NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Division of Environmental Remediation, Remedial Bureau C 625 Broadway, 11th Floor, Albany, NY 12233-7014 P: (518) 402-9662 | F: (518) 402-9679 www.dec.ny.gov

March 25, 2015

Via E-mail and Regular Mail

Mr. Fred Schweizer ELG Utica Alloys, Inc. 378 Gross Boulevard Herkimer, NY 13350

Re:

Supplemental Limited On-Site Remedial Investigation Work Plan:

Phase 2, Revision 3

Universal Waste Site - Site No. 633009

City of Utica, Oneida County

Dear Mr. Schweizer:

The New York State Department of Environmental Conservation (Department) reviewed Supplemental Limited On-Site Remedial Investigation Work Plan (LOSRIWP): Phase 2, Revision 3 received on March 19, 2015 from EHS Support, Inc.. The Supplemental LOSRIWP: Phase 2, Revision 3 is hereby approved with the following modification:

The Finish Date for Preparing and Submitting Final LOSRI Report (Task 63) mentioned in the Project Schedule (Figure 7) is modified to "10/2/2015".

In accordance with the Order on Consent, and 6NYCRR 375-1.6(d), please indicate within 15 days whether you accept the Department's modified Supplemental LOSRIWP: Phase 2, Revision 3. Please ensure that all copies of the final work plans including this approval letter are placed in the document repositories established for the site. If you have any questions, please write to me at parag.amin@dec.ny.gov.

Sincerely,

Parag Amin, P.E. Project Manager

Remedial Bureau C

Division of Environmental Remediation

K. VanLandingham, EHS Support Inc. D. Crosby, NYSDEC, DER G. Rys, NYSDOH ec:



February 27, 2015

Mr. Parag Amin, P.E. New York State Department of Environmental Conservation Division of Environmental Remediation Remediation Bureau C, 11th floor 625 Broadway Albany, New York 12233-7014

RE: Response to NYSDEC comments dated February 13, 2015
Revised Supplemental Limited On-Site Remedial Investigation Work Plan – Phase 2
Universal Waste Site – Registry No, 633009
Leland and Wurz Avenues, City of Utica, Oneida County

Dear Mr. Amin:

On behalf of ELG Utica Alloys, Inc. ("ELGUA"), EHS Support LLC ("EHS Support") is in receipt of the New York State Department of Environmental Conservation ("Department" or "NYSDEC")'s email dated February 13, 2015 providing comments on the *Revised Supplemental Limited On-Site Remedial Investigation (LOSRI) Work Plan – Phase 2* ("Phase 2 Work Plan") (transmitted to the Department on January 9, 2015). We appreciate the Department's comments and have addressed each of the comments as provided below in **bold** text. The revised Work Plan addressing the Department's comments is attached.

NYSDEC Comment #1: Non-sewer line related test trenching/pitting

Please replace the words "...will extend to the depth of the top of the water table.." with the "...maximum depth practicable...". Depending upon the sub-surface conditions during test pitting, test pits could be extended below GW level. The Department will make the decision on the field to terminate the test pitting/trenching based on the field observations.

ELGUA Response #1:

The words "...will extend to the depth of the top of the water table..." have been replaced with "...maximum depth practicable". However, language has also been added to establish the definition of the "maximum depth practicable" as the depth at which groundwater begins to enter and accumulate in the test pit/trench. This will eliminate the handling of saturated soils.

NYSDEC Comment #2: Debris Piles/Berms Characterization

Please identify the piles containing waste tires.

ELGUA Response #2:

The locations of the piles containing waste tires have been identified on Figure 5.



NYSDEC Comment #3a: Sewer line Investigation Plan "B" - Pipe Bedding Investigation

Plan calls for attempting to locate the manholes on sanitary and sewer lines. Please describe how that would be accomplished.

ELGUA Response 3a:

Engineering drawings of the sanitary and storm water sewer lines that traverse the Site have been provided by the City of Utica and were included in Attachment A of the Work Plan. On these figures, several manholes are shown along the sanitary and storm water lines. Now that the storm water line has been located at the Site, EHS Support hopes to use the distance measurements from the engineering drawings to locate the storm sewer manhole located approximately 500 feet from Leland Avenue using a backhoe or excavator. If this storm sewer manhole can be located, its location will be used to attempt to locate the sanitary manhole (located approximately 418 feet east of the sanitary manhole at the intersection of Leland and Wurz Avenues) based on measurements provided on the engineering drawings using a backhoe or excavator.

NYSDEC Comment #3b: Sewer line Investigation Plan "B" - Pipe Bedding Investigation

Plan indicates that the sample will be collected from 2' below the invert. Soil sample must also be collected from the intervals where field observations (visual, fluorescence, olfactory, PIDs etc.) indicates potential signs of contamination.

ELGUA Response 3b:

The purpose of the proposed Pipe Bedding Investigation is to determine whether or not the <u>bedding</u> material located beneath the sewer line(s) is potentially a preferential pathway for contaminants. Therefore, any samples collected as part of this specific investigation need to be from the approximate invert of the pipe to 2 feet below the invert of the pipe. Visual and olfactory along with PID response will be used to assist in determining which portion of the sample interval to send to the laboratory for analysis.

NYSDEC Comment #3c: Sewer line Investigation Plan "B" – Pipe Bedding Investigation

Plan indicates that, if the sanitary sewer line is located, the boring will be placed between storm water and sewer lines. Past reports has indicated that the sewer line is plugged at the man hole on the Wurz/Leland Ave intersection and could not be traced. Describe how EHS plans to attempt to locate sewer line.

ELG Response #3c:

The engineering plans provided by the City of Utica show a sanitary manhole located approximately 418 feet east of the sanitary manhole located at the intersection of Leland and Wurz Avenues line. If this easternmost sanitary manhole can be located as described in Response 3a and is accessible, it may be possible to locate the sewer line from this manhole using a Scout Sonde and line locator which was used to locate the storm water sewer line.



NYDEC Comment #4: Schedule

The Department is unable to accept project schedule. It does not include all the elements and the tasks e.g. submission of reports, IRMs, task start date and actual or projected end dates etc. Also, to avoid confusion, it is preferable to update (by include additional/new task identified and updating start/end dates as the RI had progressed) the project schedule in the format approved in the original LOSRIWP (i.e. Gannet Chart). Please note that any changes/revisions to the project schedule needs Department's approval.

ELGUA Response #4:

The schedule provided in the Work Plan was only intended to cover the tasks proposed specifically in the Work Plan. However, at the Department's request a comprehensive project is provided as Figure 7 of the revised Work Plan.

NYSDEC Comment #5: Figures 5

Please include the description of the symbols used in the figure (Legends). Figure is too crowded. Please remove the contour lines. Just show pile boundary lines. Also identify the piles containing waste tires.

ELGUA Response #5:

The requested revisions have been made to Figure 5 of the revised Work Plan.

NYSDEC Comment #6: Figures 6

Please include the description of the symbols used in the figure (Legends). Figure is too crowded. Please remove the contour lines. Once the depths, locations of the pipes, manholes etc. is determined/known, please include the cross sectional diagram showing various elevations along the length of the pipes and resubmit the figure.

ELGUA Response #6:

Figure 6 has been modified as requested. However, the figure cannot be edited to show the depths, locations of the pipes, manholes, etc. until after the investigation has been completed. Any of this information gathered during the investigation will be provided on a figure to be included in the final Remedial Investigation (RI) Report.



If you have any questions or comments, please feel free to contact me at 850-544-9219 or Kristin VanLandingham at 850-251-0582.

Sincerely,

Mark J. Smith Project Manager

cc: Mike Ryan, NYSDEC

MIRX

George Heitzman, NYSDEC David Crosby, NYSDEC Fred Schweizer, ELGUA Andy Patz, EHS Support

Attachments

Kristin A. VanLandingham, P.E. Project Engineer/Director

Kusta Van Jandingham



February 27, 2015

Mr. Parag Amin, P.E. New York State Department of Environmental Conservation Division of Environmental Remediation Remediation Bureau C, 11th floor 625 Broadway Albany, New York 12233-7014

RE: Supplemental Limited On-Site Remedial Investigation Work Plan – Phase 2 (Revision 3)

<u>Universal Waste Site – Registry No. 633009</u>

Leland and Wurz Avenues, Utica, New York, Oneida County

Dear Mr. Amin:

EHS Support LLC (EHS Support), on behalf of ELG Utica Alloys, Inc. (ELGUA), is submitting this Revised *Supplemental Limited On-Site Remedial Investigation (LOSRI) Work Plan – Phase 2* (Work Plan) for the above-referenced site (the Site) for the New York State Department of Environmental Conservation's (NYSDEC or the Department) review and approval. This Work Plan has been revised to address NYSDEC comments in a letter dated November 24, 2014.

