

Statement of Basis

Amphenol Corporation Facility
40-60 Delaware Avenue
Village of Sidney, Delaware County
EPA ID No. NYD001827633
Site No.'s 413010 & 413013

September 2019



Prepared by:
Division of Environmental Remediation
New York State Department of Environmental Conservation

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DECLARATION STATEMENT
Statement of Basis
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Statement of Purpose and Basis

This document presents the selected remedy for the Amphenol Facility, which contains two sites listed on the New York State Registry of Inactive Hazardous Waste Disposal Sites. The remedial program was chosen in accordance with the New York State Environmental Conservation Law and Title 6 of the Official Compilation of Codes, Rules and Regulations of the State of New York (6 NYCRR) Part 373 (RCRA) and Part 375-2 (Superfund).

The remedy was made available for public comment from August 21 through September 20, 2019. No written comments were received from the public on the remedy presented in the Draft Statement of Basis. A public meeting was held on September 4, 2019. A Responsiveness Summary was prepared based on general questions asked during the meeting and is included in this Statement of Basis. The remedy was selected based on the New York State Department of Environmental Conservation's (Department's) Administrative Record for the Amphenol Facility, which is also included in this Statement of Basis, and the public's input on the remedy as presented by the Department.

Description of Selected Remedy

Based on the corrective actions already implemented by the responsible party, Amphenol Corporation, under the RCRA and the State Superfund Program, the selected remedy is No Further Action. The selected remedy will reduce or eliminate exposure to contaminants of concern using institutional controls and engineering controls (IC/ECs) as summarized below.

An institutional control in the form of an environmental easement will be put in place on this site in order to:

- Restrict groundwater use at the site;
- Restrict the site to industrial use only; and
- Require the implementation of the Site Management Plan with environmental monitoring, and periodic certification that the IC/ECs are effective.

The following engineering controls will continue to be implemented and maintained:

- The West Well and Parking Area groundwater extraction and treatment system, which prevents further off-site migration of contaminated groundwater;

- The Boiler Room Area groundwater extraction and treatment system, which prevents further off-site migration of shallow contaminated groundwater;
- The existing cover system, which includes the concrete slab from the former main plant structure and surrounding paved areas (*e.g.*, parking area); and
- Existing sub-slab depressurization systems in off-site buildings impacted by the site.

New York State Department of Health Acceptance

The New York State Department of Health (NYSDOH) concurs that the remedy selected for the facility is protective of human health.

Declaration

The selected remedy is protective of human health and the environment, complies with State and federal requirements that are legally applicable or relevant and appropriate to the remedial action to the extent practicable, and is cost effective. This remedy utilizes permanent solutions and alternative treatment or resource recovery technologies, to the maximum extent practicable, and satisfies the preference for remedies that reduce toxicity, mobility, or volume as a principal element.



Michael J. Ryan, P.E., Director
Division of Environmental Remediation

September 27, 2019
Date

STATEMENT OF BASIS
Amphenol Corporation Facility
40-60 Delaware Avenue
Village of Sidney, Delaware County
EPA ID No. NYD001827633
Site No.'s 413010 & 413013

INTRODUCTION

The New York State Department of Environmental Conservation (Department), in consultation with the New York State Department of Health (NYSDOH), has selected a remedy for the above referenced site. The disposal or release of hazardous wastes at this site, as more fully described in this document, has contaminated various environmental media. The remedy is intended to attain the remedial action objectives identified for the protection of public health and the environment. This document describes the remedy selection process and provides a summary of the information that can be found in the site-related reports and documents.

The New York State Inactive Hazardous Waste Disposal Site Remedial Program (also known as the State Superfund Program) is an enforcement program, the mission of which is to identify and characterize suspected inactive hazardous waste disposal sites and to investigate and remediate those sites found to pose a significant threat to public health and environment. The New York State Hazardous Waste Management Program (also known as the Resource Conservation and Recovery Act, or RCRA) requires corrective action for releases of hazardous waste and hazardous constituents to the environment. This facility is subject to both programs, and this remedy is consistent with the remedial requirements of both programs.

The purpose of this Statement of Basis is to provide background information related to the site contamination and investigation, including solid waste management units (SWMUs), to present the remedy selected by the Department to address remaining environmental contamination at the Amphenol Corporation facility (Amphenol Facility), and to present the basis for its selection. This document provides the opportunity for the public to be informed of and to participate in the development of the remedial program for the facility. Public input on all potential remedial alternatives, and on the information that supports the alternatives, is an important contribution to the corrective measure selection process.

FACILITY BACKGROUND

LOCATION: The Amphenol Facility is located at 40-60 Delaware Avenue, Village of Sidney, Delaware County. The site is located a half mile south of the Susquehanna River and is in the Susquehanna River valley flood plain. The Amphenol Facility contains two sites listed on the New York State Registry of Inactive Hazardous Waste Disposal Sites, which are referred to as the West Well and Parking Area (Site No. 413010) and the Boiler Room Area (Site No. 413013). The area surrounding the Amphenol Facility consists of railroad tracks, some light commercial property and residential property (*Figure 1*).

SITE FEATURES: The 42-acre site includes the former approximately 683,000 square foot Production Building, the West Well (production well), the Plating Facility, and the associated wastewater treatment plant (*Figure 2*). The Production Building was abandoned in 2014 as Amphenol Corporation moved most of its manufacturing operations to a location approximately one mile west. The Production Building, except for the room housing the groundwater treatment system for the Boiler Room Area, was demolished to the slab in October 2018. The remainder of the property is mostly paved with asphalt (*i.e.*, driveways and parking areas).

CURRENT ZONING AND LAND USE: The property containing the Amphenol Facility is locally zoned as I-1, which is defined as “commercial, industrial, non-residential”. The subject property is used for industry, while the surrounding area includes commercial and residential use properties.

PAST USE OF THE SITE: Manufacturing of various electrical components at the site dates to the 1930s. Various solvents were used in the manufacturing process at this facility. Hazardous wastes were generated through electroplating, vapor degreasing and parts-cleaning operations. An on-site plating operation has been active since 1970 and is located at the west end of the site. Two underground storage tanks were used for boiler fuel between approximately 1960 and 1981. One of the tanks was then used to store waste oils until it was removed in 1984.

In June 1989, Versar Inc. (Versar), under contract to the United States Environmental Protection Agency (EPA), completed an inspection of the Amphenol Facility, in order to proceed through the RCRA Corrective Action process, prior to EPA releasing the facility from its Interim Status. The Final Inspection Report (Versar 1990) for Corrective Action Prior to Loss of Interim Status (CAPT LOIS) identified seven SWMUs, which are described below under the Facility Solid Waste Management Units and Corrective Actions section. Upon further investigation of the SWMUs, two areas within the Amphenol Facility were referred to the Registry of Inactive Hazardous Waste Disposal sites (*i.e.*, State Superfund Program).

