EXPLANATION OF SIGNIFICANT DIFFERENCE
American Felt & Filter Company

Town of New Windsor / Orange County / Site No. 3-36-036 / March 2008

Prepared by the New York State Department of Environmental Conservation
Division of Environmental Remediation

1.0 INTRODUCTION

The purpose of this Explanation of Significant Difference (ESD) is to document a change in the selected remedy for the American Felt & Filter Company site (the Site), which is located at 361 Walsh Avenue in the Town of New Windsor, in Orange County. The site is located on approximately eight acres along the south bank of the Quassaick Creek, less than one mile west of the Hudson River. See the attached Figure 1.

In March 2004, the New York State Department of Environmental Conservation (NYSDEC) signed a Record of Decision (ROD) which selected a remedy for the Site. The 2004 ROD selected a Dual Phase Extraction (DPE) system as the remedy for the Site. The ROD also required installation of several bedrock groundwater monitoring wells, monitoring of groundwater and soil vapor, development of a soil management plan, and implementation of institutional and engineering controls. For more information on the remedy selected by the ROD refer to Section 2.

The portion of the main mill building which was located above the source of the groundwater contamination has been demolished, which has made direct excavation of the source area soils possible. The remedy is being changed to excavation of the contaminated soils from this area, eliminating the need for the DPE system. All other elements of the remedy selected by the ROD will remain in place. See the attached Figure 2.

This Explanation of Significant Difference will become part of the Administrative Record for this Site. The information here is a summary of what can be found in greater detail in documents such as the March 2004 ROD, the July 17, 2007 proposal to amend the ROD and other documents that have been placed in the following repositories:

Newburgh Free Library
124 Grand Street
Newburgh, NY 12550
Attn.: Reference Librarian
Phone: (845)561-1985

Office of the Clerk
Town of New Windsor
555 Union Avenue
New Windsor, NY 12553
Attn.: Town Clerk
Phone: (845)563-4600

NYSDEC- Region 3 Headquarters
Division of Environmental Remediation
21 S. Putt Corners Road
New Paltz, NY 12561-1620
Attn.: John Rashak, Project Manager
Phone: (845)256-3179

Although this is not a request for comments, interested persons are invited to contact the Department's Project Manager for this Site to obtain more information or have questions answered.

2.0 SITE DESCRIPTION AND ORIGINAL REMEDY

2.1 Site History, Contamination, and Selected Remedy

The American Felt and Filter Company Site is an industrial complex located at 361 Walsh Avenue in the Town of New Windsor, in Orange County. The Site is located less than one mile west of the Hudson River on approximately eight acres along the south bank of the Quassaick Creek, which forms the dividing line between the City of Newburgh to the north and the Town of New Windsor to the south. See Figure 1.

Manufacture of felt and felt products has been the primary operation at the Site since the late 1800's when the American Felt Company began manufacturing felt fabrics for general use. The Company changed ownership several times over the years but its original name (American Felt Company) was retained until 1978. The name has since been changed to The American Felt and Filter Company. The present owner has retained this name.

The felt products currently manufactured at the Site include felt fabrics and felts that are impregnated with chemicals for various products and mechanical uses. Felts are also dyed at the Site with a variety of organic and synthetic dyes. Trichloroethane (TCA), a chlorinated hydrocarbon widely used as an industrial solvent, was utilized at the Site. Based on interviews with past employees, there were numerous spills of TCA inside and outside the northwest corner of the main building. The use of TCA at the Site was discontinued in the early 1990's.

American Felt and Filter Company (AFFC), the remedial party, signed an Order on Consent (legal agreement) with the NYSDEC on March 31, 1998. Pursuant to the order, a Remedial Investigation (RI) was conducted between January 1988 and November 2002 to define the nature and extent of any contamination resulting from previous activities at the Site. The RI included sampling of soil, groundwater, bedrock groundwater, surface water, soil vapor and indoor air. The primary contaminant of concern, TCA, was found in the soil and groundwater in the north central portion of the Site, immediately south of Quassaick Creek.

Based on the RI, a Feasibility Study (FS) was completed to evaluate potential remedial alternatives for the Site, which led to the NYSDEC issuing a Proposed Remedial Action Plan (PRAP) for the Site in February 2004. The PRAP was made available for public comment and resulted in the NYSDEC issuing the ROD in March 2004, which included the following elements:

1. Installation of a soil and shallow groundwater contamination treatment system known as a dual phase extraction (DPE) system. The DPE remediates the Site by extracting both groundwater and soil vapor from the subsurface. The extraction of groundwater lowers the water table, which creates a greater expanse of unsaturated soil, which thereby enhances the soil vapor extraction process. The DPE system separates the liquid and air streams to allow separate treatment and discharge of each stream.

