February 8, 2019

Stephen M. Moore
Salisbury Bank
5 Bissell Street – P.O. Box 1868
Lakeville, CT 06039-1868 via e-mail: smoore@salisburybank.com

Re: Status Report of Environmental Conditions at the property located at
317 Main Street, Cornwall, Orange County, NY
NYSDEC Spill #: 18-01592; WCD File: SC18035

Dear Mr. Moore:

This Status Report of Environmental Conditions (Report) summarizes known information from previous subsurface investigations and remedial activities performed at the above referenced property (Site) by WCD Group (WCD).

1.0 NYSDEC SPILL SITE

1.1 Overview

The following summarizes WCD's *Letter Report of Site Conditions* (August 10, 2018), previously submitted to NYSDEC:

- Phase I and Phase II investigations were conducted by others in 2016 and March 2018, respectively. Areas of concern included past use as a gasoline station and automotive sales and service. Investigative findings indicated that a petroleum release had occurred and WCD called in a spill event to NYSDEC on April 3, 2018.
- WCD performed a subsurface investigation in May and June, including geophysical survey, installation of borings and groundwater wells, and collection of soil vapor, soil and groundwater samples. Exploratory test pits were extended in the former gasoline underground tank area between the front of the building and Main Street. WCD collected waste characterization samples and supervised off-site disposal of petroleum contaminated soil and the backfilling of the excavation area with clean materials.
- All readily accessible petroleum-impacted soil was excavated and disposed off-site; significant residual soil contamination, however, remains (except to the east) and groundwater is contaminated. Impacted soil appears to extend under the surface at the adjoining properties to the north (public road) and west (former filling station), and may extend somewhat under the northern portion of the on-site structure.

Existing data suggest that the spill event may be tied to a release at the western adjoining property (there is no evidence of any significant impacts beneath the front of the on-site building, a former showroom, closest to the spill site).

1.2 Communications with NYSDEC

WCD participated in a conference call with NYSDEC Spill Officer Keith Browne on September 18, 2018 to discuss a strategy for moving forward with spill closure and remediation.

- Existing data was reviewed and it was acknowledged that: peak soil contamination exists along the western-northwestern side of the excavation area and property line; significant VOC contamination is present in groundwater at this location; and, the subject property (317 Main Street) had been fully investigated as far west as is possible due to current site constraints.
- NYSDEC requested that additional soil data be collected at the adjoining property to the west at 319 Main Street (former gasoline station) and at other adjoining/nearby areas to determine whether there is an off-site source contributing to on-site conditions or off-site impacts from the spill. NYSDEC agreed to provide a letter requesting additional investigation at the off-site locations (S. Spitzer of WCD reached out to NYSDEC on January 22, 2019 to request the letter; no response has yet been received).

1.3 Next Steps

The following actions are required:

- Develop a scope of work for off-site investigation (WCD is providing this to you under separate cover);
- Secure access agreements/permits as necessary for investigative fieldwork at adjoining properties and/or public sidewalks;
- Conduct additional subsurface investigation (it is estimated that up to three days of fieldwork, inclusive of a drilling sub-contractor to extend borings and install wells, would be required); and,
- Issue report to NYSDEC.

If a source area is found at 319 Main Street, NYSDEC will establish a new spill case for that property (and may require that the spill investigation and remediation be conducted by the owner of that site).

If data are inconclusive or show that the spill originates at the subject property, then the investigative work will be expected to generate sufficient information to develop a final scope for delineation and/or an additional remedial response action.

2.0 FORMER AUTOMOTIVE REPAIR FACILITY

2.1 Overview

The following summarizes WCD's *Letter Report of Environmental Sampling* (July 20, 2018), previously submitted to your office. [Note: This document included both the information submitted to NYSDEC in regards to the spill event (see above) as well as information for the former repair facility; for clarity, the spill information is not reproduced here.] Findings are discussed in units of parts per million (ppm) and parts per billion (ppb).

