April 13, 2020

Mr. Stephen G. Malsan
New York State Department of Environmental Conservation
Division of Material Management
625 Broadway
Albany, NY 12233-7256
via Electronic Mail

Re: Central Hudson Gas & Electric Corporation
Eltings Corners Facility: Route 299 & South Street, Highland, NY 12528
6NYCRR Part 373 – Updated Closure Plan
NYS DEC Hazardous Waste Permit No. 3-5132-00032-2
EPA ID No. NYD000705905

Dear Mr. Malsan:

An updated Closure Plan for the Central Hudson Gas & Electric (CHGE) Eltings Corners Facility in Highland, NY is enclosed for review. The Closure Plan has been revised as discussed during a telephone conference call between New York State Department of Environmental Conservation (NYSDEC) and CHGE representatives on March 24, 2020. Additionally, the enclosed plan has been prepared in accordance with 6 NY-CRR 373-2.7.

A second topic discussed during this conference call was the infrequent generation of hazardous waste that is non-routine for the Facility. CHGE continually seeks to limit the generation of hazardous waste. As such, CHGE does not expect additional quantities of one-time wastes such as the D035 material to be generated and does not seek to incorporate them into the Permit at this time.

Finally, CHGE desires to continue operating the Facility under the existing Part 373 Permit and respectfully requests written approval of said Permit extension in accordance with the State Administrative Procedures Act (SAPA) as discused.

We sincerely appreciate the time you and others from the NYSDEC have dedicated to answering our questions with regard to the Permit and Closure Plan. If you have any questions or require any further information from CHGE, please feel free to contact me at (845) 486-5734.

Respectfully,

Eric K. Chastain, PE
Environmental Coordinator

e-CC: Ms. Lynn Winterberger, NYSDEC
Ms. Maryanne O'Connor, NYSDEC
Mr. Wayne Mancroni, CHGE
Mr. Mark McLean, CHGE
Ms. Karen Lo, CHGE
CHGE e-file

284 South Avenue
Poughkeepsie, NY 12601
Phone: 845-486-5734
Fax: 845-486-5984
echastain@cenhud.com

Central Hudson Gas and Electric Corporation

Eltings Corners Facility
Route 299 & South Street
Highland, NY 12528

6 NY-CRR Part 373 Permit
NYSDEC Hazardous Waste Permit: 3-5132-00032-2
EPA ID No. NYD000705905

Attachment VII
Closure Plan and Financial Requirements

April 2020

Contents

Enclosed: Attachments VII-A1, VII-A2, VII-B1, VII-B2, VII-C1, VII-C2, VII-D

VII-1. Introduction

This section is submitted in accordance with the requirements of 6 NY-CRR 373-2.7(b) through (f) and 6 NY-CRR 373-2.8(c). This plan provides all steps required to close the facility at any time during its intended operating life. Post closure is not required as this is a storage facility and no disposal occurs at the site.

VII-2. General Facility Information

A. Facility Operational Information

Facility Name:	Eltings Corners (EPA ID No. NYD000705905)
Facility Address:	Route 299 & South Street, Highland, NY 12528
Owner/Operator:	Central Hudson Gas & Electric Corporation 284 South Avenue, Poughkeepsie, NY 12601
Facility Contact:	Christopher Capone Executive Vice President & CFO (845) 486-2000
Designated Site Coordinator:	Dan Casella; Operations Supervisor – Warehouse
Alternate Site Coordinator:	Rotating schedule of supervisors and foremen
Existing Permits:	NYSDEC Article 27 Part 364 Permit No. 3A-083 SPDES Permit No. NY0148849 USEPA HWSA Permit No. NYD000705905 NYSDEC PBS Permit No. 3-167052
Plot Plan:	Part 373 Attachment XII, Figure 1-1

B. Facility Description

Eltings Corners is a vehicle maintenance and warehouse facility for Central Hudson Gas & Electric Corporation (CHGE). Site activities include vehicle maintenance, transformer repair and storage, and warehouse distribution for major electrical components. As part of the warehouse operation, the facility has been designated as the central hazardous waste storage facility for wastes generated by the various Operating Divisions.

The hazardous waste storage facility consists of the following:

a. Secure section of a 40 by 60 feet steel building. The fully enclosed storage area is 37' 6" by 20' 0", less a 6' 6" by 4' unbermed section with a net floor area of 724 square feet (ft^2).
b. One above ground 6,000-gallon steel tank used for storage of PCB contaminated transformer oil.
c. Designated area in the Transformer Shop for the accumulation of small quantities of PCB debris (rags, absorbents and test kits).

VII-3. Maximum amount of Waste Storage at the Time of Closure

A. Container Storage Area

The maximum area available for waste storage in the contained area of the metal building is 37.5 feet by 20.0 feet by 4.0 feet or 724 ft^2. The hazardous waste may be stored in 55 or 85 gallon drums or wooden/cardboard fiber boxes. A total of 130 55-gallon drums of waste, stacked two high, could be stored in the area while maintaining a minimum aisle space of 30 inches for providing adequate access for inspection. This is equivalent to 7,150 gallons of hazardous waste (130x55).

B. Vehicle Maintenance Garage and Transformer Repair Shop

Ignitable solvents may be used for parts cleaning in the vehicle maintenance garage. Containers of ignitable solvents will be recycled by approved disposal vendors.
Polychlorinated biphenyls from electrical equipment may be generated at the Transformer Shop and will be placed in storage either in the container storage area or in the aboveground storage tank.

C. Transformer Oil Tank

The working capacity of the aboveground oil storage tank is 5,853 gallons.

D. Waste Inventory

The estimate of the maximum amount of wastes that can be stored in both the container storage area and bulk storage tank is 12,550 gallons or 102,910 pounds.

VII-4. Closure Process

A. Notification of Closure

CHGE will submit the Notice of Intent to Close to EPA and the Commissioner of the NYSDEC in accordance with 373-2.7(c)(4) and will close the facility within the time allowed by 373-2.7(d).

B. Certification of Closure

CHGE will maintain a copy of the approved closure plan and all approved revisions at the facility until the certificate of closure completeness has been submitted and accepted by the NYSDEC according to 373-2.7(f)(1). Within 60 days of completion of final closure, CHGE will submit to the commissioner of NYSDEC, by registered mail, a certification that the facility has been closed according to the approved plan. The certification will be signed by an officer of the company and a registered independent professional engineer registered in New York State with documentation supporting the certification.

C. Closure Performance Standard

This plan provides procedures to close the facility in such a manner as to require no maintenance and control beyond closure. The plan procedures are designed to control, minimize or eliminate threats to the human health or the environment and to the extent necessary avoid the release of hazardous waste and hazardous constituents to the soil, groundwater, surface water or the atmosphere.

D. Maximum Waste Inventory

The closure and financial plans assume that 130 55-gallon drums of PCB liquid waste (7,150 gallons) and 5,853 gallons of bulk PCB liquid waste in a storage tank will be on hand at the time of closure.

E. Inventory Removal

During closure, an activity schedule will be prepared for the final inventory to be shipped. A shipment schedule will also be prepared for anticipated shipments of all waste and equipment; future wastes will be removed and shipped off-site within 90 days of generation.

F. Closure Plan Components

The components of the closure plan include the systematic removal and disposal of hazardous waste and equipment. It is the intent to use an environmental spill response contractor, under the supervision of company personnel, for all closure operations, as the contractor has the personnel, training and equipment needed to perform all closure tasks.

Any contaminated soil or groundwater discovered will be removed and disposed of at an authorized facility. Additionally, all equipment used in closure process will be properly decontaminated and wastes will be disposed of appropriately.

Empty drums may result from the activities of bulking liquid waste for off site disposal. These drums will be verified as empty per 40CFR Part 261.7 and 6 NY-CRR 371.1(f). All empty drums will be sent to a drum reconditioner or will be disposed of at an authorized disposal facility. A few may be reused for containing decontamination residuals.

1. Closure of the designated permitted waste storage area

All wastes will be removed from the storage area and from the site by authorized vendor. The steps for the decontamination of the storage area will include:

a. Scrubbing (and other applicable methods) using a 10% solution of cleaner, such as EnviroClean (or equivalent) will be used at a rate of 10% volume of the object to be cleaned.
b. Scrubbing (and other applicable methods) using a 5% by weight solution of Trisodium phosphate (or alternate) cleaning agent. Scrub brushes will be used on all secondary containment, dikes and walls to a height of 6 feet and lower.
c. Steam cleaning of the walls from a level of 6 feet and lower, all floors, docks and dikes.
d. Collecting residuals from steam cleaning to be analyzed for disposal purposes.

In addition to the residuals being sampled for disposal purposes, samples will also be obtained to confirm that the area was properly cleaned and decontamination efforts were effective. Samples will be obtained from:

Sample Location(s)	**Sample Type(s)**
Inside Building Wall	3 Wipe Samples (Ground, 3 feet, 6 feet)
Inside Building- Berm	3 Wipe Samples (Outside, top, inside)
Inside Building-Bay Door	3 Wipe Samples (Ground, 3 feet, 6 feet)
Inside Building-Floor of Bermed Area	12 Wipe Samples
Inside Building-Floor of Bermed Area	1 Rinsate Sample
Inside Building-Underneath Floor of Bermed Area [**Note: if contaminated material is found to be beneath the floor additional samples will be obtained**]	1 Soil Sample (Around Plugged Drain in Floor within 1 foot of the surface)
Outside Building	1 Soil Sample (In front of bay door and outside of small door entrance to area)

Refer to **Attachment VII-A1** for a sampling map and **Attachment VII-A2** for photos of the sampling locations

2. Closure of the aboveground 6,000-gallon steel oil storage tank

If entry is required, Occupational Safety and Health Administration's (OSHA) Confined Space Entry Protocols will be followed. Non sparking tools and equipment will be used during cleanup and decontamination activities. Procedures will include provisions for no open flames, hot surfaces or smoking in and around the work area. The estimated surface area of the PCB-contaminated oil tank is approximately 523 ft^2. There are three independent areas that are adjacent and make up this permitted area of the Eltings Corners facility:

a. Area 1: Tank

The steps for the decontamination of the PCB-contaminated oil tank will include:

i. 6,000-gallon PCB contaminated oil tank will be emptied by an authorized handler.
ii. Interior will be triple-rinsed with a solution of EnviroClean (or alternate cleaning agent/method) and water in accordance with 40 CFR 761.
iii. A 10% solution of Enviroclean (or alternate cleaning agent) will be used at a rate of 10% volume of the object to be cleaned.
iv. Interior of the tank will be rinsed with water and steam cleaned.
v. Visual inspections will be conducted to confirm the decontamination was effective.
vi. All rinsate will be pumped or vacuumed into an appropriate storage contained for disposal.
vii. Any residuals from steam cleaning will be collected and analyzed for disposal purposes.

In addition to the rinsate being sampled for disposal purposes, samples will also be obtained to confirm that the area was properly cleaned and decontamination efforts were effective. Samples will be obtained from:

Sample Locations	**Sample Type(s)**
Inside Tank Walls	3 Wipe Samples (Ground, 3 feet, 6 feet)
Inside Tank Floor	2 Wipes

Refer to **Attachment VII-B1** for a sampling map and **Attachment VII-B2** for photos of the sampling locations

b. Area 2: Loading/Unloading Area

The steps for the decontamination of the loading/unloading secondary containment area (bermed area) will include:

i. All equipment to be salvaged will be cleaned externally, and in the case of some equipment such as pumps and tanks, internally with a 5% by weight of trisodium phosphate solution (or alternate cleaning agent/method) by recirculation. Salvaged equipment will be cleaned to meet the standards of EPA's Debris Rule.
ii. All operational areas will be scrubbed using a 10% solution of Enviroclean (or alternate cleaning agent) will be used at a rate of 10% volume of the object to be cleaned.
iii. All operational areas will be scrubbed with a 5% by weight of trisodium phosphate solution (or alternate cleaning agent/method). Scrub brushes will be used on all secondary containment, dikes and walls to a height of 6 feet and lower.
iv. Surfaces, such as walls from a level of 6 feet and lower, floors, docks and dikes will be steam cleaned.
v. Visual inspections will be conducted to ensure decontamination methods were effective.
vi. Any residuals after steam cleaning will be collected and analyzed for disposal purposes.

In addition to the residuals being sampled for disposal purposes, samples will also be obtained to confirm that the area was properly cleaned and decontamination efforts were effective. Samples will be obtained from:

Sample Locations	Sample Type(s)
Berm Wall	3 Wipe Samples (Outside, top, inside)
Floor of Bermed Area	12 Wipe Samples
Tank Input	1 Wipe Sample
Outside Unloading and Loading Area	3 Soil Samples (in front of PCB-contaminated oil tank, entry into the loading and unloading area, adjacent to the leach field)

Refer to **Attachment VII-B1** for a sampling map and **Attachment VII-B2** for photos of the sampling locations

c. Area 3: Structure

The steps for the decontamination of the structure covering the loading/unloading secondary containment area will include:

i. Scrubbing (and other applicable methods) using a 10% solution of cleaner, such as EnviroClean (or equivalent) will be used at a rate of 10% volume of the object to be cleaned.
ii. Scrubbing (and other applicable methods) using a 5% by weight solution of Trisodium phosphate (or alternate cleaning agent). Scrub brushes will be used on all secondary containment, dikes and walls to a height of 6 feet and lower.
iii. Steam cleaning of the walls from a level of 6 feet and lower, all floors, docks and dikes.
iv. Visual inspections will be conducted to ensure decontamination methods were effective.
v. Any residuals after steam cleaning will be collected and analyzed for disposal purposes.

In addition to the residuals being samples for disposal purposes, samples will also be obtained to confirm that the area was properly cleaned and decontamination efforts were effective. Samples will be obtained from:

Sample Location	Sample Type
Steel Support	3 Wipe Samples (Bottom of Steel Support, 3 feet, 6 feet)

Refer to **Attachment VII-B1** for a sampling map and **Attachment VII-B2** for photos of the sampling locations.

3. Closure of the designated PCB storage area in the transformer shop

An area in the transformer shop has been designated to accumulate small quantities of PCB debris. All wastes will be removed from the designated storage area and from the site by authorized vendor. The steps for the decontamination of the storage area will include:

a. Scrubbing (and other applicable methods) using a cleaner, such as EnviroClean (or equivalent).
b. Scrubbing (and other applicable methods) using a 5% by weight solution of Trisodium phosphate (or alternate cleaning agent). Scrub brushes will be used on all secondary containment, dikes and walls to a height of 6 feet and lower.
c. Steam cleaning of the walls from a level of 6 feet and lower, all floors, docks and dikes.
d. Any residuals from steam cleaning will be collected and analyzed for disposal purposes.

In addition to the residuals being samples for disposal purposes, samples will also be obtained to confirm that the area was properly cleaned and no contamination remains. Samples will be obtained from:

Sample Locations	Sample Type
Building Wall	3 Wipe Samples (Ground, 3 feet, 6 feet)
Floor Area In front of storage area	1 Wipe Sample

Refer to **Attachment VII-C1** for a sampling map and **Attachment VII-C2** for photos of the sampling locations.

4. Closure of the PCB Soaking Tank

The PCB soaking tank will be properly decommissioned. The steps for the decontamination of the soaking tank will include:

a. The soaking tank solution will be drained and treated as non-hazardous. If the solution results indicate the PCB concentration is below 2ppm, the solution may be reused.
b. Samples will be obtained to confirm the soaking tank solution is non-hazardous and the interior of the tank contains no contamination. Additionally, the sample results will determine the disposal methods.

Samples will be obtained from:

Sample Locations	Sample Type
PCB Soaking Tank Solution	1 Liquid Sample
Tank Wall	3 Wipe Samples
Tank Floor	1 Wipe Sample

VII-5. Sample Collection

The Toxic Substances Control Act (TSCA) Subpart G-Polychlorinated Biphenyls (PCB) Spill Cleanup Policy (40 CFR 761.130) grid sampling method will be utilized to confirm the area was properly decontaminated. All analytical data will be reported in a Level "B" format and an electronic copy will be made available to the Department for review upon request.

A. Sampling Protocol for Rinsate

The *NYSDEC's Rinsate Sample Collection and Analysis protocol* will be used to obtain representative samples for analysis from concrete floors, secondary containment areas and sumps, including surfaces that have been coated. This procedure may also may also be suitable for use on other surfaces on a case-by-case basis.

1. Create an exclusion zone with colored (e.g., yellow) ribbon to keep extraneous personnel from entering area.
2. Sketch the area to be sampled. Sketches should include locations of building columns, walls, fixed equipment and the proposed rinsate sampling locations themselves (to accurately locate the rinsate sampling points within the buildings) for Department concurrence. The sample locations must be chosen to include any areas of staining, discoloration or other evidence of spills. The sample locations will be approved by a NYSDEC staff person usually on site on the day of sampling (unless NYSDEC chooses not to be present or state that such approval is not needed). Each sample location should be approximately 2,500 cm^2 (50 cm by 50 cm) or 400 in^2 (20 in by 20 in), but size may be adjusted to the extent necessary to accommodate field conditions with NYSDEC approval.
3. Assemble and clean all equipment necessary for sample collection. Equipment needs to be cleaned, if not already pre-cleaned by the laboratory.

4. Create a temporary containment area on the storage zone floor using an inert, clean or cleaned, flexible boom (e.g., water filled polyethylene tube, nonabsorbent spill containment berm), if necessary. If the floor is relatively level and water will puddle without flowing out of the sample location, a boom may not be necessary.
5. Label the sample containers with a unique sample code, information on the site, sample locations and the date and time samples were collected. Affix appropriate labels for test parameters on the sample containers. Put on a new pair of disposable nitrile gloves.
6. De-ionized water is to be used for this protocol. The de-ionized water may be provided by the laboratory. For each sampling location, start with two liters or 2-quarts of de-ionized water to allow for the collection of a sufficient sample size for all of parameters to be tested for, as specified by the laboratory, including Quality Control (QC) samples. If necessary, additional de-ionized water may be used, but no more than the minimum amount needed to provide a sufficient sample size. Record the temperature of the room and of the de-ionized water. At each sampling location, slowly pour the de-ionized water onto the surface to be sampled. A clean/cleaned wash bottle may be utilized to cover the area uniformly with the de-ionized water. If the individual area is sloped, start pouring at the highest elevation. Record the volume of de-ionized water used for each sample location.
7. Allow de-ionized water to collect and remain in the sample location for 10-minutes.
8. For each sampling location, collect the number and type of samples as specified by NYSDEC along with appropriate Quality Assurance (QA)/QC samples. Samples shall be collected using dedicated, sterile glass pipettes provided by the laboratory. The pipettes will be used to transfer the sample fluids into the appropriate bottles provided by the laboratory. Volatile sample bottles shall be filled first to minimize loss of volatiles. Record the volume of water collected for each sample for each sample location.
9. Samples must not be composited.
10. Cap the sample containers and place them in a laboratory cooler with ice to maintain a temperature of 4ºC.
11. Measure the exact wetted area for each sampling location sampled using a tape measure or other suitable device. Place all measurements and the sketch of the area in the site field book. Measurements should include all appropriate or unusual conditions observed while collecting each sample (i.e., drainage patterns followed, stained areas present, condition of the storage zone floor, etc.).
12. Remove and discard the gloves. Place all disposable gloves into a plastic bag designated for proper disposal.
13. Enter information on procedures followed including details of samples and sampling in the field book. Photographs of the sample locations, wetted areas, equipment, and actual sampling events may be taken by the facility or Department staff and a list of the photographs shall be recorded in the field book.
14. Fill out chain-of-custody forms. Prepare the samples for storage and shipping in laboratory cooler with sufficient ice to maintain a temperature of 4ºC. Ship overnight to the laboratory for analysis.
15. Follow chain-of custody procedures as detailed in the QA Program Plan identified by the selected authorized vendor.

B. Sampling Protocol for Wipe Test

Wipe samples results will be used to identify if nay contamination remains after the decontamination process has been completed. This procedure may also may also be suitable for use on other surfaces on a case-by-case basis. Wiping only gives an indication of surface contamination which can easily be removed. Components with a large amount of strongly entrained residuals might need to be scraped with a paint scraper and the scraping analyzed.

1. Assemble all equipment necessary for wipe sample collection
2. Create an exclusion zone with yellow ribbon in accordance with the project Health and Safety Plan to keep extraneous personnel from entering area.
3. A 10-centimeter by 10-centimeter area will be measured and marked off prior to sampling. Tape the template in place (the template should be made of, or coated with, an inert material such as Teflon). Layout sample grids on area of concern using tape measure and appropriate markers that will not contaminate the samples
4. Follow the wipe sample procedure at each sample location.
    a. Put on a new pair of disposable gloves.
    b. A 3-inch by 3-inch gauze pad will first be soaked with 5 to 10 milliliters of appropriate solvent/de-ionized water for metals. Alternatively, Whatman 40 ashless, Whatman “50" smear tabs, or equivalent can be used. The wipes and the liquid used to wet the wipes should be tested for residual metals before use in taking samples.
    c. Open the sealed sample vial containing the pre-soaked gauze pad, and remove the pad with forceps.
    d. Collect sample by applying pressure to the wipe pad and drawing it in straight, even strokes, moving from left to right in the area designated, and slightly overlapping adjacent strokes. Upon completion of wiping left to right, the wipe effort is repeated by evenly drawing the pad over the area from top to bottom starting in the upper left hand corner (this second wiping is at a 90° angle to the first wipes and should provide a thorough wiping of the entire area).
    e. Let the gauze air dry.
    f. Fold the dry gauze (samples side inward) and place it in the sample vial using the forceps.
    g. At least one blank sample per sampling day must be prepared.
    h. Cap the sample vial.
    i. Label the sample vial with a unique sample code, information on the site, sample location and date/time sample was collected.
    j. Mark on sample vials or appropriate label for other parameters and place sample vial in an ice chest. A sample temperature of approximately 4°C must be maintained.
    k. Remove and discard the gloves. Place all disposable gloves and wiping clothes into a plastic bag designated for proper disposal.
    l. Fill out sampling details in field book
    m. Clean the template thoroughly between samples by rinsing with solvent and wiping.
    n. Fill out chain-of-custody forms and prepare the samples for storage and shipping by packing in laboratory cooler with ice to maintain a temperature of 4°C. Ship overnight or have a courier to the laboratory for analysis.
    o. Follow chain-of-custody procedures as detailed in the QA Program Plan identified by the selected authorized vendor.

