

APPENDIX B
PROJECT CORRESPONDENCE

New York State Department of Environmental Conservation

Office of Environmental Quality, Region 4

1130 North Westcott Road, Schenectady, New York 12306-2014

Phone: (518) 357-2045 • Fax: (518) 357-2398

Website: www.dec.ny.gov



Joe Martens
Commissioner

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

7011 1570 0003 0363 2454

October 11, 2012

Jason W. Smith, President
Troy Belting & Supply Company
70 Cohoes Road
Watervliet, NY 12189

RE: P-site # 401067
Troy Belting and Supply Company
Watervliet, NY

Dear Mr. Smith:

The New York State Department of Environmental Conservation (NYSDEC) has reviewed subsurface investigation reports submitted recently by Sterling Environmental Engineering, P.C. (Sterling) on behalf of Troy Belting & Supply Company (Troy Belting). The reports indicate the presence of soil and groundwater contamination within the property boundaries of Troy Belting. The contaminant concentrations and the described history of solvent-type degreaser use in the motor parts cleaning operations on the property have led the NYSDEC to identify the property as a Potential Inactive Hazardous Waste Disposal Site (P-Site), as indicated above.

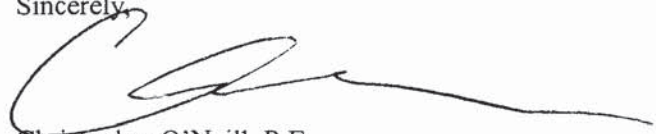
The P-site designation, pursuant to Article 27 of the New York State Environmental Conservation Law (ECL Article 27), provides for NYSDEC to evaluate the presence and significance of contamination on a property, and to direct additional data gathering for determining the appropriate classification of the property within the Remedial Programs defined by 6NYCRR Part 375. The Remedial Programs in Part 375 include the Inactive Hazardous Waste Disposal Site Program (Superfund) and the Brownfield Cleanup Program (BCP).

In accordance with ECL Article 27 and 6NYCRR Part 375, NYSDEC has determined that additional investigative and/or remedial activities are necessary to evaluate the extent and nature of contamination within and beyond the Troy Belting property boundaries. These additional activities should be performed under either the Superfund or BCP remedial program frameworks; therefore, NYSDEC hereby requests a decision from Troy Belting as to their preference in pursuing additional environmental activities under Superfund or BCP.

Please contact me with Troy Belting's decision on whether to proceed with the necessary investigative/remedial activities under Superfund or BCP by November 30, 2012. In accordance with ECL Article 27 and 6NYCRR Part 375, this office will be preparing a Superfund Class 2 (actual or potential significant threat) listing package for this site as a default position, if there is no decision from or lack of progress following the decision by Troy Belting.

Please contact Rich Ostrov, Regional Attorney, at 518-357-2090, if you have any legal questions, or me, Project Manager, at 518-357-2394 if you have any technical questions regarding this project.

Sincerely,

A handwritten signature in black ink, appearing to read 'C. O'Neill', with a long horizontal flourish extending to the right.

Christopher O'Neill, P.E.
Environmental Engineer 2

ec: J. Smith, Troy Belting
J. Greenthal, Nixon Peabody
M. Millspaugh, Sterling
J. Crua, NYSDOH
R. Ostrov, NYSDEC
K. Goertz, NYSDEC



- TROY MOTOR SERVICE
- DRIVES AND CONTROLS
- POWER TRANSMISSION
- INDUSTRIAL RUBBER
- MATERIAL HANDLING
- INDUSTRIAL SUPPLY
- POWER GENERATION
- FIELD SERVICES

February 14, 2013

Chief, Site Control Section
New York State Department of Environmental Conservation
Division of Environmental Remediation
625 Broadway
Albany, New York 12233-7020

Subject: Troy Belting & Supply Company
Brownfield Cleanup Program Application

To Whom It May Concern:

Enclosed please find one (1) hard copy and one (1) electronic copy on CD of the application by Troy Belting & Supply Company (Troy Belting) for admission into the New York State Department of Environmental Conservation (NYSDEC) Brownfield Cleanup Program (BCP).

During the last decade, Troy Belting began plans to enhance operations to increase production and employment. Troy Belting can expand its business by focusing on rebuilding larger electric motors. Our present building at 70 Cohoes Road does not have doors and ceilings with height sufficient to receive and work on larger motors. Additional floor space will also be required to expand our business. Troy Belting engaged an architect and surveyor to prepare preliminary plans for expansion of the building, but due to the economy, these initial plans were put on hold. As the economy improved, Troy Belting approached First Niagara for financing. A Phase I Environmental Site Assessment (ESA) was required and HRP Associates, Inc. was engaged for this purpose. The Phase I ESA recommended that a limited Phase II ESA be conducted to determine if there was any impact to the onsite soils and groundwater. The Phase II ESA was performed by RJS Environmental and, to my surprise, revealed the presence of volatile organic compounds (VOCs) in the soil and groundwater. As a result of the ESAs, First Niagara requested that Troy Belting address the contamination at the site before financing for the expansion is provided.

Troy Belting wants to responsibly deal with this contamination and the BCP offers a great mechanism to put Troy Belting back on track to being a leader among local firms in the Capital District.

Please contact me should you have any questions or I can be of assistance in your review in any way.

TROY BELTING & SUPPLY COMPANY

Jason Smith
President

Enclosures

cc: Keith Goertz, NYSDEC Region 4
Ruth Leistensnider, Nixon Peabody, LLP
Rodney L. Aldrich, P.E., Sterling Environmental Engineering, P.C.

2011-31\Troy Belting\Correspondence\NYSDEC_BCP Application Submittal_ltr.doc





**NEW YORK STATE
DEPARTMENT OF ENVIRONMENTAL CONSERVATION**



BROWNFIELD CLEANUP PROGRAM (BCP)

ECL ARTICLE 27 / TITLE 14

DEPARTMENT USE ONLY BCP SITE #:

07/2010

Section I. Requestor Information			
NAME Troy Belting & Supply Company			
ADDRESS 70 Cohoes Road			
CITY/TOWN Watervliet		ZIP CODE 12189	
PHONE (518) 272-4920	FAX (518) 272-0531	E-MAIL N/A	
Is the requestor authorized to conduct business in New York State (NYS)? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No -If the requestor is a Corporation, LLC, LLP or other entity requiring authorization from the NYS Department of State to conduct business in NYS, the requestor's name must appear, exactly as given above, in the <u>NYS Department of State's Corporation & Business Entity Database</u> . A print-out of entity information from the database must be submitted to DEC with the application, to document that the applicant is authorized to do business in NYS. (Included in Attachment 1)			
NAME OF REQUESTOR'S REPRESENTATIVE Jason W. Smith, President			
ADDRESS 70 Cohoes Road			
CITY/TOWN Watervliet		ZIP CODE 12189	
PHONE (518) 272-4920	FAX (518) 272-0531	E-MAIL jsmith@troybelting.com	
NAME OF REQUESTOR'S CONSULTANT Rodney Aldrich, P.E., Sterling Environmental Engineering, P.C.			
ADDRESS 24 Wade Road			
CITY/TOWN Latham		ZIP CODE 12110	
PHONE (518) 456-4900	FAX (518) 456-3532	E-MAIL rodney.aldrich@sterlingenvironmental.com	
NAME OF REQUESTOR'S ATTORNEY Ruth E. Leistensnider, Esq., Nixon Peabody LLP			
ADDRESS 677 Broadway, 10th Floor			
CITY/TOWN Albany		ZIP CODE 12207	
PHONE (518) 427-2655	FAX (866) 947-1299	E-MAIL rleistensnider@nixonpeabody.com	
THE REQUESTOR MUST CERTIFY THAT HE/SHE IS EITHER A PARTICIPANT OR VOLUNTEER IN ACCORDANCE WITH ECL 27-1405 (1) BY CHECKING ONE OF THE BOXES BELOW:			
<input checked="" type="checkbox"/> PARTICIPANT A requestor who either 1) was the owner of the site at the time of the disposal of hazardous waste or discharge of petroleum or 2) is otherwise a person responsible for the contamination, unless the liability arises solely as a result of ownership, operation of, or involvement with the site subsequent to the disposal of hazardous waste or discharge of petroleum.		<input type="checkbox"/> VOLUNTEER A requestor other than a participant, including a requestor whose liability arises solely as a result of ownership, operation of or involvement with the site subsequent to the disposal of hazardous waste or discharge of petroleum. NOTE: By checking this box, the requestor certifies that he/she has exercised appropriate care with respect to the hazardous waste found at the facility by taking reasonable steps to: i) stop any continuing discharge; ii) prevent any threatened future release; and iii) prevent or limit human, environmental, or natural resource exposure to any previously released hazardous waste.	
Requestor Relationship to Property (check one):			
<input type="checkbox"/> Previous Owner <input checked="" type="checkbox"/> Current Owner <input type="checkbox"/> Potential /Future Purchaser <input type="checkbox"/> Other _____			
If requestor is not the site owner, requestor will have access to the property throughout the BCP project. <input type="checkbox"/> Yes <input type="checkbox"/> No -Proof of site access must be submitted for non-owners			

Section II. Property Information

Check here if this application is to request significant changes to property set forth in an existing BCA:

Existing BCP site number: _____

PROPERTY NAME Troy Belting & Supply Company

ADDRESS/LOCATION 70 Cohoes Road CITY/TOWN Watervliet ZIP CODE 12189

MUNICIPALITY(IF MORE THAN ONE, LIST ALL):

Town of Colonie

COUNTY Albany SITE SIZE (ACRES) 2.4

LATITUDE (degrees/minutes/seconds) 42 ° 44 ' 40 " LONGITUDE (degrees/minutes/seconds) 73 ° 42 ' 10 "

HORIZONTAL COLLECTION METHOD: SURVEY GPS MAP HORIZONTAL REFERENCE DATUM: NAD83

COMPLETE TAX MAP INFORMATION FOR ALL TAX PARCELS INCLUDED WITHIN THE PROPERTY BOUNDARIES. ATTACH REQUIRED MAPS PER THE APPLICATION INSTRUCTIONS. **(See Attachment 2)**

Parcel Address	Parcel No.	Section No.	Block No.	Lot No.	Acreage
70 Cohoes Road, Watervliet, NY 12189	20.20-1-4	20.20	1	4	2.4

- Do the property boundaries correspond to tax map metes and bounds? Yes No
If no, please attach a metes and bounds description of the property.
- Is the required property map attached to the application? (application will not be processed without map) Yes No **(See Attachment 3)**
- Is the property part of a designated En-zone pursuant to Tax Law § 21(b)(6)? Yes No
For more information please see Empire State Development's [website](#).
If yes, identify area (name) _____
Percentage of property in En-zone (check one): 0-49% 50-99% 100%
- Is this application one of multiple applications for a large development project, where the development project spans more than 25 acres (see additional criteria in BCP application instructions)? If yes, identify name of properties in related BCP applications: Yes No

5. Property Description Narrative:
(See Attachment 4)

6. List of Existing Easements (type here or attach information)

Easement Holder	Description
(See Attachment 3)	

7. List of Permits issued by the NYSDEC or USEPA Relating to the Proposed Site (type here or attach information)

Type	Issuing Agency	Description
(See Attachment 5)		

If any changes to Section II are required prior to application approval, a new page, initialed by each requestor, must be submitted.

Initials of each Requestor: _____

Section III. Current Property Owner/Operator Information

OWNER'S NAME Troy Belting & Supply Company

ADDRESS 70 Cohoes Road

CITY/TOWN Watervliet ZIP CODE 12189

PHONE (518) 272-4920 FAX (518) 272-0531 E-MAIL jsmith@troybelting.com

OPERATOR'S NAME Same as Above

ADDRESS

CITY/TOWN ZIP CODE

PHONE FAX E-MAIL

Section IV. Requestor Eligibility Information (Please refer to ECL § 27-1407)

If answering "yes" to any of the following questions, please provide an explanation as an attachment.

1. Are any enforcement actions pending against the requestor regarding this site? Yes No
2. Is the requestor subject to an existing order relating to contamination at the site? Yes No
3. Is the requestor subject to an outstanding claim by the Spill Fund for this site? Yes No
4. Has the requestor been determined to have violated any provision of ECL Article 27? Yes No
5. Has the requestor previously been denied entry to the BCP? Yes No
6. Has the requestor been found in a civil proceeding to have committed a negligent or intentionally tortious act involving contaminants? Yes No
7. Has the requestor been convicted of a criminal offense that involves a violent felony, fraud, bribery, perjury, theft, or offense against public administration? Yes No
8. Has the requestor knowingly falsified or concealed material facts or knowingly submitted or made use of a false statement in a matter before the Department? Yes No
9. Is the requestor an individual or entity of the type set forth in ECL 27-1407.8(f) that committed an act or failed to act, and such act or failure to act could be the basis for denial of a BCP application? Yes No

Section V. Property Eligibility Information (Please refer to ECL § 27-1405)

1. Is the property, or was any portion of the property, listed on the National Priorities List? Yes No
If yes, please provide relevant information as an attachment.
2. Is the property, or was any portion of the property, listed on the NYS Registry of Inactive Hazardous Waste Disposal Sites? Yes No
If yes, please provide: Site # _____ Class # _____
3. Is the property subject to a permit under ECL Article 27, Title 9, other than an Interim Status facility? Yes No
If yes, please provide: Permit type: _____ EPA ID Number: _____
Date permit issued: _____ Permit expiration date: _____
4. Is the property subject to a cleanup order under navigation law Article 12 or ECL Article 17 Title 10? Yes No
If yes, please provide: Order # _____
5. Is the property subject to a state or federal enforcement action related to hazardous waste or petroleum? Yes No
If yes, please provide explanation as an attachment.

