storm water sewer system receiving flows from both the STCC and EHS properties, as well as from the City of Elmira captured along South Main Street. On the EHS property, storm water from the north and combined storm water and cooling water discharge from the west combine at catch basin CB-5 and discharge to the Site Culvert. On the STCC property, storm water from the south of Building 88 and from South Main Street flow through the 5-ft RCP connecting to catch basin CB-2 and the Site Culvert. A plan view and profile of the Site Culvert, as previously presented in the Phase 1 Data Report, are included in **Appendix B**.
- Soils around the perimeter of OS2 have been sampled from test pits spoils during previous investigations. Additional samples were collected from test pit spoils in 2017. Table 1 presents a summary of the test pit analytical results from the Site. COC concentrations in soil at depths above two (2) feet bgs are compared to Industrial Soil Cleanup Objectives (SCOs) presented in 6 NYCRR Subpart 375. Total PCB concentrations are also compared to the limit of fifty (50) mg/kg for PCB remediation wastes as defined in 40 CFR §761.3 Toxic Substances Control Act (TSCA). TSCA limits are considered in PCB delineation for identification of those soils that may be classified as hazardous waste containing PCBs as defined in 6 NYCRR Part 371.4 (e). Sample locations are shown on Figure 5.
  - Soils from TP-4 and OS-SB-01 on the north side of OS2 had detections of total PCBs above the Industrial SCO of 25 mg/kg, but total PCB concentrations did not exceed TSCA limits. Detections of metals and SVOCs did not exceed Industrial SCOs.
  - Soils from TP-02-02 on the east side of OS2 above the 5-ft box culvert had detections of total PCBs and arsenic above the Industrial SCO and detections of total PCBs above TSCA limits. Soils from TP-3 north of the 5-ft box culvert had detections of arsenic above the Industrial SCO of sixteen (16) mg/kg but detection of total PCBs were less than one (1) mg/kg.
  - Soils from TP-2 and OS-SB-02 on the west side of OS2 had detections of total PCBs below the Industrial SCO but TP-2 had detections of arsenic above the Industrial SCO.
  - Soils from TP-1 and TP-01-01 on the south side of OS2 had detections of total PCBs below the Industrial SCO but detections of arsenic were above the Industrial SCO.
  - Previous sampling of soils adjacent to OS2 for waste characterization did not indicate characteristics of hazardous waste.
- Soil borings were advanced for soil sample collection during the OS2 IRM and IRM #2 PDIs as well as previous investigations. Summaries of PCB analytical results for the STCC

for shallow subsurface soils, i.e. to a depth of two (2) ft bgs are presented on **Table 2** and on **Figure 6** and **7**. Total PCB concentrations are compared the restricted use SCO for the current land use, i.e., the Industrial SCO, as well as TSCA limits. Summaries of metal analytical results are presented in **Table 3** and **Figures 8** and **9**.

- Total PCBs were detected in shallow subsurface soils above the Industrial SCO and TSCA limits east of OS2 on the STCC property. Total PCB detections in shallow subsurface soils northwest of OS2 exceeded the Industrial SCO only.
- Arsenic was detected in shallow subsurface soils above the Industrial SCO of sixteen (16) mg/kg on the STCC property.
- Detections of total PCBs in deeper subsurface soils (i.e. below 2 ft bgs) on the STCC property were below the Industrial SCO of twenty-five (25) mg/kg as shown on **Table 4** and **Figures 10** to **15**.
- Detections of arsenic in deeper subsurface soils (i.e. below 2 ft bgs) on the STCC property were above the Industrial SCO of sixteen (25) mg/kg as shown on **Table 4** and **Figures 16** to **19**.
- Samples of fine-grained material were collected from catch basins closest to OS2 on the EHS and STCC properties on 28 May 2015. A fine-grained sample was collected from CB-15 on 16 November 2017. COCs detected included PCBs, metals, and SVOCs as summarized on **Table 5** and compared to NYSDEC Class C sediment guideline values (SGVs) and TSCA limits for total PCB.

#### 2.5 Proposed IRM

Unisys has identified that fine-grained material within OS2 contains concentrations of total PCBs that exceed New York State hazardous waste disposal criteria. Inlets to OS2 are connected to the former industrial sewer on EHS and STCC properties. On the EHS property, the former industrial sewer is not part of the active storm sewer system through connections to CB-6 and CB-15. On the STCC property, the former industrial sewer is part of the active storm sewer system on the STCC property through connections to CB-10. Total PCBs and metals have been detected above restricted use SCOS for total PCBs and metals in shallow subsurface soils on the STCC property. Total PCBs have also been detected above TSCA limits in shallow subsurface soils on the STCC property.

A non-emergency IRM at OS2 is applicable to mitigate potential environmental or human exposures before the completion of the RI by removing OS2 and shallow subsurface soils north of the Site Culvert and on the EHS property. Removal of OS2 will require a bypass of CB-10 and connecting CB-11 to the Site Culvert to maintain storm water management on the STCC property. Open grates at inactive storm sewer connections on the EHS property will be replaced with solid

covers. The proposed IRM will include 1) installation of new storm water infrastructure; 2) excavation of soils surrounding OS2; 3) excavation to expose and remove the top of OS2; 4) removal of water and fine-grained material from within OS2; 5) stabilization of fine-and off-Site disposal; 6) cleaning of OS2 interior surfaces; 7) removal of OS2; 8) backfilling; and 6) site restoration. COCs that may be present in fine-grained material in upstream structures to OS2 will be addressed as future IRMs or as part of the final remedy for the Site.

Detections of total PCBs and metals in soils above restricted use SCOs as well as detections of total PCBs above TSCA limits on the EHS property have not been completely delineated and will be addressed as part of the Brownfields Cleanup Program (BCP) Remedial Investigation (RI) to be conducted at for the Former Sperry Remington Site – North Portion (#c808022) in 2019.

#### 3. SCOPE OF WORK

This IRM Work Plan presents a scope of work to remove COC-impacted water and fine-grained material from OS2. The IRM Work Plan also addresses temporary construction facilities, controls, health and safety, and confirmation sampling in accordance with NYSDEC *Technical Guidance for Site Investigation and Remediation* (DER-10). Construction drawings are presented in **Appendix I.** 

#### 3.1 <u>Storm Water Piping Modifications</u>

#### 3.1.1 STCC Property

Based on data collected during previous investigations, the 18-in inlet to OS2 connects to CB-10 by way of the concrete-encased pipe. CB-10 is considered part of the active STCC storm water sewer system with upstream connections to catch basin CB-11 and other catch basins east and north of Building 87. Removal of OS2 will require decommissioning of CB-10 and its connection to OS2 and installation of a new storm water connection between CB-11 and the 5-ft RCP in order to maintain storm water flows on the STCC property. Storm water flow will be redirected at a location just prior to reaching CB-10 to the 5-ft RCP so that the storm water system will not be disrupted by the proposed IRM.

CB-10 and its connections to OS2 will be decommissioned as part of OS2 removal (Section 3.4). Fine-grained material will be flushed in sections from upgradient drainage infrastructure, starting at the most upstream catch basins (STI-CB7 and CB-14; see Figure 5) and including CB-11, prior to the installation of new infrastructure for storm water flow redirection. Water and entrained solids will be collected at the next downstream catch basin and staged in a water management area for later off-Site disposal. In-line camera survey will be used to verify that fine-grained material has been removed. If more than *de minimis* quantities of fine-grained material are observed, the section of upstream storm sewer will be re-cleaned and re-inspected.

Two (2) new storm water structures will be installed to connect the thirty-six inch (36-in) vitreous clay pipe (VCP) from CB-11 to the 60-in RCP. A new six-foot (6-ft) diameter manhole will be installed in line with the 36-in VCP from CB-11 and a new eight-foot (8-ft) diameter manhole will be installed in line with the 60-in RCP. The new structures will be connected by a new 36-in RCP at an invert elevation that will maintain storm water flow from CB-11 to the 60-in RCP. During storm water piping modifications, storm water flows from CB-2 and CB-11 will be diverted to holding pond.

Plans for the installation of new storm water structures are presented on the construction drawings included as **Appendix I**. Written approval from STCC of the proposed storm water infrastructure modifications are included in **Appendix J**.

#### 3.1.2 EHS Property

Based on inspections of the former combined industrial sewer on the EHS property conducted during Site Characterization of the Former Sperry Remington Site – North Portion, three (3) open grate catch basins are connected to a former industrial sewer line located along the eastern side of the EHS property that connects to the 5-ft box culvert inlet to OS2 (see Sheet 8 of the Construction Drawings). Inline camera inspections have shown this line to be collapsed or filled with finegrained material and has been shown to have a limited extent of storm water collection and obstructed flow to OS2. Two (2) catch basins, SSHS-CB1 and SSHS-CB2 are located in the grassy area east of the EHS gymnasium and capture surface drainage. The third catch basin, CB-6 (or SSHS-CB3), located southwest of the EHS K Wing, is not needed to capture surface drainage from the driveway in that area. Surface flow is to the south toward the swale located between the EHS parking lot and the STCC property. Therefore, these open grates will be replaced with closed tops to prevent surface flow from entering these catch basins. The area of east of the gymnasium will be regraded so that surface drainage is directed toward the property line. During previous discussions, NYSDEC and ECSD supported this approach with the understanding that fine-grained material in the former combined industrial sewer line will be addressed during future remedial actions. Written approval from ECSD of the proposed storm water infrastructure modifications are included in Appendix J.

#### 3.2 Excavation of Shallow Subsurface Soils

Shallow subsurface soils will be removed to a depth of two (2) ft bgs to address exceedances of industrial use SCOs for total PCBs and metals between the Site Culvert and the property line to the north as shown on **Figure 20**. IRM #2 for the Former Sperry Remington Site – North Portion was completed on the EHS property in August 2018 and removed PCB-impacted soils in the vicinity of the EHS rear parking lot. The western limit will be the fence around the holding pond which limits access to that area. The cleanup goals for the shallow subsurface soil removal to a depth of 2 ft bgs will be:

- 25 mg/kg total PCBs (Industrial SCO); and
- 16 mg/kg arsenic (Industrial SCO).

Confirmation sampling of excavation side walls and bottom areas will be conducted as follows in accordance with Section 5.4 (b) of DER-10:

- one sample from the bottom of each sidewall for every thirty (30) linear feet of sidewall; and
- one sample from the excavation bottom for every nine hundred (900) square feet of bottom area.

Confirmation sample locations are shown on **Figure 20** and on the Construction Drawings. Confirmation samples will be submitted to the fixed laboratory for analyses for PCBs and metals in accordance with Quality Assurance Project Plan (QAPP).

Upon excavation, excavated soils will be managed in two (2) categories:

- Soils with total PCB concentrations less than fifty (50) mg/kg will be stockpiled in the non-hazardous soil stockpile for waste characterization and transport and off-Site disposal; and
- Soils with total PCB concentrations greater than or equal to fifty (50) mg/kg will be accumulated in a TSCA stockpile prior to loading for off-Site transport and disposal as hazardous waste.

No active utilities will be permanently abandoned as part of IRM construction. During excavation, natural gas utilities may be exposed at depths between two and three ft bgs. Private utility location and vacuum excavation will be used to locate those utilities prior to excavation. The natural gas line along the eastern property line will remain in service during construction but will not require support given shallow depth of excavation. The natural gas line that serves STCC may be impacted by deeper excavation as part of OS2 removal (Section 3.4) and will be relocated prior to construction in coordination with STCC and NYSEG. Based on discussions with NYSEG, a deactivated natural gas service for the STCC building is available from South Main Street. NYSEG will reactivate that service and the IRM contractor will make the interconnection to the existing STCC building natural gas infrastructure on the roof of the building. NYSEG will deactivate the natural gas service at the gas house and the existing connection at the STCC building will be capped. No soils will be disturbed as part of the natural gas service relocation.

#### 3.3 <u>Removal of PCB-Impacted Material from OS2</u>

OS2 will be exposed as part of the shallow soil removal presented in Section 3.2. The top of OS2 has been observed to be twelve to thirty-six (12 to 36) inches below the ground surface. Once exposed, the concrete top of OS2 will be removed and stockpiled for cleaning and off-Site transport and disposal. The 18-in clay pipe connecting CB-10 to OS2 will be inspected to verify that the pipe does not discharge to the Site Culvert. If the connection to OS2 is confirmed by visual inspection, the CB-10 will be isolated and the pipe will be flushed with water in the direction of OS2 to remove fine-grained material from the line. In-line camera survey will be used to verify that fine-grained material has been removed. If more than *de minimis* quantities of fine-grained material are observed, the line will be re-cleaned and re-inspected. A grout slurry will then be injected into the pipe in order to plug the line up to the southern edge of the Site Culvert. The surface ring at CB-10 will be removed. CB-10 will be grouted up to one (1) ft bgs and then backfilled with imported fill.

Standing water within OS2 will be removed by suction provided by a vacuum truck and contained on-Site in a water management area for later off-Site disposal. Next, fine-grained material within the structure will be removed by suction provided by a vacuum truck and transferred to a solids stabilization area for stabilization with cement kiln dust prior to off-Site disposal. Cement kiln dust will be mixed into the saturated fine-grained material (43 - 65% moisture based on analytical results – see **Table 6**) in order to reduce the moisture content to levels that will be acceptable to

the receiving facility. Mixing will be performed in batches using an excavator bucket outfitted with a guard to prevent damage to the bottom liner. A layer of geotextile fabric will be place on top of the bottom liner as an indicator to the operator. The solids stabilization area will be bermed and lined to contain leachate. A sump will be place at the lowest point within the bermed area for leachate collection if necessary.

The inner surfaces of the OS2 structure will then be cleaned in order to remove any potential residual material. Fluids generated as part of the cleaning will also be contained on-site in the water management area for later off-Site disposal. Samples of concrete will be collected from the walls and floor of OS2 to confirm the cleaning of the inner surfaces of OS2. Porous surface samples will be collected from five (5) locations on the floor of OS2 and five (5) locations from the walls as shown on Figure 21. Wipe samples will be collected from non-porous surfaces. Procedures for sampling of porous and non-porous surfaces are described in Section 4.1 and 4.2, respectively. Samples will be submitted to a fixed laboratory for analyses for PCBs. The need for re-cleaning and re-sampling will be assessed based on the disposition of the material. Non-porous material (e.g., metal baffles) will be re-cleaned and re-sampled if total PCB concentrations in wipe samples are greater than one hundred (100) micrograms per square centimeter (cm<sup>2</sup>). Porous material to be removed for off-Site disposal will be re-cleaned and resampled if total PCB concentrations in concrete cores are greater than or equal to fifty (50) mg/kg. Porous material that will remain in place will be re-cleaned and re-sampled if total PCB concentrations in concrete cores are greater than or equal to one hundred (100) mg/kg based on allowable concentrations for bulk PCB remediation waste for capped areas as defined in 40 CFR 761, Section 61.

After water and fine-grained material have been removed from OS2, the following inlet and outlet connections to OS2 will be grouted closed:

- 18-inch inlet pipe on the south wall (traversing the Site Culvert);
- 5-ft box culvert inlet on the east wall;
- Four (4) 12-inch outlet pipes on the south wall (discharging to Site Culvert); and
- 12-in high by 52-in wide rectangular opening on the south wall.

The interior of the 5-ft box culvert will be inspected for integrity and the thickness of fine-grained material. Samples of fine-grained material, if present, will be collected for characterization prior to closure.

#### 3.4 <u>Removal of OS2</u>

After PCB-impacted material has been removed from OS2, the OS2 structure will be demolished and removed. Soils surrounding OS2 will be excavated as shown on the Construction Drawings (**Appendix I**) on the north, east, and west sides. The south wall of OS2 is adjacent to the Site

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Culvert. Temporary support of excavation (SOE) and benching will be required for areas of the Site with excavation depths of four (4) feet or greater. Excavation side slopes of two (2) horizontal to one (1) vertical (2H:1V) will be implemented on the west side of OS2 and excavation side slopes of one (1) horizontal to one (1) vertical (1H:1V) will be implemented on the north and east sides of OS2. After the exterior of OS2 has been exposed, OS2 will be demolished and removed from the excavation. Because the south wall of OS2 may be connected to the Site Culvert, the southern wall will be kept in place by cutting the east and west walls and floor of OS2 as shown on the Construction drawings. Soil and debris from the excavation and removal of OS2 will be stockpiled for disposal. Documentation samples will be collected from the sidewalls at 2-ft depth intervals and bottom of the excavation to remove OS2 as shown on the Construction Drawings in accordance with Section 5.4 (b) of DER-10. Documentation samples will be submitted to the fixed laboratory for analyses for PCBs and metals in accordance with QAPP.

#### 3.5 <u>Backfilling</u>

Imported fill material and/or stockpiled soil approved by NYSDEC for reuse will be used to backfill the excavation up to the ground surface. Reused or imported backfill material will meet the requirements specified in DER-10 under Section 5.4(e) and Table 5.4(e). The fill material will be compacted in order to maintain the integrity of the cover with accommodation for settling and subsidence and to have permeability consistent with natural subsoils present.

#### 3.6 Off-Site Disposal

#### 3.6.1 Hazardous Fine-Grained Material

Fine-grained material was collected from OS2 during Phase 1 of the RI and during the IRM PDI for analyses for hazardous waste characteristics and total PCBs in order to anticipate disposal requirements for material to be generated during the IRM. Sample locations are shown on Figure **5**. Total PCB concentrations ranged from sixteen to two hundred thirty-four (16 to 234) milligrams per kilogram (mg/kg) as shown on **Table 6**. Total PCB concentrations in composited OS2 fine-grained material were above the federal TSCA disposal criterion of fifty (50) mg/kg. OS2 fine-grained material had no other characteristics of hazardous waste as shown on **Table 6**. Therefore, OS2 fine-grained material will be classified as PCB remediation waste under TSCA and as hazardous waste containing PCBs as defined in 6 NYCRR Part 371.4 (e). Stabilized fine-grained material will be loaded from the solids stabilization area onto trucks for transport for off-Site disposal as hazardous waste at an appropriate treatment storage and/or disposal facility. Each shipment will have the required manifest, labeling and placarding in accordance with Federal and state laws and regulations.

#### 3.6.2 Hazardous Soils

Soils with total PCB concentrations greater than or equal to fifty (50) mg/kg will be classified as PCB remediation waste under TSCA and as hazardous waste containing PCBs as defined in 6

NYCRR Part 371.4 (e). Soils classified as hazardous waste will be accumulated in the TSCA stockpile prior to loading in the TSCA Loading Area for off-site disposal. Trucks will be loaded in the loading area for transport of hazardous waste for off-Site disposal at an appropriate treatment storage and/or disposal facility. Each shipment will have the required manifest, labeling and placarding in accordance with Federal and state laws and regulations.

#### 3.6.3 Non-hazardous Soils

Soils with total PCB concentrations less than fifty (50) mg/kg will be managed as non-hazardous waste to be transported off-Site for disposal at an appropriate treatment storage and/or disposal facility. Non-hazardous soils accepted for disposal will be stockpiled and staged for disposal as non-hazardous waste. Waste profiles will be developed based on sampling of the non-hazardous soil stockpile for waste characteristics at a frequency consistent with the requirements of the receiving facility. Stockpiles will be maintained and secured so that soils do not migrate from staging and stockpile locations.

#### 3.6.4 Contact Water

Waste profiles will be developed for material generated as part of the IRM (e.g., contained water from OS2, decon water). Those materials will be transported and disposed of off-Site at an appropriate treatment storage and/or disposal facility.

#### 3.6.5 Off-Site Transport

The planned on-site journey management plan for the material which will be handled during the IRM will be discussed with the City of Elmira Traffic Engineering Department. All trucks hauling impacted soils on the public roadway will have a valid NYS Part 364 Waste Transporter Permit. All trucks leaving the Site for off-Site disposal will travel north on South Main Street, cross the Chemung River and travel east on East Water Street to the interchange with Interstate 86. Routes have been selected to avoid planned road construction in Elmira during the IRM, difficult traffic areas as well as to utilize routes with the most marked pedestrian crossings to ensure maximum safety.

Each vehicle will be inspected prior to shipment. Each vehicle will be lined and covered, and the tailgate secured. The wheels, sides and underbody will be decontaminated prior to departure from the Site.

Based on proposed volumes of soil and debris to be transported off-Site for disposal, necessary truck traffic necessary for off-Site disposal has been estimated as 10 to 12 loads per day for hazardous waste and 18 to 20 loads per day for non-hazardous waste. Off-Site transport is anticipated to be completed over one (1) week pending waste profile approvals. Transport on public roads for off-Site disposal (hazardous and non-hazardous waste) will not exceed 35 loads per day without prior notification of NYSDEC. Truck traffic will not take place during EHS student arrival/departure times.

#### 3.7 Site Restoration

After completion of the OS2 IRM, disturbed areas will be restored to original grades. Unpaved areas will be reseeded based on original conditions. Paved areas that were disturbed by excavation will be repaved. Fencing between the STCC and EHS properties will be restored with temporary posts in anticipation of future remedial activities.

#### 4. QUALITY ASSURANCE

#### 4.1 <u>Porous Surface Sample Collection</u>

Porous surface (e.g. concrete, brick, and/or block surfaces) samples will be collected from the floor and walls of OS2 in accordance with 40 CFR 761 Subpart N. A carbide drill bit with a diameter of 7/8 or 1 inch will be used to generate a fine powder, or other representative sample, suitable for extraction and analysis for the porous surface to be sampled. The maximum sampling depth will be 7.5 cm. For soft surfaces, chisels or sharp knives may be used to collect samples. Porous surface samples will be collected in accordance with the following general protocol:

- A hammer drill of sufficient size to accept a 7/8 or 1 inch drill bit will be used to advance the drill bit;
- The drill bit will have been decontaminated before use;
- The sampling location and sediment depth will be identified and recorded in the field logbook;
- Clean (new) nitrile protective gloves will be worn to prepare porous surface (i.e. removing accumulated solids and debris from surface) prior to sampling;
- Gloves used to prepare surface will be replaced with new nitrile gloves for collecting samples;
- A hole will be cut in aluminum foil or aluminum pan just large enough to allow the drill bit to pass through;
- Aluminum foil or aluminum pan will be placed on surface to be sampled with hole aligned on the sample location;
- Drill bit will be aligned with hole over sample location;
- Appropriate personal protective equipment will be worn prior to drilling:
  - o Protective eyewear (ANSI Z87.1)
  - o Steel-toed footwear
  - Nitrile gloves
  - o Dust mask
  - o Leather gloves, as required for using hammer drill
  - Hard hat (if required)
  - o High-Vis reflective vest (if required)
- Drilling will begin by advancing the tip of the drill bit to the predetermined sample depth (typically three (3) inches maximum). Cuttings/pulverized sample material will be

deposited on the aluminum foil/pan. NOTE: some of the sample may fall back into the hole; the sampler may need to use a small tool or even a nitrile gloved finger to fully evacuate the hole, if a nitrile gloved finger is used the nitrile gloves will need to be replaced to avoid contaminating the exterior of the sample jar and drill bit;

- Cutting/pulverized sample material will be placed into laboratory-supplied glass jar.
- Jar will be labeled with date, time, and sample name as described in the QAPP;
- Sample location will be recorded on project-specific sample logs in accordance with QAPP;
- Decontaminate all sampling equipment in accordance with project sampling equipment decontamination procedures;
- Complete chain-of-custody forms, prepare shipping containers, and send to laboratory for analysis; and
- Dispose of sampling wastes generated in accordance with established guidelines.

Porous surface samples will be placed in appropriate sample containers, sealed, and submitted to the laboratory for analyses. The samples will be labeled, handled, and packaged following the procedures described in Site-specific QAPP. QC samples will be collected at the frequency detailed in the Site-specific QAPP.

#### 4.2 <u>Non-Porous Surface Sample Collection</u>

Non-porous surface samples will be collected from the steel wall separating the outlet chamber from the separation chamber (**Figure 21**). Non-porous surface samples will be collected in accordance with 40 CFR 761 Subpart P. A standard wipe test will be used to sample one 10 cm by 10 cm square ( $100 \text{ cm}^2$ ) area to represent surface area PCB concentrations of each square meter or fraction of a square meter of nearly flat non-porous surface.

Steps for collecting the wipe samples are as follows:

- Locate sample location;
- Don personal protective equipment (PPE) per the HASP;
- Put on clean (new) nitrile protective gloves for collecting samples;
- Place paper template (provided by laboratory) with 10-cm x 10-cm cutout on non-porous surface;
- Remove hexane-soaked gauze pad (for PCB sampling). Using gauze pad, wipe entire cutout area from side to opposite side. Refold gauze pad and wipe in perpendicular direction of first wipe, side to opposite side of entire cutout;

- Place gauze pad back in sample container;
- Label sample jar per the Site-specific QAPP;
- Remove PPE and place in appropriate disposal container;
- Complete chain-of-custody forms, prepare shipping containers, and send to laboratory for analysis;
- Record exact sample location on the project specific sample logs in accordance with the Site-specific QAPP; and
- Repeat procedure for total number of samples required.

Wipe samples will be placed in appropriate sample containers, sealed, and submitted to the laboratory for analyses. The samples will be labeled, handled, and packaged following the procedures described in Site-specific QAPP. QC samples will be collected at the frequency detailed in the Site-specific QAPP.

#### 4.3 <u>Decontamination Procedures</u>

Non-dedicated equipment and tools used to collect samples for chemical analyses will be decontaminated prior to and between each sample using an Alconox rinse and potable water rinse. Additional cleaning of the equipment with steam may be needed under some circumstances. Decontamination fluids will be discharged to the ground surface unless a visible sheen or odor is detected on either the equipment or the fluids, at which point the decontamination water will be staged in an appropriate container and disposed of appropriately.

#### 4.4 Data Validation

Data validation will be performed on all analytical data generated for the IRM to verify and validate the usability of those data in accordance with the QAPP. Analytical data packages will be reviewed for completeness and field and laboratory QC sample results will be evaluated. Verification and validation will be based on completeness and compliance checks of sample receipt conditions, both sample-related and instrument-related QC results, recalculation checks, and review of actual instrument outputs. Data Usability Summary Reports (DUSRs) will be prepared and included in the Construction Completion Report.

#### 5. PERMITS AND TEMPORARY CONTROLS

#### 5.1 <u>Permits and Notifications</u>

Unisys will notify the United States Environmental Protection Agency (EPA) of PCB waste activities by filing EPA Form 7710–53 in accordance with 40 CFR §761.205. Unisys will submit EPA Form 8700-12 to provide initial notification of Resource Conservation and Recovery Act (RCRA) Subtitle C Activity and to obtain an EPA Identification Number for the Site.

A storm water construction permit is not required as the area of disturbance from construction activities for the IRM is expected to be less than one acre.

Storm water piping modifications presented in Section 3.1 will not affect State Pollution Discharge Elimination System (SPDES) permit held by ECSD (SPDES# NY0106216; **Appendix K**). The modifications are upstream of the ECSD discharge to the Site Culvert (**Figure 5**) but the ECSD monitoring point is located in the EHS parking lot. A review of NYSDEC and USEPA records found no active SPDES permits for the STCC property. Written approvals from STCC and ECSD of the proposed storm water infrastructure modifications are included in **Appendix J**.

#### 5.2 <u>Temporary Facilities</u>

During IRM construction, temporary facilities for stockpiling excavated soils and solids stabilization will be established as shown on the construction drawings presented in **Appendix I**. All stockpiles will be maintained to avoid having steep sides or faces. At the end of each work day and during periods of extended inactivity or prevailing high wind conditions, stockpiles will be covered with tarps, and the tarps will be secured with sandbags. Stockpiles will not be placed within twenty-fie (25) yards of occupied buildings. Construction trailers will not be placed in areas where potential exposure to PCBs exist.

#### 5.3 Soil and Sediment Erosion Control

Soil and sediment erosion controls will be established within the limit of disturbance as shown on the construction drawings presented in **Appendix I** to control runoff during construction and prevent sediment from entering the existing storm sewer system. Erosion and sediment controls will be in accordance with the "New York Standards and Specifications for Erosion and Sediment Control" (NYSDEC, 2016) and will be inspected weekly during active construction with additional inspections following rain events.

#### 5.4 Water Management

Storm water contacting potentially impacted soils (contact water) will be segregated from storm water entering areas cleaned of impacted soils (non-contact water). Contact and non-contact water shall remain separated at all times. Contact water generated within the excavation will be minimized and managed to the extent practical. Standing water will be pumped into a temporary

storage tank at the Site for off-Site transportation and disposal/recycling as appropriate. Grading shall be performed as necessary to divert surface water runoff from entering excavation areas and all stockpiles will be tightly covered. Diversion control berms and temporary drainage channels shall be constructed as needed and maintained.

Any contact water generated will be conveyed overland via hose to frac tanks staged on-Site. Liquids will be pumped through a filter skid prior to entering the storage tanks as PCBs are typically not readily water soluble and therefore running these liquids through filter bags prior to storage will help to reduce the potential TSCA waste from the project site and therefore the associated elevated costs to the client. Once a tank nears capacity, waste characterization samples will be collected for waste profiling and off-Site disposal.

#### 5.5 <u>Dust, Odor and Organic Vapor Control and Monitoring</u>

Dust control shall be conducted throughout the Site during all phases of work to prevent the presence of visible dust. Visible dust shall not leave the exclusion zone. Dust control measures shall be applied periodically throughout each work day. Dust control may be conducted by sprinkling with water until the surface is wet; mulching at two to two and one-half (2 to 2.5) tons per acre with anchoring, restricting vehicle speeds, covering excavation areas; and reducing the excavation size and/or number of excavations. Spray-on adhesive may also be used in areas of no vehicular traffic.

IRM activities are not anticipated to generate unacceptable airborne emissions. However, as a contingency measure, New York State Department of Health's (NYSDOH's) Generic Community Air Monitoring Plan (CAMP) will be implemented during the IRM. Initial air monitoring data for each activity will be used to evaluate the need for continued monitoring. If required, continuous real-time particulate and VOC monitoring will be conducted at the upwind and downwind perimeter of the exclusion zone using portable monitors. A minimum of one (1) upwind and four (4) downwind locations shall be monitored. The four (4) downwind locations shall be equally distributed along the perimeter of the work area. Air monitoring shall be conducted during excavation, grading, placement of clean fill, or other activities which may generate fugitive dust. The CAMP will be implemented at the start of each new ground intrusive activities to establish an air monitoring database. A copy of the CAMP is included in **Appendix L**.

#### 6. HEALTH AND SAFETY

All Site activities will be performed in such a manner as to ensure the safety and health of all personnel and the surrounding community. All Site activities shall be conducted in accordance with all pertinent general industry (29 CFR 1910) and construction (29 CFR 1926) Occupational Health and Safety Administration (OSHA) standards, as well as any other applicable New York State and municipal codes or ordinances. All Site activities will comply with those requirements set forth in OSHA's final rule entitled Hazardous Waste Operation and Emergency Response (HAZWOPER), 29 CFR 1910.120, Subpart H. Entry into OS2 and other stormwater structures will be evaluated for confined space entry requirements in accordance with 29 CFR 1910.146.

To ensure that all Site activities are in compliance, each contractor will prepare a Health and Safety Plan (HASP) in accordance with the aforementioned regulations. The HASP shall conform to the requirements of 29 CFR 1910.120 and all applicable state, federal, local, and other health and safety requirements and safe construction practices not specifically identified in these requirements.

#### 7. INSTITUTIONAL CONTROLS

Unisys will evaluate the need for institutional controls during the design of the Remedial Action for the Site. Because the proposed IRM could leave PCBs in concrete structures to remain in place, potential institutional controls may include requirements to identify to any purchaser that the land has been used for PCB remediation waste disposal, is restricted to low occupancy use and the presence and maintenance requirements of fences or caps. STCC has been notified and has provided in writing that such institutional controls would be acceptable should this be the case (**Appendix J**).

#### 8. SCHEDULE AND DELIVERABLES

#### 8.1 <u>Schedule</u>

The proposed schedule for the OS2 IRM is presented in **Appendix M**. Unisys will procure an IRM contractor no later than two (2) weeks, from receipt of written notice to proceed from NYSDEC or access is obtained from the property owners, whichever is later. The IRM contractor will mobilize to the Site, weather permitting, within two (2) weeks of notice of intent to award a contract or access is obtained from the property owners, whichever is later. The OS2 IRM will be conducted in phases. Phase I of the OS2 IRM will be conducted in November 2019 will consist of storm water piping modifications on the STCC property. The duration of the Phase I on-Site work is anticipated to be approximately three (3) weeks. The natural gas service to the STCC building will be relocated prior in October 2019 prior to construction.

Phase II of OS2 IRM construction will begin in March 2020. During Phase II, the IRM contractor will set up temporary facilities and controls and proceed with shallow soil removal, material



removal from OS2, OS2 demolition, backfilling and EHS property storm water piping modifications. Waste profiles of stabilized sediment will be developed prior to removal from the OS2 structure. Off-site transport and disposal of stabilized sediment will be arranged following receipt of the waste profile. Other waste profiles (e.g. water, soil) will be developed by sampling the containment or stockpile. Off-site transport and disposal of those wastes will be arranged following receipt of those waste profiles. The duration of Phase II on-site work is anticipated to be approximately five (5) weeks.

#### 8.2 <u>Deliverables</u>

A construction completion report (CCR) will be prepared in accordance with Section 5.8 of DER-10 to document the implementation of the IRM. The CCR will include a description of IRM construction activities, as-built drawings, daily field reports, analytical data reports, and disposal manifests. The CCR will be submitted to NYSDEC within ninety (90) days of completion of on-Site construction.