C. Sampling Protocol for Soil Test

1. Assemble all equipment necessary for wipe sample collection
2. Create an exclusion zone with yellow ribbon in accordance with the project Health and Safety Plan to keep extraneous personnel from entering area.
3. Assemble and clean all equipment necessary for sample collection. Equipment needs to be cleaned, if not already pre-cleaned by the laboratory. Stainless steel trowels and hand auger soil borings are to be used to collect samples (Sample collection will be performed by the designated laboratory and in accordance with the lab QA/QC protocols)
4. Using the trowel and hand auger, dig down to just above the water table
5. Obtain sample and place into specimen container
6. Cap the sample container
7. Label the sample vial with a unique sample code, information on the site, sample location and date/time sample was collected.
8. Mark on sample vials or appropriate label for other parameters and place sample vial in an ice chest. A sample temperature of approximately 4°C must be maintained.
9. Remove and discard the gloves. Place all disposable gloves and wiping clothes into a plastic bag designated for proper disposal.
10. Fill out sampling details in field book
11. Fill out chain-of-custody forms and prepare the samples for storage and shipping by packing in laboratory cooler with ice to maintain a temperature of 4°C. Ship overnight to the laboratory for analysis.
12. Follow chain-of-custody procedures as detailed in the QA Program Plan identified by the selected authorized vendor.

VII-6. Sample Analysis

All samples will be analyzed by a laboratory certified by New York State (NYS) Department of Health (DOH) Environmental Laboratory Approval Program (ELAP).

A. Sampling Parameters

Samples will be obtained after the completion of the decontamination processes will be used to ensure that:

1. Decontamination of area was effective.
2. If wastes were generated, waste classification for disposal purposes.

Laboratory analyses will include:

Analysis Parameter	**Sample Matrix**	**Sample Methodology**
Polychlorinated Biphenyls (PCBs)	Wipe/Liquid/Soil	EPA Method 8082
Semi Volatile Organic Compounds (SVOCs)	Liquid	EPA Method 8270
Volatile Organic Compounds (VOCs)	Liquid	EPA Method 8260
RCRA Metals	Wipe/Liquid/Soil	RCRA Metals (TCLP)
Flash Point	Liquid	SW 1010

All soil samples will be analyzed utilizing the Department's CP-51 Soil Cleanup Guidance. Sampling and analysis will be performed by a trained representative of a certified testing laboratory according to approved SW-846 procedures.

Wipe sample results will be interpreted as follows:

Concentration of wipe sample	Results
< 10 µg/100 cm^2	Non-PCB (<50 ppm)
>10 but <100 µg/100 cm^2	PCB-Contaminated (50-499 ppm)
≥100 µg/100 cm^2	PCB (≥500 ppm)

B. Target Detection Limits and QA/QC

The target detection limits for Target Compound List (TCL) volatiles and TCL semi-volatiles are 5 microgram per liter (ug/L). The target detection limits for the metals are as per the table from the NYSDEC Analytical Services Protocol. The quality control results shall be submitted along with the sample results. This QC data shall include surrogate recoveries, Matrix Spike (MS)/Matrix Spike Duplicate (MSD) percent recoveries, internal standard area counts and retention times (as applicable), and blank results for the organics.

For the metals, submit Contract Required Detection Limits (CRDL) standard for Atomic Absorption (AA) and Inductively Coupled Plasma (ICP), spike sample recovery, duplicates, blanks, ICP interference check sample, post digestion spike sample recoveries (if applicable), laboratory control sample results, and ICP serial dilution results. The QC analysis should be performed on site-specific samples. The QA/QC requirements of SW-846 shall be met.

VII-7. Amendment of Closure Plan

The closure plan will be amended by the owner or operator whenever changes occur that would affect the closure plan. This plan will be amended when there is a change in the expected year of closure. At a minimum the Closure Plan will be reviewed annually and amended if needed. Revised or updated closure costs will be submitted to the NYSDEC for approval, in accordance with 6 NY-CRR 373-2.7(c)(1).

VII-8. Assessment of Other Areas

CHGE has conducted several site assessments to determine potential impacts to soil, groundwater, and stormwater, based on findings of a Phase I Environmental Site Assessment in 2007. Results of the Phase II Limited ESA were reported on October 22, 2007. Results of a Supplemental Phase II Investigation were reported on February 22, 2008.

Results of a RCRA Facility Investigation were reported on April 15, 2009. Each of the potential Areas of Concern identified in the 2007 Phase I ESA have been investigated; no further investigation has been warranted.

Additionally, a wetland investigation and subsequent remediation were completed by CHGE from 2009 through 2019. Monitoring of the remediated area remains the only outstanding concern. Based on these investigations, there is no evidence that additional soil testing is necessary.

VII-9. Schedule of Closure

CHGE will submit the Notice of Intend to Close to EPA and the Commissioner of the NYSDEC in accordance with 373-2.7(c)(4) and will close the facility within the time allowed by 373-2.7(d).

The independent Professional Engineer (PE) will witness all closure activities, and provide a certification to the owner and the NYSDEC that all drums, tanks and structures are clean and decontaminated. CHGE will also provide the following documentation to the NYSDEC upon completion of closure:

A. Composite sampling results analyzed for PCBs;
B. Wipe test results for the tank, drums (if any), piping, fittings, valves, and secondary containment structures;
C. Test results of flush material;
D. A copy of all manifests used for the disposal of hazardous wastes as part of the Closure process (these documents will include the name and location of an approved TSD facility for the disposal of hazardous waste, and the name of the licensed waste transporter);
E. QA/QC records and data for all sampling and analysis. Analytical Data will be reported in a Level "B" format and an electronic copy made available to the Department for review upon request;
F. A description of any additional barriers constructed as part of the decontamination activities; and
G. The source and analysis of clean fill used to restore the facility following excavation if contamination is found.

VII-10. Future Use

The facility will continue to operate as a maintenance and warehouse facility for CHGE after closure. The tanks will be re-used for the storage of virgin transformer oils; the container storage area will be used to store equipment.