Section VI. Project Description

What stage is the project starting at? Investigation Remediation

Please attach a description of the project which includes the following components:

- Purpose and scope of the project **(See Attachment 6)**
- Estimated project schedule

Section VII. Property's Environmental History

To the extent that existing information/studies/reports are available to the requestor, please attach the following:

1. Environmental Reports (See Attachment 7)

A Phase I environmental site assessment report prepared in accordance with ASTM E 1527 (American Society for Testing and Materials: Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process), and all environmental reports related to contaminants on or emanating from the site.

If a final investigation report is included, indicate whether it meets the requirements of ECL Article 27-1415(2): Yes No

2. SAMPLING DATA: INDICATE KNOWN CONTAMINANTS AND THE MEDIA WHICH ARE KNOWN TO HAVE BEEN AFFECTED. LABORATORY REPORTS SHOULD BE REFERENCED AND COPIES INCLUDED.

Contaminant Category	Soil	Groundwater	Surface Water	Sediment	Soil Gas
Petroleum					
Chlorinated Solvents	x	x			
Other VOCs					
SVOCs	x	x			
Metals	x	x			
Pesticides					
PCBs					
Other*					

*Please describe: (See Attachment 8)

3. SUSPECTED CONTAMINANTS: INDICATE SUSPECTED CONTAMINANTS AND THE MEDIA WHICH MAY HAVE BEEN AFFECTED. PROVIDE BASIS FOR ANSWER AS AN ATTACHMENT. None

Contaminant Category	Soil	Groundwater	Surface Water	Sediment	Soil Gas
Petroleum					
Chlorinated Solvents					
Other VOCs					
SVOCs					
Metals					
Pesticides					
PCBs					
Other*					

*Please describe:

4. INDICATE KNOWN OR SUSPECTED SOURCES OF CONTAMINANTS (CHECK ALL THAT APPLY). PROVIDE BASIS FOR ANSWER AS AN ATTACHMENT. (See Attachment 8)

- Above Ground Pipeline or Tank
 Lagoons or Ponds
 Underground Pipeline or Tank
 Surface Spill or Discharge
 Routine Industrial Operations
 Dumping or Burial of Wastes
 Septic tank/lateral field
 Adjacent Property
 Drums or Storage Containers
 Seepage Pit or Dry Well
 Foundry Sand
 Electroplating
 Coal Gas Manufacture
 Industrial Accident
 Unknown

Other:

5. INDICATE PAST LAND USES (CHECK ALL THAT APPLY):

- Coal Gas Manufacturing
 Manufacturing
 Agricultural Co-op
 Dry Cleaner
 Salvage Yard
 Bulk Plant
 Pipeline
 Service Station
 Landfill
 Tannery
 Electroplating
 Unknown

Other: Electrical Motor Rewinding

6. PROVIDE A LIST OF PREVIOUS PROPERTY OWNERS AND OPERATORS WITH NAMES, LAST KNOWN ADDRESSES AND TELEPHONE NUMBERS AS AN ATTACHMENT. DESCRIBE REQUESTOR'S RELATIONSHIP, IF ANY, TO EACH PREVIOUS OWNER AND OPERATOR. IF NO RELATIONSHIP, PUT "NONE".

(See Attachment 9)

Section VIII. Contact List Information**(See Attachment 9 for Section VIII)**

Please attach, at a minimum, the names and addresses of the following:

1. The chief executive officer and planning board chairperson of each county, city, town and village in which the property is located.
2. Residents, owners, and occupants of the property and properties adjacent to the property.
3. Local news media from which the community typically obtains information.
4. The public water supplier which services the area in which the property is located.
5. Any person who has requested to be placed on the contact list.
6. The administrator of any school or day care facility located on or near the property.
7. The location of a document repository for the project (e.g., local library). In addition, attach a copy of a letter sent to the repository acknowledging that it agrees to act as the document repository for the property.

Section IX. Land Use Factors (Please refer to ECL § 27-1415(3))**(See Attachment 9 for detailed explanations)**

1. Current Use: Residential Commercial Industrial Vacant Recreational (check all that apply)
Provide summary of business operations as an attachment.

2. Intended Use Post Remediation: Unrestricted Residential Commercial Industrial (check all that apply)
Provide specifics as an attachment.

3. Do current historical and/or recent development patterns support the proposed use? (See #14 below re: discussion of area land uses)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
--	---

4. Is the proposed use consistent with applicable zoning laws/maps?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
---	---

5. Is the proposed use consistent with applicable comprehensive community master plans, local waterfront revitalization plans, designated Brownfield Opportunity Area plans, other adopted land use plans?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
--	---

6. Are there any Environmental Justice Concerns? (See §27-1415(3)(p)).	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
--	---

7. Are there any federal or state land use designations relating to this site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
--	---

8. Do the population growth patterns and projections support the proposed use?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
--	---

9. Is the property accessible to existing infrastructure?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
---	---

10. Are there important cultural resources, including federal or state historic or heritage sites or Native American religious sites within ½ mile?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
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11. Are there important federal, state or local natural resources, including waterways, wildlife refuges, wetlands, or critical habitats of endangered or threatened species within ½ mile?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
---	---

12. Are there floodplains within ½ mile?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
--	---

13. Are there any institutional controls currently applicable to the property?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
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14. Describe the proximity to real property currently used for residential use, and to urban, commercial, industrial, agricultural, and recreational areas in an attachment. **(See Attachment 9)**

15. Describe the potential vulnerability of groundwater to contamination that might migrate from the property, including proximity to wellhead protection and groundwater recharge areas in an attachment. **(See Attachment 9)**

16. Describe the geography and geology of the site in an attachment. **(See Attachment 9)**

Section X. Statement of Certification and Signatures

(By requestor who is an individual)

If this application is approved, I acknowledge and agree to the general terms and conditions set forth in DER-32 *Brownfield Cleanup Program Applications and Agreements* and to execute a Brownfield Cleanup Agreement (BCA) within 60 days of the date of DEC's approval letter. I also agree that in the event of a conflict between the general terms and conditions of participation set forth in DER-32 and the terms contained in a site-specific BCA, the terms in the BCA shall control. I hereby affirm that information provided on this form and its attachments is true and complete to the best of my knowledge and belief. I am aware that any false statement made herein is punishable as a Class A misdemeanor pursuant to section 210.45 of the Penal Law.

Date: _____ Signature: _____ Print Name: _____

(By an requestor other than an individual)

I hereby affirm that I am President Troy Belting & Supply Co. (title) of Supply Co. (entity); that I am authorized by that entity to make this application; that this application was prepared by me or under my supervision and direction. If this application is approved, I acknowledge and agree to the general terms and conditions set forth in DER-32 *Brownfield Cleanup Program Applications and Agreements* and to execute a Brownfield Cleanup Agreement (BCA) within 60 days of the date of DEC's approval letter. I also agree that in the event of a conflict between the general terms and conditions of participation set forth in DER-32 and the terms contained in a site-specific BCA, the terms in the BCA shall control. I hereby affirm that information provided on this form and its attachments is true and complete to the best of my knowledge and belief. I am aware that any false statement made herein is punishable as a Class A misdemeanor pursuant to Section 210.45 of the Penal Law.

Date: 2/14/2013 Signature:  Print Name: Jason W. Smith

SUBMITTAL INFORMATION:

Three (3) complete copies are required.

- Two (2) copies, one paper copy with original signatures and one electronic copy in Portable Document Format (PDF) on a CD, must be sent to:

Chief, Site Control Section
New York State Department of Environmental Conservation
Division of Environmental Remediation
625 Broadway
Albany, NY 12233-7020

- One (1) paper copy must be sent to the DEC regional contact in the regional office covering the county in which the site is located. Please check our [website](#) for the address of our regional offices.

FOR DEPARTMENT USE ONLY

BCP SITE T&A CODE: _____ LEAD OFFICE: _____

New York State Department of Environmental Conservation
Division of Environmental Remediation
Bureau of Technical Support, 11th Floor
625 Broadway, Albany, NY 12233-7020
Phone: (518) 402-9543 • Fax: (518) 402-9547
Website: www.dec.ny.gov



Joe Martens
Commissioner

MAR 25 2013

Mr. Jason W. Smith
President
Troy Belting & Supply Company
70 Cohoes Road
Watervliet, New York 12189

RE: Brownfield Cleanup Application
Troy Belting & Supply Company
BCP ID C401067

Dear Mr. Smith:

The New York State Department of Environmental Conservation (Department) has received your application for participation in the Brownfield Cleanup Program (BCP) pursuant to Environmental Conservation Law (ECL) §27-1400 et seq. We are pleased to advise you that your application has been determined to be complete based upon the Department's initial non-substantive review of your application package. The record with respect to your submittal pursuant to ECL 27-1407.1 is complete. If you propose additional material to supplement this application, the Department may consider it at its sole discretion. If the Department allows you to supplement your application with additional written material that clarifies current information or provides new information, you will be required to publish another public notice of the availability of the complete application (only very minor information may be accepted without the need for publishing a new public notice). The Department will then adjust the time frame specified under ECL 27-1407.6 for notifying you that your request for participation in the BCP is either accepted or rejected.

Pursuant to ECL§27-1407(5), a 30-day public comment period is to begin after the Department's determination that an application is complete. The Department will publish a notice of the receipt of your application seeking public comment in the "Environmental Notice Bulletin." In accordance with the ECL and Department regulations (see 6 NYCRR 375-3.4(b)), you must notify, in writing, all parties on the site contact list¹ of the availability of the complete application for public review and comment.

In order to facilitate the notifications, the Department has prepared the enclosed document for your use as a Public Notice along with instructions and the location of the document repository. You are responsible for placing a copy of the application (including any attachments) and copies of all other related documents such as any site assessments, investigation reports, and/or remedial work plans in the repository before the start of the public comment period. The language in the enclosed Public Notice must be used without alteration in the newspaper notice that you have published in accordance with §§375-3.2(f) and 375-3.10.

¹ The site contact list includes (see subdivision 375-1.2(as)) all interested "persons, government agencies, groups or organizations, including, but not limited to, the chief executive officer and zoning board of each county, city, town and village in which such site is located, the public water supplier which serves the area in which such site is located, any site residents, adjacent property owners, any person who has requested to be placed on the site contact list, and the administrator of any school or day care facility located on the site for the purposes of posting and/or dissemination at the facility. Provided, however, that where the site or adjacent real property contains multiple dwelling units, the remedial party may propose an alternative method, consistent with the citizen participation goals set forth in section 375-1.10, for providing such notice in lieu of mailing to each individual."


The enclosed public notice must be provided to a local newspaper servicing the area including the site for publication no later than April 10, 2013. By April 9, 2013, the other notifications specified above must be distributed and documents placed in the repository. To the extent that the mailings and publications are not completed in accordance with these time frames, the Department will extend the comment period for a period sufficient to comply with the required public notice requirements running from the latest of these mailings and publications.

Within five days of the mailings you must submit to the Department a "certificate of mailing" using the enclosed form. Additionally, you must submit a proof of publication provided by the newspaper within three days of your receipt of such document. Please submit these documents to the Department's Project Manager:

Christopher O'Neill
Project Manager
NYS Department of Environmental Conservation – Region 4
1130 N. Westcott Road
Schenectady, New York 12306

The Department will use all best efforts to notify you if the application is accepted or rejected within five days after the close of the public comment period. We look forward to working cooperatively to address the environmental conditions at the brownfield site and return this property to productive use.

Sincerely,


for Kelly A. Lewandowski, P.E.
Chief
Site Control Section

Enclosures

ec w/enc.: Christopher O'Neill, Project Manager
Robert Cozy, Director, Remedial Bureau B
James Quinn, RHWRE, Region 4
Michael Caruso, NYSDEC – OGC, Materials Management and Remediation Bureau
Jill Phillips, NYSDEC – OGC – Region 4
Krista Anders, NYSDOH
Rodney Aldrich, P.E. Sterling Environmental Engineering, P.C.
Ruth E. Leistensnider, Esq., Nixon Peabody LLP
Sara Heigel, Site Control Section

**Brownfield Cleanup Program
Public Notice Instructions to Requestor¹**

1. Newspaper Notice

- a) The Requestor must publish the language in the enclosed public notice, without modification, in a local newspaper of general circulation that services the area that includes the site not later than the date specified in the Division of Environmental Remediation's (DER) cover letter. The notice must be located prominently in the community bulletin section or comparable local section of the newspaper (not as a legal notice). The Requestor must publish the notice in English and in any other language spoken by a significant number of people within the site community.
- b) The Requestor must submit a proof of publication of the newspaper notice to DER by the date specified in the DER cover letter.

2. Requestor's Instructions to Newspapers Regarding Printing the Public Notice

- a) The enclosed public notice announces the receipt of a complete Brownfield Cleanup Program application package by the New York State Department of Environmental Conservation. Pursuant to ECL Section 27-1407(5), the public notice must be located prominently in the community bulletin section or similar local section of the newspaper (not as a legal notice). The public notice must be published by the date specified. Please provide a proof of publication as soon as possible.