## TABLES

#### TABLE 1 SUMMARY OF TEST PIT ANALYSTICAL RESULTS Former Sperry Remington Site Elmira, New York

Beech and Bonaparte

11/7/2018

										STCC							EHS		
						Location	OS-58-01	OS-SB-02	TP-1	TP-2	TP-3	TP-4	TP01-01	TP02-02	TP02-01	TP03-01	TP04-01	TP04-02	TP04-02
						Field_ID	OC-SB-01-0-11.5_07-27-12	OS-S8-02-0-9.5_07-30-12	Test Pit - 1	Test Pit - 2	Test Pit - 3	Test Pit - 4	TP01_01_110917	TP02_02_110817	TP02_01_110817	TP03_01_111017	TP4_01_111317	TP4_02_111717	TP4_03_111717
						Sample Date	7/27/2012	7/30/2012	8/24/2011	8/24/2011	8/24/2011	8/24/2011	11/9/2017	11/8/2017	11/8/2017	11/10/2017	11/13/2017	11/17/2017	11/17/2017
						Depth Interval (ft bgs)	0-11.5	0-9.5	3.5-4	12-12.5	9-9.5	6.5-7	0-8	0-8	0-8	0-11	0-11.5	0-10	11-11
				Soil Cleanup	Objective (SCO)														
Analytical Group	Constituent of Concern	Units	EQL	Industrial	Restricted - Residential	NYS Hazardous Waste													
Polychlorinated	Arochlor 1016	mg/kg	0.006				<0U1	<0UJ	<0U	<0U	<0U	<0U	<0.0065U	<0.12U	<0.0061U,F1	<0.0063U	<0.006U	<0.0064U	<0.0063U
Biphenyls	Arochlor 1221	mg/kg	0.012				<0UJ	<0UJ	<0U	<0U	<0U	<0U	<0.013U	<0.24U	<0.012U	<0.013U	<0.012U	<0.013U	<0.013U
	Arochlor 1232	mg/kg	0.011		1		<0UJ	<0UJ	<0U	<0U	<0U	<0U	<0.012U	<0.22U	<0.011U	<0.012U	<0.011U	<0.012U	<0.011U
	Arochlor 1242	mg/kg	0.011				<0U1	<0UJ	<0U	<0U	<0U	<0U	<0.012U	<0.22U	<0.011U	<0.012U	<0.011U	<0.012U	<0.012U
	Arochlor 1248	mg/kg	0.018				26J	9.9J	7.7	0.96	0.058	0.15	3.6	41	3.8	0.2	1.8	0.15	0.029
	Arochlor 1254	mg/kg	0.013		1		22J	8.3J	<0U	<0U	<0U	0.15	2.1	19	2.3	0.11	1	0.076	<0.013U
	Arochlor 1260	mg/kg	0.0055		1		<0UJ	<0UJ	<0U	<0U	<0U	<0U	0.38	3.6	0.42	0.019	0.28	0.023	<0.0055U
	Arochlor 1268	mg/kg	0.0089				<0UJ	<0UJ	<0U	<0U	<0U	<0U	<0.0097U	<0.18U	<0.0091U	<0.0094U	<0.0089U	<0.0095U	<0.0094U
	Arochlor 1262	mg/kg	0.013				<0UJ	<0UJ	<0U	<0U	<0U	<0U	<0.014U	<0.26U	<0.013U	<0.014U	<0.013U	<0.014U	<0.014U
	Total PCBS	mg/kg		25	1	50	48	18.2	7.7	0.96	0.058	0.3	6.08	63.6	6.52	0.329	3.08	0.249	0.029
Metals	Arsenic	mg/kg	1.1	16	16				27	140	330J	11	160	17	18	7.1	17	11	7.5
	Barium	mg/kg	22	10000	400				130J	250J	240J	771	360	270	290F1	74	130	370	77
	Beryllium	mg/kg	0.43	2700	72				0.47	0.52	0.92	<0U	0.41J	0.43	0.71	0.43J	0.49	0.44J	0.38J
	Cadmium	mg/kg	0.044	60	4.3				0.91J	1J	0.55J	0.18J	<0.044U	0.34J	0.39J	0.17J	0.49J	0.21J	0.17J
	Calcium	mg/kg	540						1400	530J	2600	620	620	2200	6000F1.F2	16.000	2700	3600	1500
	Cobalt	mg/kg	5.4						8.7	5.91	5.61	2.71	41	7	9.3	7.1	8.6	7.7	7.2
	Iron	mg/kg	11						76.000J	85.000J	44,000J	36.0001	42.000	38.000	38.000	18.000	40.000	34.000	22.000
	Magnesium	mg/kg	540						380J	220J	290J	920	280J	1500	1600	3100	1700	1600	1400
	Mercury	mg/kg	0.035	5.7	0.81				0.7J	0.047J	1.7J	0.16J	0.27	0.41	0.43	0.034J	0.19	0.034J	0.037
	Nickel	mg/kg	4.3	10000	310				33	20	31J	8.1	25	81	150F1	23	170	130	170
	Potassium	mg/kg	540		1				590J	590J	550J	580J	940	580	750	810	660	650	510J
	Silver	mg/kg	0.11	6800	180				<0U	<0U	0.48J	<0U	0.18J	<0.11U	<0.12U	<0.12U	<0.12U	<0.13U	<0.12U
	Sodium	mg/kg	540						430J	190J	200J	<0U	550J	110/	280/	100J	4001	470J	130J
	Zinc	mg/kg	2.2	10000	10000				61J	40J	36J	271	26	130	180F1	83	330	130	120
SVOCs	1,4-Dioxane	mg/kg	0.056	250	13								<0.06U	<0.11U	<0.056U	<0.059U	<0.056U	<0.059U	<0.059U
	2-methylphenol	mg/kg	0.033	1000	100				<0U	<0U	<0U	<0U	<0.035U	<0.066U	<0.033U	<0.034U	<0.033U	<0.035U	<0.035U
	4-nitroaniline	mg/kg	0.13		-				<0UJ	<0UJ	<0UJ	<0UJ	<0.14U	<0.27U	<0.13U	<0.14U	<0.13U	<0.14U	<0.14U
	Acenaphthylene	mg/kg	0.027	1000	100				<0U	<0U	<00	<0U	<0.027U	0.0771	0.18	0.037J	0.051J	<0.027U	<0.027U
	Acetophenone	mg/kg	0.026						<0U	<00	<00	<0U	<0.028U	<0.051U	<0.026U	<0.027U	<0.026U	<0.027U	<0.027U
	Anthracene	mg/kg	0.029	1000	100				<0U	<0U	<0U	<0U	<0.03U	0.073J	0.16	0.045J	0.036J	<0.029U	0.029J
	Benz(a)anthracene	mg/kg	0.031	11	1				0.18	<0U	<0U	<0U	0.076J	0.29	0.42	0.21	0.11	<0.031U	0.12
	Benzo(b)fluoranthene	mg/kg	0.034	11	1				0.15	<0U	<0U	<0U	0.082	0.39	0.63	0.32	0.18	<0.034U	0.12
	Benzo(g,h,i)perylene	mg/kg	0.034	1000	100				0.1	<0U	<0U	<0U	<0.035U	0.25	0.31	0.19	0.12	<0.034U	0.0711
	Benzolk)fluoranthene	mg/kg	0.027	110	3.9				<0U	<0U	<0U	<0U	<0.028U	0.11/	0.19	0.075J	0.048J	<0.027U	0.04J
	Chrysene	mg/kg	0.075	110	3.9				0.34	<0U	<0U	<0U	0.22	0.45	0.7	0.24	0.26	0.079	0.13
	Dibenz(a,h)anthracene	mg/kg	0.073	110	0.33				<0U	<00	<00	<00	<0.033U	<0.062U	0.09	<0.032U	<0.031U	<0.032U	0.056J
	Dibenzofuran	mg/kg	0.03	1000	59				0.16J	<00	<00	<00	0.21	0.33J	0.14	<0.031U	<0.0310	<0.031U	<0.032U
	Elugranthene	mg/kg	0.075	1000	100				0.28	0.021J	0.056J	<00	0.13	0.5	1	0.0510	0.22	0.0391	0.15
	Fluorene	mg/kg	0.073	1000	100				<0U	<0U	<00	<00	<0.029U	<0.053U	0.048J	<0.028U	<0.027U	<0.028U	<0.028U
	Hexachlorobenzene	mg/kg	0.027	1000	12				<00	<00	<00	<00	<0.0230	<0.0550	<0.040J	<0.031U	<0.03U	<0.0200	<0.032U
	Indeno[1.2.3-c.d]pyrene	mg/kg	0.03	11	0.5				0.06J	<00	<00	<00	<0.031U	0.2	0.26	0.17	0.089	<0.03U	0.079
	Naphthalene	mg/kg	0.028	1000	100				0.3	0.034J	0.0271	0.049J	0.37	0.95	0.27	<0.028U	0.0561	<0.028U	<0.028U
	Pentachlorophenol	mg/kg	0.71	55	6.7				<0U	<00	<0U	<0U	<0.76U	<1.4U	<0.71U	<0.74U	<0.710	<0.74U	<0.74U
	Phenanthrene	mg/kg	0.075	1000	100				0.7	0.1	0.085J	<00	0.54	0.68	0.76	0.11	0.17	0.058J	0.18
	Phenol	mg/kg	0.075	1000	100				<0U	<0U	<0U	<00	<0.054U	<0.1U	<0.05U	<0.053U	<0.05U	<0.058J	<0.053U
	Prene	mg/kg	0.05	1000	100				0.18	0.023J	0.039J	<00	0.12	0.10	0.050	0.31	0.23	0.037J	0.0530
	In Avenue	1-08/18	0.075	1000	100				0.10	0.0251	1 0.0353	1 100	1 0.12	0.44	0.7	0.51	U.23	0.0573	0.4

MN0832A/Table 1 - OS2 Soil Total (1)

Mate:
 J - estimated value
U - non-detect
- not analyzed
mg/kg - milligram per klogram
mg/kg - milligram per klogram
h bg- feet below ground studies
h bg- feet below ground studies
h bg- feet below ground studies
NOCO- Senie value Organic Compounds
Concentrations detected above restricted use 601 Cleanup Objectives (SCOs) presented in 6 NYCRR Subput 375 are presented in light grey.
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#### TABLE 2a PCB Results for Surface and Shallow Subsurface Soil Borings - STCC Former Sperry Remington Site Elmira, New York

						Polych	orinated	Biphenyl	s			
			Arochlor 1016	Arochlor 1221	Arochlor 1232	Arochlor 1242	Arochlor 1248	Arochlor 1254	Arochlor 1260	Arochlor 1268	Arochlor 1262	Total PCBs
			mg/kg	mg/kg								
EQL			0.004	0.004	0.004	0.004	0.004	0.004	0.004	0.004	0.004	
Industrial Soil Cl	1 2											25
NYS Hazardous	Waste											50
Location	Sample Depth Range (ft bgs)	Sample Date										
OS-SB-03	0-1	4/23/2018	<0.0063U	<0.013U	<0.011U	<0.012U	1.5	0.89	0.24	<0.0094U	<0.014U	2.663
OS-SB-03	1-2	4/23/2018	<0.066U	<0.13U	<0.12U	<0.12U	10	4.3	0.9	<0.098U	<0.14U	15.54
OS-SB-04	0-1	4/23/2018	<0.064U	<0.13U	<0.12U	<0.12U	11	5.2	1.2	<0.095U	<0.14U	17.73
OS-SB-04	1-2	4/23/2018	<0.062U	<0.12U	<0.11U	<0.11U	9.3	3.7	0.94	<0.093U	<0.13U	14.25
OS-SB-05	0-1	4/23/2018	<0.0063U	<0.012U	<0.011U	<0.012U	3	2.1	0.6	<0.0094U	<0.014U	5.732
OS-SB-05	1-2	4/23/2018	<0.0061U	<0.012U	<0.011U	<0.011U	3	1.8	0.51	<0.0092U	<0.013U	5.341
OS-SB-06	0-1	4/24/2018	<0.066U,F1	<0.13U	<0.12U	<0.12U	16J	7.1J	1.7J	<0.098U	<0.14U	25.14
OS-SB-06	1-2	4/24/2018	<0.065U	<0.13U	<0.12U	<0.12U	16J	6.4J	1.5J	<0.096U	<0.14U	24.24
OS-SB-07	0-1	4/24/2018	<0.0061U	<0.012U	<0.011U	<0.011U	2J	1.1J	0.29J	<0.0092U	<0.013U	3.421
OS-SB-07	1-2	4/24/2018	<0.0062U	<0.012U	<0.011U	<0.011U	2.3J	1J	0.23J	<0.0092U	<0.013U	3.561
OS-SB-08	0-1	4/24/2018	<0.0064U	<0.013U	<0.012U	<0.012U	2J	1J	0.27J	<0.0096U	<0.014U	3.304
OS-SB-08	1-2	4/24/2018	<0.0059U	<0.012U	<0.011U	<0.011U	0.85J	0.52J	0.13J	<0.0088U	<0.013U	1.531
OS-SB-09	0-1	4/23/2018	<0.0062U	<0.012U	<0.011U	<0.011U	3	3.2	0.46	<0.0093U	<0.013U	6.691
OS-SB-09	1-2	4/23/2018	<0.0062U	<0.012U	<0.011U	<0.011U	1.9	2.2	0.44	<0.0092U	<0.013U	4.571
OS-SB-10	0-1	4/23/2018	<0.31U	<0.62U	<0.57U	<0.57U	45	35	5.7	<0.47U	<0.67U	87.31
OS-SB-10	1-2	4/23/2018	<0.0065U	<0.013U	<0.012U	<0.012U	3.4	1.8	0.29	<0.0097U	<0.014U	5.524
OS-SB-11	0-1	4/23/2018	<0.31U	<0.61U	<0.56U	<0.57U	40	21	2.6	<0.46U	<0.66U	65.19
OS-SB-11	1-2	4/23/2018	<0.062U	<0.12U	<0.11U	<0.11U	13	9.3	1.6	<0.093U	<0.13U	24.21
OS-SB-12	0-1	4/23/2018	<0.6U	<1.2U	<1.1U	<1.1U	110	75	8.6	<0.9U	<1.3U	196.7
OS-SB-12	1-2	4/23/2018	<0.35U	<0.71U	<0.65U	<0.65U	81	23	3.6	<0.53U	<0.77U	109.4
OS-SB-13	0-1	4/23/2018	<0.68U	<1.4U	<1.2U	<1.3U	110	97	14	<1U	<1.5U	224.5
OS-SB-13	1-2	4/23/2018	<0.068U	<0.14U	<0.12U	<0.12U	15	5.2	0.82	<0.1U	<0.15U	21.37

MN0832A/Table 2a\_OS2-PCBs\_shallow\_STCC

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#### TABLE 2a PCB Results for Surface and Shallow Subsurface Soil Borings - STCC Former Sperry Remington Site Elmira, New York

						Polychl	orinated	Biphenyls	5			
			Arochlor 1016	Arochlor 1221	Arochlor 1232	Arochlor 1242	Arochlor 1248	Arochlor 1254	Arochlor 1260	Arochlor 1268	Arochlor 1262	Total PCBs
			mg/kg	mg/kg								
EQL			0.004	0.004	0.004	0.004	0.004	0.004	0.004	0.004	0.004	
Industrial Soil Cle	anup Objective											25
NYS Hazardous V	Vaste											50
Location	Sample Depth Range (ft bgs)	Sample Date										
SSHS-B557	0-2	9/7/2016	<0.0041U	<0.0064U	<0.0022U	<0.0033U	1.1J	0.72J	0.13J	<0.0017U	<0.0028U	1.96
SSHS-B558	0-2	9/7/2016	<0.002U	<0.0032U	<0.0011U	<0.0016U	0.55J	0.27J	0.04J	<0.00083U	<0.0014U	0.8651

<u>Notes:</u> J - estimated value U - non-detect

U - non-detect PCBs - polychlorinated biphenyls Concentrations detected above the industrial soil criteria for PCBs (0-2 ft bgs) of 1 mg/kg (NYSDEC CP-51) are presented in grey. PCB concentrations detected above New York State hazardous waste threshold (6 NYCRR Part 371.4 (e)) are presented in dark grey

MN0832A/Table 2a\_OS2-PCBs\_shallow\_STCC

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#### TABLE 2b PCB Results for Surface and Shallow Subsurface Soil Borings - EHS Former Sperry Remington Site - North Elmira, New York

				Poly	chlorinate	d Biphenyl	s			
	Arochlor 1016	Arochlor 1221	Arochlor 1232	Arochlor 1242	Arochlor 1248	Arochlor 1254	Arochlor 1260	Arochlor 1268	Arochlor 1262	Total PCBs
	mg/kg	mg/kg								
EQL	0.002	0.0032	0.0011	0.0016	0.0045	0.0045	0.0045	0.00083	0.0014	
Restricted - Residential Soil Cleanup Objective										1
NYS Hazardous Waste										50
Sample Denth	1							-		

Location	Sample Depth Range (ft bgs)	Sample Date										
SSHS-B1028	0-2	5/24/2018	<0.008U	<0.016U	<0.015U	<0.015U	0.24	0.2	0.078	<0.012U	<0.017U	0.5595
SSHS-B1029	0-2	5/23/2018	<0.033U	<0.065U	<0.06U	<0.061U	8.4	6.1	0.92	<0.049U	<0.071U	15.59
SSHS-B1030	0-2	5/24/2018	<0.66U	<1.3U	<1.2U	<1.2U	360	160	31	<0.98U	<1.4U	554.4
SSHS-B1031	0-2	5/24/2018	<0.0067U	<0.013U	<0.012U	<0.012U	3.1	2.6	0.64	<0.01U	<0.014U	6.374
SSHS-B1032	0-2	5/24/2018	<0.0067U	<0.013U	<0.012U	<0.012U	2.4	1.4	0.31	<0.01U	<0.015U	4.144
SSHS-B1066	0-2	6/27/2018	<0.14U	<0.14U	<0.14U	<0.14U	4.5	2.4	0.51J	<0.14U	<0.14U	7.83
SSHS-B903	0-2	1/12/2018	<0.0067U	<0.013U	<0.012U	<0.012U	0.22J	0.11J	0.042J	<0.01U	<0.015U	0.4064

Notes:

J - estimated value

U - non-detect

U - non-detect PCBs - polychlorinated biphenyls Concentrations detected above the restricted residential soil criteria for PCBs (0-2 ft bgs) of 1 mg/kg (NYSDEC CP-51) are presented in grey. PCB concentrations detected above New York State hazardous waste threshold (6 NYCRR Part 371.4 (e)) are presented in dark grey

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## TABLE 3a Metals Results for Surface and Shallow Subsurface Soil Borings - STCC Former Sperry Remugion Site Elmira, New York

													Me	tals										
			Aluminum	Antimony	Arsenic	Barium	Beryllium	Cadmium	Calcium	Chromium (III+VI)	Cobalt	Copper	Iron	Lead	Magnesium	Manganese	Mercury	Nickel	Potassium	Selenium	Silver	Thallium	Vanadium	Zinc
			mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg			mg/kg	mg/kg	mg/kg		mg/kg	
EQL			10	0.37	0.52	10	0.21	0.058	260	0.26	2.6	1.3	5.2	0.52	260	0.78	0.016	2.1	260	0.52	0.086	0.26	2.6	1
Industrial S	oil Cleanup Objective		L		16	10000	2700	60		800		10000		3900		10000	5.7	10000		6800	6800			10000
Location	Sample Depth Range (ft bgs)	Sample Date																						
	0-1	4/23/2018	· ·	•	60	290	•	<0.57U	•	56	-	•	•	100	-	•	0.26		-	2.9	<0.12U	-	•	-
OS-SB-03	1-2	4/23/2018	· ·	-	42	270	•	1.7	•	56	-	•	•	140	-	•	0.32		-	2.3	<0.13U	-	-	-
	0-1	4/23/2018	· ·	-	44	270	•	0.75	•	25	-	•	-	130	-	•	0.37		-	3	<0.12U	-	-	-
	1-2	4/23/2018	· ·	-	32	320	•	0.25J	•	21	-	•	-	85	-	•	0.32		-	2.6	<0.13U	-	-	-
OS-SB-05	0-1	4/23/2018	•	-	18	170	•	0.84	•	34	-	•	-	140	-	•	0.28	-	-	1.9	<0.13U	-	-	-
OS-SB-05	1-2	4/23/2018	•	-	13	140	•	0.2J	•	14	-	•	-	52	-	•	0.05	-	-	1.5	<0.12U	-	-	-
OS-SB-06	0-1	4/24/2018	-	-	39	270J	•	0.31J	•	22J	-	•	•	80J	-	•	0.34J		-	5.9	<0.13U	-	-	-
OS-SB-06	1-2	4/24/2018		-	110	470F1		0.11J		18	-			47			0.33		-	6.8	<0.12U	-	-	-
OS-SB-07	0-1	4/24/2018	· ·	-	28J	130		0.22J		18	-		-	54J			0.16J+		-	2	<0.12U	-	-	-
OS-SB-07	1-2	4/24/2018	•	-	31	140	•	0.23J		21	-	•	-	43	-	•	0.16		-	2.4	<0.11U	-	-	-
OS-SB-08	0-1	4/24/2018	•	-	42	130	•	0.14J		21	-	•	-	64		•	0.15		-	3	<0.12U	-	-	-
OS-SB-08	1-2	4/24/2018	· ·	-	37	110		0.15J		25	-			67	-	•	0.62		-	2.4	<0.12U	-	-	
OS-SB-09	0-1	4/23/2018	· ·		15	97J		0.15J		19	-			60J	-	•	0.2			2.4	<0.12U	-	-	
OS-SB-09	1-2	4/23/2018	· ·		13	130		<0.6U		17	-			58	-	•	0.34			1J	<0.13U	-	-	
OS-SB-10	0-1	4/23/2018	· ·	•	14	140	•	0.2J	•	14	-	•	•	230J		•	0.07			0.78J	<0.13U	-	-	
OS-SB-11	0-1	4/23/2018	•		21	120	•	0.13J		13	-	•	•	34	-	•	0.082			2	<0.12U	-	-	
OS-SB-11	1-2	4/23/2018	•	•	12	180	•	0.16J		20F1	-	•	•	120F1		•	0.045	-		1.1J	<0.12U	-	-	
OS-SB-12	0-1	4/23/2018	· ·	-	23	200	•	0.43J		51	-	•	-	190	-	•	0.061		-	1.5	1.8	-	-	-
OS-SB-12	1-2	4/23/2018	· ·	-	14	160	•	0.26J		22	-	•	•	120	-	•	0.18			2.3	<0.14U	-	-	-
OS-SB-13	0-1	4/23/2018	· ·	-	21	150		0.32J	-	40	-			76	-	-	0.27		-	2.4	<0.13U	-	-	
OS-SB-13	1-2	4/23/2018	· ·	-	15	87		0.18J	-	12	-			80	-	-	0.1	-	-	2.8	<0.13U	-	-	
	1	9/7/2016	4200	<0.37U	39	110	0.25	<0.058U	720	14	3.5	40	29.000	45	1100	150	0.14	21	470	3.1	<0.086U	-0.2611	16	41
SSHS-B557	0-2	9/7/2016	4200	<0.370																				

MN0832A/Table 3a\_OS2-Metals\_STCC

Notes: J - estimated value U - non-detect PCBs - polychlorinated biphenyls Concentrations detected above the industrial soil criteria are presented in grey.

# TABLE3b Metals Results for Surface and Shallow Subsurface Soil Borings - EHS Former Sperry Remington Site Elmira, New York

														Metals											
			Aluminum	Antimony	Arsenic	Barium	Beryllium	Cadmium	Calcium	Chromium (III+V)	Cobalt	Copper	Iron	Lead	Magnesium	Manganese	Mercury	Nickel	Potassium	Selenium	Silver	Sodium	Thallium	Vanadium	Zinc
			mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg		mg/kg	mg/kg	mg/kg		mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg
EQL			7.9	0.14	0.39	7.9	0.16	0.058	200	0.2	2	0.99	3.9	0.39	200	0.59	0.013	1.6	200	0.39	0.066	55	0.2	2	0.79
Restricted - Reside	ential				16	400	72	4.3		110		270		400		2000	0.81	310		180	180				10000
Location	Sample Depth Range (ft bgs)	Sample Date																							
SSHS-B1028	0-2	5/24/2018	10,000	<0.52U	7.8	130	0.51J	0.32J	3200	15	8.2	61	20,000	65	2600	650	0.041	33	1300	<0.79U	<0.16U	58J	<0.32U	15	110
SSHS-B1029	0-2	5/23/2018	5700	3.5	18	150	0.64	0.26J	3300	27	8.2	260	34,000	120	1000	270	0.15	290	860	2	<0.12U	110J	<0.24U	16	99
SSHS-B1030	0-2	5/24/2018	10,000	0.81J	16	130	0.67	0.4J	3200	23	9.9	260	29,000	78	2400	460	0.077	74	1100	1.3	<0.13U	150J	<0.26U	17	120
SSHS-B1031	0-2	5/24/2018	11,000	0.83J	14	130	0.56	0.78	3400	22	8.8	370	33,000	790	2400	540	0.1	140	1100	1.1J	<0.14U	78J	<0.27U	19	370
SSHS-B1032	0-2	5/24/2018	7900	.49J,F1,F	14	180	0.59	0.45J	3600	25	13	180	27,000F2	390F2	2000	390F2	0.18F1	83F1	1000	0.78J	<0.13U	120J	<0.27U	16	160

MN0832/Table 3b\_OS2-Non-PCBs\_SSHS

Notes: J - estimated value U - non-detect mgkg - milligram pr kilogram ft bgs - feet below ground surface Concentrations detected above Restricted Residential SCOs are presented in grey.

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NYS Hazardous LocCode Si DS-SB-04 2- DS-SB-04 4	Sample_Depth_Range 2-4		Muminum Mg/kg	Autimound mg/kg 0.14	mg/kg	mg/kg	, Beryllium	Cadmium	cium	(IN+II) un														
ndustrial Soil ( NYS Hazardous LocCode Sa DS-SB-04 2 DS-SB-04 4	us Waste Sample_Depth_Range 2-4					mg/kg		0	Calc	Chromium	Cobalt	Copper	Iron	Lead	Magnesium	Manganese	Mercury	Nickel	Potassium	Selenium	Silver	Thallium	Vanadium	Zinc
ndustrial Soil ( NYS Hazardous LocCode Sa DS-SB-04 2 DS-SB-04 4	us Waste Sample_Depth_Range 2-4		7.9	0.14	0.39		mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg
NYS Hazardous LocCode Si DS-SB-04 2- DS-SB-04 4	us Waste Sample_Depth_Range 2-4					7.9	0.16	0.048	200	0.2	2	0.99	3.9	0.39	200	0.59	0.013	1.6	200	0.39	0.066	0.2	2	0.79
DS-SB-04 4	Sample_Depth_Range 2-4				16	10000	2700	60		800		10000		3900		10000	5.7	10000		6800	6800			10000
DS-SB-04 2- DS-SB-04 4	2-4																							
DS-SB-04 4																								
	1.6	4/23/2018	•	•	41	190	-	0.34J		15	-	-	-	110	•	-	0.97		-	3.6	<0.12U	•	-	•
)S-SB-04 6	4-0	4/23/2018	-	•	86	260	-	0.37J	-	15	-	-		52	-	-	1.1		-	6	0.14J	•	-	
	5-8	4/23/2018	-	-	100	250	-	0.52J	-	8.9	-	-	-	14	-	-	2.7	-	-	6.8	<0.15U	•	-	-
	2-4	4/23/2018	-	-	29J	270J	-	0.26J	-	16J	-	-	-	38J	-	-	0.089	-	-	2.9	<0.13U	•	-	-
DS-SB-05 4	1-6	4/23/2018	•	•	71	360	•	0.13J	•	13	•	•	•	20	•	-	0.075	•	-	6.1	<0.12U	•	-	•
OS-SB-05 6	5-8	4/23/2018	-	-	54	190	-	0.22J	-	12	-	-	-	24	-	-	0.17	-	-	2.5	<0.13U	-	-	-
DS-SB-06 2-	2-4	4/24/2018	-	-	95	420	-	<0.048U	-	11	-	-	-	15	-	-	0.47	-	-	4.2	<0.14U	-	-	-
DS-SB-06 4	1-6	4/24/2018	-	-	57	190	-	0.14J	-	10	-	-	-	8.5	-	-	0.081	-	-	3	<0.12U	-	-	-
DS-SB-06 6	5-8	4/24/2018	-	•	290	200	-	0.071J	-	16	-	-	-	27	•	-	0.073	-	-	6.6	<0.13U	·	-	-
DS-SB-07 2	2-4	4/24/2018	•	•	37	100	-	0.091J		14	•	•		53	•	-	0.13	•	-	3.2	<0.11U	·	-	•
DS-SB-07 4	1-6	4/24/2018		•	15	82		0.13J		14				15		-	0.062		-	<0.57U	<0.12U		-	
DS-SB-07 6	5-8	4/24/2018		•	12	78	-	0.17J		14				8.2	•	-	0.044		-	0.95J	<0.11U	· ·	-	•
DS-SB-08 2-	2-4	4/24/2018		•	39	62	-	0.059J		15	•			29	•	-	0.11		-	2.4	<0.14U	· ·	-	•
DS-SB-08 4	1-6	4/24/2018			21	80	-	0.067J		10				11		-	0.032J		-	1	<0.11U		-	•
DS-SB-08 6	5-8	4/24/2018	•	•	22	78		0.14J		12	•	•	•	9.7	•	-	0.025J	•	•	0.78J	<0.11U	· ·	-	•
DS-SB-09 2	2-4	4/23/2018		•	17	860		<0.61U		13				180			0.2			1.5	<0.13U			
OS-SB-10 2	2-4	4/23/2018	•	•				-							•		-							•
OS-SB-10 4	1-6	4/23/2018			-	-	-	-		-		-	-	· ·		-	-	-	-	· ·	· ·	· ·	-	-
DS-SB-10 6-	5-8	4/23/2018		•	-	-	-	-	-			-	-	· ·		-	-		-	· ·	· ·	· ·	-	•
DS-SB-10 8	3-10	4/23/2018	•	•											•			•		· ·				•
OS-SB-11 2	2-4	4/23/2018	•	•										•	•					· ·	· ·	•		•
	1-6	4/23/2018														-	-			· ·			-	
	5-8	4/23/2018	•	•						•	•					-	-	•		· ·			-	
	3-10	4/23/2018														-	-						-	
	10-12	4/23/2018	-		-	-	-	-		-	-		-			-	-	-	-				-	
DS-SB-12 2	2-4	4/23/2018	•	•						•	•				•	-	-	•		· ·	· ·	· ·	-	•
	2-4	4/23/2018	•													-	-			•			-	•
	2-4	9/7/2016	4000	0.65J	25	120	0.25	0.3	2100J	30	5	240J	32.000	99	1200	190	0.21	74	410	2	0.16J	<0.26U	15	90
		9/7/2016	5700	0.23J	18	80	0.23	0.092J	1100	14	5.3	42	22,000	26	1700	250	0.039	25	450	1.2	<0.086U	<0.26U	13	50
	-8	9/7/2016	8200	<0.19U	5.9	91	0.29	0.068J	480	14	6.4	22	23.000	9.6	2200	290	0.013J	16	470	0.51	<0.089U	<0.27U	14	56
	3-10	9/7/2016	3800	<0.14U	9.7	59	0.15J	0.0691	620	11	3.2	37	15.000	21	1100	160	0.05	15	330	0.83	<0.066U	<0.2U	8.3	34
		9/7/2016	4300	<0.2U	4.5	41		<0.064U	750	8.6	2.9	14	18.000	5.2	1500	84	0.0091	9	360	0.63	<0.094U	<0.28U	8.2	33
		9/7/2016			-		-			-	-		-				-		-					
		9/7/2016	5800	<0.39U	20	51	0.26	0.093J	14.000	7.9	5.9	27	32.000	8.9	3200	260	0.017	14	340	0.81	<0.09U	<0.27U	11	48
		9/7/2016	6900	<0.19U	7.6	59		<0.0610	2000	10	4.9	22	21,000	9.6	1900	320	0.032	14	350	0.46J	<0.09U	<0.27U	13	49
	-8	9/7/2016	9300	<0.1911	9.2	200J	0.35	0.1	770	13	8	181-	23.000J	12	2300	3001	0.023	17	550	0.5J	<0.089U	<0.27U	15	601
		9/7/2016	6600	<0.2U	8.4	120	0.32	0.074J	1900	15	5.8	105	20,000	15	1800	170	0.028	17	410	0.66	<0.093U	<0.270	12	52
SHS-B558 1		9/7/2016	4600	<0.2U	8.1	50		<0.064U	1100	10	3.4	88	19.000	20	1600	120	0.011J	24	460	0.28J	<0.095U		8.9	47

TABLE 4
PCB and Metals Results for Subsurface Soil Borings - STCC
Former Sperry Remington Site
Elmira, New York

Notes:
J - estimated value
U - non-detect
- No Analysis

uysis							
olyc	hlorina	ted biphe	nyls				

- No Anaysis (PGS - polycholeniated biphenyls) Concentrations detected above the industrial soil criteria are presented in grey. PER concentrations detected above here 'Net' State nazardone wate threshold (6 NVCRE Part 371.4 (cr)) are presented in dark grey.

