C.T. MALE ASSOCIATES
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October 14, 2016

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

Re: RAWP Amendment #4
USAI Lighting Facility, Town of New Windsor, New York
BCP Site Number: C336087
C.T. Male Project No. 14.4337

Dear Matt:

Attached is the October 14, 2016 Pipe Removal Work Plan prepared by Sterling Environmental Engineering, P.C. for your information. Described in this proposal are the work tasks for permanently closing former MOSF petroleum product piping located near the southeast corner of the USAI Lighting Facility site. Because the Department recently acknowledged the connection of these pipes to the Brownfield Cleanup Program defined site boundaries, 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.

As described in the attached work plan, there is a small portion of oil piping under the railroad bridge that may require a permit to remove because of minimal stream disturbance. Such permits are being explored, but it is the intent to begin cleaning out the contents of the oil piping and removal of all above ground piping before such permit is received. The portion of pipe under the railroad bridge will remain in-place under the Department's approval of this work plan.

The contractor is anticipating starting this work upon the Department's response. The contractor is prepared to start work as early as next week. We look forward to hearing from you on the progress of the Department's review of this work plan.

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: Sterling Work Plan

c: Sue Sullivan, iSER Consulting
Mark Millspaugh, P.E., Sterling
David Crosby, P.E., NYSDEC Central Office
Edward Moore, P.E., NYSDEC Regional Office
Hans Taylor, Taylor Montgomery, LLC
Gerald Jacobowitz, Esq., Jacobowitz and Gubits LLP

Sterling Environmental Engineering, P.C.

October 14, 2016

Mr. Edward L. Moore, P.E.
DER Supervisor
New York State Department of Environmental Conservation
Region 3
21 South Putt Corners Road
New Paltz, New York 12561-1696

Subject: Littman Property, 1116 River Road, New Windsor, New York
Pipe Removal Work Plan
Brownfield Cleanup Program (BCP) Site No. C336087
Former PBS Site No.: 3-602410
STERLING File #2016-34

Dear Mr. Moore,

This letter serves to provide the New York State Department of Environmental Conservation (NYSDEC) with notification of the planned cleaning and removal of piping at the former fuel dock located at 1116 River Road, in the Town of New Windsor, New York (hereinafter, the site). A site location map and aerial photograph of the site are provided as Figures 1 and 2, respectively. The site is currently being redeveloped under the NYSDEC Brownfield Cleanup Program (BCP) as site #C336087. The work described herein is also being completed under the BCP with NYSDEC's support.

The site formerly operated as a Petroleum Bulk Storage (PBS) facility registered with the NYSDEC as site #3-602410. The site's PBS registration details are provided as Attachment 1. As detailed in Attachment 1, the site's four (4) aboveground and underground storage tanks associated with the PBS registration were closed and removed on October 5, 2015 and December 10, 2015. Based on the PBS registration details, #2 fuel oil was transferred and stored at the site.

The site also operated as a Major Oil Storage Facility (MOSF) between the late-1950s to mid-1990s at which time it had seven (7) bulk fuel oil storage tanks (NYSDEC MOSF #3-1380). These tanks are no longer present at the site.

Piping associated with historic petroleum handling and storage operations remains onsite at the location of the site's fuel dock. Photographs of the remaining piping are provided as Attachment 2. Piping was formerly used for marine-to-land fuel oil transfer and consists of 8" diameter steel plumbing. The piping extends approximately 400 feet from the former location of the site's southwest corner, under a railroad bridge in the stream bed, then above grade to a steel pier located along the shoreline of the Hudson River and to the end of the marine transfer dock. The portion of the piping under the railroad bridge that would cause stream embankment disturbance will not be removed until the proper State and Federal permits are put in-place. The removal of the contents of the piping under the railroad bridge may occur prior to obtaining the applicable permits.

The aforementioned piping will be cleaned and removed following the procedures outlined below, to the extent they are deemed effective.

Scope of Work

The purpose of this work is to remove and/or close the aboveground pipes remaining and to reduce the potential for a release of the pipe contents to the site pursuant to the NYSDEC BCP. Liquid and product remaining in the obsolete piping will be flushed and containerized prior to dismantling the pipes. Limitations of access created by surrounding water, railroad traffic, as well as the overall length of the plumbing, will dictate the methods that can be used to accomplish the work.

