

## Study Area Pre-Design Investigation Work Plan Addendum Number 3 Additional Field Investigation Activities

Site Name and Location: Study Area, Corning, NY

Order on Consent and Administrative Settlement: NYSDEC Project ID 851046

Corning Incorporated Project Coordinator: Mike Ford

**NYSDEC Project Coordinator:** Kelly Cloyd

Approval Date: March 21, 2019

## **Introduction**

Weston Solutions, Inc. (WESTON®), on behalf of Corning Incorporated, has prepared this Pre-Design Investigation Work Plan Addendum Number 3 (PDI Work Plan Addendum 3) for additional field investigation activities within the Study Area¹ to supplement the New York State Department of Environmental Conservation (NYSDEC) approved Pre-Design Investigation Work Plan (PDI Work Plan; January 2018), the NYSDEC-approved Pre-Design Investigation Work Plan Addendum Number 1 (PDI Work Plan Addendum 1; May 2018) and the NYSDEC-approved Pre-Design Investigation Work Plan Addendum Number 2 (PDI Work Plan Addendum 2; November 2018). The PDI Work Plan is being implemented pursuant to the Order on Consent and Administrative Settlement between NYSDEC and Corning Incorporated (December 2017 Order on Consent).

The additional field investigation activities are being conducted at the request of the NYSDEC to gather additional data to assist in defining the extent of Subject Material<sup>2</sup>, and support remedial design.

Based on the analytical results of samples at properties listed in Table 1, and/or adjacent properties, NYSDEC is requiring additional sampling at certain properties listed in Table 1 in accordance with the PDI Work Plan. As noted in Table 1, NYSDEC does not require additional sampling of certain other properties identified in Table 1.

The planned sampling described in PDI Work Plan Addendum 3 will be collected for characterization purposes and final endpoint confirmation purposes, and samples collected will be analyzed by a New York State Department of Health (NYSDOH) Environmental

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<sup>&</sup>lt;sup>1</sup> The Study Area is bound by the Chemung River to the south; Post Creek and Interstate 86 to the east and north; and the Guthrie Medical Center, the City of Corning Fire Department, and Centerway to the west.

<sup>&</sup>lt;sup>2</sup> Subject Material as defined in the PDI Work Plan (WESTON; January 2018).



# Study Area Pre-Design Investigation Work Plan Addendum Number 3 Additional Field Investigation Activities Study Area, Corning, NY NYSDEC Project ID 851046 (continued)

Laboratory Approval Program (ELAP)-certified laboratory, in accordance with the Quality Assurance Project Plan (QAPP) provided in Appendix C of the PDI Work Plan.

Due to the confidential nature of sample collection on private properties, no sampling location maps are included in this PDI Work Plan Addendum 3. The additional investigation activities are described in tabular form in Table 1. Individual properties are identified by property codes and sampling locations are described using property features and/or previous sampling locations.

The types of sampling planned in PDI Work Plan Addendum 3 are described in the PDI Work Plan, as well as the sampling category listed in Table 1 is defined in the PDI Work Plan. The sampling category dictates both the type of sample to be collected and additional steps to be taken based on field observations (e.g., if step-out borings are required).

Sampling activities will be performed using the methods and procedures described in Section 4 and Appendix D (Standard Operating Procedures) of the PDI Work Plan. Samples will be analyzed for the constituents indicated on Table 1 using the methodologies described in Section 4 and Appendix C (QAPP) of the PDI Work Plan.

## Schedule

It is anticipated that the additional investigation activities contained in this document will be performed in the spring of 2019. The additional investigation activities described in this document will be performed based on approval from NYSDEC of Addendum Number 3 and receipt of written consent to access from the property owners.

