



**NORTHEAST TREATERS OF NEW YORK, LLC
GREENE COUNTY, NEW YORK**

**Periodic Review Report
(September 1, 2020 – September 1, 2021)**

NYSDEC Site Number: C420029

Prepared for:

Northeast Treaters of New York, LLC
796 Schoharie Turnpike
Athens, New York 12015

Prepared by:

Sterling Environmental Engineering, P.C.
24 Wade Road
Latham, New York 12110

August 16, 2021

Revised:
October 12, 2021

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**NORTHEAST TREATERS OF NEW YORK, LLC
GREENE COUNTY, NEW YORK**

**PERIODIC REVIEW REPORT
(September 1, 2020 – September 1, 2021)**

NYSDEC SITE #C420029

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CERTIFICATION

For each institutional or engineering control identified for the Site, I, Andrew M. Millspaugh, P.E., certify that all of the following statements are true:

- a) The inspection of the Site to confirm the effectiveness of the institutional and engineering controls required by the remedial program was performed under my direction;
- b) The institutional control and/or engineering control employed at this Site is unchanged from the date the control was put in place, or last approved by DER;
- c) Nothing has occurred that would impair the ability of such control to protect public health and the environment;
- d) Nothing has occurred that would constitute a violation or failure to comply with any Site Management Plan for this control;
- e) Access to the Site will continue to be provided to DER to evaluate the remedy, including access to evaluate the continued maintenance of this control;
- f) Use of the Site is compliant with the environmental easement;
- g) The engineering control systems are performing as designed and are effective;
- h) 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,
- i) The information presented in this report is accurate and complete.



Andrew M. Millspaugh, P.E.

10/12/2021

Date

EXECUTIVE SUMMARY

The Site is located at 796 Schoharie Turnpike in the Town of Athens, Greene County, New York (see Figure 1) and is identified as a portion of Athens Tax Map Parcel 104.00-4-44. The Site is an approximate 4.0-acre area bounded by Northeast Treaters' facility stormwater basin to the north, a commercial garage to the south, undeveloped lands of Northeast Treaters to the east, and the Northeast Treaters lumber storage yard to the west (see Figure 2).

The Site consists of a wood treatment process building and a lumber storage area. The Site is zoned Industrial and is currently utilized for industrial wood treatment and storage by Northeast Treaters. The immediate vicinity of the Site primarily includes industrial, commercial, rural residential, and agricultural properties.

The Site has been investigated and remediated under the New York State Department of Environmental Conservation's (NYSDEC) Brownfield Cleanup Program (BCP) and is identified as BCP Site No. C420029. Remedial activities were completed in 2016 in accordance with the October 2, 2015 Remedial Work Plan and the December 7, 2015 Remedial Work Plan Addendum to address sediment and soil impacted with heavy metals arsenic and chromium. The selected remedy included excavation of impacted soil and sediment and consolidation onsite beneath a protective cover.

A Certificate of Completion (COC) issued by the NYSDEC on November 14, 2016 and a Site Management Plan (SMP) dated July 15, 2016 are in place for the Site. This Periodic Review Report (PRR) presents results of monitoring activities outlined in the SMP for the September 1, 2020 to September 1, 2021 reporting period, which includes a Site-wide inspection and post-remediation media sampling conducted August 5, 2021.

The remedial program implemented at the Site has been successful in meeting the Remedial Action Objectives set forth in the NYSDEC Decision Document. The Site-wide inspection confirmed the protective cover remains intact and functional. Post-remediation media sampling of sediment confirmed off-site migration of Site impacts is not occurring. No areas of non-compliance with the SMP were identified.

Based on results of monitoring activities through September 2021, the approved SMP is recommended to be modified to include one additional sediment sampling location from the western settling basin exit swale. The additional sampling location was determined in coordination with NYSDEC as described in this PRR. The requirements for discontinuing Site management have not been met at this time.

1.0 INTRODUCTION

Sterling Environmental Engineering, P.C. (STERLING) prepared this Periodic Review Report (PRR) on behalf of Northeast Treaters of New York, LLC (Northeast Treaters) for Brownfield Cleanup Program (BCP) Site No. C420029 ("Site"). The Site is located at 796 Schoharie Turnpike in the Town of Athens, Greene County, New York (see Figure 1). The Site is an approximate 4.0-acre area, identified as a portion of Athens Tax Map Parcel 104.00-4-44, bounded by Northeast Treaters' facility stormwater basin to the north, a commercial garage to the south, undeveloped lands of Northeast Treaters to the east, and the Northeast Treaters lumber storage yard to the west (see Figure 2). The Site has been investigated and remediated under the New York State Department of Environmental Conservation's (NYSDEC) BCP. Remedial activities were completed in 2016 in accordance with the October 2, 2015 Remedial Work Plan and the December 7, 2015 Remedial Work Plan Addendum. A Certificate of Completion (COC) was issued by the NYSDEC on November 14, 2016.

A Site Management Plan (SMP) dated July 15, 2016 is in place for the Site. This PRR presents results of monitoring activities outlined in the SMP for the September 1, 2020 to September 1, 2021 reporting period, which includes a Site-wide inspection and post-remediation media sampling conducted August 5 and September 7, 2021.

1.1 Summary of Site Contamination

The Site consists of a wood treatment process building and a lumber storage area. The Site is zoned Industrial and is currently utilized for industrial wood treatment and storage by Northeast Treaters. The immediate vicinity of the Site primarily includes industrial, commercial, rural residential, and agricultural properties. The Site began operation as a pressure treating wood manufacturing facility in 1979. For a period of time, the facility utilized chromated copper arsenate (CCA) to pressure treat wood products. In 2003, the facility switched to Micronized Copper Azole, a non-hazardous preservative.

