

From: "James Craft" <jhcraft@gw.dec.state.ny.us>
To: "Gordon Eddington" <gpe@geneva.ny.us>
Date: 8/30/2006 4:48:04 PM
Subject: RE: Geneva Foundry - SAC Amendment Approval & draft supplemental RI comments

Hi Gordon,

No problem; I stopped by your office last week and hand-delivered the SAC approval. I was out gathering some background samples around the foundry and I ran them with the XRF yesterday. I also re-ran the Jan/Feb samples and got much better correlation to lab samples after air-drying and hand-crushing the soil. I'll get it tabulated and share it with you.

In this regard, can Dave send EXCEL files of the lab data for the samples that we collected earlier this year? Also, could you resend the maps of the yards that Neil generated?

NYSDOH would like a map with all the sampling data on it; I'll take a crack at this since I'll have to make some maps for the PRAP/ROD.

Other DOH comments included:

- How do we sort out the lead contribution from the Foundry from other historic sources? I noticed a number of yard samples with coal, cinders, ash, and brick. Is any information available related to "fill" in yards and historic use of coal for heating?
- Remove absolutely ALL references to MADEP background levels for PAHs and metals in soils. Results can be compared to TAGM 4046 (which for metals are background values) or local background data.
- PAHs are elevated on-site and need to be remediated or covered/deed restricted/SMP/periodic certified.
- A more thorough discussion is needed about historic potential Foundry emissions (types of metals and other products used) as well as the history of any air pollution equipment.

Once we get the supplemental RI approved, the PRAP, public meeting, and ROD are next (followed by a remedial design/action work plan and remedial grant). The most contentious issue would appear to be where do we draw the line on yard cleanups (i.e., how much Pb is due to the Foundry)? We would be able to develop a site-specific cleanup number for Pb (400 ppm is the default), if justified. My recent XRF analyses of 40 background samples (many collected along roadways in the vicinity of Foundry) are largely < 250 ppm.

Feel free to contact me for further discussion/clarification. Note too that we can start to process reimbursement for your past costs; I'll contact you if we need more info.

Thanks,

- Jim

James H. Craft
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>>> "Gordon Eddington" <gpe@geneva.ny.us> 08/30/06 3:15 PM >>>
Hello Jim,

Sorry I took so long to respond to this message. I will be working with Dave Meixell to get the necessary revisions completed as requested. We will get this out ASAP.

Is the next step the actual cleanup of the sites? If so, this will really make the neighbors happy.

You should by know have my submission on 305 Main St. If you have any questions or need further documentation please let me know.

Thanks for your help with these projects.

Sincerely,

Gordon Eddington

-----Original Message-----

From: James Craft [mailto:jhcrafft@gw.dec.state.ny.us]
Sent: Tuesday, August 22, 2006 11:35 AM
To: Gordon Eddington
Cc: Bart Putzig; Cameron H. O'Connor; mev05@health.state.ny.us; MeixelDK@obg.com
Subject: Geneva Foundry - SAC Amendment Approval & draft supplementalRI comments

Gordon,

Attached is a .pdf file of the SAC Amendment approval and ERP record keeping guidance (I'll be sending hard copies with attachments via USPS). The amendment provides for 90% reimbursement of eligible on-site investigation costs and up to 100% of State directed remediation off-site as well as 50% reimbursement of eligible demolition costs. Note that the contract ends on December 31, 2006 so all eligible work related to site investigation should be completed by then.

Regarding the draft supplemental RI, the following are comments which were provided in part previously:

- the MADEP citations are not relevant but could be mentioned in one place in the interpretation section;

- the PAH and mercury hits are probably coal-related and phenol hit is likely binder-related as noted (arsenic may also be coal-related);

- the soil cleanup objective for lead should be 400 ppm (mg/kg) following the draft Part 375 regulations:
<http://www.dec.state.ny.us/website/der/superfund/> - Table 375-6.8(b), Restricted Use Soil Cleanup Objectives, Subpart 375-6, Remedial Program Soil Cleanup Objectives, Revised June 14, 2006. For an explanation, see Section 375-6.4.

Please make these revisions and provide a final draft document (1 each) to:

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Regarding 305 Main Street, I assume that you have submitted an ERP investigation application to Albany. As noted in my last communication with Dave Meixell, we thought it best to not include the "Project Information (Complete for Remediation Projects Only)".

Finally, I understand that Bart sent you this:

The Empire State Development Corporation (ESDC) is implementing a new grant program, the "Restore NY Communities Initiative," that offers funding to municipalities for the demolition, reconstruction, and rehabilitation of derelict, abandoned, or condemned buildings under municipal control. The application deadline for the initial funding round closes on 9/15/06.

Restore NY can be of particular benefit to municipalities who have

applied or are considering applying to the Environmental Restoration Program because these monies can be applied to the municipalities' 50% share of demolition costs.

The following ESDC website link will lead users to a Restore NY fact sheet, Questions & Answers, and a Request for Funding/Grant Application:
<http://www.empire.state.ny.us/restoreNY>

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