C.T. MALE ASSOCIATES
Engineering, Surveying, Architecture & Landscape Architecture, D.P.C.

MEMORANDUM

DATE: February 27, 2017

TO: William Shaw

FROM: Kirk Moline

RE: ***2017-02-16 Resolved Comment Document – CT Male and NYSDEC's Version of the Extruder Pit and Elevator Pit Water Removal and Sampling Program for the McCaffrey Street Site (442046)***

CC: **Edward Canning, Ray Wuolo, Jonathon Carter, Jon Dippert, James Moras, Jason Johnson (Email)**

The following provides the proposed plan for the Extruder Pit and Elevator Pit Water Removal and Sampling Program for the McCaffrey Street Site based on comments received from NYSDEC dated February 16, 2017.

Extruder Pit

Water will be pumped from the pit in approximately 1-foot intervals of draw-down, starting with the top interval of water and working downward, to the bottom of the pit. The first 40 (+/-) gallons of water removed from each interval will be retained in its own 55-gal, steel drum with poly-lining insert or equivalent container. The drum will not be filled over 40 (+/-) gallons due to long term storage concerns with fluctuating temperatures in the unheated warehouse. The poly-lined drum from each interval will be appropriately labeled and retained at the facility for potential future testing and evaluation. (The materials retained for potential future testing and evaluation shall not be disposed of or removed from the facility without the written consent of the NYSDEC.) The excess water from each interval beyond the first 40 (+/-) gallons pumped out for retention, will be combined in a suitable container or containers (poly tote tank, frac tank, or other approved container) for eventual and appropriate disposal. Each 1-foot interval will be removed using a sump pump. New discharge hose will be used for each 1-foot interval and the sump pump will be rinsed between each interval.

Once the extruder pit is pumped out, the bottom and sidewalls of the pit will be assessed and photographed as applicable. Any drains, weep holes, and /or openings through the floor (bottom) and/or walls of the extruder pit structure will be noted for subsequent evaluation as applicable and appropriate. Samples of any solid/semi-solid-phase product and/or precipitate accumulations observed anywhere within the extruder pit structure and/or within any openings into and/or through the floor (bottom) and/or walls of the extruder pit, will be collected for chemical analysis (see below) in collaboration with the NYSDEC representative. (For planning purposes, two or more samples of such materials may be collected for chemical analysis).

Any solid/semi-solid-phase product and/or precipitate accumulations observed anywhere within the extruder pit after sampling of such material has been completed will be removed utilizing a vacuum truck and transferred directly into a steel 55-gallon drum with baked on liner. The drum will be appropriately labeled and retained at the facility for potential future testing and evaluation.

Samples of the soil below the floor (bottom) of the extruder pit will be collected using a hand auger or Macro-Core Sampler (fitted with an acetate sleeve/liner) (as a secondary method) to facilitate soil description and/or the collection of samples for chemical analysis (as indicated below). It is proposed to collect continuous soil samples below the floor (bottom) of the extruder pit until equipment refusal is encountered or until four feet of soil has been collected for soil description and/or the collection of samples for chemical analysis. Depending on soil conditions and observations, samples for chemical analysis will be collected from the 0-2" interval and the 2-12" interval at a minimum (as applicable), and from any mottled soil zone(s) and/or changes in soil type within the remainder of the collected soil profile at the direction of and/or in consultation with the NYSDEC representative.

Sidewall sampling depth and frequency will be determined based on any observed staining, discoloration, and composition of soil. Samples of the soil will be collected utilizing a hand hoe fixed to an extended handle to lower into the extruder pit. A Macro-Core Sampler (fitted with an acetate sleeve/liner) or hand auger may be used as alternate methods if an adequate volume of material for description and/or the collection of samples for chemical analysis cannot be achieved. Entering the extruder pit is prohibited.