VII-11. Cost Estimate for Closure

CONTAINER STORAGE AREA

Activity	Unit Cost	Total
Inventory Disposal		
130 Drums (various waste streams)	Maximum of $600/drum	$ 78,000
Trips to various waste disposal facilities (dependent on waste stream)	Estimated four trips at a maximum of $2,500/trip	$ 10,000
Labor	2 Operators - $500/day	$ 1,000
Equipment	2 Operating Days – Loader - $500/day	$ 1,000
		Subtotal - $ 90,000
Decontamination Costs		
Laborer	2 men, 3 days - $600/man/day	$ 3,600
Engineer	1 man, 2 days - $2200/man/day	$ 4,400
Operator	1 man, 0.5days – $700/day	$ 350
		Subtotal - $ 8,350
Equipment	Safety equipment - $100/laborer/day	$ 600
	Loader - $360/day	$ 360
	Flush Cleaner (5 gallons) - $25/gallon	$ 125
	Disposable clean-up equipment - $300	$ 300
	Laborer for flush cleaner disposal (1 operator/day)- $ 600day	$ 600
	Steam Cleaner- 1 day at $320/day	$ 320
	Disposal of flush cleaner and water – 100 gallons x $9.75/gallon (Clean Harbors)	$ 975
	Disposal of debris/PPE (3 drums) - $600/drum	$ 1,800
	Transportation to Clean Harbors, PA 1 trip * 7,900/trip	$ 7,900
		Subtotal - $ 12,980
Laboratory Analysis	PCB wipe samples (26 samples) - $75/sample 2 Co-located samples $75/sample 2 Field blank samples $75/sample	$ 2,250
	VOCs – 1 sample @ $140 1 Field blank sample $140/sample	$280
	SVOCs – 1 sample @ $225 1 Field blank sample $225/sample	$450
	Rinsate- 6 samples @ $685 1 Field blank sample $685/sample	5

	Field Technician- $645/day*3 days	$ 1,935
		Subtotal - $ 9,710
TOTAL CONTAINER STORAGE AREA CLOSURE COST - $ 121,040		

TANK STORAGE AREA		
Activity	Unit Cost	Total
Inventory Disposal		
6,000 gallons of oil	$ 9.75/gallon	$ 58,500
Transportation to disposal facility	Transportation: 1 trip * 7,900/trip	$ 7,900
Labor	1 man - $ 600/day	$ 600
		Subtotal - $ 11,589
Decontamination Costs		
Laborer	3 men, 3 days - $ 600/man/day	$ 5,400
Engineer	1 man, 3 days, $ 2,200/man/day	$ 6,600
Equipment	Safety equipment - $ 100/laborer/day	$ 900
	Vacuum Truck, 3 days @ $3,000/day	$ 9,000
	Flush Cleaner (68 gallons) – $ 25/gallon	$ 1,700
	Disposable clean-up equipment	$ 300
	Disposal of flush cleaner and water – 1000 gallons x $9.75/gallon (Clean Harbors)	$ 9,750
	Transportation to Clean Harbors, PA 1 trip * 7,900/trip	$ 7,900
	Laborer for flush cleaner disposal (2 operator/day)- $ 600/day	$ 1,200
	Pressure washer- 3 days at $110/day	$ 330
	Steam Cleaner- 3 days at $320/day	$ 960
		Subtotal - $ 44,040
Laboratory Analysis	PCB wipe samples (13 samples) - $225/wipe 1 Co-located sample $225/sample 1 Field blank sample $225/sample	$ 3,375
	Soil (PCBs) – 6 @ $225/sample 1 Field blank sample $225/sample	$1,575
	Rinsate - 5 samples @ $685; 1 Field blank sample $685/sample	$ 1,350

	Health and Safety Plan Development	$ 425
	Field Technician- $645/day*4 days	$ 25,180
		Subtotal - $ 31,905
		TOTAL TANK STORAGE CLOSURE COST - $ 87,534

PCB Soaker Tank		
Activity	Unit Cost	Total
	Disposal	
400 gallons solution	Disposal of solution – 400 gallons x $9.75/gallon	$ 660
Laboratory Analysis	solution (PCB's)- 1 sample @ $685	$ 685
		TOTAL PCB SOAKER TANK SOLUTION DISPOSAL COST - $ 1,345

Soil Disposal (if needed)		
Activity	Unit Cost	Total
	Disposal	
40 yards of soil	$ 225/yard (Veolia)	$9,000
Transportation to disposal facility	Transportation to EQ Michigan $ 5,000/trip (1 trip)	$5,000
Laboratory Analysis	Lump sum quote from contractor	$1,500
		TOTAL SOIL DISPOSAL COST - $ 15,500

Total Closure Cost Estimate

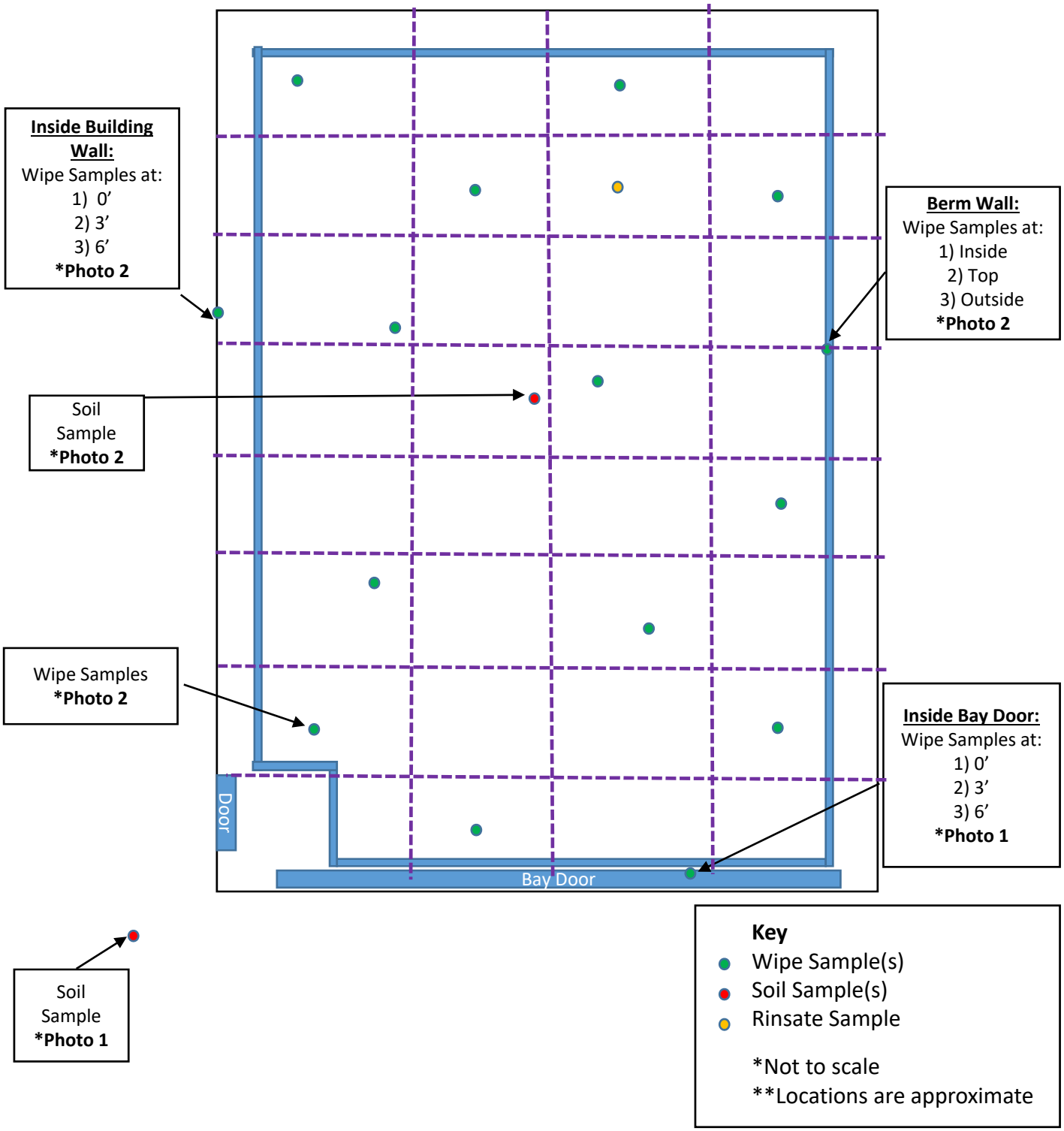
Sum Closure Costs	$ 225,419
Sum of Closure Costs plus fifteen (15) percent administrative cost	$ 259,232
Twenty (20) percent contingency of new total	$ 51,846
TOTAL CLOSURE COSTS FOR FACILITY (2019 Dollars)- $ 311,078	

