

## Forensic Environmental Services, Inc.

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Exton, Pennsylvania 19341

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April 10, 2019

Christopher O'Neill, P.E.  
NYS Dept. of Environmental Conservation  
Division of Environmental Remediation  
1130 North Westcott Road  
Schenectady, NY 12306-2014

**RE: Supplemental Site Investigation Workplan Addendum  
Former Norton Company (Restoration Site) - NYSDEC No. 401010  
Crabapple Lane, Colonie, NY 12212  
EPA ID No.: NYD 002083954**

Dear Mr. O'Neill

Forensic Environmental Services, Inc. (FES), on behalf of Saint-Gobain Corporation (Saint-Gobain), has prepared this *Supplemental Site Investigation (SSI) Workplan Addendum* for the former Norton Company Restoration Site in Colonie, New York in response to your April 9, 2019 technical review correspondence on the *Supplemental Site Investigation Workplan and Proposed Enhanced Fluid Recovery (EFR) Activities* letter report dated March 29, 2019 (see Attachment 1). As described in the March 2019 workplan/report, proposed supplemental site investigation and continued remedial activities at the site include: 1) the installation of two additional temporary wells proximal to newly-installed monitoring well MW-22S; 2) the installation of one conventional overburden monitoring well downgradient of existing monitoring well W-421; 3) a second Enhanced Fluid Recovery (EFR) event at monitoring well W-421; 4) associated soil and groundwater sampling; and 5) preparation of a supplemental site investigation summary report. Proposed monitoring well locations are presented in Figure 1.

Specific comments identified by the NYSDEC in the April 9, 2019 correspondence are presented below in bold/italics with the corresponding FES/Saint-Gobain responses.

- 1. Page 6 of the March 2019 SSI and EFR Plan describes the proposed reduction in the Community Air Monitoring Program (CAMP) as compared to previous approved site activities. The lack of CAMP exceedances during past site work does not negate the potential for air-borne contaminant exposures during future investigative or remedial activities. The previously-approved CAMP procedures need to be continued for all ground-intrusive activities, including the EFR work and the installation of soil borings and monitoring wells/points.***

CAMP activities will be conducted during all applicable ground intrusive and sampling activities (i.e., soil boring and monitoring well installation, and EFR activities) in accordance with the procedures outlined in the NYSDEC-approved *In-Situ Chemical Oxidation (ISCO) and Contingent EFR Pilot Testing Work Plan Addendum* (FES, May 11, 2017), as well as the New York State Department of Health (NYSDOH) and NYSDEC technical review correspondence dated June 1 and June 6, 2017, respectively. Any CAMP exceedances will be immediately reported to the NYSDEC and NYSDOH and appropriate corrective measures will be taken to reduce the potential for exposure. A summary of the CAMP monitoring activities will be presented in the supplemental site investigation summary report.

- 2. The 2018 Landfill Compliance Report provided 1,4-dioxane data and groundwater contour figures from the December 2018 groundwater sampling event. The December 2018 data indicates a groundwater concentration in monitoring well MW-3S of 3.4 µg/L for 1,4-dioxane. One additional temporary shallow groundwater monitoring point is hereby requested easterly from MW-3S toward the offsite residential area to further delineate the 1,4-dioxane presence near MW-3S. This additional well point will need to be installed and sampled similarly to those temporary well points (TWP-5 and TWP-6) proposed for the MW-22S area as part of the March 2019 SSI and EFR Plan.***

Saint-Gobain and FES concur with the requirement to install an additional monitoring well east (downgradient) of monitoring well MW-3S to further evaluate 1,4-Dioxane concentrations in groundwater; however, in lieu of a temporary monitoring point, a permanent (conventionally-installed) monitoring well is proposed (see Figure 1). The proposed monitoring well (MW-24S) will be installed via standard hollow-stem auger (HSA) drilling methods and constructed of Schedule 40, 2-inch diameter PVC materials. The well screen (0.020 inch slot) will be installed across the water table to allow for any seasonal fluctuations. Clean silica sand (#1 or #2) will be used to fill the well annulus to at least one foot above the top of the screened interval. A bentonite seal will be installed above the gravel pack to prevent surface infiltration, and the remaining well annulus will be grouted to surface. The wellhead will be finished with a stick-up vault secured by a 2-foot by 2-foot concrete skirt and equipped with a locking gripper-plug to prevent unauthorized access. Additional details on the proposed monitoring well installation activities (waste disposal, well development, etc.) will be consistent with the March 29, 2019 *Supplemental Site Investigation Workplan and Proposed EFR Activities* letter report.