The nature and extent of contamination at the Site are documented in the August 3, 2015 Remedial Investigation Report. Heavy metals chromium and arsenic were detected during the Remedial Investigation in surficial soils within the boundaries of the Site and in the settling basin located beyond the boundaries of the Site at the westernmost portion of the Northeast Treaters property (hereafter "western settling basin").

Soil and Sediment

Several soil and sediment samples collected at the Site, in offsite facility catch basins, and the facility's western settling basin reported parameter concentrations that exceed Part 375-6.8(a) Unrestricted Use Soil Cleanup Objectives (UUSCO) for chromium and arsenic.

Site-Related Groundwater

Groundwater analytical data determined that perched water and bedrock groundwater were not impacted by Site contaminants of concern.

Site-Related Soil Vapor Intrusion

Based upon the documented Site history, previous investigations, and analytical results obtained during the RI, no risk of soil vapor intrusion is associated with the Site because no volatile organic compounds (VOC) were detected in onsite soils. Furthermore, the Site does not have a documented history of storing or using chlorinated VOCs.

1.2 Remedial Elements

The physical elements of the selected remedy are as follows:

- Cover System – A Site protective cover to allow for commercial use of the Site. The cover consists of a combination of structures comprising the Site development (i.e., new Process Building and pavement) or one (1) foot of soil cover over a geotextile demarcation layer. The one (1) foot of soil cover meets the requirements of 6 NYCRR Part 375-6.7(d).
- Limited Excavation – Excavation of impacted soil/sediment in the vicinity of the facility’s basin exit swale, located downgradient of the facility’s western settling basin. Excavated soil was consolidated onsite under the cover system.
- Removal of all Sediment from Impacted Catch Basins – Removal of impacted stormwater sediment from facility catch basins located hydraulically downgradient from the Site. Sediment removed from impacted catch basins was consolidated onsite under the cover system.
- Offsite Settling Basin Closure Plan – In accordance with the NYSDEC Decision Document, a Closure Plan for the western settling basin was prepared and will be implemented when the facility permanently ceases use of the basin. The Closure Plan is included in the SMP.

1.3 Remedial Action Objectives

The Remedial Action Objectives (RAO) for the Site as listed in the Decision Document dated December 31, 2015 are as follows:

Soil

RAOs for Public Health Protection

- Prevent ingestion/direct contact with contaminated soil.

RAOs for Environmental Protection

- Prevent migration of contaminants that could result in groundwater or surface water impacts.
- Prevent impacts to biota from ingestion/direct contact with soil causing toxicity or impacts from bioaccumulation through the terrestrial food chain.

Sediment

RAOs for Public Health Protection

- Prevent direct contact with contaminated sediments.

RAOs for Environmental Protection

- Restore sediments to pre-release/background conditions to the extent feasible.

2.0 EVALUATION OF REMEDY PERFORMANCE, EFFECTIVENESS AND PROTECTIVENESS

This section provides an evaluation of the extent to which the implemented remedy meets the remedial objective to minimize or eliminate exposure pathways or significant risks to the public or the environment under the conditions of the contemplated use of the Site (i.e., Restricted Commercial and Industrial).

2.1 Performance

The potential migration of and exposure to remaining impacted media are prevented by the Site protective cover. Concentrations of chromium and arsenic detected in sediment samples obtained on August 5, 2021 at the western settling basin exit swale exceeded the applicable Standards, Criteria, and Guidance (SCG) for arsenic at the farthest downstream sampling location (MP-D). An onsite meeting was held with NYSDEC on August 26, 2021 to review the MP-D sample location. Based on the meeting, four additional samples were collected on September 7, 2021 as reported in the summary letter contained in Appendix D.

2.2 Effectiveness

The selected remedy is an effective short-term and long-term remedial measure. The selected remedy immediately eliminated the potential for human and environmental exposure to impacted Site media. Sediment sampling at the western settling basin exit swale monitors the effectiveness of the remedy and for impacts from residual contaminants. Post-remediation media sampling is an accepted method of monitoring the long-term effectiveness of remediation. There are no known risks to workers, the community, or the environment from the selected remedy. No areas of non-compliance with the SMP were identified.

2.3 Protectiveness

Results of the August 5 and September 7, 2021 monitoring and sampling indicate the area of contamination remains localized to the Site beneath the protective cover. The potential migration of and exposure to remaining onsite impacted media are prevented by the Site protective cover. Offsite migration from the western settling basin is not occurring, as documented by exit swale sediment samples. Detected concentrations of arsenic exceeding applicable SCGs are within the known range of arsenic reported in the Remedial Investigation Report and Final Engineering Report at the completion of excavation activities within the western settling basin exit swale. Therefore, the implemented remedy achieves the Site RAOs.

3.0 IC/EC COMPLIANCE REPORT

3.1 Institutional Controls

The Institutional Control (IC) for the Site consists of an Environmental Easement (EE) that includes land use restrictions, an SMP, and certification reporting. The EE prohibits the use of the property for any means other than the contemplated Restricted Commercial and Industrial Use. The EE requires compliance with the SMP, including the periodic reporting covered by this report. The EE for the property that outlines the use restrictions was filed in Greene County on September 20, 2016 (Receipt No. 20160020459).