MN0832A/Table 4 OS2\_Deep

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Beech and Bonaparte

## TABLE 4 PCB and Metals Results for Subsurface Soil Borings - STCC Former Sperry Remington Site Elmira, New York

							Polychlorina	ted Biphenyl	s			
			Arochlor 1016	Arochlor 1221	Arochlor 1232	Arochlor 1242	Arochlor 1248	Arochlor 1254	Arochlor 1260	Arochlor 1268	Arochlor 1262	Total PCBs
				d rmg/kg						₹ mg/kg		
EQL			mg/kg 0.00021	mg/кg 0.00033	mg/kg 0.00011	mg/kg 0.00017	mg/kg 0.00011	mg/kg 0.00017	mg/kg 0.00016	тg/кg 0.000085	mg/kg 0.00014	mg/kg
	oil Cleanup Objective		0.00021	0.00035	0.00011	0.00017	0.00011	0.00017	0.00016	0.000085	0.00014	25
NYS Hazardo												50
1413 11828100	ous waste											
LocCode	Sample_Depth_Range	Sampled_Date-Time										
OS-SB-04	2-4	4/23/2018	<0.0059U	<0.012U	<0.011U	<0.011U	3	1.3	0.38	<0.0089U	<0.013U	4.711
OS-SB-04	4-6	4/23/2018	<0.0066U	<0.013U	<0.012U	<0.012U	3	1.5	0.38	<0.0098U	<0.014U	4.914
OS-SB-04	6-8	4/23/2018	<0.0072U	<0.014U	<0.013U	<0.013U	0.6	0.35	0.1	<0.011U	<0.015U	1.087
OS-SB-05	2-4	4/23/2018	<0.0061U,F2	<0.012U	<0.011U	<0.011U	1.7	0.62	0.2F2	<0.0092U	<0.013U	2.551
OS-SB-05	4-6	4/23/2018	<0.0065U	<0.013U	<0.012U	<0.012U	1.5	0.57	0.17	<0.0097U	<0.014U	2.274
OS-SB-05	6-8	4/23/2018	<0.0068U	<0.014U	<0.012U	<0.013U	1	0.43	0.1p	<0.01U	<0.015U	1.565
OS-SB-06	2-4	4/24/2018	<0.0067U	<0.013U	<0.012U	<0.012U	4.3J	1.3J	0.32J	<0.01U	<0.014U	5.954
OS-SB-06	4-6	4/24/2018	<0.0066U	<0.013U	<0.012U	<0.012U	1.7J	0.73J	0.18J	<0.0099U	<0.014U	2.644
OS-SB-06	6-8	4/24/2018	<0.0067U	<0.013U	<0.012U	<0.012U	0.13J	0.063J	0.014J	<0.01U	<0.015U	0.2414
OS-SB-07	2-4	4/24/2018	<0.0058U	<0.012U	<0.011U	<0.011U	1.1J	0.54J	0.15J	<0.0086U	<0.012U	1.82
OS-SB-07	4-6	4/24/2018	<0.0059U	<0.012U	<0.011U	<0.011U	0.32J	0.18J	0.04J	<0.0089U	<0.013U	0.5709
OS-SB-07	6-8	4/24/2018	<0.0058U	<0.012U	<0.011U	<0.011U	0.11J	0.067J	0.017J	<0.0087U	<0.013U	0.2248
OS-SB-08	2-4	4/24/2018	<0.0062U	<0.012U	<0.011U	<0.011U	0.39J	0.22J	0.061J	<0.0092U	<0.013U	0.7022
OS-SB-08	4-6	4/24/2018	<0.0057U	<0.011U	<0.01U	<0.011U	0.035J	0.019J	<0.005U	<0.0085U	<0.012U	0.0856
OS-SB-08	6-8	4/24/2018	<0.0057U	<0.011U	<0.01U	<0.011U	0.026J	0.014J	<0.005U	<0.0086U	<0.012U	0.07165
OS-SB-09	2-4	4/23/2018	<0.0063U	<0.013U	<0.012U	<0.012U	0.56	0.46	0.085	<0.0094U	<0.014U	1.138
OS-SB-10	2-4	4/23/2018	<0.0067U	<0.013U	<0.012U	<0.012U	2.4	1.3	0.18	<0.0099U	<0.014U	3.914
OS-SB-10	4-6	4/23/2018	<0.0061U	<0.012U	<0.011U	<0.011U	2.7	2.3	0.38	<0.0092U	<0.013U	5.411
OS-SB-10	6-8	4/23/2018	<0.0064U	<0.013U	<0.012U	<0.012U	0.12	0.082	0.0087J	<0.0096U	<0.014U	0.2442
OS-SB-10	8-10	4/23/2018	<0.062U	<0.12U	<0.11U	<0.11U	8.3	9.7	1.8	<0.093U	<0.13U	20.11
OS-SB-11	2-4	4/23/2018	<0.0059U	<0.012U	<0.011U	<0.011U	2.5	1.5	0.19	<0.0089U	<0.013U	4.221
OS-SB-11	4-6	4/23/2018	<0.0062U	<0.012U	<0.011U	<0.011U	1.8	1	0.13	<0.0092U	<0.013U	2.961
	6-8	4/23/2018	<0.0061U	<0.012U	<0.011U	<0.011U	0.61	0.37	0.056	<0.009U	<0.013U	1.067
OS-SB-11	8-10	4/23/2018	<0.0062U	<0.012U	<0.011U	<0.012U	0.51	0.33	0.049	<0.0093U	<0.013U	0.9208
OS-SB-11	10-12	4/23/2018	<0.0065U	<0.013U	<0.012U	<0.012U	0.095	0.038	<0.0057U	<0.0098U	<0.014U	0.1695
OS-SB-12	2-4	4/23/2018	<0.065U	<0.13U	<0.12U	<0.12U	15	4.2	0.72	<0.097U	<0.14U	20.26
OS-SB-13	2-4	4/23/2018	<0.0063U	<0.013U	<0.012U	<0.012U	5.3	3.2	0.73	<0.0095U	<0.014U	9.263
SSHS-B557	2-4	9/7/2016	<0.001U	<0.0016U	<0.00056U	<0.00083U	0.28J	0.25J	0.055J	<0.00042U	<0.00069U	0.5876
SSHS-B557	4-6	9/7/2016	<0.001U	<0.0016U	<0.00056U	<0.00083U	0.25J	0.17J	0.028J	<0.00042U	<0.0007U	0.4506
SSHS-B557	6-8	9/7/2016	<0.00022U,F2,F1	<0.00034U	<0.00012U	<0.00018U	<0.00011U	<0.00018U	<0.00016U,F2,F1	<0.000089U	<0.00015U	<0.001549
SSHS-B557	8-10	9/7/2016	<0.001U	<0.0016U	<0.00056U	<0.00083U	0.28J	0.22J	0.11J	<0.00042U	<0.0007U	0.6126
SSHS-B557	10-12	9/7/2016	<0.00022U	<0.00035U	<0.00012U	<0.00018U	0.00024J	<0.00018U	<0.00016U	<0.000089U	<0.00015U	0.0009645
SSHS-B557	12-14	9/7/2016	<0.00021U	<0.00034U	<0.00012U	<0.00017U	0.0098J	0.0073J	0.0015J	<0.000087U	<0.00014U	0.01913
SSHS-B558	2-4	9/7/2016	<0.00021U	<0.00033U	<0.00011U	<0.00017U	0.00021J	<0.00017U	<0.00016U	<0.000085U	<0.00014U	0.0008975
SSHS-B558	4-6	9/7/2016	<0.00021U	<0.00033U	<0.00011U	<0.00017U	0.07J	0.036J	0.0057J	<0.000085U	<0.00014U	0.1122
SSHS-B558	6-8	9/7/2016	<0.00022U	<0.00034U	<0.00012U	<0.00017U	0.0014J	0.0012J	0.00045J	<0.000088U	<0.00015U	0.003594
SSHS-B558	8-10	9/7/2016	<0.0022U	<0.0034U	<0.0012U	<0.0018U	0.18J	0.092J	0.014J	<0.00089U	<0.0015U	0.2915
SSHS-B558	10-12	9/7/2016	<0.00021U	<0.00034U	<0.00012U	<0.00017U	0.00027J	0.00024J	0.00018J	<0.000088U	<0.00015U	0.001229

MN0832A/Table 4 OS2\_Deep

Notes: J - estimated value U - non-detect - No Analysis PCBs - polychlorin

bove the ial soil criteria are prented in grey. 

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#### TABLE 5 COC CONCENTRATIONS IN EHS AND STCC CATCH BASINS

#### Former Sperry Remington Site Elmira, New York

				Location	CB-1	CB-4	CB-5	CB-6	CB-6	CB-9	CB-10	CB-11	CB-15	CB-15
				Field_ID	CB-1_07-24-12	CB-4	CB-5	CB-6	CB-DUP-01	CB-9	CB-10	CB-11	CB-15_01_111617	CB-15_02_111617
				Sample Date	7/24/2012	5/28/2015	5/28/2015	5/28/2015	5/28/2015	5/28/2015	5/28/2015	5/28/2015	11/16/2017	11/16/2017
			D	epth Interval (ft bgs)	0-1	0-1	0-1	0-1	0-1	0-1	0-1	0-1	0-0.17	0.17-0.83
Analyte Group	Constituent of Concern	Units	EQL	NYS Hazrdous Waste										
Polychlorinated	Arochlor 1016	mg/kg	0.00053		<0U	<0.0028U	<0.00053U	<0.033U	<0.034U	<0.0052U	<0.0007U	<0.003U	<0.048U	<0.28U
Biphenyls	Arochlor 1221	mg/kg	0.00065		<0U	<0.0034U	<0.00065U	<0.041U	<0.042U	<0.0063U	<0.00086U	<0.0036U	<0.096U	<0.55U
	Arochlor 1232	mg/kg	0.0009		<0U	<0.0048U	<0.0009U	<0.056U	<0.057U	<0.0088U	<0.0012U	<0.005U	<0.087U	<0.51U
1	Arochlor 1242	mg/kg	0.00066		<0U	<0.0035U	<0.00066U	<0.041U	<0.042U	<0.0064U	<0.00087U	<0.0037U	<0.088U	<0.51U
	Arochlor 1248	mg/kg	0.00065		<0U	1.2J	<0.00065U	18J	12J	<0.0063U	<0.00086U	<0.0036U	36	190
1	Arochlor 1254	mg/kg	0.0026		0.65	0.49J	0.024J	7.4J	6J	1.1J	0.24J	0.32J	<0.1U	<0.58U
1	Arochlor 1260	mg/kg	0.0026		<0U	0.095J	0.0045J	1J	0.85J	0.55J	0.067J	0.12J	<0.042U	<0.24U
1	Arochlor 1268	mg/kg	0.00053		<0U	<0.0028U	<0.00053U	<0.033U	<0.033U	<0.0051U	<0.00069U	<0.0029U	<0.072U	<0.42U
	Arochlor 1262	mg/kg	0.00096		<0U	<0.0051U	<0.00096U	<0.06U	<0.061U	<0.0094U	<0.0013U	<0.0054U	<0.1U	<0.6U
1	Total PCBs	mg/kg		50	0.65	1.785	0.0285	26.4	18.85	1.65	0.307	0.44	36	190
Metals	Aluminum	mg/kg	11		8100B	4200	3900	10,000	10,000	6000	9200	5800	5100F2	8200
	Antimony	mg/kg	0.13		2B	<0.13U	0.38J	1.5	2.2	4.9J	0.73J	3.5	1.4J	2.9
	Arsenic	mg/kg	0.56		24	8.2	4.8	19	22	12	15	27	20	33
1	Barium	mg/kg	11		130B	29B	31B	3000B	3000B	120J	140B	240B	96	280
	Beryllium	mg/kg	0.22		0.55B	0.16J	0.095J	1.2	1	0.33	0.54	0.37	0.4J	1.2
	Cadmium	mg/kg	0.28		2.2	0.093J	0.15J	1.8	2.2	2.5J	2.8	16	3.8F1	2.1
1	Calcium	mg/kg	280		46,000B	54,000B	150,000B	28,000B	23,000B	1500B	26,000B	4000B	9700F1	14,000
	Chromium (III+VI)	mg/kg	0.28		66	7.6	24	120	140	290F2	26	210	44	200
1	Cobalt	mg/kg	2.8		14	3.8	3.8J	25	30	8.1	13	14	6.3J	15
	Copper	mg/kg	1.4		240	27	56	450	550	210F2	120	250	180F2	610
	Iron	mg/kg	5.6		30,000B	14,000B	21,000B	55,000B	72,000B	29,000B	29,000B	88,000B	38,000F2	41,000
1	Lead	mg/kg	0.66		140	19	29	860	630	200F2	94	380	99F1,F2	360
	Magnesium	mg/kg	280		17,000B	5300	14,000	6900	2800	1300	2700	2400	1700	2700
	Manganese	mg/kg	0.84		420	190	210	550	560	350J	450	410	130F1	230
1	Mercury	mg/kg	0.0073		0.057	<0.0073U	0.13	0.38	0.24	0.066J+	0.082	0.11	0.2	1.1
1	Nickel	mg/kg	2.2		43	18	17	200	210	760	37	270	100F1	420
1	Potassium	mg/kg	280		780	410	270J	540J	370J	300	710	500	600J	710
1	Selenium	mg/kg	0.34		0.95	0.68	0.88	1.2J	1.6	0.63	1.4	1.8	2.3	3.6
1	Silver	mg/kg	0.025		<0U	<0.027U	<0.025U	0.38J	0.61	4.8J	0.067J	0.26J	1.3	6.7
	Sodium	mg/kg	78		23J	600	130J	430J	450	85J	250J	190J	410J	320J
1	Thallium	mg/kg	0.089		<0U	<0.099U	<0.45U	<0.11U	<0.12U	<0.089U	<0.12U	0.15J	<0.36U	<0.22U
1	Vanadium	mg/kg	2.8		24	10B	15B	26B	34B	21J	18B	29B	11	30
1	Zinc	mg/kg	1.2		1100B	58B	160B	790B	970B	420B	460B	880B	510	1000

MN0832/Table 5 - CB Sampling

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#### TABLE 5 COC CONCENTRATIONS IN EHS AND STCC CATCH BASINS

#### Former Sperry Remington Site Elmira, New York

				Location	CB-1	CB-4	CB-5	CB-6	CB-6	CB-9	CB-10	CB-11	CB-15	CB-15
				Field_ID	CB-1_07-24-12	CB-4	CB-5	CB-6	CB-DUP-01	CB-9	CB-10	CB-11	CB-15_01_111617	CB-15_02_111617
				Sample Date	7/24/2012	5/28/2015	5/28/2015	5/28/2015	5/28/2015	5/28/2015	5/28/2015	5/28/2015	11/16/2017	11/16/2017
			D	epth Interval (ft bgs)	0-1	0-1	0-1	0-1	0-1	0-1	0-1	0-1	0-0.17	0.17-0.83
Analyte Group	Constituent of Concern	Units	EQL	NYS Hazrdous Waste										
SVOCs	1,1-Biphenyl	malka	0.012		<0U	<0.078U	<0.075U	0.46J	0.64J	<0.073U.F1	<0.098U	<0.33U	<0.46U	0.72J
SVOCS	1,2,4,5-tetrachlorobenzene	mg/kg mg/kg	0.012		<00	<0.0780 <0.067U	<0.0750 <0.064U	<0.079U	<0.08U	<0.0730,F1 <0.062U	<0.0980 <0.083U	<0.330 <0.28U	<0.460	<0.4U
	1,4-Dioxane	mg/kg	0.016		~00	<0.1U	<0.0040 <0.096U	<0.0730 <0.12U	<0.000 <0.12U	<0.0020	<0.0000 <0.13U	<0.230 <0.43U	<0.88U	<0.83U
	2,3,4,6-tetrachlorophenol	mg/kg	0.0089		<0U	<0.10 <0.057U	<0.0500 <0.054U	<0.067U	<0.120 <0.068U	-0.0550	<0.130	<0.430 <0.24U	<0.380 <0.47U	<0.44U
	2,4,5-trichlorophenol	mg/kg	0.015		<00	<0.0970	<0.089U	<0.11U	<0.11U		<0.12U	<0.4U	<0.56U	<0.52U
	2,4,6-trichlorophenol	mg/kg	0.015		<00	<0.0340 <0.13U	<0.0000	<0.110 <0.16U	<0.110 <0.16U		<0.120	<0.56U	<0.510	<0.320
	2.4-dichlorophenol	mg/kg	0.0021		<00	<0.018U	<0.130	<0.021U	<0.100 <0.021U		<0.022U	<0.074U	<0.48U	<0.480 <0.45U
	2.4-dimethylphenol	mg/kg	0.022		<00	<0.14U	<0.13U	<0.16U	<0.17U	<0.13U.F1	<0.17U	<0.58U	<0.450	<0.43U
	2,4-dinitrophenol	mg/kg	0.16		<00	<10	<10	<1.2U	<1.3U	<0.130,11 <0.97U	<1.3U	<4.4U	<12U	<11U
	2,4-Dinitrotoluene	mg/kg	0.011		<0U	<0.071U	<0.068U	<0.084U	<0.085U		<0.088U	<0.3U	<0.77U	<0.73U
	2,6-dinitrotoluene	mg/kg	0.011		<00	<0.091U	<0.086U	<0.11U	<0.11U	<0.084U,F1	<0.11U	<0.38U	<0.41U	<0.38U
	2-chloronaphthalene	mg/kg	0.0029		<00	<0.0310	<0.0000	<0.022U	<0.022U		<0.023U	<0.077U	<0.38U	<0.36U
	2-chlorophenol	mg/kg	0.011		<0U	<0.072U	<0.069U	<0.085U	<0.087U	<0.067U	<0.089U	<0.3U	<0.42U	<0.4U
	2-methylnaphthalene	mg/kg	0.012		<00	<0.016U	0.2	0.69	0.9	3.1	0.2J	0.47J	<0.45U	2.8
	2-methylphenol	mg/kg	0.0096		<0U	<0.061U	<0.059U	<0.073U	<0.074U	<0.057U	<0.076U	<0.26U	<0.52U	<0.49U
	2-nitroaniline	mg/kg	0.062		<0U	<0.39U	<0.38U	<0.47U	<0.47U		<0.49U	<1.7U	<2U	<1.9U
	2-nitrophenol	mg/kg	0.015		<0U	<0.097U	<0.092U	<0.11U	<0.12U	<0.09U,F2	<0.12U	<0.41U	<0.43U	<0.4U
	3,3-Dichlorobenzidine	mg/kg	0.015		<0U	<0.093U	<0.089U	<0.11U	<0.11U		<0.12U	<0.39U	<2.4U	<2.3U
	3-nitroaniline	mg/kg	0.057		<0U	<0.36U	<0.35U	<0.43U	<0.44U		<0.45U	<1.5U	<1.7U	<1.6U
	4,6-Dinitro-2-methylphenol	mg/kg	0.055		<0U	<0.35U	<0.34U	<0.42U	<0.43U		<0.44U	<1.5U	<21U	<20U
	4-bromophenyl phenyl ether	mg/kg	0.012		<0U	<0.077U	<0.073U	<0.091U	<0.092U		<0.095U	<0.32U	<0.56U	<0.53U
	4-chloro-3-methylphenol	mg/kg	0.013		<0U	<0.081U	<0.077U	<0.096U	<0.097U	-	<0.1U	<0.34U	<0.61U	<0.58U
	4-chloroaniline		0.011		<0U	<0.07U	<0.067U	<0.083U	<0.085U		<0.088U	<0.3U	<0.33U	<0.31U
	4-chlorophenyl phenyl ether	mg/kg	0.015		<0U	<0.098U	<0.093U	<0.12U	<0.12U	<0.09U,F1,F2	<0.12U	<0.41U	<0.42U	<0.4U
	4-methylphenol	mg/kg	0.055		<0U	0.2J	<0.082U	<0.1U	<0.1U	<0.08U,F1	0.22J	<0.36U	<0.52U	<0.49U
	4-nitroaniline	mg/kg	0.056		<0U	<0.36U	<0.34U	<0.42U	<0.43U	-	<0.44U	<1.5U	<2.1U	<2U
	4-nitrophenol	mg/kg	0.05		<0U	<0.32U	<0.31U	<0.38U	<0.39U		<0.4U	<1.4U	<6.1U	<5.8U
	Acenaphthene	mg/kg	0.0026		<0U	<0.017U	0.91	0.84	0.69	<0.016U,F1	0.15J	0.84	<0.39U	9.2
	Acenaphthylene	mg/kg	0.0032		0.41J	<0.02U	0.9	0.28J	0.57J	0.39	0.44	0.49J	0.75J	2.6
	Acetophenone	mg/kg	0.011		<0U	<0.072U	<0.069U	<0.086U	<0.087U	<0.067U,F1	<0.09U	<0.3U	1.8J	<0.38U
	Anthracene	mg/kg	0.0027		0.51J	<0.017U	5.4	1.1	1	0.58J	0.82	2	1.3	19
	Atrazine	mg/kg	0.013		<0UJ	<0.086U	<0.082U	<0.1U	<0.1U	<0.079U,F1	<0.11U	<0.36U	<0.81U	<0.76U
	Benz(a)anthracene	mg/kg	0.028		1.9J	0.22	12	3.2	2.5	0.77J	1.4	3.2	3.9	38
	Benzaldehyde	mg/kg	0.021		<0U	<0.13UJ	<0.13UJ	<0.16UJ	<0.16UJ	<0.12UJ	<0.16UJ	<0.56UJ	<0.38U	<0.36U
	Benzo(a) pyrene	mg/kg	0.028		1.9J	0.28	11	2.6	2.4	0.72J	1.1	2.5	3.3	27
	Benzo(b)fluoranthene	mg/kg	0.028		2.7	0.37	13	3.2	2.9	0.87J	1.3	3.5	4.5	35
	Benzo(g,h,i)perylene	mg/kg	0.028		2J	0.32	11	2.5	2.5	0.8J	1	2.4	2.8	20
	Benzo(k)fluoranthene	mg/kg	0.026		<0U	0.14J	5.5	1.2	1.2	0.46	0.59	0.79	1J	14

MN0832/Table 5 - CB Sampling

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## TABLE 5 COC CONCENTRATIONS IN EHS AND STCC CATCH BASINS

### Former Sperry Remington Site Elmira, New York

				Location	CB-1	CB-4	CB-5	CB-6	CB-6	CB-9	CB-10	CB-11	CB-15	CB-15
				Field_ID	CB-1_07-24-12	CB-4	CB-5	CB-6	CB-DUP-01	CB-9	CB-10	CB-11	CB-15_01_111617	CB-15_02_111617
				Sample Date	7/24/2012	5/28/2015	5/28/2015	5/28/2015	5/28/2015	5/28/2015	5/28/2015	5/28/2015	11/16/2017	11/16/2017
			C	epth Interval (ft bgs)	0-1	0-1	0-1	0-1	0-1	0-1	0-1	0-1	0-0.17	0.17-0.83
Analyte Group	Constituent of Concern	Units	EQL	NYS Hazrdous Waste										
SVOCs	Bis(2-chloroethoxy) methane	mg/kg	0.0091		<0U	<0.058U	<0.055U	<0.069U	<0.07U	<0.054U,F1	<0.072U	<0.24U	<0.34U	<0.32U
	Bis(2-chloroethyl)ether	mg/kg	0.0037		<0U	<0.024U	<0.022U	<0.028U	<0.028U	<0.022U	<0.029U	<0.1U	<0.35U	<0.33U
1	Bis(2-chloroisopropyl) ether	mg/kg	0.003		<0U	<0.019U	<0.018U	<0.022U	<0.023U	<0.018U	<0.024U	<0.08U	<0.38U	<0.36U
1	Bis(2-ethylhexyl) phthalate	mg/kg	0.022		<0U	<0.14U	2.8	0.68J	0.31J	0.43J	<0.18U	<0.6U	<3.9U	<3.7U
1	Butyl benzyl phthalate	mg/kg	0.019		<0U	<0.12U	<0.11U	<0.14U	<0.14U	0.3J	<0.15U	<0.51U	<4.3U	<4.1U
1	Caprolactam	mg/kg	0.1		<0U	<0.66U	<0.63U	<0.79U	<0.8U	<0.61U	<0.83U	<2.8U	<2.8U	<2.6U
1	Carbazole	mg/kg	0.0025		<0U	<0.016U	2.2	1.1	0.87	<0.015U,F1	0.32	0.87	<0.5U	16
	Chrysene	mg/kg	0.028		1.7J	0.39	13	3.5	2.9	0.92J	1.4	3.2	3.4	40
1	Dibenz(a,h)anthracene	mg/kg	0.0031		0.24J	<0.02U	2.3	0.61	0.53	0.19	0.26	0.63J	<0.48U	6.5
1	Dibenzofuran	mg/kg	0.014		<0U	<0.087U	0.58J	1.1	1.2	<0.08U,F1	0.17J	0.62J	<0.47U	5.8
	Diethylphthalate	mg/kg	0.015		<0U	<0.096U	<0.091U	<0.11U	<0.12U	<0.089U,F1,F2	<0.12U	<0.41U	0.75J,B	<0.49U
	Dimethyl phthalate	mg/kg	0.015		<0U	<0.096U	<0.091U	<0.11U	<0.12U	<0.089U,F1,F2	<0.12U	<0.4U	<0.41U	<0.38U
1	Di-n-butyl phthalate	mg/kg	0.017		<0U	<0.11U	<0.1U	<0.13U	<0.13U	0.19J	<0.14U	<0.46U	<0.46U	<0.44U
	Di-n-octyl phthalate	mg/kg	0.015		<0U	<0.093U	<0.088U	<0.11U	<0.11U	<0.086U,F1	<0.12U	<0.39U	<0.69U	<0.65U
1	Fluoranthene	mg/kg	0.028		3.1	0.91	33	8.1	6.8	1.7	3.2	7	7.8	110
	Fluorene	mg/kg	0.0036		<0U	<0.023U	1.6	0.75	0.7	0.88J	0.36	1	0.5J	9.2
1	Hexachlorobenzene	mg/kg	0.0029		<0U	<0.019UJ	<0.018UJ	<0.022UJ	<0.023UJ	<0.017UJ	<0.023UJ	<0.079UJ	<0.47U	<0.44U
1	Hexachlorobutadiene	mg/kg	0.0031		<0U	<0.02UJ	<0.019UJ	<0.023UJ	<0.024UJ	<0.018UJ	<0.024UJ	<0.083UJ	<0.37U	<0.35U
1	Hexachlorocyclopentadiene	mg/kg	0.015		<0U	<0.095U	<0.09U	<0.11U	<0.11U	-	<0.12U	<0.4U	<0.5U	<0.47U
1	Hexachloroethane	mg/kg	0.0099		<0U	<0.063U	<0.06U	<0.075U	<0.076U		<0.079U	<0.27U	<0.42U	<0.4U
	Indeno(1,2,3-c,d)pyrene	mg/kg	0.028		1.5J	0.26	9	1.9	2	0.65J	0.87	2	2.6	19
1	Isophorone	mg/kg	0.01		<0U	<0.066U	<0.063U	<0.079U	<0.08U	<0.061U,F1	<0.083U	<0.28U	<0.32U	<0.31U
1	Naphthalene	mg/kg	0.0097		<0U	<0.015U	0.17	0.59	0.61	0.5J	0.21J	0.73J	<0.42U	7.2
	Nitrobenzene	mg/kg	0.011		<0U	<0.073U	<0.07U	<0.087U	<0.088U	<0.068U,F1	<0.091U	<0.31U	<0.45U	<0.42U
1	N-nitrosodi-n-propylamine	mg/kg	0.0032		<0U	<0.021U	<0.02U	<0.024U	<0.025U	<0.019U,F1	<0.026U	<0.087U	<0.4U	<0.37U
1	n-Nitrosodiphenylamine	mg/kg	0.013		<0U	<0.081U	<0.078U	<0.096U	<0.098U		<0.1U	<0.34U	<0.92U	<0.87U
1	Pentachlorophenol	mg/kg	0.012		<0U	<0.079U	<0.075U	<0.093U	<0.095U		<0.098U	<0.33U	<11U	<10U
1	Phenanthrene	mg/kg	0.0044		1.6J	0.51	19	6.9	5.1	1.8	2.2	5.6	3.9	94
1	Phenol	mg/kg	0.0033		<0U	<0.021U	<0.02U	<0.025U	<0.025U	<0.019U	<0.026U	<0.088U	<0.79U	<0.75U
	Pyrene	mg/kg	0.028		2.4	0.61	20	5.3	4	1.7	2	4.1	6.2	76

 Notes
 .

 1.
 Analytes with no detections are not shown. See analytical reports for complete results.

 mg/kg
 milligrams per kilogram

 U
 Non-Detect

 FI
 MS and/or MSD Recovery is outside acceptance limits.

 F2
 MSSMD RPD exceeds control limits

 B
 Compound was found in the blank and sample.

 Total PCB concentrations detected above New York State hazardous waste threshold (6 NYCRR Part 371.4 (e)) are presented in dark grey

MN0832/Table 5 - CB Sampling

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## TABLE 6 CHARACTERIZATION OF OS2 FINE -GRAINED MATERIAL

Former Sperry Remington Site Elmire, New York

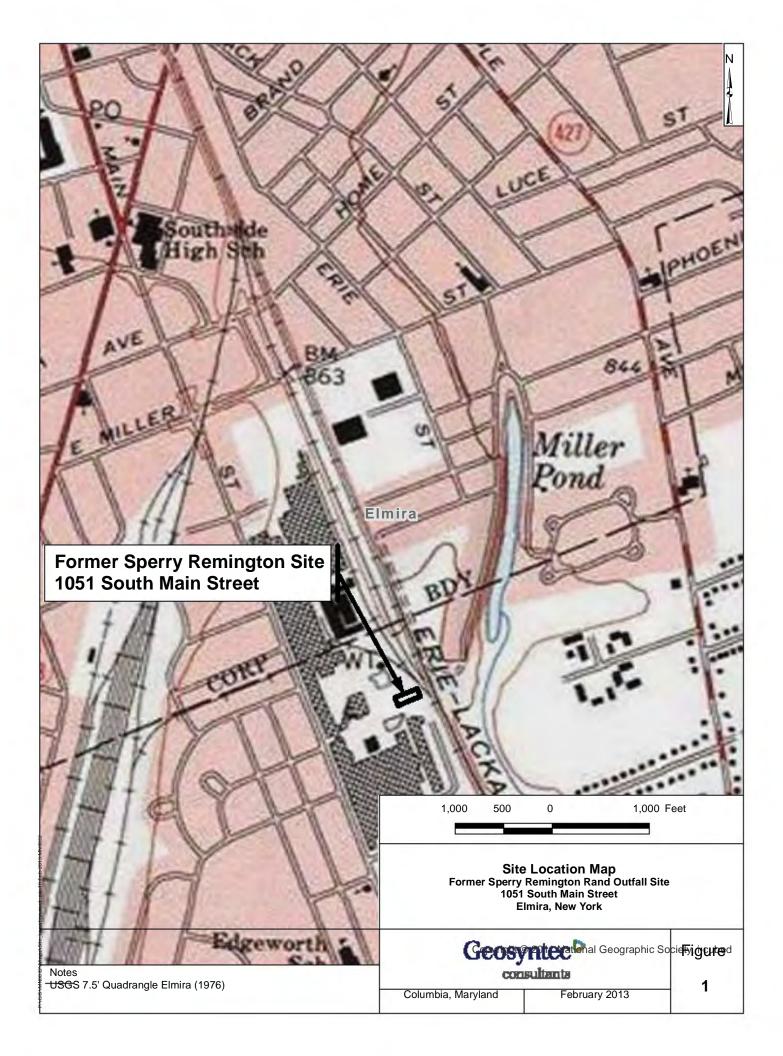
				Location	OS-1	OS2-3	OS2-4	OS-2	OS-2
				Field_ID	OS-1	OS2-3_07-31-12	OS2-4_07-31-12		OS-3
				Sample Date Depth Interval (ft bgs)	8/24/2011 11.5'-12'	7/31/2012 Composite	7/31/2012 Composite	8/24/2011 11.5'-12'	8/24/201 11.5'-12'
				Depth interval (it bgs)	11.3-12	composite	composite	11.3-12	11.3 -12
Group	Analytte	Units	EQL	Hazardous Waste Characertistics Threshold					
Group	Moisture Content	%	EQL	Inresnoid	49	65	62	43	43
Corrosivity	pН	pH Units	0.1	≤2 or ≥12.5	-	6.24J	6.47J	-	-
Reacitivity	Cyanide Total	mg/kg	0.44		13	3.4	3.8	5.7	6.5
	Sulphide	mg/kg	79 0	140	-	850	540	-	-
Ignitablity	Flash Point Arochlor 1016	oF	0 0.54	140	- ND	>140 ND	>140 ND	- ND	- ND
	Arochlor 1016 Arochlor 1221	mg/kg mg/kg	0.54		ND	ND	ND	ND	ND ND
	Arochlor 1232	mg/kg	0.54		ND	ND	ND	ND	ND
	Arochlor 1242	mg/kg	0.54		ND	29J	94J	ND	ND
Polychlorinated	Arochlor 1248	mg/kg	0.54		22	ND	ND	16	14
Biphenyls	Arochlor 1254	mg/kg	0.54		ND	30J	140J	ND	ND
	Arochlor 1260	mg/kg	0.54		ND	ND	ND	ND	ND
	Arochlor 1268	mg/kg	0.54		ND	ND	ND	ND	ND
	Arochlor 1262	mg/kg	0.54		ND	ND	ND	ND	ND
	Total PCBs	mg/kg		50	22	59J	234J	16	14
	Arsenic	mg/L	0.05	5		0.006J	0.009J		
	Barium	mg/L	0.2	100		0.72B	0.76B		
	Cadmium Chromium	mg/L	0.05	1 5		0.054 0.006J	0.072 0.008J		
TCLP Metals	Lead	mg/L mg/L	0.05	5		0.3	0.42		
	Mercury	mg/L	0.0002	0.2		ND	ND		
	Selenium	mg/L	0.05	1		ND	ND		
	Silver	mg/L	0.05	5		ND	ND	1	
	Arsenic	mg/kg	0.86		40	-	-	33	36
	Barium	mg/kg	17		540J	-	-	310J	400J
	Cadmium	mg/kg	0.43		1.7	-	-	2.3	2.4
Total Metals	Chromium	mg/kg	0.43		400J	-	-	400J	310J
	Lead	mg/kg	0.26		430J	-	-	430J	630J
	Mercury	mg/kg	0.029		1J	-	-	3.6J	1.4J
	Selenium	mg/kg	0.43		4.7	-	-	1.9	2
	Silver	mg/kg	0.43	7.500	2.2	-	-	1.4	1.6
	1,4-dichlorobenzene	μg/L	50 50	7,500		ND	ND		
	2,4,5-trichlorophenol 2,4,6-trichlorophenol	μg/L μg/L	50	400,000 400,000		ND ND	ND ND		
	2,4-Dinitrotoluene	μg/L	50	7,500		ND	ND		
	2-methylphenol	μg/L	50	4,200,000		ND	ND		
	Cresol Total	mg/L	0.05	4,200		ND	ND		
TCLP SVOCs	Hexachlorobenzene	μg/L	10	30,130		ND	ND		
	Hexachlorobutadiene	μg/L	10	500		ND	ND		
	Hexachloroethane	μg/L	50	30,130		ND	ND		
	Nitrobenzene	μg/L	100	500		ND	ND		
	Pentachlorophenol	μg/L	50	3,000		ND	ND		
	Pyridine	μg/L	50	2,000		ND	ND		
	1,4-dichlorobenzene	mg/kg	0.0096		ND	-	-	ND	ND
	2,4,5-trichlorophenol	mg/kg	8.6		ND ND	-	-	ND ND	ND ND
	2,4,6-trichlorophenol 2,4-Dinitrotoluene	mg/kg mg/kg	8.6 8.6		ND	-	-	ND	ND
	2-methylphenol	mg/kg	8.6		ND		-	ND	ND
Total SVOCs	3-&4-methylphenol	mg/kg	8.6		ND	-	-	ND	ND
	Hexachlorobutadiene	mg/kg	1.7		ND	-	-	ND	ND
	Hexachloroethane	mg/kg	8.6		ND	-	-	ND	ND
	Nitrobenzene	mg/kg	17		ND	-		ND	ND
	Pentachlorophenol	mg/kg	8.6		ND	-	-	ND	ND
	1,1-dichloroethene	μg/L	200	700		ND	ND		
	1,2-dichloroethane	μg/L	200	500		ND	ND		
	Methyl Ethyl Ketone	μg/L	200	200,000		ND	ND		
	Benzene Carbon totrachlorido	μg/L	200	500		ND	ND		
TCLP VOCs	Carbon tetrachloride	μg/L	200 200	500 100,000		ND ND	ND ND	<u> </u>	
	Chlorobenzene Chloroform	μg/L μg/L	200	6,000		ND	ND	1	
	Trichloroethene	μg/L	200	500		ND	ND	1	
	Tetrachloroethene	μg/L	200	700		ND	ND		
	Vinyl chloride	μg/L	200	200		ND	ND		
	1,1-dichloroethene	mg/kg	0.0096		0.049J	-	-	ND	ND
	1,2-dichloroethane	mg/kg	0.0096		ND	-	-	ND	ND
	Methyl Ethyl Ketone	mg/kg	0.038		ND	-	-	0.098	0.12
	Benzene	mg/kg	0.0096		ND	-	-	ND	0.002J
Fotal VOCs	Carbon tetrachloride	mg/kg	0.0096		ND	-	-	ND	ND
	Chlorobenzene	mg/kg	0.0096		ND	-	-	ND	ND
	Chloroform	mg/kg	0.0096		ND	-	-	ND	ND
	Trichloroethene Tetrachloroethene	mg/kg	0.0096		1.4 ND	-	-	ND ND	ND ND
	Vinyl chloride	mg/kg mg/kg	0.0096		0.23J	-	-	0.1	0.12
	chlordane	μg/L	5	30	0.200	ND	ND		5.12
	Endrin	μg/L	0.5	20		ND	ND		
	g-BHC (Lindane)	μg/L	0.5	400		ND	ND	1	
CID Dection	Heptachlor	μg/L	0.5	8		ND	ND		
CLP Pesticides and Ierbicides	Heptachlor epoxide	μg/L	0.5	8		ND	ND		
ierbiciues	Methoxychlor	μg/L	1	10,000		ND	ND		
	Toxaphene	mg/L	0.02	500		ND	ND		
	2,4,5-TP (Silvex)	mg/L	0.01	10		ND	ND		
	2,4-D	mg/L	0.04	10		ND	ND		
	chlordane	mg/kg	0.37		ND	-	-	ND	ND
	Endrin	mg/kg	0.037		0.11J	-	-	0.061J	0.062J
tered December 1	g-BHC (Lindane)	mg/kg	0.037		ND	-	-	ND	ND
Total Pesticides	Heptachlor Hoptachlor opovido	mg/kg	0.037		ND	-	-	ND 0.21	ND
	Heptachlor epoxide	mg/kg	0.037		0.42	-	-	0.3J	0.29J
	Methoxychlor	mg/kg	0.073		0.051J ND	-	-	0.032J	0.03J