3) Site Contact List

- a) The Requestor must mail the enclosed public notice, without modification, to the parties on the site contact list included with the application. The mailing must be performed by the date specified in the DER cover letter. No other materials can be mailed with this notice.
- b) The Requestor must complete the certificate of mailing and submit it to DER by the date specified in the DER cover letter (see enclosed certificate of mailing form).

4) Requestor's Instructions to Parties on the Site Contact List Receiving the Public Notice

- a) The enclosed public notice announces the receipt of a complete Brownfield Cleanup Program application package by the New York State Department of Environmental Conservation. Pursuant to ECL Section 27-1407(5), a public notice announcing the receipt of an application must be sent to parties on the site contact list. Please read the enclosed public notice and review the application package in the site document repository for further information regarding the application and how to submit comments.

5. Document Repository

- a) The Requestor must put the application package (application and all attachments) in the site document repository specified in the application prior to the start of the public comment period.

¹ A requestor (§375-3.2(i)) is a person who has submitted an application to participate in the BCP whose eligibility has not yet been determined by the Department of Environmental Conservation.

Public Notice

The New York State Department of Environmental Conservation (DEC) has received a Brownfield Cleanup Program (BCP) application from Troy Belting & Supply Company for a site known as the Troy Belting & Supply Company, site ID #C401067. This site is located in the Town of Colonie, within the County of Albany, and is located at 70 Cohoes Road, Watervliet, NY 12189. Comments regarding this application must be submitted no later than May 10, 2013. Information regarding the site, the application, and how to submit comments can be found at <http://www.dec.ny.gov/chemical/60058.html> or send comments to Christopher O'Neill, Project Manager, NYSDEC-Region 4, 1130 N. Westcott Road, Schenectady, NY 12306; 518-357-2394; or cxoneill@gw.dec.state.ny.us

To have information such as this notice sent right to your email, sign up with county email listservs available at www.dec.ny.gov/chemical/61092.html .

CERTIFICATION OF MAILING

SITE NAME: Troy Belting & Supply Company
SITE NO. C401067

I certify that I mailed on _____ a copy of the attached
_____ by first class mail upon the person(s) on the attached mailing list, by
depositing a true copy thereof, securely enclosed in a postpaid wrapper, in the Post Office box at
_____ in the City of
_____, New York, which box is under the exclusive care and custody
of the United States Post Office.

Signature

Date

**Troy Belting & Supply Company
C401067**

The Times Union
News Plaza, Box 15000
Albany, NY 12212

The Spotlight Newspapers
125 Adams Street
Delmar, NY 12054

The Record
501 Broadway
Troy, NY 12181

The Daily Gazette
2345 Maxon Road
Schenectady, NY 12308

Chair, Albany County Legislature
Albany County
112 State Street, RM 710
Albany, NY 12207

Albany County Executive
112 State Street, RM 200
Albany, NY 12207

County Clerk
Albany County
32 North Russell Road
Albany, NY 12206

Dept. of Economic Development,
Conservation and Planning
Albany County
112 State Street, Room 720
Albany, NY 12207

Mayor
City of Watervliet
City Hall
2 Fifteenth Street
Watervliet, NY 12189

City Council Chair
City of Watervliet
Watervliet City Hall
Watervliet, NY 12189

Colonie Town Supervisor
Memorial Town Hall
534 Loudon Road
Newtonville, NY 12128

Town Clerk
Town of Colonie
Memorial Town Hall
534 Loudon Road
Newtonville, NY 12128

Town of Colonie
Division of Environmental Services
1319 Loudon Road
Cohoes, NY 12047

William K. Sanford Town Library
629 Albany Shaker Road
Loudonville, NY 12211

Director
Citizens Environmental Coalition
33 Central Avenue
Albany, NY 12210

Mayor
Village of Green Island
20 Clinton Street
Green Island, NY 12183

Commissioner
Albany County Health Department
175 Green Street
Albany, NY 12202

Commissioner
Albany County Dept. of Public Works
449 New Salem Road
Voorheesville, NY 12168

Watervliet Public Library
1501 Broadway
Watervliet, NY 12189

Green Island Water Department
Village Hall
20 Clinton Street
Green Island, NY 12183

Principal
Maplewood Elementary School
32 Cohoes Road
Watervliet, NY 12189

Principal
Heatly School
171 Hudson Avenue
Green Island, NY 12183

Kanda Panda Day Care
136 George Street
Green Island, NY 12183

Jason W. Smith, President
Troy Belting & Supply Company
70 Cohoes Road
Watervliet, NY 12189

John Greenthal
Nixon Peabody LLP
10th Floor
677 Broadway
Albany, NY 12207

Mark P. Millsbaugh
Sterling Environmental Engineering, P.C.
24 Wade Road
Latham, NY 12110

Christopher O'Neill
NYS Dept. of Environmental Conservation
1130 N. Westcott Road
Schenectady, NY 12306

Current Occupant
State Route 32
94 Cohoes Road
Watervliet, NY 12189

Current Occupant
State Route 32
92 Cohoes Road
Watervliet, NY 12189

Current Occupant
State Route 32
90 Cohoes Road
Watervliet, NY 12189

Current Occupant
State Route 32
88 Cohoes Road
Watervliet, NY 12189

Current Occupant
State Route 32
86 Cohoes Road
Watervliet, NY 12189

Current Occupant
State Route 32
84 Cohoes Road
Watervliet, NY 12189

Current Occupant
State Route 32
82 Cohoes Road
Watervliet, NY 12189

Current Occupant
State Route 32
80 Cohoes Road
Watervliet, NY 12189

Current Occupant
State Route 32
76 Cohoes Road
Watervliet, NY 12189

Current Occupant
State Route 32
74 Cohoes Road
Watervliet, NY 12189

Current Occupant
State Route 32
Apt 1
72 Cohoes Road
Watervliet, NY 12189

Current Occupant
State Route 32
Apt 2
72 Cohoes Road
Watervliet, NY 12189

Current Occupant
State Route 32
Apt 3
72 Cohoes Road
Watervliet, NY 12189

Current Occupant
State Route 32
Apt 4
72 Cohoes Road
Watervliet, NY 12189

Current Occupant
7 Guy Lane
Watervliet, NY 12189

Current Occupant
State Route 32
68 Cohoes Road
Watervliet, NY 12189

Current Occupant
State Route 32
66 Cohoes Road
Watervliet, NY 12189

Current Occupant
State Route 32
Apt 1
64 Cohoes Road
Watervliet, NY 12189

Current Occupant
State Route 32
Apt 2
64 Cohoes Road
Watervliet, NY 12189

Current Occupant
State Route 32
Apt 1
62 Cohoes Road
Watervliet, NY 12189

Current Occupant
State Route 32
Apt 2
62 Cohoes Road
Watervliet, NY 12189

Current Occupant
State Route 32
Apt 1
60 Cohoes Road
Watervliet, NY 12189

Current Occupant
State Route 32
Apt 2
60 Cohoes Road
Watervliet, NY 12189

Current Occupant
State Route 32
18 Springwood Manor Drive
Loudonville, NY 12211

Current Occupant
State Route 32
Apt 1
58 Cohoes Road
Watervliet, NY 12189

Current Occupant
State Route 32
Apt 2
58 Cohoes Road
Watervliet, NY 12189

Current Occupant
State Route 32
Apt 1
56 Cohoes Road
Watervliet, NY 12189

Current Occupant
State Route 32
Apt 2
56 Cohoes Road
Watervliet, NY 12189

56 Cohoes Rd. LLC
56 Osborne Road
Colonie, NY 12205

Current Occupant
State Route 32
54 Cohoes Road
Watervliet, NY 12189

Current Occupant
State Route 32
52 Cohoes Road
Watervliet, NY 12189

Current Occupant
State Route 32
50 Cohoes Road
Watervliet, NY 12189

Current Occupant
State Route 32
48 Cohoes Road
Watervliet, NY 12189

Current Occupant
State Route 32
46 Cohoes Road
Watervliet, NY 12189

Current Occupant
State Route 32
44 Cohoes Road
Watervliet, NY 12189

Current Occupant
22 Riverside Drive
Stillwater, NY 12170

Current Occupant
State Route 32
Apt A
41 Cohoes Road
Watervliet, NY 12189

Current Occupant
State Route 32
Apt B
41 Cohoes Road
Watervliet, NY 12189

Current Occupant
State Route 32
Apt C
41 Cohoes Road
Watervliet, NY 12189

Current Occupant
State Route 32
Apt A
43 Cohoes Road
Watervliet, NY 12189

Current Occupant
State Route 32
Apt B
43 Cohoes Road
Watervliet, NY 12189

Current Occupant
State Route 32
Apt A
45 Cohoes Road
Watervliet, NY 12189

Current Occupant
State Route 32
Apt B
45 Cohoes Road
Watervliet, NY 12189

Current Occupant
State Route 32
Apt A
47 Cohoes Road
Watervliet, NY 12189

Current Occupant
State Route 32
Apt B
47 Cohoes Road
Watervliet, NY 12189

Current Occupant
State Route 32
Apt A
49 Cohoes Road
Watervliet, NY 12189

Current Occupant
State Route 32
Apt B
49 Cohoes Road
Watervliet, NY 12189

Current Occupant
State Route 32
Apt A
51 Cohoes Road
Watervliet, NY 12189

Current Occupant
State Route 32
Apt B
51 Cohoes Road
Watervliet, NY 12189

Current Occupant
State Route 32
Apt A
53 Cohoes Road
Watervliet, NY 12189

Current Occupant
State Route 32
Apt B
53 Cohoes Road
Watervliet, NY 12189

Current Occupant
8 Cohoes Road
Watervliet, NY 12189

Current Occupant
State Route 32
55 Cohoes Road
Watervliet, NY 12189

Current Occupant
690 Western Avenue
Albany, NY 12203

Current Occupant
State Route 32
Apt A
59 Cohoes Road
Watervliet, NY 12189

Current Occupant
State Route 32
Apt B
59 Cohoes Road
Watervliet, NY 12189

Attn: Robert Comproski, Jr., President
Maplewood Fire Department
State Route 32
61 Cohoes Road
Watervliet, NY 12189

Current Occupant
State Route 32
63 Cohoes Road
Watervliet, NY 12189

Current Occupant
24 Windham Drive
Southington, CT 06489

Current Occupant
State Route 32
Apt 1
67 Cohoes Road
Watervliet, NY 12189

Current Occupant
State Route 32
Apt 2
67 Cohoes Road
Watervliet, NY 12189

Current Occupant
State Route 32
Apt 3
67 Cohoes Road
Watervliet, NY 12189

Current Occupant
84 Cohoes Road
Watervliet, NY 12189

Current Occupant
State Route 32
Apt 1
69 Cohoes Road
Watervliet, NY 12189

Current Occupant
State Route 32
Apt 2
69 Cohoes Road
Watervliet, NY 12189

Current Occupant
State Route 32
71 Cohoes Road
Watervliet, NY 12189

Current Occupant
State Route 32
73 Cohoes Road
Watervliet, NY 12189

Current Occupant
34 Galileo Way
Latham, NY 12110

Current Occupant
State Route 32
77 Cohoes Road
Watervliet, NY 12189

Current Occupant
State Route 32
79 Cohoes Road
Watervliet, NY 12189

Current Occupant
State Route 32
81 Cohoes Road
Watervliet, NY 12189

Current Occupant
4 Elm Street
Watervliet, NY 12189

Current Occupant
68 Cohoes Road
Watervliet, NY 12189

Current Occupant
8 Elm Street
Watervliet, NY 12189

Current Occupant
Apt A
10 Elm Street
Watervliet, NY 12189

Current Occupant
Apt B
10 Elm Street
Watervliet, NY 12189

Current Occupant
12 Elm Street
Watervliet, NY 12189

Current Occupant
14 Elm Street
Watervliet, NY 12189

Troy Belting and Supply Company
9 Elm Street
Watervliet, NY 12189

Attn: E. J. Cardish
Cardish Machine Works LTD
17 Elm Street
Watervliet, NY 12189

Current Occupant
2 Arch Street
Watervliet, NY 12189

Current Occupant
Apt A
4 Arch Street
Watervliet, NY 12189

Current Occupant
Apt B
4 Arch Street
Watervliet, NY 12189

Current Occupant
Apt C
4 Arch Street
Watervliet, NY 12189

Current Occupant
Apt D
4 Arch Street
Watervliet, NY 12189

Current Occupant
17 Wellesley Court
Loudonville, NY 12211

Current Occupant
Apt 1
6 Arch Street
Watervliet, NY 12189

Current Occupant
Apt 2
6 Arch Street
Watervliet, NY 12189

Current Occupant
Apt 1
8 Arch Street
Watervliet, NY 12189

Current Occupant
Apt 2
8 Arch Street
Watervliet, NY 12189

Current Occupant
88 Cohoes Road
Watervliet, NY 12189

National Grid
300 Erie Boulevard West
Syracuse, NY 13202

HD Supply/Ramsco
14 Arch Street
Watervliet, NY 12189

Current Occupant
14 Arch Street
Watervliet, NY 12189

Shear Beauty Salon
1 Arch Street
Watervliet, NY 12189

Current Occupant
10 Abby Road
Latham, NY 12110

Current Occupant
3 Arch Street
Watervliet, NY 12189

Current Occupant
Apt A
5 Arch Street
Watervliet, NY 12189

Current Occupant
Apt B
5 Arch Street
Watervliet, NY 12189

Current Occupant
7 Arch Street
Watervliet, NY 12189

The Structured Companies LLC
11 Arch Street
Watervliet, NY 12189

Current Occupant
21 Arch Street
Watervliet, NY 12189

Current Occupant
PO Box 4087
Albany, NY 12204

Current Occupant
12 Guy Lane
Watervliet, NY 12189

Current Occupant
14 Guy Lane
Watervliet, NY 12189

Current Occupant
16 Guy Lane
Watervliet, NY 12189

Current Occupant
7 Guy Lane
Watervliet, NY 12189

Current Occupant
11 Guy Lane
Watervliet, NY 12189

Current Occupant
6 Maple Avenue
Watervliet, NY 12189

Current Occupant
8 Maple Avenue
Watervliet, NY 12189

Current Occupant
5 Maple Avenue
Watervliet, NY 12189

Current Occupant
7 Maple Avenue
Watervliet, NY 12189

Current Occupant
9 Maple Avenue
Watervliet, NY 12189

Current Occupant
6 Montgomery Way
Clifton Par, NY 12065

Current Occupant
15 Maple Avenue
Watervliet, NY 12189

Current Occupant
17 Maple Avenue
Watervliet, NY 12189

Attn: Thomas VanVranken
Environmental Director
Norlite Corp.
628 S. Saratoga Street
Cohoes, NY 12047

