Introduction

The New York State Departments of Environmental Conservation (DEC) and Health (DOH) are continuing to strictly oversee the ongoing investigation and cleanup activities at the Elmira High School (EHS) property. This oversight will ensure a comprehensive and careful cleanup that is protective of public health and the environment. The agencies are also committed to keeping the Elmira community informed regarding the cleanup progress. Our top priority is ensuring that students, faculty, staff, and visitors will not be exposed to below-ground contamination. Unisys Corporation, the corporate successor of the Remington Rand company, is committed under its legal agreement with New York State to fully investigate and implement a comprehensive cleanup of the site and any impacted off-site areas, consistent with the requirements of the State’s Brownfield Cleanup Program (BCP).

The purpose of this newsletter is to provide the community an update on recently completed activities and upcoming investigation and cleanup activities at EHS (#c808022), and two adjacent projects, the Former Sperry Remington Site (#808043), and Former Scott Technologies Site (#808049).

Concurrent with the comprehensive cleanup activities at EHS, the Elmira City School District (ECSD) has started construction activities related to a new athletic complex, including a new turf field, track, bleachers, scoreboards, bathrooms, and sound system.

COVID-19: Completing Essential Work Safely

Under New York State Executive Order 202.6, DEC has deemed the remedial work occurring at EHS and surrounding sites as essential during the ongoing COVID-19 response. The remedial investigation, interim remedial measures, and maintenance of current controls to prevent exposures are essential for the protection of public health and the environment. All New York State employees, on-site contractors, and personnel associated with the remedial efforts at these sites will continue to comply with New York State COVID-19 regulations, and with EHS COVID-19 procedures, as appropriate.
A site-specific COVID-19 Health and Safety Plan has been developed, approved by DEC and DOH, and addresses best work practices to be implemented on the job sites to prevent the spread of COVID-19. This plan is updated as new and additional information and guidance become available.

**Project Webpage and Enhanced Community Liaison Plan**

In September 2020, Unisys developed an Enhanced Community Liaison Plan (ECLP) as a roadmap to the available resources regarding the EHS property and project activities. This plan can be found on the DEC project webpage at:


The ECLP requirements overlay active IRM work plan activities while EHS classes and activities are in session. The ECLP summarizes additional actions related to working safely at EHS, including coordination, site access limitations, safety and security, noise monitoring, and a code of conduct for site workers.

**Interim Remedial Measures #4, #4 Amendment, and #5 Construction**

During Summer 2020, Unisys completed Interim Remedial Measure (IRM) #4, adjacent to the north and west side of the locker rooms at EHS. An estimated 6,500 cubic yards (approximately 12,300 tons) of soil were excavated and disposed of off-site at approved facilities or re-used as backfill where the soil meets cleanup standards.

In September 2020, Unisys began IRM #4 Amendment (IRM #4A), an expansion of IRM #4. IRM #4A removed below-ground contaminated soil located north of the area of IRM #4 (see Figure 1) and facilitated the transition between IRM #4 and IRM #5 work.

Unisys completed IRM #4A in April 2021. An estimated 9,962 cubic yards (approximately 18,900 tons) of soil were excavated and disposed of off-site at approved facilities or re-used as backfill where the soil meets cleanup standards. The restoration of the backfilled area for IRM #4A is ongoing in coordination with ECSD including the district’s work on the new stadium complex.

In December 2020, Unisys began IRM #5, a continuation to the north from the IRM #4 and #4A area, which encompasses the track and football field. The remedial work utilizes much of the same construction infrastructure (e.g., materials storage area, haul road) and excavation to remove soils impacted by PCBs and metals.
To date, an estimated 32,400 cubic yards of soil associated with IRM #5 have been excavated and disposed of off-site at approved facilities or re-used as backfill where the soil meets cleanup standards.

Table 1: IRMs by the Numbers

<table>
<thead>
<tr>
<th></th>
<th>IRM #4 (June to August 2020)</th>
<th>IRM #4A (September 2020 to April 2021)</th>
<th>IRM #5 (December 2020 to Present)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Soil Excavated</td>
<td>6,500 cubic yards</td>
<td>9,962 cubic yards</td>
<td>32,400 cubic yards</td>
</tr>
<tr>
<td>Disposed Off-Site as Hazardous Waste</td>
<td>4,079 tons</td>
<td>9,064 tons</td>
<td>20,721 tons</td>
</tr>
<tr>
<td>Disposed Off-Site as Non-Hazardous Waste</td>
<td>3,977 tons</td>
<td>3,686 tons</td>
<td>21,094 tons</td>
</tr>
<tr>
<td>Soil Reused as Backfill</td>
<td>1,987 tons</td>
<td>1,200 tons</td>
<td>~18,000 tons</td>
</tr>
<tr>
<td>Fill Imported for Backfill and Soil Cover</td>
<td>7,993 tons</td>
<td>5,958 tons</td>
<td>In process</td>
</tr>
</tbody>
</table>

