



Off-Site Decommissioning Work Plan

110 Luther Avenue BCP Site
Site #C734118
110 Luther Avenue, Town of Salina,
Onondaga County, New York

Syracuse Label Company, Inc.

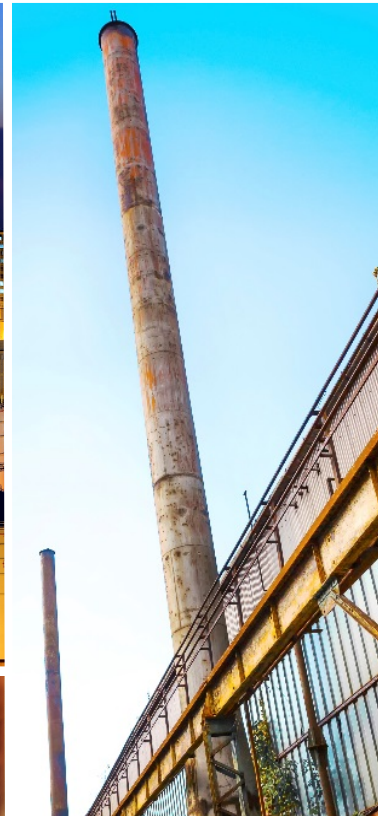




Table of Contents

1.	Introduction.....	1
2.	Proposed Monitoring Well Decommissioning	2
2.1	Decommissioning of Off-Site Groundwater Monitoring Wells.....	2
2.2	Decommissioning of Off-Site Soil Vapor Monitoring Wells.....	3
2.3	Decommissioning Report.....	3
2.4	Site Management Plan Revisions	3

Figure Index

Figure 1	Site Layout and Proposed Modifications
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1. Introduction

Syracuse Label Company, Inc. (Syracuse Label) entered into a Brownfield Cleanup Agreement (BCA, Index #B7-0811-09-08) with the New York State Department of Environmental Conservation (NYSDEC) to characterize the nature and extent of contamination at the 110 Luther Avenue Brownfield Cleanup Program Site (the Site, Figure 1) and to complete applicable remedial actions. Investigations conducted on-Site determined that groundwater contamination, consisting of chlorinated volatile organic solvents, existed in a discrete area located in the eastern/central portion of the Site.

The groundwater remedy for the Site included in-situ chemical reduction (ISCR), which consisted of injection of approximately 11,100 pounds of granular carbon and zero valent iron powder mixed into a slurry with potable water and injection of approximately 12 liters of bacterial consortium (Dehalococcoides). The remedial injections occurred between February 2011 (pilot test) and July 2011 (full scale injection) and quarterly groundwater monitoring at Site monitoring wells was completed afterwards to monitor the effectiveness. On December 22, 2011 the NYSDEC issued a Certificate of Completion (COC) which included provisions for implementing a Site Management Plan (SMP). The SMP includes requirements for on-going groundwater monitoring at locations on-Site and off-site.

Based on a review of quarterly groundwater monitoring results compiled after issuance of the Certificate of Completion, and discussions with the NYSDEC, Syracuse Label implemented corrective measures to address elevated concentrations of degradation byproducts identified in samples taken from specific Site groundwater monitoring wells. The corrective measures included ISCR, which consisted of injection of a total of approximately 25,500 pounds of granular carbon and zero valent iron powder mixed into a slurry with potable water and injection of approximately 58.5 liters of bacterial consortium (Dehalococcoides). The corrective measures were completed in four discrete areas of the Site between December 2012 and February 2014 and quarterly groundwater monitoring was completed through 2016 to monitor the effectiveness.

Groundwater monitoring data obtained following implementation of corrective measures indicated that the activities were effective at further reducing the concentrations of target compounds in Site groundwater. As a result, following completion of September 2016 groundwater monitoring activities Syracuse Label requested, and the NYSDEC approved, a reduction in groundwater monitoring frequency from quarterly to semi-annual (MW-1, MW-7, MW-8, MW-12, MW-13, and MW-18) and annual (MW-10, MW-11, and MW-19) and a reduction in the sample analytical list to include only chlorinated volatile organic compounds (VOCs) of concern. It was agreed that the reductions would take effect in 2017 and sampling would occur in May and November of each year. In addition, Syracuse Label requested, and the NYSDEC approved, the decommissioning of groundwater monitoring wells MW-2, MW-3, MW-4, MW-5, MW-14, MW-15, and MW-16 and soil vapor monitoring wells SVW-1 and SVW-2, which was completed in December 2016.



Semi-annual groundwater monitoring for only chlorinated VOCs of concern commenced in May 2017 at groundwater monitoring wells MW-1, MW-7, MW-8, MW-10, and MW-18, with only field parameters and water levels recorded at MW-19 during each event.

The Site and surrounding area is serviced by a public municipal water supply and the Site's Environmental Easement restricts the use of on-Site groundwater for any purpose. Also, a soil cover engineering control is in place across the Site to preclude potential exposure to impacted soils, if any, and a sub-slab depressurization system (SSDS) is operated in the building to preclude potential exposure to vapors via soil vapor intrusion.