3.2 Engineering Controls

Exposure to remaining impacted media is prevented by the Site protective cover. The type of cover varies across the Site and comprises a demarcation geotextile fabric covered by an asphalt pavement profile, concrete structural components, or a minimum of one (1) foot soil cover. The Excavation Work Plan (EWP) provided in the SMP outlines required procedures if the cover system is breached, penetrated, or temporarily removed exposing the underlying impacted media. Procedures for the inspection and maintenance of this cover system are provided in the Monitoring Plan included in the SMP.

3.3 Corrective Measures

The Site ICs/ECs are fully in place and effective. Therefore, no corrective measures are proposed at this time.

3.4 IC/EC Certification

The NYSDEC IC/EC Certification Form is provided as Appendix A.

4.0 MONITORING PLAN COMPLIANCE REPORT

4.1 Components of the Monitoring Plan

Components of the monitoring plan are summarized below.

Monitoring Plan Components	
Inspections:	Frequency
1. Cover Inspection	Annually
Monitoring:	
1. Sediment Sampling at Drainage Swale Downgradient of SPDES Outfall #001* for total chromium and arsenic	Annually
Maintenance:	
1. Cover Maintenance	As needed
2. Swale Maintenance	As needed
Reporting:	
1. Periodic Review Report	Annually

*SPDES Outfall #001 is monitored pursuant to Multi-Sector General Permit (MSGP) No. NYR00B991 independent of the SMP.

4.1.1 Site-Wide Inspection

The Site protective cover was visually inspected for potholes and cracks wider than 1/4 inch. Soil cover was visually inspected for signs of erosion and areas of bare soil. The condition of the building slab at the

wood treatment process building was visually inspected for cracks and penetrations.

Maintenance of the Site protective cover will be conducted by the property owner as needed based on inspection observations.

4.1.2 Post-Remediation Media Monitoring and Sampling

Sediment samples were collected from the following outflow locations of the western settling basin as shown on Figure 3:

Post Remediation Sediment Sampling Requirements and Schedule

Sediment Sampling Locations	Analytical Parameters	Schedule
MP-U MP-M MP-D	TAL Metals – USEPA Method 6010D (Total Arsenic and Total Chromium Only)	Annually

Sampling of sediment that accumulates in the western settling basin exit swale were performed to assess the quality of the sediment following completion of the remedial actions. Modification to the sampling frequency or sampling requirements may only be modified with the approval of the NYSDEC.

The sediment sample locations were designed based on existing and anticipated drainage of the Site. The three (3) sediment samples are located along the western settling basin exit swale at upstream, mid-stream, and downstream sections of the swale as shown in Figure 3. Surface sediment samples were collected at each location between grade surface and approximately two (2) inches below grade. Samples were analyzed for total arsenic and total chromium via USEPA Method 6010D.

In the event that average concentrations of arsenic and/or chromium (and/or individual hot spot areas) are detected in the western settling basin exit swale above restricted commercial-use CUSCOs, the facility owner will prepare a Response Plan to address impacted sediment to be submitted to, and approved by, the NYSDEC. In addition, the SMP provides that an Investigation Work Plan will be prepared at the time the facility ceases use of the western settling basin to delineate the extent of lateral and vertical impact to soil and sediment located hydraulically downgradient of the basin.

4.2 Summary of Monitoring Data

4.2.1 Results of Site-Wide Inspection

A comprehensive Site-wide inspection was conducted on August 5, 2021 in accordance with the SMP. The Site-Wide Inspection Form and photographs are provided as Appendix B.

The Site-wide inspection determined the asphalt pavement, concrete structural components, and soil cover are in good condition with no corrective actions required. A small asphalt patch was observed to facilitate repair of a protective bollard (see photolog in Appendix B).

4.2.2 Results of Post-Remediation Media Monitoring and Sampling

Post-remediation media monitoring and sampling were conducted on August 5, 2021 in accordance with the SMP. Sediment sample locations are provided in Figure 3, and the corresponding laboratory analytical report is provided in Appendix C.

Field sampling locations were located using a Trimble global positioning system (GPS) to ensure sampling occurred at the locations specified in the SMP. At the time of sampling, the water level within the channel was approximately one (1) foot deep. Samples were collected directly along the swale channel centerline.

A summary of post-remediation media sampling results is provided on the following table.

Summary of Post-Remediation Sediment Sampling Results								
	Arsenic, Total (mg/kg) CUSCO = 16 UUSCO = 13				Chromium, Total (mg/kg) CUSCO = 1,500 UUSCO = 30			
DATE	MP-U	MP-M	MP-D	AVG	MP-U	MP-M	MP-D	AVG
8/13/2018	13.0	14.4	9.15	12.18	23.5	34.8	20.1	26.13
8/19/2019	14.5	12.7	19.5	15.57	22.7	21.0	51.9	31.87
8/25/2020	9.26	7.85	20.3	12.47	17.5	18.6	31.3	22.47
8/5/2021	7.3	9.33	22.2	12.94	19.5	20.2	47.7	29.13

Notes:

CUSCO: NYSDEC Restricted Commercial Use Soil Cleanup Objectives per 6 NYCRR Part 375-6.8.

UUSCO: NYSDEC Unrestricted Use Soil Cleanup Objectives per 6 NYCRR Part 375-6.8.

Detections of total chromium were compared to trivalent chromium SCOs because previous Site sampling indicated that chromium speciation is predominantly trivalent. Concentrations of chromium are orders of magnitude below the CUSCO.