Notes: J - estimated value ND - not detected - - not analyzed mg/kg - milligram per kilogram mg/L - milligram per liter µg/L - microgram per liter

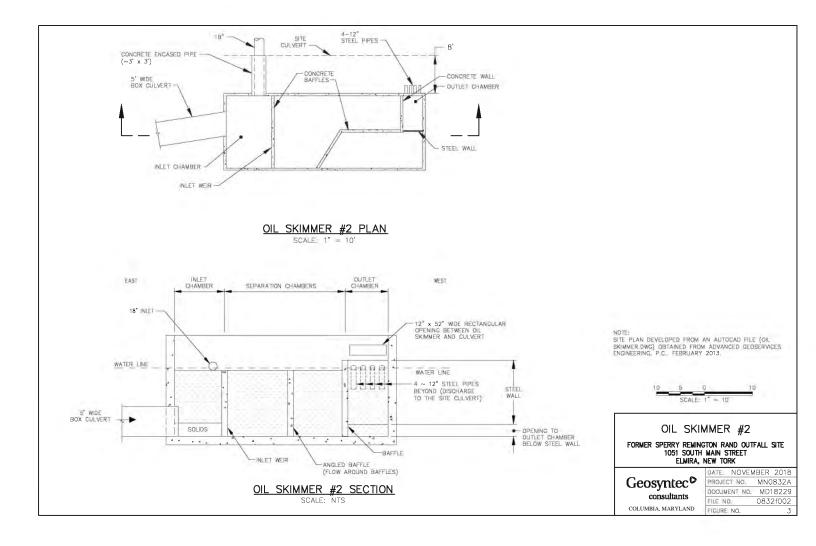
ft bgs - feet below ground surface PCBs - polychlorinated biphenyls SVOCs - semi-volatile Organic Compounds VOCs - volatile organic compounds TCLP - toxicity characteristic leaching procedure

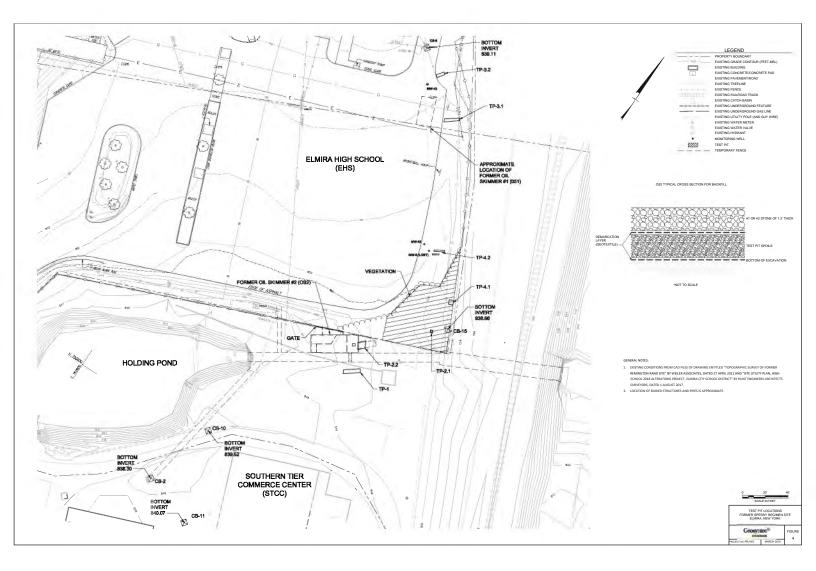
Beech and Bonaparte

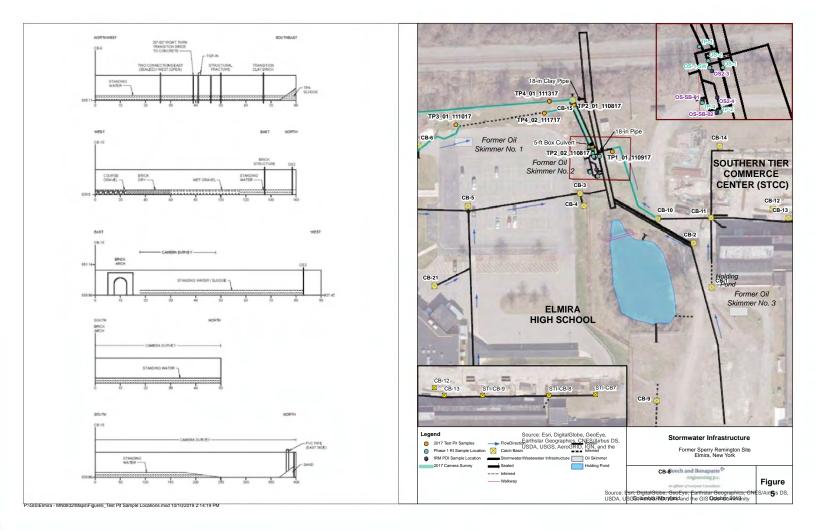
# FIGURES

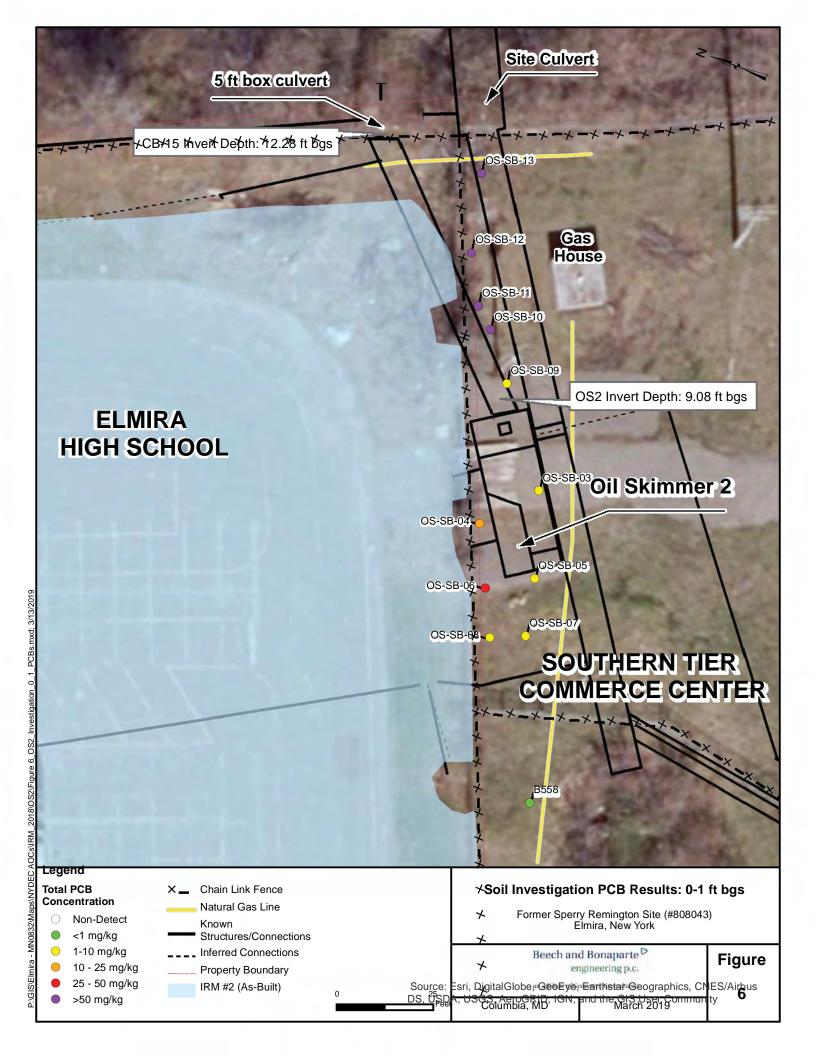


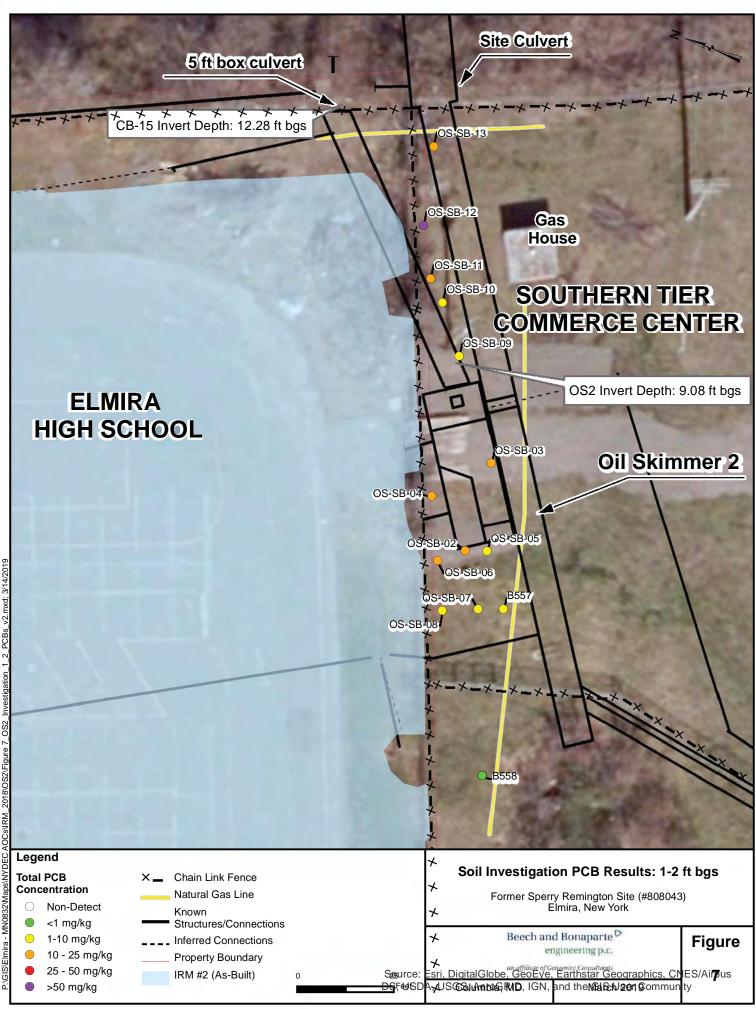




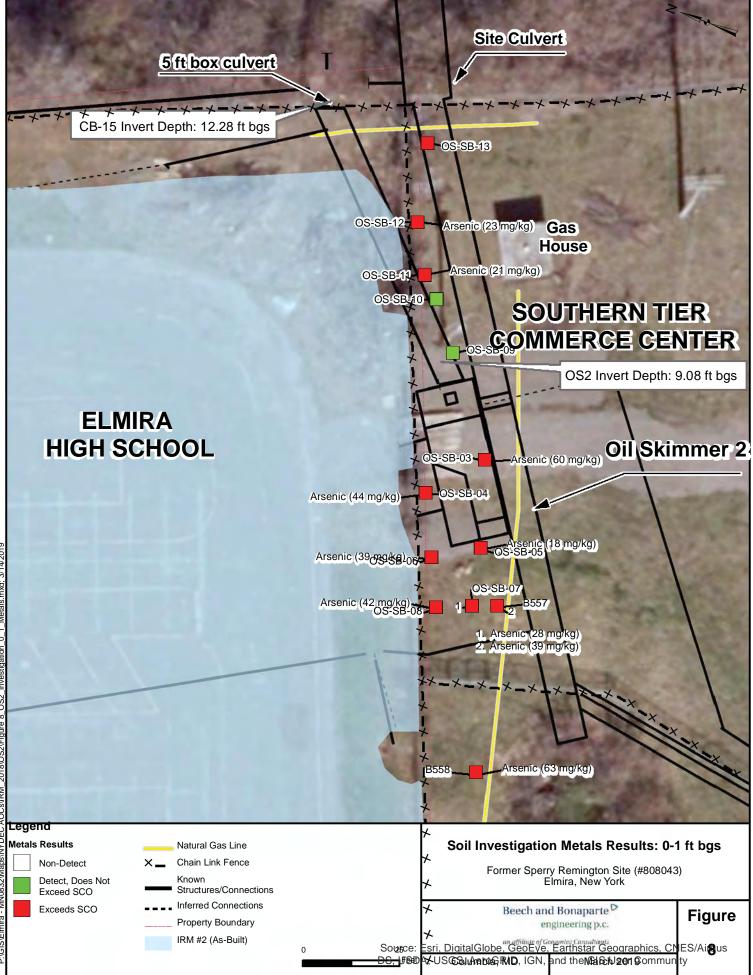


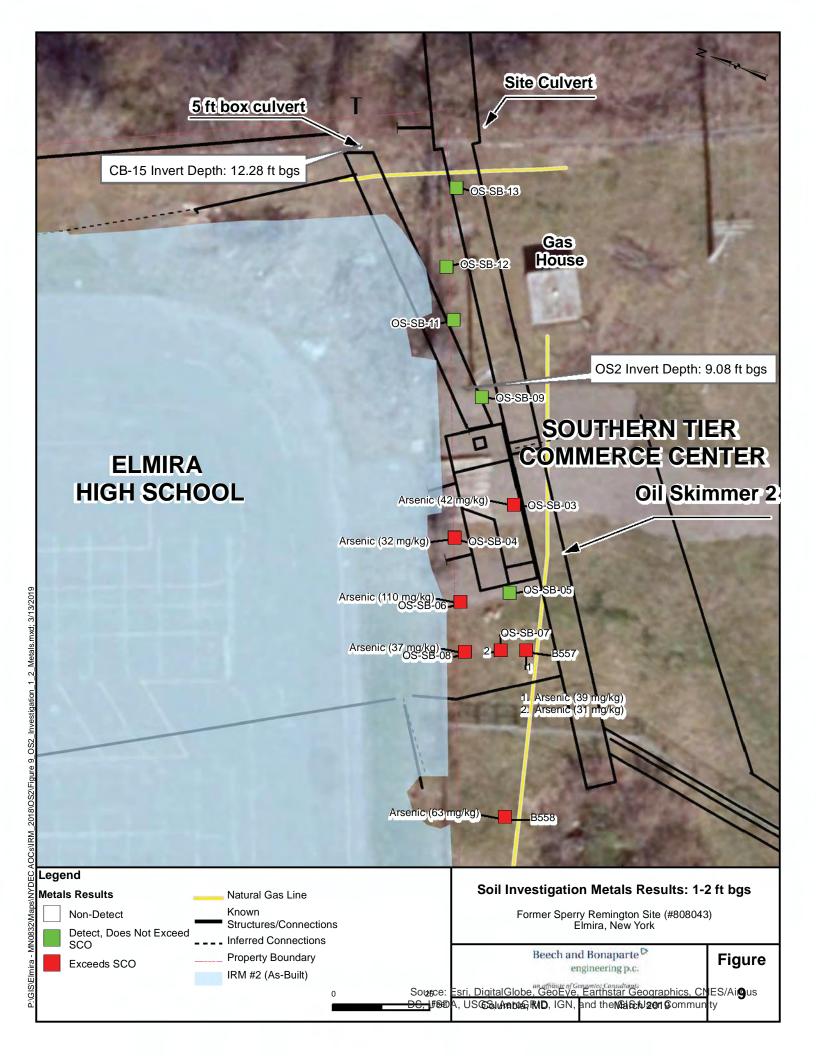


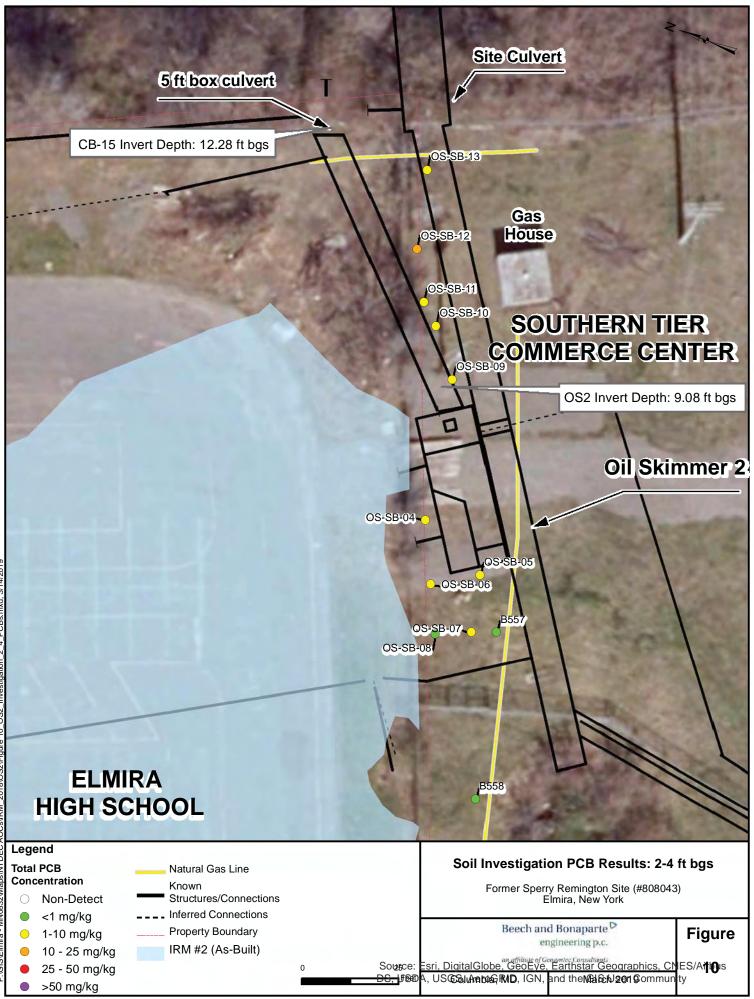


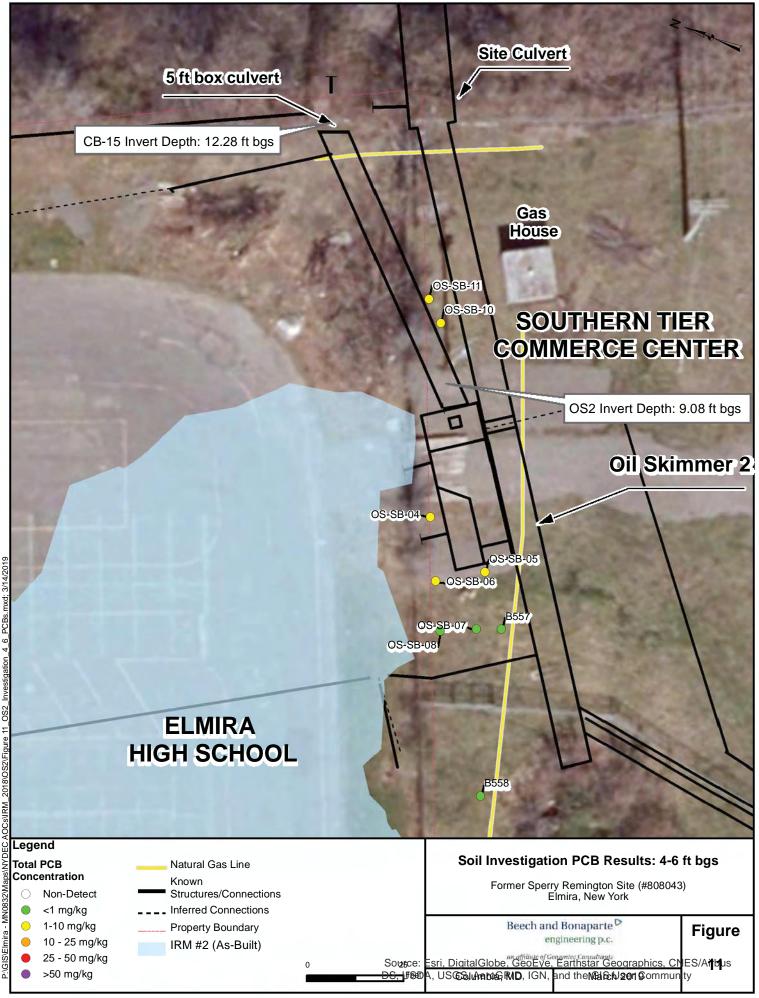


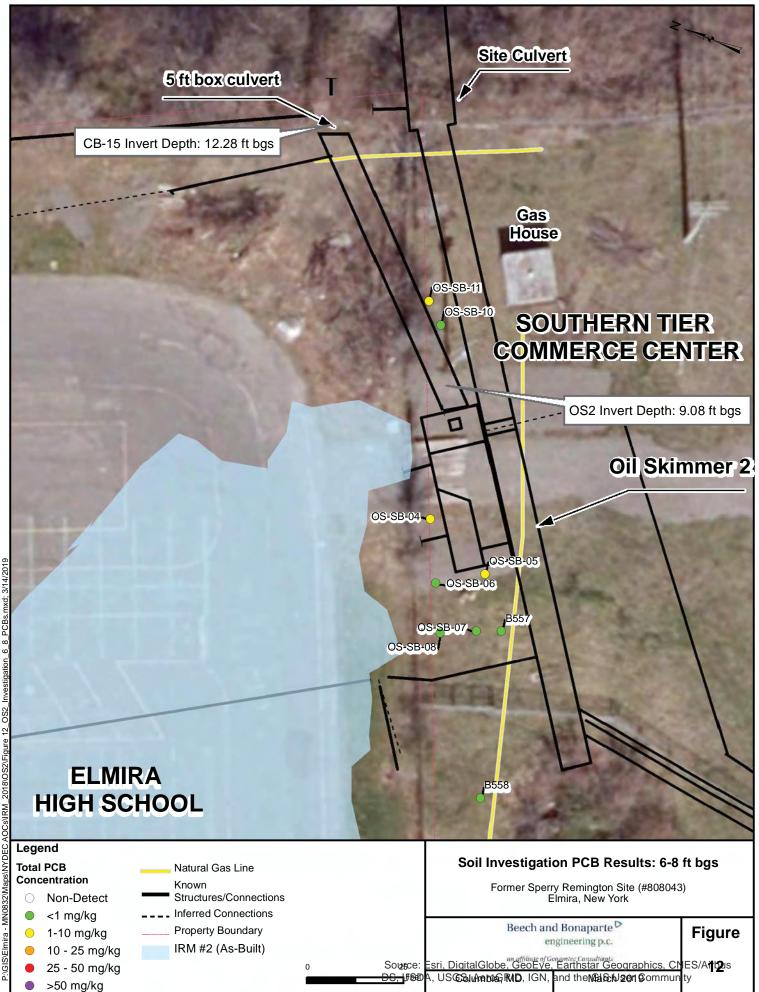
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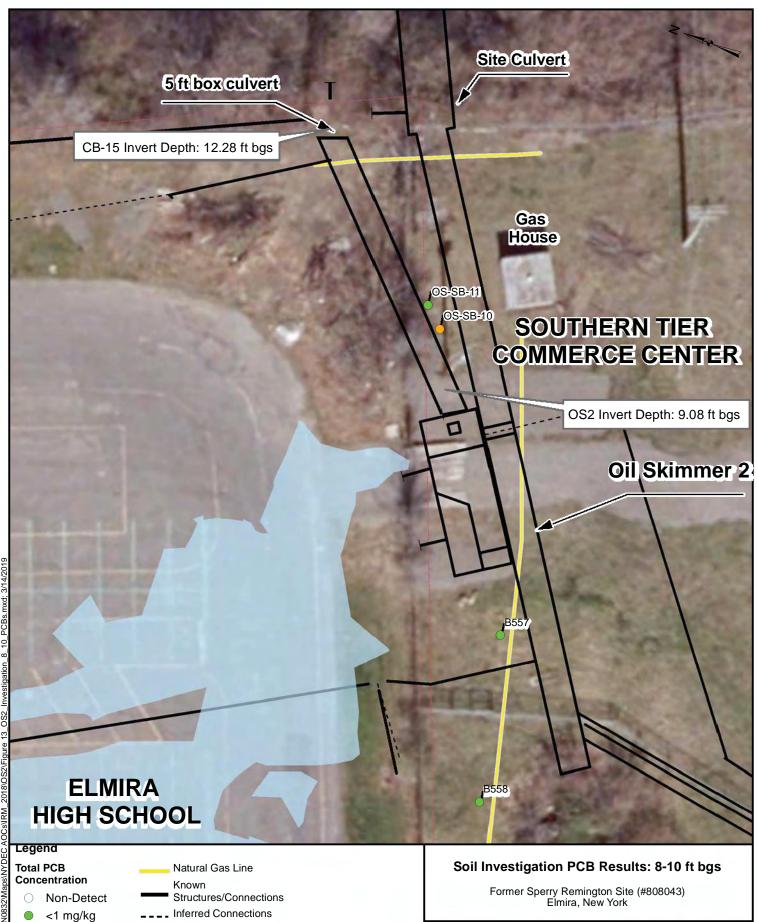












Beech and Bonaparte engineering p.c.

Figure

Source: Esri, DigitalGlobe, GeoEve, Earthstar Geographics, CNES/A1133 IS BOOM A, USCOMMANNA MID, IGN, and the Match 201 Sommunity

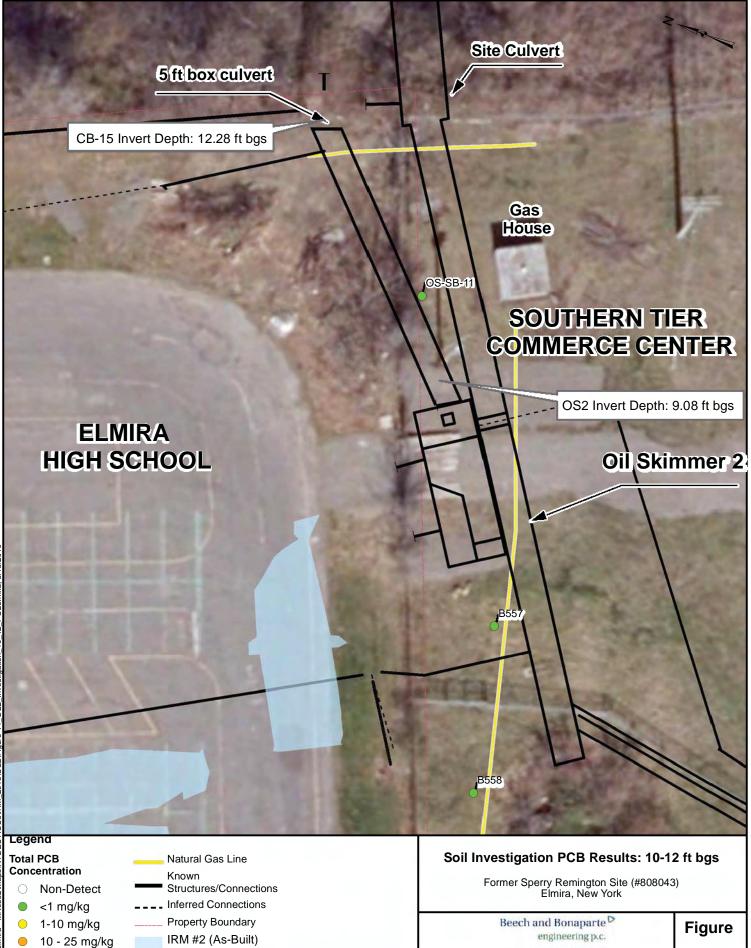
1-10 mg/kg

10 - 25 mg/kg

25 - 50 mg/kg >50 mg/kg

Property Boundary

IRM #2 (As-Built)

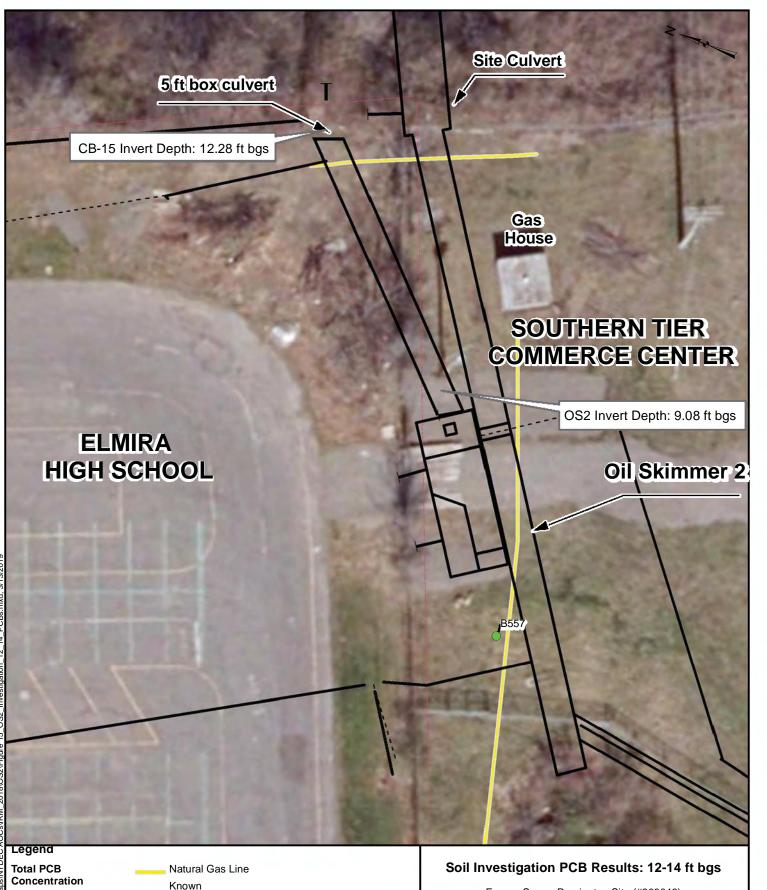


25 - 50 mg/kg

>50 mg/kg

2/13/201

Source: Esri, DigitalGlobe, GeoEve, Earthstar Geographics, CNES/Affordus <u>BC, I</u>FBDA, USCOMABIG, RND, IGN, and the Match 201 Sommunity



Former Sperry Remington Site (#808043) Elmira, New York

Beech and Bonaparte P engineering p.c.