During 2020 the adjacent business, UniFirst, acquired the properties to the south of Luther Avenue and initiated development of the adjacent properties to accommodate an expansion of their existing facility and construction of paved parking lots. The commercial structures that were present on the adjacent properties were demolished and UniFirst began preparing the area for the planned paved parking lots. The planned parking lots are located such that the off-Site monitoring points will be impacted by the construction. Additional information on the proposed development can be obtained from previous reports submitted to the NYSDEC.

2. Proposed Monitoring Well Decommissioning

Based on a review of semi-annual groundwater monitoring results between May 2017 and May 2020 as well as observations of recent and future planned activities occurring on the adjacent properties, Syracuse Label requested the decommissioning of off-site groundwater and soil vapor monitoring wells in a July 2020 letter to NYSDEC. The proposed activities included decommissioning off-site soil vapor monitoring wells SVW-3 and SVW-4 and off-site groundwater monitoring wells MW-18 and MW-19. The NYSDEC approved the decommissioning request (August 25, 2020), with the exception that MW-18 would need to be maintained for future monitoring and the requirement that a Work Plan be submitted to NYSDEC for review and approval. The following Work Plan outlines the proposed approach for decommissioning the off-site monitoring wells.

2.1 Decommissioning of Off-Site Groundwater Monitoring Wells

Decommissioning of off-site groundwater monitoring well MW-19 is proposed to occur following the casing pulling methods outlined in the NYSDEC's Groundwater Monitoring Well Decommissioning Policy (CP-43, November 2009). The bottom of the well will be punctured, a cement and bentonite grout mixture will be added to the well, the PVC well screen and riser will be removed, and more cement and bentonite grout mixture will be added to the void to bring it to ground surface. The concrete pad and flush mount curb box surface casing will also be removed and the area will be left similar to surrounding conditions. All well materials will be removed from the Site for disposal off-site as solid waste. Following decommissioning, the area will likely be further modified as part of the on-going development of the adjacent properties.



Groundwater monitoring well MW-18 will not be decommissioned at this time; however, the monitoring well will require modification to ensure its continued functionality and to accommodate proposed development activities. The modifications to the monitoring well will include placing a new heavy duty flush mount curb box and concrete pad at the well location and matching its surface to surrounding finished grades. Since the new curb box and concrete pad will need to tie into the final grades in the area, the well modifications will not proceed until the paved parking lot construction is completed, which is anticipated to be in spring or summer of 2021. It is not anticipated that the PVC riser of the well will need to be modified to accommodate new grades; however, if it is determined that this is necessary as a survey of the top of the PVC riser will be performed and the updated information will be provided to NYSDEC.

2.2 Decommissioning of Off-Site Soil Vapor Monitoring Wells

Decommissioning of off-site soil vapor monitoring wells SVW-3 and SVW-4 will also occur, as approved by NYSDEC.

The flush mount cover at SVW-3 was destroyed by others during demolition of the building in its vicinity. A visual observation performed by GHD personnel did not identify remaining well tubing. A closer investigation will be performed to attempt to locate the soil vapor well tubing, and if found, the tubing will be pulled until the point that it breaks.

The tubing for SVW-4 will be decommissioned by pulling until the point that it breaks. The flush mount surface casing curb box and concrete pad will be removed and the area will be left similar to surrounding conditions. All well materials removed will be disposed off-site as solid waste.