John Sontag, Jr., P.E. Sr. Project Manager



Table 1
Pre-Design Investigation Addendum 3 Sample Summary

| Number/ |          |             |                 |   |           |                        |                               |   |
|---------|----------|-------------|-----------------|---|-----------|------------------------|-------------------------------|---|
| OU      | Property | Sample Type | Number/<br>Type | Location  | Depth     | Sample Interval(s)     | Analytics                     | Notes                                     |
| OU1     | RES028   | -           | -               |   | -         | -                      | <u>-</u>                      | No additional sampling required by NYSDEC |
| OU1     | RES045   | -           | -               | -   | -         | -                      | -                             | No additional sampling required by NYSDEC |
| OU1     | RES060   | -           | -               | -   | -         | -                      | -                             | No additional sampling required by NYSDEC |
| OU1     | RES069   | Category D  | 3 SS            | Southwest property line                                     | 2 in bgs  | 0-2"                   | TAL Metals, Mercury and SVOCs | Required by NYSDEC                        |
| OU1     | RES072   | -           | -               | -   | -         | -                      | -                             | No additional sampling required by NYSDEC |
| OU1     | RES073   | -           | -               | -   | -         | -                      | -                             | No additional sampling required by NYSDEC |
| OU1     | RES076   | -           | -               | -   | -         | -                      | -                             | No additional sampling required by NYSDEC |
| OU1     | RES086   | Category D  | 1 SS            | North of driveway   | 1 SS      | 0-2"                   | TAL Metals, Mercury and SVOCs | Required by NYSDEC                        |
| 0111    | RES089   | Category D  | 1 SB            | Northwest property line                                     | 15 ft bgs | 0-2", 2-24" and native | TAL Metals, Mercury and SVOCs | Required by NYSDEC                        |
| OU1     |          | Category D  | 1 SB            | Southwest property line                                     | 2 ft bgs  | 0-2" and 2-24"         | TAL Metals, Mercury and SVOCs | Required by NYSDEC                        |
| OU5     | RES092   | Category D  | 1 SB            | East property line  | 2 ft bgs  | 0-2" and 2-24"         | TAL Metals, Mercury and SVOCs | Required by NYSDEC                        |
| OU1     | RES104   | Category D  | 3 SS            | Northeast property line                                     | 2 in bgs  | 0-2"                   | TAL Metals, Mercury and SVOCs | Required by NYSDEC                        |
| 001     |          | Category D  | 1 SS            | Southwest property line                                     | 2 in bgs  | 0-2"                   | TAL Metals, Mercury and SVOCs | Required by NYSDEC                        |
| OU1     | RES105   | 1           | -               | -   | -         | -                      | -                             | No additional sampling required by NYSDEC |
| OU1     | RES113   | -           | -               | -   | -         | -                      | -                             | No additional sampling required by NYSDEC |
| OU1     | RES114   | =           | -               | -   | -         | -                      | -                             | No additional sampling required by NYSDEC |
| OU1     | RES124   | -           | -               | -   | -         | -                      | -                             | No additional sampling required by NYSDEC |
| OU1     | RES127   | -           | -               | -   | -         | -                      | -                             | No additional sampling required by NYSDEC |
| OU1     | RES134   | -           | -               | -   | -         | -                      | -                             | No additional sampling required by NYSDEC |
| OU1     | RES135   | -           | -               | -   | -         | -                      | -                             | No additional sampling required by NYSDEC |
| OU1     | RES139   | -           | -               | -   | -         | -                      | -                             | No additional sampling required by NYSDEC |
| OU5     | RES155   | Category D  | 2 SB            | Southeast property line                                     | 15 ft bgs | 0-2", 2-24" and native | TAL Metals, Mercury and SVOCs | Required by NYSDEC                        |
| OU1     | RES156   | -           | -               | -   | -         | -                      | -                             | No additional sampling required by NYSDEC |
| OU1     | RES157   | -           | -               | -   | -         | -                      | -                             | No additional sampling required by NYSDEC |
| OU1     | RES170   | Category D  | 1 SB            | Northeast property line                                     | 15 ft bgs | 0-2", 2-24" and native | TAL Metals, Mercury and SVOCs | Required by NYSDEC                        |
| OU1     | RES175   | Category D  | 2 SS            | Northeast property line                                     | 2 in bgs  | 0-2"                   | TAL Metals, Mercury and SVOCs | Required by NYSDEC                        |
| OU1     | RES192   | Category D  | 1 SS            | At RES192SB001  | 2 in bgs  | 0-2"                   | TAL Metals, Mercury and SVOCs | Required by NYSDEC                        |
| OU1     | RES199   | -           | -               | -   | -         | -                      | -                             | No additional sampling required by NYSDEC |
| OU1     | RES217   | -           | -               | -   | -         | -                      | -                             | No additional sampling required by NYSDEC |
| OU5     | EA005    | Category D  | 1 SB            | East property line in back yard                             | 15 ft bgs | 0-2", 2-24" and native | TAL Metals, Mercury and SVOCs | Required by NYSDEC                        |
| OU1     | EA009    | Category D  | 1 SS            | Northwest property line                                     | 2 in bgs  | 0-2"                   | TAL Metals, Mercury and SVOCs | Required by NYSDEC                        |
| OU1     | EA023    | Category D  | 2 SB            | North and west of driveway                                  | 2 ft bgs  | 0-2" and 2-24"         | TAL Metals, Mercury and SVOCs | Required by NYSDEC                        |
| OU1     | EA049    | -           | -               | -   | -         | -                      | -                             | No additional sampling required by NYSDEC |
| OU5     | EA050    | Category D  | 1 SB            | East property line in back yard                             | 15 ft bgs | 0-2", 2-24" and native | TAL Metals, Mercury and SVOCs | Required by NYSDEC                        |
| OU1     | EA052    | Category D  | 1 SB            | North of driveway   | 2 ft bgs  | 0-2" and 2-24"         | TAL Metals, Mercury and SVOCs | Required by NYSDEC                        |
| OU1     | EA096    | =           | -               | -   | -         | -                      | -                             | No additional sampling required by NYSDEC |
| OU1     | EA110    | Category D  | 1 SS            | Southwest corner of property, west of driveway <sup>1</sup> | 2 in bgs  | 0-2"                   | TAL Metals, Mercury and SVOCs | Required by NYSDEC                        |

