

NORTHEASTERN **ENVIRONMENTAL** TECHNOLOGIES CORP.

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April 18, 2003 Mr. William Blain NYSDEC Region 4 Spill Unit 1150 North Westcott Rd. Schenectady, New York 12306

RE: FAIRVIEW PLAZA HUDSON, NY SITE (SPILL CASE # 0204750)

Dear Mr. Blain:

I have prepared this work plan document to outline the remedial measures proposed to address the chemical contamination previously identified at the above noted property. This document presents our best professional judgement and is based on the existing soil and groundwater information assimilated by this firm during our July and August 2002. Tetra chloroethene soil 1,400 ppb water 5 ppb

Remedial Approach

To address the areas found to contain petroleum soil contamination in a way protective of the environment we propose a focused soil removal program. The work proposed would be generally limited to isolated areas surrounding your maintenance garage and equipment storage yard. Based on the data assimilated thus far we anticipate \pm 10 - 20 cu. yds. of petroleum contaminated soil to be removed during this

remedial action (see Attachment A).

The petroleum soil removal services will focus on visibly stained unimproved ground surfaces. The available soil quality data suggests the petroleum contamination to be localized and limited to the upper \pm 1.0 - 3.0 foot soil horizon. Based on the low permeable soil conditions encountered at the site the documented surface soil contamination is not expected to represent a threat to groundwater. Surface soil samples collected from the areas surrounding select pad mounted transforming equipment have been found to be unaffected by PCBs and will also be removed. A properly calibrated PhotoVac Model 2020 photoionization meter (PID) will be used to direct the soil removal services. Excavation services will be will be performed to remove visible and olfactory contamination or until achieving background VOC concentrations. End point soil samples will be collected at each excavation to document the post soil removal quality conditions for each removal zone. All end point samples will be analyzed for the chemical parameters inherent to the NYS Department of Environmental Conservation (DEC) STARS Method 846-8021 & 8270.

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A NETC project geologist staff will direct all excavation services, perform real time soil quality monitoring activities as well as coordinate the off site transportation of the soil contamination. It is presently anticipated that all petroleum-contaminated soil will be transported to the City of Albany Rapp Rd. Landfill.

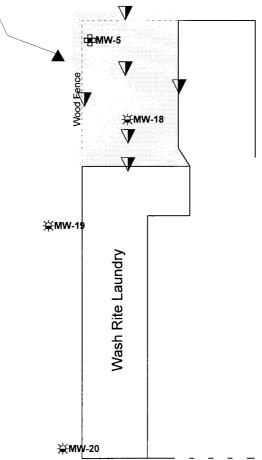
Similar soil removal services are proposed at the rear (eastern) entrance of the Wash Rite facility to remove soil found to contain the chlorinate organic chemical Tetrachloroethene (PERC) and its daughter compounds. The available soil quality data suggests detectable levels of chlorinated organic contamination to be limited to the upper 15.0 foot soil horizon east of the Wash Rite facility. Soil quality information identify TAGM soil cleanup level exceedances to be limited to the upper 2.0 foot soil horizion. The historical presence of low levels of PERC, Trichloroethene and cis-1,2, -Dichloroethene in groundwater are also limited to the rear of the Wash Rite facility. The lack of detectable levels of chlorinated organic compound in the network of wells surrounding the Wash Rite facility suggest a limited surface release of PERC east of the Wash Rite facility.

Based on the SI information developed thus far, it is the opinion of the firm that a focused soil removal program is also a viable means to remove the chemical contaminants of concern identified at the rear entrance of the Wash Rite facility. Based on the available soil boring information, and considering the existing improvements, the relative areal extent of the PERC release that would be considered accessible to conventional excavation methods is estimated at \pm 355 - 888 cubic yards (see Attachment A). A 40ft. x 40ft. soil removal zone is proposed at this time (see Figure 1).

NETC staff will perform real time soil gas screening techniques on site using a combination of hand held PID equipment and a PhotoVac Model 10S70 field gas chromatograph (GC). The soil gas monitoring services will be used to direct the areal and vertical extent of the soil removal program. Excavation services will be performed to achieve background VOC concentrations for the soil removal zone. Following the soil removal services, end point soil samples will be collected and analyzed for the chemical parameters inherent to EPA Method SW846-8260 testing criteria to document the post excavation soil quality condition in the removal zone. The frequency and degree to which post excavation samples will be collected will be based on the field conditions encountered following the soil removal work as well as input received from the DEC. It is presently anticipated, based on the relative location of the soil removal zone, that at a minimum, sixpost excavation end point soil samples will be subjected to confirmatory laboratory analysis.

