

April 1, 2008

File No. 147-76601

Mr. Michael MacCabe, Senior Environmental Engineer  
NYS Department of Environmental Conservation  
Division of Environmental Remediation  
625 Broadway  
Albany, New York 12233-7016

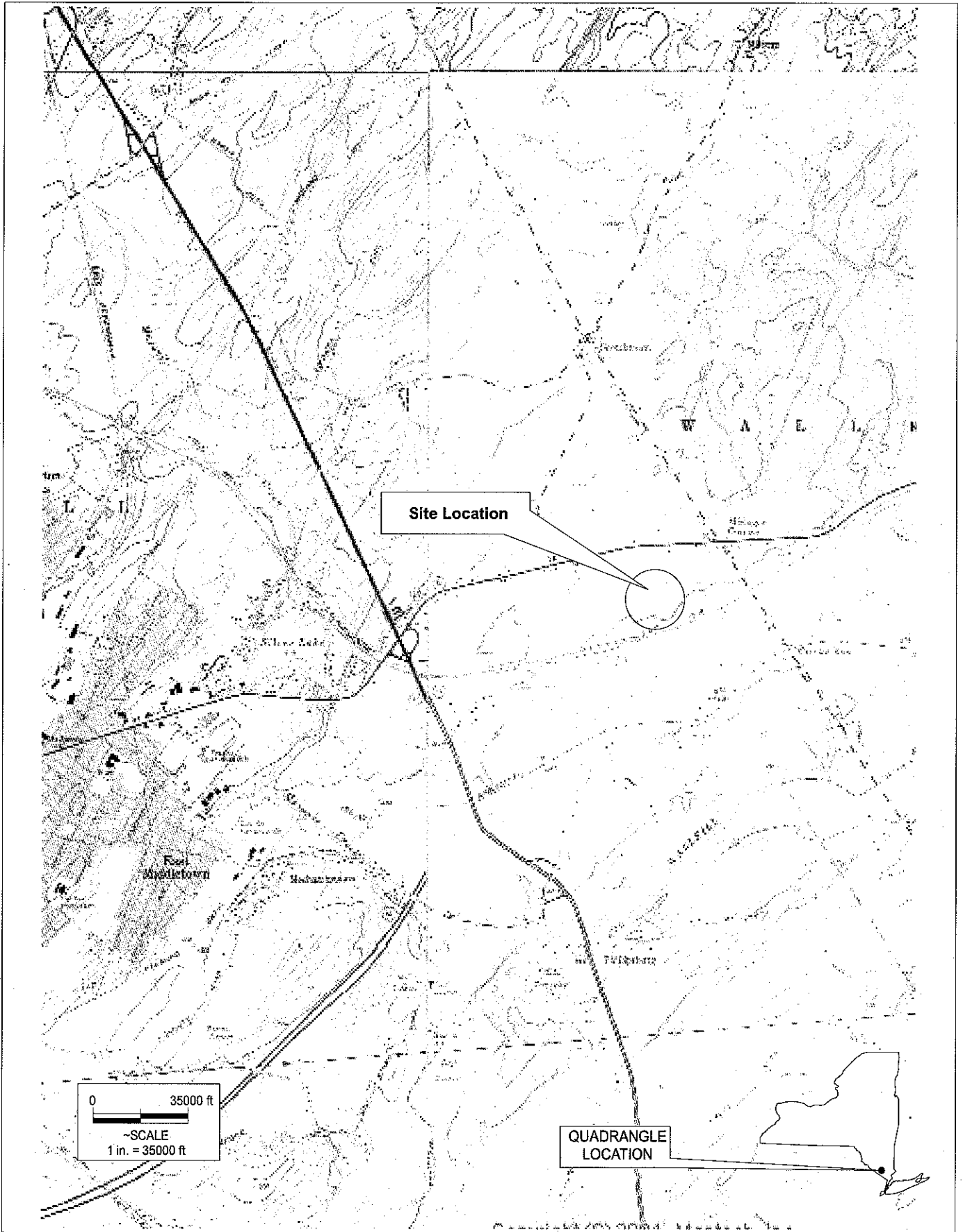
**Re: IRM System #2 Closure Sampling Plan  
tesa tape, Inc., Middletown Facility  
NYSDEC Site #3-36-56  
Order of Consent (Index #W3-0780-96-12 & W3-0906-02-07)**

Dear Mr. MacCabe:

On behalf of tesa tape Inc., (tesa) HDR is submitting this Closure Sampling Plan to perform confirmatory soil sampling at the former tesa facility located in Middletown, NY (Figure 1). The purpose of this plan is to describe the environmental sampling that will be conducted to confirm that the remedial action objectives have been achieved for the two areas of concern (AOC) associated with the on-going interim remedial measure (IRM) at System #2 for the former solvent storage building and the loading dock AOC (Figure 2).