The work will involve the combined use of a pump, pressure jet, and vacuum truck to introduce high pressure water into the abandoned oil piping, flushing residual oil and water from within the pipe. Premixed Simple Green Solvent, or equivalent, will be pumped east to west through the pipe to clean the internal portion of the piping. A pressure jet may be used to introduce high pressure water with a jetting nozzle, scouring the inside of each pipe. Simultaneously, the water and oil will be vacuumed from the pipe and containerized for disposal.

In the event that an internal piping obstruction prevents the flushing of residual oil and water from within the pipe, the top portion of the pipe will be cut, where appropriate, to allow for visual inspection and physical removal of the obstruction.

Necessary containment measures (e.g. 5.75-foot diameter PIG® Portable Spill Containment Pool or equivalent) will be used to prevent water and oil from spilling from the work areas. Containment areas will be constructed on a solid surface, created for each area where the cleaning/dismantling is taking place.

Approximately 40 to 50-linear feet of piping is located within a drop culvert located below a CSX Transportation (CSX) railroad. Piping will generally be removed east to west toward the drop culvert. Once the piping to the east of the culvert is dismantled, piping to the west of the culvert will be dismantled. The remaining piping located within the culvert will be capped at both ends and pulled with a crane toward a barge located to the east of the CSX tracks. CSX will be notified of the work prior to conducting activities within the vicinity of the railroad; however, access to CSX land is not anticipated.

Work Sequence

Work will generally be performed using the following work sequence:

1. Coordinate an onsite staff meeting, finalize the action plan and review the Health and Safety Plan (HASP). Post and implement applicable permit requirements.

2. Stock initial emergency spill clean-up material onsite. Clear debris from manmade swale around the pipes west of the CSX tracks. Prepare work area as necessary. Install all safety instruments and deploy containment booms for use as a secondary containment measure. Install spill containment pools at eastern and western work areas.

3. Pressure test and/or visually inspect pipes and plug any open pipes as needed.

4. Stage vacuum truck to the west of the CSX tracks and secure a fitting to the end of the pipe located to the west of the CSX track. Stage a pump and a large drum of premixed Simple Green solvent, or equivalent, on a boat or barge to the east of the CSX tracks. Proposed staging of equipment is shown on Figure 3.

5. Clean and pressure wash internal portion of piping by pumping water and or Simple Green solvent east to west through the pipes. If appropriate, clean the pipe with a pipe pig and flush the pipe again, east to west. Vacuum out spent material from plumbing and containerize for disposal.

6. If flushing and subsequent pipe pig process does not clean the pipe thoroughly, a pressure jet will be introduced through the eastern portion of the piping while maintaining suction on the western portion of the pipe.

7. Deploy containment pools under field selected portions of the piping to cut, visually inspect and dismantle the piping east to west. Cut piping into 20 to 30-linear-foot sections. Use expandable plugs to prepare each section for transportation and disposal or salvage. Use crane to load pipe sections onto barge.

8. Dispose of wastewater and piping in accordance with applicable local, State and Federal regulations and recommendations. Cleanup site (i.e. collect safety instruments, containment measures, etc.) and demobilize.

Spill Response

Containment booms will be deployed in the waterway around each work area to minimize impacts of a potential release. Spill response equipment (i.e. spill pads, spill booms, etc.) will be onsite during cleaning and removal procedures, and standby contractors will be available to respond in the event of a spill. In the event of a spill, spill response equipment and the onsite vacuum truck will be used to immediately respond to the spill and capture the spilled material.

Sampling of soil beneath above-grade piping will be conducted if there is evidence of a discharge (i.e. discolored soil, etc.). Sampling will be conducted pursuant to NYSDEC's Technical Guidance for Site Investigation and Remediation (DER-10) subdivision 3.9(e) (i.e. one (1) sample for every 900 square feet of impacted soil).

If a spill occurs, the spill will be reported to the NYSDEC Spill Hotline within two (2) hours of the spill by contacting (800) 457-7362. The spill will also be reported to the site Owner and/or the Owner's representatives without delaying notification to the NYSDEC and, if applicable, the United States Environmental Protection Agency (USEPA).

A spill will be reported to the USEPA Region 2 office at (212) 637-4040 if a discharge meets any of the following conditions:

- violates applicable water quality standards,
- causes a sheen or discoloration on the surface of a body of water or adjoining shore line, or
- causes a sludge or emulsion to be deposited beneath the surface of the water or adjoining shore line.

