



ecology and environment engineering, p.c.

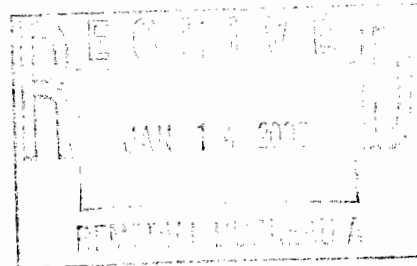
International Specialists in the Environment

BUFFALO CORPORATE CENTER 368 Pleasant View Drive, Lancaster, New York 14086

Tel: 716/684-8060, Fax: 716/684-0844

January 11, 2008

Heather Bishop
New York State Department of Environmental Conservation
Division of Environmental Remediation
Remedial Bureau A
625 Broadway, 11th Floor
Albany, New York 12233-7015



Re: Revisions to SPDES Permit Equivalent Application
Liberty Industrial Finishing Site
Farmingdale, Nassau County, New York

Dear Ms. Bishop:

On behalf of the Liberty Industrial Finishing Site, Ecology and Environment Engineering, PC (EEEPC) is currently implementing a design for groundwater treatment at the industrial site (Index No. II CERCLA-97-0203), as required by the United States Environmental Protection Agency (EPA). In September 2005, your office responded with limits for discharge of the treated groundwater. Since that time, EEEPC has received permission from Nassau County to discharge the treated groundwater to the County sewer system. However, EEEPC has recently added to the remedial design, pumping from the Magothy Aquifer, which is expected to have metals concentrations significantly less than in the previous application, prompting EEEPC to consider treatment and disposal an option. Therefore, we have revised and are resubmitting this application requesting discharge limits for discharge to groundwater.

Also, EEEPC has discussed a different discharge location with Nassau County. The new discharge location is an infiltration gallery on site. A map of the new proposed discharge location is included with this revised application.

Because of this, EEEPC is revising this application to include only a portion of the discharge previously applied for. The revised application is enclosed. We would like the opportunity to discuss the details of the proposed discharge with you. Please contact me at (716) 684 - 8060 or jfazzolari@ene.com if you require any additional information.

Sincerely,

John Fazzolari, P.E.
Project Manager

Ecology and Environment Engineering, PC

SPDES Permit Equivalent Application Requirements

1. Discharge Rate (i.e. treatment system design capacity)
Approximately 100 GPM is estimated at this time;
2. A brief description/flow diagram for the proposed treatment system
The specific treatment elements will be determined after preliminary SPDES discharge limits are received. However, we anticipate that this system will include flow measurement and control, preliminary filtration, and organics removal using Granulated Activated Carbon. The sizes of these and other equipment will be determined based on meeting discharge limitations.
3. A description of the receiving stream, including an accurate map showing the stream and discharge location. When available, provide latitude and longitude of discharge point.
Map is attached. The proposed discharge point is an infiltration gallery on site, north of the treatment building.
4. Provide available wastewater monitoring data in the attached forms, prepared using the attached Table 6-10.
Please see Attachment 1.
5. The proposed first day of discharge (for pump test discharges please do not encourage pump tests during summer low flow periods).
Discharge is estimated to begin during calendar year 2008.
6. Proposed duration of discharge.
The estimated duration depends on the progress of the groundwater cleanup effort, and is therefore difficult to estimate. However, for the purposes of this application, the duration is estimated at 50 years.
7. State whether it is a potentially responsible party, federal superfund or state superfund site.
Liberty Industrial Finishing Site is a federal superfund site (Identification Number NYD000337295).
8. Please note that it is not unusual for a DOW review to take 12 weeks. Please inform responsible parties to plan on submitting requests for effluent criteria at least 12 weeks in advance of the proposed first day of discharge.
9. Include the name and telephone number of the responsible DER project engineer to contact if we have questions or want to borrow a copy of the RI report.
TBD by Heather Bishop
10. The Site number.
CERCLIS Identification Number NYD000337295.
11. The DER contact/address where compliance monitoring data is to be sent.
The DER contact for the Liberty Industrial Finishing Site is as follows:
Heather Bishop
Division of Environmental Remediation
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12. For discharges that will have iron in excess of 0.3 mg/L:
- Provide monitoring data for iron from both filtered and unfiltered samples.
Monitoring data from one sample location shows ferrous iron (Fe^{2+}) concentration of 3.3 mg/l. Filtered sample data is not available. However, results from other sample locations at this depth indicate that a filtered result would be similar to the unfiltered result.
 - If the discharge is to groundwater please provide monitoring data for the iron from both filtered and unfiltered samples from monitoring wells not influenced by site contamination.
See Table 1 below

Table 1. Iron Monitoring Data from Groundwater Monitoring Wells located outside the Plume Area.