### ***Background***

The solvent storage building and loading dock AOC IRM are under a routine operation and maintenance phase to address past accidental releases of toluene. Specifically an Air Sparge/Soil Vapor Extraction (AS/SVE) remediation system (System #2) was installed in August 2002 and operated to mitigate impacts of toluene at the two remaining AOCs. Additionally, approximately 20 cubic yards of toluene impacted soils were removed from the loading dock prior for the installation of the existing loading dock ramp and the AS/SVE piping. When tesa sold the facility in 2006 part of the sale agreement included removal of the solvent storage structure and associated decommissioned tanks. This activity did not interfere with the operation of the system since the buildings secondary containment was left in



Source Goshen, NY Quadrangle, 1957



Henningson, Durham & Richardson  
 Architecture and Engineering, P.C.  
 in association with HDR Engineering, Inc.  
 One Blue Hill Plaza  
 Pearl River, NY 10965

**Site Location**

tesa tape Inc. • Middletown, New York

**Figure 1**

place. Once the structure and tanks were removed the containment was backfilled to grade and the area repaved and left in its present state.

Since start-up of System #2 soil gas concentrations were evaluated by collecting soil vapor from individual vapor extraction lines which were analyzed by trained personnel using HDRs' mobile gas chromatograph (GC). As illustrated by the accompanying graphs (Graphs 1 and 2), reported toluene concentrations have been diminishing over time to levels less than 1 ppm/V suggesting that the soil remedial action objectives have been achieved (toluene concentration of 1.5 mg/kg or less). The ongoing groundwater monitoring program also indicates that the groundwater remedial action objective for toluene (5 µg/L) have been achieved since the on-site monitoring wells have been free of detectable concentrations of toluene since May 4, 2004 (1.8 µg/L at MW-5)

The system operation was cycled on and off and was monitored for rebound in September and December 2007. The September data indicated that toluene concentration rebound had not occurred as all sampling locations had reported concentrations that were less than 0.1 ppm/V. The second sampling round in December indicated some low levels of toluene persisted, however these concentration changed little in magnitude and are not considered significant and confirmatory soil sampling is recommended. The historical soil gas data can be found in Table 1.

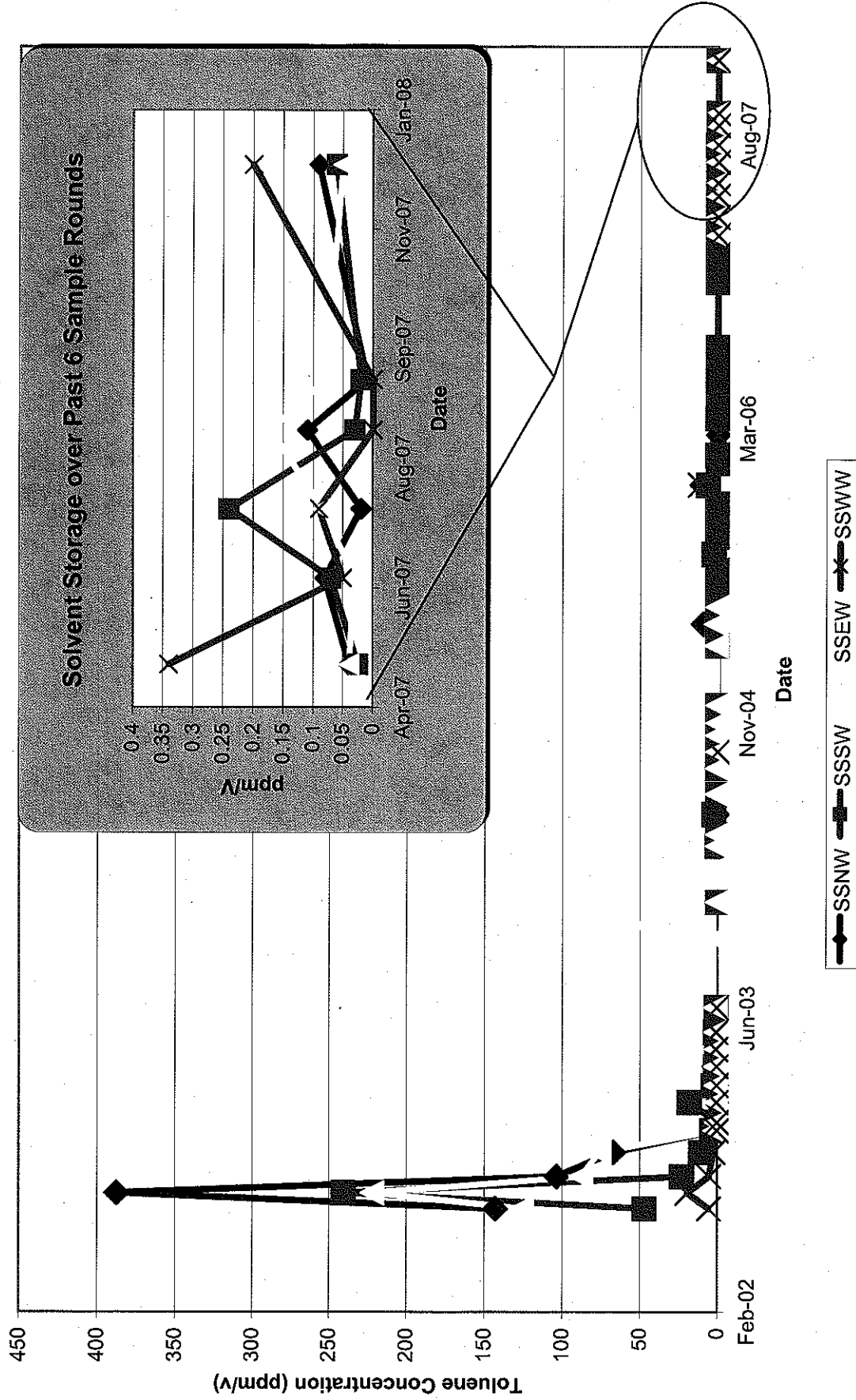
#### ***Site Investigation – Solvent Storage Building***