- 3. For comparison purposes, existing shallow groundwater monitoring well MW-3S will need to be included in the groundwater sampling events proposed in the March 2019 SSI and EFR Plan.***

Chris O'Neill  
April 10, 2019  
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In addition to all newly-installed monitoring wells (see Figure 1), existing well MW-3S will be included in the 2019 sampling events. Sampling activities will be conducted in accordance with the procedures outlined in the March 29, 2019 *Supplemental Site Investigation Workplan and Proposed EFR Activities* letter report.

Subsequent to the NYSDEC/NYSDOH review and approval of this addendum, field activities will be scheduled as soon as possible. FES will notify NYSDEC/NYSDOH in advance of any proposed field/sampling activities. If you would like to discuss the proposed activities or have any questions, please call us at (610) 594-3940 or Jim Smith of Saint-Gobain at (610) 893-5667.

Sincerely,

FORENSIC ENVIRONMENTAL SERVICES, INC.



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Bryan J. Machella  
Senior Project Manager



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Thomas F. Maguire, PG  
President

cc: James Smith, Saint-Gobain  
Rick Mustico, P.E., NYSDEC  
Dusty Tinsley, NYSDEC  
Sara Bogardus, NYSDOH  
S. McLaughlin, NYSDOH  
J. Deming, NYSDOH

## **FIGURES**



**Legend**

- Proposed Temporary Wells
- Proposed Monitoring Wells
- ⊕ Monitoring Wells
- SW Sample
- ▭ Slurry Wall

Forensic Environmental Services, Inc.	Fig: 1
Locations of Proposed Monitoring and Temporary Wells Former Norton Co. Restoration Site - Colonie, NY	
0    45    90    180 Feet	Drawn By: MBK Updated: 4/10/2019
	Approved By: BM

**ATTACHMANT 1**

**APRIL 9, 2019 NYSDEC CORRESPONDENCE**

# NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Division of Environmental Remediation, Region 4  
1130 North Westcott Road, Schenectady, NY 12306-2014  
P: (518) 357-2045 | F: (518) 357-2460  
www.dec.ny.gov

April 9, 2019

Mr. James Smith  
Manager, Environmental Programs  
Saint-Gobain Corporation  
750 East Swedesford Road  
Valley Forge, PA 19482

RE: Norton Company, Town of Colonie, Site # 401010  
SSI and EFR Plan and 1,4-Dioxane Data

Dear Mr. Smith:

The New York State Department of Environmental Conservation (NYSDEC) and the New York State Department of Health (NYSDOH) have reviewed the March 29, 2019 "Supplemental Site Investigation Workplan and Proposed Enhanced Fluid Recovery (EFR) Activities" document (March 2019 SSI and EFR Plan) for the Norton Company closed landfill site (site #401010). NYSDEC/NYSDOH have also reviewed the "2018 Landfill Compliance Report" dated February 11, 2019. Both the March 2019 SSI and EFR Plan and the 2018 Landfill Compliance Report were submitted on behalf of Saint-Gobain Corporation by Forensic Environmental Services, Inc.

NYSDEC/NYSDOH have the following comments on the March 2019 SSI and EFR Plan and the 2018 Landfill Compliance Report.

- i. Page 6 of the March 2019 SSI and EFR Plan describes the proposed reduction in the Community Air Monitoring Program (CAMP) as compared to previous approved site activities. The lack of CAMP exceedances during past site work does not negate the potential for air-borne contaminant exposures during future investigative or remedial activities. The previously-approved CAMP procedures need to be continued for all ground-intrusive activities, including the Enhanced Fluid Recovery (EFR) work and the installation of soil borings and monitoring wells/points.
- ii. The 2018 Landfill Compliance Report provided 1,4-dioxane data and groundwater contour figures from the December 2018 groundwater sampling event. The December 2018 data indicates a groundwater concentration in monitoring well MW-3S of 3.4 µg/L for 1,4-dioxane. One additional temporary shallow groundwater monitoring point is hereby requested easterly from MW-3S toward the offsite residential area to further delineate the 1,4-dioxane presence near MW-3S. This additional well point will need to be installed and sampled similarly to those temporary well points (TWP-5 and TWP-6) proposed for the MW-22S area as part of the March 2019 SSI and EFR Plan. (See the attached figures for further information.)
- iii. For comparison purposes, existing shallow groundwater monitoring well MW-3S will need to be included in the groundwater sampling events proposed in the March 2019 SSI and EFR Plan.



Please submit an addendum to the March 2019 SSI and EFR Plan that satisfactorily addresses the above comments for NYSDEC/NYSDOH review/approval by April 22, 2019.

Please contact me at 518-357-2394 if there are any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read 'C. O'Neill', with a long horizontal line extending to the right.