2. Installation of three bedrock monitoring wells on the eastern perimeter of the Site.

3. Implementation of a groundwater monitoring program to monitor the effectiveness of the remedy.

The monitoring program includes ongoing evaluation of bedrock monitoring well data.

4. Implementation of a soil gas monitoring program which includes baseline and annual soil gas sampling of the area of impact beneath the northwest corner of the main building.

5. Development of a soils management plan in order to address residual contaminated soils that may be excavated from the Site during future redevelopment which requires soil characterization and, where applicable, disposal/reuse in accordance with NYSDEC regulations.

6. Imposition of an institutional control in the form of an environmental easement which requires compliance with the approved soils management plan outlined in item #5, limits the use and development of the property to commercial or industrial uses, restricts the use of groundwater as a source of potable or process water to that which has the necessary water quality treatment as determined by the Orange County Department of Health, and requires the property owner to complete and submit to the NYSDEC the periodic certification outlined in item #7.

7. The property owner is to provide a periodic certification which certifies that the institutional controls and engineering controls put in place are unchanged from the previous certification, and that nothing has occurred that would impair the ability of the controls to protect public health or the environment.

8. The operation of the components of the remedy will continue until the remedial objectives have been achieved, or until the NYSDEC determines that continued operation is technically impracticable or not feasible. At the time of this determination, a work plan would be developed to perform a post-remediation evaluation of the effectiveness of the remedy in eliminating potential exposure from sub-slab vapor impacts. Once the system is shut down, this evaluation of sub-slab vapor would be completed. If the evaluation indicates that contamination remains, mitigation would be necessary through a depressurization system.

3.0 CURRENT STATUS

The remedial party has completed the installation of three bedrock monitoring wells on the eastern perimeter of the Site and baseline soil gas sampling. AFFC has also demolished the northwest corner of the main building at the Site (see Figure 2), and has proposed to modify the remedy to excavate the contaminated soil in the vicinity of the demolished footprint to meet the 6 NYCRR Part 375 Soil Cleanup Objectives for groundwater protection.

4.0 DESCRIPTION OF SIGNIFICANT DIFFERENCES

The following describes the significant differences to the remedy, compared to the remedy selected in the March 2004 ROD:

Scope: Instead of a DPE system, the remedial party will be required to excavate, and dispose of off-site, the contaminated soil until the Protection of Groundwater standard of 0.68 parts per million for TCA is met (per Table 375-6.8(b) in 6 NYCRR Part 375). Periodic certifications, in lieu of annual certifications will be employed, however, all other elements of the 2004 ROD-selected remedy will remain the same.

Performance: Excavation of contaminated soils is equally or more effective at protecting of human health and the environment as compared to the DPE system. Excavation of contaminated soil could be completed in a few months, while the DPE system would require a year or more to remove the source of groundwater contamination.

Cost: The cost of the excavation and appropriate disposal of contaminated soil, estimated cost of $300,000, is significantly less than the projected cost for the installation, operation and maintenance of the DPE system, estimated cost of $415,000.

5.0 SCHEDULE AND MORE INFORMATION

If you have questions or need additional information you may contact any of the following:

Project Information:	**Health-Related Information:**	**Citizen Participation:**
John Rashak	Fay Navratil	Michael Knipfing
NYSDEC Region 3 Headquarters	NYSDOH - BEEI	NYSDEC Region 3 Headquarters
21 S. Putt Corners Road	Flanigan Square	21 S. Putt Corners Road
New Paltz, New York 12561-1620	547 River Street	New Paltz, New York 12561-1620
Phone: (845) 256-3179	Troy, New York 12180	Phone: (845) 256-3154
	Phone: (800)458-1158 ext. 27850	