NON-SEWER LINE RELATED TEST TRENCHING/PITTING

During the Site visit with the NYSDEC on September 30, 2014, the Department identified areas where test pitting was required. Based on discussions with the Department during the September 30, 2014 Site visit, ELGUA will install test trenches/pits (where accessible) as shown on **Figure 1A** through **1E**. Each test trench will be the width of an excavator bucket (approximately 2 feet (ft) and will extend to the maximum depth practicable. The maximum depth practicable is defined as, the depth at which groundwater begins to enter and accumulate in the test pit/trench. This will eliminate the handling of saturated soils. During the test trenching/pitting, soil samples will be collected from the test pit/trench bottom every 20 liner ft except at those locations which correspond with a previous soil sampling location. In addition, a 20-ft by 20-ft test pit (to the top of the water table) will be dug in and around the pile of ceramic insulators and location of suspected transformer near sample location I7. At least one soil sample will be collected from the bottom of this test pit. Grab samples will be collected by hand or from the excavator bucket where safety issues are a concern (depth of sample).

All soil samples collected during this investigation will be analyzed for the following constituents by the ELAP-certified laboratory Accutest and in accordance with the Department-approved *August 2014 Revised Sampling and Analyses Plan (SAP)* and the Department-approved *August 2014 Revised Quality Assurance Project Plan (QAPP)*:

 Polychlorinated biphenyls (PCBs) (as Aroclors) by United States Environmental Protection Agency (USEPA) Method 8082A

In addition, one soil sample from each test trench/pit will be analyzed for the following:

- Full Target Compound List (TCL) Volatile Organic Compounds (VOCs) by USEPA Method 8260C
- Full TCL Semi-volatile Organic Compounds (SVOCs) by USEPA Method 8270D



- Tentatively identified compounds (TIC) will also be analyzed for the 30 (10 VOCs and 20 SVOCs) highest concentrations
- Target Analyte List (TAL) Metals by USEPA Method 6000-7000 Series
- Total Cyanide with extraction by USEPA Method 9012-9010A and analysis by American Society for Testing and Materials (ASTM) Method D4282-02 (microdiffusion)
- TCL Pesticides by USEPA Method 8081B
- TCL Herbicides by USEPA Method 8151A

These sample locations will be selected in the field based on 1) visual and/or olfactory observations or 2) elevated readings are measured using a photo-ionization detector (PID) indicating the possible presence of VOCs. Five percent (5%) of the soil samples will be collected in duplicate for total PCB analyses only.

ELGUA will also install one continuous test trench around the large pile/berm located on the eastern Site boundary as shown in **Figure 2**. This test trench will be the width of an excavator bucket (approximately 2 ft) and will extend in depth to the top of the water table.

During the berm test trenching, soil samples will be collected from the test trench bottom every 50 liner ft except at those locations which correspond with a previous soil sampling location. Grab samples will be collected by hand or from the excavator bucket where safety issues are a concern (depth of sample).

All soil samples collected from the berm perimeter test trench will be analyzed for the following constituents by the ELAP-certified laboratory Accutest and in accordance with the Department-approved *August 2014 Revised Sampling and Analyses Plan (SAP)* and the Department-approved *August 2014 Revised Quality Assurance Project Plan (QAPP)*:

• PCBs (as Aroclors) by USEPA Method 8082A

In addition, five soil samples from the berm test trench will be analyzed for the following:

- Full TCL VOCs by USEPA Method 8260C
- Full TCL SVOCs by USEPA Method 8270D
- TICs will also be analyzed for the 30 (10 VOCs and 20 SVOCs) highest concentrations
- TAL Metals by USEPA Method 6000-7000 Series
- Total Cyanide with extraction by USEPA Method 9012-9010A and analysis by American Society for Testing and Materials (ASTM) Method D4282-02 (microdiffusion)
- TCL Pesticides by USEPA Method 8081B
- TCL Herbicides by USEPA Method 8151A

These sample locations will be selected in the field based on 1) visual and/or olfactory observations or 2) elevated readings are measured using a PID indicating the possible presence of VOCs. Five percent (5%) of the soil samples will be collected in duplicate for total PCB analyses only.

All soils removed during the trenching/pitting will be returned to the excavation after the completion of visual observation and/or sampling.

VERTICAL DELINEATION AT PREVIOUS SOIL BORING LOCATIONS

Pursuant to the Additional Soil Investigation and Test Pitting Work Plan dated July 9, 2014 and the Department comment letter dated September 29, 2014, ten (10) soil boring locations previously sampled during October 2013 were identified for resampling due to poor soil recovery (**Figure 3**). As proposed in the Department-approved Supplemental LOSRI Work Plan – Phase 1 dated October 8, 2014, ELGUA



proposed to collect a soil sample immediately adjacent to each of the ten (10) existing boring locations. This work was initiated during the week of October 13, 2014 but due to continued issues with poor soil recovery only samples from boring B14 could be collected for analyses. After discussions with onsite NYSDEC oversight personnel, the decision was made to discontinue the sampling and to propose another means for collecting the vertical delineation samples. Therefore, ELGUA proposes to collect soil samples at each of the nine (9) remaining locations using an excavator. **Table 1** shows the samples intervals that were collected during the October 2013 sampling event and the analyses performed. ELGUA proposes to collect only those depth intervals not able to be collected during the October 2013 sampling event and analyze them according to **Table 1**.

All soil samples collected will be analyzed by the ELAP-certified laboratory Accutest and in accordance with the Department-approved *August 2014 Revised Sampling and Analyses Plan (SAP)* and the Department-approved *August 2014 Revised Quality Assurance Project Plan (QAPP)*. Five percent (5%) of the soil samples will be collected in duplicate for total PCB analyses only.

All soils removed during the trenching to achieve vertical delineation will be returned to the excavation after the completion of visual observation and/or sampling.

DEBRIS PILE/BERM CHARACTERIZATION

As discussed with the Department during the Site meeting on September 30, 2014, ELGUA needs to have a better understanding of the character of the debris piles at the Site in order to consider a potential interim remedial measure (IRM) for the removal of the piles. Therefore, ELGUA proposes to use an excavator to trench into the large debris pile/berm located on the eastern property boundary as shown on **Figure 4**. Each trench will extend into the pile only as far as the excavator bucket will reach. One (1) sample will be collected from each trench. In addition, one grab soil sample will be collected from each of the fifteen (15) smaller debris piles located on-site either by hand or from the excavator bucket (**Figure 5**). Based on field observation, it appears that all 15 of these smaller debris piles contain soil. All soil samples will be analyzed for the following constituents by the ELAP-certified laboratory Accutest and in accordance with the Department-approved *August 2014 Revised Sampling and Analyses Plan (SAP)* and the Department-approved *August 2014 Revised Quality Assurance Project Plan (QAPP)*:

- Total PCBs
- TCL VOCs, SVOCs, herbicides, and pesticides
- Toxicity Characteristic Leaching Procedure (TCLP) VOCs
- TCLP SVOCs
- TCLP Metals
- TCLP Mercury
- TAL Metals
- Total Petroleum Hydrocarbons (DRO/GRO)
- Corrosivity
- Ignitability
- Reactive Cyanide and Sulfide
- Total Organic Halogens

All soils removed during the debris pile/berm sampling will be returned to the originating pile after the completion of visual observation and/or sampling.



SEWER LINE INVESTIGATION PLAN "B" – PIPE BEDDING INVESTIGATION

Pursuant to the Department-approved Supplemental LOSRI Work Plan – Phase 1, the City of Utica's preferred plumbing contractor, Shamrock Sewer Services, LLC, located approximately 500 ft of the storm sewer line that transects the Site using a Scout Sonde and line locator on October 15, 2014. At approximately 500 ft from the manhole located in the intersection of Wurz and Leland Avenues, the Sonde met refusal. It is unknown what is causing the refusal but it could be an obstruction in the pipe or a manhole. However, the location and depth information gained will allow ELGUA to investigate the pipe bedding as discussed with the Department during the September 30, 2014 Site meeting. The storm sewer line was surveyed during November 2014 and its location is provided on **Figure 6**. During the trenching work proposed in this work plan, ELGUA will attempt to locate the on-site manholes for the storm and sanitary sewers as shown on the attached figures provided by the City of Utica (**Attachment A**).

If the sanitary sewer manhole can be located and is accessible, ELGUA will use Shamrock Sewer Services, LLC, to attempt to locate the line (and its approximate depth) using a Scout Sonde and line locator as was done for the storm sewer line. Once the lines have been accurately located and marked at the Site, ELGUA will attempt to collect samples on approximately 100-ft intervals along the storm sewer line using hollow-stem auger and split spoons. Each boring will be installed within two (2) feet of the sewer line location and samples will be collected from approximately zero (0) to two (2) ft below elevation of the invert of the pipe. Visual and olfactory observations, along with PID responses will be used to assist in determining which portion of the sample interval will be sent to the laboratory for analysis. If the sanitary line can be accurately located, these borings will be placed between the sanitary and storm sewer lines, if possible. Due to the depth of the sewer line below the water table, soil recovery may be difficult as has been experienced during previous soil sampling events at the Site. Therefore, in the event that a soil sample cannot be obtained from the borings, piezometers will be installed at each location and groundwater samples will be collected. If the on-site manholes still exist, as noted in the **Attachment A**, and can be located and accessed, depth to the invert to the pipes will be assessed to better target the sampling depth and piezometer screened interval should it be necessary.

