134 Greenridge Drive, Manlius, NY 13104

18 July 2024

Melissa Sweet, P.E.
Professional Engineer I
Division Environmental Remediation
New York State Department of Environmental Conservation
625 Broadway, 12th Floor
Albany, NY 12233-7016

Via Email: melissa.sweet@dec.ny.gov

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

Dear Ms. Sweet:

James Environmental Management (JEM) has prepared this Corrective Measures Work Plan (CMWP) on behalf of Sticker Mule LLC (Sticker Mule) for the Former Mohasco Mills Complex on Lyon Street and Forest Avenue, Amsterdam, Montgomery Couty (the Site). The Site location is shown on Figure 1. This CMWP was prepared, in part, as response to correspondences from New York State Department of Environmental Conservation (NYSDEC) dated 31 May 2024 and 15 July 2024 related to a disturbance of the soil cover that is part of cap that had been constructed at the Site as part of engineering controls (ECs) for the Site.

BACKGROUND

Manufacturing occurred at the Site until about 1984, the Site was used as office and warehouse space for a short time thereafter. 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 and performed site investigation and remediation under the New York State Environmental Restoration Program (ERP). 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 North Chuctanunda Creek, building demolition, placement of geotextile over impacted material, and placement of a two-foot-thick cover of clean soil over areas of impacted soil and debris. The extent of soil cover is shown on Figure 2. 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 20 April 2011 and a Certificate of Completion (CoC) 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 CoC was transferred to Sticker Mule LLC in July 2019.

2023 SOIL COVER BREACH

In early spring, 2024 flooding occurred on Lyon Street at the northeast end of the Site. To mitigate the flooding in the street, deemed to be a safety hazard, the City of Amsterdam constructed a temporary drainage ditch across a portion of the Site to direct water to North Chuctanunda Creek. Due to the emergency nature of the work, the property owner (Sticker Mule) and NYSDEC were not informed of the work until after completion. The structure (photographs provided in Attachment A) was never intended to be permanent. Unfortunately, subsequent flooding made the drainage trench deeper and wider than intended, eroding the cap that is part of the EA.

CORRECTIVE MEASURES

The temporary drainage ditch is no longer needed, as the City of Amsterdam has cleared the storm drains along Lyon Street and re-routed the stormwater pipes to the east along Lyon Street then south to discharge to North Chuctanunda Creek (Figure 3). To restore the soil cap, the following work items will be performed.

- Remove all rip rap, fabric, and other materials that were temporarily placed in the ditch as an emergency measure;
- Confirm that the demarcation layer has not been breached*;
- Place #3 stone to within six inches of finished grade and compact using a hydraulic tamper (document that the stone contains less than 10% by weight material which would pass through a size 80 sieve) ;
- Place geotextile over the crushed stone;
- Place six inches of topsoil that meets DEC testing requirements (as described below) over the geotextile;
- Grade and seed to match surroundings, place straw mulch over the seeded area to protect the seeding.

[*A Qualified Environmental Professional (QEP) as defined in 6 NYCRR Part 375 will evaluate the area to confirm that the demarcation marker has not been damaged. Corrective measures will be implemented if the demarcation marker has been compromised.]

The sloped area south of the temporary trench will be restored by reseeding and placement of an erosion control blanket to prevent erosion until vegetation is established. Silt fence will be placed at the top and base of the hill.

A damaged catch basin is located at the base of the slope south of the temporary trench; that feature will be repaired and subsequently inspected.

Prior to import and placement of soil, the soil will be sampled and submitted to a NYSDOH-approved analytical laboratory for the following analyses: Target Compound List (TCL) Volatile Organic Compounds (VOCs), TCL Semi-Volatile Organic Compounds (SVOCs), RCRA metals, Polychlorinated Biphenyls (PCBs), Pesticides, Per-and polyfluoroalkyl substances (PFAS), and 1,4-dioxane. The soil will be sampled at a rate dependent upon the volume of material to be placed on-site as specified in NYSDEC DER-10 Table 5.4(e)10. Those results will be compared to DER-10 Appendix 5, Commercial Use soil cleanup objectives and submitted to the NYSDEC Project Manager for review prior to import of that material. The DEC form "*Request to Import/Reuse Fill or Soil*" (attached), based on DER-10, will be submitted to DEC for approval prior to importing any fill material (stone or soil) to the Site.

NOTE- If topsoil is placed over stone, it is estimated that 50 Cubic Yards (CY) of soil and 125 CY of stone will be needed resulting in one discrete VOC soil sample and one composite soil sample for all other parameters. If the ditch is filled with only topsoil, it is anticipated that 175 CY of material will be placed, requiring three discrete VOC soil sample and one composite soil sample for all other parameters.