3/5/08
Date

John J. Rashak, Project Manager

Mar 5, 08
Date

Ramanand Bergadia, Regional Hazardous Waste Remediation Engineer
Region 3

3/17/08
Date

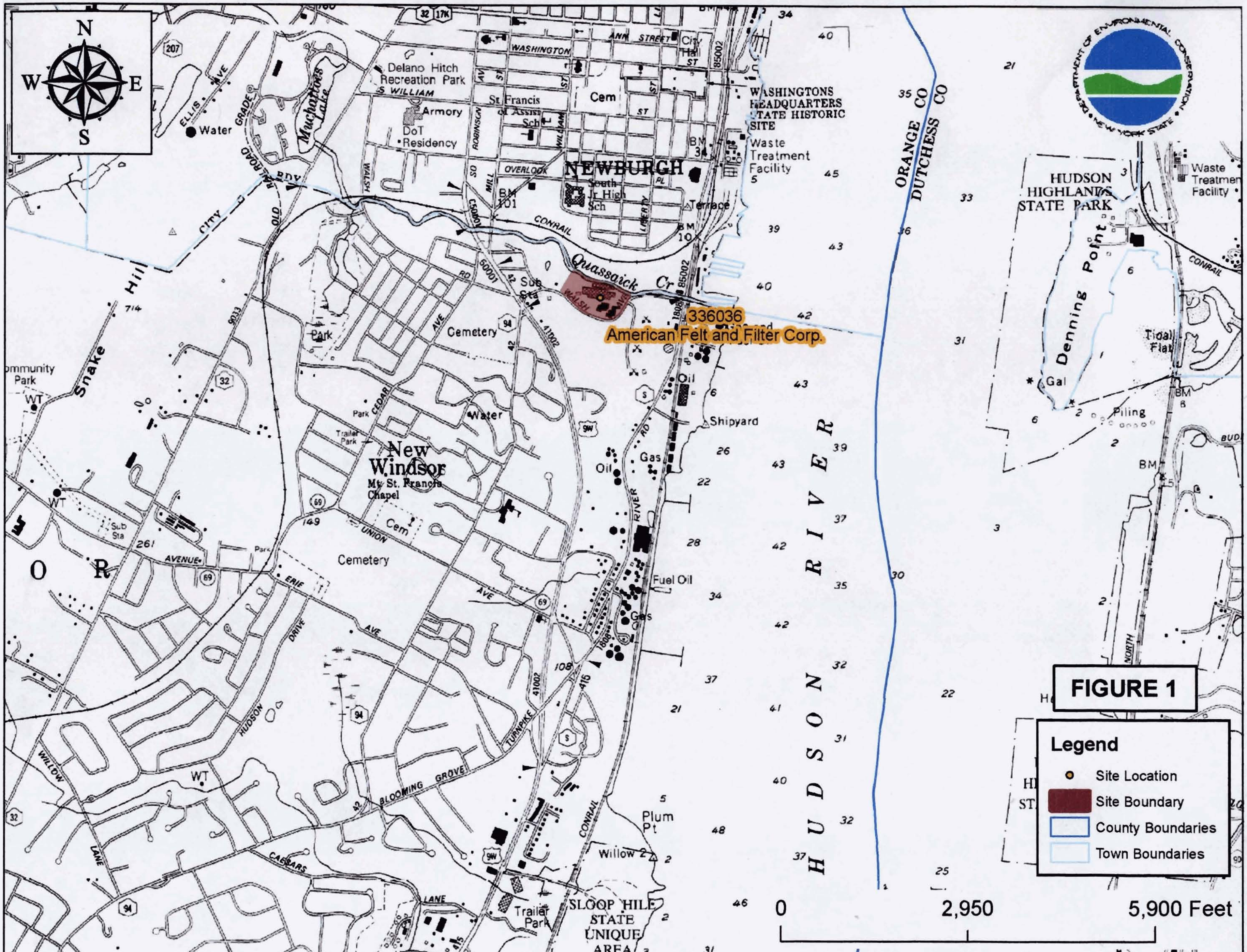
Robert W. Schick, Director
Remedial Bureau C