TOTAL CLOSURE COSTS FOR FACILITY: $ 311,078

* This closure cost estimate equals or exceeds the cost at the point in the facility's operating life when the extent and manner of its operation would make closure the most expensive.

Proof of CHGE's financial assurance test is included as **Attachment VII-D**.

ATTACHMENT VII-A1
Eltings Corners Permitted Waste Storage Area Sampling Map



ATTACHMENT VII-A2
Photos of Eltings Corners Permitted Waste Storage Area Sample Locations

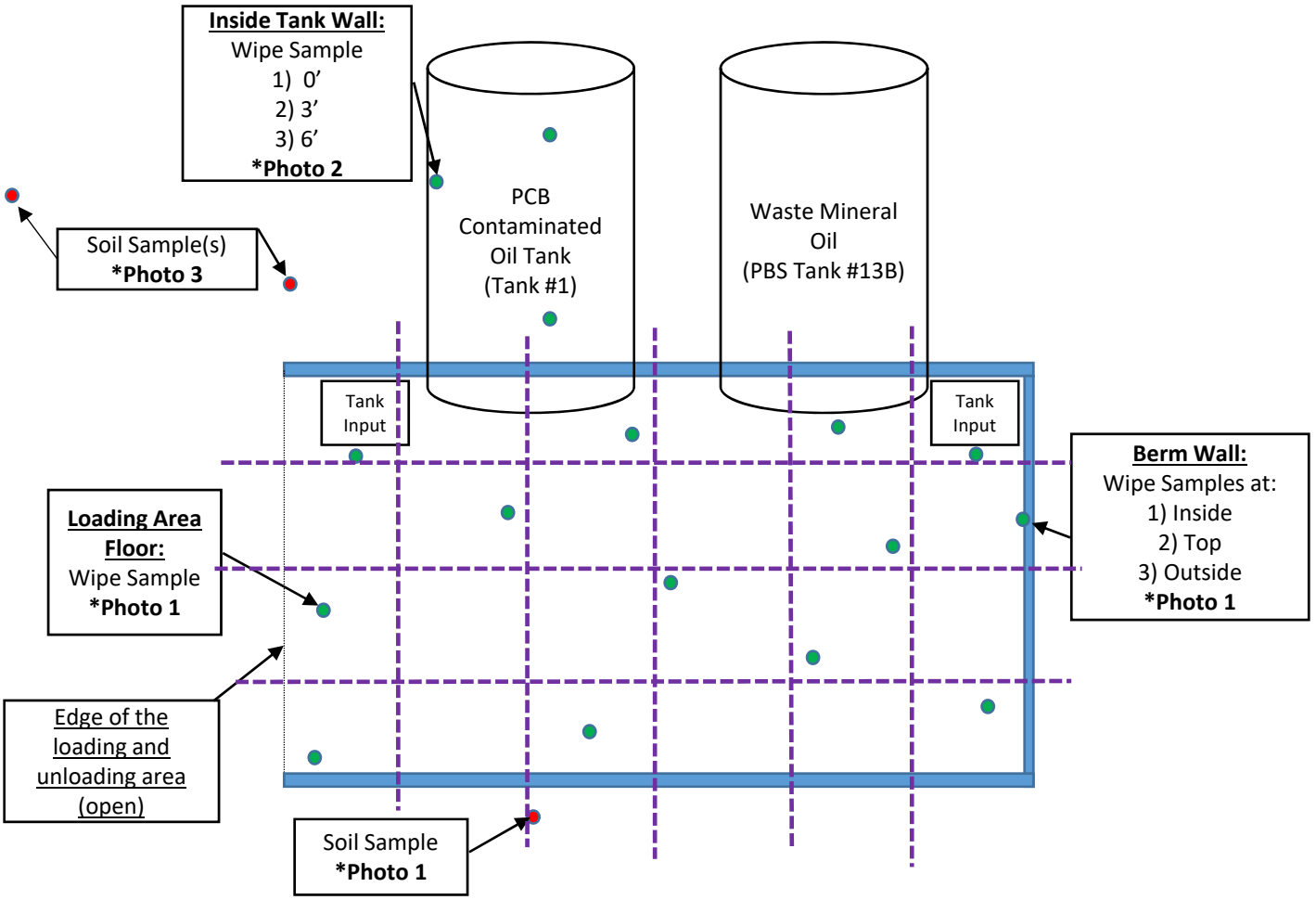
Permitted Storage Area- PHOTO 1

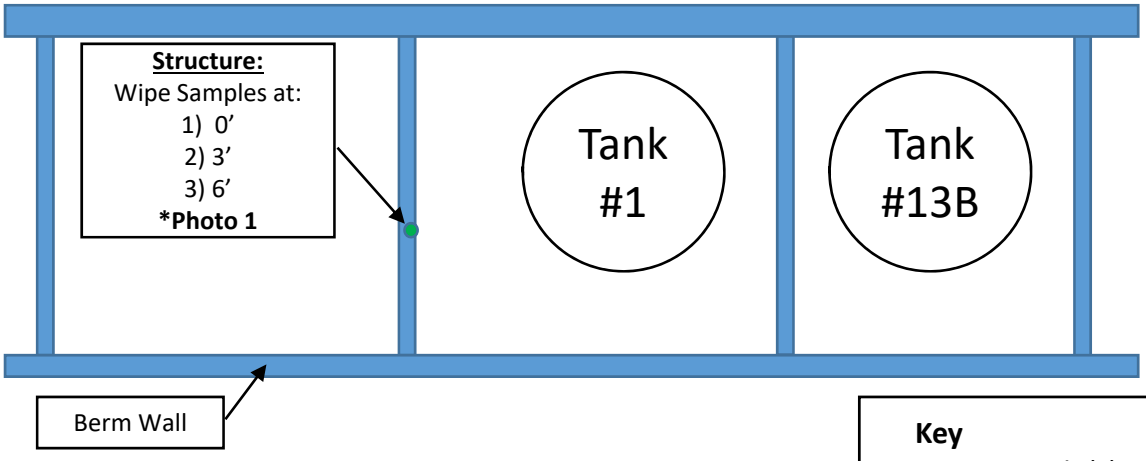
Permitted Storage Area- PHOTO 2

Key
- Wipe Sample(s)
- Soil Sample(s)
- Rinsate Sample

ATTACHMENT VII-B1

Permitted Aboveground 6,000-gallon Steel Tank Storing PCB-Contaminated Transformer Oil and Loading and Unloading Area