Monitoring wells MW-7S and MW-7D are downgradient of the former solvent storage building. Toluene was last detected from these wells in February 2003 (1.4 µg/L in MW-7S) therefore this investigation will focus to the soils below the footprint of the former solvent storage building. To confirm that the remedial action objectives for the soils have been achieved a total of eight borings (SSCS-01 to SSCS-08) will be completed at the former solvent storage building (Figure 2). Two borings will be advanced along each of the former buildings secondary containment sidewalls per section 3.9.subsection 6.1i of DER-10. In order to avoid damage to the remedial system piping the boring locations will be off-set approximately 4 feet towards the interior of the containment as shown on Figure 2.

Prior to completing the soil borings a diamond bit core drill will be used to core a four to eight inch hole through the slab of the former building. The soil borings will then be advanced past the slab using 3 ¼ inch ID hollow stem augers until the saturated zone is encountered at between 6-10 feet below the existing ground surface. Continuous soil samples will be collected from beneath the former building slab and

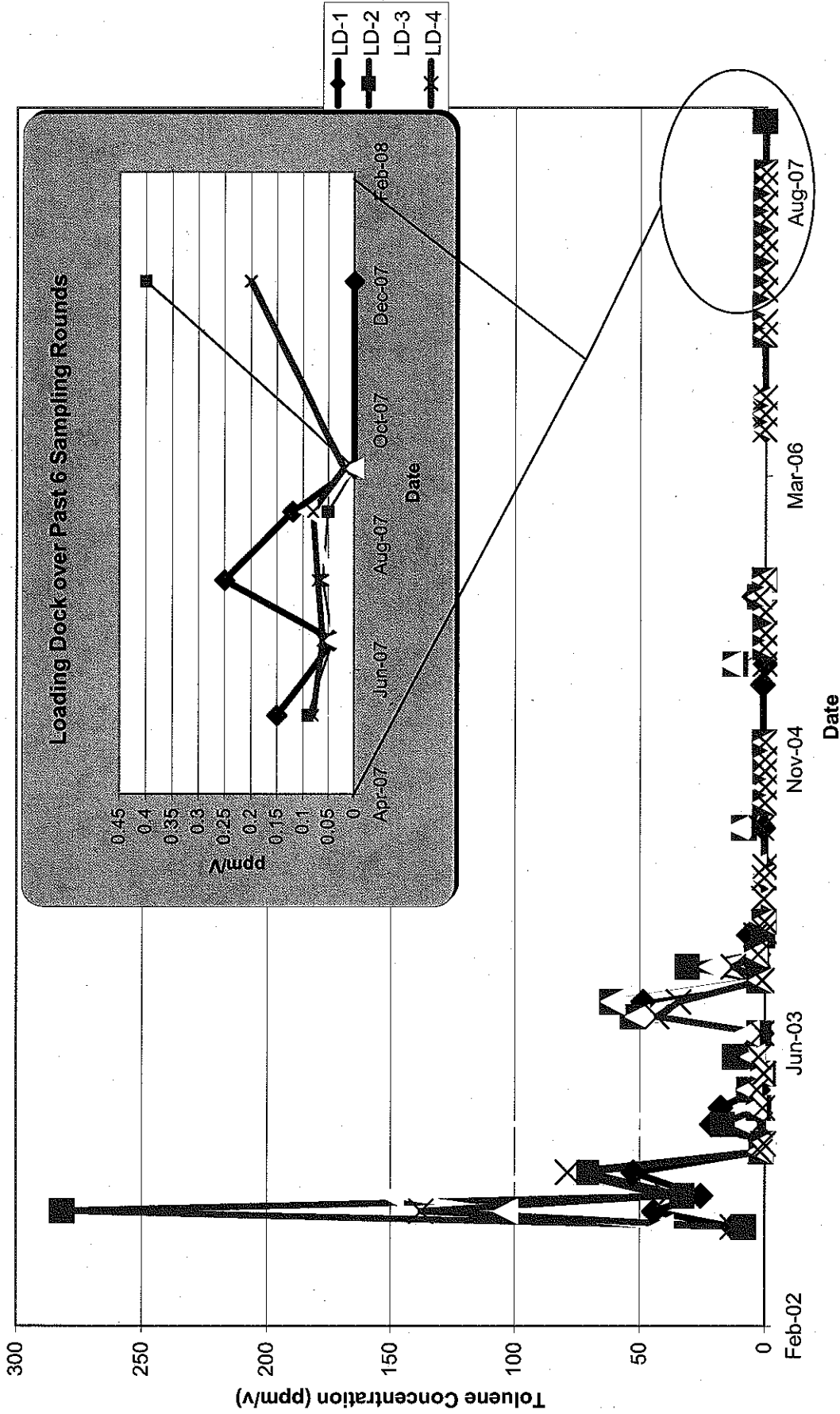
Tesa Tape IRM  
 Middletown, NY  
 NYSDEC Site # 3-36-056  
 Measured Toluene Concentrations Over Time  
 Graph 1