Comfortex
21 Elm Street
Watervliet, NY 12189

New York State Department of Environmental Conservation

Office of Environmental Quality, Region 4

1130 North Westcott Road, Schenectady, New York 12306-2014

Phone: (518) 357-2045 • Fax: (518) 357-2398

Website: www.dec.ny.gov



Joe Martens
Commissioner

August 8, 2013

Troy Belting and Supply Company
Attn: Jason W. Smith
70 Cohoes Road
Watervliet, NY 12189

**RE: BCP Site No. C401067
Troy Belting and Supply Company
70 Cohoes Road, Watervliet**

Dear Mr. Smith:

In accordance with the Brownfield Cleanup Agreement (Index No. C401067-05-13) for the above-referenced Brownfield Cleanup Project at your 70 Cohoes Road facility, please note that there have been a couple of changes for the project contact persons. Ms. Maureen Schuck has replaced Ms. Anders as the Department of Health's contact person, and Mr. Rich Ostrov has replaced Ms. Phillips as the DEC's project attorney. Their contact information is detailed below:

Maureen Schuck (electronic copy only)
NYS Dept. of Health
Bureau of Environmental Exposure Investigation
Empire State Plaza
Corning Tower Room 1787
Albany, NY 12237
(518) 402-7860
BEEI@health.state.ny.us

Rich Ostrov, Esq. (correspondence only)
NYS Dept. of Environmental Conservation
Office of General Counsel
1130 North Westcott Road
Schenectady, NY 12306
(518) 357-2090
rxostrov@gw.dec.state.ny.us

I can be reached at 518-357-2394 if there are any questions.

Sincerely,

Christopher O'Neill, P.E.
Environmental Engineer 2

CO:lg\Aug.2013-DEC and DOH contacts update.doc

ec: J. Smith, Troy Belting
R. Leistensnider, Nixon Peabody
R. Aldrich, Sterling Environmental
M. Schuck, NYSDOH
R. Ostrov, NYSDEC
J. Quinn, NYSDEC

New York State Department of Environmental Conservation

Office of Environmental Quality, Region 4

1130 North Westcott Road, Schenectady, New York 12306-2014

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Website: www.dec.ny.gov



Joe Martens
Commissioner

September 24, 2013

Troy Belting and Supply Company
Attn: Jason W. Smith
70 Cohoes Road
Watervliet, NY 12189

RE: BCP Site No. C401067
Troy Belting and Supply Company
70 Cohoes Road, Watervliet

Dear Mr. Smith:

The New York State Department of Environmental Conservation (NYSDEC) and New York State Department of Health (NYSDOH) have reviewed the September 17, 2013 Revised Citizen Participation Plan (Revised CP Plan) for the Troy Belting and Supply Company (Troy Belting) Brownfield Cleanup Program (BCP) site. The Revised CP Plan was prepared by Sterling Environmental Engineering, P.C. (Sterling Environmental) on behalf of Troy Belting.

NYSDEC and NYSDOH hereby approve of the September 17, 2013 Revised CP Plan, as it has satisfactorily addressed our comments on the previous version. Please provide a copy of the September 17, 2013 Revised CP Plan to the William K. Sanford Town Library for the site's document repository.

NYSDEC and NYSDOH would like to schedule a site visit to walk about the inside and outside of the facility. The site visit will be helpful for the review of the revised Remedial Investigation Work Plan due to be submitted in the near future. The suggested site visit date is Friday October 4, 2013. Please let me know if this date or another works best for you and/or your environmental consultants.

I can be reached at 518-357-2394 if there are any questions.

Sincerely,

Christopher O'Neill, P.E.
Environmental Engineer 2

EC: J. Smith, Troy Belting
R. Leistensnider, Nixon Peabody
R. Aldrich, Sterling Environmental
M. Schuck, NYSDOH
R. Ostrov, NYSDEC
J. Quinn, NYSDEC

New York State Department of Environmental Conservation

Office of Environmental Quality, Region 4

1130 North Westcott Road, Schenectady, New York 12306-2014

Phone: (518) 357-2045 • Fax: (518) 357-2398

Website: www.dec.ny.gov



Joe Martens
Commissioner

December 3, 2013

Troy Belting and Supply Company
Attn: Jason W. Smith
70 Cohoes Road
Watervliet, NY 12189

RE: BCP Site No. C401067
Troy Belting and Supply Company
70 Cohoes Road, Watervliet

Dear Mr. Smith:

The New York State Department of Environmental Conservation (NYSDEC) and New York State Department of Health (NYSDOH) have reviewed the preliminary results from the soil vapor and indoor air sampling performed at a neighboring residential property. The preliminary data was submitted on your behalf by Sterling Environmental Engineering, P.C. (Sterling) in a letter dated November 15, 2013. NYSDEC has conversed with NYSDOH and Sterling regarding the sampling data and the next steps forward.

Sterling's November 15, 2013 cover letter for the preliminary data recommends re-sampling of the residential building and acknowledges that the data indicates mitigation is necessary according to NYSDOH soil vapor intrusion (SVI) guidance.

NYSDEC/NYSDOH are concerned that re-sampling will delay the response in mitigating the apparent on-going soil vapor intrusion. Final determination of the need for SVI mitigation will be made based on validated, not preliminary, laboratory data and parcel-specific factors such as product inventory sheets and building structural details. Sterling has indicated that validated data should be available on or about December 10, 2013, and that re-sampling and its associated preliminary data could be done within a week. NYSDEC/NYSDOH will not prohibit the sampling if Troy Belting and Supply Company (Troy Belting) wants to perform a second round of SVI sampling utilizing the same procedures and protocols as were used in the November 4-6, 2013 sampling event. The second round of sampling would need an outdoor ambient air sample added to the previously-sampled locations, and NYSDOH advises that the basement dirt floor sub-surface air sample could be eliminated from the proposed second round of SVI sampling. Quick (for example, 24-hour) turnaround would be needed for the laboratory preliminary results. Please note that if the second round of sampling data suggests contaminant concentrations in conflict with the initial sampling data, then it is likely that a third round of sampling would be necessary, to confirm either of the first two data sets, before a final decision on the need for mitigation could be made.

In reaction to the preliminary data, NYSDEC/NYSDOH requests that Troy Belting begin developing an Interim Remedial Measures (IRM) Work Plan to address the apparent SVI impacts on the sampled residential building. The IRM Work Plan should also include SVI sampling for additional neighboring buildings to the north and east of Troy Belting's parcel. Implementation of the IRM Work Plan would depend upon the evaluation of the validated SVI data as indicated above, but potentially would

be implemented sooner than the pending Remedial Investigation (RI) Work Plan covering all environmental media.

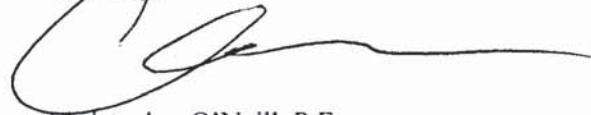
During the development of the IRM Work Plan for SVI activities, discussions may be appropriate regarding the details of removing/controlling contaminated air in the residential building basement, and subsequent first floor apartments. NYSDEC/NYSDOH recommend consultation with a highly-experienced radon/SVI mitigation person due to the relatively unique design of the residential building basement, with its dirt floor, shallow bedrock, crawl spaces, etc. NYSDEC/NYSDOH are open to proposals other than transforming the basement floor to accommodate a standard radon/SVI sub-slab depressurization system, as long as necessary health and environmental protections are achieved.

Please ensure that the validated data, inventory sheets, etc. for the November 4-6, 2013 sampling event are submitted to NYSDEC as soon as possible. If a second round of SVI sampling is going to be performed, then NYSDEC and NYSDOH will need appropriate prior notice, as was done with the initial sampling event.

The draft RI Work Plan was submitted to NYSDEC and NYSDOH on November 26, 2013 and is undergoing review. The draft RI Work Plan and the IRM Work Plan discussed above, will proceed on separate but somewhat parallel tracks, in order to expedite the SVI portion of the investigative work.

I can be reached at 518-357-2394 if there are any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'C. O'Neill', with a long horizontal flourish extending to the right.

Christopher O'Neill, P.E.
Environmental Engineer 2

ec: J. Smith, Troy Belting
R. Leistensnider, Nixon Peabody
R. Aldrich, Sterling Environmental
N. Walz, NYSDOH
D. Ripstein, NYSDOH
R. Ostrov, NYSDEC
J. Quinn, NYSDEC

New York State Department of Environmental Conservation

Office of Environmental Quality, Region 4

1130 North Westcott Road, Schenectady, New York 12306-2014

Phone: (518) 357-2045 • Fax: (518) 357-2398

Website: www.dec.ny.gov



Joe Martens
Commissioner

December 13, 2013

Troy Belting and Supply Company
Attn: Jason W. Smith
70 Cohoes Road
Watervliet, NY 12189

RE: BCP Site No. C401067
Troy Belting and Supply Company
70 Cohoes Road, Watervliet

Dear Mr. Smith:

The New York State Department of Environmental Conservation (NYSDEC) and New York State Department of Health (NYSDOH) have reviewed the documentation and third-party validated results from the soil vapor and indoor air sampling performed at a neighboring residential property. The sampling information and results were submitted on your behalf by Sterling Environmental Engineering, P.C. (Sterling) in a letter dated December 10, 2013.


In reaction to the validated data and supporting documentation, NYSDEC/NYSDOH request that Troy Belting and Supply Company (Troy Belting) develop an Interim Remedial Measures (IRM) Work Plan to mitigate the soil vapor intrusion (SVI) impacts on the sampled residential building. The IRM Work Plan should also include SVI sampling for additional neighboring buildings to the north and east of Troy Belting's parcel.

During the development of the IRM Work Plan for SVI activities, discussions may be appropriate regarding the details of removing/controlling contaminated air in the residential building basement, and subsequent first floor apartments, and the additional neighboring residences to be sampled. NYSDEC/NYSDOH recommend consultation with a radon/SVI mitigation specialist due to the relatively unique design of the residential building basement, with its dirt floor, shallow bedrock, crawl spaces, etc. NYSDEC/NYSDOH are open to proposals other than transforming the basement floor to accommodate a standard radon/SVI sub-slab depressurization system, as long as necessary health and environmental protections are achieved.

In accordance with the Brownfield Cleanup Agreement of July 12, 2013, please submit the above-requested IRM Work Plan for SVI work at neighboring properties by January 17, 2014.

I can be reached at 518-357-2394 if there are any questions.

Sincerely,



Christopher O'Neill, P.E.
Environmental Engineer 2

EC: J. Smith, Troy Belting
R. Leistensnider, Nixon Peabody
R. Aldrich, Sterling Environmental
N. Walz, NYSDOH
D. Ripstein, NYSDOH
R. Ostrov, NYSDEC
J. Quinn, NYSDEC

New York State Department of Environmental Conservation

Office of Environmental Quality, Region 4

1130 North Westcott Road, Schenectady, New York 12306-2014

Phone: (518) 357-2045 • Fax: (518) 357-2398

Website: www.dec.ny.gov



Joe Martens
Commissioner

January 30, 2014

Troy Belting and Supply Company
Attn: Jason W. Smith
70 Cohoes Road
Watervliet, NY 12189

RE: BCP Site No. C401067
Troy Belting and Supply Company
70 Cohoes Road, Watervliet

Dear Mr. Smith:

The New York State Department of Environmental Conservation (NYSDEC) and New York State Department of Health (NYSDOH) have reviewed the Interim Remedial Measures (IRM) Work Plan for the Troy Belting and Supply Company (Troy Belting) Brownfield Cleanup Program (BCP) site. The IRM Work Plan was prepared by Sterling Environmental Engineering, P.C. (Sterling Environmental) on behalf of Troy Belting and was submitted on January 17, 2014. The IRM Work Plan addresses the request from NYSDEC/NYSDOH to expedite the investigation of soil vapor intrusion (SVI) at and near the Troy Belting property.

NYSDEC and NYSDOH have several detailed comments, modifications and/or clarifications on the January 2014 IRM Work Plan.