Key
- Wipe Sample(s)
- Soil Sample(s)

*Not to scale
**Locations are approximate

ATTACHMENT VII-B2

Photos of Permitted Aboveground 6,000-gallon Steel Tank storing PCB-Contaminated Transformer Oil and Loading and Unloading Sample Locations

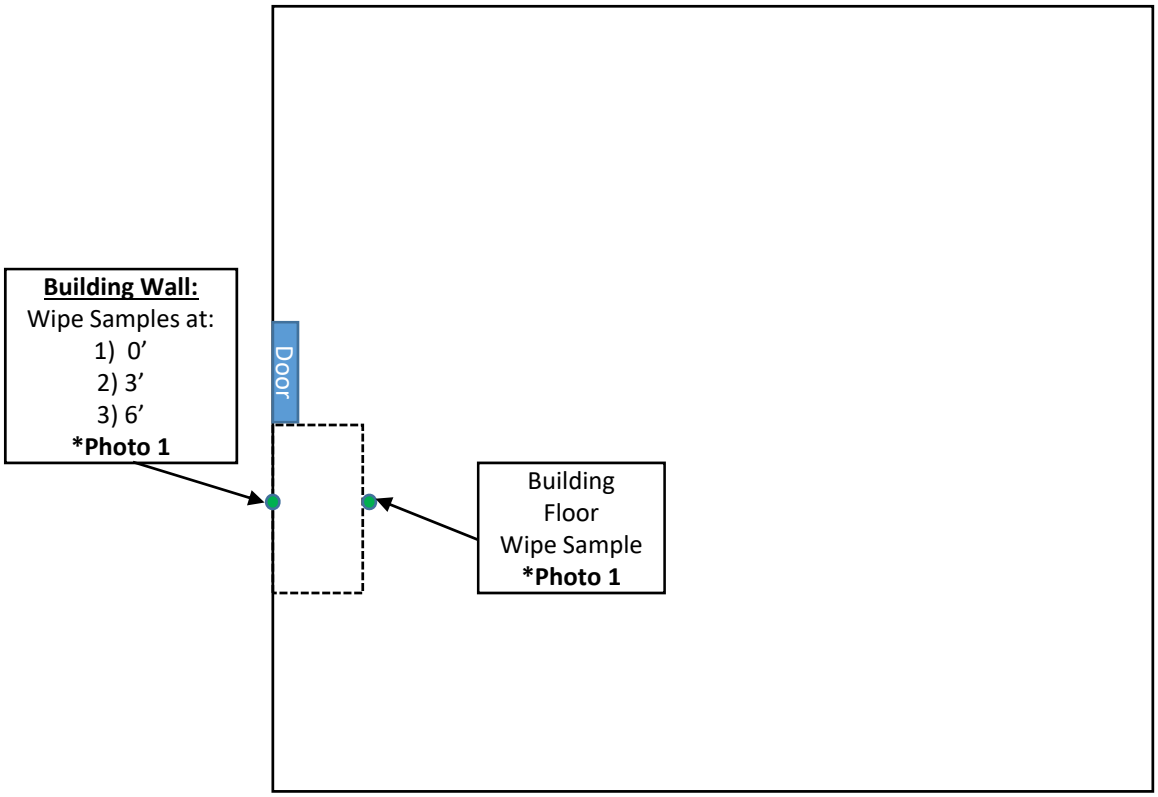
PCB-Contaminated Oil Tank and Loading and Unloading Area- PHOTO 1

PCB-Contaminated Oil Tank and Loading and Unloading Area- Area- PHOTO 2

PCB-Contaminated Oil Tank and Loading and Unloading Area- Area- PHOTO 3

Key
- Wipe Sample(s)
- Soil Sample(s)

ATTACHMENT VII-C1
Designated Area in Transformer Shop for Accumulations of Small Quantity of PCB Debris Sampling Map



Key
- Wipe Sample(s)
- Soil Sample(s)

*Not to scale
**Locations are approximate

ATTACHMENT VII-C2
Designated Area in Transformer Shop for Accumulations of Small Quantity of PCB Debris Sample Locations

Transformer Shop
Small Quantity
Storage Area-
PHOTO 1

Key
- Wipe Sample(s)

Attachment VII-D

Financial Assurance

Deloitte & Touche LLP
City Place I, 33rd Floor
185 Asylum Street
Hartford, CT 06103-3402
USA

Tel: +1 860 725 3000
Fax: +1 860 725 3500
www.deloitte.com

INDEPENDENT ACCOUNTANTS' REPORT ON APPLYING AGREED-UPON PROCEDURES

To the Management of
Central Hudson Gas & Electric Corporation

We have performed the procedures as specified by Title 6 of the Codes, Rules, and Regulations of the State of New York, Sections 373-2.8 and 373-3.8, which were agreed to by the New York State Department of Environmental Conservation ("NYDEC"), and Central Hudson Gas & Electric Corporation (the "Company"), related to the Company's compliance with the financial test option as of December 31, 2018, included in the accompanying letter dated March 30, 2020, ("Exhibit A"), from Christopher Capone, Chief Financial Officer of the Company. The Company's management is responsible for its compliance with those requirements. The sufficiency of these procedures is solely the responsibility of those parties specified in this report. Consequently, we make no representations regarding the sufficiency of the procedures enumerated below either for the purpose for which this report has been requested or for any other purpose.

The procedures we performed and related findings are as follows:

1. We confirm that we have audited the financial statements of the Company as of and for the year ended December 31, 2019 (the "Audited Financials") in accordance with the auditing standards of the Public Company Accounting Oversight Board (United States) and in accordance with generally accepted auditing standards as established by the American Institute of Certified Public Accountants and have issued our report dated February 12, 2020.

2. We agreed the amount appearing as "tangible net worth" (Item 7 on page 3 of Exhibit A) to a "D.E.C. Self Assurance Report" schedule prepared by the Company ("Exhibit B").

3. We determined that Exhibit B was mathematically correct. We make no comment as to the method or appropriateness of the calculation of "tangible net worth."

4. We determined that the amounts on Exhibit B were derived from financial records used to prepare the Audited Financials of the Company as of and for the year ended December 31, 2019.

5. We recalculated the Company's total assets located in the United States as of December 31, 2019 by subtracting the total assets located outside the U.S., as represented by management to be zero, from the total assets of the Company.

6. We compared the total assets of the Company to the financial statements of the Company as of December 31, 2019 and found such amounts to be in agreement.

7. We recalculated the percentage of total assets located in the United States by dividing total assets inside the U.S. as of December 31, 2019 by total assets as of December 31, 2019 and found it to be greater than 90%.

This agreed-upon procedures engagement was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants. We were not engaged to and did not conduct an examination or review, the objective of which would be the expression of an opinion or conclusion, respectively, on compliance with the financial test option in the accompanying letter dated March 30, 2020. Accordingly, we do not express such an opinion or conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

This report is intended solely for the information and use of the management of the Company and the specified parties listed in the first paragraph and is not intended to be and should not be used by anyone other than these specified parties.