Figure

an affiliate of Cooperation Consultants Source: Esri, DigitalGlobe, GeoEve, Earthstar Geographics, CNES/A115, ISB — DE, ரச்சிA, USC து Antria MD, IGN, and the Match 2019 Community

Non-Detect

1-10 mg/kg

10 - 25 mg/kg

25 - 50 mg/kg

>50 mg/kg

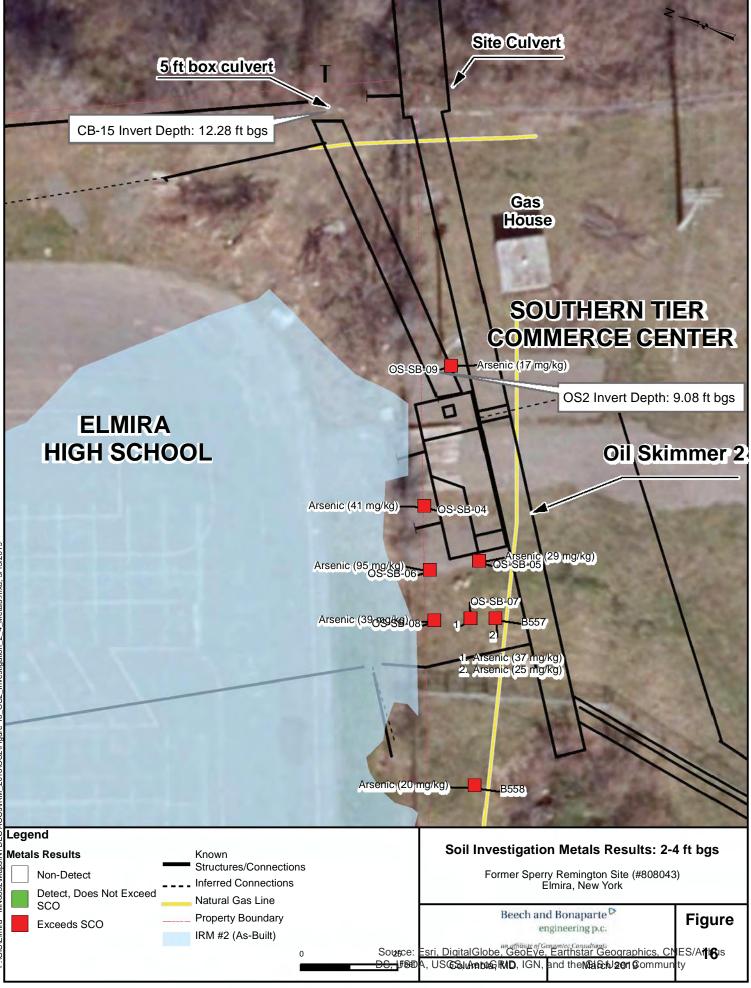
<1 mg/kg

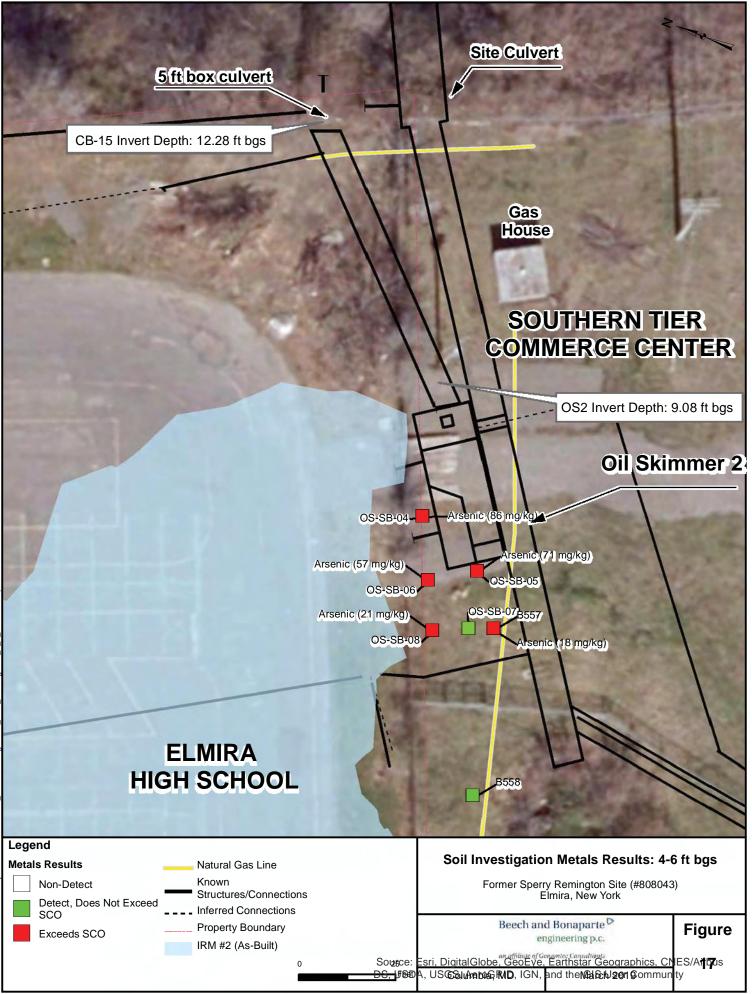
Structures/Connections

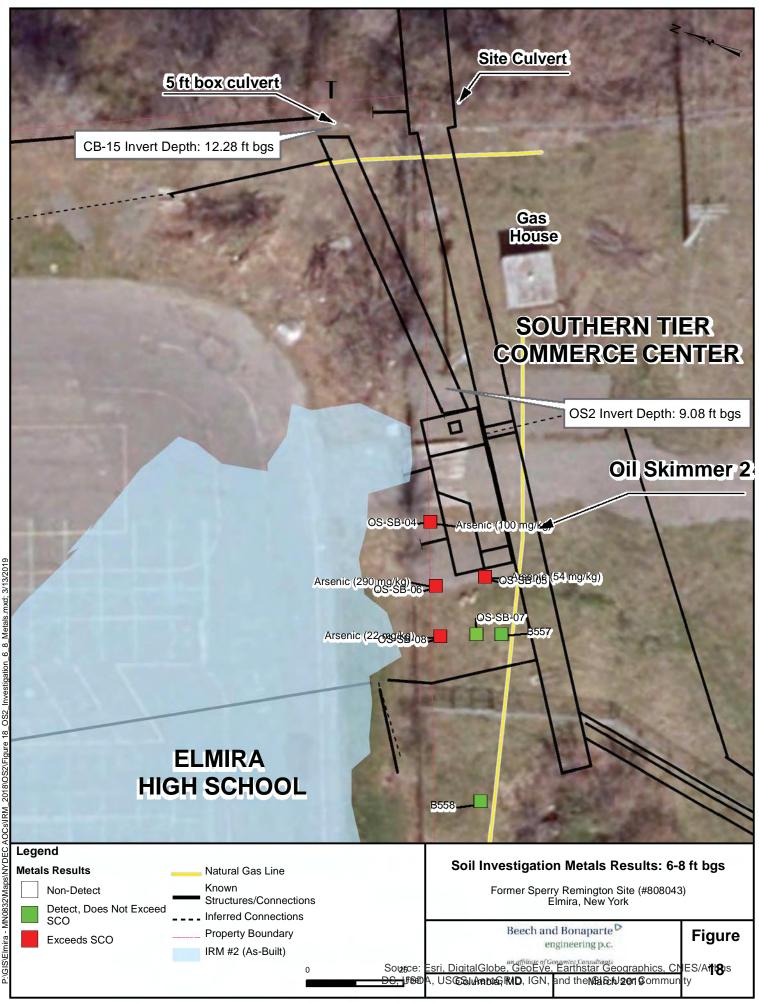
Inferred Connections

Property Boundary

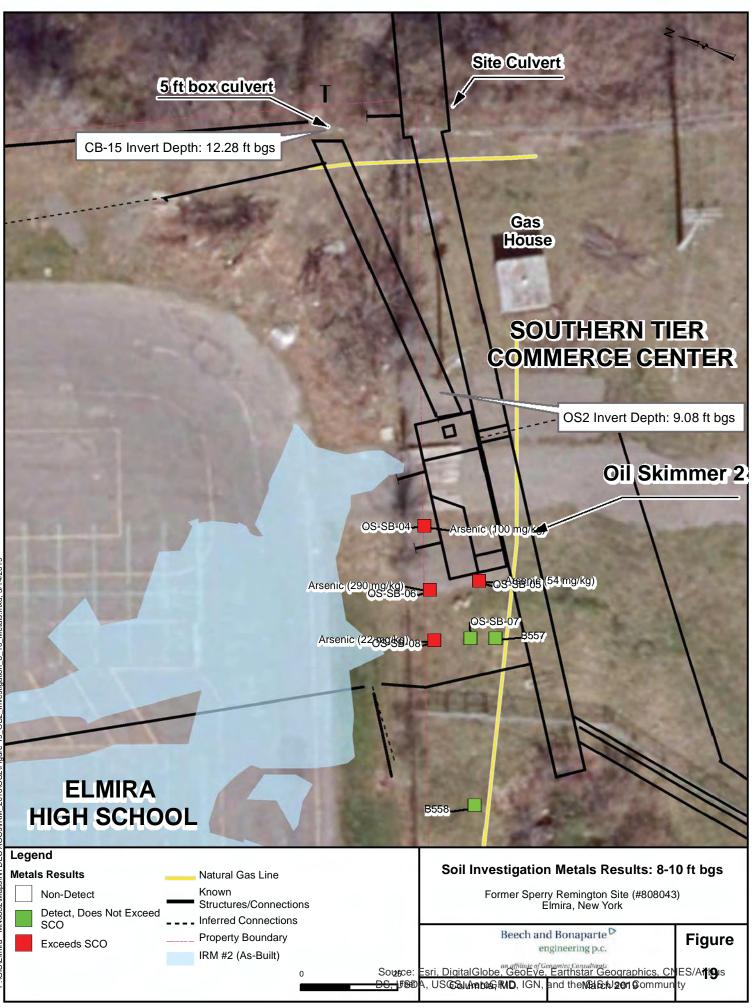
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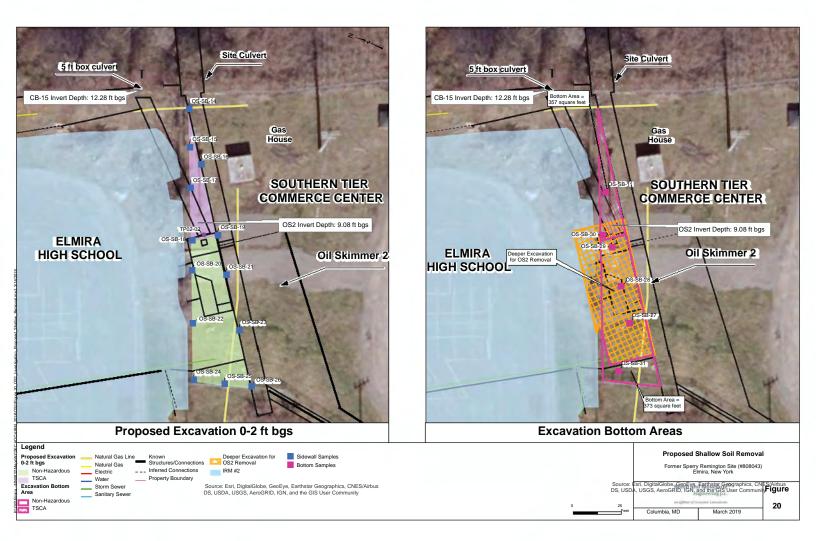


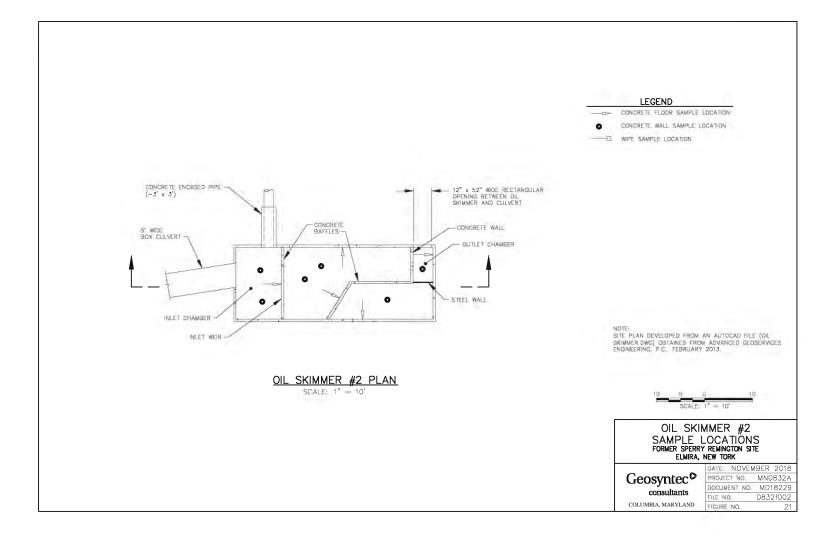




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# Appendix A NYSDEC Comments

New York State Department of Environmental Conservation Division of Environmental Remediation, Region 8 6274 East Avon-Lima Road, Avon, New York 14414-9519 Phone: (585) 226-5353 • Fax: (585) 226-8139 Website: www.dec.ny.gov



June 23, 2014

Mr. Kevin Krueger, PE Unisys Corporation Corporate Environmental Affairs 3199 Pilot Knob Road Eagan, NY 55121

Re: Former Sperry Remington Site (#808043) Interim Remedial Measure Work Plan City of Elmira, Chemung County, NY

Dear Mr. Krueger:

The Department has completed its review of the document entitled "Interim Remedial Measure Work Plan" agency review draft dated April 2014 and has determined that the work plan does not substantially addresses the requirements of the Superfund Order. Please address the following comments in a revised submission:

- Please provide a response to the Department's specific comments / limitations / deficiencies of 5-20-13 (attached).
- 2. The Department will not authorize the disconnection or closure of any drainage collection system (former combined industrial & storm sewer) connected to OS-2 or the Site Box Culvert until the full extent of each system is verified by physical or video inspection, the system function, condition and sediment are characterized and an alternative plan to modify is accepted by the Department, property owners and any other agency with regulatory jurisdiction.
- 3. Summary statements in section 1.2 regarding pipe inlet connections to OS-2 being dry is not accurate and is inconsistent with Department field observations and Unisys report documentation/observation (attached). The Geosyntec depiction of these pipe connections in Figure 6 of the IRMPDI Report is inaccurate and inconsistent with field observations as well as previous submissions by Advanced Geoservices (attached).
- 4. A summary statement in section 1.2 regarding "data" indicating that inlet connections to OS2 are inactive is inconsistent with reporting and should be removed. No video data was collected during the IRMPDI to confirm these connections and dye testing data also did not confirm connection. What "data" is this statement referring to?
- 5. A statement in section 1.3 regarding the "functionality of the site storm sewer system" should be removed and addressed in accordance with #2 above.
- The IRM work plan provides insufficient scope of work for "additional storm sewer inspections" to address #2 above.
- 7. Unisys will provide a scope of work that includes confined space entry and a plan to address debris / accessibility issues that limited sewer inspection during the IRMPDI.
- 8. A statement in Section 2.1 regarding the "no other connections to the southern..." is misleading and should be removed or modified and the statement of "no further investigation of connections between CB-10 and OS2" is not acceptable. The geometric configuration or alignment of piping assumed to connect OS2 to CB-10 would require a 90 degree change of direction. Because of this configuration, it is improbable that a direct piping connection exists without additional intermediary structures or pipes.
- 9. The Appendix B Construction Plans to "seal and grout" decommission the 18" pipe inlet on the south side of OS2 is unacceptable. All piping connections to OS2 are documented to have transported industrial waste. No pipe or structure will be decommissioned without appropriate characterization of it's contents, it's structural integrity and potential release of contaminants to the environment evaluated in accordance with DER-10. Cleaning of pipes and

structures may also be required prior to decommissioning.

- 10. The 18" pipe outfall from CB-10 identified as "steel" needs to be verified because CB-10 photos show bell end of pipe consistent with RCP or clay. Please provide video of this pipe section. Department observations of a curving alignment seen during the camera survey would be consistent with clay or concrete pipe and not steel.
- 11. The Appendix B Construction Plans to import backfill material must be consistent with DER-10 guidance.
- 12. The Appendix B Construction Plan pg. 5 of 5 erosion and sediment notes #11-14 regarding the handling of water and sediments (potentially contaminated) should be removed or appropriately modified.
- The Appendix B Construction Plan depicts a permeable sediment stabilization area and does not address the containment of potentially contaminated sediment leachate.
- 14. All IRM work plans and drawings must be signed and sealed by a NYS Professional Engineer in accordance with the Consent Order.
- 15. The Department review of the IRMWP does not include the evaluation of the structural or hydraulic specifications presented in this plan. It will be the responsibility of the owner's or other regulatory jurisdictions to evaluate and accept these specifications.
- 16. Section 2.3 of the IRMWP has cited 40 CFR 761, Section 61 regarding the closure of OS2 and specifically identified "capping" as a disposal option for leaving PCB remediation waste up to 100 ppm on site. To facilitate this option, Unisys must document the property owner's consent to filing a deed restriction that will in perpetuity notify any potential purchaser of the property that the land has been used for PCB remediation waste disposal, that the area will be restricted to "low occupancy" use and the requirement to maintain the cap.
- 17. Section 2.4 Offsite Disposal discusses characteristics of hazardous waste without additional discussion of "listed hazardous wastes" identified in OS2 sediment and management or disposal thereof.
- 18. Section 3.1 of the IRMWP has cited 40 CFR 761 and a self implementing onsite cleanup and disposal regarding the closure of OS2 however it appears that because OS2 is a treatment structure in a former combined industrial sewer, this site may not be applicable for a self implementing cleanup and disposal. If that is the case, prior written approval from the EPA would be required prior to implementation.
- 19. Section 4 Health & Safety: A site specific health and safety plan must be prepared for this remediation activity in accordance with DER-10 sec 1.9.
- 20. Section 5.3 Decontamination Procedures are anticipated to involve the use of heavy equipment potentially in contact with TSCA or hazardous waste. More detail will be required regarding the layout and management of a decontamination area and the containment and management of decontamination wastes. Under no circumstance shall decontamination fluids be discharged to the ground surface (as presented in the IRMWP) without appropriate chemical testing.

If Unisys chooses not to address the deficiencies and revise the IRM work plan, you are required to notify this office within 20 days after receipt of this letter. In this event I suggest a meeting be scheduled to discuss Unisys' concerns prior to the end of this 20 day period.

We look forward to working together to complete this remedial investigation. If you have questions or concerns on this matter, please contact me.

Sincerely

Timothy A. Schneider, P.E. Environmental Engineer 2

cc. P. Brookner A. Krasnopoler B. Putzig M. Cruden M. Doroski J. Deming B. Conlon M. Crance A. Meinstein



# ATTACHMENT B

**Oil Skimmer Photographs** 



Picture #1- Test Pit #2



Picture #2- Oil Skimmer manhole uncovered



Picture #3- Test Pit #3, next to Oil Skimmer manhole



Picture #4- Inside Oil Skimmer from manhole looking NW at pipe penetrations



Picture #5- Looking down inside Oil Skimmer at  $\sim$ 5' wide influent culvert from east



Picture #6- Looking down inside Oil Skimmer at internal baffles



Picture #7- Inside Oil Skimmer looking south at pipe opening to south



Picture #8- Inside Oil skimmer from Main Site Culvert looking east to ~5' wide culvert



Picture #9- Inside Oil Skimmer looking NW at pipe penetrations and internal baffles



Picture #10- Sediment sample material from Oil Skimmer directly below manhole



TP-14 – groundwater encountered in test pit



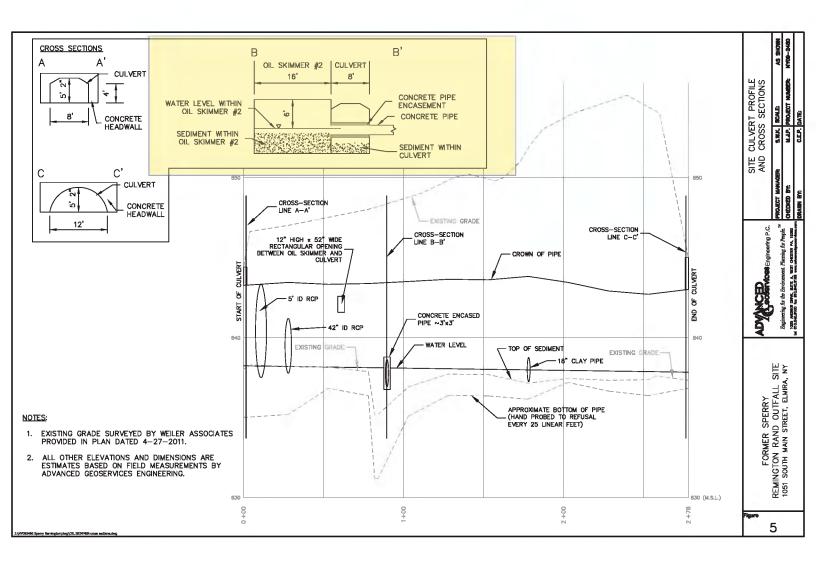
OS2 – Eastern end Access way

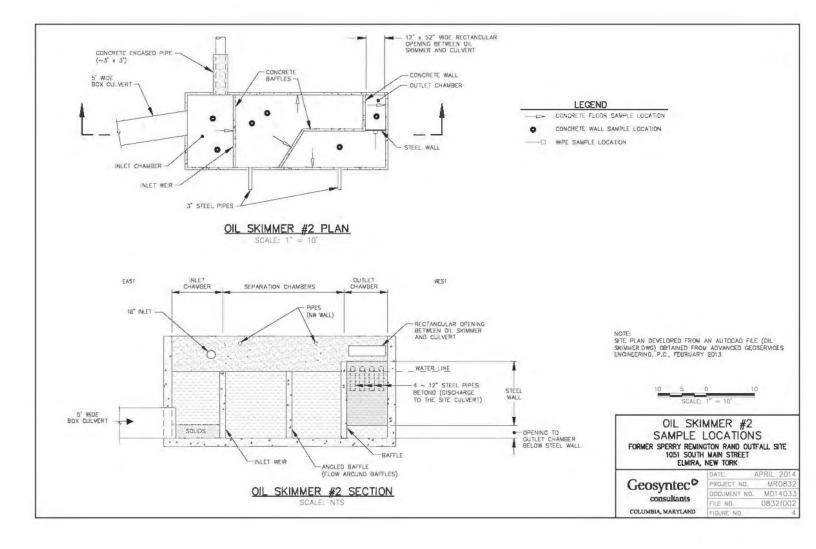


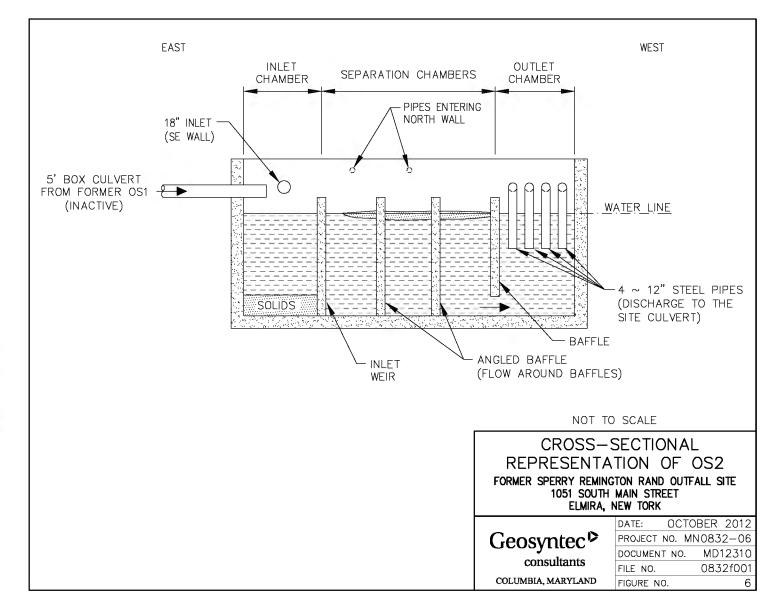
Inside OS2 view of 3x3 concrete encased pipe



OS2 – 5' RCP that enters structure at eastern end









14 July 2014

Mr. Timothy Schneider New York State Department of Environmental Conservation (NYSDEC) Division of Environmental Remediation, Region 8 6274 East Avon-Lima Road Avon, New York 14414-9519

VIA ELECTRONIC MAIL

#### Subject: Response to 23 June 2014 Agency Review Former Sperry Remington Site (#808043) (Site) Interim Remedial Measure Work Plan City of Elmira, Chemung County, NY

Dear Mr. Schneider:

On behalf of Unisys Corporation (Unisys), Geosyntec Consultants, Inc. (Geosyntec) is responding to your 23 June 2014 approval (with modifications) of the Interim Remedial Measure (IRM) Work Plan submitted by Unisys on 24 April 2014. The following presents the modifications requested by NYSDEC (shown in italics) and Unisys' response.

1. Please provide a response to the Department's specific comments / limitations / deficiencies of 5-20-13 (attached).

A response to specific Department comments received on 20 May 2013 on the IRM Pre-Design Investigation Report will be provided under separate cover.

2. The Department will not authorize the disconnection or closure of any drainage collection system (former combined industrial & storm sewer) connected to OS-2 or the Site Box Culvert until the full extent of each system is verified by physical or video inspection, the system function, condition and sediment arc characterized and an alternative plan to modify is accepted by the Department, property owners and any other agency with regulatory jurisdiction.

Unisys is prepared to eliminate disconnection/closure activities associated with OS2 under a revision to the existing IRM Work Plan.

Furthermore, Unisys has provided for investigation (geophysical and subsurface test pitting) of the two OS2 connections (5' box culvert [eastern end] and 18' pipe [southern side]) to determine the origination of these OS2 inlets under Section 2.1 of the IRM Work Plan. These investigation activities are scheduled to precede any closure activities, and will be subject to Department approval of any required work plan modification necessitated by the findings of that investigation, as described in Section 2.1.

Mr. Timothy Schneider 14 July 2014 Page 2

3. Summary statements in section 1.2 regarding pipe inlet connections to OS-2 being dry is not accurate and is inconsistent with Department field observations and Unisys report documentation/observation (attached). The Geosyntec depiction of these pipe connections in Figure 6 of the IRMPDI Report is inaccurate and inconsistent with field observations as well as previous submissions by Advanced Geoservices (attached).

The reference to the dry connection is referring to the 30" to 36" RCP pipe exiting catch basin CB-6, as observed during the IRM PDI (See attached photo). Clarification will be made as to the specific pipe.

Figure 6 of the IRM PDI Data Report was not part of the IRM Work Plan submittal package. Changes to the cross-section depiction of OS2 were incorporated in the IRM Work Plan. See Figure 4 and Appendix B, Construction Plans, Drawing 3 of 5 for the revised interpretations.

4. A summary statement in section 1.2 regarding "data" indicating that inlet connections to OS2 are inactive is inconsistent with reporting and should be removed. No video data was collected during the IRMPDI to confirm these connections and dye testing data also did not confirm connection. What "data" is this statement referring to?

Reference to "historical data" will be revised to state "Based on historical map depictions."

Reference to "Data and observations during this phase of work indicate that inlet connections to OS2 are inactive under normal conditions." will be removed.

5. A statement in section 1.3 regarding the "functionality of the site storm sewer system" should be removed and addressed in accordance with #2 above.

Current text stating "Data and observations made during the IRM PDI indicate OS2 can be taken out of service through closure while maintaining the functionality of the Site storm water sewer system." will be removed.

6. The IRM work plan provides insufficient scope of work for "additional storm sewer inspections" to address #2 above.

In addition to the current scope of work planned for the investigation of the unknown OS2 connections, Unisys is prepared to supplement the scope of work with physical inspection of accessible sewer connections via confined space entry certified personnel, equipment, and atmosphere monitoring meters.

7. Unisys will provide a scope of work that includes confined space entry and a plan to address debris I accessibility issues that limited sewer inspection during the IRMPDI.

See response to comment #5.

8. A statement in Section 2.1 regarding the "no other connections to the southern ..." is misleading and should be removed or modified and the statement of "no further investigation of connections

Mr. Timothy Schneider 14 July 2014 Page 3

between CB-10 and OS2" is not acceptable. The geometric configuration or alignment of piping assumed to connect OS2 to CB-10 would require a 90 degree change of direction. Because of this configuration, it is improbable that a direct piping connection exists without additional intermediary structures or pipes.

Reference to "no other connections to the southern..." will be revised to state "No other pipe connections were visually observed along the southern side of OS2 during the previous investigations."

The last two sentences of the third paragraph will be removed. Additionally, investigation activities planned for CB-6 and the 5' box culvert will also include CB-10 and the 18" pipe inlet to OS2

9. The Appendix B Construction Plans to "seal and grout" decommission the 18" pipe inlet on the south side of OS2 is unacceptable. All piping connections to OS2 are documented to have transported industrial waste. No pipe or structure will be decommissioned without appropriate characterization of it's contents, it's structural integrity and potential release of contaminants to the environment evaluated in accordance with DER-10. Cleaning of pipes and structures may also be required prior to decommissioning.

See response to comment #2.

10. The 18"pipe outfall from CB-10 identified as "steel" needs to be verified because CB-10 photos show bell end of pipe consistent with RCP or clay. Please provide video of this pipe section. Department observations of a curving alignment seen during the camera survey would be consistent with clay or concrete pipe and not steel.

See response to comment #8. Video from the camera survey was provided as Appendix D of the IRM Pre-Design Investigation (PDI) Data Report dated 19 February 2013.

11. The Appendix B Construction Plans to import backfill material must be consistent with DER-10 guidance.

Imported backfill material will meet the requirements specified in DER-10 under Section 5.4(e) and Table 5.4(e).

12. The Appendix B Construction Plan pg. 5 of 5 erosion and sediment notes # 11-14 regarding the handling of water and sediments (potentially contaminated) should be removed or appropriately modified.

Notes No. 11 through 14 will be modified appropriately with regard to handling of potentially impacted water and sediment.

13. The Appendix B Construction Plan depicts a permeable sediment stabilization area and does not address the-containment of potentially contaminated sediment leachate.

Appendix B – Construction Plans, Drawing 5 of 5, Plan View 1 from Sheet 2 and Section A of Plan View 1 of the Sediment Holding Area includes a scrim reinforced 6-mil poly sheeting above the gravel pad as well as a 6-mil poly sheeting to cover the sediment material.

14. All IRM work plans and drawings must be signed and sealed by a NYS Professional Engineer in accordance with the Consent Order.

The revised IRM Work Plan and drawing set will be signed and sealed by a Professional Engineer licensed in the State of New York.

15. The Department review of the IRMWP does not include the evaluation of the structural or hydraulic specifications presented in this plan. It will be the responsibility of the owner's or other regulatory jurisdictions to evaluate and accept these specifications.

See response to comment #2.

16. Section 2.3 of the IRMWP has cited 40 CFR 761, Section 61 regarding the closure of OS2 and specifically identified "capping" as a disposal option for leaving PCB remediation waste up to 100 ppm on site. To facilitate this option, Unisys must document the property owner's consent to filing a deed restriction that will in perpetuity notify any potential purchaser of the property that the land has been used for PCB remediation waste disposal, that the area will be restricted to "low occupancy" use and the requirement to maintain the cap.

See response to comment #2. In addition, any remaining PCB remediation waste associated with OS2 following the IRM will be further evaluated during the Remedial Investigation and Feasibility Study.

17. Section 2.4 Offsite Disposal discusses characteristics of hazardous waste without additional discussion of "listed hazardous wastes" identified in OS2 sediment and management or disposal thereof.

As stated in Section 2.4, waste profiles will be developed for all material generated during the IRM. These waste profiles will be evaluated by the off-site facility for proper disposal in accordance with regulatory criteria.

18. Section 3.1 of the IRMWP has cited 40 CFR 761 and a self-implementing onsite cleanup and disposal regarding the closure of OS2 however it appears that because OS2 is a treatment structure in a former combined industrial sewer, this site may not be applicable for a self-implementing cleanup and disposal. If that is the case, prior written approval from the EPA would be required prior to implementation.

Unisys will consult with EPA Region 2 personnel regarding the applicability of self-implementation of PCB remediation at OS2 and the subject site.

19. Section 4 Health & Safety: A site specific health and safety plan must be prepared for this remediation activity in accordance with DER-10 sec 1.9.

An addendum to the site-specific Health and Safety Plan prepared for the RI/FS will be included in the revised IRM Work Plan. In addition, the IRM contractor will be required to prepare a sitespecific Health and Safety Plan as noted on Appendix B – Construction Plans, Drawing 5 of 5, Health and Safety Note #3.