Specific analysis to include the full TCL/TAL List, TOC, pH, and PFCs for all samples. If sample volume is limited, priority of analyses will be as follows: PFCs, MS/MSD (PFCs only at 1 location), TOC, TCL VOC, TCL PCB, and remaining TCL/TAL, pH and CN analyses.

All sampling is based on assumption of slow groundwater recharge into the extruder pit. Pumping may be extended to maintain dry conditions during sampling. Recharge rate of the extruder pit will be monitored employing a pressure transducer at least until stabilization. If conditions allow, manual readings may also be collected supporting the data logged by the pressure transducer. Level readings relative to the top of the concrete slab will be recorded along with the date and time at which the readings were taken.

Elevator Pit

Water will be pumped from the pit in approximately 1-foot intervals of draw-down, starting with the top interval of water and working downward, to the bottom of the pit. The first 40(+/-) gallons of water removed from each interval will be retained in its own 55-gal, steel drum with poly-lining insert or equivalent. The drum will not be filled over 40 (+/-) gallons due to long term storage concerns with fluctuating temperatures in the unheated warehouse. The poly-lined drum from each interval will be appropriately labeled and retained at the facility for potential future testing and evaluation. (The materials retained for potential future testing and evaluation shall not be disposed of or removed from the facility without the written consent of the NYSDEC.) The excess water removed from each interval beyond the first 40 (+/-) gallons pumped out for retention, will be combined in a suitable container or containers (tote tank, frac tank, or other approved container) for eventual and appropriate disposal. Each 1-foot interval will be removed using a sump pump lowered into the pit through an approximate 10-inch by 10-inch hole in the metal grate floor. New discharge hose will be used for each 1-foot interval and the sump pump will be rinsed between each interval.

Once the elevator pit is pumped out, the bottom and sidewalls of the pit will be assessed and photographed as applicable. Any drains, weep holes, and /or openings through the floor (bottom) and/or walls of the elevator pit structure will be noted for subsequent evaluation as applicable and appropriate. If any solid/semi-solid-phase product and/or precipitate accumulations are present anywhere within the elevator pit structure and/or within any openings into and/or through the floor (bottom) and/or walls of the elevator pit, samples may be collected for chemical analysis in collaboration with the NYSDEC representative. If sample collection is limited by access through the

opening in the metal grate floor, media will be left in place until access can be coordinated without compromising safety and integrity of the floor.

Specific analysis to include the full TCL/TAL List, TOC, pH, and PFCs for all samples. If sample volume is limited, priority of analyses will be as follows: PFCs, MS/MSD (PFCs only at 1 location), TOC, TCL VOC, TCL PCB, and remaining TCL/TAL, pH and CN analyses.

Solid/semi-solid-phase product and/or precipitate accumulations observed anywhere within the elevator pit after sampling of such material has been completed will be removed utilizing a drum vacuum or other suction means and transferred directly into a steel 55-gallon drum with baked on liner. The drum will be appropriately labeled and retained at the facility for potential future testing and evaluation. The media will be left in place if access is limited through the opening in the metal grate floor until access can be coordinated without compromising safety and integrity of the floor.

The re-entry of water into the pit will be monitored employing a pressure transducer at least until stabilization. If conditions allow, manual readings may also be collected supporting the data logged by the pressure transducer. Level readings relative to the top of the concrete slab will be recorded along with the date and time at which the readings were taken.

Water (if any) that comes back into the elevator pit will be evaluated employing same methods as first used to characterize the water column (clear plastic tube to identify stratification, if any, and noting color, odor and other organoleptic observations). Additional sampling will be determined based on observation and findings during the evaluation. Water samples collected will be analyzed for the same list of constituents specified for the previous series of water samples collected and analyzed from the elevator pit. Depending on the timing between stabilization of the refill (if any) and water sample collection (as applicable), a single sample or a series of depth-integrated samples may be warranted. This subsequent sampling will be coordinated with the NYSDEC, as applicable.

Field work is tentatively scheduled with the contractor to start Monday March 13th, and is anticipated to be completed within 2 consecutive days.