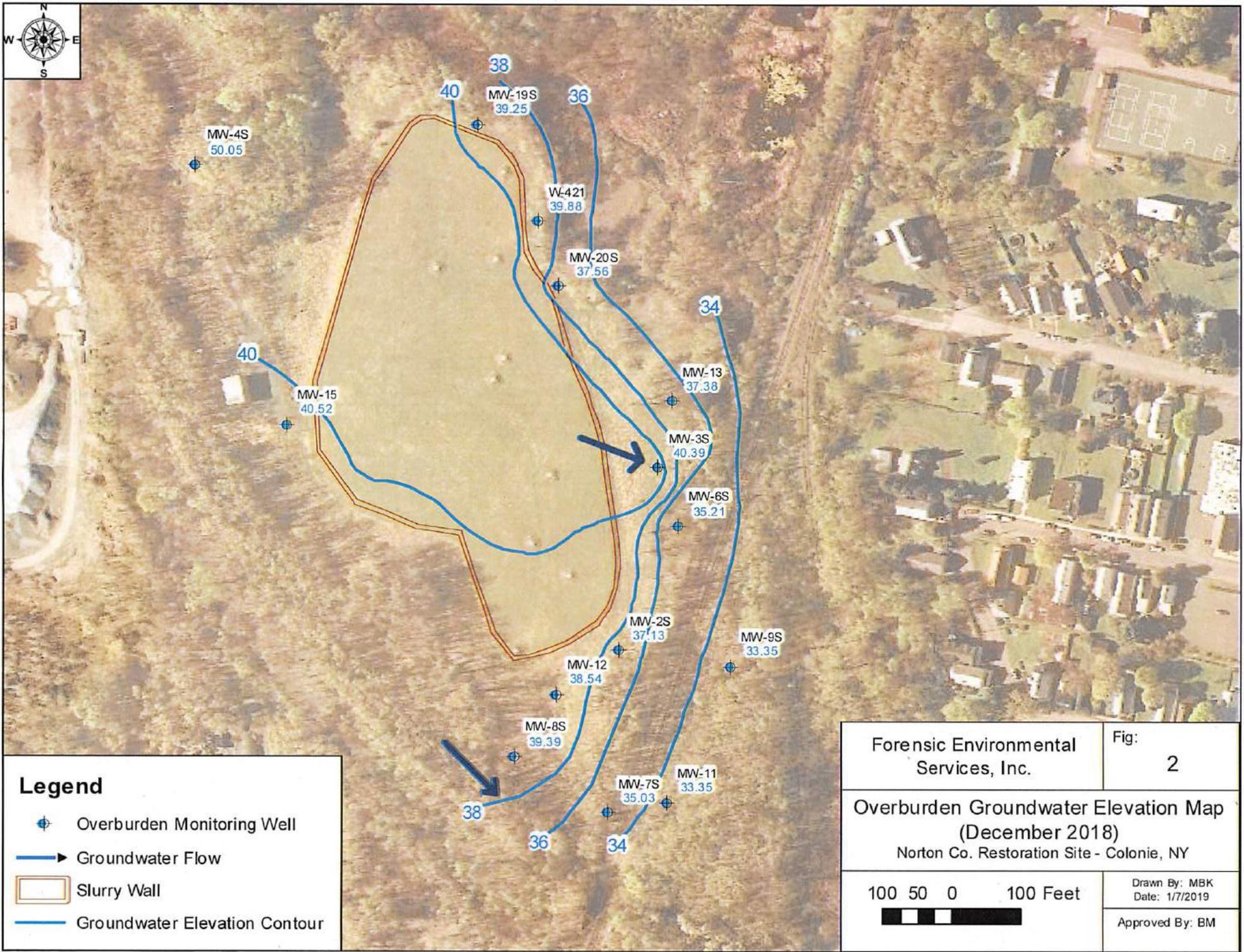
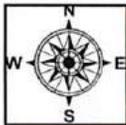
Christopher O'Neill, P.E.  
Professional Engineer 1

#### Attachments

ecc: J. Smith, St. Gobain  
T. Maguire, FES  
S. Bogardus, NYSDOH  
S. McLaughlin, NYSDOH  
J. Deming, NYSDOH  
D. Tinsley, Esq., NYSDEC  
R. Mustico, NYSDEC

2019-04-09.Comment Letter on March 2019 SSI and EFR Plan





**Legend**

- Overburden Monitoring Well
- Groundwater Flow
- Slurry Wall
- Groundwater Elevation Contour

Forensic Environmental Services, Inc.	Fig: 2
Overburden Groundwater Elevation Map (December 2018) Norton Co. Restoration Site - Colonie, NY	
100 50 0 100 Feet	Drawn By: MBK Date: 1/7/2019
	Approved By: BM