20. Section 5.3 Decontamination Procedures are anticipated to involve the use of heavy equipment potentially in contact with TSCA or hazardous waste. More detail will be required regarding the layout and management of a decontamination area and the containment and management of decontamination wastes. Under no circumstance shall decontamination fluids be discharged to the ground surface (as presented in the IRMWP) without appropriate chemical testing.

Additional detail will be provided in the revised work plan as to the means and methods to be employed during the decontamination processes associated with the IRM implementation under the revised IRM Work Plan.

#### CLOSING

Geosyntec looks forward to working with NYSDEC to complete this interim remedial measure. If you have any questions, please contact Mr. Kevin Krueger of Unisys at (651) 687-2210.

Sincerely,

Geosyntec Consultants, Inc.

arm Kampele

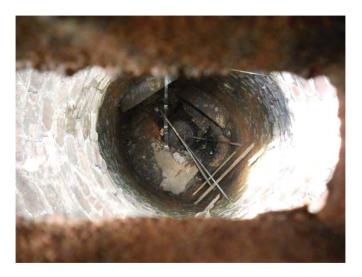
Aron Krasnopoler, Ph.D., P.E. Project Engineer

Pault, Barle

Paul Brookner, M.B.A., P.G. Project Director

Copies to: Bart Putzig, NYSDEC Ben Conlon. NYSDEC Mary Jo Crance, NYSDEC Melissa Doroski, NYSDOH Krista Anders, NYSDOH Kevin Krueger, Unisys David Noble, Unisys Adam Meinstein, STCC Kevin Murphy, Wladis Law Firm John H. Paul, Beveridge & Diamond Michael G. Murphy, Beveridge & Diamond

MN0832/MD14233.IRM\_WP\_RTC engineers | scientists | innovators Mr. Timothy Schneider 14 July 2014 Page 6



CB-6

New York State Department of Environmental Conservation Division of Environmental Remediation, Region 8 6274 East Avon-Lima Road, Avon, New York 14414-9519 Phone: (585) 226-5353 • Fax: (585) 226-8139 Website: www.dec.ny.gov



July 31, 2014

Mr. Kevin Krueger, PE Unisys Corporation Corporate Environmental Affairs 3199 Pilot Knob Road Eagan, NY 55121

Re: Former Sperry Remington Site (#808043) Interim Remedial Measure Work Plan – Response to Comments City of Elmira, Chemung County, NY

Dear Mr. Krueger:

The Department has completed its review of the document entitled "Interim Remedial Measure Work Plan" agency review draft dated April 2014 and has determined that the work plan does not substantially addresses the requirements of the Superfund Order. Please address the following comments in a revised submission:

- 1. Response #10: Attached please find a copy of Appendix D contents and corresponding figure. Unfortunately there are missing video files and / or incorrect file labels.
- 2. Response #13: The response and referenced construction details do not address the containment of potentially contaminated leachate associated with stabilizing saturated contaminated sediments. Any construction details will be referenced on the general drawings.
- 3. Response #18: The Department will be copied on USEPA correspondence.

With the above noted clarifications being addressed in the final revised work plan, a rapid approval response may be facilitated. Please provide a final revised work plan within 2 weeks for Department review and approval.

As a reminder, all final documents and reports are to be in electronic format on compact computer discs (CDs). The disk should contain an Adobe® Acrobat® Portable Document Format (PDF) file and must be searchable. In addition, all data submitted to the DER must be in the DEC-approved Electronic Data Deliverable (EDD). Moreover, new data must be submitted on a continuous basis immediately after data validation occurs but in no event more than 90 days after the data has been submitted to the remedial party or its consultant(s). In other words, data is not to be held and submitted with the related reports.

If Unisys chooses not to address the clarifications, you are required to notify this office within 20 days after receipt of this letter. In this event I suggest a meeting be scheduled to discuss Unisys' concerns prior to the end of this 20 day period.

We look forward to working together to complete this remedial investigation. If you have questions or concerns on this matter, please contact me.

Sincerely,

Timothy A. Schneider, P.E. Environmental Engineer 2

cc. P. Brookner A. Krasnopoler B. Putzig M. Cruden D. Hettrick J. Deming B. Conlon M. Crance A. Meinstein New York State Department of Environmental Conservation Division of Environmental Remediation, Region 8 6274 East Avon-Lima Road, Avon, New York 14414-9519 Phone: (585) 226-5353 • Fax: (585) 226-8139 Website: www.dec.ny.gov



Mr. Kevin Krueger, PE Unisys Corporation Corporate Environmental Affairs 3199 Pilot Knob Road Eagan, NY 55121 DRAFT

October 3, 2014

Re: Former Sperry Remington Site (#808043) Revised Interim Remedial Measures Work Plan Town of Southport, Chemung County, NY

Dear Mr. Krueger:

The Department has completed its review of the above referenced work plan submitted by Unisys in April 24, 2014, revised September 12, 2014 and has determined that the revised work plan does not substantially addresses the requirements of the Superfund Order. The work plan is rejected for the following reasons:

- 1. The revised work plan proposal to permanently close conveyance structures and OS2 is inconsistent with Unisys' 14 July 2014 response to comments and does not address the 23 June 2014 Department criteria for closure.
- 2. Pg 3 paragraph 1 last sentence "Data and observations…" was not removed in accordance with Unisys' 14 July 2014 response to comments. Please note that August 2014 observations documenting water with sheen in CB-6 are inconsistent with the 2012 IRMPDI observations.

A resubmitted IRM work plan must include:

- 1. Interim reporting for Department approval that documents and depicts the extent, function, structural integrity and chemical quality of sediments (if any) in the collection and conveyance systems connecting with OS2. Included in this interim report will be a justification for any closure and or redirection of surface collection and subsurface conveyance systems.
- 2. A conveyance system closure plan that also addresses potentially contaminated contents (if any). Written property owner approval will be required prior to Department notice to proceed with the permanent closure or modification of any privately owned structures.
- 3. Interim reporting for Department approval that documents the chemical results of OS2 cleaning. If PCB concentrations are greater than or equal to 1 ppm for porous materials (e.g., concrete) either further cleaning or replacement of the structure would be necessary.
- 4. Construction plans and details must eliminate the sediment holding area or provide a design that will contain potentially contaminated leachate for collection and appropriate offsite disposal.
- 5. Construction plans must appropriately address the closure of the 12" siphon outfall pipe(s) from OS2 to the box culvert and construction details should accurately depict the invert elevation of the 18" concrete encased pipe inlet.

The proposed IRM activities are not emergencies per DER-10, therefore if Unisys chooses not to fully address

the Department's concerns through an IRM, these concerns would become an immediate priority to be addressed through additional remedial investigation and remedy selection.

Please notify the Department of within 20 days after receipt of this letter of your intentions moving forward (revised IRMWP or RIWP Addendum).

If you have questions or concerns on this matter, please contact me.

Sincerely,

Timothy A. Schneider, P.E. Environmental Engineer 2

cc. P. Brookner A. Krasnopoler B. Putzig M. Cruden D. Hettrick J. Deming B. Conlon M. Crance A. Meinstein

## NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Division of Environmental Remediation, Region 8 6274 East Avon-Lima Road, Avon, NY 14414-9516 P: (585) 226-5353 I F: (585) 226-8139 www.dec.ny.gov

# <u>Via E-mail</u>

January 30, 2019

Mr. Kevin Krueger, PE Unisys Corporation Corporate Environmental Affairs 3199 Pilot Knob Road Eagan, MN 55121

Dear Mr. Krueger:

## Re: Revised Interim Remedial Measures Work Plan Former Sperry Remington Site #808043 Elmira, Chemung County

The New York State Department of Environmental Conservation (NYSDEC) and the New York State Department of Health (NYSDOH) have completed the review of "Revised Interim Remedial Measure Work Plan" for the Former Sperry Remington Site #808043, dated 24 April 2014, last revised 7 November 2018, and provide the following comments, modifications and additions for revision:

# General

- 1. Provide written approval of drainage modifications from both Southern Tier Commerce Center and the Elmira City School District.
- 2. Unisys is proposing cleanup criteria for concrete structures that **could** leave up to 100 mg/kg / 100 ug/cm2 PCBs. This would require institutional and engineering controls in accordance with 40 CFR 761. Please provide written approval from Southern Tier Commerce Center accepting institutional controls that would in part, identify to any purchaser that the land has been used for PCB remediation waste disposal, is restricted to low occupancy use and the presence and maintenance requirements of fences or caps, should this be the case.
- 3. Provide confirmation that all drainage modifications are consistent with industrial storm water regulations / permits.
- 4. Remediate all upgradient drainage infrastructure (STCC) prior to redirection from OS-2 and direct off-site discharge.
- 5. Appropriately dispose of Test Pit TP-2.2 spoils as TSCA waste.
- 6. Update depictions on Figure 4 to be consistent with descriptions and dimensions presented in Section 2.2.2 Test Pit and Trenching. Add typical section for backfill and demarcation in addition to chemical quality data for each pit or trench location and CB-15.



- 7. Complete the lateral and vertical delineation of all contaminants in soil above cleanup objectives and TSCA.
- 8. Add invert elevations/depth below ground surface of all infrastructure to contaminant figures.
- 9. Depict industrial sewers in plan and profile view including extent and estimated directions from camera survey (including ceramic lined 36" pipe with PVC break @ 395').
- 10. Please update all figures and construction drawings to show current, post IRM #2 conditions.
- 11. Confirmation sampling in accordance with DER-10 Section 5.4 (b) will be required for all excavations prior to backfill.
- 12. Section 2.4 Findings revise 4<sup>th</sup> bullet to clarify that direct connection along former industrial sewer alignments could not be confirmed during this phase of investigation. Observed obstructions have limited the extent of the camera survey and may restrict stormwater flow from upgradient reaches of the former industrial sewer. Additional work will be necessary to visually confirm the extent, condition and chemical quality of the sewer contents.
- 13. Section 2.4 Findings 6th Bullet Add piping from CB-6 contained standing water and accumulated sludges. Add - 75% blocked by heavy sludge. Correct - no evidence of collapse or structural compromise. Structurally sound pipe continues to the southeast beyond the sludge obstruction.



14. Section 2.4 Findings - 7th Bullet – add standing water and accumulated sludge 10-20% in pipe. Revise - structural compromise to edge of pipe @ 395 ft assumed to be piezometer (MW-8?) sand pack which obstructed further camera survey and flow. Correct - Structurally sound pipe continues to the north beyond obstruction.



15. Section 2.4 Findings – Add Bullet describing CB-15 as a multi chambered poured concrete structure having an open bottom and found to have standing water and debris. Identify the eastern chamber is bulk headed by concrete and the western chamber extends to the 5' box culvert connecting to OS-2. A 36" clay tile lined pipe empties into the main chamber and a 30" dia brick lined pipe empties into the west chamber.





- 16. Section 2.4 Findings 8th Bullet Modify last sentence to indicate that partial blockage in the 30" and 36" diameter pipes appears to restrict flow from CB-6 and other points north. Additional camera survey work is needed to confirm extent of 36" pipe system and connection of 30" system between CB-6 and west chamber of CB-15.
- 17. Section 2.4 Findings 8th Bullet Add excavation along the north side of OS-2 confirmed steel pipe connections have been removed.
- 18. Section 2.4 Findings 10th Bullet Add an 18" clay pipe is shown on historic drawings to connect directly from CB-15 to the site culvert....
- 19. Section 3.1 Storm Water Piping Modification Please see comment 4.
- 20. Section 3.1 Storm Water Piping Modification Please provide discussion and detailed decommissioning procedures for CB-10 and 18" pipe to OS-2.
- 21. Section 3.1.2 EHS Property Please modify camera inspections have shown a limited extent of storm water collection and obstructed flow to OS-2.
- 22. Section 3.2 Excavation of Shallow Subsurface Soils Please see comment 7.
- 23. Section 3.3 Removal of PCB-Impacted Material from OS-2 Jetting 18" pipe to OS-2 - Please verify the bottom of 18" pipe through site culvert does not directly discharge to the site culvert.



- 24. Section 3.3 Removal of PCB-Impacted Material from OS-2 Need for recleaning concrete left in place see comment 2.
- 25. Section 3.3 Removal of PCB-Impacted Material from OS-2 Closure of inlet and outlet connections please consider grouting 18" pipe only to the southern edge of the site culvert. Please provide design details of the cleaning and closure of the 5' box culvert. Former small diameter pipes along north wall do not exist.
- 26. Section 3.3 Removal of PCB-Impacted Material from OS-2 Please provide discussion and design details for the stabilization of saturated soils/waste.
- 27. Section 3.3 Removal of PCB-Impacted Material from OS-2 Please provide a stockpile management plan.
- 28. Section 3.3 Removal of PCB-Impacted Material from OS-2 Please provide tasks to characterize the 5' box culvert and contents prior to closure.
- 29. Section 3.4 Removal of OS-2 Eastern excavation side slopes shown in construction drawing do not extend to existing grade (NE) and must slope up from the removed portion of OS-2 along the eastern edge.
- 30. Section 3.4 Removal of OS-2 Please add confirmatory sampling for side and bottom wall sampling.
- 31. Section 5 Permits and Notifications Please see comment 3.
- 32. Figure 20 the proposed excavation 0-2 ft bgs should depict the extent of slope benching necessary to remove OS-2.
- 33. Figure 21 3" steel pipes on north edge of OS-2 do not exist.
- 34. Construction Drawings please remove "inactive" labels
- 35. Construction Drawings please show construction security fencing on STCC property
- 36. Construction Drawings please verify limits of safe excavation north and east of OS-2.
- 37.Construction Drawings Sheet 5 of 11 show TP2.2 spoils to be managed as TSCA.
- 38. Construction Drawings Please provide the limits of the site and show that decontamination and materials handling will be within the site boundaries.
- 39. Construction Drawings Sheet 7 of 11 Please note that all excavation slopes/benching will be determined by the "Competent Person" in accordance with OSHA Construction Safety.
- 40. Construction Drawings Sheet 7 of 11 The 18" pipe elevation is incorrectly depicted in B Section.
- 41. Construction Drawings Sheet 7 of 11 Slope / benching contours do not appear to be accurate or extend to existing grade north and east of OS-2.
- 42. Construction Drawings Sheet 8 of 11 Clean material will be imported and graded to drain via sheet flow to the east (no cut).
- 43. Construction Drawings Sheet 9 of 11 A Section Please demonstrate that leachate from the stabilization area will be contained and collected. In addition, please explain how the bottom liner be protected from the mechanical mixing of cement kiln dust.
- 44. Construction Drawings please provide construction details for leveling of stockpile, stabilization and loading areas.

If Unisys chooses not to address one or more of the comments, modifications and additions, you are required to notify this office within 20 days after receipt of this letter. In this event I suggest a meeting be scheduled to discuss your concerns prior to the end of this 20-day period.

If you have questions or concerns on this matter, please contact me.

Sincerely,

Timothy Schneider, P.E. Professional Engineer 1

- P. Brookner
- A. Krasnopoler
- B. Schilling
- M. Cruden
- H. Dudek
- D. Harrington
- B. Conlon
- D. Hettrick
- J. Deming



engineering p.c.

Geosyntec<sup>D</sup>

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100 Washington Avenue South Suite 1590 Minneapolis, Minnesota 55401 PH 612.253.8200 FAX 612.605.8261 www.geosyntec.com

28 June 2019

Mr. Timothy Schneider New York State Department of Environmental Conservation (NYSDEC) Division of Environmental Remediation, Region 8 6274 East Avon-Lima Road Avon, New York 14414-9519

VIA ELECTRONIC MAIL

#### Subject: Response to 30 January 2019 Review Revised Interim Remedial Measures Work Plan Former Sperry Remington Site – North Portion (#808043) City of Elmira, Chemung County, NY

Dear Mr. Schneider:

On behalf of Unisys Corporation (Unisys), Geosyntec Consultants, Inc. and its New York engineering affiliate, Beech and Bonaparte Engineering, P.C. (collectively, Geosyntec) are responding to the 30 January 2019 review by the New York State Department of Environmental Conservation (NYSDEC) of the Revised Interim Remedial Measure (IRM) Work Plan (OS2 IRM Work Plan) for the Former Sperry Remington Site (#808043) (Site) in Elmira, New York. The OS2 IRM Work Plan was initially submitted on 24 April 2014 and last revised 7 November 2018. Unisys notified NYSDEC of its intention to respond to NYSDEC's 15 October 2018 conditional approval letter within the allotted 20-days in an email communication on 14 February 2019.

To facilitate the discussion, the 30 January 2019 NYSDEC comments (shown in italics) are presented below, followed by Unisys' response.

1. Provide written approval of drainage modifications from both Southern Tier Commerce Center and the Elmira City School District.

Response: Written approval of drainage modifications from both Southern Tier Commerce Center (STCC) and Elmira City School District (ECSD) are provided in Appendix J.

2. Unisys is proposing cleanup criteria for concrete structures that could leave up to 100 mg/kg / 100 ug/cm2 PCBs. This would require institutional and engineering controls in accordance with 40 CFR 761. Please provide written approval from Southern Tier Commerce Center accepting institutional controls that would in part, identify to any purchaser that the land has been used for PCB remediation waste disposal, is restricted to low occupancy use and the presence and maintenance requirements of fences or caps, should this be the case

Response: Written approval from (STCC) accepting potential institutional controls is provided in Appendix J.

MN0832A/OS2 IRM Work Plan RTC engineers | scientists | innovators 3. Provide confirmation that all drainage modifications are consistent with industrial storm water regulations / permits.

Response: The proposed drainage modifications are consistent with State Pollution Discharge Elimination System (SPDES) permit held by ECSD (SPDES# NY0106216). A copy of the SPDES Permit is provided in Appendix K. The modifications are upstream of the ECSD discharge to the Site Culvert but the ECSD monitoring point is located in the EHS parking lot. A review of NYSDEC and USEPA records found no active SPDES permits for the STCC property.

4. Remediate all upgradient drainage infrastructure (STCC) prior to redirection from OS-2 and direct off-site discharge.

Response: Accepted. Fine-grained material will be flushed from upgradient drainage infrastructure, including CB-11, prior to the installation of new infrastructure for storm water flow redirection. Water and entrained solids will be collected at CB-11 and staged in a water management area for later off-Site disposal.

5. Appropriately dispose of Test Pit TP-2.2 spoils as TSCA waste.

Response: Accepted. Excavation for removal of OS2 will include Test Pit TP-2.2 spoils as shown on the Construction Drawings. Those spoils will be disposed of as TSCA waste.

6. Update depictions on Figure 4 to be consistent with descriptions and dimensions presented in Section 2.2.2 Test Pit and Trenching. Add typical section for backfill and demarcation in addition to chemical quality data for each pit or trench location and CB-15.

Response: Accepted. Figure 4 has been revised to be consistent with descriptions and dimensions presented in Section 2.2.2 Test Pit and Trenching. A typical section for backfill and demarcation has been added as well as chemical quality data for each pit or trench location and CB-15.

7. Complete the lateral and vertical delineation of all contaminants in soil above cleanup objectives and TSCA.

Response: The lateral and vertical extent of PCBs and metals has been completed within the IRM project area. The area is bounded by the STCC property line to the north and east, the Site Culvert to the south and the storm sewer to the west. Confirmation samples will be collected in accordance with DER-10 Section 5.4 (b) to document the removal of PCBs and metals above soil cleanup objectives and TSCA.

8. Add invert elevations/depth below ground surface of all infrastructure to contaminant figures.

Response: Accepted. Invert elevations and/or depth below ground surface have been added for all infrastructure shown on Figures 6 through 19.

9. Depict industrial sewers in plan and profile view including extent and estimated directions from camera survey (including ceramic lined 36" pipe with PVC break @ 395').

Response: Accepted: Profiles of industrial sewers investigated by inline camera survey have been added to Figure 5.

10. Please update all figures and construction drawings to show current, post IRM #2 conditions.

Response: Accepted. The extent of IRM #2 shown on figures and construction drawings has been updated to show the as-built conditions.

11. Confirmation sampling in accordance with DER-10 Section 5.4 (b) will be required for all excavations prior to backfill.

Response: Accepted. Proposed confirmation sample locations are presented on Figure 20 and Construction Drawings Sheets 5 and 7.

12. Section 2.4 Findings – revise 4<sup>th</sup> bullet to clarify that direct connection along former industrial sewer alignments could not be confirmed during this phase of investigation. Observed obstructions have limited the extent of the camera survey and may restrict stormwater flow from upgradient reaches of the former industrial sewer. Additional work will be necessary to visually confirm the extent, condition and chemical quality of the sewer contents.

Response: Accepted. The text has been revised as requested.

13. Section 2.4 Findings - 6th Bullet – Add - piping from CB-6 contained standing water and accumulated sludges. Add - 75% blocked by heavy sludge. Correct - no evidence of collapse or structural compromise. Structurally sound pipe continues to the southeast beyond the sludge obstruction.

Response: Accepted. The text has been revised as requested.

14. Section 2.4 Findings - 7th Bullet – add standing water and accumulated sludge 10-20% in pipe. Revise - structural compromise to edge of pipe @ 395 ft assumed to be piezometer (MW-8?) sand pack which obstructed further camera survey and flow. Correct - Structurally sound pipe continues to the north beyond obstruction.

Response: Accepted. The text has been revised as requested.

15. Section 2.4 Findings – Add Bullet describing CB-15 as a multi chambered poured concrete structure having an open bottom and found to have standing water and debris. Identify the eastern chamber is bulk headed by concrete and the western chamber extends to the 5' box culvert

connecting to OS-2. A 36" clay tile lined pipe empties into the main chamber and a 30" dia brick lined pipe empties into the west chamber.

Response: Accepted. The text has been revised as requested.

16. Section 2.4 Findings - 8th Bullet – Modify - last sentence to indicate that partial blockage in the 30" and 36" diameter pipes appears to restrict flow from CB-6 and other points north. Additional camera survey work is needed to confirm extent of 36" pipe system and connection of 30" system between CB-6 and west chamber of CB-15.

Response: Accepted. The text has been revised as requested.

17. Section 2.4 Findings - 8th Bullet – Add – excavation along the north side of OS-2 confirmed steel pipe connections have been removed.

Response: Accepted. The text has been revised as requested.

18. Section 2.4 Findings - 10th Bullet – Add – an 18" clay pipe is shown on historic drawings to connect directly from CB-15 to the site culvert....

Response: Accepted. The text has been revised as requested.

19. Section 3.1 Storm Water Piping Modification – Please see comment 4.

Response: See response to Comment 4.

20. Section 3.1 Storm Water Piping Modification – Please provide discussion and detailed decommissioning procedures for CB-10 and 18" pipe to OS-2.

Response: The 18-in clay pipe connecting CB-10 to OS2 will be inspected to verify that the pipe does not discharge to the Site Culvert (Comment 23). If the connection to OS2 is confirmed by visual inspection, the CB-10 will be isolated and the pipe will be flushed with water in the direction of OS2 to remove fine-grained material from the line. A grout slurry will then be injected into the pipe in order to plug the line up to the southern edge of the Site Culvert (Comment 25). The surface ring at CB-10 will be removed. CB-10 will be grouted up to one (1) ft bgs and then backfilled with imported fill.

21. Section 3.1.2 EHS Property – Please modify - camera inspections have shown a limited extent of storm water collection and obstructed flow to OS-2.

Response: Accepted. The text has been revised as requested.

22. Section 3.2 Excavation of Shallow Subsurface Soils – Please see comment 7.

Response: See response to Comment 7.

MN0832A/OS2 IRM Work Plan RTC engineers | scientists | innovators 23. Section 3.3 Removal of PCB-Impacted Material from OS-2 – Jetting 18" pipe to OS-2 - Please verify the bottom of 18" pipe through site culvert does not directly discharge to the site culvert.

Response: See response to Comment 20.

24. Section 3.3 Removal of PCB-Impacted Material from OS-2 – Need for recleaning concrete left in place – see comment 2.

Response: Section 3.3 has been revised to clarify the need for recleaning and resampling nonporous and porous materials. Non-porous materials will be recleaned and resampled if total PCB concentrations in wipe samples are greater than 100 micrograms per square centimeter. Porous material to be transported off-Site for disposal will be recleaned and resampled if total PCB concentrations in concrete cores are greater than or equal to 50 milligrams per kilogram (mg/kg). Porous material to be remain in place beneath a soil cap will be recleaned and resampled if total PCB concentrations in concrete cores are greater than or equal to 100 milligrams per kilogram (mg/kg).

25. Section 3.3 Removal of PCB-Impacted Material from OS-2 – Closure of inlet and outlet connections – please consider grouting 18" pipe only to the southern edge of the site culvert. Please provide design details of the cleaning and closure of the 5' box culvert. Former small diameter pipes along north wall do not exist.

Response: The 18-in inlet pipe will be grouted to the southern edge of the Site Culvert as requested. The eastern wall of OS2 including the 5-ft box culvert inlet will remain in place. The 5-ft box culvert will be cleaned at the inlet then closed using concrete blocks and grout. Former small diameter pipes along the north wall have been removed from the figures and drawings.

26. Section 3.3 Removal of PCB-Impacted Material from OS-2 – Please provide discussion and design details for the stabilization of saturated soils/waste.

Response: Discussion of details for stabilization of saturated solids prior to disposal is included in Section 3.3. Cement kiln dust will be mixed into the saturated fine-grained material (43 - 65% moisture based on analytical results) in order to reduce the moisture content to levels that will be acceptable to the receiving facility. Mixing will be performed in batches using the excavator bucket.

27. Section 3.3 Removal of PCB-Impacted Material from OS-2 – Please provide a stockpile management plan.

Response: A stockpile management plan is presented in Section 5.2 – Temporary Facilities.

28. Section 3.3 Removal of PCB-Impacted Material from OS-2 – Please provide tasks to characterize the 5' box culvert and contents prior to closure.

Response: The interior of the 5-ft box culvert will be inspected for integrity and the thickness of fine-grained material. Samples of fine-grained material, if present, will be collected for characterization prior to closure.

29. Section 3.4 Removal of OS-2 – Eastern excavation side slopes shown in construction drawing do not extend to existing grade (NE) and must slope up from the removed portion of OS-2 along the eastern edge.

Response: Excavation grading for OS2 removal shown on Sheet 7 of the Construction Drawing has been revised to match existing grades on the EHS property and final subgrade following shallow soil removal on the STCC property (Sheet 5).

30. Section 3.4 Removal of OS-2 – Please add confirmatory sampling for side and bottom wall sampling.

Response: Confirmation samples will be collected from the sidewalls and bottom of the excavation to remove OS2 as shown on the Construction Drawings in accordance with Section 5.4 (b) of DER-10. Confirmation samples will be submitted to the fixed laboratory for analyses for PCBs and metals in accordance with QAPP.

31. Section 5 Permits and Notifications – Please see comment 3.

Response: See response to Comment 3.

32. Figure 20 – the proposed excavation 0-2 ft bgs should depict the extent of slope benching necessary to remove OS-2.

Response: Figure 20 presents the proposed shallow soil excavation to achieve the IRM objectives for soil cleanup at the Site. Sloping of the excavation to remove OS2 will extend onto the EHS property. Soils on the 0-2 ft interval have been previously remediated on that property as part of IRM #2 for the Former Sperry Remington Site – North Portion (#c808022).

33. Figure 21 - 3" steel pipes on north edge of OS-2 do not exist.

Response: The steel pipes have been removed from Figure 21.

34. Construction Drawings – please remove "inactive" labels

Response: "Inactive" labels have been removed.

35. Construction Drawings – please show construction security fencing on STCC property

Response: Construction security fencing on STCC property is shown on Sheet 3.

*36. Construction Drawings – please verify limits of safe excavation north and east of OS-2.* 

Response: Excavations will be sloped 1H:1V north and east of OS2. Limits of safe excavation will be confirmed by the "Competent Person" in accordance with OSHA Construction Safety.

*37. Construction Drawings – Sheet 5 of 11 – show TP2.2 spoils to be managed as TSCA.* 

Response: See response to Comment 5.

38. Construction Drawings – Please provide the limits of the site and show that decontamination and materials handling will be within the site boundaries.

Response: The Site boundary will be added to the Construction Drawings. The Site is a 185' x 65' rectangular area (0.28 acres) as shown on Figure 2. Material handling and decontamination will be within the limit of disturbance (LOD) shown on the Construction Drawings. The LOD extends beyond the Site boundary to the extent necessary to complete the IRM objectives. Unisys will acquire access for IRM activities beyond the Site boundary from STCC and ECSD as necessary.

39. Construction Drawings – Sheet 7 of 11 – Please note that all excavation slopes/benching will be determined by the "Competent Person" in accordance with OSHA Construction Safety.

Response: Accepted. Notes on Sheet 7 will require that all excavation slopes/benching be confirmed by the "Competent Person" in accordance with OSHA Construction Safety.

40. Construction Drawings – Sheet 7 of 11 – The 18" pipe elevation is incorrectly depicted in B Section.

Response: The elevation of the pipe 18-in pipe has been corrected.

41. Construction Drawings – Sheet 7 of 11 – Slope / benching contours do not appear to be accurate or extend to existing grade north and east of OS-2.

Response: See response to Comment 29.

42. Construction Drawings – Sheet 8 of 11 – Clean material will be imported and graded to drain via sheet flow to the east (no cut).

Response: Accepted. Existing soils will not be removed to grade the area for drainage to the northeast (no cut). Material approved for import by NYSDEC will be used for fill to required grades.

Mr. Timothy Schneider 28 June 2019 Page 8

43. Construction Drawings – Sheet 9 of 11 – A Section – Please demonstrate that leachate from the stabilization area will be contained and collected. In addition, please explain how the bottom liner be protected from the mechanical mixing of cement kiln dust.

Response: Leachate will be contained within the bermed and lined portion of the stabilization area until cement kiln dust is applied for stabilization. A sump will be place at the lowest point within the bermed area for leachate collection if necessary. Mechanical mixing of cement kiln dust will be performed using an excavator bucket outfitted with a guard to prevent damage to the bottom liner. A layer of geotextile fabric will be place on top of the bottom liner as an indicator to the operator.

44. Construction Drawings – please provide construction details for leveling of stockpile, stabilization and loading areas.

Response: The stockpile and stabilization areas will be constructed on top of the loading area. The loading area will be leveled using imported fill following placement of the geotextile base layer.

#### CLOSING

Unisys looks forward to working with NYSDEC and NYSDOH to complete this Remedial Investigation. If you have any questions, please contact Mr. Kevin Krueger of Unisys at (651) 212-7273.

Sincerely,

Geosyntec Consultants, Inc.

Paul A. Barden

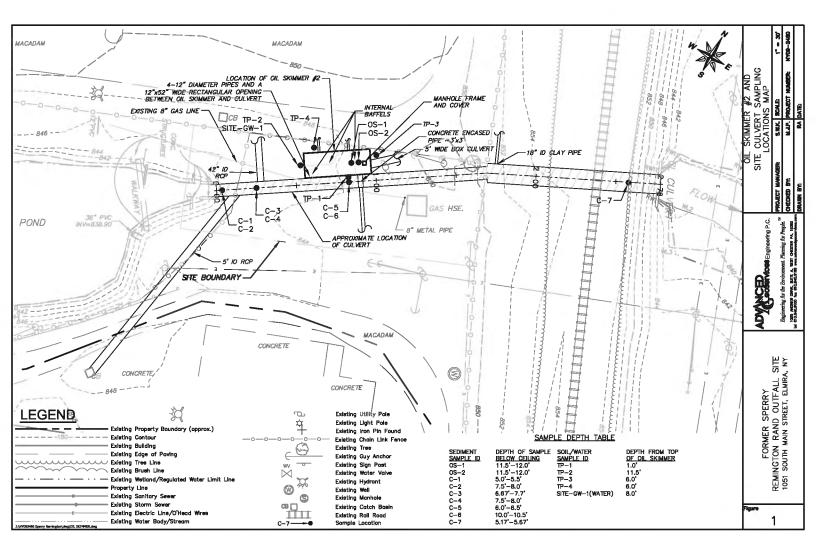
Paul Brookner Project Director Geosyntec Consultants, Inc.

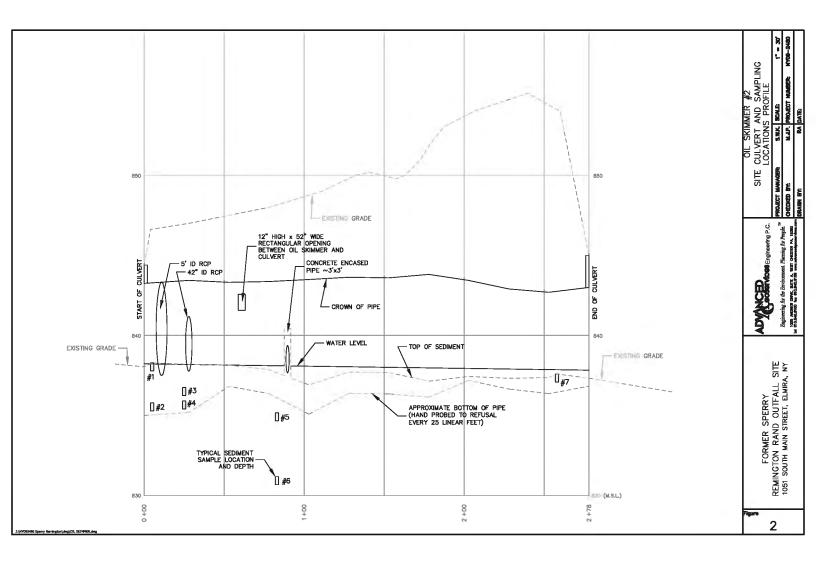
Copies to: Bernette Schilling, NYSDEC Michael Cruden, NYSDEC Heidi Dudek, NYSDEC Ben Conlon. NYSDEC Dawn Hettrick, NYSDOH Justin Deming, NYSDOH

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Aron Krasnopoler, Ph.D., P.E. Project Engineer/Project Manager Beech and Bonaparte Engineering P.C.