All soil samples and/or groundwater samples will be analyzed for the following constituents by the ELAP-certified laboratory Accutest and in accordance with the Department-approved *August 2014 Revised Sampling and Analyses Plan (SAP)* and the Department-approved *August 2014 Revised Quality Assurance Project Plan (QAPP)*:

- PCBs (as Aroclors) by USEPA Method 8082A (for soil) and USEPA Method 608 (for groundwater)
- Full TCL VOCs by USEPA Method 8260C
- Full TCL SVOCs by USEPA Method 8270D
- TICs will also be analyzed for the 30 (10 VOCs and 20 SVOCs) highest concentrations
- TAL Metals by USEPA Method 6000-7000 Series
- Total Cyanide with extraction by USEPA Method 9012-9010A and analysis by American Society for Testing and Materials (ASTM) Method D4282-02 (microdiffusion)
- TCL Pesticides by USEPA Method 8081B
- TCL Herbicides by USEPA Method 8151A

Five percent (5%) of the soil samples will be collected in duplicate for total PCB analyses only.



SCHEDULE

A project schedule is provided as **Figure 7**.

If you have any questions or comments, please feel free to contact me at 850-251-0582.

Sincerely,

Kristin A. VanLandingham, P.E.

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Project Manager/Engineer



TABLE 1 PROPOSED VERTICAL DELINEATION SAMPLE DEPTHS AND ANALYSES

UNIVERSAL WASTE UTICA, NY

Sample ID		Analytical Analyses							Location	
	Depth	PCBs Herbicides Metals Pesticides SVOCs VOCs Mercury								
		8082 A	8151A	6010C	8081B	8270D	8260C	7471B	Northing	Easting
C13	0-2"	٧	٧	٧	٧	٧	٧	٧	1134085.081	1186163.652
	2"-2'	٧	٧	٧	٧	٧	٧	٧		
	2'-4'	٧								
	4'-6'	Х								
	6'-8'	Х								
	8'-10'	Х	Х	Х	Х	X	Х	Х		
D8-NE	0-2"	٧							1134516.250	1186518.280
	2"-2'	٧								
	2'-4'	Х								
	4'-6'	X								
	6'-8'	X								
	8'-10'	Х								
D13	0-2"	X					X		1134034.854	1186258.950
	2"-2'	X					X			
	2'-4' 4'-6'	X V					X V			
	6'-8'									
	8'-10'	X					X			
	0-2"	۸ ٧					^			
E5	2"-2'	V							1134683.706	1186736.697
	2'-4'	X								
	4'-6'	X								
	6'-8'	X								
	8'-10'	X								
F10	0-2"	٧	٧	٧	٧	٧	٧	٧	1134197.060	1186578.972
	2"-2'	٧	٧	٧	٧	٧	٧	٧		
	2'-4'	Х								
	4'-6'	Х								
	6'-8'	Х								
	8'-10'	Х	Х	Х	Х	Х	Х	Х		
G5	0-2"	٧							1134583.684	1186910.252
	2"-2'	٧								
	2'-4'	Х								
	4'-6'	Х								
	6'-8'	Х								
	8'-10'	Х								
G8	0-2"	٧	٧	٧	٧	٧	٧	٧	1134321.732	1186763.489
	2"-2'	٧	٧	٧	٧	٧	٧	٧		
	2'-4'	٧								
	4'-6'	٧								
	6'-8'	٧	٧	٧	٧	٧	٧	٧		
	8'-10'	Х								
G13	0-2"	٧	٧	٧	٧	٧	٧	٧	1133902.155	1186528.474
	2"-2'	٧	٧	٧	٧	٧	٧	٧		
	2'-4'	٧								
	4'-6'	٧	٧	٧	٧	٧	٧	٧		
	6'-8'	X								
Н2	8'-10'	X							1134795.289	1187143.995
	0-2"	٧	٧	٧	٧	٧	٧	٧		
	2"-2'	٧	٧	٧	٧	٧	٧	٧		
	2'-4'	X			-					
	4'-6' 6'-8'	X			-					
	8'-10'	X	Х	Х	Х	Х	Х	Х		
	910.	Х	Х	Х	Х	X	Х	Х		

Notes:

v = Depth sampled and analyzed during October 2013

X = Proposed sample depth and analyses

PCBs = polychlorinated biphenyls

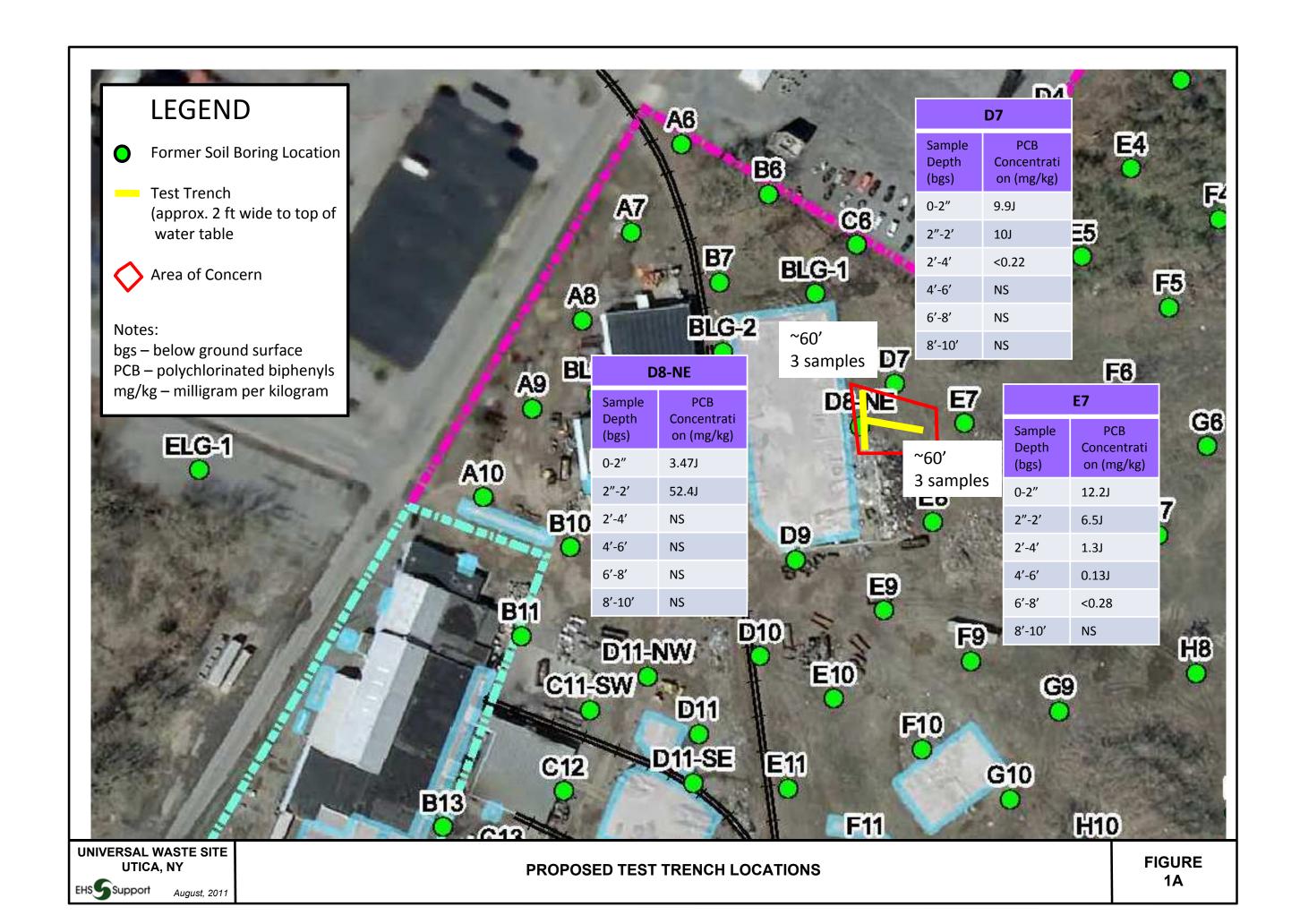
VOCs = volatile organic compounds

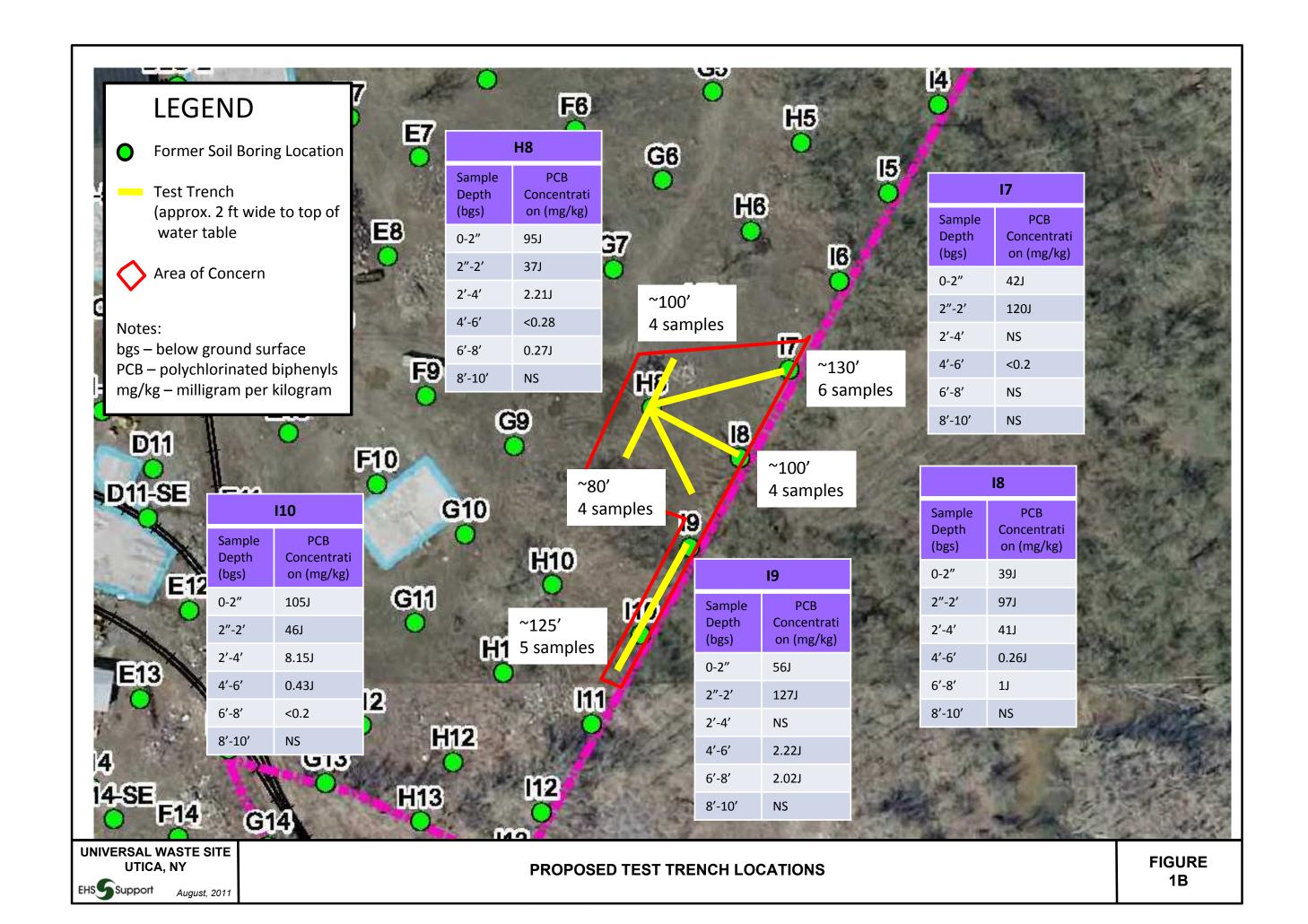
