

C.T. MALE ASSOCIATES

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

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September 7, 2022

Mr. Michael Kilmer, Environmental Engineer
NYSDEC - Division of Environmental Remediation, Region 3
21 South Putt Corners Road
New Paltz, NY 12561

VIA EMAIL: Michael.kilmer@dec.ny.gov

RE: *Supplemental Remedial Investigation Work Plan (Sediment Sampling/ Dieldrin Delineation)*
Former Plessner Property NYSDEC Site No: C356053
New Paltz, New York, Ulster County
C.T. Male Project No: 15.5056

Dear Mr. Kilmer:

This letter work plan describes the scope of work proposed to complete additional surface soil sampling, to further delineate the vertical and horizontal impacts of dieldrin located in the vicinity of the monitoring wells MW-03 and MW-06, and to further evaluate the direction of groundwater flow at the above referenced site. This work plan supplement the Remedial Investigation Work Plan (RIWP) prepared by C.T. Male Associates (C.T. Male) in March 2016 on behalf of the Volunteer, Mega Funworks, Inc., for the NYSDEC Site No. C356053 and approved by the New York State Department of Environmental Conservation (NYSDEC) on April 29, 2016. This supplemental RIWP has been prepared to address the following comments received from the NYSDEC on July 21, 2022, relative to our Draft Remedial Investigation Report (RIR) dated April 2022:

- **Modification 1, Surface Soil Sampling:** Additional surface soil samples within the zero-to-two-inch interval are requested along the intersection of the wetland borders and drainage flow paths as shown in Figure 8 of the RIR. Analytes must include metals, pesticides, PCBs, SVOCs, and cyanide.
- **Modification 2, Dieldrin Delineation:** Additional soil samples are required to delineate the pesticide, dieldrin, exceedances of the protection of groundwater soil cleanup objective in the area of monitoring wells MW-03 and MW-06 which have groundwater results above standards for dieldrin.

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- **Modification 4, Groundwater Flow Direction:** Groundwater gauging of the on-site monitoring wells is required to determine the direction of flow.

The investigation will be performed in accordance with the NYSDEC Division of Environmental Remediation (DER) Technical Guidance for Site Investigation and Remediation (DER-10, May 3, 2010). Methodology, quality assurance/quality control, health and safety (including community air monitoring) and citizen participation activities will be implemented in accordance with the NYSDEC approved RIWP for the site.

Background

The Site is an irregular-shaped parcel of undeveloped land comprised of two tax parcels in the Town of New Paltz, Ulster County, New York (Section 86.12, Block 5, Lots 13.310 and 13.320). The combined parcels are approximately 57.3 acres in size, of which the BCP portion of the Site is approximately (thirty-five) 35 acres (Figure 1 – Proposed Sampling Locations). The Site is entered onto from Paradies Lane and/or from South Ohioville Road. Access to the Site is not restricted.

The Site is currently vacant but had historically been used as an orchard. Areas of the Site contain grassy fields and wooded lands but have historically been developed or used for agricultural purposes.

A Remedial Investigation (RI) has been performed for the property identified as the Former Plessner Property located on Paradies Lane in the Town of New Paltz, Ulster County, New York (herein “the Site”). The RI included the collection and analysis of shallow surface soil samples; collection and analysis of subsurface soils, evaluation of subsurface conditions via the advancement of test pits and soil borings; and the installation of monitoring wells for the collection and analysis of groundwater samples. A Draft RIR was submitted to the NYSDEC on April 16, 2022, and NYSDEC provided comments to the Draft RIR on July 21, 2022. The supplemental investigation described herein is being conducted to address NYSDEC Modifications 1, 2 and 4, described above.

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Scope of Work

Surface Soil Sampling and Analysis

To address the NYSDEC concerns specified in **Modification 1, Surface Soil Sampling**, C.T. Male will mobilize an OSHA 40-hour certified geologist to collect up to seven (7) surface soil samples within the zero-to-two-inch interval along the intersection of the wetland borders and drainage flow paths (see Figure 1, attached). Samples will be sent to a NYS ELAP certified laboratory under standard chain of custody (COC) protocol for the following analysis: Total analyte list (TAL) metals, total compound list (TCL) pesticides, polychlorinated biphenyls (PCBs), TCL semi-volatile organic compounds (SVOCs), and cyanide. Standard ten-day turnaround time and Category B deliverables will be requested on the COC. QA/QC samples will also be collected in accordance with the protocols identified in the NYSDEC approved RIWP dated March 2016.

