

August 15, 2019

Mr. Drew Hoffert  
Project Manager, Division of Environmental Remediation  
New York State Department of Environmental Conservation  
Region 4  
1130 South Westcott Road  
Schenectady, New York 12306-2014

Via Electronic Mail

Re: ALCO-Maxon Parcel A Spill Number 1604483  
ALCO – BCP Site C447042  
Schenectady, NY

Dear Mr. Hoffert:

To date, the response action to the petroleum seep emanating from the riverbank, has included the use of aerators, a surface washing agent, and containment boom, as well as absorbent fabric. Based on preliminary discussions with a contracted drilling firm, we have determined that it would be feasible to inject oxidant on an angle to address some of the residual petroleum outside the grout wall.

We are proposing to advance 10 borings approximately 30 degree angle to roughly 15' BGS at locations along the riverbank. Each boring would be finished as a screened injection well with a seal at the surface to block daylighting of injection materials. Chemical oxidant (PerSulfOx®) will then be injected into each injection well; the amount of oxidant will depend on the field conditions and the capacity of each well to accept the oxidant solution.

While we believe that a significant portion of the residual petroleum can be degraded, there are potential drawbacks to the approach, which include:

- Likely temporary liberation of residual petroleum in the river near the shore (which will be mitigated with containment boom and application of OSC-1809 Surface Washing Agent).
- The ability to deliver enough oxidant to the affected areas.
- Significant cost





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Nevertheless, B&L is proposing to perform this work during October – November, when the recreational season is closed to allow for limited disruption of boat traffic. Please advise whether this additional response action is approved.

Very truly yours,

BARTON & LOGUIDICE, INC.

A handwritten signature in black ink, reading "Andrew J. Barber".

Andrew J. Barber  
Sr. Environmental Consultant

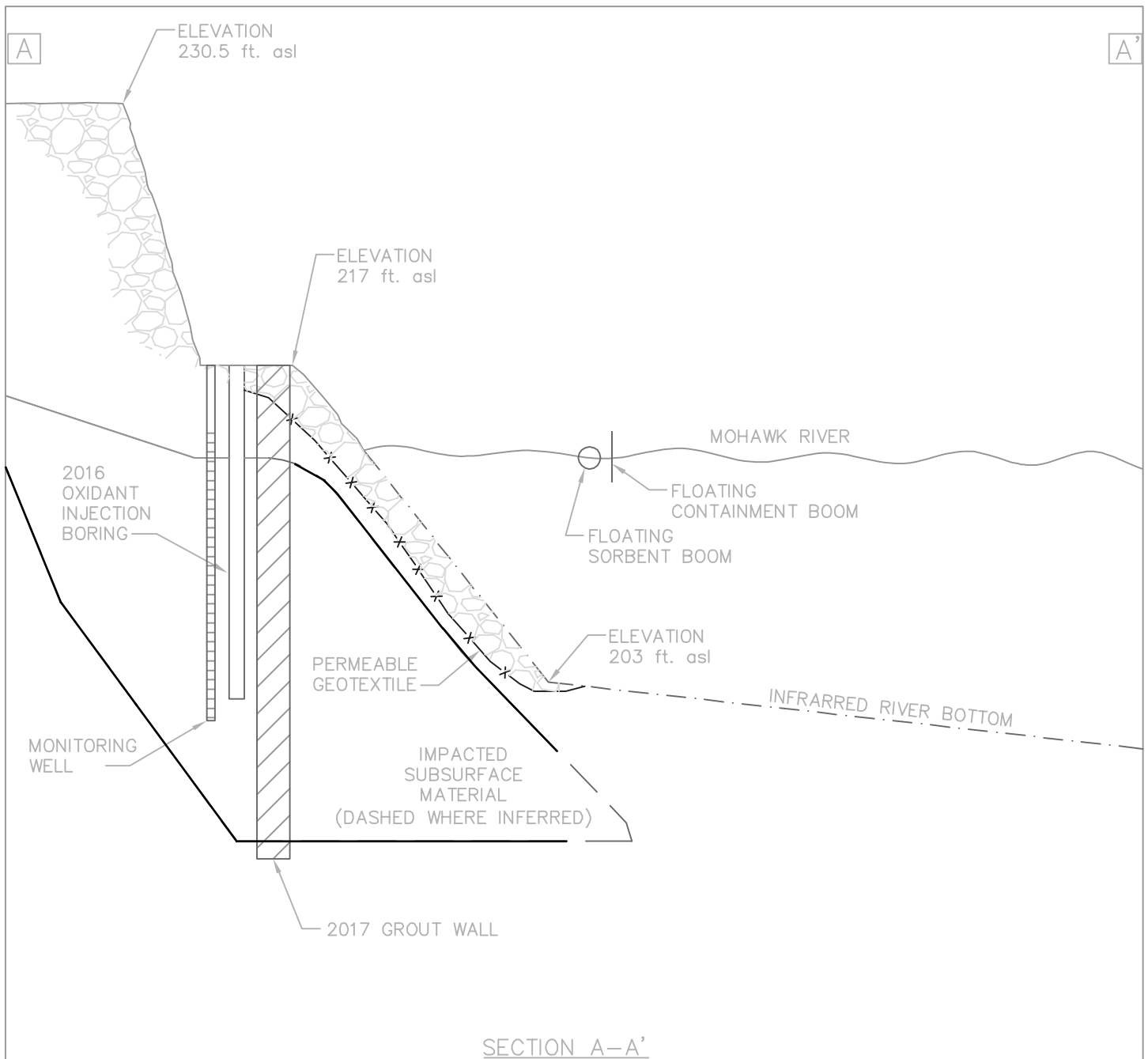
CIS/AJB/

Enclosure

cc:	Tom Owens, Esq.	- Maxon ALCO Holdings LLC
	Steve Luciano	- Maxon ALCO Holdings LLC
	Paul Fallati	- Maxon ALCO Holdings LLC
	Dean Sommer, Esq.	- Young Sommer
	Rich Ostrov	- NYSDEC Region 4, OGC
	Steve Lawrence	-NYSDOH

**Attachment A - Existing  
Conditions**

Plotted: ☒ SYR By: ☒



**Barton**  
& **Loguidice, D.P.C.**

MAXON ALCO HOLDINGS, LLC.  
ALCO BROWNFIELD SITE

EXISTING RIVERBANK  
CROSS SECTION

Figure Number  
1

Project Number  
1368.001.004

Date  
MAY, 2019

Scale  
NOT TO SCALE

SCHENECTADY, NY.

SCHENECTADY COUNTY, NEW YORK