C.T. MALE ASSOCIATES, P.C.

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August 15, 2005

Mr. Michael P. McLean, P.E.
NYSDEC Region 5
NYS Route 86, PO Box 296
Ray Brook, New York 12977-0296

Re: Remedial Design Report
Independent Leather Brownfield Remediation (#B-00151-5)
City of Gloversville, Fulton County, New York
C.T. Male Project No.: 01.7293

Dear Mike:

C.T. Male has prepared this report to describe and summarize the means and schedule of implementing the February 2004 NYSDEC Record of Decision (ROD) remedy and to conceptually present maintenance and monitoring activities to be followed once the field work for the remedy has been completed. Plans and specifications for implementing the Phase II portion of the remedial action (i.e., soil removal and placement of the soil barrier to contact) have been prepared, released for bid and are due on September 7, 2005. Phase I Remediation (building demolition and asbestos abatement) has already been publicly bid, awarded and successfully completed.

Management of Contaminated Soils

The remedial action will include excavation and off-site disposal of petroleum and/or metal contaminated site soils from the east side of the Cayadutta Creek in accordance with the ROD. Management of these soils will be transportation and disposal to a facility permitted to accept this type of waste. Due to flow control restrictions in Fulton County, non-hazardous contaminated soils are required to be disposed of at Fulton County Landfill. It is not expected that hazardous soils will be encountered based on TCLP testing previously performed on select soil samples from the site. However, if waste characterization samples detect hazardous levels of site contaminates, theses soils will not be accepted by Fulton County Landfill and the Contractor will be required to transport and dispose hazardous soil at a facility permitted to accept this type of waste.

Management of Contaminated Groundwater

Groundwater at the site on the eastern side of the Cayadutta Creek is known to be contaminated by petroleum and certain metals. Depending on the elevation of the water table and the depth of excavation, soil dewatering may need to be employed to

facilitate the soil removal activities. Management of contaminated groundwater will include containerizing the groundwater generated from excavation dewatering in a frac tank with some form of treatment prior to discharge to the sanitary sewer system. It is assumed that there will be no permits required by NYSDEC for discharge of treated water to the municipal sewer unless otherwise directed.

Health and Safety

The east side of the Cayadutta Creek, where the majority of the remedial work will be performed, is surrounded by a 6-foot chain link fence to inhibit unauthorized access from the public. A small portion of the remedial action will include construction traffic on the gravel access road and placement of the soil barrier to contact on the extreme southwest corner of the site. The work area on the west side of the site will be temporarily surrounded by orange construction fence to inhibit unauthorized access during remedial work completion. The placement of the soil barrier to contact in this area will include only limited disturbance of metal contaminated soil along South Main Street and Hill Street to allow for placement of the barrier and maintain similar grades. Excavated soils will be relocated to the east side of the site beneath the soil barrier to contact or disposed off-site at Fulton County Landfill.

The demography of the immediate vicinity of the site is commercial utilization, vacant land, and a bike path. The environment of the work area will be monitored during the remedial action through perimeter air sampling for organic vapors and particulates to evaluate the potential for affecting persons working near or temporarily passing by the site. Electronic instrumentation will be utilized to measure concentrations of organic vapors and particulates to monitor for off-site release of organic vapors or particulates. If a release is detected, work activities will be halted and the work activity causing the release will be modified.

The plans and specifications, specifically Section 02000, describes the minimum requirements for the preparation of the Health and Safety Plan (HASP) that is required within 14 days upon Notice to Proceed. The HASP must be certified by a Certified Industrial Hygienist or Certified Safety Professional and used by the Contractor during remedial action implementation.

Quality Control and Quality Assurance Procedures

A full-time representative from C.T. Male will be at the site during the completion of remedial action to document conformance to the NYSDEC approved May 2005 Remedial Design Work Plan and the August 2005 Plans and Specifications. Other

quality control and quality assurance procedures described in the work plan and project technical specifications to be implemented during remedial work will include the following:

- Analytical sampling to verify clean fill is being used as the soil barrier to contact.
- Pre and post-survey of the lands where the soil barrier to contact will be installed to document 12 inches or greater of clean fill was placed.
- Verification samples to document adequate contaminated soil removal.

Schedule

The tentative schedule for implementation of the remedial action is as follows:

- August 9, 2005 Project Manual Available to the Public
- August 22, 2005 Pre-Bid Conference at the Site (not mandatory)
- September 7, 2006 Bids Due
- Issue Notice to Award on or about September 14, 2005
- Execute Contract Documents Week of September 19, 2005
- Pre-Construction Meeting Week of September 26, 2005
- Issue Notice to Proceed October 3, 2006
- Substantial Completion on or before November 15, 2005
- No Work Between November 15, 2005 through April 1, 1006
- Final Completion May 15, 2006

Substantial completion is defined in the plans and specifications as all work except for hydroseeding. Typically, grass doesn't geminate between November and April and therefore, was the basis for limiting work between these dates.

Post Remedial Action Monitoring Activities

After the remedy is complete, an Operation, Maintenance and Monitoring (OM&M) Manual for the site will be designed and implemented on the basis of actual site conditions. If contamination remains at the site a long-term groundwater monitoring program will also be prepared and made part of the OM&M Manual. It is expected that certain existing monitoring wells and additional new monitoring wells (as necessary on the basis of the results of the remedy) will be sampled on an annual basis. The location of the new monitoring wells will be approved by NYSDEC prior to installation.

Institutional and engineering controls for this site will be administered through an environmental easement. It is assumed that the environmental easement will be prepared by NYSDEC and provided to the Owner/Engineer prior to final issuance. The easement will limit the use and development of the property to commercial uses

only, restrict groundwater use as a source or potable or process water without necessary treatment, and require the property owner to complete and submit to NYSDEC an annual certification. No other permits have been identified as being required for the post remedial action monitoring.

If you have any questions or comments, please call me at (518) 786-7548 to further discuss.

Respectfully Submitted,
C.T. MALE ASSOCIATES, P.C.

Jeffrey Marx, P.E.
Project Engineer

c: Kirk Moline – C.T. Male
Ronald Ellis – C/O Gloversville

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