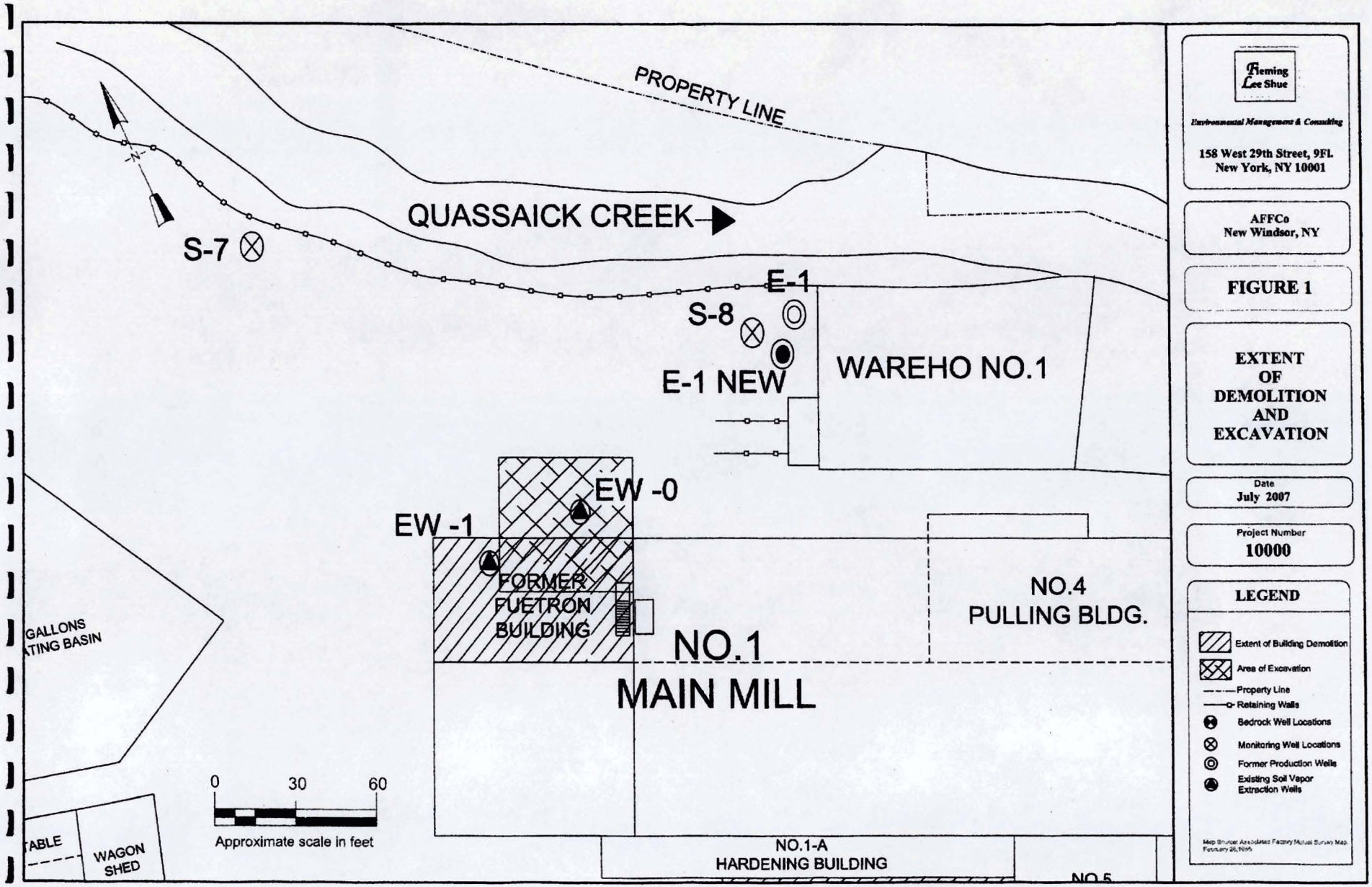
3/19/08
Date

Salvatore Ervolina, Assistant Director
Division of Environmental Remediation

3/20/08
Date

Dale A. Desnoyers, Director
Division of Environmental Remediation


336036
American Felt and Filter Corp.
Legend
Site Location
Site Boundary
County Boundaries
Town Boundaries
0
2,950
5,900 Feet
N
S
E
W
NEWBURGH
New Windsor
HUDSON RIVER
ORANGE CO
DUTCHESS CO
Quassaick Cr
WASHINGTONS HEADQUARTERS STATE HISTORIC SITE
Waste Treatment Facility
HUDSON HIGHLANDS STATE PARK
Denning Point
Tidal Flat
SLOOP HILL STATE UNIQUE AREA
Plum Pt
Shipyard
Delano Hitch Recreation Park
Cemetery
Snake Hill
FIGURE 1


PROPERTY LINE
QUASSAICK CREEK
S-7
E-1
S-8
E-1 NEW
WAREHO NO.1
EW -0
EW -1
FORMER FUETRON BUILDING
NO.4 PULLING BLDG.
NO.1 MAIN MILL
GALLONS
ATING BASIN
TABLE
WAGON SHED
0 30 60
Approximate scale in feet
NO.1-A HARDENING BUILDING
NO.5
Fleming Lee Shue
Environmental Management & Consulting
158 West 29th Street, 9Fl.
New York, NY 10001
AFFCo
New Windsor, NY
FIGURE 1
EXTENT OF DEMOLITION AND EXCAVATION
Date
July 2007
Project Number
10000
LEGEND
Extent of Building Demolition
Area of Excavation
Property Line
Retaining Walls
Bedrock Well Locations
Monitoring Well Locations
Former Production Wells
Existing Soil Vapor Extraction Wells