SOIL MANAGEMENT

Initial Site inspections indicate that the geotextile demarcation marker (previously placed above protected soil and fill) has not been compromised. The area will be inspected by the QEP to determine if the demarcation marker has been compromised. If so, a new demarcation marker consisting of 4oz geotextile will be placed in the affected area.

If any work required handling of protected soil under the demarcation marker, a Soil Management Plan (SMP) will be developed and implemented. The SMP will describe material handling, testing and disposal requirements and will include a Community Air Monitoring Plan per NYSDEC guidance DER-10. The SMP will be consistent with the Site Management Plan prepared by ENSR dated July 2007.

REPORTING

The QEP will provide to NYSDEC weekly email summary reports of all activities implemented to repair the soil cap in the temporary trench area. The final report titled Corrective Measures Completion Report will be issued upon completion of the work described herein. This report will describe all cap repair activities and will include the quantities of material, invoices, load tickets, and the names of the suppliers of those materials. The approved Request to Import/Reuse Fill or Soil form and all laboratory results will also be included. Photo-documentation will also be provided.

Please note that, upon completion of the work described herein, the Site Management Plan dated July 2007 will be evaluated and updated as needed to reflect current Site conditions and maintenance/management requirements.

SCHEDULE

The anticipated implementation schedule is as follows:

Start: CMWP approval

- Upon CMWP approval: identify source(s) of material, sample;
- CMWP approval plus 2 weeks: receive analytical results;
- CMWP approval plus 3 weeks: review data, submit materials approval request to NYSDEC, obtain NYSDEC approval of materials;
- CMWP approval plus 6 weeks: complete restoration work;
- CMWP approval plus 8 weeks: submit Corrective Measures Completion Report (CMCR);

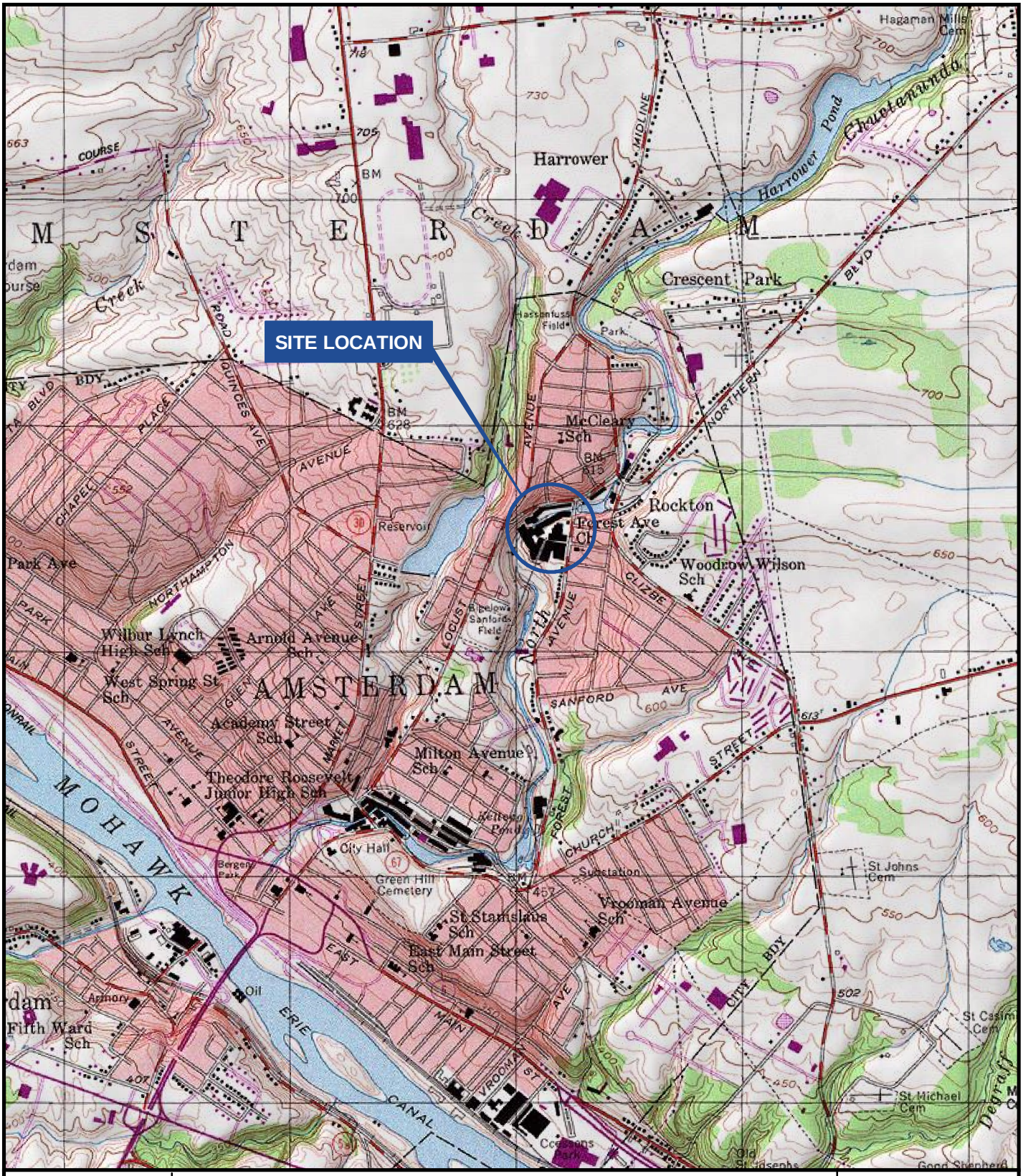
Submit revise Site Management Plan within three weeks of NYSDEC approval of CMCR.