SITE GEOLOGY AND HYDROLOGY: The geology and hydrology at the Amphenol Facility consists of highly permeable sediments of glacial and alluvial origin to a depth of approximately 20 feet below ground surface. Groundwater occurs approximately 15 feet below ground surface and flows to the northeast with a very shallow hydraulic gradient toward the Susquehanna River. At depths greater than 20 feet below ground surface the geology transitions to glaciolacustrine silts and clays underlain by dense basal till. Red shale bedrock was encountered on-site at depths of 100 feet or more below ground surface.

ENFORCEMENT STATUS

Potentially Responsible Parties (PRPs) are those who may be legally liable for contamination at a site. This may include past or present owners and operators, waste generators and haulers. The PRP for this site, documented to date, is Amphenol Corporation.

In November 1989, Amphenol Corporation entered two Consent Orders (COs) requiring corrective action at the Boiler Room Area (Index No. 04-0539-88-02) and the West Well and Parking Area

(Index No. 04-0312-85-06) through the State Superfund Program. The latter CO was modified in 2009 to address additional environmental concerns related to the Amphenol Facility.

ENVIRONMENTAL ASSESSMENT

NATURE AND EXTENT OF CONTAMINATION

A contaminant of concern is a hazardous waste that is sufficiently present in frequency and concentration in environmental media (*i.e.*, soil, groundwater and/or soil vapor) to require evaluation for remedial action. Based on environmental investigations and monitoring conducted at the Amphenol Facility since the mid-1980s, the primary contaminants of concern and environmental media affected are volatile organic compounds (VOCs) and metals in groundwater, VOCs in soil vapor and indoor air, and polychlorinated biphenyls (PCBs) in soil. The various contaminants of concern are attributed to the industrial use of the Amphenol Facility (*e.g.*, use of solvents containing VOCs for degreasing, use of dissolved metals in the electroplating process, and use of cutting oils which historically contained PCBs).

Groundwater – The VOCs benzene, 1,1,1-trichloroethane (TCA), tetrachloroethene (PCE), trichloroethene (TCE) and its breakdown products *cis*- and *trans*-1,2 dichloroethene (*cis*-DCE) and vinyl chloride, and the metals cadmium, chromium, copper, cyanide and nickel, historically exceed the groundwater standard on and/or off-site, as summarized in Table 1 and Table 2. The off-site plume extends toward the Susquehanna River and the existing Village of Sidney municipal water supply well approximately 1,500 feet to the north. Low concentrations of TCE and *cis*-DCE have been detected in the Village of Sidney’s municipal supply wells. The concentrations do not exceed applicable drinking water standards and the wells are tested monthly to ensure the drinking water remains acceptable. The routine groundwater monitoring program includes monitoring wells approximately 1,000 feet downgradient of the Amphenol Facility to monitor plume stability. In addition to VOCs and metals, recent sampling identified the presence of the per- and polyfluorinated alkyl substances (PFAS) perfluorooctanoic acid (PFOA) and perfluorooctanesulfonic acid (PFOS) in groundwater above screening values.

Soil – Prior to remediation, PCBs were detected in on-site subsurface soil at concentrations up to 43,300 parts per million (ppm), exceeding the industrial use SCO of 25 ppm (Table 3). As described below, an interim corrective measure was recently completed to remove PCB-contaminated soil exceeding the industrial use SCO.

Soil Vapor – A total of 85 off-site structures were sampled during the soil vapor intrusion evaluation. TCE, the primary contaminant of concern in off-site soil vapor, was detected at concentrations up to 76 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$) in sub-slab soil vapor and $2.3 \mu\text{g}/\text{m}^3$ in indoor air. Based on the soil vapor sampling results, sub-slab depressurization systems (systems that ventilate/remove the air beneath a building) were installed at 18 off-site structures. In addition, soil vapor monitoring was performed at nine structures until 2014, when the program was discontinued based on the results of several years of monitoring data. Amphenol Corporation continues to maintain existing sub-slab depressurization systems.

FACILITY SOLID WASTE MANAGEMENT UNITS AND CORRECTIVE ACTIONS

The Final Inspection Report (Versar 1990) identified seven SWMUs at the Amphenol Facility. (A surface impoundment used by the facility on a non-contiguous property is considered a separate facility, EPA facility identification No. NY0981133184, which is not included in this investigation. This surface impoundment was properly closed under Department oversight and no further remedial action or monitoring is required.). The seven SWMUs identified, and the corrective actions taken (if required), are described in the following paragraphs.

1. Incineration

From about 1969 to 1982, waste oils and solvents were disposed of in an incinerator located in the northwestern part of the Amphenol Facility. The incinerator was certified closed in 1984 pursuant to an EPA-approved closure plan. No spills were reported in the vicinity of the incinerator, nor was there evidence of a release. Nevertheless, groundwater contamination was discovered in the vicinity of the former incinerator. The cause of the contamination is believed to have been a result of Amphenol Corporation coating an unpaved parking lot with spent plating oil to control dust. (See West Parking Lot, below.)

2. West Parking Lot

Spent plating oils were historically applied to an unpaved portion of the West Parking Lot for dust control. Soil sampling conducted in 1984 revealed PCBs above the industrial use soil cleanup objective (SCO) of 25 ppm in two of the eight sampling locations in the West Parking Lot area. As a result, the parking lot was paved in August 1984. However, subsequent environmental studies performed at the West Well and West Parking Lot area through the mid-1980s detected VOCs at concentrations exceeding groundwater standards (see Hydrogeologic and Soils Investigations at the West Well and West Parking Lot, April 1986). A proposal to install a groundwater extraction and treatment remedial system to address VOC contaminated groundwater at the West Well and control off-site migration was presented in a report titled Alternatives for Remediation – West Well and West Parking Lot Area (May 1987). The Department approved the installation of an air stripper to treat the West Well effluent, and operation of the groundwater extraction began on March 14, 1988. The extracted groundwater from the West Well is used by the Plating Facility for manufacturing process water prior to being treated at the Plating Facility's wastewater treatment plant and discharged to a storm water outfall regulated under the State Pollutant Discharge Elimination System (SPDES). The remedial program was ultimately implemented under the State Superfund Program. Amphenol Corporation is obligated under CO No. 04-01312-85-06 to operate, maintain and monitor this remedial system.

