



Submitted via email

April 3, 2020

Greta White
New York State Department of Environmental Conservation
Division of Environmental Remediation
625 Broadway, 11th Floor
Albany, NY 12233-7014

Re: Site Management Plan Periodic Review Report
Catskill MGP Site
NYSDEC Site No. C420027

Dear Ms. White:

This Periodic Review Report serves to document the status of Engineering Controls (ECs) and Institutional Controls (ICs) established in accordance with the December 2014 Site Management Plan (SMP) for the Catskill former manufactured gas plant (MGP) site located in Catskill, New York. The SMP addressed the means for implementing and periodically inspecting ECs/ICs required by the remedy for the site.

ECs/ICs at the site include:

Soil Cover – Exposure to remaining contamination in soil/fill at the Site is prevented by a soil cover system placed over the Site. This cover system is comprised of a minimum of 12 inches of imported clean fill, asphalt pavement, concrete-covered sidewalks, and concrete building slabs. Procedures for operating and maintaining the soil cover system are documented in the Operation and Maintenance Plan (Section 4 of the SMP). Procedures for monitoring the system are included in the Monitoring Plan (Section 3 of the SMP). The Monitoring Plan also addresses severe condition inspections in the event that a severe condition, which may affect controls at the Site, occurs.

Monitored Natural Attenuation – Groundwater monitoring activities to assess natural attenuation will continue, as determined by the New York State Department of Environmental Conservation (NYSDEC), until residual groundwater concentrations are found to be consistently below NYSDEC standards or have become asymptotic at an acceptable level over an extended period. Monitoring will continue until permission to discontinue is granted in writing by the NYSDEC. If groundwater contaminant levels become asymptotic at a level that is not acceptable to the NYSDEC, additional source removal, treatment and/or control measures will be evaluated.

Environmental Easements – The Site has a series of ICs in the form of Site restrictions (groundwater and land use, monitoring plan, and SMP) to: (1) implement, maintain and monitor EC systems; (2) prevent future exposure to remaining contamination by controlling disturbances of the subsurface contamination; and, (3) limit the use and development of Areas A to restricted residential, commercial, and/or industrial uses and Areas B and C to commercial and/or industrial uses only. Adherence to these ICs on the site is required by the Environmental Easements and implemented under the SMP.

EC/IC Inspection Results and On-Going Groundwater Monitoring Summary

An annual EC/IC site inspection was conducted on March 13, 2020. Copies of the Site-Wide and Site Cover Inspection Forms and photographs are attached to this letter for review. Based on these inspections it was observed that each of the ECs/ICs was in place, performing properly, and remain effective. Additionally, no corrective actions were necessary.

Semi-annual monitoring events were conducted during the reporting period in August 2019 and February 2020 and results were submitted to the NYSDEC. Dissolved constituents detected in the groundwater samples were limited to select polycyclic aromatic hydrocarbons (PAHs) and benzene, toluene, ethylbenzene, and total xylene (BTEX) compounds. Overall, concentrations within the monitoring well network continue to remain consistent with historic trends.

Certification of ECs/ICs

The NYSDEC Institutional and Engineering Controls Certification Form has been completed and is attached to this letter for review. As stated above, each of the ECs/ICs are in place, performing properly, and remain effective. Additionally, no corrective actions are necessary.

Please contact me at (845) 486-5461 or mmclean@cenhud.com if you have any questions.

Sincerely,



Mark L. McLean
Senior Project Manager

Attachments

cc:

Julia Kenney, NYSDOH
Justin Deming, NYSDOH
Wayne Mancroni, Central Hudson
Jesse Gallo, Central Hudson

Photographic Documentation

P1



March 2020: View looking east across Catskill Creek towards the site.

P2



March 2020: View looking south along shoreline of Area A.

P3



March 2020: View looking northeast from Catskill Creek towards Area C paved parking lot.

P4



March 2020: View looking northeast from Water Street towards Art Studio building and parking lot within Area B.