Well Identification	Date of Sample Collection	Analyte	Iron Concentration (mg/L)
MW-10B	08 Apr 1998	Unfiltered	0.304
MW-10B	19 Aug 1998	Unfiltered	0.0471
MW-10B	08 Apr 1998	Filtered	0.0475
MW-10B	19 Aug 1998	Filtered	0.0471
MW-10C	08 Apr 1998	Unfiltered	1.51
MW-10C	19 Aug 1998	Unfiltered	2.99
MW-10C	08 Apr 1998	Filtered	1.27
MW-10C	19 Aug 1998	Filtered	2.59
MW-23B	08 Apr 1998	Unfiltered	6.80
MW-23B	19 Aug 1998	Unfiltered	0.174
MW-23B	08 Apr 1998	Filtered	6.29
MW-23B	19 Aug 1998	Filtered	0.0471
MW-24B	08 Apr 1998	Unfiltered	0.181
MW-24B	19 Aug 1998	Unfiltered	0.582
MW-24B	08 Apr 1998	Filtered	0.0475
MW-24B	19 Aug 1998	Filtered	0.0471
MW-24C	08 Apr 1998	Unfiltered	3.25
MW-24C	19 Aug 1998	Unfiltered	2.93
MW-24C	08 Apr 1998	Filtered	3.13
MW-24C	19 Aug 1998	Filtered	3.05

Data taken from the 2000 Remedial Investigation completed for the Liberty Industrial Finishing Site by URS Corporation.

- If the discharge is relatively large compared to the receiving water, please provide monitoring data for iron from both filtered and unfiltered samples from an upstream point of the receiving water.
N/A

ATTACHMENT 1

SPDES Permit Equivalent Requirements Application

Table 1. Conventional Monitoring Information

Parameter	Raw Wastewater or Monitoring Well				Projected or Actual Treated Wastewater (if available)		
	Units	Min	Max	Avg.	Min	Max	Avg.
Flow	GPM	N/A	N/A	N/A			100
pH	s.u.	N/A	N/A	N/A	6.11	5.76	7.12

Monitoring information for BOD₅, TSS, TDS, TKN, and Ammonia can be sampled if requested and/or required by the NYSDEC.

Sampling Information:

- i. Do you know or have reason to believe that any of the pollutants listed in Tables 6, 7, or 8 of the instructions are present in the discharge from this outfall?
 - Yes** - If yes, monitoring data must be included in Table 2.
 - No** - Go to Item ii below.

- ii. Do you know or have reason to believe that any of the pollutants listed in Table 9 or Table 10 of the instructions or any other toxic harmful, or injurious chemical substances not listed in Tables 6 – 10, are present in the discharge from this outfall?
 - Yes** - Source or reason for presence in discharge attached.
 - Yes** - Quantitative or qualitative data attached.
 - No**

Table 2. RAW WATER Monitoring Information for Priority Pollutants, Toxic Pollutants, and Hazardous Substances from Off-site Wells (to be treated as necessary)

CAS #	Parameter	Raw Wastewater or Monitoring Well		Projected or Actual Treated Wastewater
		Units	Estimated Average	Estimated Average
7440-43-9	Cadmium	µg/L	2	Not available
7440-47-3	Chromium	µg/L	5	Not available
18540-29-9	Hexavalent Chromium	µg/L	ND	Not available
79-01-6	TCE	µg/L	ND - 500	Not available
127-18-4	PCE ¹	µg/L	ND - 20	Not available
1634-04-4	MTBE	µg/L	ND - 2.6	Not available
75-71-8	Freon	µg/L	ND - 2	Not available

Notes: ND - Non Detect

¹Daughter products of PCE, such as TCE and DCE, may be present in trace amounts throughout the plume.

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Map is attached. The proposed discharge point is an infiltration gallery on site, north of the treatment building.
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N/A

New York State Department of Environmental Conservation
Division of Environmental Remediation
Remedial Bureau A
625 Broadway, 11th Floor
Albany, New York 12233-7015
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Website: www.dec.state.ny.us



JAN 31 2008

Mr. Matthew Millias, P.E.
Camp Dresser & McKee
Salina Industrial Powerpark
One General Motors Drive, Suite 2
Syracuse, New York 13206

RE: Draft Remedial Investigation/Feasibility Study Work Plan
Sharon Cleaners
Saratoga Springs, New York
Site No. 5-46-052

The following are comments regarding the Draft Remedial Investigation/Feasibility Study Work Plan, dated January 2008, for the Sharon Cleaners site located in Saratoga Springs, New York:

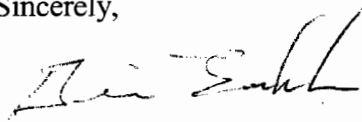
1. Remedial History, last paragraph, first sentence - Suggest changing "standard" to TAGM 4046 Cleanup Objective.
2. Task 2, soil sampling, fourth paragraph, last sentence - Suggest changing to within 24 inches. Suggest including a fifth soil sample within the building footprint (located at the eastern end of the trench).
3. Task 2, soil sampling, last paragraph - Suggest indicating the depth of the background samples, suggest approximately 2-3 feet below ground surface. The proposed background locations and off-site soil vapor points are located in similar locations, suggest utilizing the soil vapor points to obtain the background soil samples.
4. Task 2, groundwater sampling, first paragraph, ninth sentence - Suggest indicating that low flow sampling procedures will be utilized to match the 2.11s. Tenth sentence - Suggest indicating that groundwater measurements are recorded to 0.01 of a foot.
5. Task 2, soil vapor sampling, first paragraph, fifth sentence & Task 3 Sub-Slab Soil Vapor & Indoor Air Sampling, first paragraph - Suggest verifying that laboratory canisters will be certified to the reporting limits.
6. Task 2, soil vapor sampling, first paragraph, soil vapor construction - Suggest revising the thickness of the glass beads to be a total of 1 to 2 feet. Suggest revising the text pertaining to how the seal will be created since a slurry consists of hydrated bentonite; therefore, the placement of water for hydration is only necessary when granular bentonite is utilized.
7. Task 2, soil vapor sampling - Suggest including a tracer gas test.

8. Task 2, survey sampling locations, second sentence - Suggest removing vertical since a GPS unit will be utilized.
9. Task 3, second paragraph - Suggest removing tracer gas test. Suggest indicating that the thickness of the concrete slab will be documented when installing the sub-slab sample point. Suggest verifying the setup time of hydraulic cement, typically less than 10 minutes. Suggest indicating that sub-slab soil vapor will be released outside the building. Suggest indicating that indoor air and ambient air samples will be obtained from the breathing zone, ~4' above the floor. Ambient air samples shall be located up wind of the site.
10. Task 6 - Suggest indicating that if visible contamination or elevated PID readings are observed from the liquids, they will be containerized for proper disposal.
11. Task 6, Assumption for Task 6 - Suggest indicating that all soil cuttings will be drummed. Soil vapor installation procedure indicates that the points will be sealed to ground surface. Due to soil vapor points being installed via geoprobe, minimal soil cuttings should be anticipated.
12. Assumptions:
 - a. Task 2 - CDM should contact the City of Saratoga Springs for work in the right-of-ways since CDM is preparing the street cutting permit.
 - b. Chemtech - Correct text to Sharon Cleaners instead of Town and Country Cleaners.
 - c. Surveying - Suggest removing the surveying assumptions.
13. Sheet No. 1 and Table 1 - The idea of using the street numbers as part of the sample identification is a good idea; however, the Department tries to minimize the connection between the structures as much as possible by simply utilizing randomly assigned numbers. The structure information provided on Sheet No. 1 (proposed air sample set & note 5) and on Table 1 - Task 3 (location & tentative sample #) should be simplified as provided on Table 1-Task 4 (location). When completing the DOH building surveys the building number should be identified not the building address or owner. The field notes will need to be submitted under a separate cover with a key that links the building numbers with property contact information.
14. Sheet No. 1 -
 - a. Suggest moving B-8 (soil sample and temporary well) near SS-3 to assess conditions behind the building.
 - b. The text correctly states that soil vapor intrusion sampling will be conducted at eleven structures, but Sheet No. 1 identifies ten locations. Suggest including 10 Whitney Place.
 - c. The locations for soil borings B-4 and B-11 appear to be outside a potential area of contamination based on available data. Their locations for now are acceptable, but should be considered temporary based on field observations.
 - d. Suggest moving SV-8 closer towards the road so it will fall in the right-of-way.
 - e. Suggest including an additional soil sample within the building at the eastern end of the trench.

15. Figure 1 - Suggest moving MB-5 to SV-5 location (grassy area south of the library parking lot). Suggest moving MB-3 towards the end of Gurtler Lane, near MW-6, due to the minimal influences from traffic and road maintenance.
16. Table 1, Schedule 2.11 (f), Environmental Quality Assoc. & Chemtech - Suggest including QA/QC samples (MS/MSD & FD) for groundwater analysis of metals and hex chromium.
17. Schedule 2.11(d) 4, site-dedicated equipment - Suggest verifying text for items 3 and 4.

The revised work plan shall be submitted by February 19th, 2008. Three hard copies and one electronic version should be submitted. Please contact me if you have any questions or comments.

Sincerely,



Brian Jankauskas, P.E.
Environmental Engineer II
Remedial Bureau A, Section C

cc: J. Swartwout
B. Guidetti, NYSDOH
edocs/file