Investigations related to the Plating Facility in the late 1980s revealed heavy metal contamination beneath the foundation (see Plating Facility Hydrogeologic Assessment, March 1989). As a result, Amphenol Corporation implemented a Supplemental Remedial Program (SRP), pursuant to the existing consent order, to address the heavy metal contamination under the State Superfund Program. The SRP involved extracting groundwater from two monitoring wells within the Plating Facility and treating the effluent at the facility's wastewater treatment plant. The Plating Facility

extraction system was activated in August 1989 and deactivated in July 2014. Residual metals contamination from the Plating Facility continues to be controlled by the West Well groundwater extraction system.

In 2009, the West Parking Lot CO was modified, directing Amphenol Corporation to mitigate the migration of PCBs *via* the Village of Sidney's sanitary sewer line underneath the facility. Accordingly, Amphenol Corporation implemented another SRP to investigate and mitigate the affected sanitary sewers beneath the Amphenol Facility and the discharge of PCBs from the village wastewater treatment plant (JTM 2012).

Corrective action required for the West Parking Lot SWMU has been addressed under the State Superfund Program.

3. Storage Tanks (Active)

At the time of the CAPT LOIS inspection, two 10,000-gallon aboveground storage tanks and one 6,000-gallon aboveground storage tank were used for storing hazardous wastes generated from facility operations. These tanks were pressure tested, as required for closure, and determined to be leak free. No spills were reported to have occurred from these three tanks, nor was there evidence of a release. These tanks were since removed based upon site inspection.

4. Storage Tanks (Inactive and Removed)

At the time of the 1989 CAPT LOIS inspection, one 15,000-gallon underground storage tank (UST), installed in 1981, had been removed, and one 2,000-gallon aboveground tank and one 3,000-gallon aboveground tank had been decommissioned. The 2,000-gallon tank, which was associated with the incinerator, was decommissioned in 1982, cleaned, cut, and sold as scrap metal. The 3,000-gallon tank was decommissioned and cleaned in 1984 but was kept for backup storage. No spills were reported to have occurred from the 2,000-gallon and 3,000-gallon aboveground tanks, nor was there evidence of any release. A release from the 15,000-gallon UST was documented when the tank was removed in 1984. As a result, 11 monitoring wells were installed to assess potential groundwater contamination. This investigation ultimately determined that petroleum contamination was not significant; however, significant VOC contamination in groundwater was detected. Corrective action was warranted and accordingly a remedial program under the State Superfund Program was implemented. The Superfund site is referred to as the Boiler Room Area (Amphenol).

Between January 1985 and February 1995 several investigations were completed for the purposes of defining the nature and extent of groundwater impacts and to identify appropriate remedial measures to control further off-site migration of contaminated groundwater (see Boiler Room Remedial Investigation Report, March 1996). Between 1996 and 1999, a groundwater recovery well and treatment system was constructed as an interim remedial measure (see Boiler Room Focused Feasibility Study, January 1999). The treatment system consists of three recovery wells to capture contaminated groundwater and control off-site migration. The collected groundwater is treated *via* a shallow tray air stripper and the effluent is discharged to a SPDES-regulated storm

water outfall. The March 1999 Record of Decision for the Boiler Room Area (Amphenol) site prescribes the continued operation of the shallow groundwater extraction and treatment system with periodic monitoring, sampling, and inspection to ensure the continued effectiveness of the ongoing remedial action. Amphenol Corporation is obligated under CO No. 04-0539-88-02 to operate, maintain and monitor this remedial system.

In addition to the above, a soil vapor intrusion evaluation was performed between 2005 and 2011 as part of the Boiler Room Area (Amphenol) remedial program. Based on the soil vapor sampling results, sub-slab depressurization systems were installed at 18 off-site structures. In addition, soil vapor monitoring was performed at nine structures. After several years of monitoring data, in 2014, it was determined by the State that the program could be discontinued. Amphenol Corporation continues to maintain existing sub-slab depressurization systems.

Corrective action for this SWMU has been addressed under the State Superfund Program.

5. Wastewater Treatment Plant

The wastewater treatment plant treats wastewater from plating operations and is regulated under SPDES (Permit No. NY0003824). This unit is exempt from RCRA regulation. Furthermore, according to the CAPT LOIS inspection, no spills or releases were reported to have occurred as a result of the wastewater treatment operations.

6. Container Storage Area

The hazardous waste container storage building was situated in the western part of the site. Each storage area was equipped with a containment system and sump. Drums (55-gallon) of waste were stored temporarily in the container storage building pending transportation for offsite disposal. Although no spills or releases were reported to have occurred at the container storage building, soil sampling was performed by JTM Associates, LLC (JTM), on behalf of Amphenol Corporation, to determine whether any releases occurred (JTM 2012). Based on the results of the sampling no further action was required.

7. Former Container Storage Area

The former hazardous waste container storage area was situated along the chain link fence west of the waste water treatment plant. No spills or releases were reported to have occurred at the old drum storage area. At the time of the CAPT LOIS inspection, vegetation adjacent to the area did not appear stressed. Shallow soil samples were collected from below the existing pavement in the former container storage area in 2019 (JTM 2019). Based on the results of the sampling no further action was required.

Areas of Concern

No areas of concern were identified at facility in the Final Inspection Report (Versar 1990).

Summary of Facility Corrective Action Inspection

Seven SWMUs identified during the file review process were identified during the Final Inspection. Of these SWMUs, the West Parking Lot area and the former 15,000-gallon UST area were discovered to have released contaminants to the environment. As corrective action, both areas were placed on the New York State Registry of Inactive Hazardous Waste Disposal Sites (State Superfund Program) as Class 2 sites. The West Parking Lot area was designated as Site No. 413010, West Well and Parking Area (Amphenol); the former 15,000-gallon UST area was designated as Site No. 413013, Boiler Room Area (Amphenol). Ongoing remedial programs have been implemented at both State Superfund sites within the Amphenol Facility.