**Vapor Extraction Points - Solvent Storage**



Tesa Tape IRM  
Middletown, NY  
NYSDEC Site # 3-36-056  
Measured Toluene Concentrations Over Time  
Graph 2

### Vapor Extraction Points - Loading Dock



Tesa Tape IRM  
 Middletown, NY  
 NYSDEC Site # 3-36-056  
 Measured Toluene Concentrations of Soil Gas  
 Table 1 (Page1 of5)

Sample ID	8/8/2002		9/4/2002		10/13/2002		11/12/2002		12/19/2002		1/3/2003		2/5/2003		3/6/2003		4/7/2003		5/6/2003		6/4/2003	
	Soil Gas ppm/v	Dilution Factor	Soil Gas ppm/v	Dilution Factor	Soil Gas ppm/v	Dilution Factor	Soil Gas ppm/v	Dilution Factor	Soil Gas ppm/v	Dilution Factor	Soil Gas ppm/v	Dilution Factor	Soil Gas ppm/v	Dilution Factor	Soil Gas ppm/v	Dilution Factor	Soil Gas ppm/v	Dilution Factor	Soil Gas ppm/v	Dilution Factor	Soil Gas ppm/v	Dilution Factor
SSNW	143	1.1	387.7	1.1	103.8	1.1	67.2	1.1	1.5	1.1	0.2	1.1	0.5	1.1	0.7	1.1	1.9	1.1	0.3	1.1	1.0	1.1
SSSW	46.9	1.1	240.6	1.1	22.7	1.1	10.4	1.1	3.5	1.1	0.2	1.1	17.9	1.1	2.5	1.1	1.2	1.1	0.3	1.1	1.3	1.1
SSEW	126.1	1.1	222.2	1.1	88	1.1	76.1	1.1	1.5	1.1	0.4	1.1	0.9	1.1	0.8	1.1	1.1	1.1	0.5	1.1	1.0	1.1
SSWW	5.6	1.1	19.4	1.1	5.3	1.1	2.6	1.1	0.4	1.1	0.3	1.1	0.6	1.1	0.5	1.1	0.5	1.1	0.9	1.1	0.8	1.1
LD-1	12.7	1.1	44.3	1.1	25.6	1.1	52.5	1.1	1.2	1.1	0.2	1.1	21.1	1.1	17.6	1.1	2.8	1.1	0.6	1.1	9.7	1.1
LD-2	8.3	1.1	281.5	1.1	33	1.1	71.2	1.1	1.4	1.1	0.6	1.1	16.8	1.1	2.4	1.1	6.2	1.1	0.6	1.1	11.9	1.1
LD-3	41.2	1.1	103.6	1.1	149.5	1.1	80.4	1.1	1.6	1.1	0.5	1.1	96.7	1.1	4.3	1.1	6.1	1.1	1.8	1.1	4.8	1.1
LD-4	12.8	1.1	137.6	1.1	38.7	1.1	78.9	1.1	1.8	1.1	0.4	1.1	1.7	1.1	0.8	1.1	3.1	1.1	0.4	1.1	2.5	1.1
Discharge #2	130.6	1.1	NA	1.1	NA	1.1	NA	1.1	NA	1.1	NA	1.1	NA	1.1	NA	1.1	0.4	1.1	NA	1.1	NA	1.1

Note: The preceding data was screened using LMS's mobile GC.

