

# **ADDENDUM NO. 1 - INTERIM REMEDIAL MEASURE WORK PLAN**

**Vine Street Water Treatment System**

**Prepared for:**

**Village of South Corning  
Steuben County, NY**

**Prepared by:**



**T&R Environmental  
691 Addison Rd  
Painted Post, NY 14870**

**Date: February 2, 2022**



## Finger Lakes EnviroTech LLC.

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### Professional Engineering Certification

I, Kyle Stone, am currently a registered professional engineer licensed by the State of New York. I certify, under penalty of law, that this document titled **Addendum No. 1 - Interim Remedial Measure Work Plan, Vine Street Water Treatment System, Village of South Corning, Steuben County, New York** and associated figures, tables, attachments, and/or appendices was prepared under my direct supervision or by myself in accordance with applicable regulations. The information contained within is, to the best of my knowledge and belief, true, accurate, and complete.

I, however, have not evaluated and do not certify aspects of this document that are outside my area of expertise (including, but not limited to, electrical, mechanical, and structural features).

I certify that all information and statements in this certification form are true. I understand that a false statement made herein is punishable as a Class "A" misdemeanor, pursuant to Section 210.45 of the Penal Law.



Kyle T. Stone, PE – License No. 104698

2/2/2022  
Date



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**February 2, 2022**

**Ms. Samantha Salotto, PE**

New York State Department of Environmental Conservation  
Division of Environmental Remediation  
625 Broadway  
Albany, NY 12233

**Re: Addendum No. 1 - Interim Remedial Measure Work Plan, Vine Street Water Treatment System, Village of South Corning, Steuben County, New York**

Ms. Salotto,

The below Addendum is presented to the New York State Department of Environmental Conservation (NYSDEC) by Finger Lakes Enviro-Tech, LLC. dba T&R Environmental on behalf of the Village of South Corning (the Village) for the Interim Remedial Measure Work being performed at 6 Vine Street in the Village of South Corning, New York (hereinafter referred to as the "Site"). This addendum is required, in part, due to a transition in the funding source of the project and subsequent requirements related to the company providing additional funding for the project. Corning Incorporated located at 1 Riverfront Plaza, Corning, New York (Corning Inc.) intends to assume financial responsibility for some of the costs associated with disposal of the waste generated from the Site via an Agreement reached with the Village on December 9, 2021. As such, the Agreement has imposed additional project requirements above what was previously proposed in the NYSDEC-approved Interim Remedial Measure Work Plan (IRM Work Plan) (approval received via email dated April 16, 2021) relating to waste disposal, tracking, and documentation in accordance with the Agreement. Further information regarding Site background, work completed to date, and proposed deviations from the NYSDEC-approved IRM Work Plan are presented below.

## **1.0 BACKGROUND**

T&R Environmental previously prepared the IRM Work Plan for Site excavation for construction of a new water treatment system building located at the Site. The IRM Work Plan was prepared on behalf of and at the request of the Village of South Corning.

The Site is located in a currently empty lot (prior to construction) owned by the Village, adjacent to property owned by the State of New York and New York State Flood Control for the Chemung River. The Village proposed excavation for the installation of foundation footers for a new building structure measuring 24 feet by 44 feet with adjacent ancillary piping to the rear of the building running to a nearby pumphouse. In addition, a 6,500-gallon backwash tank was installed underground at the front of the building, on the east side of the property. Upon the start of initial excavation work in November 2020 performed by others, unknown fill-type materials were encountered including glass shards, fire brick, wood, and various debris with unknown origins. Environmental work performed by T&R Environmental under contract to Streeter Associates, Inc. of Elmira, NY (Site General Contractor) was initiated on June 21, 2021 and work completed to date is described in further detail in the following section.

## 2.0 WORK COMPLETED TO DATE

Environmental work was initiated the week of June 21, 2021, with T&R Environmental's mobilization to the Site. Initial work consisted of a public utility stakeout, mobilization of equipment, portable restroom and job trailer, installation of Site security fence, truck and equipment decontamination area, and stockpile staging area. Excavation was initiated on June 24, 2021 and was substantially completed on August 2, 2021. Soils excavated to date have varied in concentrations of fill and are inconsistently located across the areal extent of the Site (i.e. pockets of fill material exist across the Site both in horizontal and vertical extent and appear to have no pattern relating to placement or location). Significant pockets of fill encountered to date containing waste glass, brick, miscellaneous municipal solid waste, and metal have been excavated beneath the eastern portion of the proposed water treatment building extending to the north and east towards the proposed utility piping and Existing Well #1 Building and along the entirety of the excavation of the backwash holding tank.