1. Section 2.0, paragraph #2 –
 - a. For clarification, when evaluated in accordance with the NYSDOH Soil Vapor Intrusion Guidance decision matrices, the November 2013 soil vapor and indoor air sampling results indicated that soil vapor intrusion mitigation was necessary at 72 Cohoes Road.
 - b. For clarification, NYSDOH and Sterling Environmental representatives agreed to use the air sampling canister originally targeted for an outdoor ambient air sample for an indoor air sample in the second first floor apartment. Since no additional sampling canisters were available at that time, no outdoor ambient air sample could be collected.
2. Sections 2.0, 3.0 and 6.0 -
 - a. As a comment, the stated position that the December 2013 outdoor ambient air sampling results indicate potential sources of indoor air contaminant concentrations from outside the residential building worthy of extensive evaluation seems to be a remote explanation for the indoor air results for that sampling event.
 - b. As a modification, if Troy Belting desires to conduct sampling of potential contributors of contaminants to the outdoor ambient air of the area, then the additional potential source sampling needs to be performed concurrently with the proposed soil vapor intrusion sampling at all five of the nearby residential buildings and the on-site Troy Belting building.

- c. As a modification, outreach to and access for the five nearby residential buildings to be included in this next round of soil vapor intrusion sampling needs to be conducted immediately upon approval (or Approval With Modifications) of the IRM Work Plan in order for the sampling effort to be completed within the 2013-2014 heating season.
3. Section 5.0 – As a modification, the stated position that the discussion contained in Sections 6, 7, 8 and 9 of the IRM Work Plan will only be implemented if Troy Belting is the source of the VOCs found in ambient air is too definitive. If the ambient air data suggests sources other than Troy Belting, then discussions can occur to address the legal and liability provisions of the Brownfield Cleanup Agreement and Article 27 of the New York State Environmental Conservation Law. From a technical standpoint, the total sets of data from the SVI sampling program will be evaluated to determine if it is reasonably likely that Troy Belting is responsible for potential or actual impacts to on-site or off-site buildings.
4. Section 6.0, paragraph #3 – As a clarification, the locations and numbers of soil vapor intrusion samples at each residential building need to be approved by NYSDEC/NYSDOH. For example, indoor air samples for 72 Cohoes Road must include a sample for each first floor apartment.
5. Section 6.2 – As a clarification, the indoor air samples will be co-located with the sub-slab samples within the Troy Belting on-site building.
6. Section 6.3 -
 - a. As a comment, it is recommended that the soil vapor intrusion sampling utilize 6-liter sampling canisters, rather than the mini-canisters previously used.
 - b. As a comment, it is recommended that one or two additional sampling canisters be available for the sampling event, in order to avoid the loss of a planned sampling location if re-direction of a planned sampler is necessary (as occurred with the outdoor ambient air sampler in November 2013) or sampler operational problems arise on the day of the sampling event. Any unused samplers can be returned to the laboratory without needing to be analyzed.
7. Section 10.0 – As a comment, the proposed IRM schedule shows the submission of the IRM Air Sampling Report on March 20, 2014, which would mean that only one SVI sampling event could be performed within the 2013-2014 heating season for the additional off-site residences and on-site building included in the IRM Work Plan.
8. Section 6.3 and Section 10.0 – As a modification, as indicated above, the proposed schedule would limit the sampling event possibilities to one event in the 2013-2014 heating season; therefore, the unvalidated laboratory data needs to be shared with NYSDEC/NYSDOH when it becomes available so that initial evaluations can occur prior to the end of the 2013-2014 heating season, in case another sampling event is warranted.
9. Figure 2 – As a modification, Figure 2 currently includes the labeling of a MW-1D that does not exist yet. Monitoring well MW-1D is proposed as part of the draft Remedial Investigation Work Plan.

In an effort to expedite the proposed soil vapor intrusion work so it can be completed within the 2013-2014 heating season, NYSDEC/NYSDOH can “Approve With Modifications” the January 2014 IRM Work Plan if the above comments/modifications/clarifications are accepted by Troy Belting. This letter and Troy Belting’s acceptance letter would become Addendum #1 to the January 2014 IRM Work

Plan, and become part of that work plan. Otherwise, the comments/modifications/clarifications provided above will need to be resolved before a Draft Revised IRM Work Plan can be submitted for NYSDEC/NYSDOH review.

So that this work may be implemented as soon as feasibly possible within the 2013-2014 heating season, please provide a response to me upon your consideration of the above, but in no case later than February 14, 2014, regarding Troy Belting's acceptance of the above comments/modifications/clarifications or Troy Belting's desire for further discussion and revisions of the January 2014 IRM Work Plan.

I can be reached at 518-357-2394 if there are any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "C. O'Neill", with a long horizontal flourish extending to the right.

Christopher O'Neill, P.E.
Environmental Engineer 2

EC: J. Smith, Troy Belting
R. Leistensnider, Nixon Peabody
R. Aldrich, Sterling Environmental
N. Walz, NYSDOH
D. Ripstein, NYSDOH
R. Ostrov, NYSDEC
J. Quinn, NYSDEC

New York State Department of Environmental Conservation

Office of Environmental Quality, Region 4

1130 North Westcott Road, Schenectady, New York 12306-2014

Phone: (518) 357-2045 • Fax: (518) 357-2398

Website: www.dec.ny.gov



Joe Martens
Commissioner

April 17, 2014

Troy Belting and Supply Company
Attn: Jason W. Smith
70 Cohoes Road
Watervliet, NY 12189

RE: BCP Site No. C401067
Troy Belting and Supply Company
70 Cohoes Road, Watervliet

Dear Mr. Smith:

The New York State Department of Environmental Conservation (NYSDEC) and New York State Department of Health (NYSDOH) have reviewed the Redline/Strikeout Version of the Interim Remedial Measures (IRM) Work Plan for Test Pitting and Soil Vapor Investigation (SVI) of Commercial Building (Redline-Version Onsite SVI and Test Pitting Work Plan) for the Troy Belting and Supply Company (Troy Belting) Brownfield Cleanup Program (BCP) site. The Redline-Version Onsite SVI and Test Pitting Work Plan was prepared by Sterling Environmental Engineering, P.C. (Sterling Environmental) on behalf of Troy Belting and was submitted on April 9, 2014. The Redline-Version Onsite SVI and Test Pitting Work Plan addresses the comments from NYSDEC/NYSDOH on the previously-submitted March 21, 2014 version of the investigative work plan.

NYSDEC and NYSDOH have determined that the Redline-Version Onsite SVI and Test Pitting Work Plan has satisfactorily addressed our comments; therefore it is approved. Please assemble the April 9, 2014 redline/strikeout version into its final format, and resubmit it as the official, approved version of the work plan. If the final version of the Interim Remedial Measures (IRM) Work Plan for Test Pitting and Soil Vapor Investigation (SVI) of Commercial Building is received by April 22, 2014, then the work plan can commence on April 23, 2014, as previously discussed with Sterling Environmental.

I can be reached at 518-357-2394 if there are any questions.

Sincerely,

Christopher O'Neill, P.E.
Environmental Engineer 2

EC: J. Smith, Troy Belting
R. Leistensnider, Nixon Peabody
R. Aldrich, Sterling Environmental
R. Ostrov, NYSDEC
N. Walz, NYSDOH
D. Ripstein, NYSDOH
J. Quinn, NYSDEC

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Website: www.dec.ny.gov



Joe Martens
Commissioner

May 21, 2014

Troy Belting and Supply Company
Attn: Jason W. Smith
70 Cohoes Road
Watervliet, NY 12189

RE: Remedial Investigation Work Plan
BCP Site No. C401067
Troy Belting and Supply Company
70 Cohoes Road, Watervliet

Dear Mr. Smith:

The New York State Department of Environmental Conservation (NYSDEC) and New York State Department of Health (NYSDOH) have reviewed the Remedial Investigation Work Plan (RIWP) for the Troy Belting and Supply Company (Troy Belting) Brownfield Cleanup Program (BCP) site. The RIWP was prepared by Sterling Environmental Engineering, P.C. (Sterling Environmental) on behalf of Troy Belting and was submitted on February 25, 2014.

NYSDEC and NYSDOH approved the 2/25/2014 version of the RIWP for the required public comment period, recognizing that some minor revisions would be necessary, and more major revisions could be needed depending on the public input received. There were no comments received from the general public, only inquiries on the status and background of the overall project.

I discussed the following comments with Mark Williams of Sterling Environmental on May 7, 2014. The following items reflect comments from NYSDEC, NYSDOH, and the NYSDEC Division of Fish, Wildlife and Marine Resources (DFWMR).

1. Sections 2.3, MW-5 - Please revise the last sentence regarding the DUP-1 results to read, "...except for DUP-1 results also exceeded for..."
2. Section 3.3 – Please insert a new paragraph at the beginning of this section to state that some test pitting work has been performed as part of the approved IRM on-site investigation work plan, expediting the source area investigation as it relates to soil vapor intrusion for the on-site building.
3. Section 3.5 –
 - a. The paragraph that starts with "At each shallow monitoring well..." needs to be revised at the end to reflect there are shallow wells proposed as MW-6, MW-7, MW-8, and MW-9. In addition, MW-7 should be finished with a protective standpipe or secured flush-mount cover depending on its location and surroundings, while MW-6, MW-8 and MW-9 wells should be finished with secured flush-mount covers.

- b. The paragraph that starts with "At each deeper bedrock monitoring well..." needs to be revised by changing "MW-4" to "MW-1" in the first sentence, and removal of the second sentence.
4. Section 3.5.1 –
 - a. Please clarify the list of parameters in the groundwater sampling table, such that "Full TCL/TAL" is identified as including VOCs, SVOCs, Metals, PCBs, and Pesticides. Adding a footnote to the table may suffice.
 - b. A similar table with specific notations may be helpful to summarize the soil samples and analytical parameters to be undertaken as written in sections 3.2, 3.3 and 3.4.1.
 5. Section 3.6 – The listed analyses for the collected surface water and sediment samples needs to also include PCBs (polychlorinated biphenyls).
 6. Section 3.7 – Please insert a new paragraph at the end of this section stating that an IRM investigation work plan for on-site soil vapor intrusion work has been implemented to expedite potential mitigation decisions for the on-site building.
 7. Section 3.7.2 – Please revise the last paragraph to make it more general, such as "One (1) indoor air sample will be obtained in the first floor living space(s)."
 8. Section 3.7.6 –
 - a. Please revise the last sentence to read, "...will be abandoned in place by cutting and plugging the tubing..."
 - b. Please insert a new paragraph that acknowledges the potential for additional soil vapor sampling needs. For example, it may become necessary to install soil vapor points near 72 Cohoes Road and along Cohoes Road utility trenches.
 9. Figures 2 and 10 – Please add labels onto the buildings for #73 and #76 Cohoes Road.
 10. Figure 3 –
 - a. Please confirm that groundwater elevations are correctly illustrated in this figure as being above the screened section of the existing wells. If that is the case, then statements describing that data as indicative of an upward gradient for groundwater in those wells should be added to section 2.2.
 - b. Please revise the labeling in the "Typical Well Detail" to be consistent with the cross-sections, including: change MW-3 to a well used for the cross-sections; change Top of Shale to Top of Bedrock (shale); and change Bottom of Well to Total Depth (bottom of well).
 11. Figure 10 –
 - a. Please add a sediment/surface water sampling location in the on-site intermittent stream, opposite the northwest corner of the on-site building, reflecting the potential for subsurface contaminant migration along the building foundation toward the stream.
 - b. Please remove the soil vapor point locations along the northern property boundary of 70 Cohoes Road, with the understanding that one or more other soil vapor points may be necessary (as stated in Item #8b above).

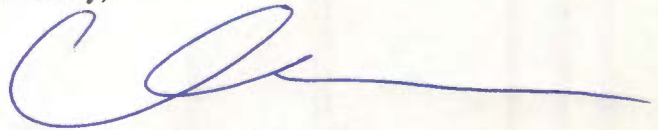
12. Table 1 – Please revise the regulatory reference value columns and footnotes to reflect NYSDEC TOGS 1.1.1 standards or guidance values for Class GA groundwater, as ambient water quality values not water discharge limits.
13. Appendix C – Please revise the wording on the Product Inventory Form to more general, such that the heading reads, “List specific products found in the building that have the potential to affect indoor air quality.”

As a general clarification regarding applicable 6NYCRR Part 375 Soil Cleanup Objectives, the remedial Alternatives Analysis, that will follow the remedial investigation, will present an evaluation of cleanup alternatives for approval by NYSDEC/NYSDOH. The evaluated cleanup alternatives typically include combinations of soil cleanup objectives, remedial technologies and potential institutional controls which could be used to achieve the required protection of public health and the environment. The text of the RIWP is acceptable; however, it is too early to focus on comparisons to Commercial Use soil cleanup objectives, and not consider Unrestricted Use or Groundwater Protection soil cleanup objectives in the overall context of the project. The pending Remedial Investigation Report must, at a minimum, compare all soil data to the 6NYCRR Part 375 Unrestricted guidance values, and the pending Alternatives Analysis Report must evaluate at least one Alternative which will achieve unrestricted re-use for the site.

Please submit a revised Remedial Investigation Work Plan (RIWP) to me by June 27, 2014, reflecting the above-identified comments. If there are discussions needed regarding these comments, please let me know as soon as possible, in order to resolve and finalize the RIWP. If these comments are acceptable to Troy Belting, then submitting a redline/strikeout version and incorporated version may expedite the approval and implementation authorization for the RIWP.

I can be reached at 518-357-2394 if there are any questions.

