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Sterling Environmental Engineering, P.C.

October 31, 2014

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Via Email (brad.shaw@dec.ny.gov)

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Subject: Seep Mitigation Plan & Engineering Report
Orange County Landfill
NYSDEC Site No. 336007
STERLING File #2010-15 (Task 313)

Transmitted herewith is the comprehensive Seep Mitigation Plan & Engineering Report. This document is intended to be in full satisfaction of Paragraphs II. B and C of the proposed Order on Consent.

With respect to Paragraph II. D. of the proposed Order on Consent, sediment sampling was not previously discussed and is outside the scope of the December 18, 2013 Work Plan approved by the NYSDEC. Substances of concern with the target seeps have been identified and thoroughly evaluated in the Seep Mitigation Plan & Engineering Report.

We believe sediment sampling of the canal and canal banks is unnecessary. The canal is subject to frequent and significant flooding. Flood deposition and river silt are clearly evident on the canal banks and seep locations. Sediment sampling will be meaningless in terms of characterizing the seeps as the sediments and soils at the seep locations will be strongly influenced by the significant flood deposition on the canal banks. Further, as a practical matter, the Cheechunk Canal is under consideration for dredging as part of a regional flood control project. Future dredging will include sediment characterization in accordance with the permit to dredge.

We are available to discuss the Seep Mitigation Plan & Engineering Report and are prepared to address NYSDEC questions and comments. Upon approval of the plan, Orange County is prepared to:

- Immediately effectuate the expedited remediation of current seeps to protect the seeps, soils and sediments from erosion. This work will proceed immediately by Orange County Department of Public Works manpower and equipment.

- Proceed with completion of the Plans, Specifications and Contract Documents for the construction and implementation of the groundwater recovery and treatment as set forth in Section 5.0 of the Plan. A detailed implementation schedule is set forth in Section 6.3 of the Plan.

Please contact me should you have questions.

Very truly yours,

STERLING ENVIRONMENTAL ENGINEERING, P.C.

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MPM/bc
Email/First Class Mail
Enclosure (Seep Mitigation Plan & Engineering Report)

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