



FMC Corporation
1735 Market Street
Philadelphia, PA 19103
USA

215.299.6000
fmc.com

Transmitted Via Email and U.S. Mail

February 26, 2016

Ms. Deborah L. Gardell, PE
RCRA Permitting Section
Division of Environmental Remediation, Remedial Bureau E
New York State Department of Environmental Conservation
625 Broadway, 12th Floor
Albany, NY 12233-7016

Mr. Nathan Freeman, PE
NYSDEC Project Coordinator
Division of Environmental Remediation, Remedial Bureau B
New York State Department of Environmental Conservation
625 Broadway, 12th Floor
Albany, NY 12233-7016

Re: FMC Corporation, Middleport, NY
AOC Docket No. II-RCRA-90-3008(h)-0209
EPA ID No. NYD002126845
DER Site No. 932014
Application No. 9-2936-00017/02004
Amended Part 373 Permit Application

Dear Ms. Gardell and Mr. Freeman:

As identified in the draft revised schedule that FMC Corporation submitted to the New York State Department of Environmental Conservation (NYSDEC) by letter dated January 29, 2016, FMC submits the following documents associated with the draft Amended Part 373 Permit Application for FMC's Middleport, New York facility:

1. Attachment R – Waste Analysis Plan
2. Attachment S – Security and Facility Inspection Plan
3. Attachment T – Personnel Training Program Plan

If you have questions or would like additional information, please contact me directly by telephone at (215) 299-6554 or by email at shawn.tollin@fmc.com.

Sincerely,

Shawn J. Tollin
Manager, Environmental Remediation

Enclosures

cc: (e-mail only)
S. Dewes, NYSDEC
M. Infurna, USEPA
G. Sullivan, FMC Middleport
C. Kaba, Esq., FMC Philadelphia
R. Kennedy, Esq., Hodgson Russ
W. Lachell, GEI Consultants
D. Wright, Arcadis

ATTACHMENT S

Security and Facility Inspection Plan



**FMC Corporation
Middleport, New York**

SECURITY AND FACILITY INSPECTION PLAN

**USEPA ID # NYD002126845
NYSDEC Site # 932014**

DRAFT February 2016

**FMC Corporation
Middleport, New York**

**USEPA ID # NYD002126845
NYSDEC Site # 932014**

SECURITY AND FACILITY INSPECTION PLAN

Table of Contents

Record of Change

1.0	INTRODUCTION	1
2.0	SECURITY PROCEDURES AND EQUIPMENT	1
2.1	Barrier and Means to Control Entry	1
2.2	Warning Signs	2
3.0	INSPECTIONS	3
4.0	GLOSSARY	4

SECURITY AND FACILITY INSPECTION PLAN

1.0 INTRODUCTION

This Security and Facility Inspection Plan was developed by FMC Corporation (FMC) for its Middleport, New York facility to ensure compliance with the requirements of 6 NYCRR Part 373-2.2(f) and (g). This Plan provides a description of the equipment and procedures in place to prevent unknowing or unauthorized entry of persons or livestock onto active portions of the hazardous waste management areas of the facility, along with inspection procedures to identify and prevent system malfunction, equipment deterioration, and human error.

When changes in the facility or operations/equipment associated with hazardous waste units subject to the Part 373 permitting requirements occur, FMC will revise the inspection schedules and/or criteria contained in this plan. The requirements for making changes and/or revisions to this document are provided in Condition D of Module 1.

2.0 SECURITY PROCEDURES AND EQUIPMENT

FMC complies with the security provisions of 6 NYCRR 373-2.2(f)(2) and 373-2.2(f)(3) as outlined below. The following paragraphs describe applicable aspects of the plant security system.

2.1 Barrier and Means to Control Entry

In accordance with 6 NYCRR Parts 373-2.2(f)(2)(ii)(a), the facility operations are enclosed with a 6-foot tall chain-link fence in good repair. The fence surrounds the active portion of the facility, including the facility units subject to the Part 373 permitting requirements (i.e., Western Surface Impoundment [WSI] and Eastern Surface Impoundment [ESI]). Closed regulated units are permanently capped, which prevents unknowing or unauthorized access. All structures and equipment associated with closed regulated units are secured from unknowing or unauthorized entrance with locks and signage.