Concentrations of arsenic in the MP-U and MP-M samples from western settling basin exit swale are below CUSCO. The concentration of arsenic in the MP-D sample exceeded the CUSCO for the third consecutive annual monitoring event; however, the average arsenic concentration has remained consistent and below the CUSCO. The detected concentrations are within the known range of arsenic reported in the Remedial Investigation Report and Final Engineering Report at the completion of excavation activities in the western settling basin exit swale. Furthermore, the consistent arsenic concentration at sampling location MP-D from 2019 to 2021 suggests migration of arsenic-impacted sediment from the settling basin is not occurring. Based on increasing arsenic concentrations at the discrete MP-D location, NYSDEC requested that four additional samples be collected as summarized in the October 4, 2021 letter provided in Appendix D.

5.0 OVERALL PRR CONCLUSIONS AND RECOMMENDATIONS

5.1 Compliance with SMP

All requirements of the SMP (i.e., site inspection, monitoring, and IC/EC certification) have been complied with for the reporting period.

5.2 Performance and Effectiveness of the Remedy

The results of the Site-wide inspection and post-remediation media monitoring and sampling suggest that Site engineering controls are effectively achieving RAOs.

5.3 Future PRR Submittals

The submittal frequency of future PRRs will remain on an annual basis.

5.4 Recommendations

Based on results of monitoring activities through September 2021, the approved SMP is recommended to be modified to include the MP-1 sample location at the downgradient property line as shown in the October 4, 2021 summary letter provided in Appendix D. No changes to the PRR reporting frequency are recommended. The requirements for discontinuing site management have not been met.

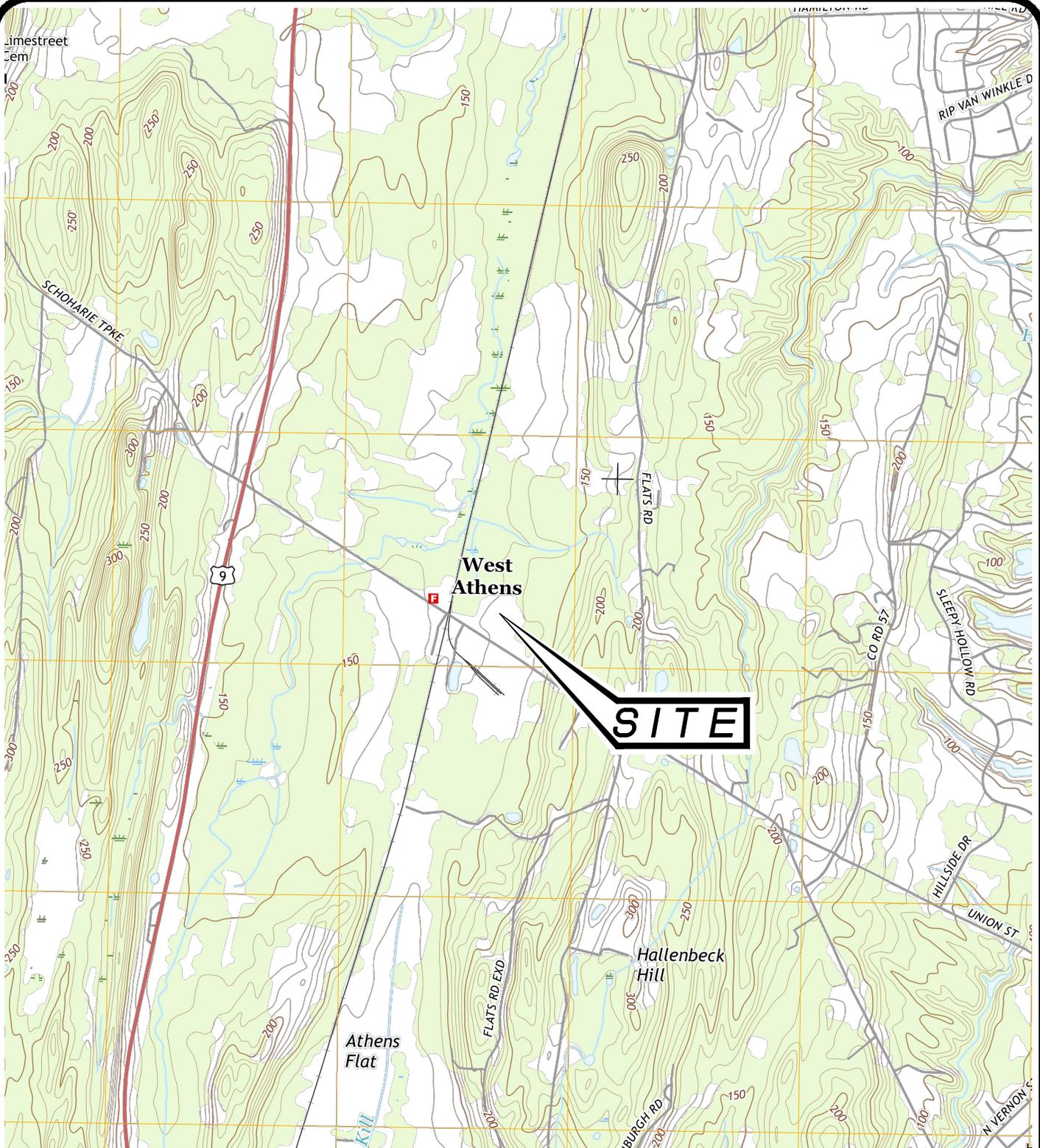
6.0 IC AND EC CERTIFICATION FORM

The NYSDEC Institutional and Engineering Control Certification Form for the Site is presented in Appendix A.