INTERIM CORRECTIVE MEASURES

PCB CONTAMINATED SLAB REMOVAL

Amphenol Corporation demolished the former Production Building in 2018 pursuant to a Department-approved demolition work plan. During the demolition, areas of staining on the concrete slab were observed. The Department requested that concrete samples be collected from the affected areas and analyzed for PCBs. Amphenol Corporation identified five areas of the slab (B-1 through B-5) where staining coincided with locations where PCB cutting oils were historically used for production or where oil recycling occurred. Subsequent sampling identified two of these areas (B-1 and B-5) where the slab exhibited elevated levels of PCBs. Based on the results, the PCB-contaminated slab in these areas was excavated and properly disposed of according to a Department-approved work plan. Prior to restoring the slab, samples collected from the underlying soil were analyzed for PCBs. Based on the B-1 area sampling results, this area was restored with cast-in-place concrete. Based on the B-5 area results, which exhibited elevated levels of PCBs in the sub-slab soil, additional excavation was required. From May through July 2019, approximately 800 yards of PCB-contaminated sub-slab soil from the B-5 area and approximately 390 yards of PCB-contaminated concrete from the B-1 and B-5 areas were excavated and disposed of at properly permitted facilities. Confirmatory samples were collected to demonstrate general compliance with the industrial use SCO for PCBs (25 ppm). The B-5 area was subsequently backfilled and the concrete slab restored. A Construction Completion Report detailing the interim corrective measure is currently being prepared by Amphenol Corporation for the Department's review and approval.

EXPOSURE ASSESSMENT

Public water supply wells, located approximately 1,500 feet away from the site, are tested regularly and are shown to meet applicable standards. People will not come into contact with the contaminated soil unless they perform ground-intrusive work at the site. Volatile organic compounds in the soil vapor (air spaces within soil) may move into overlying buildings, affecting the indoor air quality of those structures. This process, which is similar to the movement of radon gas from the subsurface into the indoor air of buildings, is referred to as soil vapor intrusion. Soil vapor intrusion sampling identified the need to take action to address the potential for exposure. Sub-slab depressurization systems (systems that ventilate/remove the air beneath a building) have

been installed in off-site buildings to prevent the indoor air quality from being affected by the contamination in soil vapor beneath the buildings. The potential for soil vapor intrusion needs to be evaluated for any future building developed on the site.

REMEDIATION OBJECTIVES

The remediation objectives and actions to attain them are summarized in the following table:

Remediation Objective	Remedial Action
Groundwater	
<p><u>Public Health</u></p> <ul style="list-style-type: none"> • Prevent ingestion of groundwater with contaminant levels exceeding drinking water standards. • Prevent direct contact with, or inhalation of volatiles, from contaminated groundwater. <p><u>Environment</u></p> <ul style="list-style-type: none"> • Restore ground water aquifer to pre-disposal/pre-release conditions, to the extent practicable. • Prevent the discharge of contaminants to surface water and sediment. • Remove the source of ground or surface water contamination. 	<ul style="list-style-type: none"> • Continued operation of existing Engineering Controls (groundwater extraction and treatment systems). • Imposition of Institutional Controls. • Site Management Plan (specifically the Excavation Work Plan, Site Monitoring Plan and Operation and Maintenance Plan).
Soil	
<p><u>Public Health</u></p> <ul style="list-style-type: none"> • Prevent the ingestion and/or direct contact with contaminated soil. • Prevent the inhalation of, or exposure from contaminants, volatilizing from contaminants in soil. <p><u>Environment</u></p> <ul style="list-style-type: none"> • Prevent migration of contaminants that would result in groundwater or surface water contamination. • Prevent impacts to biota from ingestion/direct contact with soil causing toxicity or impacts from bioaccumulation through the terrestrial food chain. 	<ul style="list-style-type: none"> • Continued operation of existing Engineering Controls (cover system). • Institutional Controls to restrict land use. • Site Management Plan, including Excavation Work Plan (specifically the Site Monitoring Plan and Operation and Maintenance Plan).
Soil Vapor	
<p><u>Public Health</u></p> <ul style="list-style-type: none"> • Mitigate impacts to public health resulting from existing, or the potential for, soil vapor intrusion into buildings at a facility. 	<ul style="list-style-type: none"> • Continued operation of existing Engineering Controls (<i>e.g.</i>, off-site sub-slab depressurization systems). • Imposition of Institutional Controls to restrict land use. • Site Management Plan (specifically the Site Monitoring Plan and Operation and Maintenance Plan).

SELECTED REMEDY

Based on the results of the investigations at the Amphenol Facility, and corrective actions taken to date (*e.g.*, the ongoing remedial programs under the State Superfund Program), the Department has selected No Further Action as the remedy for the site. In addition to the continued operation of the previously described remedial systems (engineering controls) under the State Superfund Program, this No Further Action remedy includes implementing institutional controls and a Site Management Plan for the entire facility property. The State Superfund site boundaries (*i.e.*, Boiler Room Area and West Well and Parking Area) will be consolidated and redefined to coincide with the RCRA facility boundary (*i.e.*, the 42-acre Amphenol Facility property). When the remedy is successfully implemented, the Department intends to reclassify the consolidated State Superfund site to a Class 4 (a site that has been properly closed but requires continued management). The Department believes that this remedy is protective of human health and the environment and satisfies the remediation objectives described above. The elements of the selected remedy are summarized below.

1. Continued Operation of Existing Engineering Controls

a. West Well and Parking Area Remedial System

Groundwater extraction and treatment will continue to be implemented to treat VOC contaminants in groundwater and prevent contaminated groundwater from migrating off-site. The groundwater extraction system was designed and installed so that the capture zone is sufficient to intercept the groundwater contaminant plume to stop further migration. Air stripping will continue to be implemented ex-situ to remove volatile contaminants from extracted groundwater. The treated groundwater will be discharged through a SPDES-regulated outfall. Periodic monitoring and inspections will be required.

b. Boiler Room Area Remedial System

Groundwater extraction and treatment will continue to be implemented to treat VOC contaminants in shallow groundwater and mitigate off-site migration of contaminated groundwater. The treated groundwater will be discharged through a SPDES-regulated outfall. Periodic monitoring and inspection will be required.

c. Cover System

A site cover consisting of buildings, pavement, and sidewalks currently exists and will be maintained to allow for industrial use of the site. Any site redevelopment will maintain the existing site cover. The site cover may include paved surface parking areas, sidewalks or soil where the upper one foot of exposed surface soil meets the applicable SCOs for industrial use. Any fill material brought to the site will meet the requirements for the identified site use as set forth in 6NYCRR part 375-6.7(d).

d. Vapor Mitigation

Existing sub-slab depressurization systems, including those in off-site buildings impacted by the site, will continue to be maintained as necessary.

2. Institutional Controls

An institutional control in the form of an environmental easement will be imposed on the property containing the Amphenol Facility that:

- a. requires the remedial party or site owner to complete and submit to the Department a periodic certification of institutional and engineering controls in accordance with Part 375-1.8 (h)(3);
- b. allows the use and development of the controlled property for industrial uses as defined by Part 375-1.8(g), although land use is subject to local zoning laws;
- c. restricts the use of groundwater as a source of potable or process water, without necessary water quality treatment as determined by the NYSDOH or County DOH;
- d. requires compliance with the Department approved Site Management Plan.