Excavated soils have been stockpiled in five separate soil stockpiles constructed in substantial compliance with the details provided in the IRM Work Plan. Two soil stockpiles contain glass and fill-impacted materials visually segregated during excavation activities. The remaining three stockpiles contain materials visually segregated during excavation to contain little to no fill materials and primarily consist of "native" soils made up of light brown loam with varying concentrations of silt and sand. No soils have exhibited volatile organic compound (VOC) concentrations in exceedance of background concentrations via photoionization detector (PID) screening.

Stockpiles were sampled on August 3, 2021 and analyzed for the initial analyte list as proposed within the Work Plan. Of the five stockpiles sampled, two stockpiles exceeded the NYS hazardous waste threshold for heavy metals. These stockpiles correlated with the stockpiles visually noted to contain glass and industrial fill. Toxicity characteristic leaching procedure (TCLP) lead concentration from stockpiles one and three were 45.7 milligrams per liter (mg/L; equivalent to parts per million [ppm]) and 15.2 mg/L, respectively. Stockpile three also exhibited a barium concentration in excess of the hazardous threshold at 313 mg/L. A duplicate soil sample collected from stockpile one also exhibited lead and barium concentration in excess of hazardous waste thresholds. At present, approximately 885 cubic yards of soil have been generated as part of the environmental work. Of this, an estimated 654 tons of soil exhibits hazardous characteristics and will require off-site disposal as hazardous waste. No further soil is expected to be generated as part of the environmental work for the project.

Soils at the Site remain stockpiled on and covered by poly sheeting. Following completion of excavation work, T&R installed a geotextile demarcation layer and an imported stone cap of varying depths depending on planned future Site cover as prescribed within the Work Plan. The Site has been returned to the general contractor who, at the time of writing, continues to build the superstructure for the future water treatment building at the Site. Environmental work at the Site remaining includes the off-site disposal of hazardous waste generated during excavation activities.

## 3.0 PROPOSED ALTERATIONS TO THE IRM WORK PLAN

The following subsections provide details pertaining to the proposed revisions to the NYSDEC-approved IRM Work Plan.

### On-Site Stabilization, Sampling, and Disposal

As was previously anticipated, soils determined to be characteristically hazardous for heavy metals by TCLP were to be stabilized on-site utilizing Blastox® or equivalent soil stabilization reagent. It was anticipated that the glass and brick-impacted fill materials would exhibit TCLP metals concentrations (specifically lead and chromium) in excess of applicable federal and state hazardous waste thresholds. This assumption was based on previously conducted soil characterization samples collected by T&R Environmental and described in detail in Section 1.1 of the IRM Work Plan. The purpose and intent of the on-site stabilization and subsequent TCLP and Multiple Extraction Method (MEM) sampling proposed within the IRM Work Plan was to render the waste non-hazardous on-site (as determined by sampling performed following stabilization reagent application) and allow for disposal off-site as a non-hazardous waste at a Resource Conservation and Recovery Act (RCRA) Subtitle D facility such as a local municipal landfill.

However, in accordance with the Agreement, Corning Inc. has requested that on-site stabilization of potentially hazardous waste (glass and brick-impacted fill) generated during excavation activities not be performed but, rather, the material be disposed of off-site as hazardous waste at a RCRA Subtitle C facility.

Currently, the ultimate RCRA Subtitle C disposal facility for the glass and brick-impacted fill material is not finalized but is anticipated to be US Ecology, located in Canton, Ohio. The disposal facility will be permitted with the applicable regulatory agencies (federal, state, and local where applicable) to accept hazardous waste. The Village of South Corning will also now be required to apply for and receive a United States Environmental Protection Agency (USEPA) hazardous waste generator identification prior to off-site shipment of hazardous waste. The Village will have received the generator identification number prior to any off-site shipment of hazardous waste. Waste will be hauled by a transportation firm permitted to haul hazardous waste in each state along the travel path from the Site to the ultimate disposal facility.


The above proposed changes alter IRM Work Plan Sections 2.6.1.2 and 2.7.1 which are no longer pertinent as on-soil stabilization is no longer proposed. All other sections of the IRM Work Plan remain unchanged. Based on the requested changes to the IRM Work Plan included in this Addendum, it is anticipated that work will be extended until February/April 2022 when hazardous waste disposal and restoration activities at the Site are expected to be completed.

## 4.0 CONCLUSIONS

The Village of South Corning and T&R Environmental respectfully request NYSDECs expedited review and approval of Addendum No. 1 to the IRM Work Plan as to not detrimentally affect the schedule of the ongoing project. We look forward to hearing NYSDECs responses.

Should you have any questions, please feel free to contact me at the information below.

Respectfully,  
T&R Environmental



**Kyle Stone, PE**

Director of Environmental Remediation and Professional Services

**Finger Lakes EnviroTech, LLC**

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