Diieldrin Delineation

Diieldrin was reported in groundwater above standards in the monitoring wells designated as MW-03 and MW-06. As such, per **Modification 2, Diieldrin Delineation**, NYSDEC is requiring that soil samples be collected in the area surrounding those wells to delineate vertically and horizontally, to the extent practical and possible, the soils that that exceed concentrations of diieldrin above protection of groundwater Soil Cleanup Objectives (SCOs) identified in 6 NYCRR Part 375-6.8. characterization of the soils for Diieldrin SCOs will be accomplished by establishing a rough grid at approximate fifty (50) foot increments north, south, east, and west of MW-03 and MW-06. Test pits will be excavated to depths of approximately eight feet below existing ground surface and up to three (3) soil samples will be collected from each test pit as described below.

To provide vertical delineation, one sample will be obtained from the shallow soil horizon (approximately 0 to 2-foot), one from the mid-soil horizon interval (approximately 2 to 4-feet), and one from the bottom of the test pit. Samples will be sent to a NYS ELAP certified laboratory under standard chain of custody (COC) protocol for diieldrin analysis. Standard ten-day turnaround time and Category B deliverables will

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be requested on the COC. QA/QC samples will also be collected in accordance with the RIWP.

Groundwater Flow Direction

To address NYSDEC concerns identified in **Modification 4, Groundwater Flow Direction**, C.T. Male will conduct a round of groundwater level gauging of the on-site monitoring well network to evaluate the direction of groundwater flow on the site. A groundwater flow map will be developed from the data collected and presented in the supplemental RI report.

Quality Assurance/Quality Control

Samples will be collected in accordance with the Quality Assurance Project Plan (QAPP) included as Appendix B of the March 2016 RIWP. The laboratory results will be reported with NYSDEC ASP Category B deliverables, which will be subjected to NYSDEC's Data Usability Summary Report (DUSR) guidelines to determine if the data is valid and usable.

Health and Safety

All work at the Site will be completed in accordance with the Health and Safety Plan (HASP) included in Appendix C of the RIWP.

Reporting

The findings of this investigation will be presented in a supplemental RI report and submitted to NYSDEC and NYSDOH for approval. The Supplemental RI report will be attached to the RI report dated April 2022 as an addendum to the Draft RI report. We will review the results with NYSDEC and NYSDOH.

Schedule

The revised schedule for the former Plessner Property is as follows:

September 2022 Conduct Supplemental Fieldwork (described in this document)

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November 2022	Submit RIR addendum to NYSDEC/NYSDOH
December 2022	RIR Approval
June 2023	Submit Draft RAWP
December 2024	Implement Remedy
June 2025	Submit Final Engineering Report / Site Management Plan
December 2025	NYSDEC issues Certificate of Completion

Please contact me at (845) 454-4400 or k.garbarino@ctmale.com or Jim McIver at (845) 594-1788 or j.mciver@ctmale.com if you have any questions or comments. We are looking forward to getting approval of this supplemental work plan as soon as possible so that we can conduct the field work in September 2022.