3. Site Management Plan

A Site Management Plan is required, which includes the following:

- a. an Institutional and Engineering Control Plan that identifies all use restrictions and engineering controls for the site and details the steps and media-specific requirements necessary to ensure the institutional and/or engineering controls, listed above in Paragraphs 1 and 2 of this section, remain in place and effective. This plan includes, but may not be limited to:
 - i. an Excavation Plan which details the provisions for management of future excavations in areas of remaining groundwater contamination;
 - ii. descriptions of the provisions of the environmental easement including any land use, and groundwater use restrictions;
 - iii. a provision for evaluation of the potential for soil vapor intrusion should there be a change in use of on-site buildings (*i.e.*, Plating Facility) and for any buildings developed on the site, including provisions for implementing actions recommended to address exposures related to soil vapor intrusion;
 - iv. provisions for the management and inspection of the identified engineering controls;
 - v. maintaining site access controls and Department notification; and
 - vi. the steps necessary for the periodic reviews and certification of the institutional and/or engineering controls.
- b. a Monitoring Plan to assess the performance and effectiveness of the remedy. The plan includes, but may not be limited to:
 - i. monitoring of groundwater (including off-site groundwater) to assess the performance and effectiveness of the remedy and ensure protection of the public supply wells;
 - ii. a schedule of monitoring and frequency of submittals to the Department; and

- iii. monitoring for vapor intrusion for any buildings re-occupied or developed on the site, as may be required by the Institutional and Engineering Control Plan discussed above.
- c. an Operation and Maintenance (O&M) Plan to ensure continued operation, maintenance, optimization, monitoring, inspection, and reporting of any mechanical or physical components of the remedy. The plan includes, but is not limited to:
 - i. procedures for operating and maintaining the remedy;
 - ii. compliance monitoring of treatment systems to ensure proper O&M as well as providing the data for any necessary permit or permit equivalent reporting;
 - iii. maintaining site access controls and Department notification; and
 - iv. providing the Department access to the site and O&M records.

PUBLIC PARTICIPATION

Document Availability

The Draft Statement of Basis and the referenced reports were made available to the public during the public comment period at the following repository:

Sidney Memorial Public Library
8 River Street
Sidney, New York 13838
607-563-8021

Files related to the remediation of this site can also be viewed at the NYSDEC Region 4 Office, 1130 North Westcott Road, Schenectady, NY 12306. If interested in seeing files at the NYSDEC Region 4 location, please contact the individual listed below for an appointment.

Public Meeting

A public meeting was held on Wednesday, September 4, 2019 at 7:00 PM at the following location:

Sidney Civic Center
Board Room
21 Liberty Street
Sidney, NY 13838

Public Comment Period

The Department accepted comments on the Draft Statement of Basis from August 21, 2019 to September 20, 2019. Questions or comments regarding the Draft Statement of Basis were directed to:

Joshua G. Haugh, P.G.
NYS Department of Environmental Conservation
Division of Environmental Remediation
1130 North Westcott Road
Schenectady, NY 12306
joshua.haugh@dec.ny.gov

There were no written comments received by the Department during the public comment period. A Responsiveness Summary was prepared based on the general questions received during the public meeting. The Responsiveness Summary is included in Appendix A of this Statement of Basis.

TABLES

Table 1 - Groundwater Samples Associated with West Well and Parking Area (Amphenol) and Boiler Room Area (Amphenol) Investigations

Detected Constituents	Concentration Range Detected (ppb) ^a	SCG ^b (ppb)	Frequency Exceeding SCG
Metals and Cyanide			
Arsenic	<5 to 90	25	1 of 26
Cadmium	<5 to 21,000	5	12 of 26
Chromium	<50 to 15,000	50	5 of 26
Copper	<10 to 12,000	200	6 of 26
Cyanide	<10 to 2,700	200	4 of 26
Lead	<50 to 1,300	25	1 of 26
Mercury	<0.5 to 2.5	0.7	1 of 26
Nickel	<50 to 28,000	100	10 of 26
Zinc	<10 to 9,800	2,000	6 of 26
VOCs			
Benzene	<1 to 210	1	39 of 149
Chloroform	<0.5 to 11	7	1 of 149
1,1 Dichloroethane	<5 to 32	5	29 of 149
1,2 Dichloroethane	<0.6 to 11	0.6	3 of 149
1,1 Dichloroethene	<5 to 20	5	1 of 149
*cis 1,2 Dichloroethene	<5 to 3,000	5	85 of 149
*trans 1,2 Dichloroethene	<5 to 3,000	5	85 of 149
Ethylbenzene	<5 to 56	5	3 of 149
Tetrachloroethene	<5 to 250	5	35 of 149
Toluene	<5 to 510	5	9 of 149
1,1,1 Trichloroethane	<5 to 130	5	6 of 149
Trichloroethylene	<5 to 1,500	5	83 of 149
Vinyl Chloride	<2 to 170	2	45 of 149
Xylenes (Total)	<5 to 60	5	8 of 149
PCBs			
Total PCBs	<0.09 to 4	0.09	1 of 45
PFASs			
PFOA	<0.0042 to 0.12	0.070	3 of 13
PFOS	<0.0042 to 1.05	0.070	8 of 13
PFOA + PFOS	<0.0084 to 1.17	0.070	10 of 13

a - ppb: parts per billion, which is equivalent to micrograms per liter, ug/L, in water.

b - SCG: Standard Criteria or Guidance - Ambient Water Quality Standards and Guidance Values (TOGs 1.1.1), 6 NYCRR Part 703, Surface water and Groundwater Quality Standards (class GA), and EPA's 2016 Drinking Water Health Advisories for PFOA and PFOS.

*- cis and trans 1,2 Dichloroethene considered the same, single contaminant for the purposes of this summary table.

NOTE: Data included on this table represents samples that were collected from permanently installed monitoring wells during investigations.

