Frequently Asked Questions

Former Sperry Remington Property - North Portion
Brownfield Cleanup Program (BCP) Site #C808022

Overview

**What measures are in place to protect people from contact with contamination at Elmira High School?**

New York State remains committed to overseeing a careful and thorough cleanup of the Elmira High School (EHS) property, and our top priority is always ensuring that students, faculty and visitors are not coming in contact with any of the contamination found below ground on the site. Currently, while subsurface soil, groundwater and soil vapor contamination exist at the property, any potential exposure pathways where someone could encounter the contamination have been appropriately addressed:

- contaminated soil is below the ground's surface and cover systems (vegetated soil, wood chips, paving and building foundations);
- groundwater is not used for drinking water or other purposes at the school;
- the building’s sub-slab depressurization systems (SSDS) are effectively operated in a manner intended to ensure that contaminants beneath the building are not drawn into the school and affecting the indoor air quality, and operation of the building’s heating, ventilation and air-conditioning system further mitigates the potential for soil vapor intrusion; and
- air quality at the school has been extensively tested and is shown to be consistently below NYS Department of Health air guideline values.

**Why is the site cleanup taking so long?**

A comprehensive environmental investigation to prepare for the cleanup of the EHS property is on-going. Along with the additional investigation sampling necessary to fully identify all areas of below ground contamination that must be cleaned up, targeted PCB soil removal measures are being conducted ahead of other EHS capital improvement projects at the school. All cleanup and investigation work is being conducted by Unisys with strict DEC and DOH oversight.

Priority actions are those that mitigate the risk of exposure to environmental contaminants at EHS. In 2017, Unisys removed an area of shallow subsurface soils with slightly elevated levels of PCBs from a portion of the track infield and backfilled the area with clean soils. Additional PCB cleanup actions are planned for other portions of the EHS site between June and September 2018. In addition to this year’s targeted PCB cleanup, DEC has requested Unisys expedite comprehensive investigations on the athletic field area to delineate the nature and extent of the contamination below ground and guide the design of the cleanup for this portion of the site. DEC and DOH will continue to keep the public informed as this work progresses and as development of cleanup plans are finalized.

The CAMP monitoring/dust controls, truck covers/ washing, equipment decontamination, traffic controls on Main Street, and excavated soil is kept covered prior to proper disposal. It is imperative that this cleanup be done thoroughly and correctly, and that is why we continue to carefully plan and implement all remediation efforts on the site.
What is Unisys’s role?

Unisys is the corporate successor to Remington Rand and therefore a responsible party having liability to complete the investigation and cleanup of the site. In 2014, Unisys entered into an Order on Consent with the State to conduct a site characterization of the school property. In 2017, Unisys entered into an agreement under the State’s BCP to complete the comprehensive environmental investigation and cleanup at the Elmira High School (EHS) property.

In the past we were told that the school grounds were clean, what changed?

Prior to Unisys’ active involvement at the EHS site, recognized below ground contamination was appropriately managed by the ESCD in accordance with the Environmental Management Plan. In 2013, additional information related to past operations of the Remington Rand plant came to the attention of the DEC which prompted additional investigation work. Subsequently, discrete Areas of Concern were identified on the EHS property and a comprehensive environmental investigation began. Along with the additional investigation sampling, PCB soil removal measures are being conducted ahead of other EHS capital improvement projects. This multi-year investigation effort is expected to extend into 2019. Work is being conducted by Unisys with strict DEC and DOH oversight.

Why hasn’t the site been designated as a Class 1 clean-up project?

Unisys is a participant under their Brownfield Cleanup Agreement and is responsible for completing a full investigation and remediation of the site. A classification under Superfund is not applicable to the Brownfield Cleanup Program (BCP). The State oversees all work under the BCP to ensure a complete and protective cleanup of the site. A BCP cleanup is equivalent to the cleanup that would be done under the State Superfund Program in that Unisys will determine the full extent of the contamination and a remedy protective of public health and the environment will be selected by the State.

What was known and/or investigated when the EHS property was originally purchased?

The school property was purchased in the late 1970s prior to any DEC investigation work.

Site Remediation

Will a full remediation with a complete removal of the contamination be evaluated as a final alternative?