Kevin Krueger, Unisys Beth Parker, Unisys Michael G. Murphy, Beveridge & Diamond Adam Meinstein, STCC Kevin Murphy, Wladis Law Firm Mike Dunn, ECSD Appendix B Site Culvert Plan View and Profile





Appendix C Geophysical Survey Reports

NEW Y	ORK L	EAK	DET	ECT	ION,	INC.
					ION,	INC.

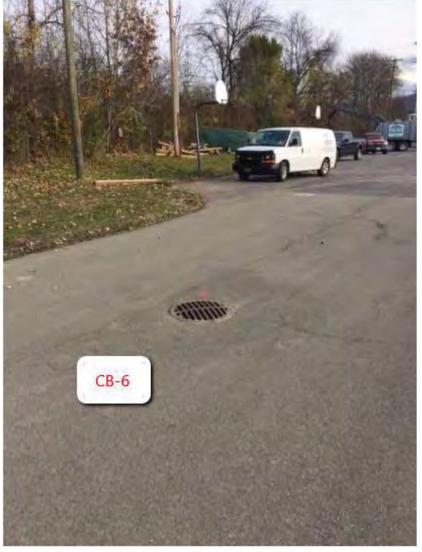
Date: <u>11/9/17</u>	Technicia	n: <u>Joe Goodfellow</u>
Customer: Geosyntec Consultan	ts	
Site Address: 777 So. Main St. E	Imira, NY	
Contact Person: Ellen Buelow	Phone: <u>612-295-3715</u>	Phone:
Scope of Work: Locate the direct	ction of the pipe coming out of catch	basin CB-6
Type of Service:		
Leak Detection	Utility Location/GPR	Video Inspection
Infrastructure Assessment	Utility Mapping/AutoCAD	
Type of Equipment Used		
Profiler EMP 400	□ RD4000	MetroTech Vivax vLocPro2
LC2500 Leak Correlator	🛛 Noggin 250 mHz	PosiTector UTG G3
S-30 Surveyor	□ Noggin 500 mHz	Video Inspection Camera
🛛 Sonde	Conquest 1000 mHz	Helium # Bottles
Leica Robotic Total Station	🗌 Leica GPS	
Marking Used		
🛛 Paint	🗌 Flags	Chalk
Updated existing maps onsite	Other:	
Instructions from Onsite Conta designated areas	<b>act:</b> Video manholes/catch basins an	nd find direction of pipework, GPR
Size of Pipe:		
Ground Cover/Weather Condit	ions: Pavement, grass, dirt. Clouds,	cold
	at CB-6, scanned area of test pit 4 ar basin open on CB-10. See attached	nd 2. Scanned grassy area near CB-10
Site Access/Safety Training:	Expiration Date:	_
Information Transfer		
Information relayed on site to	b: <u>Ellen</u> Hand drawn map (fo to office for digital rema	

NEW YORK LEAK DETECTION, INC.

Kev	
Blue	Water
Red	Power
Orange	Communications
Yellow	Gas/Flammable Fuel
White	Unknown
Green	Storm/Sanitary



NEW YORK LEAK DETECTION, INC.



### NYLD Infrastructure NEW YORK LEAK DETECTION, INC.



NEW YORK LEAK DETECTION, INC.



### NEW YORK LEAK DETECTION, INC.



### NYLD Infrastructure NEW YORK LEAK DETECTION, INC.



Appendix D Test Pit Logs and Photographs

Geo	svnt	tec					Job. No.Client:UnisyMN0832A.9Project:Elm		Loca Elmira, N	
	consult	ants					Sampling Location Descriptio	on: soil spoils	Locatio TP-	
	cientists   im	novators	LO	G OF TES	T PIT		FORMER OS2 CONNECTION INVEST		Sheet 1	
Coordinates:					-		Sample Method: Composite sa	ample		
Surface Eleva				Approxim	ately 858.3 ft.		Depth of Test Pit: 8 ft. bgs		Sampling l	Date/Time
Reference El					-		<b>Depth to Bedrock (ft. bgs):</b> N/		Start	Finish
Reference De	escription:			Test Pit TP	-1.1 SE of OS-2		Groundwater Encountered (ft	<u> </u>	1130	1500
								NE-SW, SE of OS-2		
Depth	PID			TAL	PCBs/		Surface Conditions: Grass			
Interval	(ppm)	VOCs	SVOCs	Metals	Pesticides		Weather: 25-35°F, partly cloudy i	in the morning and sunny in the		
(ft. bgs)	(rr)							Description of Materia	al	
0-0.67'	0.0						TOPSOIL, ML, light brown, non plastic	c, medium dense, dry silt.		
0.67-1"	0.0						ML, dark gray, loose, dry, silt with grav	vel, gravel consists of coal and sl	ag fragments.	
1-2'	0.0						ML, orange with dark brown mottled t	exture, loose, dry, silty sand with	h gravel and brick.	
2-8'	0.0						FILL, yellow-brown, medium loose, dr	y, silty sand with abundant yellc	ow brick.	
						NO	TES: Surface dimension: 2.5' x 10' (approxim was collected from TP-1.1 soil spoils.	nately). No structure was encoun	tered in TP- 1.1. Samp	ble TP1_01_110917
Logged by:		E. Buelow					Date:	9-Nov-17		
Sample Interv	val:	0-8 ft. bgs	, excavatior	n soil spoils	3		Time:	-		

Ceo	synt	POOD							lient: Project:	Unisys Elmira			<b>ation</b> New York
UCU	consult	ants						Sampling Loc	,	cription:	soil spoils		<b>ion ID:</b> P-2.1
engineers 1 s	cientists   inr	novators	LO	G OF TES	T PIT			FORMER OS2 AR	REA CONNE	CTION INVESTI	IGATION		1 of 1
Coordinates:					-			Sample Meth	od: Compo	osite sample			
Surface Eleva	ation:				-			Depth of Test	<b>t Pit:</b> 8 ft. ł	bgs		Sampling	Date/Time
Reference El	evation:			850-8	51 ft. bgs			Depth to Bed	rock (ft. bg	gs): N/A		Start	Finish
Reference De	escription:			Test Pit 2 Ar	ea, SW of CB-15			Groundwater	Encounte	red (ft. bgs):	N/A		
	-		-				2	Disposition o	of Test Pit:	NW-SE	E, SW of CB-15	1000	1215
Depth								Surface Cond	itions:	Soil (exposed	during clearing of	f trees and debris)	
Interval	PID	VOCs	SVOCs	TAL	PCBs/	TCLP		Weather: <sup>25</sup>	5-35°, Partly S	Gunny			
(ft. bgs)	(ppm)			Metals	Pesticides					Des	cription of Ma	aterial	
0-3' 3-8'	0.0							with gravel. Grav	rel consists of	well rounded cla	asts, and angular f	medium dense, dry, mass oreign material (slag and c	coal).
												with sand, gravel is fine to ag, brick and 1 ft. long piec	
							NOTES:					was exposed during excaved from TP-2.1 soil spoils.	vation and trends NE-
Logged by:		E. Buelow	7					E	Date:	8	-Nov-17		
Sample Interv	val:	8 ft. bgs, e	excavation s	oil spoils				Т	ime:		-		

Geo	osynt	ecD						MN0832A.9 Project: Elmira	Loca Elmira, N	a <b>tion</b> New York
Gee	consult	ants						Sampling Location Description: soil spoils	<b>Locati</b> TP-	
engineers   : Coordinates:	scientists   ini	novators	LO	G OF TES	T PIT			FORMER OS2 CONNECTION INVESTIGATION Sample Method: Composite sample	Sheet	
Surface Eleva					-		-	Depth of Test Pit: 2-8.5 ft. bgs	C	D. (. /T'
Reference Eleva			0	40.06 ft bas (	surface elevation	2)	-	Depth to Bedrock (ft. bgs): N/A	Start	Date/Time Finish
Reference De				0	-2 and slightly		- II.	Groundwater Encountered (ft. bgs): N/A	Start	Filish
Reference De	escription.		NE of OS-2	ea, above OS	-2 and slightly	_		<b>Disposition of Test Pit:</b> NW-SE, above and NE OS-2	1415	1600
Depth			112 01 00-2					Surface Conditions: Grass		
Interval	PID	VOCs	SVOCs	TAL	PCBs/	TCLP		Weather: 25-35°, Partly Sunny		
(ft. bgs)	(ppm)	1005	01000	Metals	Pesticides	ichi		Description of Materia	al	
0-2'	0.0							SM, dark brown, moist, medium dense, noncohesive, non-plastic, silty coarse, sand is coarse, some grass roots present	sand with gravel, grav	vel is medium to
2-6'	0.0							GM, dark brown, dry-moist, medium dense, noncohesive, non plastic, : sand is coarse.	silty gravel with sand,	cobbles fine to coarse,
6-8.5'	0.0							GM, dark green-gray, appears to be dry-moist, medium-loose, noncohe cobbles coarse, sand is coarse.	sive, non plastic, silty	gravel with sand,
	• 		•				NOTES:	Sample TP2_02_110817 was collected to characterizes the soil spoils fro was excavated, the OS-2 manhole was unearthed, the five foot culvert e of the active site culvert to the SE was exposed.		
Logged by:		E. Buelow	7			0		Date: 8-Nov-17		
Sample Interv	val:	8.5 ft. bgs	, excavation	n soil spoils	3	-		Time:		

Geo	symt	POD						Job. No. Client: MN0832A.9 Project:	Unisys Elmira	Loca Elmira, N					
GCU	consult	ants						Sampling Location Des	scription: soil spoils	Location ID: TP-3.1					
engineers   s	cientists   ini	novators	LO	G OF TES	T PIT			FORMER OS2 CONNECTION	N INVESTIGATION	Sheet					
Coordinates:					-			Sample Method: Composite sample							
Surface Eleva	ation:				-			Depth of Test Pit: 11 ft	. bgs	Sampling	Date/Time				
Reference El	evation:			852.1 ft. (sur	face elevation)			Depth to Bedrock (ft. b	gs): N/A	Start	Finish				
Reference De	escription:		Located on t	he N. edge of	the EHS parkin	g lot, SE of		Groundwater Encounte	ered (ft. bgs): N/A	1020	1500				
			the gas line c	utting throug	h the parking lo	ot (NE-SW).	7 s	Disposition of Test Pit:	NW-SE. NE of CB-6	1030	1500				
Depth	PID			TAL	PCBs/			Surface Conditions:	Grass						
Interval	(ppm)	VOCs	SVOCs	Metals	Pesticides	TCLP		Weather: 14°F, Partly clo	oudy in the morning and sunny in the a						
(ft. bgs)	(ppm)			Wietais	1 conclues				Description of Mater	ial					
0-0.83'	0.0							TOPSOIL, ML, light brown, no	on plastic, dry, silt with roots.						
0.83'-6'	0.1								k brown, medium dense, low plastic, silt te size of 4-5 cm), yellow brick makeup •		and, localized clay,				
6-11'	0.0							GM, dark brown, dry to moist afar and soil spoils).	, medium dense, low plastic, silty grave	l with coarse sand. (de	scriptions made from				
							NOTES:	Sample TP3_01_111017 charac excavation.	terized the soil spoils of TP-3.1. No stru	uctures were observed	during TP-3				
Logged by:		E. Buelow	-					Date:	10-Nov-17						
Sample Interv	val:	0-11' ft bg	s, excavatic	on soil spoi	ls			Time:							

and the second sec	scientists   in	tec Cants		G OF TES	T PIT - -		1	Job. No. Client: MN0832A.9 Project: Sampling Location Des FORMER 052 CONNECTION Sample Method: Comp Depth of Test Pit: Appr Depth to Bedrock (ft. bg	INVESTIGATION posite sample oximately 11 ft. bgs	Elmira, N Locati TP Sheet	Ation New York on ID: -3.2 1 of 1 Date/Time Finish
Reference De	escription:		South	neast of CB-6	(approximately	26 ft.)	2	Groundwater Encounte Disposition of Test Pit:	N-S, NE of CB-6	0945	1115
Depth Interval (ft. bgs)	PID (ppm)	VOCs	SVOCs	TAL Metals	PCBs/ Pesticides	TCLP		Surface Conditions: Weather: 25° F, Sunny	Grass Description of Mat	erial	
0-0.8'	0.0							TOPSOIL, ML, light brown, no	n plastic, dry, silt with roots		
0.8'-6'	0.0								brown, medium dense, low plastic, e size of 4-5 cm), yellow brick make		and, localized clay,
6-11'	0.0							GM, dark brown, dry to moist, fragments.	medium dense, low plastic, silty gr	avel with coarse sand with	h brick and clay pipe
							NOTES:	No structures were observed d	uring TP-3 excavation.		
Logged by:		E. Buelow	τ			,		Date:	11-Nov-17		
Sample Inter	val:	no sample	e collected					Time:		_	

Geo	synt consult	ants						Job. No. Client: MN0832A.9 Project: Sampling Location	t:	Unisys Elmira iption: soil spoils	Elmira, N	ation New York .on ID: -4.1
engineers   s	scientists   inr	novators	LO	G OF TES	T PIT	_	-	FORMER OS2 CONNECT Sample Method: Co			Sheet	1 of 1
Surface Elev			-		-		·	Depth of Test Pit:	1	approximately 11.5 ft. bgs	S Sampling	Date/Time
Reference El					_		-	Depth to Bedrock (f	ft bos		Start	Finish
Reference D			Test Pit locat	ed perpendic	ular to the EHS-	Norfolk	-	Groundwater Encou			Sturt	Thisi
	1				ne, NW of CB-1		-	Disposition of Test		NE-SW	0800	1400
Depth								Surface Conditions	s:	top soil was removed during tre	e removal, dry exposed so	il surface
Interval	PID	VOCs	SVOCs	TAL	PCBs/	TCLP		Weather:				
(ft. bgs)	(ppm)			Metals	Pesticides					Description of Ma	terial	
0-6'	0.0							SM, dark gray-brown, dry	ry, loose,	silty sand with gravel, gravel is a	fine to coarse with coal an	slag debris
6-8'	0.0							SM, light yellow-brown, s	silty san	d with coarse gravel, less fill mat	terial.	
8-11.5'	0.0							SM, light yellow to dark b	brown, s	silty sand with gravel and debris	(gravel and brick)	
							NOTES	extends northeast from C		d structure was encountered. Thi mple TP04_01_111317 characteri		
Logged by:		E. Buelow	7			56		Date:	5	11/13/2017 - 11/14/201	7	
Sample Inter	val:	0-11.5' ft.	bgs, excava	tion soil sp	ooils			Time:	3			

engineers 1 s Coordinates: Surface Elev. Reference El	consult scientists   in ation:	ants	LO	G OF TES	T PIT - -			Job. No.       Client:       Unisys         MN0832A.9       Project:       Elmira         Sampling Location Description:       soil spoils         FORMER 052 CONNECTION INVESTIGATION         Sample Method:       Composite sample         Depth of Test Pit:       approximately 11 ft. bgs         Depth to Bedrock (ft. bgs)       N/A	Loca Elmira, N Locati TP- Sheet 1 Sampling Start	Jew York on ID: -4.2 1 of 1
Reference D	escription:		TP-4.2, 3	37 ft. NW of b	rick connection	to CB-15	2	Groundwater Encountered (ft. bgs): N/A Disposition of Test Pit: NE to SW	1245	1530
Depth Interval (ft. bgs)	PID (ppm)	VOCs	SVOCs	TAL Metals	PCBs/ Pesticides	TCLP		Surface Conditions: Weather: Description of Ma	iterial	_
0-1.2'	0.1							TOPSOIL, ML, light brown, non plastic, medium dense, dry silt.		
1.2-6'	0.1							FILL, GM, dark gray to black, medium dense, dry, silty gravel wi material (coal, slag, and yellow or red brick).	th sand, grains and clast are	e dominated by fill
6-10'	0.0							Light yellow-brown coarse-silty sand with gravel (abundant bric	k) with lenses of grey-brow	n plastic clay.
10-11.5'	0.3							SAME AS ABOVE, with staining and strong hydrocarbon odor.		
							NOTES	Sample TP4_02_111717 was collected from soil spoils characteriz staining were observed at an approximate depth of eleven (11) ft. characterize this area of TP-4.2. No structure was observed.		
Logged by:		E. Buelow	7					Date: 17-Nov-17		
Sample Inter	val:	0-6' ft. bgs	s, excavatio	n soil spoil	s			Time:	_	

### GEOSYNTEC CONSULTANTS Photographic Record

Geosyntec<sup>D</sup>

#### **Client: Unisys**

Project Number: MN0832A

Site Name: Former Sperry Remington Site

#### Photograph ID: 1

Date: 11/8/2017

**Direction:** E

**Comments:** Test Pit-2.1 south of CB-15, orange paint marks indicate the edge of the 5 ft culvert.



Site Location: City of Elmira, Chemung Country, NY

#### Photograph ID: 2

Date: 11/8/2017

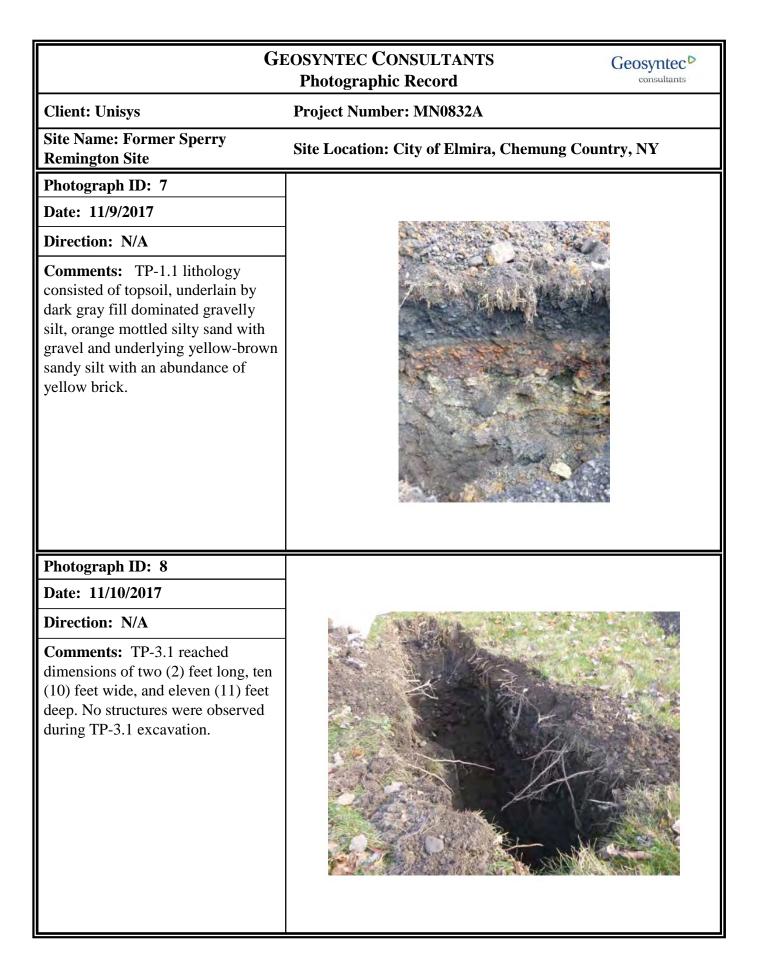
Direction: N/A

**Comments:** Slag material found in TP-2.1 and in other test pits on site.



Gi	EOSYNTEC CONSULTANTS     Geosyntec       Photographic Record     consultants
Client: Unisys	Project Number: MN0832A
Site Name: Former Sperry Remington Site	Site Location: City of Elmira, Chemung Country, NY
Photograph ID: 3	
Date: 11/8/2017	
Direction: N/A	
<b>Comments:</b> Sample fill fragments found in TP-2.1 and other soil spoils on site. On the right side is a yellow fragment of brick common in soils found in the Test pit areas 2, 3, and 4.	
Photograph ID: 4	
Date: 11/8/2017	
Direction: N/A	
<b>Comments:</b> A fragment of coal collected from TP-2.1 soil spoils.	

G	EOSYNTEC CONSULTANTS Photographic RecordGeosyntec consultants
Client: Unisys	Project Number: MN0832A
Site Name: Former Sperry Remington Site	Site Location: City of Elmira, Chemung Country, NY
Photograph ID: 5	
Date: 11/9/2017	
Direction: NE	
<b>Comments:</b> TP-2.2 investigated the northern and southern edges of OS2, the OS2 manhole, and the 5-ft box culvert headed northeast. Orange paint marks identify the edges of the 5-ft box culvert.	
Photograph ID: 6	
Date: 11/8/2017	
Direction: N/A Comments: The OS-2-man hole was uncovered in TP-2.2 approximately 2 ft bgs.	



GEOSYNTEC CONSULTANTS Photographic Record Geosyntec Consultants		
Client: Unisys	Project Number: MN0832A	
Site Name: Former Sperry Remington Site	Site Location: City of Elmira, Chemung Country, NY	
Photograph ID: 9		
Date: 11/10/2017	Navi State	
Direction: N/A		
<b>Comments:</b> TP-3.1 and TP-3.2 contained soil of similar color and composition, the soil color alternated between yellow-brown to dark brown and ranged in composition from silty sand with gravel to silty gravel with coarse sand.		
Photograph ID: 10		
Date: 11/11/2017		
Direction: SE	A A A	
<b>Comments:</b> TP-3.2 was located closer to CB-6 (bottom left), at the location where the previous camera survey showed a sewer line take a sharp right turn. No structures were encountered.		

GEOSYNTEC CONSULTANTSGeosyntecPhotographic Recordconsultants		
Client: Unisys	Project Number: MN0832A	
Site Name: Former Sperry Remington Site	Site Location: City of Elmira, Chemung Country, NY	
Photograph ID: 11		
Date: 11/11/2017		
Direction: N/A	A CONTRACT OF THE OWNER	
<b>Comments:</b> Clay pipe fragments discovered in TP-3.2.		
Photograph ID: 12		
Date: 11/13/2017		
Direction: SE Comments: TP 4.1 was excavated north-west of CB-15, perpendicular to the EHS fence line.		

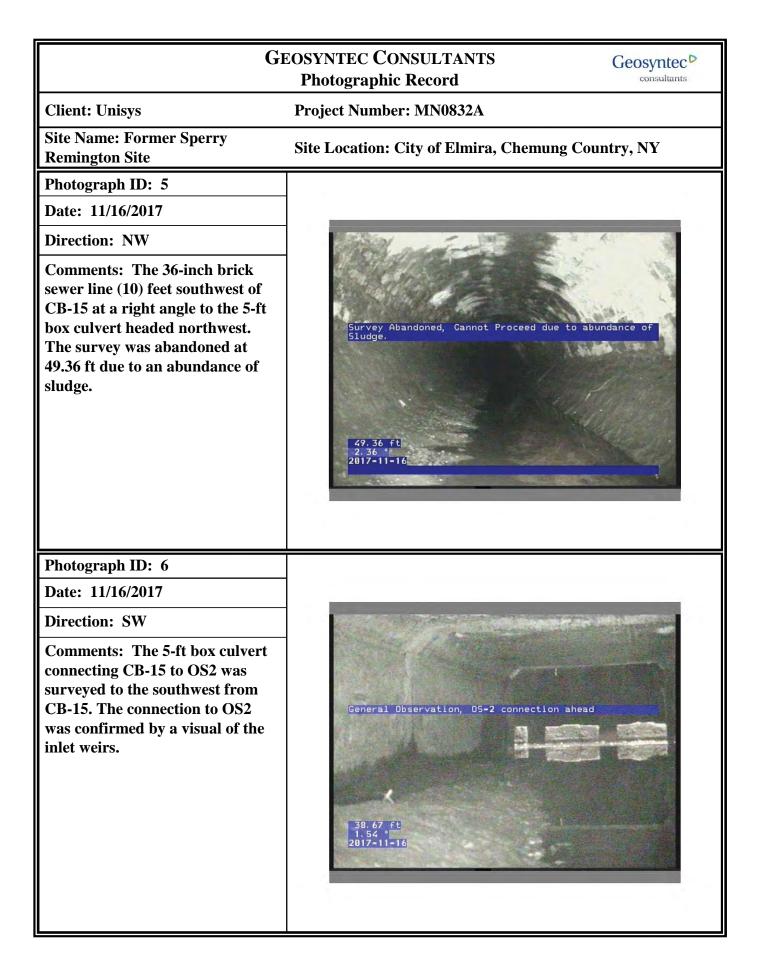
GEOSYNTEC CONSULTANTS Geosyntec Consultants Consultants		
Client: Unisys	Project Number: MN0832A	
Site Name: Former Sperry Remington Site	Site Location: City of Elmira, Chemung Country, NY	
Photograph ID: 13		
Date: 11/13/2017		
Direction: S		
<b>Comments:</b> TP-4.1, excavated northwest of CB-15. CB-15's metal ring is visible to the left of TP-4.1.		
Photograph ID: 14		
Date: 11/17/2017		
<b>Direction: E</b> <b>Comments:</b> Test Pit 4.2 was excavated to the southwest of TP- 4.1 to identify the location of the brick 36" connection to the 5-ft culvert connecting to OS2.		

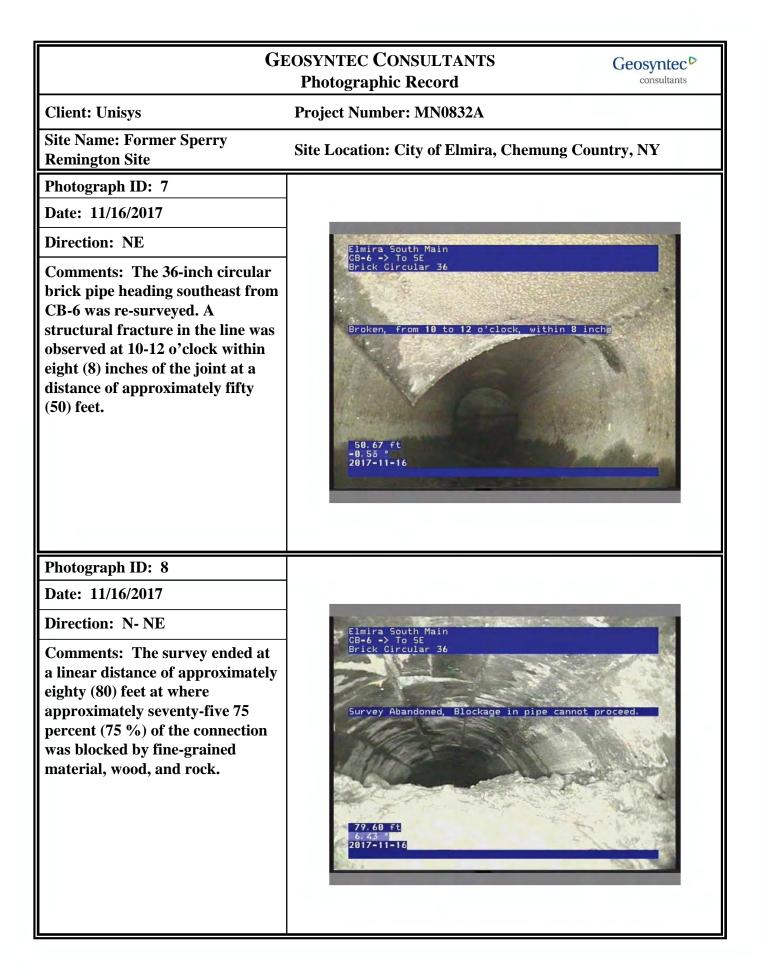
GEOSYNTEC CONSULTANTS Geosyntec Consultants Consultants		
Client: Unisys	Project Number: MN0832A	
Site Name: Former Sperry Remington Site	Site Location: City of Elmira, Chemung Country, NY	
Photograph ID: 15		
Date: 11/17/2017		
Direction: N/A		
<b>Comments:</b> Soil spoils collected from approximately 11 ft bgs in TP- 4.2. At 11 ft soil smelled like hydrocarbons and was visually stained.		
Photograph ID: 16		
Date: 11/17/2017		
Direction: N/A Comments: Excess soil spoils and plastic disposed of in the onsite Roll-off.		

Appendix F Camera Survey Video and Photographs

# **GEOSYNTEC CONSULTANTS** Geosyntec<sup>▷</sup> **Photographic Record** consultants **Client: Unisys** Project Number: MN0832A Site Name: Former Sperry Site Location: City of Elmira, Chemung Country, NY **Remington Site Photograph ID: 1** Date: 11/16/2017 **Direction: NE Comments: CB-15's northeast** connection, toward the railroad tracks, was observed to have been plugged with concrete. **Photograph ID: 2** Date: 11/16/2017 **Direction: NW Comments:** The connection leaving CB-15 headed northwest was constructed of clay tile and appeared to run parallel to the EHS property line.