SVOCs = semi-volatile organic compounds

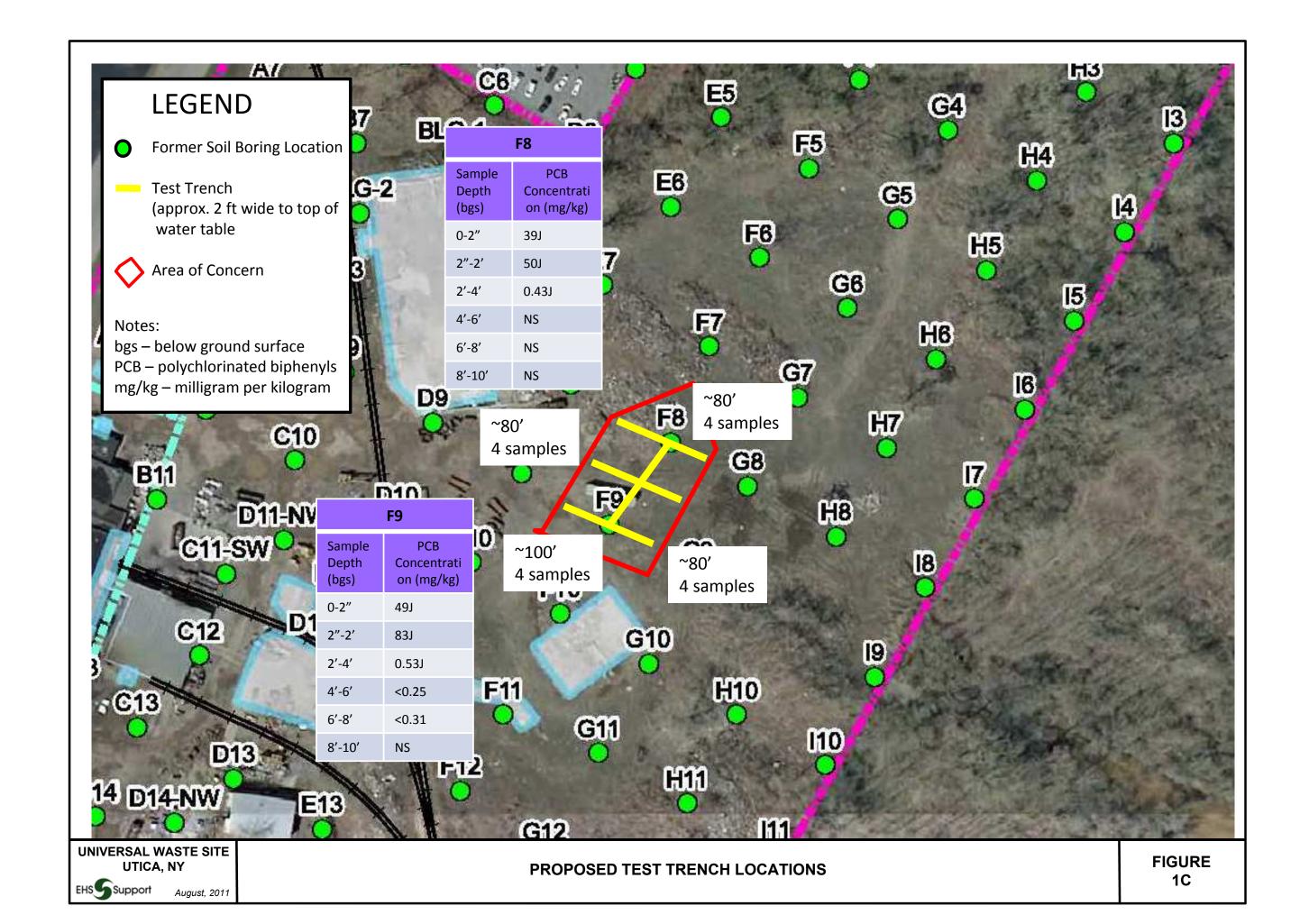


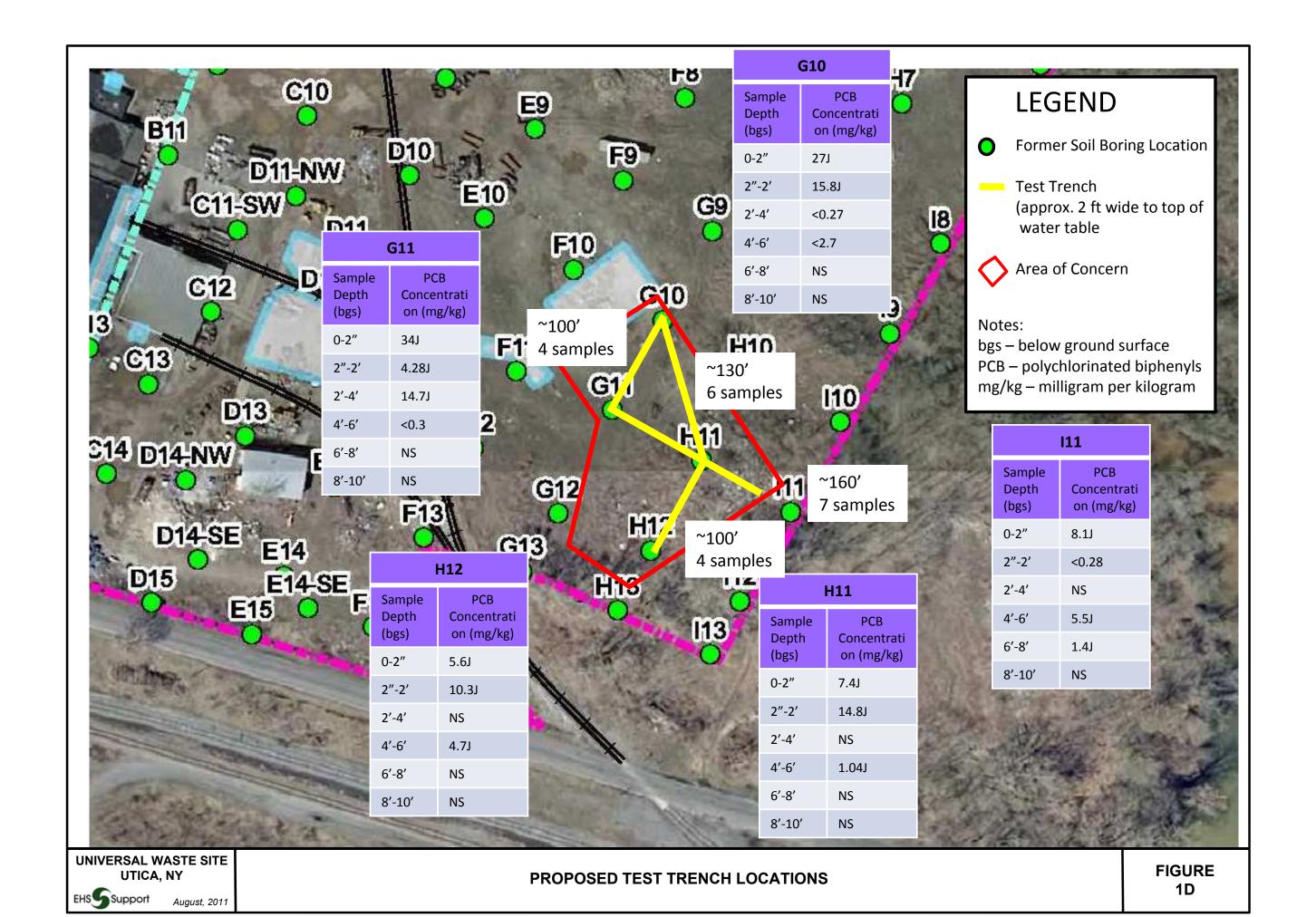
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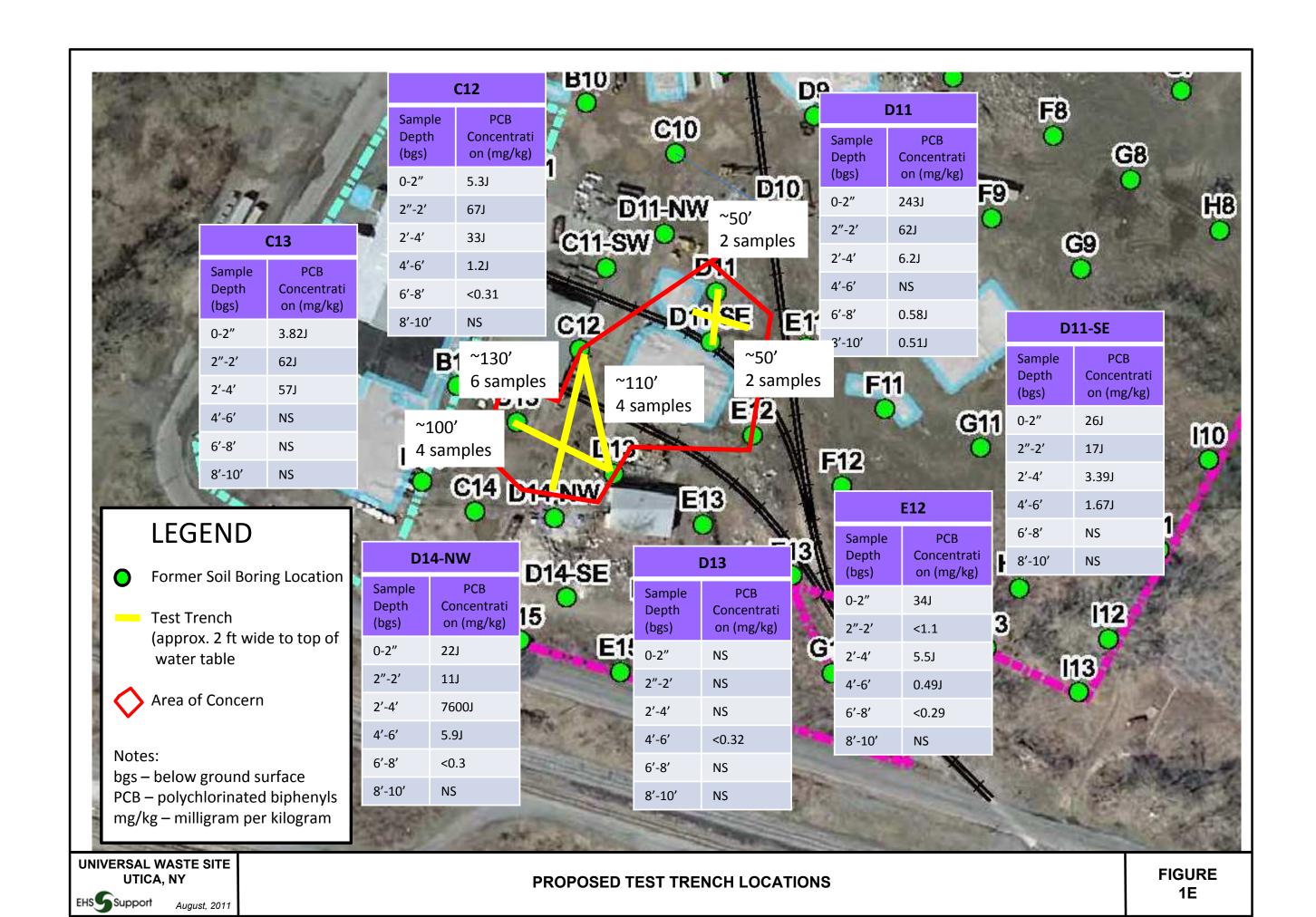
FIGURES