Tesa Tape IRM  
 Middletown, NY  
 NYSDEC Site # 3-36-056  
 Measured Toluene Concentrations of Soil Gas  
 Table 1 (Page2 of5)

Date Collected	7/16/2003	8/14/2003	9/9/2003	9/10/2003	11/10/2003	12/2/2003	1/5/2004	1/29/2004	3/6/2004	4/15/2004	5/6/2004	6/12/2004
Matrix	Soil Gas	Soil Gas	Soil Gas	Soil Gas	Soil Gas	Soil Gas	Soil Gas	Soil Gas	Soil Gas	Soil Gas	Soil Gas	Soil Gas
Units	ppm/v	ppm/v	ppm/v	ppm/v	ppm/v	ppm/v	ppm/v	ppm/v	ppm/v	ppm/v	ppm/v	ppm/v
Dilution Factor	1:1	1:1	1:1	1:1	1:1	1:1	1:1	1:1	1:1	1:1	1:1	1:1
<b>Sample ID</b>												
SSNW	1.0	Closed	Closed	Closed	Closed	Closed	Closed	Closed	Closed	0.3	<0.1	0.5
SSSW	0.8	Closed	Closed	Closed	Closed	Closed	Closed	Closed	Closed	0.2	<0.1	2.2
SSEW	1.2	24.6	19.7	20.1	1.0	46.9	0.5	0.5	0.5	0.2	<0.1	37.1
SSWW	0.5	Closed	Closed	Closed	Closed	Closed	Closed	Closed	Closed	Closed	Closed	Closed
LD-1	1.3	52.5	48.8	2.4	3.1	2.8	6.4	0.2	0.2	0.7	0.4	<0.1
LD-2	2.4	52.9	61.3	2.3	31.0	3.4	0.9	0.2	Closed	Closed	Closed	0.3
LD-3	7.1	50.9	60.9	1.5	21.2	4.2	24.9	0.7	0.4	1.4	4.4	0.2
LD-4	1.2	43.2	34.5	1.1	12.6	2.7	3.8	0.2	0.5	0.3	<0.1	0.1
Discharge #2	NA	NA	66.3	6.0	NA	NA	NA	0.2	NA	NA	NA	21.7

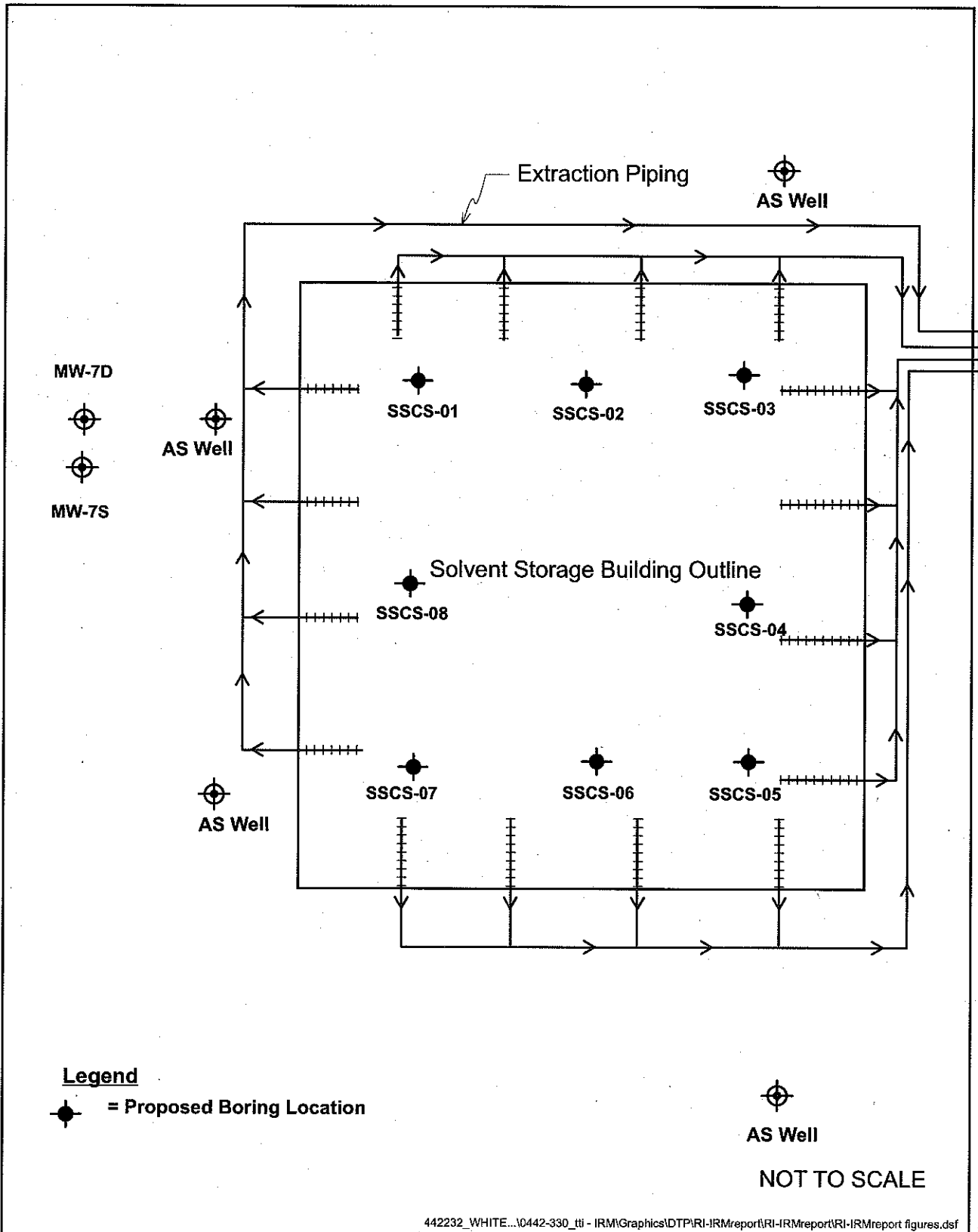
Tesa Tape IRM  
 Middletown, NY  
 NYSDEC Site # 3-36-056  
 Measured Toluene Concentrations of Soil Gas  
 Table 1 (Page 3 of 5)