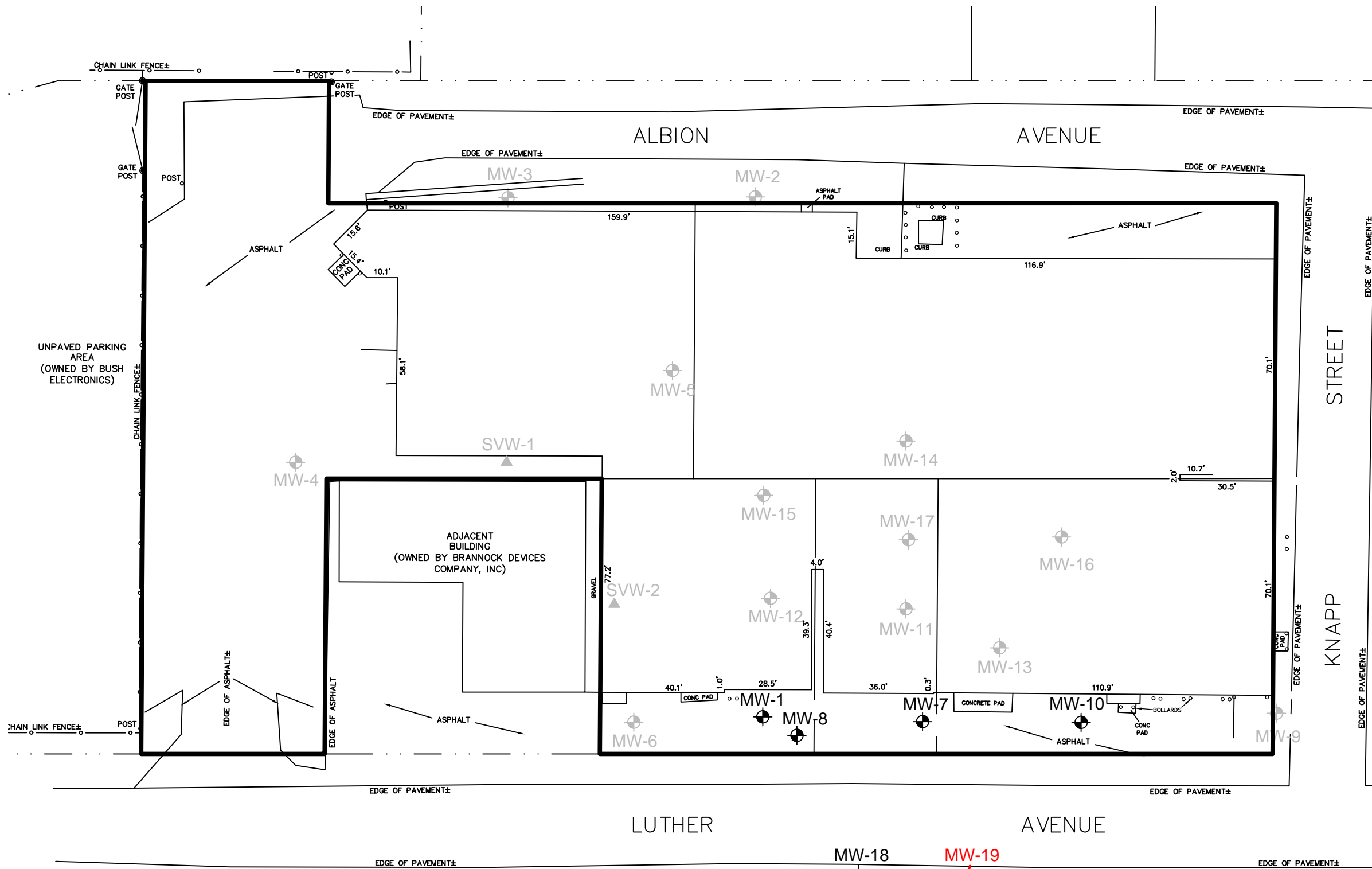
2.3 Decommissioning Report

Following completion of decommissioning activities, a documentation report will be prepared. The documentation report will include a description of decommissioning activities performed as well as representative photographs of the work. If necessary, the surveyed MW-18 PVC riser elevation will be included. A copy of the report will be submitted to NYSDEC and NYSDOH for their records.








2.4 Site Management Plan Revisions

Following completion of decommissioning activities, the Site Management Plan for the Site will be revised to document the modifications. The revised copy of the SMP will be submitted to NYSDEC and NYSDOH for review and approval.

Attachment



LEGEND:

-  **MW-1** GROUNDWATER MONITORING WELL LOCATION AND ID (SURVEYED)
-  **SVW-3** SOIL VAPOR MONITORING WELL LOCATION AND ID TO BE DECOMMISSIONED (SURVEYED)
-  **MW-6** GROUNDWATER MONITORING WELL LOCATION AND ID TO BE DECOMMISSIONED (SURVEYED)
-  **MW-2** GROUNDWATER MONITORING WELL LOCATION AND ID DECOMMISSIONED DECEMBER 2016 OR MARCH 2019 (SURVEYED)
-  **SVW-1** SOIL VAPOR MONITORING WELL LOCATION AND ID DECOMMISSIONED DECEMBER 2016 (SURVEYED)
-  BCP SITE BOUNDARY (APPROXIMATE)
-  PROPERTY BOUNDARY (APPROXIMATE)

NOTES:

1. REMAINING GROUNDWATER MONITORING WELLS (MW-1, MW-7, MW-8, MW-10, AND MW-18) TO BE SAMPLED SEMI-ANNUALLY FOR POINT OF COMPLIANCE MONITORING PURPOSES.
2. SAMPLES WILL BE ANALYZED FOR CHLORINATED VOCs OF CONCERN ONLY (PCE, TCE, cis-DCE, trans-DCE, AND VC).
3. SAMPLING WILL CONTINUE AT THIS FREQUENCY UNTIL APPROVAL FOR ADDITIONAL MODIFICATIONS IS RECEIVED FROM NYSDEC.



NOTES:
1. SITE FEATURES BASED ON SITE SURVEY BY IANUZI & ROMANS, P.C. MARCH 2010 AND NOVEMBER 2010.



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110 Luther Avenue BCP Site (Site #C734118)
**Site Layout and
Proposed Modifications**

Job Number | 86-14941
Revision | A
Date | 09.03.2020

Figure 1



about GHD

GHD is one of the world's leading professional services companies operating in the global markets of water, energy and resources, environment, property and buildings, and transportation. We provide engineering, environmental, and construction services to private and public sector clients.

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