Sincerely,



Christopher O'Neill, P.E.
Environmental Engineer 2

EC: J. Smith, Troy Belting
R. Leistensnider, Nixon Peabody
R. Aldrich, Sterling Environmental
M. Williams, Sterling Environmental
N. Walz, NYSDOH
D. Ripstein, NYSDOH
R. Ostrov, NYSDEC
J. Quinn, NYSDEC

CO:jh\May2014-RIWorkPlanCommentLetter

New York State Department of Environmental Conservation

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Website: www.dec.ny.gov



Joe Martens
Commissioner

July 25, 2014

Troy Belting and Supply Company
Attn: Jason W. Smith
70 Cohoes Road
Watervliet, NY 12189

**RE: BCP Site No. C401067
Sub-Slab Depressurization System Design Report**

Dear Mr. Smith:

The New York State Department of Environmental Conservation (NYSDEC) and New York State Department of Health (NYSDOH) have reviewed the "Sub-Slab Depressurization System (SSDS) Design Report {SSDS Report}" regarding the on-site building of the Troy Belting and Supply Company (Troy Belting) Brownfield Cleanup Program (BCP) site. The SSDS Report was prepared by Sterling Environmental Engineering, P.C. (Sterling Environmental) on behalf of Troy Belting and was submitted on July 10, 2014.

NYSDEC and NYSDOH have established performance criteria for an SSDS design and operation that focus on the demonstration of effective control/collection of sub-slab volatile organic chemicals (VOC), thereby providing sufficient protection of public health within the building. The SSDS Report correctly refers to the minimum vacuum measurements (vacuum of 0.02 inches of Water) that indicate satisfactory depressurization of a building's sub-slab space.

NYSDEC and NYSDOH have the following comments/clarifications on the vapor extraction pilot study and subsequent SSDS design described in the SSDS Report.

1. Given the considerable amount of discussions regarding extraneous/fugitive VOC concentrations in the ambient outdoor air of the neighborhood, the Pilot Test discharge of extracted sub-slab vapors needs to be treated with vapor-phase granular activated carbon or other suitable technology prior to discharge to the outdoor air. Please note that VOC nuisance odors need to be controlled by the vapor treatment as well as the actual VOC concentrations.
2. The SSDS will need to effectively control/collect sub-slab vapors with overlapping radii of influence for system extraction points. Section 4.0 of the SSDS Report states "...the zones of depressurization will meet or overlap...", which is unacceptable.
3. The reference to "...The horizontal alignment..." of the extraction point PVC pipe is unclear as it relates to the previous sentence of item 3 on page 3 of the SSDS report. One sentence discusses vertical placement of the PVC piping and another sentence seems to discuss horizontal placement. A clarification email was received on 7/22/2014 from Sterling which satisfies this comment. The clarification language needs to be inserted into the SSDS Report.

4. Projected dates for transmitting to NYSDEC and NYSDOH the results of the SSDS Pilot Test, the SSDS final design and the SSDS performance documentation need to be established.
5. The operation, monitoring and maintenance program for the SSDS will need to include system emissions sampling to ensure satisfactory compliance with applicable ambient air quality regulations.
6. The SSDS Report discusses the presence of an additional frost wall, potentially segregating the western-most part of the on-site building. This and other possible sub-grade foundation characteristics or potential additional source areas, may result in the need for additional sub-slab sampling and vacuum communication monitoring points within the total building footprint in order to demonstrate satisfactory SSDS performance.

Please provide a revised SSDS Report for the proposed Pilot Test and SSDS design, reflecting the comments provided above. Please submit the revised SSDS Report as soon as possible, but no later than August 21, 2014.

I can be reached at 518-357-2394 if there are any questions.

Sincerely,



Christopher O'Neill, P.E.
Environmental Engineer 2

CO:lgJuly 2014_SSDS Design Work Plan Comment Letter

EC: J. Smith, Troy Belting
R. Leistensnider, Nixon Peabody
R. Aldrich, Sterling Environmental
N. Freeman, NYSDOH
D. Ripstein, NYSDOH
R. Ostrov, NYSDEC
J. Quinn, NYSDEC

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Website: www.dec.ny.gov



Joe Martens
Commissioner

July 25, 2014

Troy Belting and Supply Company
Attn: Jason W. Smith
70 Cohoes Road
Watervliet, NY 12189

**RE: BCP Site No. C401067
Remedial Investigation Work Plan**

Dear Mr. Smith:

The New York State Department of Environmental Conservation (NYSDEC) and New York State Department of Health (NYSDOH) have reviewed the "Remedial Investigation (RI) Work Plan {RIWP}" for the Troy Belting and Supply Company (Troy Belting) Brownfield Cleanup Program (BCP) site. The RIWP was prepared by Sterling Environmental Engineering, P.C. (Sterling Environmental) on behalf of Troy Belting and was submitted on June 30, 2014.

NYSDEC and NYSDOH have the following minor comments on the 6-30-2014 version of the RIWP, such that if the following comments are acceptable to you, then the 6-30-2014 version can be Approved With Modifications, represented by the following comments.

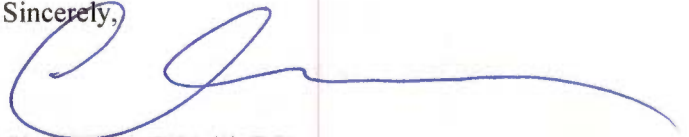
1. Section 3.3 – Following the sentence "Additional test pits may be installed to further determine the extent of the source area", adding "If additional test pitting is performed, it will be done consistent with the April 23, 2014 procedures described below."
2. Section 3.3 – Following the sentence "The number of composite and grab samples of the impacted soil stockpile will be in accordance with the NYSDEC DER-10 Table 5.4(e)10.", revising "Re-use of the soil and/or disposal at a permitted facility will be completed in accordance with 6 NYCRR Part 371 (Identification and Listing of Hazardous Waste), 6 NYCRR Part 376 (Land Disposal Restrictions) and NYSDEC DER-10 Table 5.4(e)4."
3. Table in Section 3.5.1 – Add the footnote marker "***" to the MW-1 entry of the table for "Full TCL/TAL" parameters to be analyzed.
4. Section 3.7.2 – Revising the second sentence of the second bulleted item for non-concrete basement/crawl space floor, "The surface of the soil will be covered with plastic sheeting extending at least five (5) feet in each direction from the soil vapor sampling point, to minimize the possibility of air within the basement following a short circuit into the sample."
5. Section 3.7.6 – Following the sentence "The air sample will be analyzed by an ELAP-certified laboratory for VOCs.", revising "The sampling probe will be abandoned in place by cutting and plugging the tubing and covering the surface with native soil."

6. Table 1 – Revising the “Reg 1” column entries for cobalt and vanadium to reflect that no Class GA groundwater standard or guidance value is established for either of these two chemicals.

Please provide a response to me as soon as possible, but no later than August 31, 2014, as to your acceptance of the above-detailed comments/modifications. If the comments/modifications are acceptable to you, then consider the 6-30-2014 version of the RIWP Approved With Modifications, and include this letter and your affirmative response to this letter with the 6-30-2014 version of the RIWP as the “approved work plan”. If the above-detailed comments/modifications are not acceptable to you, then please contact me no later than August 25, 2014, so that additional discussions can be scheduled to finalize the RIWP for this project.

I can be reached at 518-357-2394 if there are any questions.

Sincerely,



Christopher O'Neill, P.E.
Environmental Engineer 2

CO:lgJuly 2014-ReDrafter RI WorkPlan Comment Letter

EC: J. Smith, Troy Belting
R. Leistensnider, Nixon Peabody
R. Aldrich, Sterling Environmental
N. Freeman, NYSDOH
D. Ripstein, NYSDOH
R. Ostrov, NYSDEC
J. Quinn, NYSDEC

New York State Department of Environmental Conservation

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Joe Martens
Commissioner

August 15, 2014

Troy Belting and Supply Company
Attn: Jason W. Smith
70 Cohoes Road
Watervliet, NY 12189

**RE: BCP Site No. C401067
Troy Belting and Supply Company
Approval – Offsite Sub-Slab Vapor, Indoor
Air and Outdoor Air Sampling Investigation
Report**

Dear Mr. Smith:

The New York State Department of Environmental Conservation (NYSDEC) and New York State Department of Health (NYSDOH) have reviewed the August 7, 2014 revised text for the Offsite Sub-Slab Vapor, Indoor Air and Outdoor Air Sampling Investigation Report (Offsite SVI Report) for the Troy Belting and Supply Company (Troy Belting) Brownfield Cleanup Program (BCP) site. The revised Offsite SVI Report was prepared by Sterling Environmental Engineering, P.C. (Sterling Environmental) on behalf of Troy Belting.

NYSDEC and NYSDOH hereby approve the August 7, 2014 revised Offsite SVI Report, as it has satisfactorily addressed our comments on the previous versions. Please provide the final version of the Offsite SVI Report full document to the William K. Sanford Town Library for the site's document repository, as well as NYSDOH and this office.

I can be reached at 518-357-2394 if there are any questions.

Sincerely,

Christopher O'Neill, P.E.
Environmental Engineer 2

CO:lg\Aug2014 Approval of Offsite SVI Report

ec: J. Smith, Troy Belting
R. Leistensnider, Nixon Peabody
R. Aldrich, Sterling Environmental
M. Williams, Sterling Environmental
N. Freeman, NYSDOH
D. Ripstein, NYSDOH
R. Ostrov, NYSDEC
J. Quinn, NYSDEC

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Region 4 Main Office
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www.dec.ny.gov

April 16, 2015

Troy Belting and Supply Company
Attn: Jason W. Smith
70 Cohoes Road
Watervliet, NY 12189

RE: BCP Site No. C401067
Troy Belting and Supply Company
Comments – SSDS Report and Workplan

Dear Mr. Smith:

The New York State Department of Environmental Conservation (NYSDEC) and New York State Department of Health (NYSDOH) have reviewed the February 27, 2015 "Sub-Slab Depressurization System (SSDS) Pilot Test Results and Design Report" (SSDS Report) for the Troy Belting and Supply Company (Troy Belting) Brownfield Cleanup Program (BCP) site. The SSDS Report was prepared by Sterling Environmental Engineering, P.C. (Sterling Environmental) on behalf of Troy Belting.

NYSDEC and NYSDOH have assembled the following detailed comments on the SSDS Report. On April 9, 2015, representatives of Troy Belting, Sterling Environmental, NYSDOH and NYSDEC met to discuss the status of the soil vapor intrusion issues for the on-site building. Based on that meeting, the scope of the SSDS Report and associated workplan may be revised, rendering some of the following comments invalid.

1. Section 1.0 - Please include the date(s) of the SSDS "Pilot Test" in this section.
2. Section 2.1 – Please confirm and clarify the apparent discrepancy as to when the sub-slab pressure testing was conducted. The first paragraph indicates December 10 and 11, 2014, while the second paragraph indicates that the testing started on December 9, 2014.
3. Section 4.0 – The referenced sampling port 70-SV-7 is described as located in the "addition" portion of the on-site building. The recommended soil vapor sample (sub-slab vapor sample) at 70-SV-7 is not included in the Section 10.0 Schedule table. Also, sub-slab sampling at 70-SV-7 and other portions of the as yet non-sampled building footprint are necessary to establish current sub-slab vapor conditions throughout the on-site building footprint. This effort should be added to the work schedule in Section 10.0.
4. Section 5.0 – The last sentence of the third paragraph does not make sense as written.
5. Section 6.0 (and Section 4.0) – The proposed two extraction point locations may provide negative pressure beneath the building floor slab, but the 'radius of influence' data from the Pilot Test suggests that the two proposed extraction points likely will not be able to control sub-slab vapors throughout the building footprint, as discussed in comment #3 above.

6. Section 10.0 – The work schedule table needs several revisions.
 - A. The timeframe for task #3 seems to be over-estimated. In any case, all of the tasks should be performed as expediently as possible to establish the post-SSDS vapor and air quality goals as soon as possible.
 - B. The monitoring schedule described under task 5 does not seem to reflect the breakthrough estimates described in Section 8.0.
 - C. Post-SSDS start-up and operation data will be needed to demonstrate satisfactory vacuum/pressure field conditions beneath the on-site building footprint.
 - D. Post-SSDS start-up and operation monitoring will be needed to provide indoor air/sub-slab data on a periodic basis, as a way to demonstrate satisfactory human health protection for the on-site building occupants and effective contaminant removal/treatment from the sub-slab source area.
7. Section 11.0 – The Operation, Maintenance and Monitoring Plan (OMM Plan) is mentioned but is not specified as to when it will be developed and submitted to NYSDEC/NYSDOH for review. At some point, the OMM Plan would become part of an Interim Site Management Plan and Construction Completion Report for the SSDS which will also be acting as a soil vapor extraction system for the source area.
8. Table 3 – Please add clarification statements/labels to the table headings to identify sample results as duplicate samples (where appropriate) and specific locations.
9. Table 4 – The supplemental vapor sampling points 70-SV-8 and 70-SV-9 discussed in Section 3.3 are identified in Table 4 as 70-SV-2 and 70-SV-7. Please clarify this discrepancy in sampling locations/labeling.
10. Figure 1 – Please add clarification statements to the figure legend to identify that the soil vapor access points were installed in several phases, and which sampling points were installed during which phase of the soil vapor intrusion study activities.
11. Figures 3 and 4 –
 - A. The relevance of graphing tetrachloroethene and trichloroethene concentrations dating back to the May 2014 sampling event with the December 2014 Pilot Study sampling events is unclear. It is suggested that a more appropriate data comparison would reflect the chemical concentrations with their “extraction” rates for their sampling events would be more informative and relevant. The May 2014 extraction rate would equate to the utilized sampling canister collection rate, while the December 2014 extraction rates would equate to the Pilot Study SSDS fan extraction rate from the sub-slab zone.
 - B. The “Note” on each of the figures includes a typo...”ans” instead of “and”.