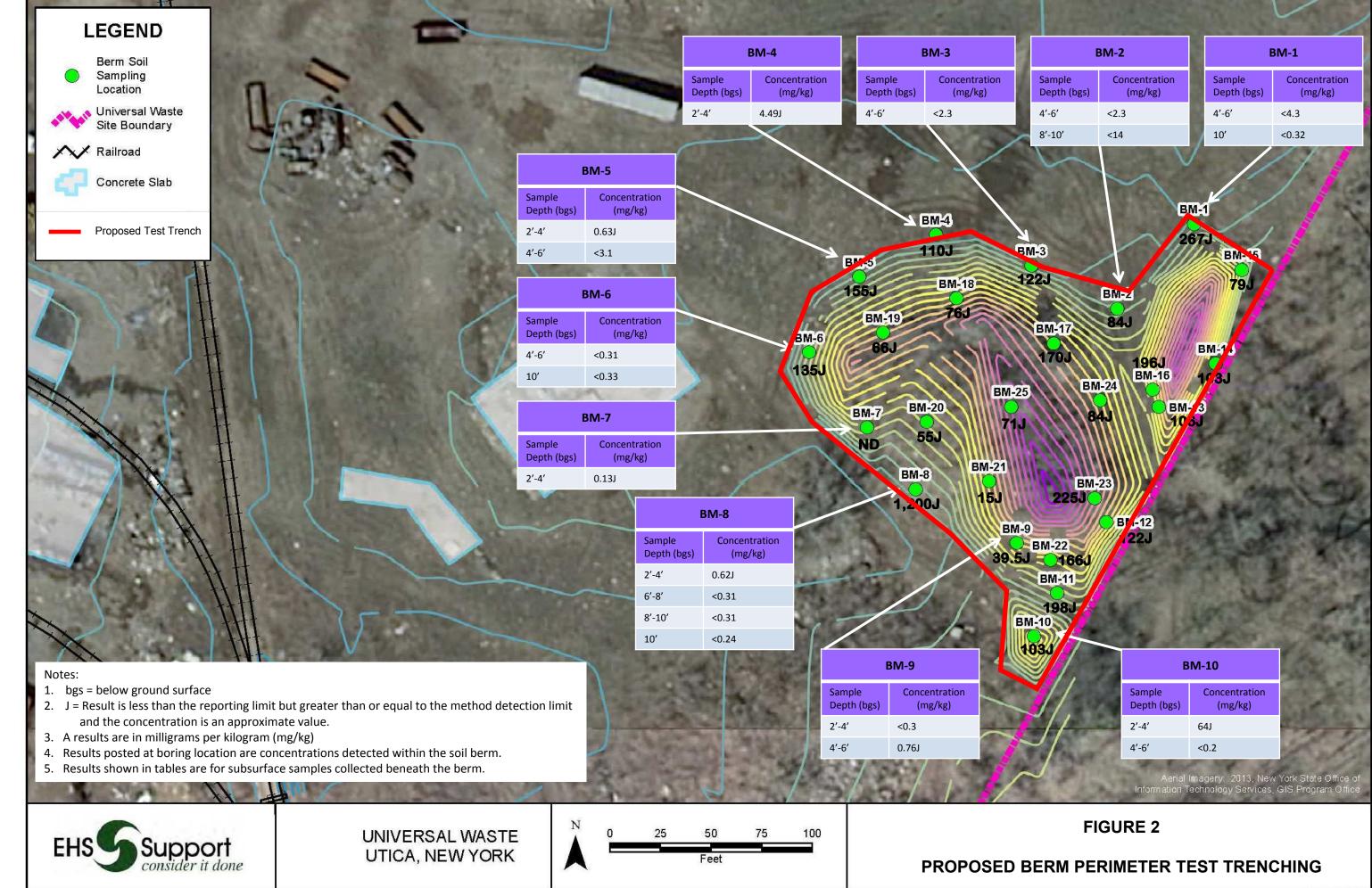


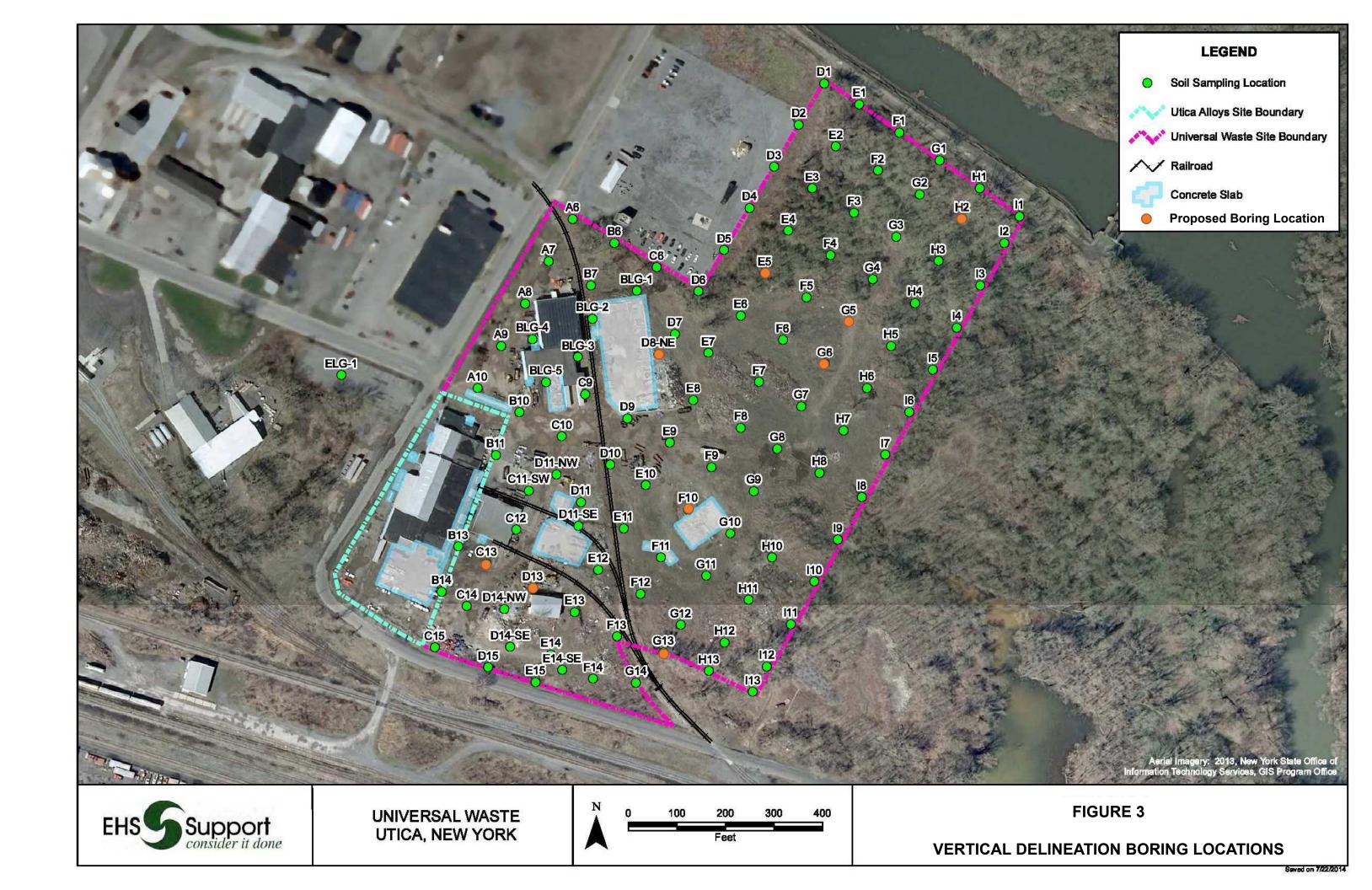


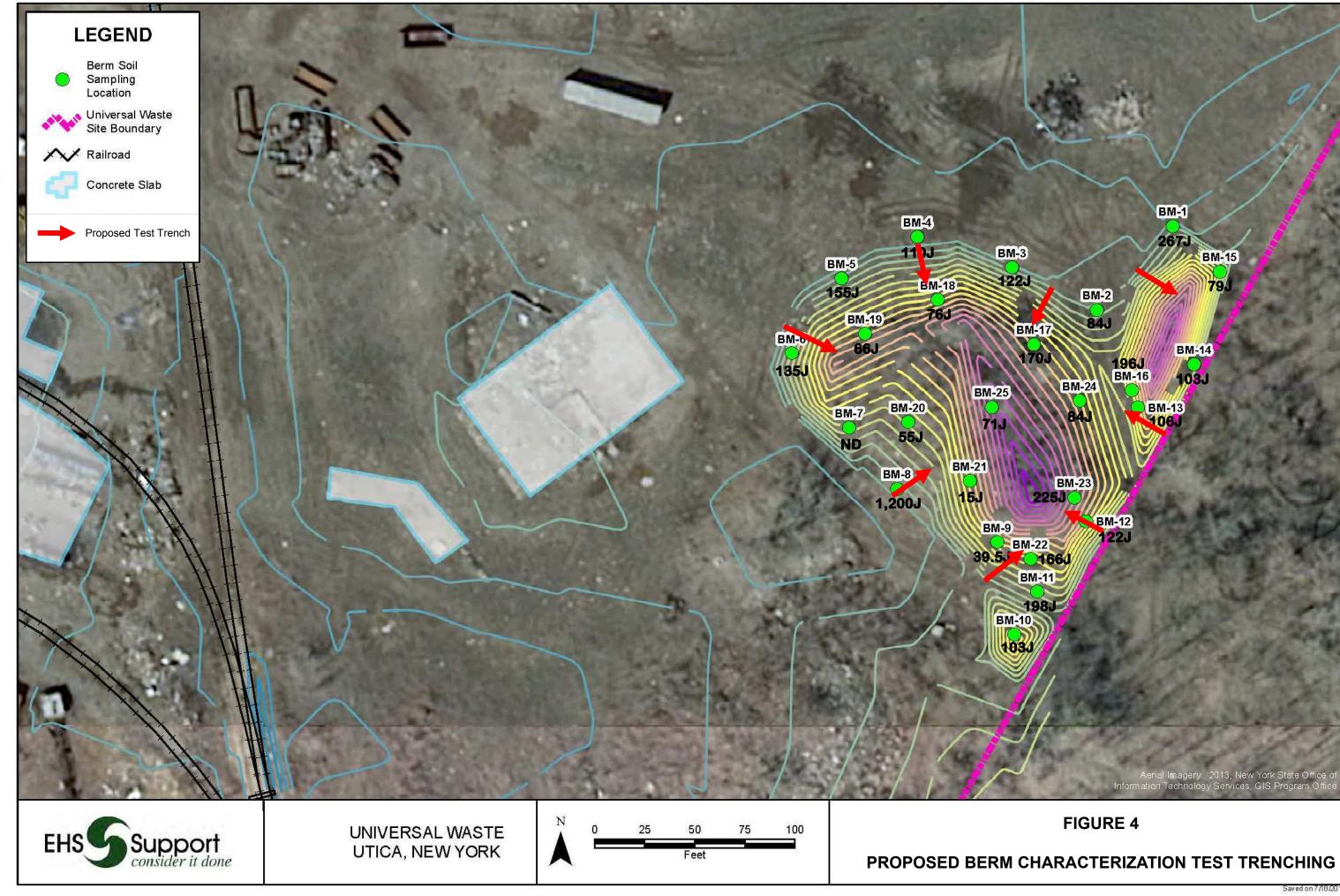


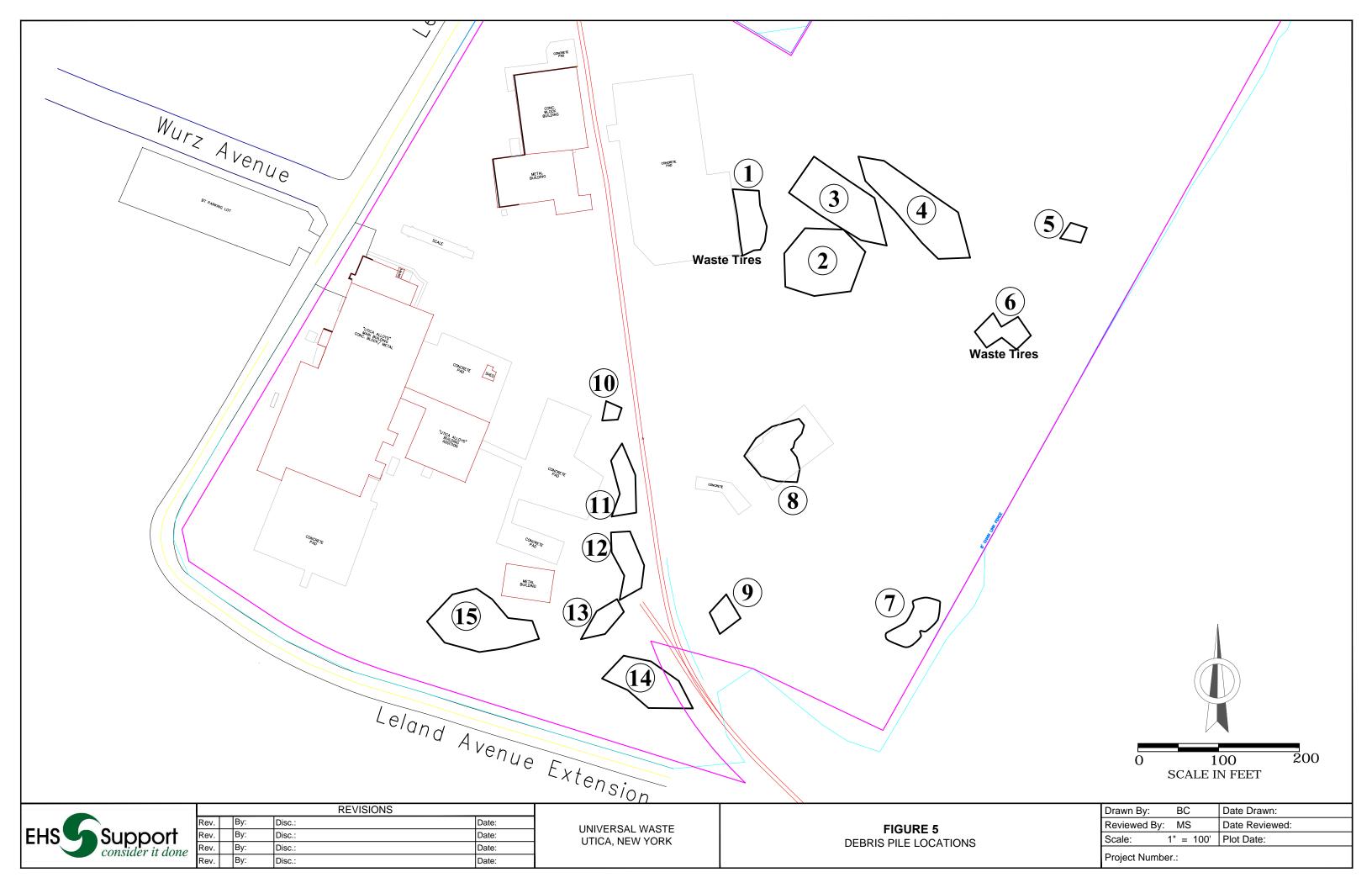