Sample ID	7/12/2004		8/29/2004		9/22/2004		10/20/2004		11/11/2004		12/10/2004		1/11/2005		3/21/2005		4/28/2005		5/27/2005		6/20/2005		7/27/2005	
	Date Collected	Soil Gas	Soil Gas	Soil Gas	Soil Gas	Soil Gas	Soil Gas	Soil Gas	Soil Gas	Soil Gas	Soil Gas	Soil Gas	Soil Gas	Soil Gas	Soil Gas	Soil Gas	Soil Gas	Soil Gas	Soil Gas	Soil Gas	Soil Gas	Soil Gas	Soil Gas	Soil Gas
Matrix	ppm/v	ppm/v	ppm/v	ppm/v	ppm/v	ppm/v	ppm/v	ppm/v	ppm/v	ppm/v	ppm/v	ppm/v	ppm/v	ppm/v	ppm/v	ppm/v	ppm/v	ppm/v	ppm/v	ppm/v	ppm/v	ppm/v	ppm/v	ppm/v
Units	1:1	1:1	1:1	1:1	1:1	1:1	1:1	1:1	1:1	1:1	1:1	1:1	1:1	1:1	1:1	1:1	1:1	1:1	1:1	1:1	1:1	1:1	1:1	1:1
Dilution Factor	1:1	1:1	1:1	1:1	1:1	1:1	1:1	1:1	1:1	1:1	1:1	1:1	1:1	1:1	1:1	1:1	1:1	1:1	1:1	1:1	1:1	1:1	1:1	1:1
SSNW	0.33	0.09	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	0.11	0.11	ND	ND	ND	ND	0.2	0.2	9.8	0.2	<0.1	<0.1	<0.1	<0.1	<0.1	0.11
SSSW	<0.1	0.11	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	ND	ND	<0.1	0.2	0.2	1.2	1.2	0.2	0.2	0.2	<0.1	<0.1	<0.1	<0.1
SSEW	0.3	0.14	<0.1	<0.1	<0.1	<0.1	0.14	0.14	<0.1	<0.1	<0.1	<0.1	<0.1	0.82	0.82	1.1	1.1	0.14	0.14	0.14	Closed	Closed	Closed	Closed
SSWW	Closed	Closed	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	Closed	Closed	<0.1	<0.1	Closed	Closed	Closed	Closed	Closed	Closed	0.12
LD-1	0.8	0.06	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	1.1	1.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1
LD-2	8.2	0.11	NA	NA	NA	NA	<0.1	<0.1	<0.1	<0.1	0.2	0.2	ND	Closed	Closed	12	12	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1
LD-3	10.7	0.07	0.18	0.18	0.18	0.18	<0.1	<0.1	0.17	0.17	ND	ND	ND	Closed	Closed	14	14	<0.1	<0.1	<0.1	<0.1	<0.1	0.12	0.12
LD-4	1.56	0.07	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	ND	ND	<0.1	Closed	Closed	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1
Discharge #2	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	-0.1	-0.1	NA	NA	NA	NA	NA	NA

Tesa Tape IRM  
 Middletown, NY  
 NYSDEC Site # 3-36-056  
 Measured Toluene Concentrations of Soil Gas  
 Table 1 (Page4 of5)