Sincerely,

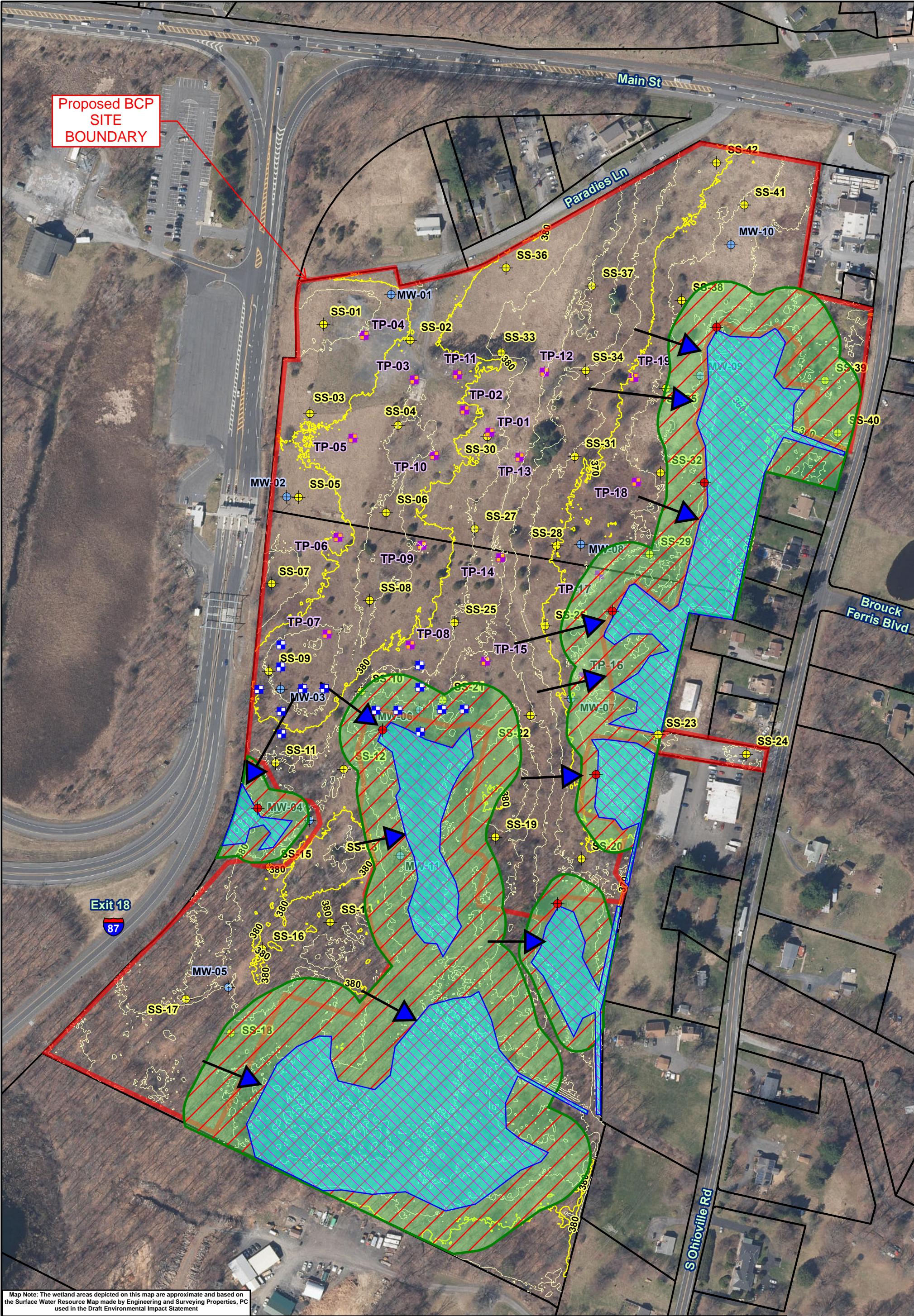
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Kristine Garbarino, P.G.
Managing Geologist

Attachments: Figure 1: Proposed Sample Location Plan

cc: S. Turk, Mega Funworks Inc. (steve@rhranch.com)
J. McIver, P.G., C.T. Male Associates (j.mciver@ctmale.com)
K. Kulow, DOH (Kristin.kulow@health.ny.gov)
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J. Brown, DEC (janet.brown@dec.ny.gov)



Map Note: The wetland areas depicted on this map are approximate and based on the Surface Water Resource Map made by Engineering and Surveying Properties, PC used in the Draft Environmental Impact Statement

0100200400

FT

1 inch = 198 feet

Drainage Direction
based on topography

Wetland Area

Wetland Buffer Zone

Monitoring Well Locations

Test Pit Locations

Ulster County Tax Parcels (2012)

Surface Soil Sampling Locations

Proposed Surface Soil Sampling Locations

Proposed Dieldrin Hotspot Testpit Sampling Locations

Project Number: 15.5056
Data Source: NYSGIS Clearinghouse
Projection: State Plane NAD83 NYE (Feet)
Date: September 2, 2022
File: Fig2_SamplingLocationMap2018_2022Edits_11x17.mxd
GIS: C. Secor/D. Landreville
Add Edits:

Map Note: The locations and features depicted on this map are approximate and do not represent a field survey.

Figure 1: Proposed Sample Location Plan

Town of New Paltz Ulster County, New York

FOUNDED IN 1910

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