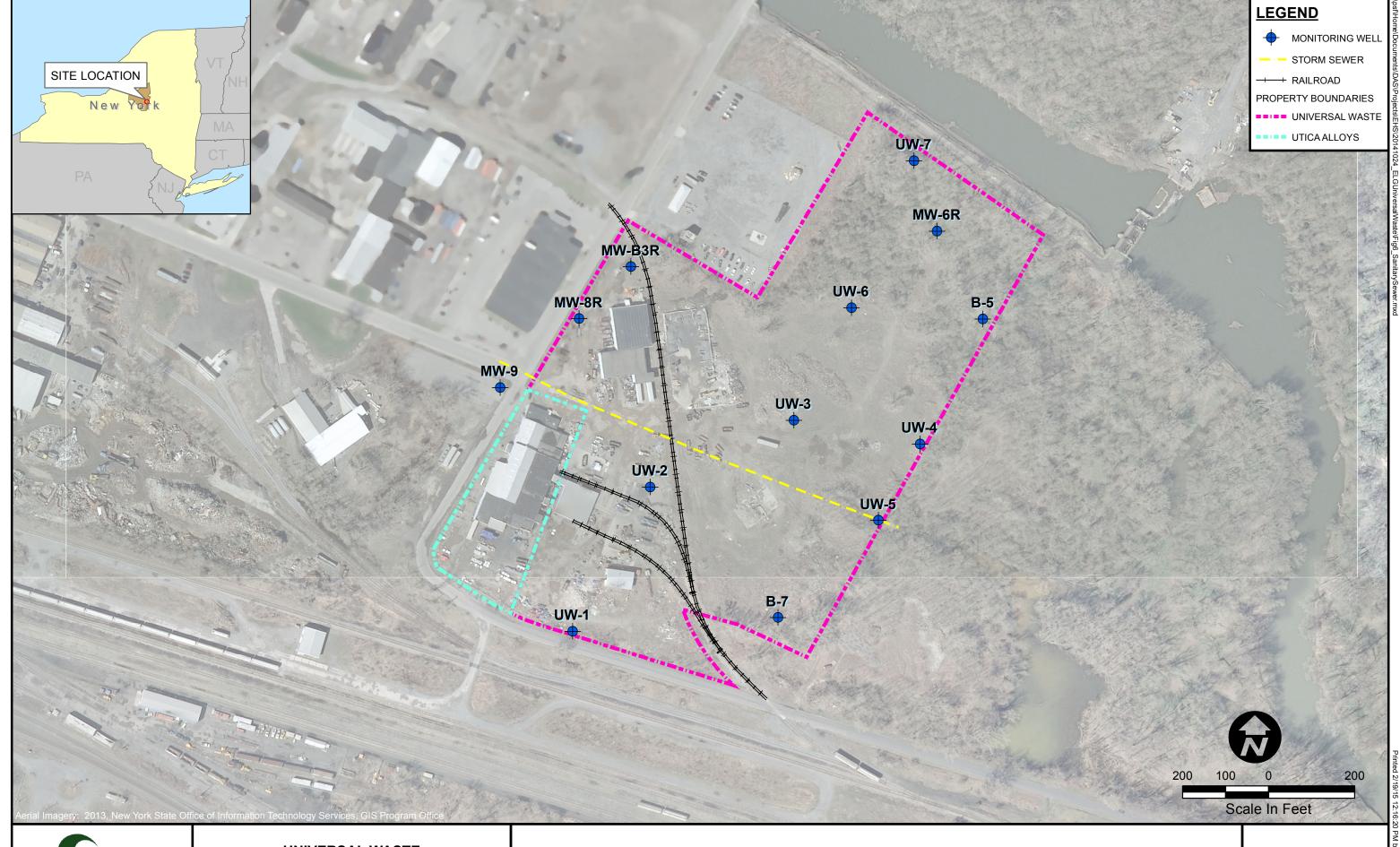




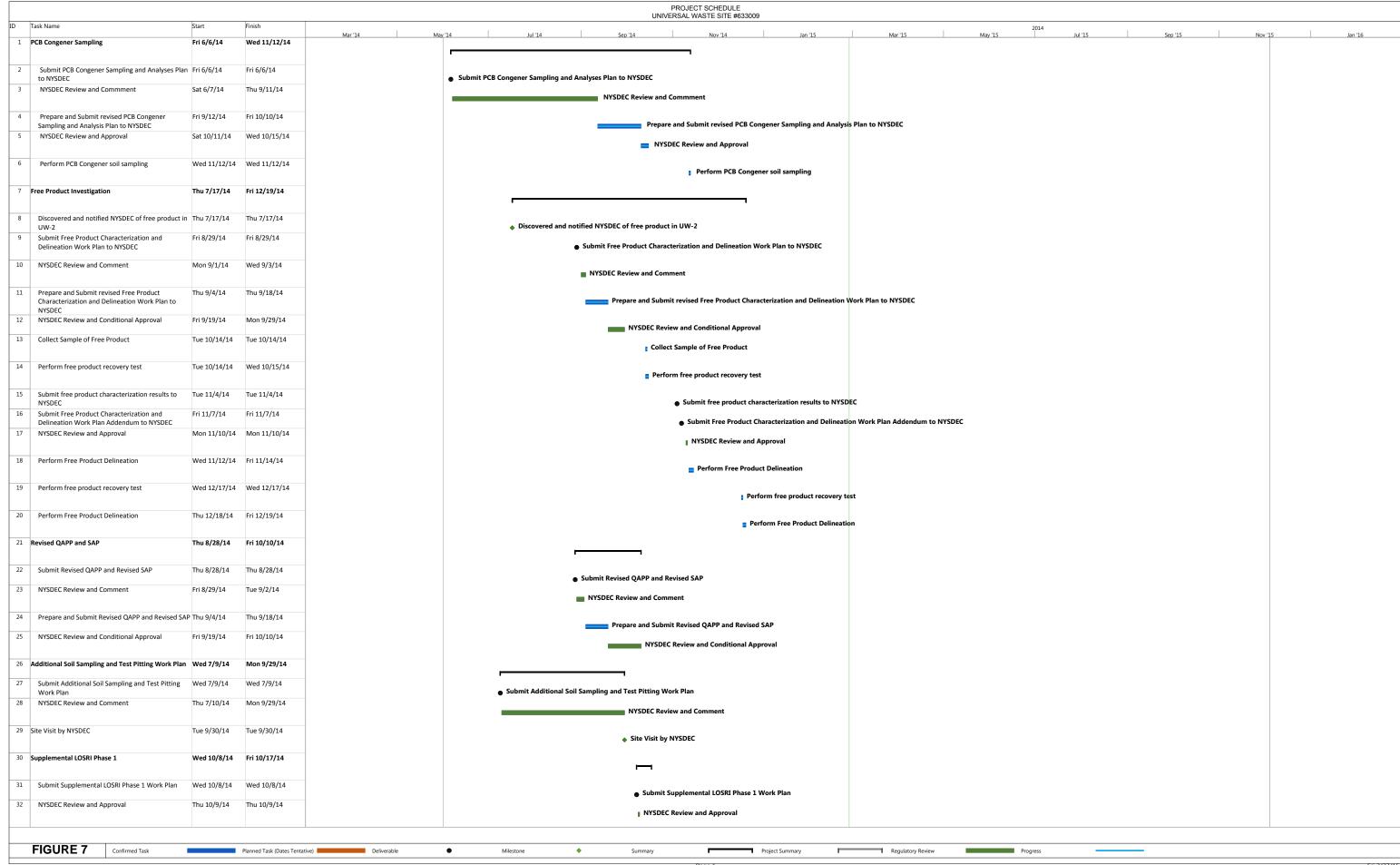


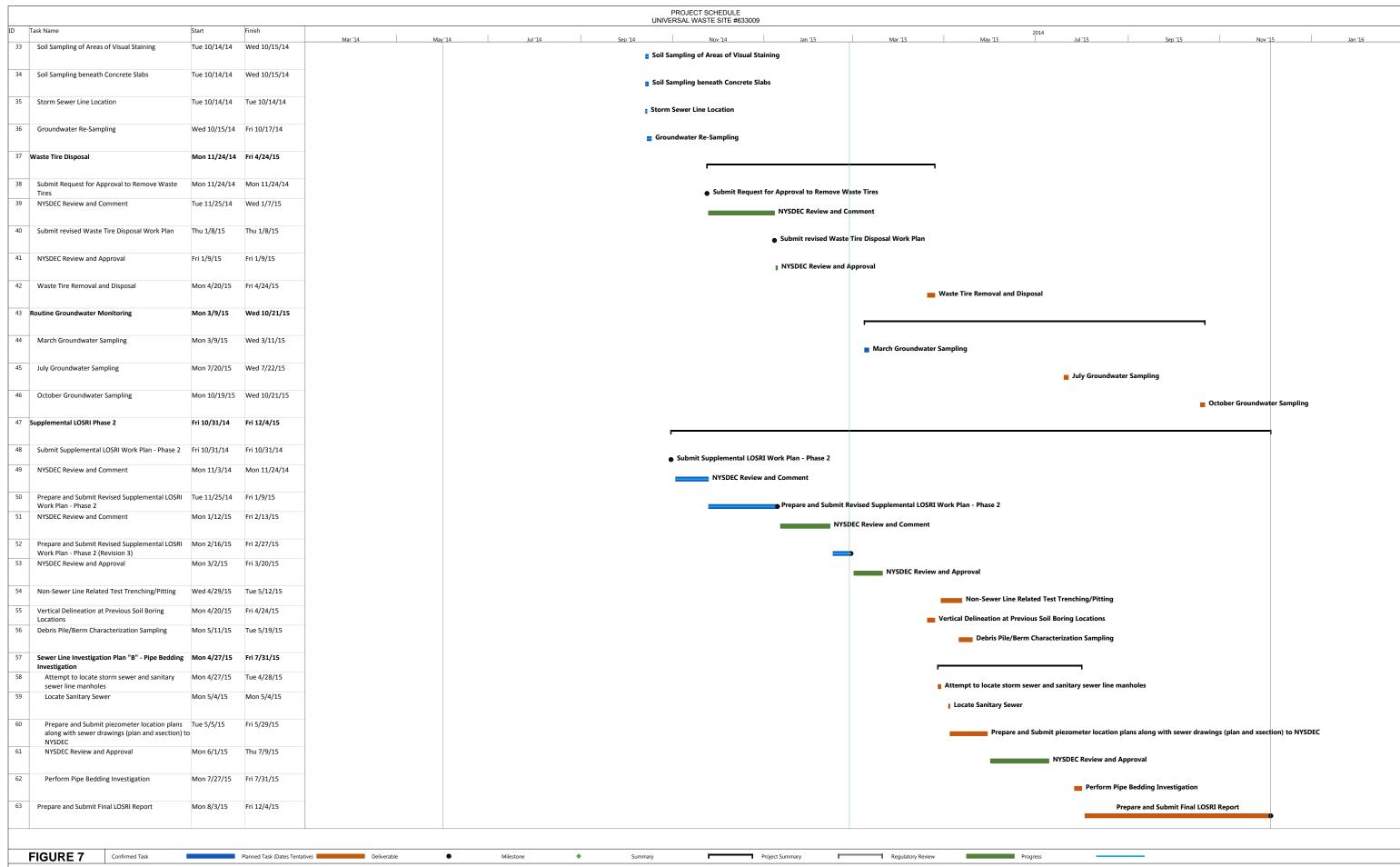