S:\Sterling\Projects\2014 Projects\Northeast Treaters of New York - Athens NY - 2014-08\Reports\Periodic Review Report\2021 PRR\Working Files\2021-10-12 Periodic Review Report.docx

FIGURES

S:\Drawings\2014-08 - Northeast Treaters of New York - Athens NY\2014-08107_F-1 - Site Location Map.dwg CAD 9/6/2019 3:06 PM



MAP REFERENCE: USGS HUDSON NORTH, NY 7.5 MINUTE QUADRANGLE, 2016

STERLING

Sterling Environmental Engineering, P.C.

24 Wade Road ♦ Latham, New York 12110

SITE LOCATION MAP
NORTHEAST TREATERS
SCHOHARIE TURNPIKE

TOWN OF ATHENS

GREENE CO., NEW YORK

PROJ. No.: 2014-08

DATE: 09/06/2019

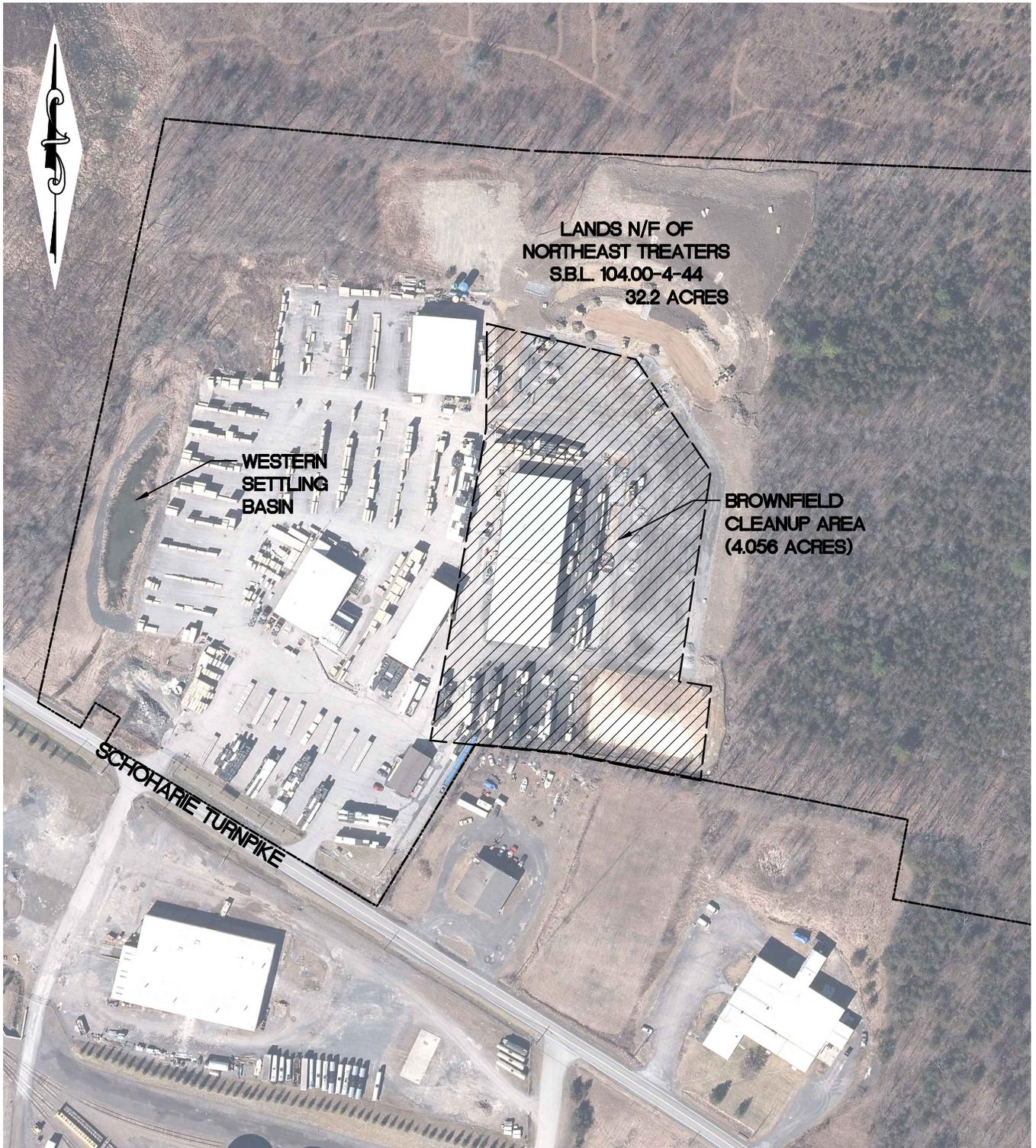
SCALE: 1" = 2,000'

DWG. NO. 2014-08107

FIGURE

1

S:\Drawings\2014-08 - Northeast Treaters of New York - Athens NY\2014-08047_SubjectPropMap (PRR).dwg MILLSPAUGH 8/29/2018 2:19 PM



LEGEND:

--- APPROXIMATE PROPERTY BOUNDARY



1 inch = 200 ft.

MAP REFERENCE: DISCOVER GIS DATA NY ORTHOIMAGERY, 2016.

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SUBJECT PROPERTY AND SITE MAP
NORTHEAST TREATERS
SCHOHARIE TURNPIKE

TOWN OF ATHENS

GREENE CO., N.Y.