If you have any questions regarding this CMWP, please contact me at 315-263-3388 or by email: jfblasting@james-em.com.

Respectfully;
James Environmental Management

James F. Blasting, P.G.
Principal

Attachments



Map Location	**SITE LOCATION MAP**	**FIGURE 1**
Legend	N	**FORMER MOHASCO MILLS AMSTERDAM, NEW YORK**
0 500 1,000 2,000 Feet		
Scale 1:24,000	USGS 7.5 Minute Quadrangle: Amsterdam, New York Currentness Year: 1989	

jem james environmental management

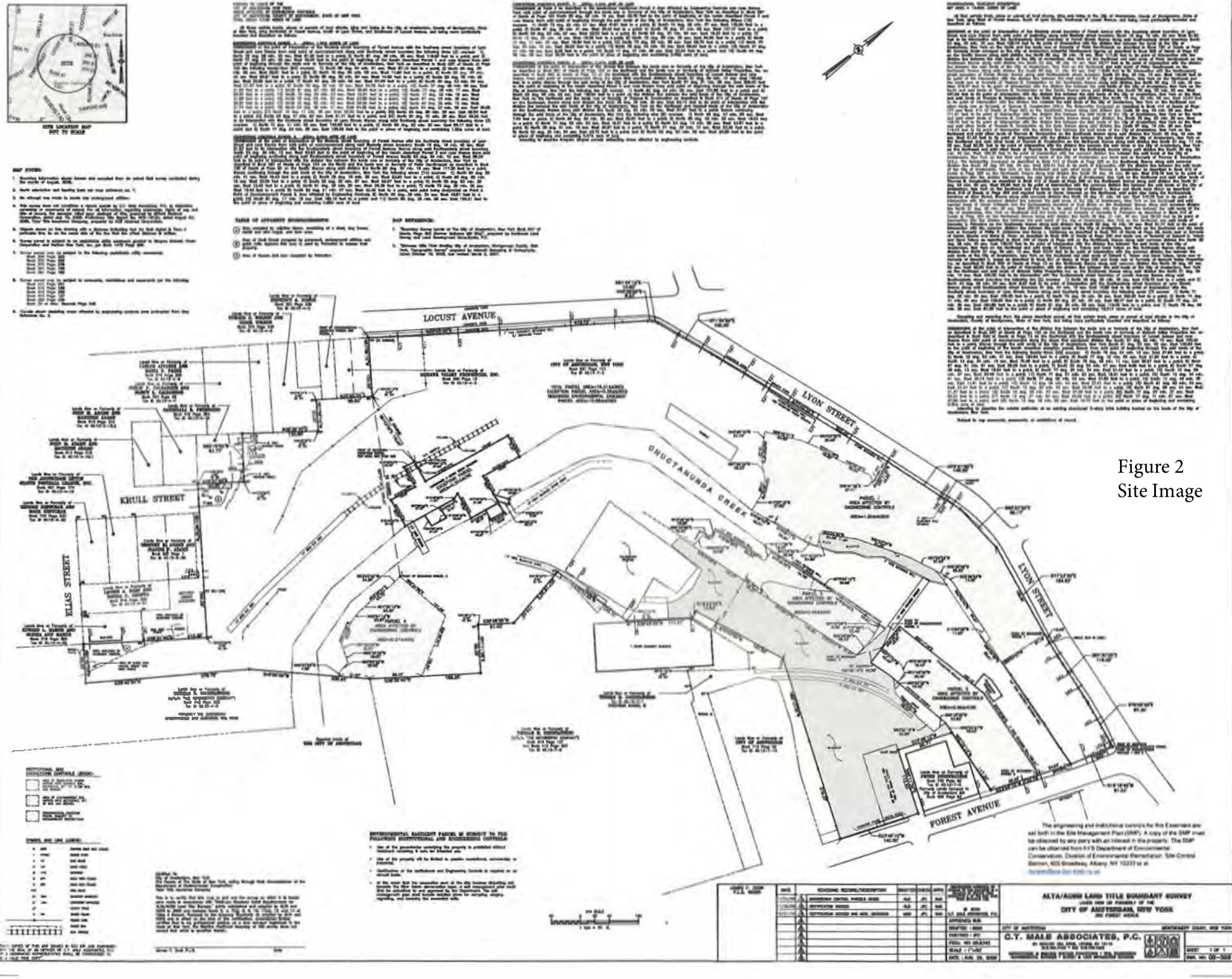


Figure 2
Site Image



FIGURE 3
Storm Pipe Realignment

811 Know what's below. Call before you dig.

NOTIFY BE AT LEAST FORTY-EIGHT (48) HOURS, EXCLUDING THE DAY OF THE NOTIFICATION, BEFORE ANY GROUND DISTURBANCE AND HAVE THE UNDERGROUND FACILITIES MARKED OUT. WAIT FOR THE AFFECTED UTILITY OPERATORS TO RESPOND, AND CHECK THE MARKINGS BEFORE YOU DIG. HAND DIG WITHIN 24 INCHES OF THE MARKINGS TO EXPOSE FACILITIES SAFELY AND PRECAUTIONS. EXCAVATE WITH CARE WITHIN THE TOLERANCE ZONE. IN THE EVENT YOUR FACILITY IS DAMAGED AND YOU GROUND DISTURBANCE CONTINUES LONGER THAN TEN (10) DAYS, NOTIFY BFI AND REQUEST A REMARK.

City of Amsterdam
Engineering Department
61 Church Street, Amsterdam, NY 12010
Michael A. Clark, P.E., City Engineer

REV #	DATE	DESCRIPTION OF REVISION

LYON ST AND WILBUR ST INTERSECTION STORM PIPE REALIGNMENT CITY OF AMSTERDAM, MONTGOMERY COUNTY, NY

DRAWN BY;	ZFB
DATE;	7/18/24
CHECKED BY;	MAC
ISSUE;	AS-BUILT
SCALE;	1'=10'

Photographic Log
Lyon Street and Forest Ave., Amsterdam, NY
Site Visit 5/29/24
James Environmental Management

Photograph 1 Catch Basin and Temporary Stormwater Management Ditch along Lyon Street	
Photograph 2 Temporary Stormwater Management Ditch	

Photographic Log
Lyon Street and Forest Ave., Amsterdam, NY
Site Visit 5/29/24
James Environmental Management

Photograph 3 Slope South of Temporary Stormwater Management Ditch	
Photograph 4 Catch basin at base of slope, to be repaired	

NEW YORK STATE
DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Request to Import/Reuse Fill or Soil