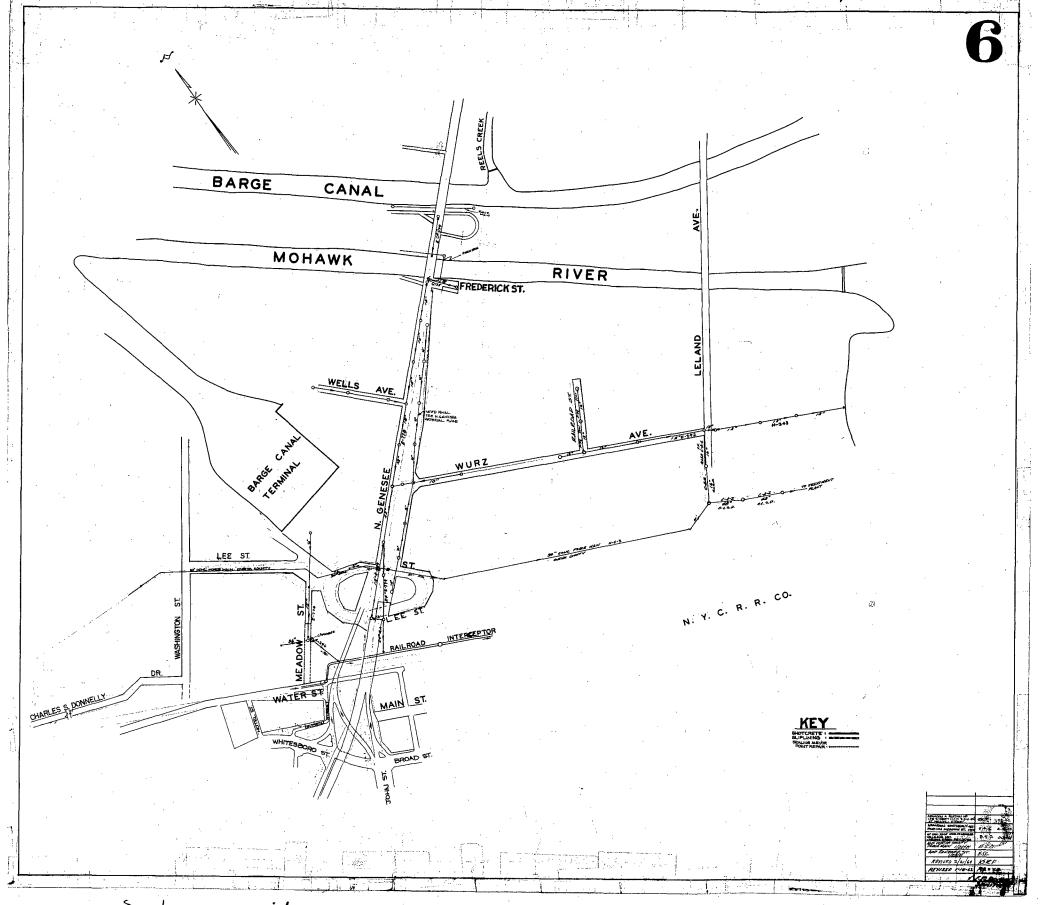
EHS Support consider it done





ATTACHMENT A

Utica Engineering - Sanitary Sewers



Sanitary sewer index