Note: Excavation measurements are cubic yards and disposal is measured as tons. For this Site, the conversion is 1 cubic yard = 1.9 ton

IRM #5 Excavation and disposal numbers – through mid-May 2021

The work areas identified in the figure below including excavation area, haul road, and material storage area are not accessible to the public for safety reasons. Traffic controls, including flagmen and traffic control devices such as cones, signs, and barriers, are used to ensure safe access for students and school personnel to and from the EHS property. IRM-related truck traffic to and from the project site does not occur during scheduled student arrival and release times and is carefully coordinated with ECSD for other events. The restoration of the backfilled area will be coordinated with ECSD, including the district’s work on the new stadium complex.

DEC and DOH require a Community Air Monitoring Plan (CAMP) to measure airborne particulate matter. Dust concentrations are continuously monitored during remediation and construction activities. Airborne PCB vapors are monitored when remediation activities are occurring in soil with PCB concentrations known or suspected to be greater than 50 mg/kg. Dust control measures (e.g., watering) are implemented to reduce dust on temporary dirt roadways and open excavations. If air monitors detect dust above action levels, work is stopped until corrective measures are implemented to ensure public health and the environment are protected.

Trucks are covered to properly secure all material during transport. Trucks and equipment are decontaminated prior to leaving the site and truck traffic patterns have been designed to maintain safety on local roadways.

IRM #5 Amendment 1 provided additional remedial construction details related to the removal of the former industrial sewer along the eastern property line and ground preparation for stadium related subsurface utilities.

The activities completed as part of IRM #4, IRM #4A, and IRM #5 will be summarized in a construction completion report (CCR).
Elmira High School Stadium Restoration

ECSD is coordinating the construction of the new stadium and athletic complex in phases as cleanup work is completed by Unisys.

Image 3: Architectural Rendering - Elmira High School Athletic Complex
Next Steps:
Interim Remedial Measure #5 Amendment 2 North Athletic Field (NAF)

Cleanup plans are being prepared to implement IRM #5 Amendment 2 starting in Spring 2021. Contaminated soil will be removed in the Northern Athletic Fields (NAF) and an area north of the tennis courts as part of the remedial work. Excavated material will be transferred to the material storage area over temporary haul roads, prepared for disposal or tested for re-use, and then loaded into clean, covered trucks for disposal as warranted. Construction operations will continue to exit to Main Street until a new access can be established on the north end of the property. Portions of the NAF are currently being used for temporary facilities for IRM construction, including stockpile areas and temporary haul roads.

In the deepest NAF excavation, soil removal will extend to the water table approximately 16 feet below ground surface. For impacted groundwater and soil below the water table, it is anticipated that institutional and engineering controls like groundwater use restrictions, monitoring, and clean cover systems will be proposed in the final site remedy.

Comprehensive Remedial Investigation

Between 2015 and 2021, Unisys completed soil sampling to depths of 16 feet below ground to the approximate depth of groundwater across the majority of the EHS site. The remedial investigation activities have informed the previously completed and ongoing IRM actions. The remedial investigation is ongoing for the remainder of the site. In August 2020, initial soil sampling was conducted to determine the extent of potentially impacted soil off-site, east of the former visitor grandstand at the football field. In addition, an assessment of potential impacts from an on-site industrial storm sewer was completed and a soil investigation below the groundwater table began in early 2021.

Additional delineation and characterization of soil impacts is planned for the NAF (Spring 2021), east of
the gymnasium (Summer 2021), and areas requiring further evaluation to support future on-site cleanup plans. Comprehensive site-wide groundwater investigations are ongoing in the NAF and the football field and is planned for the east of the gymnasium site area. Work is also planned to assess the attenuation or shrinking of the groundwater concentrations extending east of the site toward the railroad tracks. DEC and DOH completed extensive study of these plumes in 2007 and found no adverse risk to the public.

