AMERADA HESS CORPORATION

732-750-6000
732-750-6105 (FAX)

1 HESS PLAZA
WOODBRIDGE, NJ 07095-0961

July 22, 2003

Mr. Carl Hettenbaugh
Bureau of Spill Prevention and Response
New York State Department of Environmental Conservation (NYSDEC)
6274 East Avon-Lima Road
Avon, New York 14414

VIA: CERTIFIED MAIL # 7000 1670 0012 2876 6760
RETURN RECEIPT REQUESTED

Re: (Closed) Hess Station # 32458
1314 Fairport Road
Fairport, New York
NYSDEC Spill #97-01135

Dear Mr. Hettenbaugh:

Amerada Hess Corporation (Hess) has prepared the enclosed Corrective Action Plan (CAP) for the above-referenced site in accordance with the executed Stipulation Agreement, dated September 22, 1999. This CAP describes the implementation schedule of the *Remedial Action Plan* approved by the NYSDEC on May 5, 2003. Site work associated with the remedial action described in this plan is tentatively scheduled to begin in October 2003.

If you have any questions, please contact Meagan Gabe of Quantum Management Group, Inc. (Quantum) at (732) 750-6482 or the undersigned directly at (732) 750-7068.

Sincerely,

Dawn M. Coughlin

Dawn M. Coughlin
Manager, Refining and Marketing Remediation

Enclosure

cc: Shaw E & I, Rensselaer (w/ enclosure)
Brian Kelly, GSC (w/ enclosure)
Meagan Gabe, Quantum (w/o enclosure)

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CORRECTIVE ACTION PLAN

CORRECTIVE ACTION PLAN (CAP) FOR SPILL NO. 97-01135

1. The Respondent submitted a Remedial Action Plan (RAP) to the Department on October 9, 2002 for comment and approval. Written approval of the revised RAP was granted by the Department to the Respondent on May 5, 2003.

2. The approved RAP shall be made part of the Stipulation Agreement between the Respondent and the Department.

3. The Respondent is implementing the approved RAP and is prepared to start-up the remediation system in accordance with the approved implementation schedule and following approval of the CAP by the Department.

4. The Respondent proposes that the specific cleanup goals, intended to justify eventual system shutdown, be performance based. These performance based cleanup goals will be determined through an evaluation of historical system performance data. When the data show that the remedial treatment system appears to have achieved asymptotic removal rates, the remedial treatment system will be cycled on and off for a minimum of one month to evaluate the influence that the period of inactivity has on contaminant concentrations. If an increase in concentrations is observed when the remedial treatment system is re-started, the Respondent will pulse the system until the post-shutdown concentrations are the same as the pre shut-down concentrations, indicating that the remedial treatment system is no longer capable of additional mass removal. In addition, groundwater analytical data will be evaluated to ensure that a decreasing trend in dissolved mass is evident.

5. Following remedial treatment system shut-down, a minimum of four (4) post-shutdown groundwater quality data sets will be collected and evaluated to ensure that asymptotic conditions have been reached.

6. To the extent that any measures undertaken pursuant to the Corrective Action Plan requires air point source treatment and discharge, the Respondent shall be authorized to undertake such treatment and discharge in accordance with the general conditions attached as Appendix A and the applicable standards contained in Appendix B, notwithstanding any otherwise applicable requirements.

Any modifications to this CAP must be approved in advance in writing by the Department.

Appendix A:
SVES Data Sheet

To: Peter Miller, NYSDEC Region 8
From: Amerada Hess Corporation

1. Reason for Submittal:

X Notice of Operation
_____ Notice of Removal of Emission Control Equipment

2. Spill Name: **Closed Hess Station #32458**
Spill Location: **1314 Fairport Road**
Fairport, Monroe County, New York

3. Spiller: **Amerada Hess Corporation**
Address: **One Hess Plaza**
Woodbridge, NJ 07095

4. Spill Number: **97-01135** Pin Number: _____

5. Start-Up Date: **October, 2003**

6. Estimated Project Duration: **5 years**

7. Emission Point

a.	Emission I.D. Number:	001	
b.	Ground Elavation Above Sea Level:	425	FT.
c.	Stack Height:	20	FT.
d.	Height Above Nearest Structure:	8	FT.
e.	Stack Inside Dimensions:	0.5	FT.
f.	Air Exit Temperature:	183	°F.
g.	Air Flow-rate:	200	CFM.
h.	Air Exit Velocity:	16.97	FT/SEC
i.	Benzene Concentration in Air Influent:	41,840	UG/M3
		0.0313	LB/HR
		12.88	PPM-V
j.	Distance from Base of Stack to Nearest On-Site Bldg:	10	FT
k.	Distance from Base of Stack to Nearest Off-Site Bldg:	>100	FT

8. Operation Time

a.	Hours/Day:	24	
b.	Days/Year:	365	
c.	% Operation by Season:	25% Winter	25% Summer
		25% Spring	25% Fall

9. Process Description

Soil Vapor extraction to remove volatile compounds from petroleum-contaminated soil.