Site-Wide and Site Cover Inspection Forms

Site-Wide Inspection Form
Central Hudson Gas & Electric Corp.
Catskill Former MGP Site
Water Street, Catskill, New York

In accordance with the site-specific 2014 Site Management Plan, site-wide inspections are to be performed annually, or after flooding or storm event. Copies of this inspection form will be included in the Periodic Review Review and in other correspondence to NYSDEC and NYSDOH.

Date: March 13, 2020	Inspection Performed By: Jesse Gallo
Weather: 44°; Overcast; Calm winds; Rain	Inspector Title: MGP Project Manager
	Company: Central Hudson Gas & Electric
Date of Most Recent Precipitation Event and Total Precipitation Amount: March 13, 2020, 0.03 inches	

Engineering Controls
<p>Site Cover: <i>Is the site cover intact? Document any breaches in the site cover below. Include site sketch.</i> Yes</p> <p><i>Document corrective actions recommended/taken:</i> None</p>
<p>Monitoring Wells: <i>Are all groundwater monitoring wells in the monitoring well network intact? Document any loss of integrity, signs of vandalism, etc.</i> Yes</p> <p><i>Document corrective actions recommended/taken:</i> None</p>
Institutional Controls
<p>Site Management Plan: <i>Is a copy of the Site Management Plan onsite?</i> A copy of the Site Management Plan is located at the CHGE Facility: 284 South Avenue, Poughkeepsie, NY.</p>
<p>Environmental Easement: <i>Is the Environmental Easement still in place? Is a copy of the Environmental Easement onsite?</i> Yes. A copy of the Easement is located at the CHGE Facility: 284 South Avenue, Poughkeepsie, NY and recorded with the Greene County Clerk.</p>

Site Cover Inspection Form
Central Hudson Gas & Electric Corp.
Catskill Former MGP Site
Water Street, Catskill, New York

In accordance with the site-specific 2014 Site Management Plan, inspections of the site cover are to be performed annually, or after flooding or storm event. Copies of this inspection form will be included in the Periodic Review Review and in other correspondence to NYSDEC and NYSDOH.

Date: March 13, 2020	Inspection Performed By: Jesse Gallo
Weather: 44°; Overcast; Calm winds; Rain	Inspector Title: MGP Project Manager
	Company: Central Hudson Gas & Electric
Date of Most Recent Precipitation Event and Total Precipitation Amount: March 13, 2020, 0.03 inches	

Site Cover
<p><i>Is the site cover intact? Document any breaches in the site cover below. Include site sketch.</i></p> <p>Yes</p>
<p><i>Document corrective actions recommended:</i></p> <p>None</p>
<p><i>Document corrective actions taken:</i></p> <p>None</p> <p>Corrective actions performed by _____ on _____.</p>
General Comments

**NYSDEC Institutional and Engineering Controls
Certification Form**



Enclosure 2
NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
 Site Management Periodic Review Report Notice
 Institutional and Engineering Controls Certification Form



	Site Details	Box 1
Site No. C420027		
Site Name CH - Catskill Former Manufactured Gas Plant (MGP)		
Site Address: Water Street Zip Code: 12414		
City/Town: Catskill		
County: Greene		
Site Acreage: 0.878		
Reporting Period: March 31, 2019 to March 31, 2020		
		YES NO
1. Is the information above correct?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
If NO, include handwritten above or on a separate sheet.		
2. Has some or all of the site property been sold, subdivided, merged, or undergone a tax map amendment during this Reporting Period?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3. Has there been any change of use at the site during this Reporting Period (see 6NYCRR 375-1.11(d))?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4. Have any federal, state, and/or local permits (e.g., building, discharge) been issued for or at the property during this Reporting Period?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
If you answered YES to questions 2 thru 4, include documentation or evidence that documentation has been previously submitted with this certification form.		
5. Is the site currently undergoing development?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		Box 2
		YES NO
6. Is the current site use consistent with the use(s) listed below?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
7. Are all ICs/ECs in place and functioning as designed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
IF THE ANSWER TO EITHER QUESTION 6 OR 7 IS NO, sign and date below and DO NOT COMPLETE THE REST OF THIS FORM. Otherwise continue.		
A Corrective Measures Work Plan must be submitted along with this form to address these issues.		
 Signature of Owner, Remedial Party or Designated Representative		3/17/20 Date

