

Honeywell
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May 13, 2014

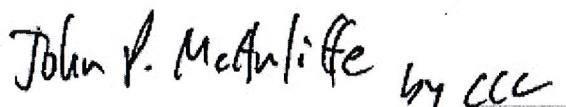
To: Harry Warner, NYSDEC, Region 7 (1 bound)
Holly Sammon, Onondaga County Public Library (1 bound)
Samuel Sage, Atlantic States Legal Foundation (1 bound)
Cara Burton, Solvay Public Library (1 bound)
Mary Ann Coogan, Camillus Town Hall (1 bound)
Moon Library, SUNY ESF (1 bound)
Diane Carlton, NYSDEC, Region 7 (1 PDF)
Joseph J. Heath, Esq., Onondaga Nation (1 bound)
Chris Fitch, Communications (cov ltr – email)

Re: Letter of Transmittal – Onondaga Lake Remediation Repository Addition

The below document has been approved by the New York State Department of Environmental Conservation (NYSDEC) and is enclosed for your document holdings:

- Revised Proposed Plan to Add Seven Compounds to Speciated VOC List – Air Quality Monitoring Program – May 5, 2014

Sincerely,

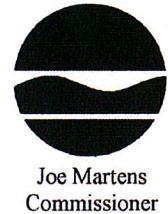
Handwritten signature of John P. McAuliffe in black ink, with the initials 'by CCC' written below it.

John P. McAuliffe, P.E.
Program Director, Syracuse

Enc.

cc: Tim Larson, P.E. (O'Brien & Gere Engineers, Inc.)

New York State Department of Environmental Conservation
Division of Environmental Remediation
Remedial Bureau D, 12th Floor
625 Broadway, Albany, New York 12233-7013
Phone: (518) 402-9676 • **Fax:** (518) 402-9020
Website: www.dec.ny.gov



May 8, 2014

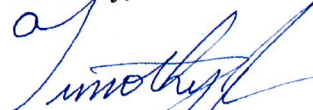
Mr. John P. McAuliffe, P.E.
Program Director, Syracuse
Honeywell
301 Plainfield Road, Suite 330
Syracuse, NY 13212

**Re: Proposed Plan to Add Seven Compounds to Compounds to Speciated VOC List
Air Quality Monitoring Program, Onondaga Lake Remediation, Dated May 5, 2014**

Dear Mr. McAuliffe:

We have received and reviewed the above-referenced document, which was transmitted on your behalf by Mark Distler's May 6, 2014 email addressed to my attention, and find that the revised plan has addressed our previous comments. Therefore, the Proposed Plan to Add Seven Compounds to Compounds to Speciated VOC List, Air Quality Monitoring Program, dated May 5, 2014, is hereby approved. Please see that copies of the final document, containing this approval letter, are distributed to the document repositories selected for this site.

Sincerely,



Timothy J. Larson, P.E.
Project Manager

ec: B. Israel, Esq. - Arnold & Porter
J. Davis - NYSDOL, Albany
M. Schuck - NYSDOH, Albany
M. McDonald - Honeywell

R. Nunes - USEPA, NYC
M. Sergott - NYSDOH, Albany
M. Distler - O'B&G

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May 5, 2014

Mr. Tim Larson, P.E.
 New York State Department of Environmental Conservation
 Division of Environmental Remediation
 Remedial Bureau D, 12th Floor
 625 Broadway
 Albany, NY 12233-7013

**RE: Revised Proposed Plan to Add Seven Compounds to Speciated VOC List
 Air Quality Monitoring Program
 Onondaga Lake Remediation**

Dear Mr. Larson:

NYSDEC requested, in a February 3, 2014 discussion with William Daigle, Honeywell to add seven compounds to the air quality monitoring program's current analytical list of 25 compounds currently being sampled for the Onondaga Lake Remediation. A proposed plan, dated February 24, 2014, was submitted for the DEC's review and approval. This revised plan incorporates the DEC's comments transmitted on March 22. It proposes the following details to add the compounds:

- Additional compound analytical reporting limits and proposed work perimeter limits
- Sampling schedule
- Exceptions to procedures specified in the Air Monitoring Quality Assurance Project Plan (QAPP)
- Reporting schedule

Compounds and Limits

The proposed seven additional compounds are the same ones that were temporarily added to the monitoring program for four sampling events in July and August 2013, the results of which were reported to you in a letter dated September 25, 2013. The following table presents the compounds and their anticipated reporting limits and proposed 12-month work perimeter limits.