Closure Report

Records and documentation regarding the removal and closure of pipes will be compiled into a Closure Report for submission to the NYSDEC. The Closure Report will include, at a minimum, a description of the work completed, photographs, waste characterization data, and disposal records. The Closure Report will be certified by a New York State licensed professional engineer using the following certification language:

> *I _____certify that I am currently a [NYS registered professional engineer or Qualified Environmental Professional as defined in 6 NYCRR Part 375] and that this Closure Report was prepared in accordance with all applicable statutes and regulations and in substantial conformance with the DER Technical Guidance for Site Investigation and Remediation (DER-10) and that all activities were performed in full accordance with the DER-approved work plan and any DER-approved modifications.*

The Closure Report to be prepared by Sterling Environmental Engineering, P.C. will be made an exhibit to the Final Engineering Report to be prepared by C.T. Male Associates as required under the NYSDEC BCP.

Community Air Monitoring Plan

During the completion of work, primarily during the handling of petroleum products, community air monitoring will be performed. The Community Air Monitoring Plan (CAMP) will consist of continuous monitoring for volatile organic compounds (VOCs) in accordance with New York State Department of Health's Generic Community Air Monitoring Plan. Monitoring for particulates is not warranted as soil disturbance during this work is negligible. C.T. Male Associates will be implementing the air monitoring for volatile organic vapors using two environmental enclosures equipped with Mini-RAE 3000 photo-ionization detectors. These enclosures will be placed on the west side of the railroad tracks which will be between the pier work and potential public receptors.

Schedule

The cleaning and removal of piping at the site's former fuel dock will commence on or about the week of October 17, 2016, with the portion of pipe removal from the stream embankment starting promptly after the required permitting is received. The projected timeframe is five (5) business days.

Please contact me should you have any questions regarding the described work.

Very truly yours,

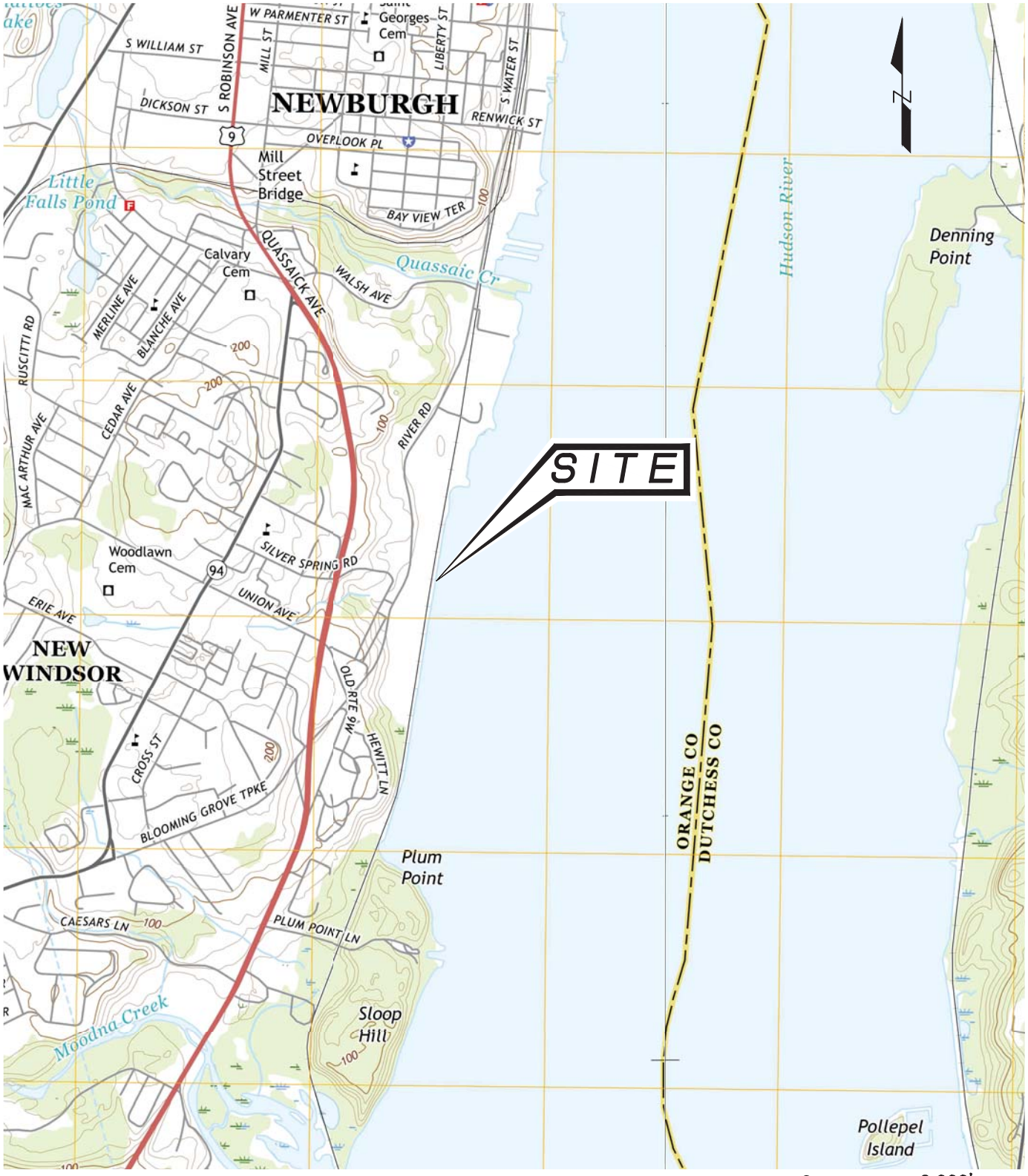
STERLING ENVIRONMENTAL ENGINEERING, P.C.