This alternative will be evaluated as part of an alternatives analysis prior to selection of the remedy for the site. A proposed remedy will be made available for public comment prior to finalizing. To meet the requirements of the program, any remedy chosen will be protective of human health and the environment.

What is the schedule for completing the clean up on the high school property?

Interim Remedial Measure (IRM) #2 identifies soil cleanup activities to be completed by Unisys prior to the Elmira City School District replacement of the parking lot and bus loop on the southeast side of the EHS scheduled for this summer. DEC recently secured an accelerated remedial program commitment from Unisys and the Elmira City School district to perform a pre-design investigation on the athletic field area in 2018 to prepare for an IRM #3 in this area in 2019. Following that, a fourth IRM is anticipated on the east side of the school. Concurrently with the IRM work, Unisys is expected to complete the
Remedial Investigation (RI) for the overall site remedy. DEC has requested Unisys to develop an updated project schedule which includes completion of the RI by the end of 2019. After the completion of the RI, a proposed remedy will be put before the community for input before finalizing. Once a final remedy is decided, a schedule for implementing and completing the cleanup will be developed.

**What measures are in place to protect the surrounding community during the IRM work?**

DEC will ensure the implementation of the interim remedial measures is done in a manner that protects the community. Work will be done under an approved Community Air Monitoring Plan (CAMP) that requires continuous air monitoring during all excavation and backfilling activities to ensure that no additional contamination is released to the environment or adjacent properties during cleanup. Dust control measures (e.g., watering) will be taken to reduce dust on temporary dirt roadways and open excavations. Trucks will be covered to properly secure all material during transport. Trucks and equipment will be decontaminated prior to leaving the site. Truck traffic patterns have been designed to maintain safety on local roadways. No visible dust should leave the work areas and if air monitors detect dust above action levels, work is stopped until corrective measures are in place.

**Will there be additional investigation below the slab of the school building?**

Yes, as part of the comprehensive remedial investigation additional investigation below the building will be completed.

**Indoor Air Quality**

**What controls are in place to protect the indoor air quality at Elmira High School?**

A vapor intrusion mitigation system, commonly referred to as a Sub-Slab Depressurization System (SSDS), is continuously operated in the school to address indoor air quality issues. The system located in areas of the building where the volatile compound, TCE, was detected at higher than expected background levels. Subsequent indoor air testing has shown the mitigation system to be effective.

**When were the controls related to the indoor air at the high school installed?**

A sub-slab Depressurization System (SSDS) was installed as part of the construction of the K-wing in 2009. Another was installed in 2010 as part of the mercury abatement project in gymnasium. A SSDS was installed in the cafeteria in 2013 as part of the renovations and expansions. The SSDS in the F-wing was installed in 2014.

**How come the entire school does not have SSDS?**

Several areas of the building had SSDS installed proactively during the school’s expansion and renovation projects as described above. The installation of the F-wing system was driven by indoor air data. Historically, low levels of TCE were detected in Room 127 prior to installation of the SSDS. A SSDS is a proven effective system to mitigate soil vapors and we have collected several years of indoor air data from this room to verify its effectiveness.

In 2014, comprehensive testing of both the air underneath the slab of the building and indoor air was completed at EHS for areas outside the range of the existing sub-slab mitigation systems (located in the K-wing, Cafeteria, and Gym). Sample locations included all previous sampling locations and new
locations based on new information obtained regarding past uses of the site. The results of this investigation documented that TCE was present at 8 of 23 locations in soil vapor below the floor slab, 5 of which were in F-wing. The remaining 3 locations had TCE concentrations below NYSDOH recommended action values and no TCE was detected in the indoor air at these locations.

TCE was present at 8 of the 23 indoor air sampling locations, 6 of which were in F-wing. The levels of TCE detected in the indoor air are all below the NYSDOH Air Guideline Values; however, the level observed in Room 127 was higher than expected despite being less than the Air Guideline Value. As a result, a sub-slab depressurization system (SSDS) was installed in F-wing in 2014 and TCE is no longer detectable in the indoor air in Room 127. The sampling in Room 127 is conducted on an annual basis to continue to demonstrate the effectiveness of the system. The effectiveness of the SSDS is not reduced by the opening and closing of doors and windows. Further indoor air testing in the near future will confirm the effectiveness of the SSDS in any potential areas of concern.

What is the role of the HVAC system in protecting the indoor air?