Sample ID	8/23/2005		9/22/2005		10/18/2005		11/18/2005		12/19/2005		1/25/2006		2/8/2006		3/14/2006		4/11/2006		5/10/2006		6/14/2006	
	Soil Gas ppm/v 1:1	Soil Gas ppm/v 1:1	Soil Gas ppm/v 1:1	Soil Gas ppm/v 1:1	Soil Gas ppm/v 1:1	Soil Gas ppm/v 1:1	Soil Gas ppm/v 1:1	Soil Gas ppm/v 1:1	Soil Gas ppm/v 1:1	Soil Gas ppm/v 1:1	Soil Gas ppm/v 1:1	Soil Gas ppm/v 1:1	Soil Gas ppm/v 1:1	Soil Gas ppm/v 1:1	Soil Gas ppm/v 1:1	Soil Gas ppm/v 1:1	Soil Gas ppm/v 1:1	Soil Gas ppm/v 1:1	Soil Gas ppm/v 1:1	Soil Gas ppm/v 1:1	Soil Gas ppm/v 1:1	Soil Gas ppm/v 1:1
SSNW	2.5	Closed	0.2	0.19	10.4	0.2	0.07	0.2	0.07	0.07	0.2	0.07	0.07	0.07	0.07	0.07	0.07	0.27	0.06	0.06	0.06	Closed
SSSW	2.4	0.21	0.15	0.12	6.4	0.08	0.09	0.08	0.09	0.09	0.08	0.09	0.09	0.09	0.09	0.09	0.09	0.12	0.07	0.07	0.07	0.165
SSEW	Closed	Closed	Closed	Closed	Closed	Closed	Closed	Closed	Closed	Closed	Closed	Closed	Closed	Closed	Closed	Closed	Closed	Closed	Closed	Closed	Closed	Closed
SSWW	2.6	0.31	0.21	Closed	11.5	0.1	0.2	0.1	0.2	0.2	0.1	0.2	0.2	0.2	0.2	0.2	0.2	0.09	0.11	0.11	0.11	<0.1
LD-1	4.5	<0.1	<0.1	Closed	Closed	Closed	Closed	Closed	Closed	Closed	Closed	Closed	Closed	Closed	Closed	Closed	Closed	Closed	Closed	Closed	Closed	<0.1
LD-2	2.3	0.29	Closed	Closed	Closed	Closed	Closed	Closed	Closed	Closed	Closed	Closed	Closed	Closed	Closed	Closed	Closed	Closed	Closed	Closed	Closed	Closed
LD-3	2.4	0.6	Closed	Closed	Closed	Closed	Closed	Closed	Closed	Closed	Closed	Closed	Closed	Closed	Closed	Closed	Closed	Closed	Closed	Closed	Closed	<0.1
LD-4	2.3	0.33	Closed	Closed	Closed	Closed	Closed	Closed	Closed	Closed	Closed	Closed	Closed	Closed	Closed	Closed	Closed	Closed	Closed	Closed	Closed	<0.1
Discharge #2	NA	0.11	0.29	0.35	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.05	NA	NA	NA	NA





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recovered soil samples will be screened with a Photoionization Detector (PID). Each boring will be logged by an HDR geologist/environmental scientist and the boring logs will include a description of the soil types, PID screening results, depth to water, sample depth interval, soil moisture content, soil color, and field observations.

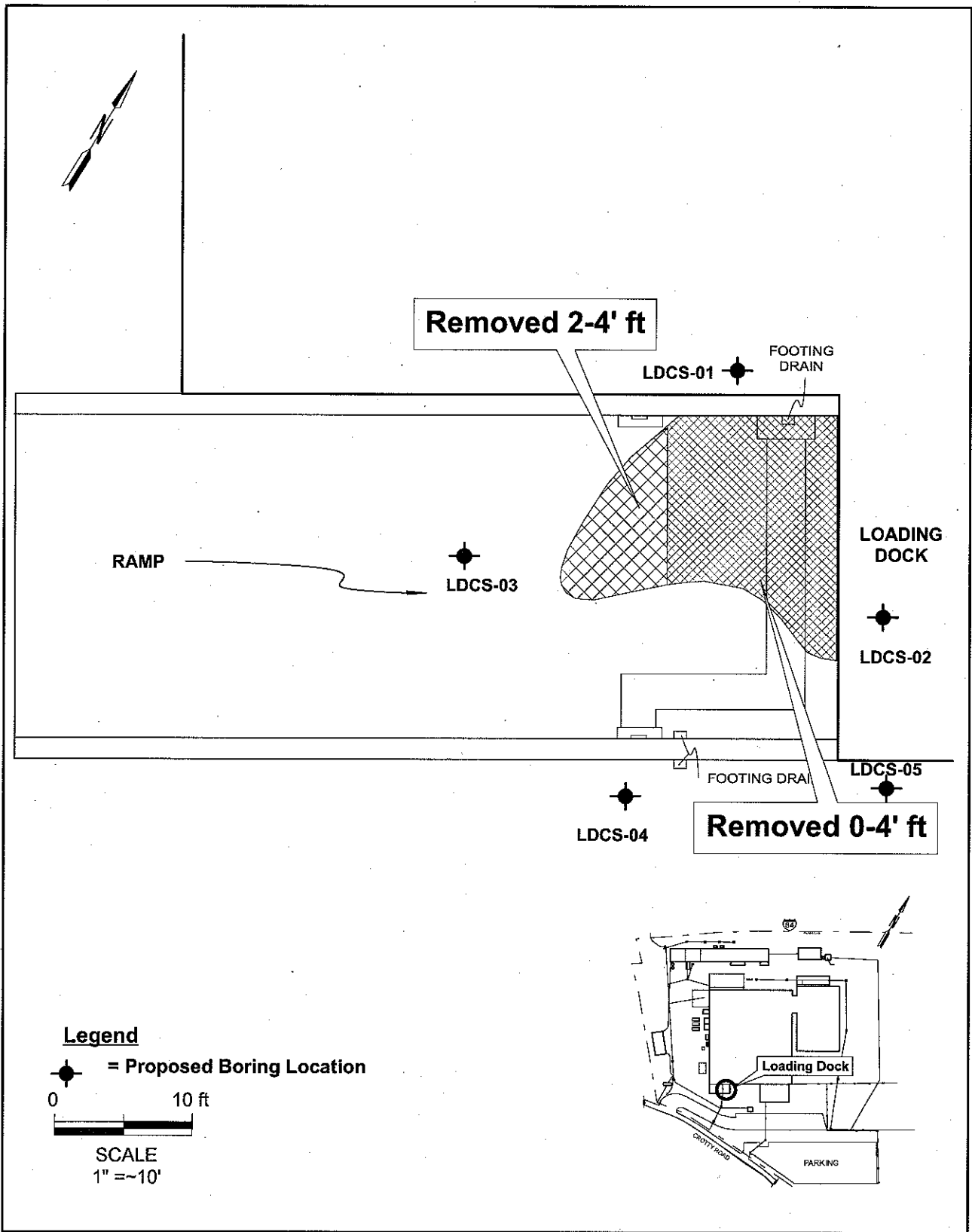
Soil from each bore hole will be collected for VOC analysis using USEPA method 8260. The sample will be collected from either the interval with the greatest PID reading or the water interface zone. The samples will be shipped under Chain of Custody (COC) protocols to an ELAP certified laboratory with standard turnaround time.