Table 2 - Groundwater Samples Associated with West Well and Parking Area (Amphenol) and Boiler Room Area (Amphenol) Routine Monitoring (1999 through 2018)

Detected Constituents	Concentration Range Detected (ppb) ^a	SCG ^b (ppb)	Frequency Exceeding SCG
Metals and Cyanide			
Cadmium	<5 to 1,840	5	259 of 320
Chromium	<50 to 5,500	50	96 of 320
Cyanide	<10 to 230	200	1 of 320
Nickel	<50 to 7,850	100	125 of 320
Zinc	<10 to 2,790	2,000	3 of 320
VOCs			
Chloroform	<0.5 to 41	7	15 of 667
1,1 Dichloroethane	<5 to 20	5	12 of 667
1,1 Dichloroethene	<5 to 5.3	5	1 of 667
*cis 1,2 Dichloroethene	<5 to 790	5	276 of 667
*trans 1,2 Dichloroethene	<5 to 3,000	5	276 of 667
Tetrachloroethene	<5 to 80	5	152 of 667
1,1,1 Trichloroethane	<5 to 22	5	10 of 667
Trichloroethylene	<5 to 790	5	325 of 667
Vinyl Chloride	<2 to 53	2	57 of 667

a - ppb: parts per billion, which is equivalent to micrograms per liter, ug/L, in water.

b - SCG: Standard Criteria or Guidance - Ambient Water Quality Standards and Guidance Values (TOGs 1.1.1) and 6 NYCRR Part 703, Surface water and Groundwater Quality Standards (class GA).

*- cis and trans 1,2 Dichloroethene considered the same, single contaminant for the purposes of this summary table

Table 3 – Soil

Detected Constituents	Concentration Range Detected (ppm)^a	Unrestricted Use SCG^b	Frequency Exceeding Unrestricted SCG	Restricted Use SCG^c Industrial	Frequency Exceeding Restricted SCG
Soil Samples Associated with West Well and Parking Area (Amphenol) and Boiler Room Area (Amphenol) Investigations					
Benzo(a)pyrene	<0.38 to 1.4	1	1 of 8	1.1	1 of 8
Total PCBs	<0.4 to 85	0.1	7 of 23	25	1 of 23
Soil Samples Associated with Interim Corrective Measures (PCB Contaminated Slab Removal)					
PCBs (Concrete Slab)	<0.22 to 10,000	0.1	56 of 56	25	25 of 55
PCBs (Sub-Slab Soil)	<0.034 to 43,300	0.1	123 of 144	25	49 of 144

a - ppm: parts per million, which is equivalent to milligrams per kilogram, mg/kg, in soil;

b - SCG: Part 375-6.8(a), Unrestricted Soil Cleanup Objectives.

c - SCG: Part 375-6.8(b), Restricted Use Soil Cleanup Objectives for the Protection of Public Health for Industrial Use, unless otherwise noted.