At one time the HVAC positive pressure system was the only mitigation system operated to reduce the risk of soil vapor intrusion at EHS. Based on the 2014 comprehensive sub-slab and indoor air testing, the existing sub-slab depressurization systems are adequately addressing the potential for exposure resulting from soil vapor intrusion throughout the entire building. A comprehensive evaluation of the current SSDS(s), including sub-slab and indoor air testing, will be completed this summer. As part of this evaluation, the contribution of the HVAC in varying operating modes will be determined. Any changes to the HVAC operation will be based on these tests and implemented prior to next school year.

How are the indoor air controls at the high school monitored and maintained?

In accordance with the Environmental Management Plan, the SSDS(s) are monitored daily to ensure the systems are operational. The systems are inspected quarterly and maintained by the Elmira Central School District (ECSD) in accordance with ECSD engineer’s recommendations. These controls are included in a draft Interim Site Management Plan to be implemented by Unisys under the Brownfield Cleanup Program.

Is it safe to have windows and doors open in the building?

Yes. The effectiveness of the SSDS is not reduced by the opening and closing of doors and windows, as the system is capturing air beneath the slab to ensure it does not enter the building. In addition, outdoor air sampling does not indicate any issues with the quality of the outdoor air at the school property.

Maintenance staff may have directed teachers and other staff to refrain from opening windows and doors for other reasons, for example to increase the efficiency and effectiveness of heating and cooling.

Are the cracks in the floor affecting the indoor air quality?

Cracks in the school flooring do not represent a potential exposure pathway. In response to concerns raised by the faculty and out of an abundance of caution, a thorough inspection of the crack has been conducted. Many of the visible cracks were found to be too small to fill or currently sealed with floor seal. Some cracks were identified that will be filled. This work will be done in conjunction with the comprehensive evaluation of the current SSDS(s) and sub-slab and indoor air testing planned for this summer.
**How does the Sub-Slab Depressurization System (SSDS) work?**

A sub-slab depressurization system vents contaminated soil vapor before it enters a structure. The system consists of PVC piping installed through the slab floor and a fan connected with the piping that draws vapor from beneath the building up to the roof where it is released to the outside air. It is designed to achieve lower sub-slab air pressure relative to indoor air. Thus, even if there are holes, cracks, or other pathways between the building and the subsurface, vapors flow downward, not upward. SSDS are a widely-used, effective method to prevent vapor intrusion into occupied building spaces. These systems are operated continuously and require minimal maintenance.

**School Grounds**

*What measures are in place to protect people from contact with PCB-contaminated soils?*

Protective cover systems (vegetated soil, wood chips, pavement, buildings) are currently in place and reduce the risk of human exposure to PCBs in soils. Moving forward, DEC and DOH will continue work with the Elmira City School District to oversee the careful and coordinated identification and removal of any additional contamination from the site in a manner that is fully protective of public health and the environment and will keep the Elmira community, including EHS staff and students, informed of our ongoing actions.

*Can PCBs or other contaminants migrate upward?*

PCB and Metals impacted soils do not tend to migrate to other environmental media such as groundwater or soil vapor.

*Why is a piecemeal cleanup being done (IRMs, Short Term Response Actions and Protective Cover Systems) rather than a complete removal of the contaminated soil all at once?*

The State’s intends to fully investigate and remediate the entire site. Currently, as broader site investigations are underway to delineate the nature and extent of the contamination found below ground on the site, any potential exposure pathways where students, faculty or visitors could encounter contamination have been appropriately addressed. Protective cover systems (vegetated soil, wood chips, pavement, buildings) are currently in place and reduce the risk of human exposure to PCBs in soils allowing the time to carefully design and plan for future cleanup actions. All cleanup plans developed will be communicated to the faculty and community and include the opportunity for the public to provide comments.

Even though the final cleanup plan is still in development and investigations still underway, cleanup actions continue to advance in coordination with school capital improvement projects for areas where there is known contamination. This is being done to ensure that areas of the site get cleaned up efficiently and only need to be disturbed once, not because there is an immediate threat to the public for potential exposures.

