

Honeywell  
301 Plainfield Road  
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Syracuse, NY 13212  
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June 18, 2014

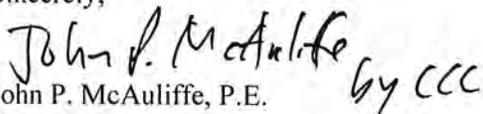
To: Holly Sammon, Onondaga County Public Library (1 bound)  
Samuel Sage, Atlantic States Legal Foundation (1 bound)  
Joseph J. Heath, Esq., Onondaga Nation (cover letter only)  
Diane Carlton, NYSDEC Region 7 (1 pdf)  
Chris Fitch, Communications

Re: Letter of Transmittal – Semet Residue Ponds Repository Addition

The below document has been approved by the New York State Department of Environmental Conservation (NYSDEC) and is enclosed for your document holdings:

- Semet Residue Ponds – Demonstration Program Work Plan Addendum dated June 2, 2014

Sincerely,

  
John P. McAuliffe, P.E. *by CCC*  
Program Director, Syracuse

Enc.

cc: Tracy A. Smith - NYSDEC

**New York State Department of Environmental Conservation**  
**Division of Environmental Remediation**  
**Remedial Bureau D, 12th Floor**  
625 Broadway, Albany, New York 12233-7013  
Phone: (518) 402-9676 • Fax: (518) 402-9020  
Website: [www.dec.ny.gov](http://www.dec.ny.gov)



June 10, 2014

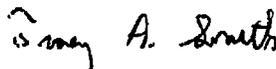
Mr. John P. McAuliffe, P.E.  
Honeywell International, Inc.  
301 Plainfield Road  
Suite 330  
Syracuse, NY 13212

**Re: Semet Residue Ponds  
Demonstration Program WP Addendum**

Dear Mr. McAuliffe:

The New York State Department of Environmental Conservation (NYSDEC) has completed its review of the "Semet Residue Ponds - Demonstration Program Work Plan Addendum" (work plan) submitted in your letter dated June 2, 2014. Based on our review, the work plan is approved. Please note that as discussed with Paul Schultz of O'Brien & Gere, the start date for this work is anticipated to be June 23<sup>rd</sup> instead of June 9<sup>th</sup> as stated in the work plan. If you have any questions regarding these comments, please contact me at 518-402-9796.

Sincerely,



Tracy A. Smith  
Project Manager

ecc: J. Gregg, NYSDEC  
M. Sergott, NYSDOH  
J. Heath, Esq.  
H. Warner, NYSDEC  
P. Schultz, OBG

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S. Miller, Honeywell

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June 2, 2014

Mr. Tracy Smith  
Division of Environmental Remediation  
Remedial Bureau D  
New York State Department of Environmental Conservation  
625 Broadway  
Albany, NY 12233-7013

Re: **Semet Residue Ponds Site**  
**Order on Consent: Index #D7-0005-01-09**  
**Semet Residue Demonstration Program**

Dear Mr. Smith:

This letter serves as the Demonstration Program Work Plan Addendum associated with Operable Unit 1 (OU1) of the Semet Residue Ponds Site (the Site) located in the Town of Geddes, Onondaga County, New York. This Demonstration Program is subsequent to the previous remedy selection treatability studies (RSTs) conducted to support remedy selection for the Focused Feasibility Study (FFS) required under Administrative Consent Order (ACO) D7-0005-01-09 entered into by Honeywell International, Inc. (Honeywell), and the New York State Department of Environmental Conservation (NYSDEC) dated January 22, 2004.

The Demonstration Program Work Plan Addendum is intended to be an addendum to the Expanded Remedy Selection Treatability Study (ERSTS) Work Plan Addendum that was submitted to NYSDEC in May 2012 and approved by NYSDEC on June 15, 2012, and is anticipated to provide critical remedy refinements needed to finalize remedy selection. The Demonstration Program will further evaluate removal, shipment, and off-site thermal treatment.

#### **Demonstration Program Objectives**

During the ERSTS, Semet Residue from Ponds 1, 2, and 5 was successfully excavated and direct loaded to shipping containers during dry summer weather.

The objectives of the Demonstration Program are as follows:

- Refine removal and direct loading process at Ponds 1, 2, and 5 and identify and address constraints to dump trailer and equipment access.
- Evaluate downtime as a result of wind direction and weather conditions over a longer duration of time (17-week period).
- Evaluate scheduling and staging of dump trailers to meet weekly production targets.
- Evaluate equipment production rates as a result of various excavation methods and equipment configurations.
- Continue to evaluate odor/emission management using spray covers over a longer duration.