2.2 Documented Site Contamination

Sampling results for soil were compared to NYSDEC Part 375-6 Unrestricted Use (UU) and Restricted Residential Use (RRU) Soil Cleanup Objectives (SCOs) and groundwater results were compared to Ambient Water Quality Standards (AWQS) provided in NYSDEC TOGS 1.1.1. The State of New York does not have any standards, criteria or guidance values for volatile chemicals in subsurface vapors.

Soil Vapor

Soil vapor sampling was conducted at four (4) locations within the on-site building: two in the front/northern side (SV-01 and SV-02) closest to the spill area; one in the central portion (SV-03); and one toward the rear of the building (SV-04). Soil vapor samples were analyzed for volatile organic compounds (VOCs).

Relatively high levels of tetrachloroethene (PCE; a chlorinated solvent) and total BTEX (petroleum compounds associated with gasoline) were detected in samples SV-03 and SV-04 at the central portion of the building (peak values of 490 and 6,610 µg/m^3, respectively). Peak values for these compounds were much lower in samples SV-01 and SV-02 at the northern portion of the building outside the repair area (99 and 32 µg/m^3, respectively).

Soil

Soil borings were extended to provide information on soil conditions in areas likely to be up- and cross-gradient from the spill site, and to provide general screening for impacts from historical use of the central and rear portions of the on-site building as a vehicle repair facility (SB-07, MW-02 and MW-04 at the building interior, and SB-06 and MW-03 at exterior areas).

Field evidence of contamination was observed at SB-07 from 4 to 8 feet (mild petroleum odor and PID readings [77 ppm]) and at MW-03 from the surface to 12 feet (staining, mild to moderate petroleum odor, and high PID readings [peak 698 ppm]). Groundwater was encountered in borings at 8 to 9 feet (no sheens were observed).

Soil samples collected at the groundwater interface (or the most contaminated interval, if overt contamination was observed) were analyzed for semivolatile organic compounds (SVOCs) and VOCs. No significant concentrations of organic compounds were reported.

Groundwater

Borings MW-02 to MW-03 were completed as groundwater monitoring wells and water samples were analyzed for VOCs.

Total VOCs were reported at MW-02 at approximately 607 ppb, including 1,4-dioxane (compound typically associated with chlorinated solvents, 140 ppb, AWQS not established), tert-butyl alcohol (TBA, non-chlorinated solvent, 71 ppb, AWQS not established), and an elevated concentration of MTBE (a gasoline additive, 390 ppb, AWQS 10 ppb). No significant contamination was reported at upgradient well MW-04 (notable detections include trace concentrations of the solvent trichloroethylene [TCE] and its breakdown products).

Total VOCs were reported at MW-03 at approximately 248 ppb, including elevated concentrations of multiple petroleum compounds (peak values reported for 1,2,4-trimethylbenzene at 56 ppb and cyclohexane at 57 ppb).

Conclusions

Soil vapor results for the central and rear portion of the building, along with elevated concentrations of MTBE, 1,4-dioxane and TBA detected in groundwater at MW-02, indicate a potential historical release of gasoline and solvents, likely associated with the former use of the facility for vehicle repair.

The presence of elevated concentrations of MTBE upgradient of the spill site suggests that a separate reportable spill event may have occurred at the on-site building. There is no evidence of any significant impacts beneath the front of the building (former showroom), closest to the spill site.

It is not known at this time if VOC contamination documented at MW-03 is related to the spill site, if it is the result of a separate release at or near the building, or is potentially from a release at the adjoining property to the east.

2.3 Next Steps

Additional subsurface investigation is required at and near the central and southern portions of the building (it is estimated that one to two days of fieldwork would be required).

Please review this document and contact me at (845) 452-1658 should you have any questions or require additional information.

Sincerely,

WCD GROUP

Scott Spitzer
Senior Consultant,
Technical Director - Environmental Services

Attachment: Fieldwork Map

All feature locations are approximate. This map is intended as a schematic to be used in conjunction with the associated report, and it should not be relied upon as a survey for planning or other activities.

Fieldwork Map

317 Main Street
Cornwall, New York

Legend:

- excavation area boundary
- monitoring well location
- soil sampling location
- soil vapor sampling location

Note: MW-01 also an excavation endpoint sample

WCD File: SC18035.40

February 2019

Not to scale

Attachment