Groundwater encountered during the excavation services will be removed as necessary to facilitate the soil removal effort. Dewatering services of this nature will afford an initial measure of groundwater treatment for the chlorinated contaminants of concern. All groundwater will be initially directed to an on site frac tank. The use of on site groundwater treatment methods (i.e., air stripping and activated carbon treatment) may be employed in the event prolonged dewatering services are deemed necessary.

Proposed Soil Removal Zone





₩MW-21

LEGEND

- DPT Boring / 1-inch PVC Monitoring Well Location
- ▼ Proposed End Point Soil Sample

Notes:

- Map based on Hershberg & Hersberg map no. 000277 dated 9/27/00, revised 10/5/00.
- Well location based on field measurements.
- Elevations are in feet and based on a datum of 100.0 feet.

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FIGURE 1: Proposed Soil Removal Zone

PROJECT: Washrite Facility

Fairview Plaza Hudson, New York

Project # 02.05244

Scale: I" = 40.0'

Date: 4-18-03

Path: common/netc/sites/fairviewplaza/si/maps/washritegwsitemap

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The soil removal zone will be closed with clean fill purchased locally for this work. One 4.0 inch PVC monitoring well will be installed in the excavation to facilitate post soil removal groundwater monitoring and / or removal services.

All PERC contaminated soil will be staged on site on 6ML poly synthetic liners until off site disposal arrangements are made for the waste. Based on the available soil chemistry, it is presently anticipated that the majority of the PERC contaminated soil will be sufficiently below the DEC TAGM 4046 action levels to be considered a "contained out" chemical contaminant. Contaminated soil which meets the DEC's criteria to be considered "contained out" will be thermally treated at Environmental Soil Management Inc.'s facility in Fort Edward NY. We propose the use of Laboratory Method EPA SW-846-8260 and the DEC's STARS Memorandum No. 1 soil testing frequency to demonstrate the regulatory appropriateness for a "contained out" determination. All contaminated soil that meets the "contained in" criteria would be transported to the ChemWaste Management's Model City Hazardous Waste Landfill Facility located in Buffalo, NY.

A status report of findings will be prepared at the conclusion of the proposed remedial measures. The report will be prepared and submitted to the DEC for formal consideration. The report will document all remedial field activities, discuss the rationale and methods selected and identify the post excavation soil and groundwater quality concentrations at the site. The report will also present, if necessary, other remedial options deemed appropriate for the site.

Following the soil removal services, a quarterly groundwater-sampling program will be instituted at the site to monitoring natural attenuation rates for the chemicals of concern. All groundwater samples will be subjected to EPA Method 8260. Quarterly progress reports will be generated and submitted to the DEC. Data collected using the methodologies described in this work plan will be used to interpret and describe further the petroleum contamination that has been found to affect the site. Presentation of data will be clear and concise, providing an understanding of site conditions, risk to human health and the environment.

A reassessment of the groundwater quality condition will be performed in advance of the soil removal services to consider any significant variations in the sites groundwater quality that would impact on the viability of this work plan. Please contact me with any specific question and / or comments regarding the services outlined herein. The NETC organization and I remain available to assist you and the DEC with this important matter.

Sincerely,

Northeastern Environmental Technologies Corporation

effrey T. Wink, President

JTW/epa

c.c. Mr. Tony Fabiano Fairview Plaza

ATTACHMENT A

SOIL REMOVAL ESTIMATES

SOIL REMOVAL ESTIMATES FAIRVIEW PLAZA 160 Fairview Avenue Hudson , New York

Location	Approximate Surface Stain Size (feet)	Cubic Feet	Total Yards Removed
Wash Rite	40 x 40 x 15	0.009,6	888.0
Maintaince Building			
AST Location	7.0 × 9.0 × 3	189.0	7.0
Former Drum Location	$6.0 \times 5.0 \times 0.5$	15.0	9.0
Equipment Stain in Shed	$3.0 \times 4.0 \times 0.5$	0.9	0.2
Equipment Stain in P. Lot	$8.0 \times 8.0 \times 0.5$	32.0	1.2
Pole Mounted Transformer]	<0.25
Pad Mounted Transformer			<0.5

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Northeastern Environmental Technologies Corporation



□ Urgent ✓ Please Reply		☐ Please Recycle		
		✓ For Review		☐ Please Comment
	SITE (SPILL CASE # 0204750)			
Re:	FAIRVIEW PLAZA HUDSON, NY	CC:	Mr. Tony Fabiano 882-1580	
Phone:	(518) 357-2386	Date:	04/18/03	
Fax:	(518) 357 - 2398	Pages	7	
To:	Wr. William Blain NYSDEC	From:	Jeffrey T. Wink	c – President

[•] **Comments:** At the request of the Mr. Tony Fabiano I have developed this work plan to address the soil condition identified at the site in 2002. Please contact me regarding your opinion on this work plan. Thank you in advance for your attention to this important matter.