PROJ. No.: 2014-08	DATE: 08/29/18	SCALE: 1" = 200'	DWG. NO. 2014-08047	FIGURE 2
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LEGEND:

- APPROXIMATE PROPERTY BOUNDARY
- ⊕ APPROXIMATE SAMPLE LOCATIONS

MAP REFERENCE: DISCOVER GIS DATA NY ORTHOIMAGERY, 2016.

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POST-REMEDATION MEDIA SAMPLING
SEDIMENT SAMPLE LOCATION MAP
NORTHEAST TREATERS
SCHOHARIE TURNPIKE

TOWN OF ATHENS

GREENE CO., N.Y.

APPENDIX A

**NYSDEC INSTITUTIONAL AND ENGINEERING
CONTROLS CERTIFICATION FORM**

Box 2A

YES NO

8. Has any new information revealed that assumptions made in the Qualitative Exposure Assessment regarding offsite contamination are no longer valid? YES NO

If you answered YES to question 8, include documentation or evidence that documentation has been previously submitted with this certification form.

9. Are the assumptions in the Qualitative Exposure Assessment still valid? YES NO
(The Qualitative Exposure Assessment must be certified every five years)

If you answered NO to question 9, the Periodic Review Report must include an updated Qualitative Exposure Assessment based on the new assumptions.

SITE NO. C420029**Box 3****Description of Institutional Controls**ParcelOwnerInstitutional Control**104.00-4-44**

Northeast Treaters of New York, LLC

Soil Management Plan
Site Management Plan

Landuse Restriction

Imposition of an institutional control in the form of an environmental easement for the controlled property which will require the remedial party or site owner to complete and submit to the Department a periodic certification of institutional and engineering controls in accordance with Part 375-1.8(h)(3); allow the use and development of the controlled property for commercial use as defined by Part 375-1.8(g), although land use is subject to local zoning laws; require compliance with the Department approved Site Management Plan.

Note controlled property includes the entire BCP site as well as "off-site" areas of the greater Northeast Treaters facility which have been impacted by site-related contamination, including the settling basin and the basin exit swale.

Box 4**Description of Engineering Controls**ParcelEngineering Control**104.00-4-44**

Cover System

Cover System: A site cover will be required to allow for commercial use of the site. The cover will consist either of the structures such as buildings, pavement, sidewalks comprising the site development or a soil cover in areas where the upper one foot of exposed surface soil will exceed the applicable soil cleanup objectives (SCOs). Where the soil cover is required it will be a minimum of one foot of soil placed over a demarcation layer, with the upper six inches of soil of sufficient quality to maintain a vegetative layer. Soil cover material, including any fill material brought to the site, will meet the SCOs for cover material as set forth in 6 NYCRR Part 375-6.7(d).

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 Engineering Control 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. For each Engineering control listed in Box 4, I certify by checking "YES" below that all of the following statements are true:

(a) The 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

Date

IC CERTIFICATIONS
SITE NO. C420029

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 Robert Collette at 796 Schoharie Turnpike, Athens, New York 12015,
print name print business address

am certifying as Northeast Treaters of NY, LLC (Owner or Remedial Party)

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



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

08/16/21
Date

EC CERTIFICATIONS

Box 7

Qualified Environmental Professional 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.

I Andrew Millspaugh at 24 Wade Road, Latham, NY 12110,
print name print business address

am certifying as a Qualified Environmental Professional for the Northeast Treaters of NY, LLC
(Owner or Remedial Party)



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

Station
(Required for PE)

8/17/2021

Date

Enclosure 3
Periodic Review Report (PRR) General Guidance

- I. Executive Summary: (1/2-page or less)
 - A. Provide a brief summary of site, nature and extent of contamination, and remedial history.
 - B. Effectiveness of the Remedial Program - Provide overall conclusions regarding:
 1. progress made during the reporting period toward meeting the remedial objectives for the site
 2. the ultimate ability of the remedial program to achieve the remedial objectives for the site.
 - C. Compliance
 1. Identify any areas of non-compliance regarding the major elements of the Site Management Plan (SMP, i.e., the Institutional/Engineering Control (IC/EC) Plan, the Monitoring Plan, and the Operation & Maintenance (O&M) Plan).
 2. Propose steps to be taken and a schedule to correct any areas of non-compliance.
 - D. Recommendations
 1. recommend whether any changes to the SMP are needed
 2. recommend any changes to the frequency for submittal of PRRs (increase, decrease)
 3. recommend whether the requirements for discontinuing site management have been met.

- II. Site Overview (one page or less)
 - A. Describe the site location, boundaries (figure), significant features, surrounding area, and the nature and extent of contamination prior to site remediation.
 - B. Describe the chronology of the main features of the remedial program for the site, the components of the selected remedy, cleanup goals, site closure criteria, and any significant changes to the selected remedy that have been made since remedy selection.

- III. Evaluate Remedy Performance, Effectiveness, and Protectiveness
Using tables, graphs, charts and bulleted text to the extent practicable, describe the effectiveness of the remedy in achieving the remedial goals for the site. Base findings, recommendations, and conclusions on objective data. Evaluations and should be presented simply and concisely.

- IV. IC/EC Plan Compliance Report (if applicable)
 - A. IC/EC Requirements and Compliance
 1. Describe each control, its objective, and how performance of the control is evaluated.
 2. Summarize the status of each goal (whether it is fully in place and its effectiveness).
 3. Corrective Measures: describe steps proposed to address any deficiencies in ICECs.
 4. Conclusions and recommendations for changes.
 - B. IC/EC Certification
 1. The certification must be complete (even if there are IC/EC deficiencies), and certified by the appropriate party as set forth in a Department-approved certification form(s).