Mark P. Millspaugh, P.E.
President
mark.millspaugh@sterlingenvironmental.com

MPM/bc
Email Only
Attachments

cc: Matthew Hubicki, NYSDEC (Email Only)
David Crosby, P.E., NYSDEC (Email Only)
Hans Taylor, Taylor-Montgomery, LLC (Email Only)
James W. Taylor Jr., Taylor-Montgomery, LLC (Email Only)
Jeffrey A. Marx, P.E., C.T. Male Associates (Email Only)
Sue Sullivan, MPA, iSER Consulting, LLC (Email Only)
Gerald N. Jacobowitz, Esq., Jacobowitz and Gubits, LLP (Email Only)

FIGURES



MAP REFERENCE: USGS WEST POINT AND CORNWALL-ON-HUDSON 7.5 MINUTE QUADRANGLES, 2016

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24 Wade Road ♦ Latham, New York 12110

SITE LOCATION MAP
LITTMAN
1116 RIVER ROAD
TOWN OF NEW WINDSOR ORANGE CO., NEW YORK

PROJ. No.: 2016-34	DATE: 10/4/2016	SCALE: 1" = 2,000'	DWG. NO. 2016-34001	FIGURE 1

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MAP REFERENCE: USGS HIGH RESOLUTION ORTHOIMAGERY, 2013

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SITE AERIAL MAP

LITTMAN

1116 RIVER ROAD

TOWN OF NEW WINDSOR ORANGE CO., NEW YORK

PROJ. No.: 2016-34	DATE: 10/4/2016	SCALE: 1" = 300'	DWG. NO. 2016-34002	FIGURE 2

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0 50' 100'

1" = 100'

MAP REFERENCE: GOOGLE MAP DATA, 2016

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24 Wade Road ♦ Latham, New York 12110

PROPOSED STAGING PLAN

LITTMAN

1116 RIVER ROAD

TOWN OF NEW WINDSOR ORANGE CO., NEW YORK

PROJ. No.: 2016-34	DATE: 10/13/2016	SCALE: 1" = =100'	DWG. NO. 2016-34003	FIGURE 3

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ATTACHMENT 1
PETROLEUM BULK STORAGE REGISTRATION DETAILS

NEW YORK STATE OF OPPORTUNITY | Department of Environmental Conservation

Bulk Storage Database Search Details

Facility Information

Site No.: 3-602410
Status: Unregulated/Closed
Expiration Date: 12/18/2020
Site Type: PBS
Site Name: USAI LIGHTIING FACILITY
Address: 1116 RIVER ROAD
Locality: NEW WINDSOR
State: NY
Zipcode: 12553
County: Orange

Owner(s) Information

Facility Owner: LOC REALTY CORP (MRS. ELFRIEDE LITTMAN)
1116 RIVER ROAD . NEW WINDSOR, NY. 12553
Mail Contact:
1126 RIVER ROAD . NEW WINDSOR, NY. 12308