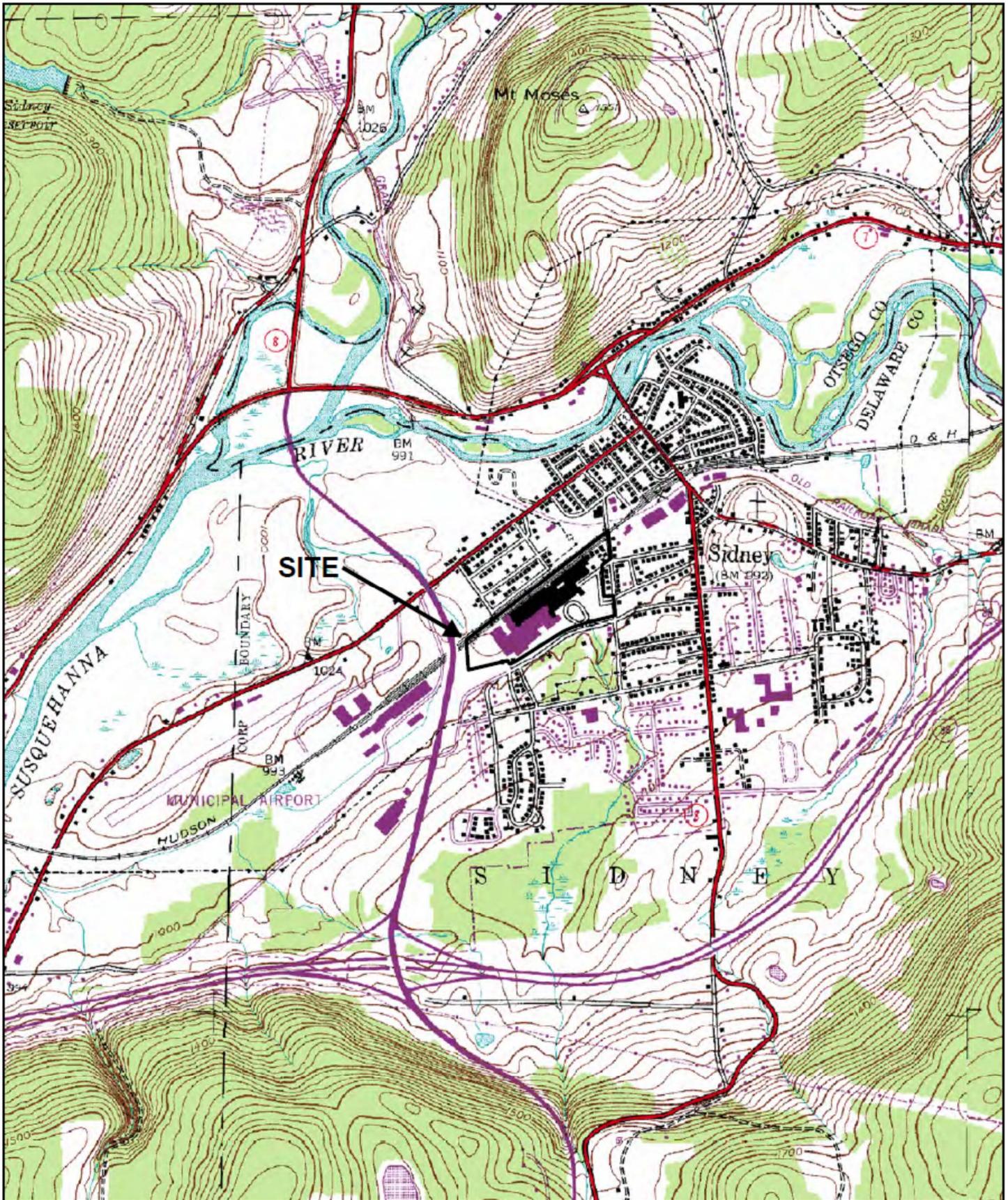


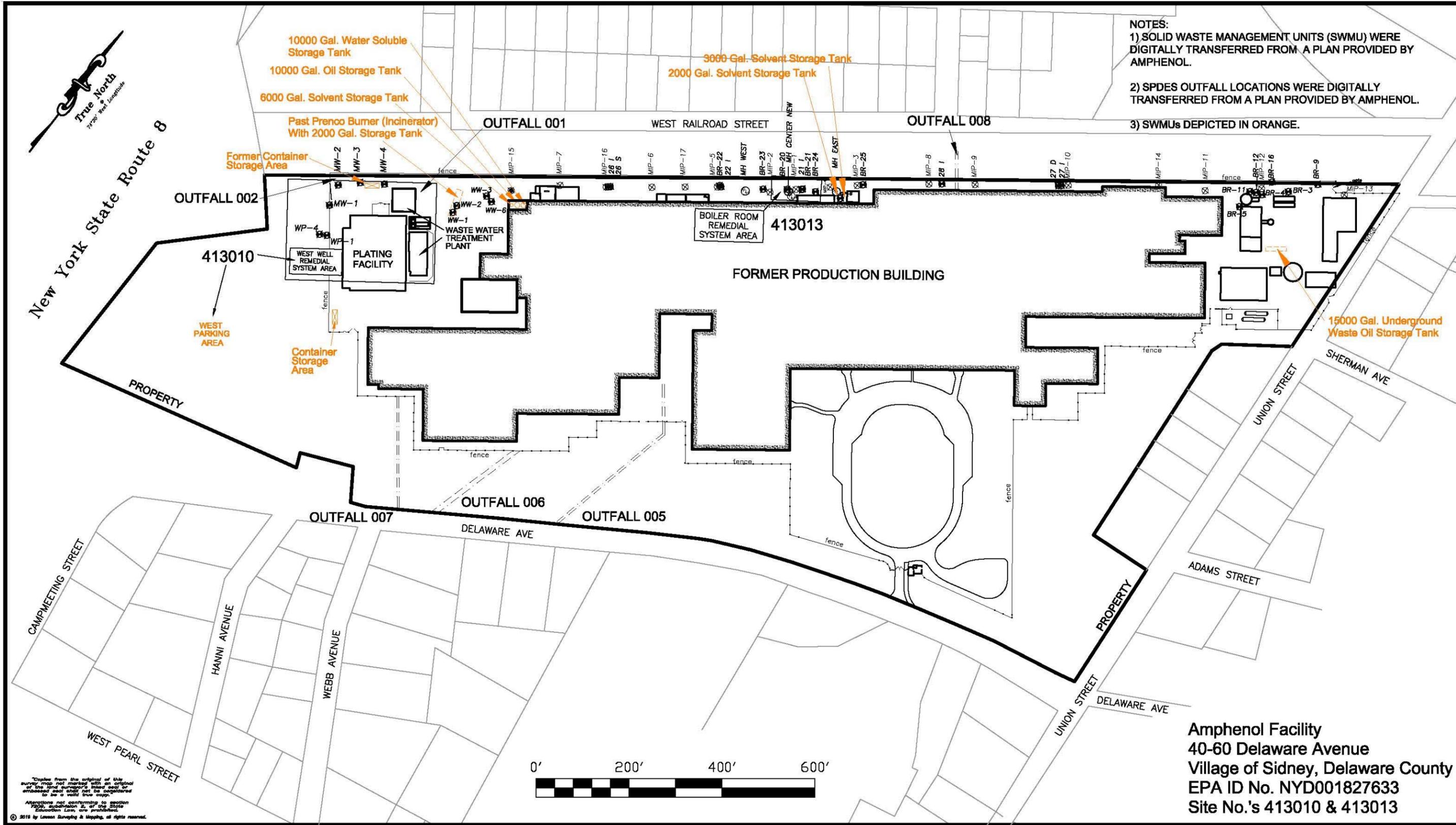
Figure 1 – Site Location Map
Amphenol Facility
Village of Sidney
Delaware County



1:24,000



Department of Environmental Conservation



2 of 2

DATE: February 21, 2019
 V.L.A. No. 6395
 SCALE: 1 inch = 400 feet
 DRAWN BY: S.A.D.
 CHECKED BY: R.L.L.
 DWG FILE: 030510G
 SHEET No.: M-11-109



LAWSON SURVEYING & MAPPING

Boundary ~ Topographic ~ Control ~ Deformation ~ Construction ~ G.I.S. ~ Subdivision ~ G.P.S.
 2969 County Route 5 • Oneonta, New York 13820
 Phone: (807) 432-3300
 Facsimile: (807) 432-8515
 www.lawsonsurvey.com

REVISIONS			
No.	Date	Description	
1	4/9/2019	Revisions per NYS DEC comments	
2	9/9/2019	Additional Revisions per NYS DEC comments	
3	9/18/2019	Additional Revisions per NYS DEC comments	

FIGURE 2

APPENDIX A
Responsiveness Summary
Amphenol Corporation Facility
40-60 Delaware Avenue
Village of Sidney, Delaware County
EPA ID No. NYD001827633
Site No.'s 413010 & 413013

The Draft Statement of Basis for the above referenced site was prepared by the New York State Department of Environmental Conservation (Department), in consultation with the New York State Department of Health (NYSDOH) and was issued to the document repository on August 21, 2019. The Draft Statement of Basis outlined the remedy for the referenced site.

The release of the Draft Statement of Basis was announced by sending a notice to the public contact list, informing the public of the opportunity to comment on the remedy. The public comment period was held from August 21 through September 20, 2019. The Department did not receive any written comments on the remedy during the comment period.

A public meeting was held on September 4, 2019 which included a presentation of the remedial investigations at the site and a discussion of the remedy. The meeting provided an opportunity for citizens to discuss their concerns, ask questions and comment on the proposed remedy. This responsiveness summary responds to the general questions and comments raised during the public meeting.

COMMENT 1: Does trichloroethene-contaminated groundwater cause brain cancer?

RESPONSE 1: There is no evidence that exposure to the primary contaminant of concern, trichloroethene (TCE), causes brain cancer. Some evidence of exposure (the direct physical contact between a person and a chemical) to moderate or high levels of TCE indicates that TCE can cause kidney cancer in people; and there is also some evidence for TCE-induced liver cancer and malignant lymphoma.

COMMENT 2: Were water table fluctuations (*i.e.*, rising or falling groundwater trends) evaluated during the soil vapor intrusion sampling?

RESPONSE 2: Soil vapor intrusion is more likely to occur during the heating season (*i.e.*, November through March) when a building's heating system is in operation and the windows and doors are closed. Groundwater elevations were not routinely measured during the off-site soil vapor intrusion sampling events. However, water level data collected during quarterly groundwater monitoring events indicate the shallow water table typically rises over the course of the heating season (depth to groundwater throughout the study area is generally between 10 and 20 feet below ground surface). It can be reasonably assumed that the noted water table fluctuations/trends were somewhat variable from one sampling event to the next, but the sampling results over several years

of soil vapor monitoring were generally consistent. This would indicate that groundwater elevation fluctuations do not significantly impact soil vapor intrusion at this site.

