



13 May 2013
File No. 70665-018

New York State Department of Environmental Conservation
Division of Environmental Remediation, Region 8
6274 East Avon-Lima Road
Rochester, NY 14414

Attention: Mr. Frank Sowers, P.E.

Subject: **Corrective Measures Plan**
2012 Site Management Periodic Review
CooperVision VCA#V00175
711 North Street
Scottsville, New York

Dear Mr. Sowers:

This letter serves as the Corrective Measures Plan (CMP) requested in your letter dated 16 April 2013. This CMP is to formally address the items relating to the non-compliance of the Site Management Plan (SMP). After New York State Department of Environmental Conservation (NYSDEC) approval of this CMP, the 2012 Periodic Review Report (PRR) and Institutional Control/Engineering Control Certification (Certification) will be revised for the above-referenced Site.

Required Corrective Measures

The 2012 PRR had inaccurately reported the monitoring completed for the sub slab depressurization (SSD) system. There had been renovations to limited portions of the CooperVision facility that had inadvertently made a few of the test points inaccessible. The fan readings for subslab vacuum locations near the inaccessible points were all in normal operation range at the time of monitoring, and combined with the consistency with other sub slab test point readings, we viewed the system to be performing as intended during the period of the PRR submitted, and therefore all 17 readings were not necessary to support that conclusion. After review of the PRR and Site Management Plan (SMP), NYSDEC determined that all originally-identified monitoring points must be maintained. Therefore, this CMP addresses the following issues:

- Inaccessible test points had been covered over by materials used during limited renovation of the facility.
- The SMP was interpreted inaccurately in regards to collecting all seventeen readings.

As of this letter, the building elements that had blocked access to some of the monitoring points have now been modified to make all test points accessible. A complete set of readings was obtained in April 2013 and is included in this CMP. The specific actions taken are described below:

- The two test points (T-11 and T-13) in the new HR office had been covered over by new carpeting in the past year. The carpeting was removed so the test points are accessible for the future monitoring.
- The two test points (T-1 and T-18) are located in the cafeteria and had been monitored in April 2012, but not in October 2012, due to new flooring and installed cabinets. The flooring was removed and the cabinet was modified so the test points are accessible for future monitoring.
- Test point T-4 in the coat room was inadvertently covered by an exhaust duct for the server room adjacent to the coat room. An access door was installed in the duct so the test point is accessible for future monitoring.
- It is understood that all seventeen test points are to remain accessible and are required to be monitored annually every year that the SMP remains in effect.

Future Corrective Measures

In the future, if problems arise during the semi-annual groundwater sampling or the annual engineering control inspection that may compromise ability to complete the testing as stated in the SMP and this CMP, the NYSDEC project manager will be informed so as to resolve the problem.

We hope that the NYSDEC finds this CMP sufficient to address the issues raised in its 16 April letter regarding the PRR. Upon the NYSDEC's approval, we will proceed in revising and re-submitting the 2012 PRR. Should you have any questions or concerns regarding this Corrective Measures Work Plan, please do not hesitate to contact us.

Sincerely yours,
HALEY & ALDRICH OF NEW YORK



Mark N. Ramsdell, P.E.
Senior Construction Project Manager



Vincent B. Dick
Senior Vice President

Enclosures

c: CooperVision; Chuck Rogers
CooperVision; Bernard Hallatt
BakerHostetler; Christopher H. Marraro, Esq.

Table V
Annual SSD System Monitoring

Location (Site/Facility Name): CooperVision
 Location (Address): Scottsville, NY
 Client: CooperVision

Date: week of: 22 April 2013
 Performed By: M. Ramsdell
 Job Number: 70665-018

Test Point	10/14/2011 Vacuum Reading ("WC)	4/12/2012 Vacuum Reading ("WC)	10/18/2012 Vacuum Reading ("WC)	4/22-4/25/2013 Vacuum Reading ("WC)
T-1	0.022	0.020	Covered by Cupboards	0.021
T-2	*	*	*	*
T-3	0.654	0.655	0.392	0.446
T-4	0.033	0.018	covered by ventilation box	0.042
T-5	0.062	0.055	0.067	0.045
T-6	0.076	0.071	0.080	0.057
T-7**	-0.027	-0.024	0.007	0.007
T-8	0.007	0.002	0.031	0.028
T-9***	-0.018	-0.014	0.013	0.026
T-10	0.020	0.019	0.022	0.027
T-11	0.980	covered by carpet	covered by carpet	0.402
T-12	0.025	0.018	0.015	0.011
T-13	0.008	covered by carpet	covered by carpet	0.009
T-14	0.011	0.015	0.010	0.014
T-15	0.032	0.028	0.030	0.029
T-16	0.024	0.019	0.023	0.021
T-17	0.015	0.023	0.018	0.019
T-18	0.004	0.011	blocked by vending machines	0.040

Suction Point	10/14/2011 Vacuum Reading ("WC)	4/12/2012 Vacuum Reading ("WC)	10/18/2012 Vacuum Reading ("WC)	4/22-4/25/2013 Vacuum Reading ("WC)
S-1	3.80	3.90	3.80	3.80
S-2	3.50	3.70	3.70	3.70
S-3	1.60	2.60	2.70	1.60
S-4/5	2.30	3.20	2.40	2.40
S-6	3.50	3.60	3.60	3.60
S-7	1.60	1.60	1.70	1.70

* T-2 is not a valid test point
 ** with exterior doors closed
 *** with interior doors open

Visual Inspection of System: * The Bio Lab has been converted into the Human Resources Director's Office, and has been covered with wall-to-wall carpet. Carpet was removed to access points. * Cafeteria (T-1 and T-18) was renovated, but points were made accessible. * Injection Molding Room (T-9) and Switchgear Room (T-7) are under considerable negative pressure and when doors are open, vacuum is achieved in the subslab.
Recommendation Actions: None
Description of Past Year Activities: