C.T. MALE ASSOCIATES

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

Dear Matt:

According to investigative work done by others there was a detection of PCBs related to the existing active transformer located on the west side of the site near the emergency generator. As per Section 1.4.3 of the Remediation Action Work Plan (RAWP), this area was to be further investigated and as warranted remediated. After review of the area C.T. Male collect samples for total PCB analysis to determine the extent of PCB impacts. The results of which are shown on the attached sketch.

As shown, two (2) of the six (6) samples detected PCBs greater than 1 ppm in surface soil and therefore exceed the remedial action goals for surface soils. As such, PCB impacted soils are planned to be removed and disposed of. Also shown on the attached is a sketch is the soil removal limits for a depth of 12 inches.

After soil removal, additional end point soil samples will be collected and analyzed for documenting the removal has reached less than 1 ppm soil cleanup objectives. The end point soil sample locations are also shown on the attached sketch. After results of

The work will be performed by Profex and will be observed by C.T. Male. Our observations and the analytical testing results will be summarized in the Final Engineering Report along with providing field sketch and related disposal documentation. If end point sample results do not meet remedial goals of 10 ppm in subsurface soils, additional PCB impacted soil removal will be implemented and more end point samples will be collected.

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If this work related to the PCB impacted soil removal 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.

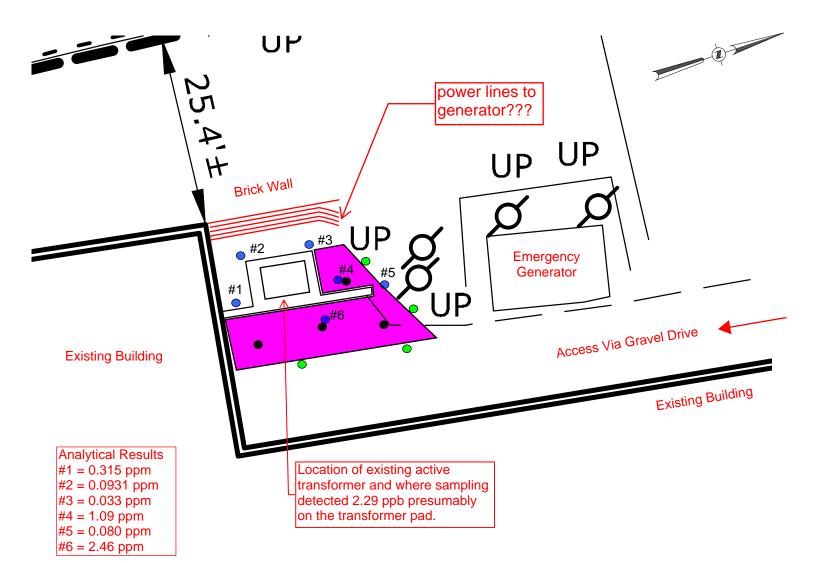
Sincerely, C.T. MALE ASSOCIATES

Jeffry A. May

Jeffrey A. Marx, PE Project Environmental Engineer

Att: Partial Site Plan

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



LEGEND

Surface Soil Sample Location (0 - 2").

Proposed soil removal to 12" below grade

- Proposed end point sidewall soil sample at 0 - 2" below grade)
- Proposed end point floor soil sample at 12" below grade

NOTES

- 1.) Sampling locations are approximate.
- 2.) Drawing not to scale.

3.) At a minimum, the upper tier of PCB impacted soil removal should be completed by hand due to close proximity to transformer and emergency generator with potential to encountered buried electric lines. This is to the discretion of the contractor.