Table 1. Proposed Additional Compounds

Compound	Practical Quantitation Limit ($\mu\text{g}/\text{m}^3$)	Reporting Limit ^a ($\mu\text{g}/\text{m}^3$)	Proposed 12-Month Work Perimeter Limit ^b ($\mu\text{g}/\text{m}^3$)
Cumene	0.49	1.3	400
Cyclohexane	0.34	0.93	6,000
Decane	2.9	7.6	700
Indene	2.4	6.2	57
Octane	2.3	6.1	3,300
Styrene	0.42	1.2	1,000
1,2,3-Trimethylbenzene	2.5	6.4	22

^a Assumes final canister vacuum of 15 "Hg (2.68 dilution factor). Canister samples with less vacuum will result in lower reporting limits.
^b Based on the lower of the NYSDEC Annual Guideline Concentration (October 2010) and the US EPA Regional Screening Level (November 2013) for industrial air (TR=1E-06; THQ=1.0)

Sampling Schedule

The seven additional compounds will be analyzed from the same canister samples being collected for the current speciated VOC sampling at the SCA, which consists of 24-hour samples collected every sixth day. Based on your request on March 22, the compounds were added to the target analyte list for the set of samples collected on March 25.

Analysis of the original list of speciated VOCs, as well as the additional compounds, will continue for each sample collected until at least such time that the long-term air monitoring is curtailed upon approval by the Department. As we approach the completion of the capping of the SCA, DEC, in consultation with Honeywell, will make a determination with respect to whether or not long-term air monitoring will need to continue.

QAPP Exceptions

Laboratory analytical procedures, where applicable, will be conducted in accordance with the approved QAPP analytical procedures with the following exceptions:

1. **Method Detection Limit (MDL)** – An MDL study will not be performed for Octane, Indene, Decane or 1,2,3-Trimethylbenzene.
2. **Canister Cleaning** – At certification of canisters, the seven compounds will be reviewed as Tentatively Identified Compounds (TICs) at the Practical Quantitation Limit (PQL).
3. **Laboratory Control sample (LCS)** – LCS recovery limits for Octane, Indene, Decane and 1,2,3-Trimethylbenzene will be 60 to 140 percent instead of 70 to 130 percent for the other compounds.

Reporting

A tabulated summary of speciated VOC sample results (uncorrected and background-corrected) are currently submitted to the NYSDEC each month. Analytical results for the seven additional compounds will be included with the monthly summaries but will have a separate summary table for averages because the 12-month averaging period of the seven additional compounds will be different than the 12-month period for the other 25 compounds, which spans from mid-July one year to mid-July the next year. The seven additional compound analytical data will also be validated once per quarter along with the other 25 compounds.

Please let me know if you have any questions or require additional information. If not, please respond with the DEC's comments and/or approval of the proposed plan.

Sincerely,

 by CCC

John P. McAuliffe, P.E.
Program Director, Syracuse

cc: Bill Daigle – NYSDEC
Don Hesler – NYSDEC
Mary Jane Peachey – NYSDEC
Reggie Parker – NYSDEC
Bob Edwards – NYSDEC
Bob Nunes – USEPA
Mark Sergott – NYSDOH
Maureen Schuck – NYSDOH
Tom Byrne – Honeywell

Mr. Tim Larson, P.E.

May 5, 2014

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Bill Hague – Honeywell

Larry Somer – Honeywell

Christopher Jaros – Arnold & Porter

Mark Distler – O'Brien & Gere