This form is based on the information required by DER-10, Section 5.4(e) and 6NYCRR Part 360.13. Use of this form is not a substitute for reading the applicable regulations and Technical Guidance document.

SECTION 1 – SITE BACKGROUND

The allowable site use is: Choose an item

Have Ecological Resources been identified? Choose an item

Is this soil originating from the site? Choose an item

How many cubic yards of soil will be imported/reused? Choose an item

If greater than 1000 cubic yards will be imported, enter volume to be imported:

SECTION 2 – MATERIAL OTHER THAN SOIL

Is the material to be imported gravel, rock or stone? Choose an item

Does it contain less than 10%, by weight, material that passes a size 100 sieve? Choose an item

Is this virgin material from a permitted mine or quarry? Choose an item

Is this material recycled concrete or brick from a DEC registered processing facility? Choose an item

SECTION 3 - SAMPLING

Provide a brief description of the number and type of samples collected in the space below:

Example Text: 5 discrete samples were collected and analyzed for VOCs. 2 composite samples were collected and analyzed for SVOCs, Inorganics & PCBs/Pesticides.

If the material meets requirements of DER-10 section 5.4(e)5 (other material), no chemical testing needed.

SECTION 3 CONT'D - SAMPLING

Provide a brief written summary of the sampling results or attach evaluation tables (compare to DER-10, Appendix 5):

Example Text: Arsenic was detected up to 17 ppm in 1 (of 5) samples; the allowable level is 16 ppm.

If Ecological Resources have been identified use the "If Ecological Resources are Present" column in Appendix 5.

SECTION 4 – SOURCE OF FILL

Name of person providing fill and relationship to the source:

Location where fill was obtained:

Identification of any state or local approvals as a fill source:

If no approvals are available, provide a brief history of the use of the property that is the fill source:

Provide a list of supporting documentation included with this request:

The information provided on this form is accurate and complete.

_____ _____

Signature Date

_____

Print Name

_____

Firm

Revised April 2023