### **Demonstration Program Implementation**

Field work is expected to begin June 9, 2014, and is anticipated to be similar to the field work performed as part of the approved ERSTS; the actual work performed will be weather and outlet vendor dependent. A process flow diagram for removal, direct loading and shipping is presented as Attachment A. Removal of Semet Residue from Ponds 1, 2, and 5 is expected to be done with a tracked, long reach excavator. The excavator will load dump trailers double-lined with plastic. Each dump trailer will contain a minimum of 23 tons of Semet Residue. Once the dump trailer is considered full based on estimated weights using portable scales, the Semet Residue surface in the dump trailer will be sprayed with a cover material (e.g., cement-based or fiber-based cover) and the plastic liners will be folded onto the surface. The dump trailer weather cover will then be secured. Decontamination of truck tires, as necessary, will be performed prior to off-site transport. Semet Residue will be shipped and managed off-site in accordance with applicable state and federal regulations. Excavation and loading operations are expected to be from June 9, 2014 to September 26, 2014, with an approximate two and half-week shutdown for the New York State Fair (approximately August 18 to September 3, 2014). A site plan indicating the expected excavation/loading areas and expected site traffic pattern is presented as Attachment B.

It is expected that approximately 3,000 tons of directed-loaded Semet Residue will be transported by truck to the selected off-site T&D company for use as fuel at their cement kiln plant.

Equipment and materials purchased and rented for implementation of the Demonstration Program are intended to be similar to those utilized during the previous RSTs.

### ***Health and Safety***

Health and safety procedures will be in accordance with the Honeywell Syracuse Portfolio Health and Safety Program (HSP2). Additionally, elements of the Harbor Brook/Wastebed B RI/FS Health and Safety Plan will be used during execution of this Work Plan Addendum along with specific JSA requirements. The JSA to be implemented for the Demonstration Program is similar to the JSA implemented for the ERSTS included as Appendix B of the ERSTS Work Plan Addendum.

### ***Community Air Monitoring***

The Community Air Monitoring Plan (CAMP) used for the ERSTS will be implemented for the Demonstration Program.

### ***Decontamination***

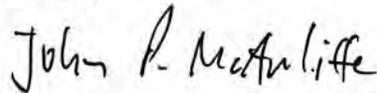
Daily decontamination of the workers may be required for which a decontamination trailer with showers is included.

Prior to demobilization from the site, construction, sampling, and processing equipment will be decontaminated using high pressure hot water at the decontamination pad constructed for the Tributary 5A project.

Mr. Tracy Smith  
June 2, 2014  
Page 3

Please contact Paul Schultz of O'Brien & Gere or me if you have any questions regarding this matter.

Sincerely,



John P. McAuliffe, P.E.  
Program Director

*by CCC*

(Electronic Only)