Tank Information

4 Tanks Found

Tank No	Tank Location	Status	Capacity (Gal.)
1	Aboveground on saddles, legs, stilts, rack or cradle	Closed - Removed	275
2	Aboveground on saddles, legs, stilts, rack or cradle	Closed - Removed	300
3	Aboveground on saddles, legs, stilts, rack or cradle	Closed - Removed	550
4	Underground including vaulted with no access for inspection	Closed - Removed	8000

Refine This Search

NEW YORK STATE OF OPPORTUNITY | Department of Environmental Conservation

Bulk Storage Database Search Details

Tank Information

Next Tank Last Tank

Site No: 3-602410
Site Name: USAI LIGHTIING FACILITY
Tank No: 1
Tank Location: Aboveground on saddles, legs, stilts, rack or cradle
Tank Status: Closed - Removed
Tank Install Date:
Tank Closed Date: 10/05/2015
Tank Capacity: 275 gal.
Product Stored: #2 fuel oil (on-site consumption)
Percentage: 100%
Tank Type: 01 - Steel/Carbon Steel/Iron
Tank Internal Protection: None
Tank External Protection: Painted/Asphalt Coating
Tank Secondary Containment: None
Tank Leak Detection: None
Overfill: None
Spill Prevention: None
Dispenser: None
Pipe Location: No Piping
Pipe Type: No Piping
Pipe External Protection: None
Piping Secondary Containment: None
Piping Leak Detection: None
Tank Next Test Due:
Tank Last Test:
Tank Test Method: Testing Not Required

Refine This Search

Return To Facility

NEW YORK STATE OF OPPORTUNITY | Department of Environmental Conservation

Bulk Storage Database Search Details

Tank Information

First Tank | Previous Tank | Next Tank | Last Tank

Site No: 3-602410
Site Name: USAI LIGHTIING FACILITY
Tank No: 2
Tank Location: Aboveground on saddles, legs, stilts, rack or cradle
Tank Status: Closed - Removed
Tank Install Date:
Tank Closed Date: 10/05/2015
Tank Capacity: 300 gal.
Product Stored: #2 fuel oil (on-site consumption)
Percentage: 100%
Tank Type: 01 - Steel/Carbon Steel/Iron
Tank Internal Protection: None
Tank External Protection: Painted/Asphalt Coating
Tank Secondary Containment: None
Tank Leak Detection: None
Overfill: None
Spill Prevention: None
Dispenser: None
Pipe Location: No Piping
Pipe Type: No Piping
Pipe External Protection: None
Piping Secondary Containment: None
Piping Leak Detection: None
Tank Next Test Due:
Tank Last Test:
Tank Test Method: Testing Not Required

Refine This Search

Return To Facility

NEW YORK STATE OF OPPORTUNITY | Department of Environmental Conservation

Bulk Storage Database Search Details

Tank Information

First Tank | Previous Tank | Next Tank | Last Tank

Site No: 3-602410
Site Name: USAI LIGHTIING FACILITY
Tank No: 3
Tank Location: Aboveground on saddles, legs, stilts, rack or cradle
Tank Status: Closed - Removed
Tank Install Date:
Tank Closed Date: 10/05/2015
Tank Capacity: 550 gal.
Product Stored: #2 fuel oil (on-site consumption)
Percentage: 100%
Tank Type: 01 - Steel/Carbon Steel/Iron
Tank Internal Protection: None
Tank External Protection: Painted/Asphalt Coating
Tank Secondary Containment: None
Tank Leak Detection: None
Overfill: None
Spill Prevention: None
Dispenser: None
Pipe Location: No Piping
Pipe Type: No Piping
Pipe External Protection: None
Piping Secondary Containment: None
Piping Leak Detection: None
Tank Next Test Due:
Tank Last Test:
Tank Test Method: Testing Not Required