12. Figure 5 – Please make the following revisions:
 - A. Label the 0, 10, and 100 marks on the log scale x-axis.
 - B. Identify the data points by location and numerical values.
13. Plate 1 – Please confirm the following items and revise the plans as appropriate.
 - A. The “Collection Area Section” identifies existing sub-slab material as fine sand rather than medium sand as described in the report text sections.
 - B. The “Sub-Slab Depressurization System Plan” and the SSDS “Section B-B” identify two patio blocks as support for the exterior discharge fan. A more stable platform or foundation for the exterior fan location at grade is recommended.
 - C. The “Sub-Slab Depressurization System” “Section B-B” does not show where the heater unit would be situated as part of the SSDS system.

Please provide a revised SSDS Report to this office by May 29, 2015, satisfactorily addressing the above comments, and/or identifying how the comments will be addressed at a later date under another workplan.

Please contact me at 518-357-2394 if there are any questions.

Sincerely,



Christopher O'Neill, P.E.
Environmental Engineer 2

ec: J. Smith, Troy Belting
R. Leistensnider, Nixon Peabody
R. Aldrich, Sterling Environmental
M. Williams, Sterling Environmental
S. Karpinski, NYSDOH
J. Deming, NYSDOH
R. Ostrov, NYSDEC
J. Quinn, NYSDEC

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Office of Environmental Quality, Region 4

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June 16, 2015

Troy Belting and Supply Company
Attn: Jason W. Smith
70 Cohoes Road
Watervliet, NY 12189

RE: BCP Site No. C401067
Troy Belting and Supply Company
Approval – Vapor Mitigation System Pilot
Test Results and Design Report

Dear Mr. Smith:

The New York State Department of Environmental Conservation (NYSDEC) and New York State Department of Health (NYSDOH) have reviewed the June 1, 2015 revised Vapor Mitigation System Pilot Test Results and Design Report (Vapor Mitigation System Report) for the Troy Belting and Supply Company (Troy Belting) Brownfield Cleanup Program (BCP) site. The revised Vapor Mitigation System Report was prepared by Sterling Environmental Engineering, P.C. (Sterling Environmental) on behalf of Troy Belting.

NYSDEC and NYSDOH hereby approve the June 1, 2015 revised Vapor Mitigation System Report, as it has satisfactorily addressed our comments on the previous versions. Please proceed as described in the June 1, 2015 revised Vapor Mitigation System Report with the installation and operation of the proposed vapor extraction system.

I can be reached at 518-357-2394 if there are any questions.

Sincerely,



Christopher O'Neill, P.E.
Environmental Engineer 2

EC: J. Smith, Troy Belting
R. Leistensnider, Nixon Peabody
R. Aldrich, Sterling Environmental
M. Williams, Sterling Environmental
S. Karpinski, NYSDOH
J. Deming, NYSDOH
R. Ostrov, NYSDEC
J. Quinn, NYSDEC



Department of
Environmental
Conservation

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Office of Environmental Quality, Region 4

1130 North Westcott Road, Schenectady, NY 12306-2014

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February 25, 2016

Troy Belting and Supply Company
Attn: Jason W. Smith
70 Cohoes Road
Watervliet, NY 12189

RE: BCP Site No. C401067
Troy Belting and Supply Company
70 Cohoes Road, Watervliet

Dear Mr. Smith:

The New York State Department of Environmental Conservation (NYSDEC) and New York State Department of Health (NYSDOH) have reviewed the Vapor Mitigation System (VMS) Construction Completion Report (CCR) and Operation, Monitoring & Maintenance Plan (OMM Plan) submitted on December 18, 2015. These VMS documents were provided to us by Sterling Environmental Engineering, P.C. (Sterling Environmental) on behalf of Troy Belting and Supply Company (Troy Belting).

The NYSDEC/NYSDOH have composed detailed comments on the VMS documents in the enclosed/attached document excerpts, for inclusion in a revised CCR and OMM Plan.

General comments on the CCR:

1. In general, the CCR provides the construction and initial VMS effectiveness information, but the use of the sub-slab sampling results during VMS operation should not be compared directly to the NYSDOH Soil Vapor Intrusion guidance document matrices nor the previous sub-slab data for vapor exposure evaluations.
2. As discussed in the meeting between Sterling Environmental, Troy Belting, NYSDOH and NYSDEC representatives on January 13, 2016, additional sub-slab vapor and indoor air sampling for soil vapor intrusion evaluation should be conducted with the VMS having been shutdown for several (six or more) weeks.

General comment on the OMM Plan:

1. In general, the OMM Plan is lacking a proposed schedule for various VMS parameters, with some as frequent as weekly, some annually, and some in between and/or phased in.

Please incorporate the comments being provided herein, and re-submit the VMS CCR and OMM documents by April 15, 2016, for NYSDEC/NYSDOH review.

Given the timing of these comments and the additional soil vapor sampling event discussed in our January 2016 meeting, the VMS can be shutdown upon receipt of this letter, to facilitate useable sampling results for 'static' vapor conditions, i.e., vapor conditions without the influence of an operating vapor extraction/mitigation system, for a late March 2016 sampling event. Please provide notice to this office as to the schedule/plans for this heating season sampling event, or if the event will be cancelled for this heating season.

I can be reached at 518-357-2394 if there are any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'C. O'Neill', with a long horizontal flourish extending to the right.

Christopher O'Neill, P.E.
Environmental Engineer 2

Enclosure

ec: J. Smith, Troy Belting
R. Leistensnider, Nixon Peabody
R. Aldrich, Sterling Environmental
M. Williams, Sterling Environmental
S. Karpinski, NYSDOH
J. Deming, NYSDOH
R. Ostrov, NYSDEC
J. Quinn, NYSDEC



April 8, 2016

Mr. Christopher O'Neill, P.E.
NYSDEC Region 4
Office of Environmental Quality
1130 North Westcott Road
Schenectady, New York 12306-2014

Via Email (christopher.oneill@dec.ny.gov)

Subject: Response to NYSDEC/NYSDOH Comments
on the Vapor Mitigation System (VMS) Construction Completion Report (CCR) and
Operations, Monitoring and Maintenance (OM&M) Plan
BCP Site No. C401067
Troy Belting & Supply Company, Colonie, New York
STERLING File #2011-31 (Task 910)

Dear Mr. O'Neill,

This letter is in response to the New York State Department of Environmental Conservation (NYSDEC) and New York State Department of Health (NYSDOH) comments received by letter dated February 25, 2016 on the "Vapor Mitigation System Construction Completion Report" and "Operations, Monitoring and Maintenance (OM&M) Plan of the VMS" dated December 18, 2015 for the Troy Belting and Supply Company (Troy Belting) Brownfield Cleanup Program (BCP) site.

The response to each comment is numbered consistently with the order in which they appear in the NYSDEC's February 25, 2016 letter. Enclosed are the final revised reports including redlines of the revisions made.

General Comments on the CCR:

Comment 1: In general, the CCR provides the construction and initial VMS effectiveness information, but the use of the sub-slab sampling results during VMS operation should not be compared directly to the NYSDOH Soil Vapor Intrusion guidance document matrices nor the previous sub-slab data for vapor exposure evaluations.

Response 1: The text and Table 9 of the CCR, which used the indoor air and sub-slab vapor results within the matrices in the NYSDEC Soil Vapor Intrusion guidance document, were removed. A comparison is provided for the pre- and post-startup results at each sampling location. This comparison provides useful information regarding the indoor air and the sub-slab VMS.

Comment 2: As discussed in the meeting between STERLING, Troy Belting, NYSDOH and NYSDEC representatives on January 13, 2016, additional sub-slab vapor and indoor air sampling for soil vapor intrusion evaluation should be conducted with the VMS having been shutdown for several (six or more) weeks.

Response 2: Troy Belting shutdown the VMS on Friday, February 26, 2016. Additional indoor air and soil vapor sampling was performed March 28, 2016 to March 29, 2016 during the 2015-

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2016 heating season, four weeks after the shutdown of the VMS. Although the VMS had not been shutdown for a full six (6) weeks, delay of the monitoring after April 2016 would be after the climatically predicted heating season. The NYSDEC approved the sampling date before the samples were collected.

General Comment on the OMM Plan:

Comment 1: In general, the OMM Plan is lacking a proposed schedule for various VMS parameters, with some as frequent as weekly, some annually, and some in between and/or phased in.

Response 1: Section 8.0 includes a description of the monitoring program for the VMS, including inspection frequencies for the various activities. Based on verbal guidance from the NYSDEC, the monitoring program is presented graphically in the Reporting Schedule provided in Appendix D. Modification to the sampling frequencies beyond daily and weekly, if warranted and approved by the Departments, can be made by modifying the Reporting Schedule without requiring modification to Section 8.0 of the OMM Plan.

Please contact me should you have any questions.

Very truly yours,

STERLING ENVIRONMENTAL ENGINEERING, P.C.



Rodney L. Aldrich, P.E.

Director of Environmental Services

rodney.aldrich@sterlingenvironmental.com

RLA/bc

Email/First Class Mail

Enclosures (Final Report & CD, Redlines)

cc: Jason Smith, Troy Belting & Supply Company
David Barcomb, Troy Belting & Supply Company (Email Only)
Ruth Leistensnider, Nixon Peabody, LLP
James Quinn, NYSDEC (Email Only)
Steven Karpinski, NYSDOH (Letter & CD)
Justin Deming, NYSDOH (Letter & CD)
Richard Ostrov, Esq., NYSDEC (Email Only)

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Office of Environmental Quality, Region 4
1130 North Westcott Road, Schenectady, NY 12306-2014
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www.dec.ny.gov

November 28, 2016

Troy Belting and Supply Company
Attn: Jason W. Smith
70 Cohoes Road
Watervliet, NY 12189

RE: BCP Site No. C401067
Troy Belting and Supply Company

Dear Mr. Smith:

The New York State Department of Environmental Conservation (NYSDEC) and New York State Department of Health (NYSDOH) have reviewed the July 2016 revised Vapor Mitigation System Construction Completion Report (July 2016 VMS-CCR) for the Troy Belting and Supply Company (Troy Belting) Brownfield Cleanup Program (BCP) site. The July 2016 VMS-CCR was prepared by Sterling Environmental Engineering, P.C. (Sterling Environmental) on behalf of Troy Belting.

NYSDEC and NYSDOH provide the following comments which highlight the attached detailed comments handwritten on the excerpted report pages.

1. The NYSDOH Air Guideline concentration for trichloroethene (TCE) was changed in 2015 from 5 ug/m³ to 2 ug/m³. This change in value needs to be incorporated in the text of Section 4.2.3.1, Tables 4a, 5A, 6A, and 7A, as well as any other applicable report location.
2. The calculated data entries for Tables 10 A and 10 B need to be changed to reflect the corrected calculations for the Air Guide 1 evaluations, which have been the subject of several phone conversations between NYSDEC and Sterling Environmental staff.

Please submit a revised (Final) version of the VMS Construction Completion Report specific changes only (text and tables that are changed), satisfying the provided comments, by December 31, 2016, to the NYSDEC and NYSDOH. Upon acceptance of the submitted changes, then a final, approve-able CCR can be assembled and submitted.

I can be reached at 518-357-2394 if there are any questions.

Sincerely,



Christopher O'Neill, P.E.
Environmental Engineer 2

cc with attachment:
J. Smith, Troy Belting
R. Leistensnider, Nixon Peabody
R. Aldrich, Sterling Environmental
T. Johnson, Sterling Environmental
S. Karpinski, NYSDOH
J. Deming, NYSDOH
R. Ostrov, NYSDEC
R. Mustico, NYSDEC

Letter: BCP.C401067.2016-11-28.comment letter for the July 2016 version of the VMS CCR



Department of
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November 29, 2016

Troy Belting and Supply Company
Attn: Jason W. Smith
70 Cohoes Road
Watervliet, NY 12189

**RE: BCP Site No. C401067
Troy Belting and Supply Company**

Dear Mr. Smith:

The New York State Department of Environmental Conservation (NYSDEC) and New York State Department of Health (NYSDOH) have reviewed the August 2016 revised Vapor Mitigation System Operations, Monitoring and Maintenance Plan (Aug 2016 VMS-OMM) for the Troy Belting and Supply Company (Troy Belting) Brownfield Cleanup Program (BCP) site. The Aug 2016 VMS-OMM was prepared by Sterling Environmental Engineering, P.C. (Sterling Environmental) on behalf of Troy Belting.

NYSDEC and NYSDOH provide the following comments which highlight the enclosed detailed comments hand-written on the excerpted report pages.

1. Page 7 of the Aug 2016 VMS-OMM document: The NYSDEC hazardous waste management staff have advised that the "D" waste codes should be replaced by a more appropriate waste code.
2. Page 13 of the Aug 2016 VMS-OMM document: The use of the word "daily" should be specified to mean each facility work day, such that the term will not be confused to mean that inspections will be performed on weekends and holidays.
3. Appendix F of the Aug 2016 VMS-OMM document: This section presenting the details of the calculated air emissions was revised based on a phone conversation between NYSDEC and Sterling Environmental on 9-20-2016. The revised version dated 10-4-2016 lead to a follow-up phone conversation on 10-5-2016, with identified additional revisions to be considered.

