

C.T. MALE ASSOCIATES

Engineering, Surveying, Architecture & Landscape Architecture, D.P.C.

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February 10, 2015

Mr. Matthew Hubicki, Environmental Engineer
NYSDEC
Division of Environmental Remediation
625 Broadway, 11th Floor
Albany, New York 12233-7014

Re: RAWP Amendment #2
USAI Lighting Facility, Town of New Windsor, New York
BCP Site Number: C336087
C.T. Male Project No. 14.4337

Dear Matt:

During the remedial action work and installation of utilities at the USAI Lighting facility, subgrade piping believed to be associated with the former Major Oil Storage Facility (MOSF) has been encountered. Three (3) of these pipes have been documented to continue off the property subject to the Brownfield Cleanup Program and travel off-site in the western direction. The attached figure shows the approximate location of the pipes in question.

Described in this proposal are the work tasks for permanently closing the former MOSF petroleum product piping at the property line. Because methods for addressing pipes leading off-site are not addressed within the Department approved Remedial Action Work Plan, we are seeking the Department's concurrence that this work may be amended to the May 27, 2015 Remedial Action Work Plan and approved for implementation under the BCP.

In terms of a plan for this work, the following procedure will be followed:

- Expose the subgrade piping back to the property line;
- Cut the pipe and capture remaining bulk product (if any) for proper disposal;
- Plug the inside of the pipe with an inflatable pipe pig;
- Seal the end of the pipe with hydraulic cement; and
- Locate the end of the pipes by measurements from existing site features.

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The work is to be performed by Profex and will be observed by C.T. Male. Our observations will be summarized in the Final Engineering Report along with providing field sketch and related disposal documentation.

If this work related to the former MOSF petroleum product piping heading off-site is acceptable to the Department as an amendment to the approved RAWP and eligible for BCP tax credits, please provide written acceptance of the attached work plan/proposal.

If you have any question, please contact me at (518) 786-7548 or j.marx@ctmale.com.

Sincerely,
C.T. MALE ASSOCIATES



Jeffrey A. Marx, PE
Project Environmental Engineer

Att: Partial Site Plan

c: Sue Sullivan, iSER Consulting
Jim McIver, C.T. Male Associates

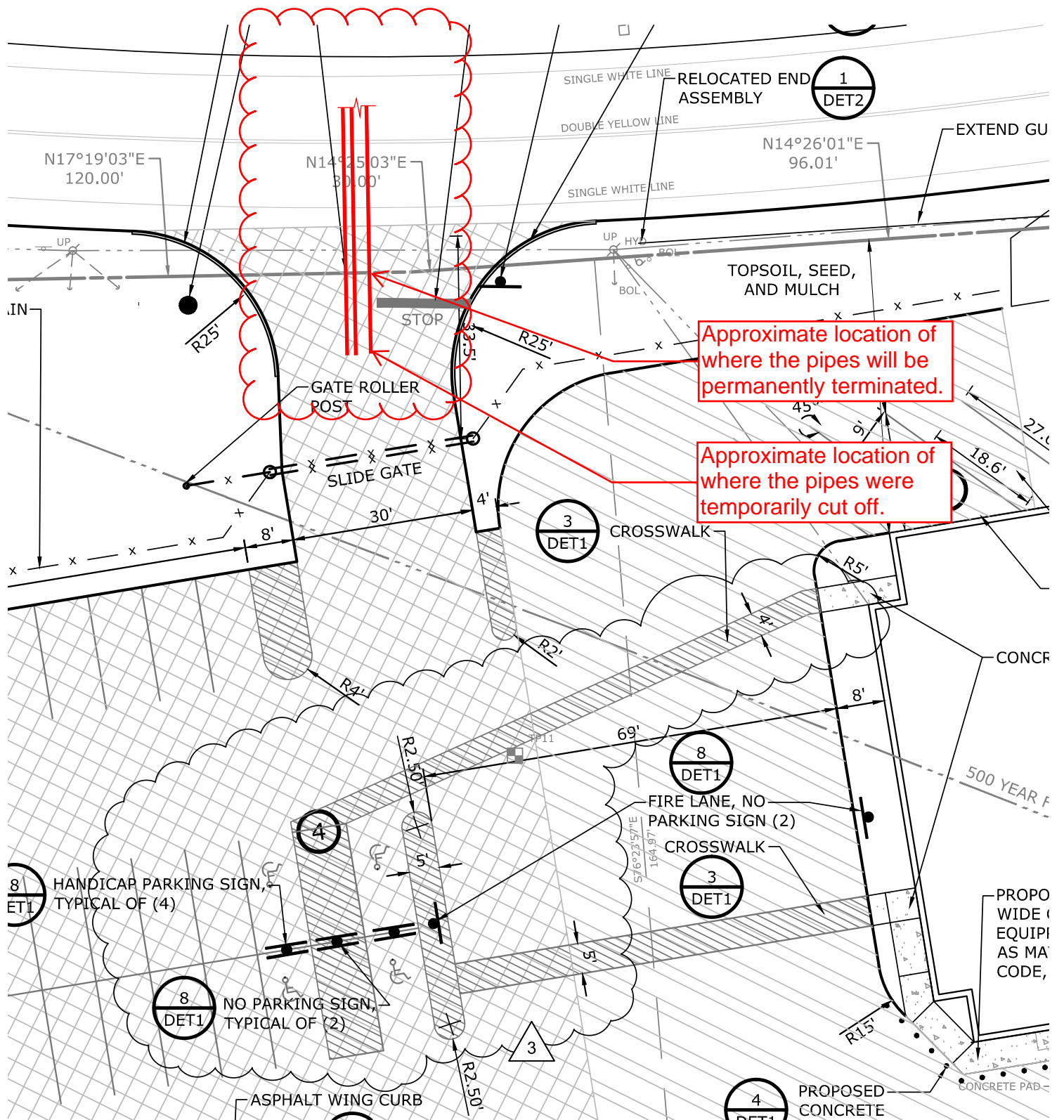


FIGURE 1
RAWP AMENDMENT NO #2
USAI LIGHTING FACILITY
NEW WINDSOR, NY
2/10/16