Refine This Search

Return To Facility

NEW YORK STATE OF OPPORTUNITY | Department of Environmental Conservation

Bulk Storage Database Search Details

Tank Information

First Tank Previous Tank

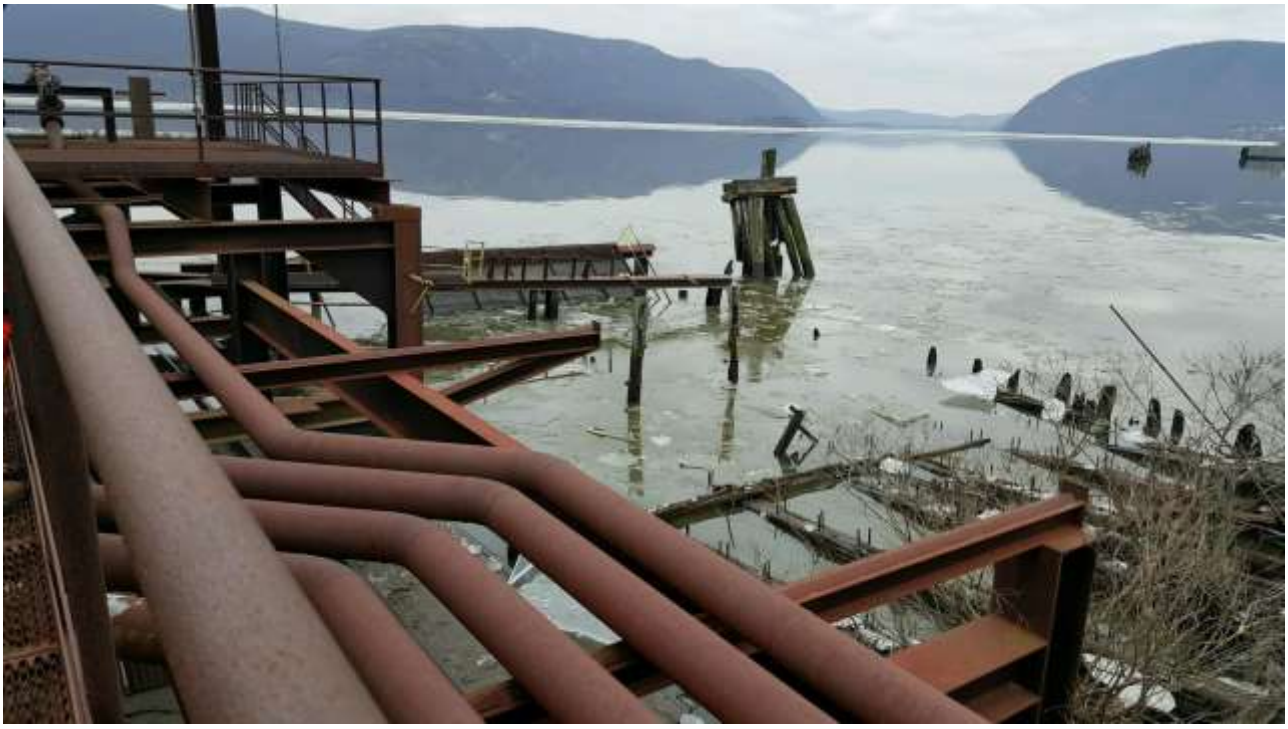
Site No: 3-602410
Site Name: USAI LIGHTIING FACILITY
Tank No: 4
Tank Location: Underground including vaulted with no access for inspection
Tank Status: Closed - Removed
Tank Install Date:
Tank Closed Date: 12/10/2015
Tank Capacity: 8000 gal.
Product Stored: other
Percentage: 100%
Tank Type: 01 - Steel/Carbon Steel/Iron
Tank Internal Protection: None
Tank External Protection: Painted/Asphalt Coating
Tank Secondary Containment: None
Tank Leak Detection: None
Overfill: None
Spill Prevention: None
Dispenser: None
Pipe Location: No Piping
Pipe Type: No Piping
Pipe External Protection: None
Piping Secondary Containment: None
Piping Leak Detection: None
Tank Next Test Due:
Tank Last Test:
Tank Test Method: Testing Not Required

Refine This Search

Return To Facility

ATTACHMENT 2
PHOTOGRAPHS OF REMAINING FACILITY PIPING

Photograph 1: Remaining onsite piping at the location of the former fuel dock.



Photograph 2: Remaining onsite piping at the location of the former fuel dock.

Photograph 3: Remaining onsite piping at the location of the former fuel dock.

Photograph 4: Remaining onsite piping at the location of the former fuel dock.

Photograph 5: Remaining onsite piping at the location of the former fuel dock.

Photograph 6: Remaining onsite piping at the location of the former fuel dock.

Photograph 7: Remaining onsite piping at the location of the former fuel dock.