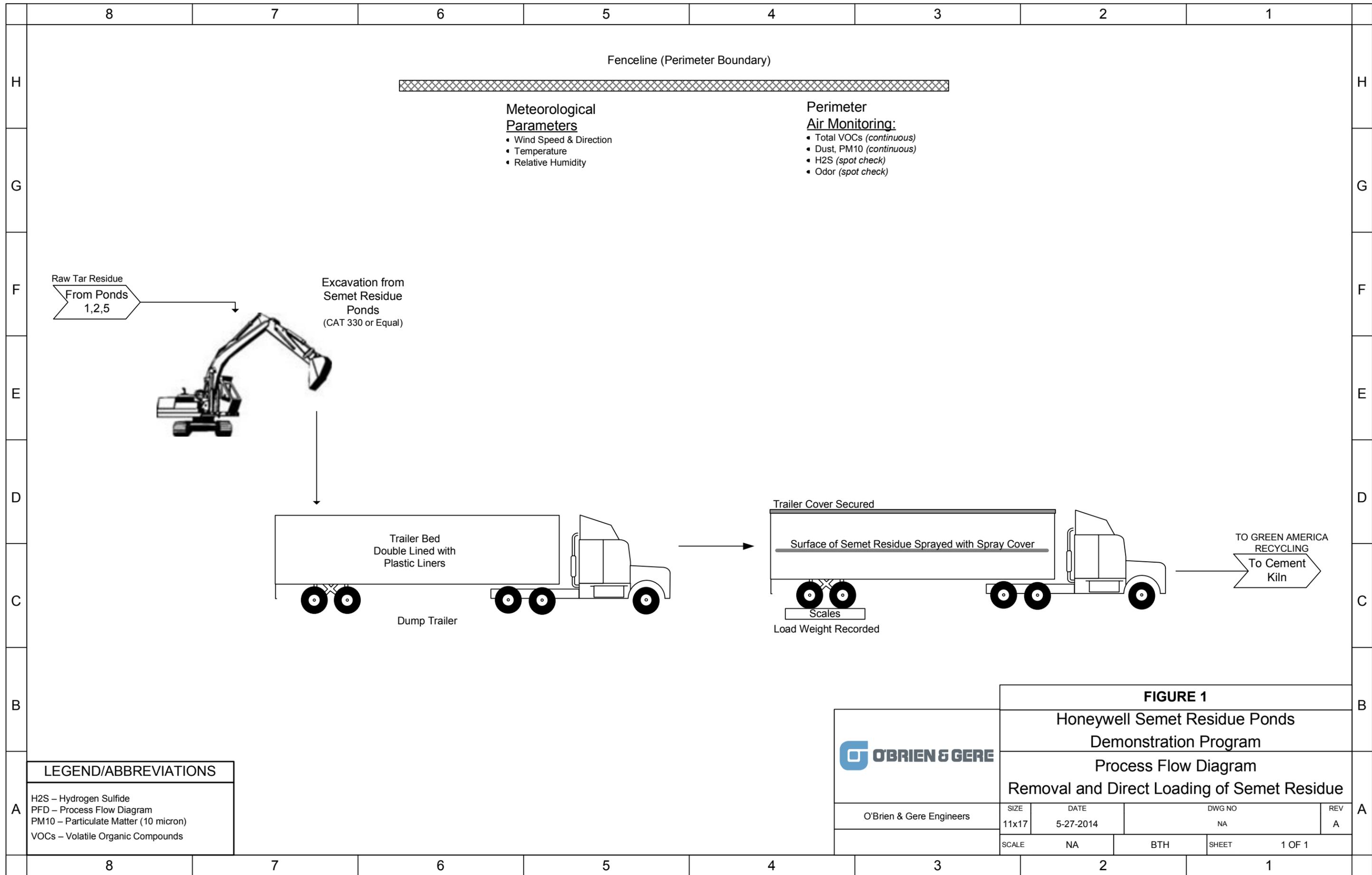
**ATTACHMENTS**

Attachment A – Demonstration Program Process Flow Diagram

Attachment B – Demonstration Program Site Plan

cc:	Robert Nunes	USEPA (ec)
	Tom Mongelli	USEPA (ec)
	Harry Warner	NYSDEC Region 7 (ec)
	Mark Sergott	NYSDOH (ec)
	Margaret A. Sheen, Esq.	NYSDEC, Region 7 (ec)
	Argie Cirillo, Esq.	USEPA (ec)
	Brian D. Israel, Esq.	Arnold & Porter (ec)
	Joseph Heath, Esq.	(ec)
	Thane Joyal, Esq.	(ec)
	Jeanne Shenandoah	Onondaga Nation (ec)
	Curtis Waterman	HETF (ec)
	Alma Lowry	(ec)
	William Hague	Honeywell (ec)
	Steve Miller	Honeywell (ec)
	Christopher C. Calkins	O'Brien & Gere (ec)
	Bradley Kubiak	O'Brien & Gere (ec)
	John Formoza	OMI (ec)

*Attachment A –  
Demonstration Program  
Work Plan Addendum  
Process Flow Diagram*



LEGEND/ABBREVIATIONS	
H2S	– Hydrogen Sulfide
PFD	– Process Flow Diagram
PM10	– Particulate Matter (10 micron)
VOCs	– Volatile Organic Compounds

<b>FIGURE 1</b>				
Honeywell Semet Residue Ponds Demonstration Program				
Process Flow Diagram Removal and Direct Loading of Semet Residue				
O'Brien & Gere Engineers	SIZE	DATE	DWG NO	REV
	11x17	5-27-2014	NA	A
SCALE	NA	BTH	SHEET	1 OF 1

*Attachment B –  
Demonstration Program  
Work Plan Addendum  
Site Plan*



# ATTACHMENT B

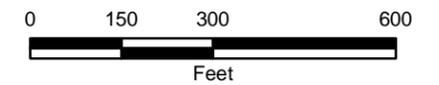


## LEGEND

-  APPROXIMATE EXCAVATION/REMOVAL
-  EXPECTED SITE TRAFFIC PLAN
-  DECON AREA
-  PERIMETER AIR MONITORING BOUNDARY
-  APPROXIMATE POND AREAS CONTAINING SEMET RESIDUE

HONEYWELL  
SEMET RESIDUE PONDS SITE  
GEDDES, NEW YORK

## DEMONSTRATION PROGRAM



MAY 2014  
1163.51482