10. Emission Controls

_____ Not Needed Based on Analysis of Pilot Test Data
_____ Not Needed Based on Analysis of Operating Data
_X_ Described Below

11. Control Equipment

a. ID Number: 01

b. Control Type:

_____	none	_____	thermal afterburner
_X_	activated bed absorber	_____	catalytic unit
_____	other, explain:		

c. Manufacturer's Name: **Envirotrol, Inc.**

d Model Number: **VP-110M**

e. Disposal of Collected Contaminants:

_____	landfill off-site	_____	recycled on-site
_____	recycled in the process	_____	**public sewer**
_X_	other, explain:		
	Reactivated off-site		

f. Date Emission Control Operations Began: **October, 2003**

g. Expected Useful Life: **3 months**

12. Contaminant:

a.	Name:	**Benzene**	
b.	CAS Number:	**71-43-2**	
c.	Control Equipment Input: (= 7i)	**0.0313**	LBS/HR (or UG/m^3 or PPM-V)
d.	Control Equipment Efficiency:	**75**	%
e.	**Control Equipment Output** (=(1-12d.) x 12c.)	**0.007825**	LBS/HR (or UG/m^3 or PPM-V)
f.	Permissible Air Emission Rate:	**0.009190**	LBS/HR (or UG/m^3 or PPM-V)

13. Fuels used for Combustion Vented to the Same Emission Point

a. Fuel Used:

_X_	none	_____	oil
_____	gas	_____	other, explain:

b. Fuel Type:

_____	#2 fuel oil	_____	natural gas
_____	#4 fuel oil	_____	LP gas
_____	diesel fuel	_____	other, explain:

c. Amount : _____ x 10^3 GALS/YR (oil)
x 10^3 FT^3/YR (gas)

d. For Oil Only, Sulfur Content: _____ % By Weight

e. For Gas Only, Heating Value: _____ BTU/FT3

Appendix B:
Air Stripper Data Sheet

To: Peter Miller, NYSDEC Region 8
From: Amerada Hess Corporation

1. Reason for Submittal:

X Notice of Operation
____ Notice of Removal of Emission Control Equipment

2. Spill Name: **Closed Hess Station #32458**
Spill Location: **1314 Fairport Road**
Fairport, Monroe County, New York

3. Spiller: **Amerada Hess Corporation**
Address: **One Hess Plaza**
Woodbridge, NJ 07095

4. Spill Number: **97-01135** Pin Number: _____

5. Date Air Stripping Operations Began: **October, 2003**

6. Estimated Project Duration: **5 years**

7. Emmission Point

a.	Emmission I.D. Number:	**002**	
b.	Ground Elavation Above Sea Level:	**425**	FT.
c.	Stack Height:	**30**	FT.
d.	Height Above Nearest Structure:	**13**	FT.
e.	Stack Inside Dimensions:	**0.5**	FT.
f.	Air Exit Temperature:	**68**	°F.
g:	Water Flow-rate:	**15**	GPM.
h.	Air Flow-rate:	**300**	CFM.
i.	Air Exit Velocity:	**25.46**	FT/SEC
	= Air Flow-rate in CFM / Cross Sectional Area of Stack in FT^2		
j.	Benzene Concentration in Water Influent:	**20,000**	UG/L
k.	Distance from Base of Stack to Nearest On-Site Bldg:	**4**	FT
l.	Distance from Base of Stack to Nearest Off-Site Bldg:	**>100**	FT

8. Operation Time

a. Hours/Day: **24**

b. Days/Year: **365**

c. % Operation by Season: 25% Winter 25% Summer
25% Spring 25% Fall

9. Process Description

Air stripper to remove volatile compounds from groundwater, and to discharge the compounds to the atmosphere via cross-current air flow.

10. Emission Controls

_____ Not Needed Based on Analysis of Design Conditions

_____ Not Needed Based on Analysis of Operating Conditions

__X__ Described Below

11. Control Equipment

a. ID Number: *002*

b. Control Type:

_____ none _____ thermal afterburner

__X__ activated bed absorber _____ catalytic unit

_____ other, explain:

c. Manufacturer's Name: **Envirotrol, Inc.**

d Model Number: **LP-55**

e. Disposal of Collected Contaminants:

_____ landfill off-site _____ recycled on-site

_____ recycled in the process _____ public sewer

__X__ other, explain:

Carbon regenerated off site

f. Date Emission Control Operations Began: **October, 2003**

g. Expected Useful Life: **1 year**

12. Contaminant:

a. Name: **Benzene**

b. CAS Number: **71-43-2**

c. Stripper Water Input: **1.36E-01** LBS/HR

(= 7g. In GPM x 7j. In UG/L x 4.542 x 10^{-7})

d.	Stripper Efficiency:	99.9 %
e.	Stripper Water Output: (= 12c. - (12c. X 12d. /100))	0.00013626 LBS/HR
f.	Control Equipment Input: (= 12c. - 12e.)	1.36E-01 LBS/HR
g.	Control Equipment Efficiency:	50 %
h.	Control Equipment Output: (= 12f. - (12f. X 12g. /100)	6.81E-02 LBS/HR
I.	Permissible Water Input Conc.:	20,000 UG/L
j.	Permissible Air Output Conc.:	6.81E-02 LBS/HR

13. Fuels used for Combustion Vented to the Same Emission Point

a. Fuel Used:

X none _____ oil

_____ gas

_____ other, explain:

b. Fuel Type:

_____ #2 fuel oil _____ natural gas

_____ #4 fuel oil _____ LP gas

_____ diesel fuel _____ other, explain:

c. Amount : _____ x 10^3 GALS/YR (oil)

x 10^3 FT^3/YR (gas)

d. For Oil Only, Sulfur Content: _____ % By Weight

e. For Gas Only, Heating Value: _____ BTU/FT^3