January 14, 2022

Ms. Ruth Curley, P.E.
Division Environmental Remediation
New York State Department of Environmental Conservation
625 Broadway, 12th Floor
Albany, NY 12233-7016

Re: Proposed Corrective Measures Work Plan
Former Mohasco Mills Complex
Lyon Street & Forest Avenue
Amsterdam, New York
Site No. B-00052-4
LaBella Project No. 2203166

Dear Ms. Curley,

LaBella Associates, D.P.C. (LaBella) has prepared this Corrective Measures Work Plan (CMWP) on behalf of Sticker Mule LLC (Sticker Mule) for the Former Mohasco Mills Complex (Site). This CMWP is a supplemental document to the November 15, 2021 Periodic Review Report (PRR) for the Site covering the certification period from October 16, 2018 through October 16, 2021. A December 14, 2021 correspondence from the New York State Department of Environmental Conservation (NYSDEC) indicated that the November 15, 2021 PRR was rejected and that a CMWP including a schedule for completion of the work planned is required within 30-days of receipt of that letter.

This proposed CMWP addresses the following deficiency noted in the November, 2021 PRR:

- Disturbance of the soil cover that included a "sinkhole" identified during the August 2021 annual Site inspection.

BACKGROUND

According to the March, 2001 Record of Decision (ROD) for the Site, the Mohasco Mill Complex was a carpet manufacturing facility which operated from the late 1880s through 1984. The manufacturing processes conducted at the Site consisted primarily of milling and weaving of raw materials and dyeing operations. Carpet manufacturing ceased at the Site in 1984, after which time the Site was leased for use as storage and office space. In 1992 (and again in 1994) most of the buildings at the Site were destroyed by fires. The debris from the buildings destroyed by the fires was left on-Site and was used to backfill the building foundations.

The City of Amsterdam acquired the former Mohasco Mills property in 1994, a Site investigation was conducted under the New York State Environmental Restoration Program (ERP) and was completed in 2000. The findings identified semi-volatile organic compounds (semi-VOCs), metals, polychlorinated biphenyls (PCBs), and/or pesticides in Site soil in excess of the NYSDEC's soil cleanup objectives (SCOs) as specified in their Technical and Administrative Guidance Memorandum (TAGM No. 4046). Groundwater was found to contain low concentrations of Site related compounds at a few locations, but no plume (or pattern) of impacted groundwater was identified. Stream sediment samples collected

immediately downgradient of the Site identified elevated concentrations of selected semi-VOCs and the metals arsenic, lead and zinc.

A Record of Decision (ROD) was signed for the Site in March, 2001. The ROD called for removal of debris and impacted soil from the bank of the North Chuctanunda Creek, building demolition, and placement of a 2.0-foot thick cover of clean soil over areas of impacted soil and debris. The remedial design was subsequently approved in September 2005, and the Site was remediated in the summer and fall of 2006. NYSDEC placed an environmental easement on the property on April 20, 2011 and, a Certificate of Completion was awarded to the City of Amsterdam Industrial Development Agency in August 2011. The property was subsequently sold to the current owner, Sticker Mule, LLC (January 2019) and, the certificate of completion transferred to Sticker Mule LLC in July, 2019.

CORRECTIVE MEASURES WORK PLAN

The soil cover at the Site is part of the engineering controls (ECs) that are in place to prevent direct exposure to buried debris, soil containing polycyclic aromatic hydrocarbons (PAHs) and elevated metals concentrations in subsurface soils, as well as prevent the continued erosion of impacted Site soil into the North Chuctanunda Creek.

The soil cover at the Site is protected from disturbance via an April, 2011 environmental easement that serves as an institutional control for future Site use and development. The November 15, 2021 PRR noted a “sinkhole” in the northeastern portion of the Site in the area adjacent to Lyon Street and its intersection with Wilbur Street.

A Site inspection was conducted on August 23, 2021 by LaBella. During that inspection, soil cover was evaluated and generally observed to be in good condition and fully functional, except for a “sinkhole” that was noted in the northeastern portion of the Site in the area adjacent to Lyon Street and the intersection with Wilbur Street (Photograph 1).

Photograph 1:



The soil cover appears to have collapsed as result of the "sinkhole". Evidence of building debris (presumably from the 1992 or 1994 fires) can be observed in the "sinkhole". The demarcation fabric and soil cover are also present (Photograph 2).

Photograph 2:



PROPOSED CORRECTIVE MEASURE

The corrective measure proposed herein is to restore the Site to conformance with the Site Management Plan and other guidance for the Site administered by NYSDEC. The corrective measure is proposed for the "sinkhole" in the northeastern portion of the Site in the area adjacent to Lyon Street and its intersection with Wilbur Street.

Soil Cover

LaBella is proposing that the existing, caved-in demarcation (layer) fabric is cut back so that angular stone fill (6-inch (+/-) pieces) can be placed to fill the void space to the level of the textile fabric demarcation layer (2.0 feet from surface elevation). Then, the stone fill will be covered with similar fabric to match the existing demarcation layer. The textile fabric will be placed so that it overlaps the existing demarcation layer to ensure a cohesive demarcation layer and to prevent erosion. The demarcation layer will be covered with #2 gravel. Once the frost/heave cycles associated with winter-time subside, the condition of the backfilled "sinkhole" will be re-evaluated. If additional #2 gravel fill is needed, it will be added as appropriate, or conversely the #2 gravel fill will be removed to allow for the placement of approximately 6.0-inches of topsoil. The soil cover will be restored with topsoil and seeded to match surrounding conditions when weather permits at the start of the growing season.

The stone backfill will be virgin material from a permitted mine or quarry and contain less than 10% by weight material which would pass through a size 80 sieve. The topsoil will be procured from a commercial vendor. Since the quantity of topsoil required to restore the "sink hole" is anticipated to be less than five

(5) cubic yards, LaBella respectfully requests that the sampling requirements under NYSDEC DER-10 5.4 (e) be waived. However, if the topsoil required to provide final restoration exceed five (5) cubic yards, then the top soil will be sampled and analyzed in compliance with Table 5.4(e) 10.

LaBella will provide a summary of the restoration work within 45-days of completion. This summary will include quantities of the materials used to restore the soil cover system, photographs and observations made during this work.

PROPOSED WORK SCHEDULE

LaBella proposes that this work commence immediately upon approval by the NYSDEC. Sticker Mule's contractor will be responsible for the procurement of 6-inch stone fill, geotextile fabric (demarcation), #2 stone fill, and topsoil. Since the placement of topsoil and grass seed are more successful in spring-time conditions, these tasks will be deferred until then. LaBella will observe and document the restoration work and ensure compliance with this Corrective Measures Work Plan.

The NYSDEC will be provided the proposed work schedule when available, and no less than 5-days prior to commencing with the proposed work. This will allow NYSDEC personnel the opportunity to observe the work.

If you have any questions or require additional information, please do not hesitate to contact us at (518) 885-5383.

Respectfully submitted,
LABELLA ASSOCIATES, D.P.C.

Aaron Yecies, CPG, P.G.
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Fil L. Fina III, P.E.
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cc: Linette Waling – 61 Edson Street LLC
Christopher O'Neil – NYSDEC
Gerald Burke - NYSDEC