- V. Monitoring Plan Compliance Report (if applicable)
 - A. Components of the Monitoring Plan (tabular presentations preferred) - Describe the requirements of the monitoring plan by media (i.e., soil, groundwater, sediment, etc.) and by any remedial technologies being used at the site.
 - B. Summary of Monitoring Completed During Reporting Period - Describe the monitoring tasks actually completed during this PRR reporting period. Tables and/or figures should be used to show all data.
 - C. Comparisons with Remedial Objectives - Compare the results of all monitoring with the remedial objectives for the site. Include trend analyses where possible.
 - D. Monitoring Deficiencies - Describe any ways in which monitoring did not fully comply with the monitoring plan.
 - E. Conclusions and Recommendations for Changes - Provide overall conclusions regarding the monitoring completed and the resulting evaluations regarding remedial effectiveness.

- VI. Operation & Maintenance (O&M) Plan Compliance Report (if applicable)
 - A. Components of O&M Plan - Describe the requirements of the O&M plan including required activities, frequencies, recordkeeping, etc.
 - B. Summary of O&M Completed During Reporting Period - Describe the O&M tasks actually completed during this PRR reporting period.
 - C. Evaluation of Remedial Systems - Based upon the results of the O&M activities completed, evaluated

the ability of each component of the remedy subject to O&M requirements to perform as designed/expected.

- D. O&M Deficiencies - Identify any deficiencies in complying with the O&M plan during this PRR reporting period.
- E. Conclusions and Recommendations for Improvements - Provide an overall conclusion regarding O&M for the site and identify any suggested improvements requiring changes in the O&M Plan.

VII. Overall PRR Conclusions and Recommendations

- A. Compliance with SMP - For each component of the SMP (i.e., IC/EC, monitoring, O&M), summarize;
 - 1. whether all requirements of each plan were met during the reporting period
 - 2. any requirements not met
 - 3. proposed plans and a schedule for coming into full compliance.
- B. Performance and Effectiveness of the Remedy - Based upon your evaluation of the components of the SMP, form conclusions about the performance of each component and the ability of the remedy to achieve the remedial objectives for the site.
- C. Future PRR Submittals
 - 1. Recommend, with supporting justification, whether the frequency of the submittal of PRRs should be changed (either increased or decreased).
 - 2. If the requirements for site closure have been achieved, contact the Departments Project Manager for the site to determine what, if any, additional documentation is needed to support a decision to discontinue site management.

VIII. Additional Guidance

Additional guidance regarding the preparation and submittal of an acceptable PRR can be obtained from the Departments Project Manager for the site.

APPENDIX B

SITE-WIDE INSPECTION FORM AND PHOTOGRAPHS

NORTHEAST TREATERS OF NEW YORK, LLC.
796 SCHOHARIE TURNPIKE, ATHENS, NY
SITE #C420029

SITE-WIDE INSPECTION FORM

Date: 8/5/2021

Inspected By: Timothy Clark, Paul Scholar

Weather Conditions: 70F, partly cloudy

Site Property Item	Condition		Remarks
	Acceptable	Not Acceptable	
1. Compliance with SMP/Environmental Easements	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
2. Condition of Protective Cover a. Asphalt b. Soil c. Concrete	<input checked="" type="checkbox"/>	<input type="checkbox"/>	a.
	<input checked="" type="checkbox"/>	<input type="checkbox"/>	b.
	<input checked="" type="checkbox"/>	<input type="checkbox"/>	c.
3. General Site Conditions at Time of Inspection	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4. Site Records Up-To-Date	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
5. Additional Comments/Notes: Small section of asphalt requires patching due to bollard repair work. See photo log.			

NORTHEAST TREATERS OF NEW YORK, LLC.
796 SCHOHARIE TURNPIKE, ATHENS, NY
SITE #C420029

SAMPLING SUMMARY

Date: 8/5/2021

Sampled By: Timothy Clark

Weather Conditions: 70F, partly cloudy

Sample ID	Collection Date & Time	Analysis	Physical Description of Materials (ie. Soil type, texture, moisture, color, odor,etc)	Comments
MP-U	10:10 am	Total Metals As, Cr	Brown sediment, silts and organic material, wet, earthy odor	DUP08052021 collected at MP-U
MP-M	10:20 am	Total Metals As, Cr	Brown sediment, silts and organic material, wet, earthy odor	None
MP-D	10:30 am	Total Metals As, Cr	Brown sediment, silts and organic material, wet, earthy odor	None
Overall Conditions: Sampling area was in acceptable condition.				
Additional Comments: None				



Photograph 1: Overview of eastern portion of protective asphalt cover in acceptable condition. Looking north.



Photograph 2: Overview of central portion of protective asphalt cover in acceptable condition. Looking northwest.



Photograph 3: Overview of southwestern portion of protective asphalt cover in acceptable condition. Looking west.



Photograph 4: Southwestern portion of protective asphalt cover and southern abatement berm soil cover in acceptable condition. Looking southwest.



Photograph 5: Southern abatement berm with soil cover in acceptable condition. Looking east.



Photograph 6: Southern abatement berm and perimeter drainage with soil cover in acceptable condition. Looking northeast.



Photograph 7: Eastern portion of protective asphalt cover in acceptable condition. Looking north.



Photograph 8: Northwestern portion of protective asphalt cover in acceptable condition. Looking northwest.



Photograph 9: Grade transition area between treatment process building and storage area in acceptable condition. Looking south.