#### ***Site Investigation – Loading Dock***

A total of 5 confirmatory borings will be conducted in the vicinity of the loading dock AOC (Figure 3). Since the groundwater table is relatively shallow at the bottom of the loading dock ramp the two borings closest to the ramp bottom (LDCS-01 and -02) will be placed within the adjacent building rather than within the dock. A third boring will then be completed on the ramp just west of the limits of the former soil removal (LDCS-03). The remaining two boring will be located downgradient and outside of the dock just south of the dock (Figure 3).

LDCS-01 and LDCS-02 will be advanced by hand inside the building adjacent to the loading dock. One sample will be collected north of the loading dock and the second sample will be collected east of the loading dock. Borings will be advanced by coring the concrete floor with a 2-inch diamond concrete bit. The core will be removed and a large bore hand sampler will be advanced to refusal. Due to the soil density and hardness beneath the slab HDR expects the hand borings to be advanced to 2-4 feet bgs. Soils will be logged and sampled as described above. Because it is unlikely groundwater will be encountered soil samples will be collected from the location with the greatest PID reading or the bottom of the borehole.

LDCS-03 to LDCS-05 will be completed with standard hollow stem augers or a direct push probe unit and each of the borings will be advanced and sampled continuously until the watertable is encountered. The soil samples collected from the loading dock AOC will also be analyzed for VOC using USEPA method 8260 after the samples are shipped under COC protocols to an ELAP certified laboratory.



Henningson, Durham & Richardson  
Architecture and Engineering, P.C.  
In association with HDR Engineering, Inc.  
One Blue Hill Plaza  
Pearl River, NY 10965

**Loading Dock Soil Excavation  
and Proposed Boring Location**  
tesa tape Inc. • Middletown, New York

**Figure  
3**

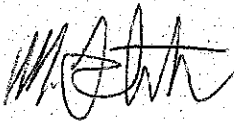
***System #2 Closure Reporting & Recommendations***

Following receipt of the final analytical data package, HDR will submit a letter report detailing the confirmatory sampling, field procedures and a summary of analytical data. Soil sampling analytical data will be compared to the established remedial action objectives for this site. Included in this letter report will be copies of the boring logs, figures illustrating final sampling locations, analytical summary tables, the analytical laboratory data package and conclusions/recommendations for the Site.

Should the analytical data confirm that the remedial action objectives have been reached, HDR will recommend suspending operation of System #2 and then properly abandon and remove the system from the site.

Please contact me if you have any questions.

Sincerely,



Michael D. Lehtinen  
Project Manager

cc: R. Pergadia, NYSDEC Region 3  
R. Rusinko, Region 3 Suboffice  
J. Obermeyer, NYSDOH  
S. Fein, Esq., Whiteman, Osterman & Hanna  
C. Rigano, tesa tape  
D. Speciner, Alston & Bird