In addition to the previously planned cleanup actions in the summer of 2018, DEC has requested Unisys expedite comprehensive investigations on the athletic field area to fully delineate the nature and extent of the contamination below ground and guide the design of the cleanup for this portion of the site.
While cleanup actions continue, DEC and DOH staff will continue to oversee and conduct additional inspections of the cover systems and air mitigation systems, including conducting additional sampling, to ensure these are functioning properly. Should any deficiencies be noted, immediate actions will be undertaken to ensure they are quickly addressed and eliminated. This commitment will also be incorporated into an Interim Site Management Plan being developed by Unisys.

Offsite Contamination

What is the extent of the offsite contamination?

Contaminants found at Elmira High School (EHS) tend to be more concentrated south and east of the main grand stand area and have been determined to be migrating a short distance east of the site in groundwater (Petroleum / PCBs / Volatile Organic Compounds (VOCs)) and a greater distance to the southeast in Coldbrook Creek sediments (PCBs & Metals).

Elevated levels of contaminants have not been found along the western boundary of the school property and there is no evidence to suggest contaminant migration or disposal west of Main Street. Similarly, there is little evidence of industrial disposal and documented contamination north of the football field however a higher density of sampling will be required in these areas to complete the investigation.

Unisys is responsible for the thorough investigation and remedy for all contaminants that have been disposed or have migrated from the site, as a participant in the BCP at the school site #C808022 and under a consent order for the Coldbrook Creek impacts under site #808043. This includes any residual petroleum and two distinct groundwater contaminant plumes of limited extent east of EHS. The first is impacted with PCBs and is not known to extend east of the rail line, the second is a VOC plume which extends a short distance east of the rail line and is impacted with cis-1,2 Dichloroethene and Vinyl Chloride which are the natural degradation compounds of Trichloroethene (TCE) found in the groundwater at EHS. Diminishing VOC plume concentrations were documented over a 10-year sampling program conducted by DEC from 1997-2007. Additionally, extensive soil vapor sampling conducted by DEC east of the VOC plume confirmed no VOC detections and no migration of these contaminants to soil vapor. The area is served with public water and so no one is drinking the groundwater.

What is known about Miller Pond?

In 1994, Oil Seeps were reported to the NYSDEC Spills Division. The investigation conducted by that division traced petroleum contamination in groundwater back to the EHS where a source to that contamination was identified. Multiple rounds of sampling for PCBs resulted in no detections and it was concluded that the primary contaminant of concern was petroleum consistent with fuel oil. The source area at the EHS was successfully cleaned up using below ground bioremediation techniques and groundwater sampling to document completion. Investigation sampling data suggests that petroleum contamination in groundwater does not extend much beyond the rail line east of EHS.

Who can I contact to report a potential past hazardous waste disposal site?

Residents with information related to potential past disposal in the area can contact the DEC project manager (see contact information below). This information will be evaluated and additional steps will be taken as appropriate.
**Are any impacts to neighboring residential areas to the west of Elmira High School?**

There’s been no indication of disposal to the west of EHS and remedial investigation findings do not indicate that contaminants are migrating to the west. Groundwater flow in the area is toward the east/southeast.

**For More Information**

**Where can I find more information?**

The ECSD maintains a web page with additional information:  
[http://www.elmiracityschools.com/ehsenvironment.cfm](http://www.elmiracityschools.com/ehsenvironment.cfm)

The NYSDEC maintains a web page with additional information:  
[https://www.dec.ny.gov/chemical/102390.html](https://www.dec.ny.gov/chemical/102390.html)

DEC and DOH staff are always available to provide updates, or answer any questions community members or faculty have.

**For project related question, please contact:**

Tim Schneider, P.E. NYSDEC 6274 East Avon-Lima Road Avon, NY 14414 Phone: 585-226-5480  
mailto:timothy.schneider@dec.ny.gov

**For health-related project questions, please contact:**

Dawn Hettrick, P.E. NYSDOH Empire State Plaza, Corning Tower Room #1787 Albany, NY 12237 Phone:518-402-7860 BEEI@health.ny.gov

**How do I stay informed?**

DEC and DOH will continue to keep the public informed as this work progresses and as development of cleanup plans are finalized.

Sign up for the contaminated sites county email listserv to receive site-related information and announcements for all contaminated sites in the county. Sign up for the listserv is available at the following web page:  
[http://www.dec.ny.gov/chemical/61092.html](http://www.dec.ny.gov/chemical/61092.html)