Please submit a revised (Final) version of the VMS Operations, Monitoring and Maintenance Plan specific changes only (text and tables that are changed), satisfying the provided comments, by **December 31, 2016**, to the NYSDEC and NYSDOH. Upon acceptance of the submitted changes, then a final, approve-able OMM document can be assembled and submitted.



Department of
Environmental
Conservation

I can be reached at 518-357-2394 if there are any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "C. O'Neill", with a long horizontal flourish extending to the right.

Christopher O'Neill, P.E.
Environmental Engineer 2

Enclosure

ec w/enc:

J. Smith, Troy Belting
R. Leistensnider, Nixon Peabody
R. Aldrich, Sterling Environmental
T. Johnson, Sterling Environmental
S. Karpinski, NYSDOH
J. Deming, NYSDOH
R. Ostrov, NYSDEC
R. Mustico, NYSDEC

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January 20, 2017

Troy Belting and Supply Company
Attn: Jason W. Smith
70 Cohoes Road
Watervliet, NY 12189

**RE: BCP Site No. C401067
Troy Belting and Supply Company**

Dear Mr. Smith:

The New York State Department of Environmental Conservation (NYSDEC) and New York State Department of Health (NYSDOH) have reviewed the January 4, 2017 revised versions of the Vapor Mitigation System Construction Completion Report (Jan 2017 CCR) and Operations, Monitoring and Maintenance (OM&M) Plan of the Vapor Mitigation System (Jan 2017 OMM) for the Troy Belting and Supply Company (Troy Belting) Brownfield Cleanup Program (BCP) site. These project documents were prepared by Sterling Environmental Engineering, P.C. (Sterling Environmental) on behalf of Troy Belting.

NYSDEC and NYSDOH hereby approve the Jan 2017 CCR which details the installation of the on-site vapor mitigation system, and the Jan 2017 OMM which establishes the operating/monitoring/maintenance program for the on-site vapor mitigation system.

I can be reached at (518) 357-2394 if there are any questions.

Sincerely,



Christopher O'Neill, P.E.
Environmental Engineer 2

EC: J. Smith, Troy Belting
R. Leistensnider, Nixon Peabody
R. Aldrich, Sterling Environmental
T. Johnson, Sterling Environmental
S. Karpinski, NYSDOH
J. Deming, NYSDOH
R. Ostrov, NYSDEC
R. Mustico, NYSDEC



Department of
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STERLING

Sterling Environmental Engineering, P.C.

February 17, 2017

Mr. Christopher O'Neill, P.E.
NYSDEC Region 4
Office of Environmental Quality
1130 North Westcott Road
Schenectady, New York 12306-2014

via Email @ christopher.oneill@dec.ny.gov

Subject: Remedial Investigation Work Plan - Addendum
Troy Belting & Supply Company, Colonie, NY
Brownfield Cleanup Program, BCP ID C401067
STERLING File #2011-31 (Task 900)

Dear Mr. O'Neill,

Sterling Environmental Engineering, P.C. (STERLING), on behalf of Troy Belting & Supply Company (Troy Belting), provides this Addendum to the approved Remedial Investigation (RI) Work Plan (WP), dated June 30, 2014 and amended July 15, 2015, to address quarterly sampling of existing monitoring wells MW-3S, -5S, -6S, -6D, -6D', -7S, -7D, -8S, and -10D and to collect a synoptic round of water levels/potentiometric surface measurements for all onsite and offsite monitoring wells. Samples from the monitoring wells listed above will be analyzed for Volatile Organic Compounds (VOCs) only. The purpose of the additional groundwater sampling program is to further characterize seasonal variability and existing state of groundwater flow and groundwater quality in the various hydrogeologic units at the site and surrounding area. The methods and procedures for well purging, groundwater sampling, and investigation derived waste (IDW) management will remain as outlined in the approved RIWP. The locations of the onsite and offsite monitoring wells are shown on Figure 1.

This supplemental information will be collected in support of the RI and to refine a remedial strategy for the Source Area, if applicable. STERLING will perform this work as part of this Brownfield Cleanup Program project, consistent with the Field Activities Plan for the groundwater investigation (Section 3.0) in accordance with quality assurance/quality control and health and safety requirements as specified in the approved RIWP.

The subject groundwater sampling will be initiated on Thursday, February 23, 2017, if approved. Please contact me should you have any questions.

Very truly yours,

STERLING ENVIRONMENTAL ENGINEERING, P.C.



Mark A. Williams, P.G. (PA)
Associate Geologist
mark.williams@sterlingenvironmental.com

"Serving our clients and the environment since 1993"

MAW/bc

Email/First Class Mail

Attachment: Figure 1

cc: Jason Smith, Troy Belting & Supply Company
David Barcomb, Troy Belting & Supply Company (Email)
Ruth Leistensnider, Nixon Peabody, LLP
Richard Mustico, NYSDEC (Email)
Steven Karpinski, NYSDOH (Email)
Justin Deming, NYSDOH (Email)
Richard Ostrov, Esq., NYSDEC (Email)

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STERLING
Sterling Environmental Engineering, P.C.

March 10, 2017

Mr. Christopher O'Neill, P.E.
NYSDEC Region 4
Office of Environmental Quality
1130 North Westcott Road
Schenectady, New York 12306-2014

Via Email (christopher.oneill@dec.ny.gov)

Subject: Vapor Mitigation System (VMS) Monitoring Reduction Request
BCP Site No. C401067
Troy Belting & Supply Company, Colonie, New York
STERLING File #2011-31 (Task 910)

Dear Mr. O'Neill,

In accordance with the provisions for modifying the January 4, 2017 approved Vapor Mitigation System (VMS) Operations, Maintenance and Monitoring (OM&M) Plan, Troy Belting & Supply Company (Troy Belting) seeks to modify:

1. the VMS treatment train operation, and,
2. the monitoring and the associated Reporting Schedule (provided as Appendix D in the OM&M Plan) for the monitoring of the VMS.

Specifically, this modification request is to:

1. bypass the activated carbon canisters in the sub-slab soil vapor treatment system, and,
2. reduce from monthly to quarterly, the frequency of monitoring of the sub-slab pressures, and volatile organic compound (VOC) in the sub-slab soil vapor and the VMS.

Background

The VMS has been operating in its present configuration since October 30, 2015. Sampling and monitoring of the VMS has been performed by Troy Belting and Sterling Environmental Engineering, P.C. since the startup of the system in accordance with requests from the New York State Department of Environmental Conservation (NYSDEC) and New York State Department of Health (NYSDOH), and the monitoring activities specified in the OM&M Plan.

VMS Monitoring by Summa Canisters

Vapor samples from the VMS have been collected and analyzed for VOCs on a quarterly basis since April 2016, in accordance with Section 8.0 and the Reporting Schedule in the OM&M Plan (see Table 1). Analytical results for each sampling event in 2016, from both soil vapor prior to treatment, and treated soil vapor, have been used to calculate offsite emissions for comparison to the Air Guide 1 values

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contained in the NYSDEC Policy DAR-1: Guidelines for the Control of Toxic Ambient Air Contaminants (DAR-1), dated August 10, 2016. The calculated emission concentrations shown in Table 2 (column 3) are several orders of magnitude lower than the Short-Term Guideline Concentration (SGC) and Annual Guideline Concentration (AGC) values contained in DAR-1. The calculations demonstrate that downwind concentrations would be much less than the designated SGC or AGC, and that sub-slab soil vapor from the VMS may be safely exhausted without activated carbon treatment.

The VOC concentrations in the sub-slab vapor were monitored after the VMS was shutdown in the Fall of 2016. Table 2 utilizes the sub-slab soil vapor concentrations after the VMS was shutdown for six weeks to compute the downwind concentrations in the breathing zone for the case of emitting those vapors untreated. The highest concentrations of each compound detected in SV-1 or SV-7 were used to calculate the total annual emission (lbs/yr) using the DAR-1 model. The resulting annual impact values and short term impact values were calculated using DAR-1 and are compared to the SGCs and AGCs from DAR-1. The highest concentration of the individual Indoor Air COCs were selected from the sub-slab soil vapor concentrations found in SV-1 and SV-7 sampling locations for use in the DAR-1 model. Results indicate untreated soil vapor concentrations after the VMS is shutdown for six weeks are one (1) to six (6) orders of magnitude less than the AGC or SGC.

VMS Monitoring by Photoionization Detectors (PIDs)

Two (2) activated carbon canisters are used to remove site contaminants of concern (COCs) from the sub-slab soil vapor before it is emitted to the outdoor air. Monthly monitoring events for 2016 measured VOC concentrations immediately before, between, and after the carbon canisters using a PID. VOCs were not detected by PID monitoring at between the carbon canisters or after the carbon canisters until the monitoring performed on February 28, 2017. The results of the PID monitoring are presented in Table 4 (attached), and will be provided to the NYSDEC in the quarterly monitoring reports. The February 28, 2017 PID monitoring results indicate low-level detections of VOCs between the carbon canisters, and possibly in the VMS exhaust compared to the January 31, 2017 PID readings of 0.0 ppm. The recent PID readings do not affect the analysis and calculations above supporting the request to bypass the activated carbon in the VMS.

Request to Bypass Carbon Treatment

In accordance with January 4, 2017 Section 4.2.6 of the VMS Construction Completion Report (CCR), Troy Belting requests that NYSDEC allow discharge of soil vapor from the VMS without being treated by activated carbon. This request is based on, and supported by, the results of monitoring which indicates that the modeled downwind air concentrations in the breathing zone resulting from the emissions will not exceed applicable Air Guide 1 annual and short-term guidelines.

The sub-slab pressure values presented in Table 3 indicate that a negative pressure is maintained beneath the building slab in the vicinity of the source of the VOCs when the VMS is operating. The results of PID monitoring for volatile organic vapors, presented in Tables 4 and 5 indicate that operation of the VMS continues to remove soil vapor containing low levels of VOCs.

Request to Reduce Frequency of Pressure and PID Monitoring Activities

In accordance with Section 8.2 of the OM&M Plan, Troy Belting requests the frequency of the pressure and PID monitoring be reduced from monthly to quarterly, and be concurrent with the VMS Treatment Train chemical sampling events, based on the sub-slab pressure monitoring (Table 3), and the results of PID monitoring of sub-slab soil vapor (Table 5) and the VMS (Table 4). This revision in frequency will require modification of Section 8.1.3 and the Reporting Schedule of the OM&M Plan, dated January 4, 2017. Revisions to Section 8.1.3 and the Reporting Schedule will be made to the OM&M Plan upon approval of this request for reduction of monitoring.

Please contact me should you have any questions.

Very truly yours,

STERLING ENVIRONMENTAL ENGINEERING, P.C.



Rodney L. Aldrich, P.E.

Director of Compliance

rodney.aldrich@sterlingenvironmental.com

RLA/bc

Email/First Class Mail

Attachments (Tables 1-5)

cc: Jason Smith, Troy Belting & Supply Company
David Barcomb, Troy Belting & Supply Company (Email Only)
Ruth Leistensnider, Nixon Peabody, LLP
Rick Mustico, NYSDEC (Email Only)
Steven Karpinski, NYSDOH (Email Only)
Justin Deming, NYSDOH (Email Only)
Richard Ostrov, Esq., NYSDEC (Email Only)

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

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March 20, 2017

Troy Belting and Supply Company
Attn: Jason W. Smith
70 Cohoes Road
Watervliet, NY 12189

RE: BCP Site No. C401067
Troy Belting and Supply Company

Dear Mr. Smith:

The New York State Department of Environmental Conservation (NYSDEC) and New York State Department of Health (NYSDOH) have reviewed the "Vapor Mitigation System (VMS) Monitoring Reduction Request" ("VMS Monitoring Request") for the Troy Belting and Supply Company (Troy Belting) Brownfield Cleanup Program (BCP) site. The VMS Monitoring Request was prepared by Sterling Environmental Engineering, P.C. (Sterling Environmental) on behalf of Troy Belting, and was submitted on March 10, 2017.

NYSDEC and NYSDOH hereby approve of the requested by-pass/disconnection of the carbon treatment units and their associated pre-heater, and the requested reduction in monitoring events. The approved treatment train and monitoring schedule changes are effective following the 1st Quarter 2017 quarterly monitoring activities, and are subject to reinstatement or other adjustments based on, but not limited to, effluent vapor odor/nuisance issues, system operational deficiencies, and future approved remedial actions.

By April 21, 2017, please submit a new cover sheet (a sample is attached) for the Vapor Mitigation System Operations, Monitoring and Maintenance (OM&M) Plan, and "OM&M Plan Addendum #1", including a brief description of the changes being made and a revised reporting Schedule table.

I can be reached at 518-357-2394 if there are any questions.

Sincerely,



Christopher O'Neill, P.E.
Professional Engineer 1

Enclosure



Department of
Environmental
Conservation

EC with enclosure:

J. Smith, Troy Belting
R. Leistensnider, Nixon Peabody
R. Aldrich, Sterling Environmental
T. Johnson, Sterling Environmental

S. Karpinski, NYSDOH
J. Deming, NYSDOH
R. Ostrov, NYSDEC
R. Mustico, NYSDEC

Letter.bcp.C401067.2017-03-20.comment letter for VMS Monitoring

APPENDIX C

FRACTURE TRACE ANALYSIS REPORT