COMMENT 3: Was soil vapor intrusion sampling conducted at my property and may I see the sampling results?

RESPONSE 3: Sampling results are typically transmitted to the current property owner shortly after the sampling is conducted. If you moved to the study area after the soil vapor intrusion evaluation was completed, please contact the Department or the NYSDOH project manager to find out if soil vapor intrusion sampling was conducted at your property and/or to request previous sampling results.

COMMENT 4: What precautions were taken with regard to dust migration during building demolition and/or concrete or soil excavation work at the site?

RESPONSE 4: A Community Air Monitoring Program (CAMP) was implemented throughout the recent building demolition and the concrete and soil excavation activities conducted at the site. The CAMP involves the use of specialized equipment to monitor particulates (*i.e.*, dust), and, if appropriate, volatile organic compounds (VOCs) in upwind and downwind air. Under the Site Management Plan component of the selected remedy, a CAMP will be required for any future excavation work at the site.

COMMENT 5: How much does the remedy cost?

RESPONSE 5: The estimated present worth cost (*i.e.*, the amount of money invested in the current year that would be sufficient to cover all future costs associated with the remedy) is approximately \$7,000,000. As a convention, a time frame of 30 years is used to evaluate the future costs for remedies with an indefinite duration. This does not imply that operation, maintenance, or monitoring would cease after 30 years if remediation goals are not achieved. The remedy, including the investigations and corrective measures completed to date, is being paid for by the responsible party, Amphenol Corporation.

COMMENT 6: Who is responsible for sending out fact sheets?

RESPONSE 6: Fact sheets are typically prepared and distributed electronically by the Department *via* its contaminated sites by county email listserv. Hardcopy fact sheets are typically mailed to the site contact list (which includes adjoining property owners, local officials, and news media) at the beginning of a remedial investigation or when a significant amount of time has passed since the last fact sheet. Hardcopy fact sheets are typically mailed by the responsible party (Amphenol Corporation) and include information on how to sign up for listserv. Information on how to sign up for the listserv can also be found at <http://www.dec.ny.gov/chemical/61092.html>. Citizens may request to continue to receive hardcopy fact sheets in the mail by contacting the Department project manager. For the announcement of the Draft Statement of Basis, in addition to the adjoining property owners, local officials and news media outlets, over 300 fact sheets were mailed to the neighborhoods surrounding the facility.

COMMENT 7: Are PCBs from the stained areas of the former Production Building slab likely to have migrated off-site?

RESPONSE 7: In 2019, corrective measures were completed to remove portions of the slab exhibiting elevated levels of PCBs. In addition, where encountered, underlying PCB-contaminated soil was removed. Confirmatory samples were collected to demonstrate that the full extent of impacted slab and/or underlying soil was removed from the affected areas. Prior to these corrective measures, PCBs were detected in storm drain and/or sanitary sewer sediments after flooding events in 1996 and 2006. The impacted sediments were subsequently removed and properly disposed of, and the drains and sewers were cleaned, repaired or closed as appropriate.

COMMENT 8: What is the status of the North Well, and does it affect the groundwater extraction systems?

RESPONSE 8: Amphenol Corporation intends to maintain the North Well as back-up process water source for the active Plating Facility. The North Well is currently inactive (not pumping), and therefore, does not affect the groundwater extraction systems.

COMMENT 9: The Village of Sidney is in the process of developing a new water supply well to replace the current supply wells. Is this a result of contamination from the site?

RESPONSE 9: No. The municipal water supply is tested monthly for site-related contaminants and routinely meets applicable drinking water standards. According to the Village of Sidney, the new water supply well is being developed as a result of the manganese levels in, and the flood prone location of, the current supply wells.

COMMENT 10: Was an evaluation of wildlife (including pollinators) completed?

RESPONSE 10: Limited habitat exists at the site and in the immediate surrounding area. Based on the remedial investigations at the site, the contaminants of concern have not significantly impacted the surface water or sediment adjacent to the site. This data was evaluated and it was determined that a fish and wildlife impact assessment was not required.

APPENDIX B
Administrative Record
Amphenol Corporation Facility
40-60 Delaware Avenue
Village of Sidney, Delaware County
EPA ID No. NYD001827633
Site No.'s 413010 & 413013

1. Order on Consent, Index No. 04-0312-85-06, between the Department and Amphenol Corporation, executed November 1, 1989 for Site No. 413010, West Well and Parking Area (Amphenol).
2. Order on Consent, Index No. 04-0312-85-06MI, between the Department and Amphenol Corporation, executed May 6, 2009 for Site No. 413010, West Well and Parking Area (Amphenol).
3. Order on Consent, Index No. R4-0539-88-02, between the Department and Amphenol Corporation, executed November 1, 1989 for Site No. 413013, Boiler Room Area (Amphenol).
4. Final Inspection Report for Corrective Action Prior to Loss of Interim Status (CAPT LOIS) Inspection for the Amphenol Corporation site, dated December 13, 1990, by Versar.
5. Soil Vapor Intrusion Program Summary of Activities October 2006 – February 2009, July 2009, by JTM Associates, LLC.
6. Investigation of Subsurface Oil near the Plant Boiler Room, April 1985, by Environmental Resources Management, Inc.
7. Investigation of Subsurface Oil near the Plant Boiler Room (Addendum), November 1985, by Environmental Resources Management, Inc.
8. Phase II Investigation Amphenol Boiler Room, September 1989, by Environmental Resources Management, Inc.
9. Boiler Room Remedial Investigation (with exhibits), March 1996, by O'Brien & Gere Engineers Inc.
10. Boiler Room Focused Feasibility Study Final Report, January 1999, by O'Brien & Gere Engineers Inc.
11. Hydrogeologic and Soils Investigation at the West Well and West Parking Lot, April 1986, by Environmental Resource Management, Inc.
12. Alternatives for Remediation – West Well and West Parking Lot Area, May 18, 1987, by Environmental Resource Management, Inc.
13. Plating Facility Hydrogeologic Assessment, March 1989, by O'Brien & Gere Engineers Inc.
14. Supplemental Remedial Program letter report, September 10, 1991, by Environmental Resources Management, Inc.
15. Container Storage Area letter report, May 18, 2012, JTM Associates, LLC.

16. PCB Mitigation Program Close-out Summary Report, September 28, 2012, by JTM Associates, LLC
17. Former Container Storage Area letter report, February 26, 2019, JTM Associates, LLC