Deloitte & Touche LLP

March 30, 2020

Christopher M. Capone, CFA
Executive Vice President
& Chief Financial Officer

People. Power. Possibilities.
Central Hudson
A FORTIS COMPANY

LETTER FROM CHIEF FINANCIAL OFFICER

March 30, 2020

Commissioner
New York State Department of Environmental Conservation
Division of Solid and Hazardous Materials
625 Broadway
Albany NY 12233

Dear Commissioner:

I am the Executive Vice President and Chief Financial Officer of Central Hudson Gas & Electric Corporation, 284 South Avenue, Poughkeepsie, New York, 12601. This letter is in support of the use of the financial test to demonstrate financial responsibility for liability coverage, post-closure care and/or corrective action care, as specified in 6 NYCRR 373-2.8 and 373-3.8.

The firm identified above is the owner or operator of the following facilities for which liability coverage for sudden accidental occurrences is being demonstrated through the financial test specified in 6 NYCRR-373-2.8 and 373-3.8:

EPA I.D. Number - NYD000705905
Central Hudson Gas & Electric Corporation
South Street
Highland, NY 12528

1. The firm identified above guarantees, through the guarantee specified in 6 NYCRR 373-2.8 and 373-3.8, liability coverage for both sudden and non-sudden accidental occurrences at the following facilities owned or operated by the following: NONE. The firm identified above is: NONE.

For facilities not located in New York, this firm is demonstrating liability coverage for both sudden and non-sudden accidental occurrences at the following facilities through the use of a test equivalent or substantially equivalent to the test specified in Subpart H of 40 CFR Parts 264 and 265: NONE.

Facility	Closure Cost	Corrective Action Cost
EPA I.D. Number - NYD000705905 Central Hudson Gas & Electric Corp. South Street Highland, NY 12528	$356,045	$2,242,642

284 South Avenue
Poughkeepsie, NY 12601

(845) 452-2000
Direct: (845) 486-5439
email: ccapone@cenhud.com
www.CentralHudson.com

2. The firm identified above guarantees, through the guarantee specified in 6 NYCRR 373-2.8 and 373-3.8, the closure and post-closure care or liability coverage of the following facilities owned or operated by the guaranteed party. The current cost estimates for the closure or post-closure care so guaranteed are shown for each facility:

   NONE

3. For facilities not located in New York, this firm is demonstrating financial assurance for the closure or post-closure care or liability coverage of the following facilities through the use of a test equivalent or substantially equivalent to the test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure or post-closure cost estimates covered by such a test are shown for each facility:

   NONE

4. The firm identified above owns or operates the following hazardous waste management facilities for which financial assurance for closure or, if a disposal facility, post-closure care, is not demonstrated either to EPA or New York or other states through the financial test or any other financial assurance mechanisms specified in Subpart H of 40 CFR Parts 264 and 265 or equivalent or substantially equivalent State mechanisms. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility:

   NONE

5. This firm is the owner or operator or guarantor of the following UIC facilities for which financial assurance for plugging and abandonment is required under 40 CFR Part 144 (see 6 NYCRR 370.1[e]) and is assured through a financial test. The current closure cost estimates as required by 40 CFR 144.62 are shown for each facility:

   NONE

Fortis Inc. (Fortis), completed the transaction to acquire CH Energy Group, Inc. (CH Energy Group), the parent company of this firm on June 27, 2013. As a result, CH Energy Group deregistered from the Securities Exchange Commission (SEC) on July 11, 2013 and therefore, this firm is no longer required to file a Form 10K with the SEC beginning fiscal year 2013.

The fiscal year of this firm ends on December 31. The figures for the following items marked with an asterisk are derived from this firm's independently audited, year-end financial statements for the latest completed fiscal year.

New York State Department of
Environmental Conservation

March 30, 2020

Part B. Closure, Post-Closure and/or Corrective Action Care and Liability Coverage

ALTERNATIVE II

1.	Sum of current closure, post-closure and/or corrective action cost estimates (total of all cost estimates listed above)	$2,598,687
2.	Amount of annual aggregate liability coverage to be demonstrated	$ 2,000,000
3.	Sum of lines 1 and 2	$ 4,598,687
4.	Current bond rating of most recent issuances and name of rating service	A- (stable) by S&P
5.	Date of issuance of bonds	October 28, 2019 October 28, 2019
6.	Date of maturity of bonds	October 28, 2049 October 28, 2059
*7.	Tangible net worth (if any portion of the closure, post-closure, and/or corrective action cost estimates is included in "total liabilities" on your financial statements, you may add that portion to this line)	$710,048,255
*8.	Total assets in the U.S. (required only if less than 90% of assets are located in the U.S.)	N/A

		YES	NO
9.	Is line 7 at least $10 million?	X	
10.	Is line 7 at least 6 times line 3?	X	
*11.	Are at least 90% of assets located in the U.S.? If not, complete line 12.	X	
12.	Is line 8 at least 6 times line 3?	N/A	

New York State Department of
Environmental Conservation

March 30, 2020

I hereby certify that the wording of this letter is identical to the wording specified in 6 NYCRR 373-2.8(j)(9), except for the addition of 'and/or corrective action,' as such regulations were constituted on the date shown immediately below.

(Signature)

Christopher M. Capone
Executive Vice President and
Chief Financial Officer

March 30, 2020

3/30/2020

Central Hudson Gas & Electric Corporation
D. E. C. Self Assurance Report
For 3/31/20 Filing
Deadline

	12/31/2019		12/31/2018		12/31/2017	
Tangible Net Worth:						
Total Proprietory Capital				PY 1		PY 2
PSC Balance Sheet A/C 201-216	$772,596,917		$696,900,420		$627,043,241	
Less: Intangible Plant (Per Intangibles Disclosure)		A7				
Common Plant	49,098,882		34,460,435		30,951,936	
Electric Plant	11,880,574		11,711,804		11,536,688	
Gas Plant	1,569,206		1,548,247		1,486,972	
Total Intangible Plant	62,548,662		47,720,486		43,975,596	
Tangible Net Worth	$710,048,255		$649,179,934		$583,067,645	
For Financial Responsibility Requirements for Underground Storage:						
Total Assets (PSC B/S):	$2,445,867,963	A1	$2,293,793,145		$2,170,823,062	
Less: Intangible Assets (from above)	62,548,662		47,720,486		43,975,596	
	2,383,319,301		2,246,072,659		2,126,847,466	
Liabilities:						
Long Term Debt	746,950,000	A1	673,950,000		598,950,000	
Current & Accrued	101,530,100	A1	98,044,792		82,105,854	
Deferred Credits	816,620,722	A*	819,727,413		858,026,656	
Operating Reserves	8,170,224	A1	5,170,520		4,697,311	
Total	1,673,271,046		1,596,892,725		1,543,779,821	
Net Tangible Assets	$710,048,255		$649,179,934		$583,067,645	
	0		0		0	Check - S/B 0

FAS B/S		
	818,238,894	A1
Asset Retirement Obligations (230.10)	634,527	
	818,873,421	
Accrued OPEB Liability - FAS 106 (253.18)	14,948,568	A2
Accrued Add'l OPEB Liability - SFAS 158 (253.19)	(27,462,407)	A3
kecs - Retirement Benefit Restoration Plan (253.21)	20,792,214	A4
Accrued Additional Pension Liability (253.22)	9,990,424	A5
Accrued Add'l Pension Liab - FAS 87 (253.78)	(20,521,498)	A6
	816,620,722	A*