SITE NO. C420027

Box 3

Description of Institutional Controls

<u>Parcel</u>	<u>Owner</u>	<u>Institutional Control</u>
156.78-2-40	Greene County c/o Willis Vermilyea	Ground Water Use Restriction Landuse Restriction Monitoring Plan Site Management Plan
156.78-3-1	Catskill 125, LLC	Ground Water Use Restriction Landuse Restriction Monitoring Plan Site Management Plan
156.78-3-3	Thomas B. Thornton	Ground Water Use Restriction Landuse Restriction Monitoring Plan Site Management Plan

Box 4

Description of Engineering Controls

<u>Parcel</u>	<u>Engineering Control</u>
156.78-2-40	Cover System
156.78-3-1	Cover System
156.78-3-3	Cover System

Periodic Review Report (PRR) Certification Statements

1. I certify by checking "YES" below that:

a) the Periodic Review report and all attachments were prepared under the direction of, and reviewed by, the party making the certification;

b) to the best of my knowledge and belief, the work and conclusions described in this certification are in accordance with the requirements of the site remedial program, and generally accepted engineering practices; and the information presented is accurate and complete.

YES NO

2. If this site has an IC/EC Plan (or equivalent as required in the Decision Document), for each Institutional or Engineering control listed in Boxes 3 and/or 4, I certify by checking "YES" below that all of the following statements are true:

(a) the Institutional Control and/or Engineering Control(s) employed at this site is unchanged since the date that the Control was put in-place, or was last approved by the Department;

(b) nothing has occurred that would impair the ability of such Control, to protect public health and the environment;

(c) access to the site will continue to be provided to the Department, to evaluate the remedy, including access to evaluate the continued maintenance of this Control;

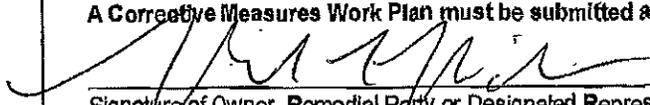
(d) nothing has occurred that would constitute a violation or failure to comply with the Site Management Plan for this Control; and

(e) if a financial assurance mechanism is required by the oversight document for the site, the mechanism remains valid and sufficient for its intended purpose established in the document.

YES NO

**IF THE ANSWER TO QUESTION 2 IS NO, sign and date below and
DO NOT COMPLETE THE REST OF THIS FORM. Otherwise continue.**

A Corrective Measures Work Plan must be submitted along with this form to address these issues.


Signature of Owner, Remedial Party or Designated Representative

3/17/20
Date

IC CERTIFICATIONS
SITE NO. C420027

Box 6

SITE OWNER OR DESIGNATED REPRESENTATIVE SIGNATURE

I certify that all information and statements in Boxes 1, 2, and 3 are true. I understand that a false statement made herein is punishable as a Class "A" misdemeanor, pursuant to Section 210.45 of the Penal Law.

I MARK L. McLEAN at CENTRAL HUDSON GAS & ELECTRIC
284 SOUTH AVE., POUGHKEEPSIE, NY 12601
print name print business address

am certifying as REMEDIAL PARTY (Owner or Remedial Party)

for the Site named in the Site Details Section of this form.

[Signature]
Signature of Owner, Remedial Party, or Designated Representative
Rendering Certification

3/17/20
Date

IC/EC CERTIFICATIONS

Box 7

Professional Engineer Signature

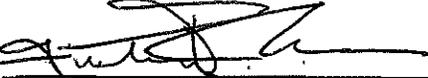
I certify that all information in Boxes 4 and 5 are true. I understand that a false statement made herein is punishable as a Class "A" misdemeanor, pursuant to Section 210.45 of the Penal Law.

KLEINFELDER ENGINEERING, P.C.

JUSTIN MOSES
print name

at 1200 VETERANS MEMORIAL HWY, SUITE 300
print business address HAUPOUGE, NY 11788

am certifying as a Professional Engineer for the REMEDIAL PARTY
(Owner or Remedial Party)


Signature of Professional Engineer, for the Owner or Remedial Party, Rendering Certification



4/3/20
Date