**Interim Site Management Plan**

DEC and DOH have approved the Interim Site Management Plan (ISMP) as developed by Unisys for the EHS property. The ISMP monitors and maintains the engineering controls, including cover system barriers (e.g., concrete floors, pavement, mulch beds, clean, and vegetated soil) and sub-slab depressurization systems (SSDS). The existing and newly constructed cover system reduces the potential of exposure to below-ground contamination or remaining impacts. The ISMP includes measures to monitor and maintain the SSDS that is installed in portions of the EHS building. The SSDS is operating continuously and prevents potentially impacted vapors from entering the indoor area.

ISMP monitoring and inspections are conducted quarterly, with the most recent event being completed in April 2021, including indoor air sampling. If deficiencies in these engineering controls are found, actions will be taken to quickly address these deficiencies. Monitoring, inspection, and indoor air sampling events have consistently shown the SSDS are preventing potentially impacted vapors from entering the EHS building.

DEC requires advanced notification of all construction and maintenance work below protective soil cover. This work must be planned and completed in accordance with the Excavation Work Plan portion of the ISMP to ensure the protection of public health and the environment. DEC has received appropriate notification of ECSD athletic complex and field restoration construction activities and has authorized work to proceed.

**Coldbrook Creek Sampling**

Unisys identified the downstream extent of impacted sediments in Coldbrook Creek and is investigating the extent of impacted soils along the creek banks and in the flood zone. Phase II of this investigation was implemented in July and August 2020 and included soil samples from 32 parcels along Coldbrook Creek. A summary of the Phase II sampling results is anticipated to be mailed to the property owners in June 2021. In Phase III, additional soil samples will be collected to further delineate constituents of concern at several previously sampled locations and investigate potential constituents of concern at a remaining unsampled parcel. Phase III will be implemented in Summer 2021.

Step IIC of the Fish and Wildlife Impact Analysis was completed in July and August 2020. Step IIC included collection and testing of sediment and fish tissue, and a benthic community survey. A summary of the Fish and Wildlife Impact Analysis is anticipated to be mailed to the property owners in the Summer of 2021.
Cleanup of Oil-Water Separator #2 (IRM - Site #808043)

In late 2019 and summer 2020, approved IRM activities for the Oil-Water Separator (OS2) on the Southern Tier Commerce Center (STCC) were completed. This work includes installation of new storm water bypass, the excavation and disposal of surrounding soils and contents of OS2, and sealing the outlet from OS2 to the drainage culvert that discharges to the wetland area that drains to Coldbrook Creek. Unanticipated high groundwater precluded the planned removal of the concrete structure. The area is currently secured with fencing to deter access and prevent exposures to impacted material while other removal or closure alternatives are being evaluated.
Department of Health Outreach

DOH works with the ECSD and the local community to learn about health concerns of current and former EHS staff. During recent public events and meetings, members of the school community and other stakeholders expressed concern with possible health related impacts associated with contaminants present on the school grounds. DOH worked with a survey work group of EHS representatives to address these concerns. The survey workgroup played a key role in creating and distributing a health outcome survey that was provided to 330 current and former EHS staff in November 2019. Information about the survey was also shared with the larger community via email, social media, and traditional media. Survey responses were received by DOH via a Survey Monkey online application, by mail, email, and telephone through the end of December 2019. The results of the survey have been reviewed and are being summarized to share with the community at a later date. Due to the DOH COVID-19 response, the presentation of the survey results has been delayed. The DOH is committed to working with the survey workgroup to further assess the responses and provide the community with a comprehensive summary.

Public Communications

The project involves a variety of stakeholders; up to date information and open lines of communication are available to the public. Enhanced communications have been added to the DEC webpage https://www.dec.ny.gov/chemical/102390.html including:

- Updated Frequently Asked Questions.
- Project Hotline: To allow the public to submit inquiries 24 hours a day to the project team.
- IRM Information: Up to date IRM construction, monitoring, and health and safety information.

SIGN UP TO STAY INFORMED

https://www.dec.ny.gov/chemical/61092.html

WHERE TO FIND INFORMATION

Project documents are at these location(s):

Steele Memorial Library 101 East Church Street Elmira, NY 14901 (607) 733-9175

Region 8 NYSDEC Headquarters 6274 East Avon Lima Road Avon, NY 14414 (585) 226-5324 (call for an appointment)

While repositories may be closed due to COVID-19 response, project documents are also available on the NYSDEC website at: https://www.dec.ny.gov/chemical/37556.html or by contacting the Project Manager, Tim Schneider at timothy.schneider@dec.ny.gov