In accordance with 6 NYCRR Part 373-2.2(f)(2)(ii)(b), entry to active portions of the facility is controlled. Normal access to the facility is through electronic gates at the Main and Truck Entrances along Route 31. The gates are operated by either a security pass card or remote control, and are monitored from the Main

Office or Shipping and Maintenance Offices. Employees are provided with security badges for entry to the plant at the Main Entrance gate. All other gates are kept locked when not in use by authorized personnel.

Visitors and contractors to the facility are required to sign a log at the reception desk at the main entrance. Prior to admittance to the facility, all visitors, contractors or drivers must provide information including name, business affiliation, reason for visit, person whom visiting, and date and time of entry and exit. Each visitor is then given a temporary visitor's badge to be displayed at all times. An escort is provided for the visitor while they are at the facility. At the end of each visit, visitors are required to turn in the badge and sign out, then repeat the sign-in process for each subsequent day of the visit, if applicable.

Unauthorized access to the facility is prevented by the security fence and the closed/locked entrance/exit gates.

2.2 Warning Signs

Warning signs are located at each gate, along the perimeter fences facing out, and are visible from any approach. All warning signs are legible from a distance of at least 25 feet and written in English. The warning on the signs reads as follows:

Private Property
NO TRESPASSING
FMC Corporation - Middleport, NY
Danger - Unauthorized Personnel Keep Out

3.0 INSPECTIONS

Inspection requirements associated with facility units subject to the Part 373 permitting requirements (i.e., WSI and ESI) and interim corrective measures (ICMs) associated with RCRA corrective actions subject to the Part 373 Permit are identified in documents listed below.

No.	Plan Title	Components/Items Inspected
1	<i>Western Surface Impoundment (WSI) Operations Plan (WSI Operations Plan)</i>	WSI liner, WSI underdrain sump and pump
2	<i>North Site Cover Operations and Maintenance Plan (North Site Cover O&M Plan)</i>	North Site Cover (vegetated and asphalt covers), underdrain sumps and pumps
3	<i>Groundwater Extraction System Operations and Maintenance Plan (Groundwater Extraction O&M Plan)</i>	Groundwater recovery trenches, pumps, and force mains
4	<i>Operation, Maintenance and Monitoring Plan for the North Railroad Property Phase 1 Interim Corrective Measures (NRR Property Phase 1 OMM Plan)</i>	Surface cover on the North Railroad Property Phase 1 ICM area
5	<i>Operation, Maintenance and Monitoring Plan for the North Railroad Property Phase 2 Interim Corrective Measures (NRR Property Phase 2 OMM Plan)</i>	Surface cover and catch basin on the North Railroad Property Phase 2 ICM area
6	<i>North Commercial/Industrial Area Wooded Parcel Site Management Plan Relative to 2007 Early Action Remedial Work (Wooded Parcel SMP)</i>	Surface cover, catch basin, and Culvert 105 inlet on the Wooded Parcel
7	<i>Culvert 105 Sediment Chamber MH-N9 at Margaret Droman Park – 2007 Early Actions Monitoring and Maintenance Plan Relative to Remedial Work (Culvert 105 MHN9 Plan)</i>	Culvert 105 Sediment Chamber MH-N9 and Manhole MH-N8B
8	Site Management Plan (SMP)	Security fencing and warning signs; safety, spill and emergency response equipment; emergency communication systems

Recordkeeping associated with the inspections conducted are discussed in the abovementioned plans.

4.0 GLOSSARY

<u>Term</u>	<u>Definition</u>
6 NYCRR	Title 6 of the New York Codes, Rules and Regulations
ESI	Eastern Surface Impoundment
ICM	interim corrective measure
NYSDEC	New York State Department of Environmental Conservation
O&M	Operations and Maintenance
OMM	Operations, Maintenance and Monitoring
SMP	Site Management Plan
WSI	Western Surface Impoundment