#### Notes

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<sup>&</sup>lt;sup>1</sup> This sample is required by NYSDEC if property corner is west of the driveway (to be determined prior to sampling)

#### NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

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

March 20, 2019

Mr. Michael Ford, P.E. Corning Incorporated HP-ME-03-83 Corning, New York 14831

Dear Mr. Ford:

Subject: Draft Study Area Pre-Design Investigation Work Plan Residential Areas (OU1, 2, and 5) Addendum 3, submitted February 22, 2019, Corning Study Area, Site ID No. 851046, City of Corning, Steuben County

The New York State Department of Environmental Conservation (NYSDEC), in consultation with the New York State Department of Health (NYSDOH), has reviewed the above-referenced Work Plan Addendum dated February 22, 2019. The Work Plan Addendum is hereby approved with the following clarifications.

Addendum 3 includes a list of 20 properties where the plan states, "no additional sampling required by NYSDEC." While the State makes a good faith effort to provide Corning Incorporated with early feedback and direction during WebEx presentations, we consider it inappropriate to make any final decisions based solely on WebEx presentations without the benefit of finalized data presented in spatial context. The State will stand by this early feedback provided the finalized information on the properties in question as well as data from adjacent properties support such a decision.

It is the Department's understanding based on discussions with Corning Incorporated's representatives that PDI Work Plan Addenda 1 and 2, approved on May 8, 2018 and October 10, 2018 respectively, have not yet been implemented. Additionally, the schedule provided with PDI Work Plan Addendum 3 lacks sufficient detail to determine when the work will begin or be completed. While the Department understands that Corning Incorporated must gain access to the properties to complete the work, every effort should be made to complete all remaining sampling during 2019. Please provide a detailed schedule by April 15, 2019.

Based on discussions with the State, Corning Incorporated submitted a set of design drawings for property EA-039. The proposed excavation does not, however, extend to sampling locations where SCOs were not exceeded. Please consider this approval to extend to additional sampling on property EA-039 to



define the limits of excavation. If Corning Incorporated chooses not to complete this additional sampling, additional excavation will be required.

The Department was not informed of the sampling completed under the PDI Work Plan during the week of December 17, 2018 until after the work was completed. As required by 6NYCRR Part 375-1.6, please ensure timely notification to the Department a minimum of seven days **prior** to the initiation of any field work in the Study Area.

Please provide a finalized version of the Work Plan Addendum for posting on the Department's public website. Please place the Addendum, along with this letter, in the local document repository. If you have any questions concerning this matter, please contact me at 585-226-5351 or via e-mail at <a href="kelly.cloyd@dec.ny.gov">kelly.cloyd@dec.ny.gov</a>.

Sincerely,

Kelly C. Cloyd, Ph.D. Engineering Geologist 2

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