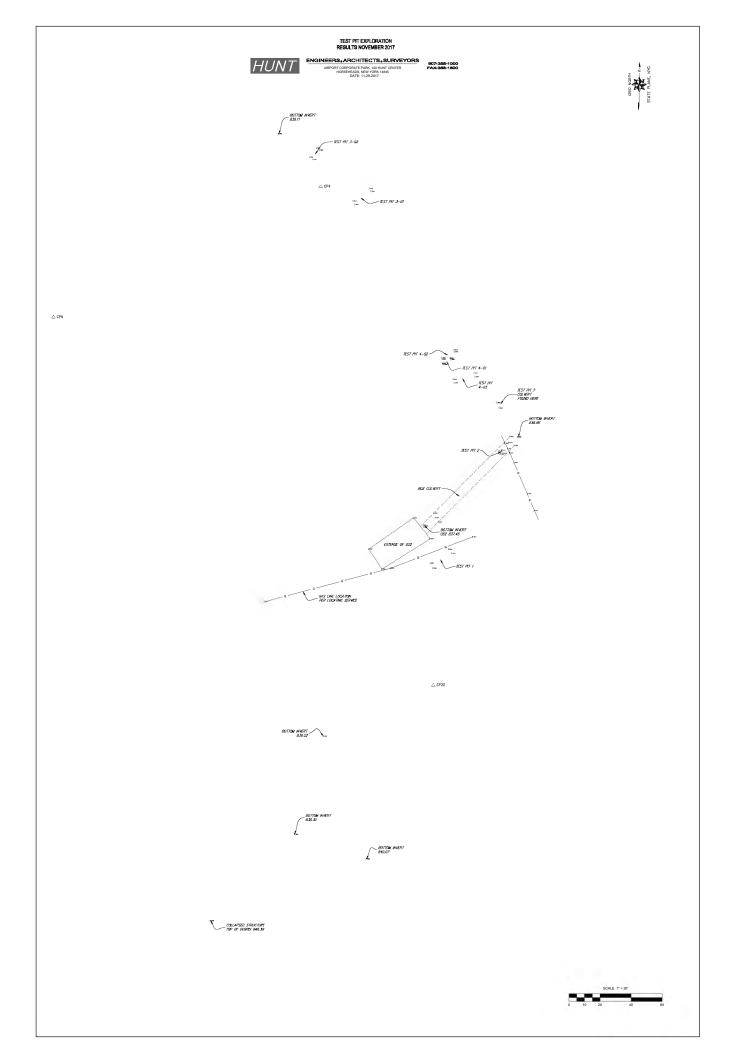
GEOSYNTEC CONSULTANTS Photographic Record Consultants		
Client: Unisys	Project Number: MN0832A	
Site Name: Former Sperry Remington Site	Site Location: City of Elmira, Chemur	ng Country, NY
Photograph ID: 3		
Date: 11/16/2017		
Direction: SW		
Comments: Looking from CB-15 toward OS-2, two connections were visible. The first connection to the southwest appeared to connect to OS2. A brick arch and 30-inch brick sewer line was observed on the right side of this connection approximately ten (10) feet southwest from CB-15.		
Photograph ID: 4		
Date: 11/16/2017		
Direction: NW Comments: The thirty-six-inch (36-in) sewer line was surveyed from CB-15 to the northwest 398.02. The survey was abandoned because of blockage (sand).	Survey Abandoned, Cannot Proceed with beyond obstacle. 398.02 ft 11.05 * 2017-11-16	th inspection





G	EOSYNTEC CONSULTANTS Photographic Record	
Client: Unisys	Project Number: MN0832A	
Site Name: Former Sperry Remington Site	Site Location: City of Elmira, Chemun	ng Country, NY
Photograph ID: 9		
Date: 11/16/2017		
Direction: N	Elmira South Main St. CB-10 <- To North	the state
Comments: The connection heading northeast from CB-10 was re-surveyed in attempt to survey the entire line. An opening to another structure was observed at a distance of approximately one hundred fifty-seven (157) feet and the survey was ended. Based on distance and location, that structure is considered to be OS2.	Glay Tile Gircular 24 Survey Abandoned, Gannot proceed du 155.86 ft -7.62 ° 2017-11-16	e to break

Appendix G Post-Investigation Survey



Appendix H Soil Boring Logs

Ge	osyn consu	Itec D				BORING OS-SI	
	scientists						
					PROJECT NAME Former Sperry	( Dominaton	
	NT Unis	MBER MN0832					
			COM	PLETED 4/23/18		EASTING 762776.722 ft	1.1
					GROUND ELEVATION		
		THOD _ Direct Push				-	
					UTILITY CONTRACTOR		
					LOGGED BY E.Buelow		
NOTE	S						_
DEPTH (ft)	RUN RECOVERY	REMARKS	GRAPHIC LOG		MATERIAL DESCRIPTION		DID (mdd)
		OC-SB-03-SUB-0-1		pitting.	to moist, light tan, non plastic, Note: gra GRADED SAND WITH SILT, dry to mois		3.7
	Y 1				SILT, black shiny material (ash), dry to	moist, dark brown, low plasticity,	
Ī		OC-SB-03-SUB-1-2		Fall back (gravel)			4.1
			MM		SILT, black shiny material (ash), dry to	moist, dark brown, low plasticity,	
- 5.0 — -	-						
7.5							
4							

	Unisys			PROJECT NAME Former Sperry Re	mington	
	NUMBER MN0832			PROJECT LOCATION Elmira, New	York	
DATE ST	ARTED 4/23/18	COM	PLETED 4/23/18	NORTHING		
DRILLER	Cascade Technical Servic	es, LLC		GROUND ELEVATION	BORING DIAMETER 2 in	
DRILLING	METHOD Direct Push			TOP OF CASING ELEVATION		
SAMPLIN	G METHOD 2" x 5' Macroo	core		UTILITY CONTRACTOR		_
	Geoprobe 6620DT			LOGGED BY E.Buelow	CHECKED BY A.Ranna	-
NOTES		1 1				_
DEPTH (ft) RUN	REMARKS	GRAPHIC LOG		MATERIAL DESCRIPTION		(mqq)
V	OC-SB-04-SUB-0-1		SILTY SAND WITH GRA	AVEL, dry to moist, dark brown, non plastic	;, with roots	
			WELL GRADED GRAVE	EL WITH SAND, dry, dark brown, coal frag	ments	2.9
Ţ	OC-SB-04-SUB-1-2		Loose, WELL GRADED brown to dark brown, gra	SAND WITH GRAVEL, fine gravel, with bl vel is composed of slag	ack shiny material (ash), moist,	3.4
4		XXXX	No recovery			
2.5 —			black shiny material	GRAVEL, dry, dark brown to black, compo	sed of foreign material slag and	
	OC-SB-04-SUB-2-4		WELL GRADED SAND,	dry to moist, dark brown to black		3
11		<u></u>	No recovery			
1			Loose, WELL GRADED	SAND, dry to moist, dark brown, soil is do	ninated by slag	<
5.0 -	OC-SB-04-SUB-4-6		Loose, WELL GRADED	GRAVEL, dark brown with orange, with sla	ag, coal, and black shiny material	4
11			No recovery			
T			Loose, WELL GRADED	SAND, coarse sand, moist, dark brown, sa	and composed of slag material	
7.5	OC-SB-04-SUB-6-8	R	Loose, WELL GRADED yellowish brown	GRAVEL WITH SAND, fine gravel, with co	parse sand, moist to wet, dark	3.9
		19	Loose, WELL GRADED	GRAVEL WITH SAND, coarse sand, wet,	dark brown, abundant slag	
				Bottom of borehole at 8.0 feet.		1

		altants				BORING OS-S PAGE	1 OF 1
CLIEN	IT_Uni	SVS		P	ROJECT NAME Former Sperry F	Reminaton	
		JMBER _ MN0832			ROJECT LOCATION _Elmira, Nev	•	
		<b>TED</b> 4/23/18	COM		IORTHING 753626.729 ft		1.1
		ETHOD Direct Push			OP OF CASING ELEVATION		
		METHOD 2" x 5' Macroo			TILITY CONTRACTOR		1.1
		Geoprobe 6620DT				CHECKED BY A.Ranna	1.1
NOTE	s		T T				-
DEPTH (ft)	RUN RECOVERY	REMARKS	GRAPHIC LOG		MATERIAL DESCRIPTION		(mqq)
-	X	OS-SB-05-SUB-0-1 (PCBs 5.732 mg/kg)			to moist, dark brown, low plasticity fine to medium sand, with black sh		72.2
_				Malling de la constant			
	V				oist, light tan brown, non plastic		
	X	OS-SB-05-SUB-1-2 (PCBs 5.341 mg/kg)		Medium dense, SILTY SAND, dark brown to black	fine to medium sand, with black sh	iny material (ash), dry to moist,	5
-					), fine to coarse sand, dark brown to	o orangeish black, orange color	
2.5 —				appears rusted			
2.5	V		6 6 6 6 6 6 6 6 6 6				
1		OS-SB-05-SUB-2-4 (PCBs 2.551 mg/kg)					12
			*****	No recovery	), fine to coarse sand, dark brown to	o orangeish black, composed	-
	Wei I		****	primarily of slag, orange color a		o orangolori black, composed	
	Y I		4 4 4 4 4 4 4 4 4 4 4 4 4 4 4				
5.0 —	1	OS-SB-05-SUB-4-6 (PCBs 2.274 mg/kg)	4 4 4 4 4 4 4 4 4 4 4 4 4 4 4				3.4
	1-	(FODS 2.214 Mg/Kg)	6 6 6 6 6 6 6 6 6 6 6 6 6 6 6				3.4
+			6664	No recovery			
_			0 0 0 0		) with block chiny motorial (act)	ry, dark brown to grou	-
			**************************************	LOOSE, WELL GRADED SAND	), with black shiny material (ash), d	iy, uark drown to gray	
÷			* * * * * * * * * * *				
	1	OS-SB-05-SUB-6-8	* * * * * * * * * * * * * * * * * * *				
	1	(PCBs 1.565 mg/kg)	*****	Loose, WELL GRADED SAND orangeish brown to dark brown	WITH GRAVEL, coarse sand, with	h fine gravel, moist to wet,	3.4
7.5			6 6 6 6 6 6 6 6 6 6 6 6 6	stangelen brown to dark brown			
1.1				No recovery			-
					Bottom of borehole at 8.0 feet.		

	const					PAGE	1 OF 1
	IT Uni			PF	ROJECT NAME _Former Sperry Re	minaton	
	-	IMBER MN0832			ROJECT LOCATION Elmira, New	•	
		ED 4/24/18	COM		ORTHING		1.1.1
		ETHOD Direct Push			OP OF CASING ELEVATION		
		IETHOD 2" x 5' Macroo					1.11
		Geoprobe 6620DT			DGGED BY _E.Buelow		
NOTE							
DEPTH (ft)	RUN RECOVERY	REMARKS	GRAPHIC LOG		MATERIAL DESCRIPTION		(mqq)
_	V		e e el b		l (ash), dry to moist, dark brown, lov		
ł		OS-SB-06-SUB-0-1 (PCBs 25.14 mg/kg)	4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4	WELL GRADED SAND WITH S black, low plasticity, coal, roots p	SILT, little black shiny material (ash) present	, dry to moist, dark brown to	1.9
i.		OS-SB-06-SUB-1-2 (PCBs 24.24 mg/kg)			WITH GRAVEL, fine to coarse grav material, slag, coal, and black shiny		2.4
 2.5 -		OS-SB-06-SUB-2-4 (PCBs 5.954 mg/kg)		dark brown to black, compositior	WITH GRAVEL, fine to coarse sand n is primarily slag and black shiny m		2.8
				No recovery			
- 5.0 — -		OS-SB-06-SUB-4-6 (PCBs 2.644 mg/kg)		WELL GRADED GRAVEL WIT composition is primarily slag and No recovery	H SAND, coarse sand, dark brown of black shiny material	with yellowish brown,	3.4
				WELL GRADED GRAVEL WIT and black shiny material	H SAND, coarse sand, dark brown,	composition is primarily slag	-
- 7.5		OS-SB-06-SUB-6-8 (PCBs 0.2414 mg/kg)					2.4
			.9.9				
					Bottom of borehole at 8.0 feet.		

Proj Date Drili Drili	E STAR	JMBER	_ COM	PLETED <u>4/24/18</u>	PROJECT NAME Former Sperry Rer PROJECT LOCATION Elmira, New NORTHING 753623.519 ft GROUND ELEVATION TOP OF CASING ELEVATION UTILITY CONTRACTOR	fork	
RIG T	YPE _	Geoprobe 6620DT			LOGGED BY E.Buelow		
DEPTH (ft)	RUN RECOVERY	REMARKS	GRAPHIC LOG		MATERIAL DESCRIPTION		(mqq)
	X	OS-SB-07-SUB-0-1 (PCBs 3.421 mg/kg)	0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	Medium dense, WELL GRA	plastic, silt and grass roots, some red bri DED SAND WITH SILT, fine to coarse s idant black shiny material, roots present	sand, with silt, fine to coarse	3.4
		OS-SB-07-SUB-1-2 (PCBs 3.561 mg/kg)		Medium dense, WELL GRA shiny material (ash), dry to n	DED SAND, fine to medium sand, with tooist, dark brown	fine to coarse gravel, and black	4.9
- 2.5 — -		OS-SB-07-SUB-2-4 (PCBs 1.82 mg/kg)		plastic	T WITH GRAVEL, dry to moist, dark bro	wn with reddish brown, non	8.1
- 5.0 —		OS-SB-07-SUB-4-6 (PCBs 0.5709 mg/kg)		moist, orangeish brown to da	D WITH GRAVEL, fine gravel, some bla ırk brown RAVEL, moist, orangeish brown	ck shiny material (ash), dry to	4.4
- - 7.5 _		OS-SB-07-SUB-6-8 (PCBs 0.2248 mg/kg)		Medium dense, POORLY G coarse gravel, dry to moist, c	GRAVEL, fine gravel, dry to moist, brow RADED SAND WITH GRAVEL, fine to rangeish brown AVEL WITH SAND, coarse sand, wet, c	medium sand, with fine to	4.7
- 0.1			X		Bottom of borehole at 8.0 feet.		

					PROJECT NAME _ Former Sperry Re	sminaton	
		JMBER MN0832			PROJECT LOCATION _Elmira, New	-	
		<b>TED</b> 4/24/18	COM		NORTHING 753632.1127 ft		ft
		ETHOD Direct Push			TOP OF CASING ELEVATION		
		IETHOD 2" x 5' Macroc			UTILITY CONTRACTOR		1.1.1
		Geoprobe 6620DT			LOGGED BY E.Buelow	CHECKED BY A.Ranna	
NOTE	S Ste	pped off to the NE becaus	se of refu	sal at OS-SB-07			
DEPTH (ft)	RUN RECOVERY	REMARKS	GRAPHIC LOG		MATERIAL DESCRIPTION		(mqq)
	X	OS-SB-08-SUB-0-1 (PCBs 3.304 mg/kg)	* * * * * * * * * * * * * * * * * * *	Medium dense, SILT, dry, bro WELL GRADED SAND WITH	own, roots present H SILT AND GRAVEL, dry to moist, br	rown to black	191.4
- -		OS-SB-08-SUB-1-2 (PCBs 1.531 mg/kg)		Medium dense, SILTY SAND abundant black shiny material	WITH GRAVEL, fine gravel, dry to m	oist, black to dark brown,	19.5
				Foreign material (coal)			-
2.5 —				Medium dense, POORLY GF brown	RADED SAND, with black shiny materi	ial (ash), dry to moist, dark	
-	T A	OS-SB-08-SUB-2-4 (PCBs 0.7022 mg/kg)		Dense, SANDY SILT WITH C concrete	GRAVEL, coarse gravel, moist, dark or	range, gravel is composed of	6.8
-	Å			No recovery			-
- 5.0 — -		OS-SB-08-SUB-4-6 (PCBs 0.0856 mg/kg)		Loose, WELL GRADED GRA	AVEL WITH SILT AND SAND, dry, ora	angeish gray	14.6
			-	No recovery			-
		OS-SB-08-SUB-6-8		Dense, WELL GRADED GR/ orangeish brown	AVEL WITH SILT AND SAND, fine to	coarse grained, dry to moist,	
- 7.5	1	(PCBs 0.07165 mg/kg)					7.5
-				Stiff, SANDY LEAN CLAY W moist to wet, dark brown, med	TH GRAVEL, clay, with fine to coarse dium plasticity Bottom of borehole at 8.0 feet.	e sand, and fine to coarse gravel,	
					Bottom of boronoid at 0.0 reet.		

PROJ	STAR	JMBER         MN0832           TED         4/23/18	COM	PLETED 4/23/18	PROJECT NAME       Former Sperry Remington         PROJECT LOCATION       Elmira, New York         NORTHING       753651.7012 ft       EASTING       762799.8013 ft		
drill Samp Rig t	LING MI PLING M YPE	ETHOD Direct Push	ore		GROUND ELEVATION        BORING DIAMETER 2 in         TOP OF CASING ELEVATION          UTILITY CONTRACTOR          LOGGED BY       E.Buelow         CHECKED BY       A.Ranna		
DEPTH (ft)	RUN RECOVERY	REMARKS	GRAPHIC LOG		MATERIAL DESCRIPTION		(mqq)
	X	OS-SUB-09-SUB-0-1		Loose, WELL GRADED SA	e to coarse gravel, dry to moist, dark gray ND WITH SILT, and black shiny material rpreted to be coal), roots present		5.4
		OS-SUB-09-SUB-1-2		Loose, WELL GRADED SA some slag and red brick	ND WITH SILT, few black shiny material	(ash), dry, dark gray brown,	5.2
- 2.5 —				Loose, WELL GRADED SA some black shiny material	ND, dry, dark gray brown, Composition a	ppears to primarily slag with	
	l I	OS-SUB-09-SUB-2-4			ND WITH SILT, dry, brown, and crushed ND WITH GRAVEL, fine to coarse sand, ry to moist, dark brown		4.1
				No recovery	Bottom of borehole at 4.0 feet.		
5.0							
7.5	с. С)						

	NT Uni	SVS		PROJECT NAME	Former Sperry Remington	
DATI DRIL DRIL	E STAR LER _C LING MI	ETHOD Direct Push	es, LLC	ETED _4/23/18 PROJECT LOCATION	Elmira, New York           60.715 ft         EASTING _762811.331 ft           DN         BORING DIAMETER _2 in           EVATION         EVATION	t
RIG 1 NOTE		Geoprobe 6620DT		LOGGED BY <u>E.Bu</u>	elow CHECKED BY A.Ranna	
DEPTH (ft)	RUN RECOVERY	REMARKS	GRAPHIC LOG	MATERIAL DE	ESCRIPTION	(mdd)
	X	OS-SB-10-SUB-0-1 (PCBs 87.31 mg/kg)		Stiff, SILT, moist, dark brown, low plasticity Loose, WELL GRADED GRAVEL, dry, gray Loose, WELL GRADED SAND WITH SILT, dry, c shiny material, orange discoloration in soil (appear With red brick	ark brown, non plastic, few coal , slag, and black s to be a weathering color)	111.2
		OS-SB-10-SUB-1-2 (PCBs 5.524 mg/kg)		No recovery		13.1
- 2.5		OS-SB-10-SUB-2-4 (PCBs 3.914 mg/kg)		Loose, WELL GRADED SAND WITH SILT, dry to coal, increasing moisture with depth	moist, dark brown, with red brick, wood, and	5.2
- - 5.0 —		OS-SB-10-SUB-4-6 (PCBs 5.411 mg/kg)		Loose, WELL GRADED SAND WITH SILT, dry to and red and yellow brick No recovery	moist, dark gray brown, with black shiny material	4.1
- - 7.5 _		OS-SB-10-SUB-6-8 (PCBs 0.2442 mg/kg)		Stiff, SILTY SAND WITH GRAVEL, coarse gravel concrete No recovery	, dry to moist, tan gray, with red brick and	2.1
		OS-SB-10-SUB-8-10 (PCBs 20.11 mg/kg)		Loose, SILTY SAND, dry, dark brown to gray, with refusal 8 ft, and hit refusal a second time at 9 ft) Bottom of borel		5.7

	sultants			BORING OS-S PAGE	<b>B-11</b> 1 OF 2
DATE STAF DRILLER _( DRILLING M SAMPLING	NUMBER	_ COMPLETED _4/23/18 es, LLC	GROUND ELEVATION BORING DIAMETER 2 in		
NOTES					
DEPTH (ft) RUN RECOVERY	REMARKS	GRAPHIC LOG	MATERIAL DESCRIPTION		(mqq) DIA
X	OS-SB-11-SUB-0-1 (PCBs 65.19 mg/kg)		, with black shiny material (ash), some, dry grained material is slag material	to moist, dark gray to black,	10.5
	OS-SB-11-SUB-1-2 (PCBs 24.21 mg/kg)				5.2
5	OS-SB-11-SUB-2-4 (PCBs 4.221 mg/kg)	Loose, WELL GRADED	/ITH GRAVEL, some fine gravel, moist, yel O SAND WITH GRAVEL, fine to coarse sar slag material, black shiny material		1.9
0-	OS-SB-11-SUB-4-6 (PCBs 2.961 mg/kg)		y to moist, dark brown, small brick fragmer		3.3
5_	OS-SB-11-SUB-6-8 (PCBs 1.067 mg/kg)	fragments)	) SAND WITH SILT, moist, dark brown, abi H GRAVEL, coarse gravel, moist, dark brov		2
	OS-SB-11-SUB-8-10 (PCBs 0.9208 mg/kg)	1434 4 AV	ND, dry to moist, dark brown, with crushed H GRAVEL, dry to moist, tan to light brown		1.6

	Consultants			BORING OS-S PAGE	<b>3B-11</b> 2 OF 2	
	NT <u>Un</u>	JMBER <u>MN0832</u>		PROJECT NAME Former Sperry Remington PROJECT LOCATION Elmira, New York		
FRO						
DEPTH (ft)	RUN RECOVERY	REMARKS	GRAPHIC LOG	MATERIAL DESCRIPTION	(mqq)	
1	OS-SB-11-SUB-10-12 (PCBs 0.1695 mg/kg)		Loose, WELL GRADED GRAVEL, coarse gravel, wet, brown, (wet gravel is interpreted to be the water table)		<b>-</b> 10.	
-	Π	(PCBs 0.1695 mg/kg)		No recovery	- 1.2	-
-				Bottom of borehole at 12.0 feet.		┢
12.5—						
-	-					
_						
-	-					
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15.0—						
-	-					
-	1					
-	1					
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17.5—	-					
-	1					
-	_					
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20.0	_					
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	CONSU CONSU	altants				BORING OS-S PAGE	<b>B-12</b> 1 OF 2
CLIEN	NT Uni	SVS		PROJEC	CT NAME Former Sperry Rem	inaton	
	-	JMBER MN0832			CT LOCATION Elmira, New Yo		
		<b>TED</b> 4/23/18	COM		NG 753672.491 ft		1.1.1
						BORING DIAMETER 2 in	
		ETHOD Direct Push			CASING ELEVATION		
		METHOD 2" x 5' Macroc		UTILITY			1.1
		Geoprobe 6620DT			D BY E.Buelow	CHECKED BY A Ranna	
		ter depth: approximately 1					
DEPTH (ft)	RUN RECOVERY	REMARKS	GRAPHIC LOG	M	ATERIAL DESCRIPTION		(mdd) Cld
	V			SILT, dry to moist, dark brown, low pl			
-		OS-SB-12-SUB-0-1	*****	Loose, WELL GRADED GRAVEL WI	TH SILT, fine gravel, dry to mois	st, tan	00.0
		(PCBs 196.7 mg/kg)		Medium dense, SANDY SILT, few gra	avel, with black shiny material (a	sh), dry to moist, dark brown,	28.9
4	$\rightarrow$					masterial (ask) druke maint	
	M	OS-SB-12-SUB-1-2		<ul> <li>Loose, POORLY GRADED SAND W dark brown to dark gray</li> </ul>	TH GRAVEL, SOME DIACK SNINY	material (asn), dry to moist,	
1.	A.	(PCBs 109.4 mg/kg)					25
				Medium dense, SILTY SAND WITH (	GRAVEL, fine gravel, moist, darl	k brown, low plasticity	
Ĩ				Becomes black			
2.5 —			-		<i></i>		-
	$\mathbf{V}$		a star	Stiff, CLAYEY GRAVEL WITH SAND low plasticity	, fine gravel, with clay, and sand	d, dry to moist, tannish brown,	
1		OS-SB-12-SUB-2-4 (PCBs 20.26 mg/kg)	4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4	Loose, WELL GRADED SAND WITH to dark brown, some crushed red brick		erial (ash), dry to moist, brown	22.1
-23			6°6°6°6°	No recovery (Hit refusal at 5 ft and ste	epped over)		
-				Loose, WELL GRADED SAND WITH (ash), moist, dark brown	GRAVEL, some construction d	ebris, with black shiny material	
5.0 —	T	OS-SB-12-SUB-4-6	444	Dense, SANDY SILT WITH GRAVEL brick	, few gravel, dry to moist, dark b	prown, non plastic, with orange	8.7
-				No recovery			0.7
	4		सरस्य	Loose, SILTY SAND, dry to moist, da	rk brown, with crushed brick		
-			111	Loose, WELL GRADED GRAVEL WI SANDY SILT WITH GRAVEL, fine to		( )·	-
		OS-SB-12-SUB-6-8		GARDT OLT WITH GRAVEL, IIIE U	ocaroc sana, ary to molor, orall	yolon tan	34.2
7.5 —	A			Medium stiff, SILT WITH SAND, fine gray, low plasticity	sand, with silt, and fine to coars	e gravel, dry to moist, tan	34.2
				Stiff, SANDY SILT WITH GRAVEL, fi	ne sand, dry to moist, tan browr	n, low plasticity	
		OS-SB-12-SUB-8-10					38.7
<u></u>			1	No recovery			

	consultants			BORING OS-S PAGE	BORING OS-SB-12 PAGE 2 OF 2		
CLIEN				PROJECT NAME _ Former Sperry Remington PROJECT LOCATION _ Elmira, New York		·	
-	RUN RECOVERY	REMARKS	GRAPHIC LOG	MATERIAL DESCRIPTION	(mqq) CIP		
-		OS-SB-12-SUB-10-12		SILTY SAND WITH GRAVEL, fine to coarse gravel, and black shiny material (ash), dry to moist, dark brown Dense, SILTY SAND WITH GRAVEL, fine to coarse gravel, tan brown, low plasticity CLAYEY GRAVEL, medium to coarse gravel, moist to wet, dark brown, medium plasticity No recovery (Wet soil is interpreted to be the water table at approximately 12 ft)	4.2	- <del>1</del> 0. - -	
-				Bottom of borehole at 12.0 feet.		╉	
- - 15.0 - -							
- 17.5— - -							
- 20.0 - 							

co	syntec msultants				BORING OS-SI	<b>B-13</b> 1 OF 1
	Unisvs		P	ROJECT NAME Former Sperry R	Reminaton	
	NUMBER MN0832			ROJECT LOCATION _Elmira, Nev	-	
	ARTED 4/23/18	COMP		ORTHING 753677.426 ft		1.1
					BORING DIAMETER 2 in	
	<b>METHOD</b> Direct Push					_
	IG METHOD 2" x 5' Macroo					1.1.1
	Geoprobe 6620DT				CHECKED BY A.Ranna	
	Refusal at 5', hit the Site Cu					
DEPTH (ft) RUN	אב שו רבשמארא שו רבשמארא שו שו	GRAPHIC LOG		MATERIAL DESCRIPTION		(mqq) DIq
V	OS-SB-13-SUB-0-1'		Medium dense, SANDY SILT, moist, dark brown, with roots Loose, SILTY SAND, little black shiny material (ash), moist, dark brown			
	03-36-13-306-0-1		Loose, SILTY SAND, little black	shiny material (ash), moist, dark t	prown	35.9
Ţ	OS-SB-13-SUB-1-2'		Loose, WELL GRADED SAND coarse gravel, dry to moist, dark		coarse sand, with silt, and fine to	16.6
- 41		******	No recovery			
2.5 —						
-	OS-SB-13-SUB-2-4'		Loose, WELL GRADED SAND orangeish brown to dark brown,	WITH SILT AND GRAVEL, with b crushed yellow and orange brick	lack shiny material (ash),	6.1
4			Loose, WELL GRADED SAND	WITH SILT AND GRAVEL, with b	lack shiny material (ash), moist,	
- A	OS-SB-13-SUB-4-6'		dark brown		1	
. /		XXXX	Red brick			
5.0		1	No sample (Hit refusal at 5 ft, in away from the culvert)	nterpreted to be the top of the Site	Culvert insufficient space to move	7.9
-				Refusal at 5.0 feet. Bottom of borehole at 5.0 feet.		

Appendix I Construction Drawings Appendix J Approvals from Property Owners



Kevin C. Murphy <u>kmurphy@wladislawfirm.com</u>

June 6, 2019

<u>Via E-Mail and U.S. Mail</u> Michael Murphy Beveridge & Diamond, P.C. 477 Madison Avenue, 15th Floor New York, New York 10022

> Re: Revised Interim Remedial Measures Work Plan Former Sperry Remington Site #808043, Elmira, Chemung County

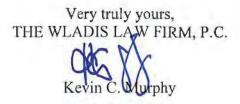
Dear Mr. Murphy,

As you know, I represent Southern Tier Commerce Center (Southern Tier), the owner of the parcel on which most, if not all, of the work proposed in the referenced Interim Remedial Measures work will be performed. Southern Tier has reviewed the existing and prior drafts of the subject work plan and communications between Unisys and NYSDEC. I write in response to the first two General Comments set out in the NYSDEC comment letter dated January 30, 2019.

Regarding General Comment #1, Southern Tier has no objection to and will permit Unisys to implement the drainage modifications proposed in the subject Work Plan.

Regarding General Comment # 2, Southern Tier understands that, as set forth in the Work Plan, Unisys, through cleaning and possibly re-cleaning, will undertake reasonable efforts to meet TSCA thresholds (porous and non-porous) for any OS2 structural components left in place. With that understanding, Southern Tier is familiar with and has no standing objection to the potential need for post-remediation institutional and/or engineering controls in accordance with 40 CFR 761. That being said, Southern Tier cannot commit or agree today to institutional or engineering controls, the specific details of which have not yet been determined. If, following the completion of all necessary and appropriate remedial measures, institutional or engineering controls are determined to be necessary and appropriate, Southern Tier will review the available data and information, the proposed controls, and thereafter, make a final decision regarding the then-proposed controls.

Please contact me if any further clarification is required at this time.



KCM/mms

# **Elmira City School District**



Hillary J. Austin Superintendent of Schools Administration Building 951 Hoffman Street Elmira, NY 14905

Phone: (607) 735-3010 Fax: (607) 735-3009 haustin@elmiracityschools.com

April 2, 2019

Aron Krasnopoler Beech and Bonaparte Engineering, P.C. 10211 Wincopin Circle, 4<sup>th</sup> Floor Columbia, MD 21044

Dear Mr. Krasnopoler,

The proposed EHS Stormwater modifications-#808043 IRM presented in your March 29, 2019 email and accompanying attachment labeled MN0832A-008 Site Plan- EHS Area are acceptable; however, if the area to be regraded is mulch/soil/grass, the soils used for fill in this area must meet the Unrestricted Use standards presented in Appendix 5 of DER-10, not the Restricted Residential standards referenced in the note on the drawing.

Sincerely,

Hillary J. Austin Superintendent of Schools

HJA:km

Appendix K ECSD SPDES Permit Appendix L Community Air Monitoring Plan

#### Appendix 1A New York State Department of Health Generic Community Air Monitoring Plan

#### Overview

A Community Air Monitoring Plan (CAMP) requires real-time monitoring for volatile organic compounds (VOCs) and particulates (i.e., dust) at the downwind perimeter of each designated work area when certain activities are in progress at contaminated sites. The CAMP is not intended for use in establishing action levels for worker respiratory protection. Rather, its intent is to provide a measure of protection for the downwind community (i.e., off-site receptors including residences and businesses and on-site workers not directly involved with the subject work activities) from potential airborne contaminant releases as a direct result of investigative and remedial work activities. The action levels specified herein require increased monitoring, corrective actions to abate emissions, and/or work shutdown. Additionally, the CAMP helps to confirm that work activities did not spread contamination off-site through the air.

The generic CAMP presented below will be sufficient to cover many, if not most, sites. Specific requirements should be reviewed for each situation in consultation with NYSDOH to ensure proper applicability. In some cases, a separate site-specific CAMP or supplement may be required. Depending upon the nature of contamination, chemical- specific monitoring with appropriately-sensitive methods may be required. Depending upon the proximity of potentially exposed individuals, more stringent monitoring or response levels than those presented below may be required. Special requirements will be necessary for work within 20 feet of potentially exposed individuals or structures and for indoor work with co-located residences or facilities. These requirements should be determined in consultation with NYSDOH.

Reliance on the CAMP should not preclude simple, common-sense measures to keep VOCs, dust, and odors at a minimum around the work areas.

#### Community Air Monitoring Plan

Depending upon the nature of known or potential contaminants at each site, real-time air monitoring for VOCs and/or particulate levels at the perimeter of the exclusion zone or work area will be necessary. Most sites will involve VOC and particulate monitoring; sites known to be contaminated with heavy metals alone may only require particulate monitoring. If radiological contamination is a concern, additional monitoring requirements may be necessary per consultation with appropriate DEC/NYSDOH staff.

**Continuous monitoring** will be required for all <u>ground intrusive</u> activities and during the demolition of contaminated or potentially contaminated structures. Ground intrusive activities include, but are not limited to, soil/waste excavation and handling, test pitting or trenching, and the installation of soil borings or monitoring wells.

**Periodic monitoring** for VOCs will be required during <u>non-intrusive</u> activities such as the collection of soil and sediment samples or the collection of groundwater samples from existing monitoring wells. "Periodic" monitoring during sample collection might reasonably consist of taking a reading upon arrival at a sample location, monitoring while opening a well cap or

overturning soil, monitoring during well baling/purging, and taking a reading prior to leaving a sample location. In some instances, depending upon the proximity of potentially exposed individuals, continuous monitoring may be required during sampling activities. Examples of such situations include groundwater sampling at wells on the curb of a busy urban street, in the midst of a public park, or adjacent to a school or residence.

### VOC Monitoring, Response Levels, and Actions

Volatile organic compounds (VOCs) must be monitored at the downwind perimeter of the immediate work area (i.e., the exclusion zone) on a continuous basis or as otherwise specified. Upwind concentrations should be measured at the start of each workday and periodically thereafter to establish background conditions, particularly if wind direction changes. The monitoring work should be performed using equipment appropriate to measure the types of contaminants known or suspected to be present. The equipment should be calibrated at least daily for the contaminant(s) of concern or for an appropriate surrogate. The equipment should be capable of calculating 15-minute running average concentrations, which will be compared to the levels specified below.

1. If the ambient air concentration of total organic vapors at the downwind perimeter of the work area or exclusion zone exceeds 5 parts per million (ppm) above background for the 15-minute average, work activities must be temporarily halted and monitoring continued. If the total organic vapor level readily decreases (per instantaneous readings) below 5 ppm over background, work activities can resume with continued monitoring.

2. If total organic vapor levels at the downwind perimeter of the work area or exclusion zone persist at levels in excess of 5 ppm over background but less than 25 ppm, work activities must be halted, the source of vapors identified, corrective actions taken to abate emissions, and monitoring continued. After these steps, work activities can resume provided that the total organic vapor level 200 feet downwind of the exclusion zone or half the distance to the nearest potential receptor or residential/commercial structure, whichever is less - but in no case less than 20 feet, is below 5 ppm over background for the 15-minute average.

3. If the organic vapor level is above 25 ppm at the perimeter of the work area, activities must be shutdown.

4. All 15-minute readings must be recorded and be available for State (DEC and NYSDOH) personnel to review. Instantaneous readings, if any, used for decision purposes should also be recorded.

## Particulate Monitoring, Response Levels, and Actions

Particulate concentrations should be monitored continuously at the upwind and downwind perimeters of the exclusion zone at temporary particulate monitoring stations. The particulate monitoring should be performed using real-time monitoring equipment capable of measuring particulate matter less than 10 micrometers in size (PM-10) and capable of integrating over a period of 15 minutes (or less) for comparison to the airborne particulate action level. The equipment must be equipped with an audible alarm to indicate exceedance of the action level. In addition, fugitive dust migration should be visually assessed during all work activities.

1. If the downwind PM-10 particulate level is 100 micrograms per cubic meter  $(mcg/m^3)$  greater than background (upwind perimeter) for the 15-minute period or if airborne dust is observed leaving the work area, then dust suppression techniques must be employed. Work may continue with dust suppression techniques provided that downwind PM-10 particulate levels do not exceed 150 mcg/m<sup>3</sup> above the upwind level and provided that no visible dust is migrating from the work area.

2. If, after implementation of dust suppression techniques, downwind PM-10 particulate levels are greater than 150 mcg/m<sup>3</sup> above the upwind level, work must be stopped and a re-evaluation of activities initiated. Work can resume provided that dust suppression measures and other controls are successful in reducing the downwind PM-10 particulate concentration to within 150 mcg/m<sup>3</sup> of the upwind level and in preventing visible dust migration.

3. All readings must be recorded and be available for State (DEC and NYSDOH) and County Health personnel to review.

December 2009

Appendix M Project Schedule

248 hittal 0 dd hi	8 days Wed 11,           lays         Wed 11,           days         Thu 11/           lays         Fri 6/28,           days         Mon 7/2           lays         Mon 9/2           ays         Mon 10/           ays         Fri 10/18           days         Mon 10,           days         Mon 10,           days         Mon 10,           lays         Mon 10,           lays         Mon 10,           lays         Mon 10,           lays         Mon 10,	7718 Tue 12/24/19 7718 Fri 10/18/19 77/18 Fri 10/18/19 77/18 Wed 11/7/18 8/18 Wed 1/30/19 /19 Fri 6/28/19 16/19 Mon 9/16/19 16/19 Mon 10/7/19 /19 Fri 10/18/19 7/19 Mon 10/7/19 /19 Fri 10/18/19 7/11/Wed 4/22/20 (21/1 Fri 11/1/19 5/19 Fri 11/15/19 29/15 Thu 10/31/15	IRM OS2 Work Plan Submittal Revised Work Plan Submittal NYSDEC Conditional Approval Revised Work Plan Submittal NYSDEC Approval and NTP IRM Contractor Mobilization
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