Photograph 10: Northern portion of protective asphalt cover in acceptable conditions. Looking northwest.



Photograph 11: Northern portion of protective asphalt cover in acceptable condition. Looking north.



Photograph 12: Southern portion of protective asphalt cover in acceptable condition. Looking west.



Photograph 13: Grade transition area between treatment process building and storage area in acceptable condition. Looking north.



Photograph 14: Northern grade transition area in acceptable condition. Looking north.



Photograph 15: Central portion of protective asphalt cover in acceptable condition directly north of the treatment process building. Looking east.



Photograph 16: Southern portion of protective asphalt cover in acceptable condition directly east of the treatment process building. Looking south.



Photograph 17: Southwest perimeter of process building. Looking east.



Photograph 18: Representative concrete protective cover in acceptable condition within treatment process building.



Photograph 19: Representative concrete protective cover in acceptable condition within treatment process building.



Photograph 20: View of bollard repair with patched asphalt.

APPENDIX C

**POST-REMEDIATION MEDIA SAMPLING
ANALYTICAL RESULTS**



ANALYTICAL REPORT

Lab Number:	L2141870
Client:	Sterling Environmental Engineering 24 Wade Road Latham, NY 12110
ATTN:	Andrew Millspaugh
Phone:	(518) 456-4900
Project Name:	NORTHEAST TREATERS
Project Number:	2014-08
Report Date:	08/12/21

The original project report/data package is held by Alpha Analytical. This report/data package is paginated and should be reproduced only in its entirety. Alpha Analytical holds no responsibility for results and/or data that are not consistent with the original.

Certifications & Approvals: MA (M-MA086), NH NELAP (2064), CT (PH-0574), IL (200077), ME (MA00086), MD (348), NJ (MA935), NY (11148), NC (25700/666), PA (68-03671), RI (LAO00065), TX (T104704476), VT (VT-0935), VA (460195), USDA (Permit #P330-17-00196).

Eight Walkup Drive, Westborough, MA 01581-1019
508-898-9220 (Fax) 508-898-9193 800-624-9220 - www.alphalab.com



Project Name: NORTHEAST TREATERS
Project Number: 2014-08

Lab Number: L2141870
Report Date: 08/12/21

Alpha Sample ID	Client ID	Matrix	Sample Location	Collection Date/Time	Receive Date
L2141870-01	MP-D	SOIL	ATHENS, NY	08/05/21 10:10	08/05/21
L2141870-02	MP-M	SOIL	ATHENS, NY	08/05/21 10:20	08/05/21
L2141870-03	MP-U	SOIL	ATHENS, NY	08/05/21 10:30	08/05/21
L2141870-04	DUP08052021	SOIL	ATHENS, NY	08/05/21 00:00	08/05/21

Project Name: NORTHEAST TREATERS
Project Number: 2014-08

Lab Number: L2141870
Report Date: 08/12/21

Case Narrative

The samples were received in accordance with the Chain of Custody and no significant deviations were encountered during the preparation or analysis unless otherwise noted. Sample Receipt, Container Information, and the Chain of Custody are located at the back of the report.

Results contained within this report relate only to the samples submitted under this Alpha Lab Number and meet NELAP requirements for all NELAP accredited parameters unless otherwise noted in the following narrative. The data presented in this report is organized by parameter (i.e. VOC, SVOC, etc.). Sample specific Quality Control data (i.e. Surrogate Spike Recovery) is reported at the end of the target analyte list for each individual sample, followed by the Laboratory Batch Quality Control at the end of each parameter. Tentatively Identified Compounds (TICs), if requested, are reported for compounds identified to be present and are not part of the method/program Target Compound List, even if only a subset of the TCL are being reported. If a sample was re-analyzed or re-extracted due to a required quality control corrective action and if both sets of data are reported, the Laboratory ID of the re-analysis or re-extraction is designated with an "R" or "RE", respectively.

When multiple Batch Quality Control elements are reported (e.g. more than one LCS), the associated samples for each element are noted in the grey shaded header line of each data table. Any Laboratory Batch, Sample Specific % recovery or RPD value that is outside the listed Acceptance Criteria is bolded in the report. In reference to questions H (CAM) or 4 (RCP) when "NO" is checked, the performance criteria for CAM and RCP methods allow for some quality control failures to occur and still be within method compliance. In these instances, the specific failure is not narrated but noted in the associated QC Outlier Summary Report, located directly after the Case Narrative. QC information is also incorporated in the Data Usability Assessment table (Format 11) of our Data Merger tool, where it can be reviewed in conjunction with the sample result, associated regulatory criteria and any associated data usability implications.

Soil/sediments, solids and tissues are reported on a dry weight basis unless otherwise noted. Definitions of all data qualifiers and acronyms used in this report are provided in the Glossary located at the back of the report.

HOLD POLICY - For samples submitted on hold, Alpha's policy is to hold samples (with the exception of Air canisters) free of charge for 21 calendar days from the date the project is completed. After 21 calendar days, we will dispose of all samples submitted including those put on hold unless you have contacted your Alpha Project Manager and made arrangements for Alpha to continue to hold the samples. Air canisters will be disposed after 3 business days from the date the project is completed.

Please contact Project Management at 800-624-9220 with any questions.

Project Name: NORTHEAST TREATERS
Project Number: 2014-08

Lab Number: L2141870
Report Date: 08/12/21

Case Narrative (continued)

Report Submission

All non-detect (ND) or estimated concentrations (J-qualified) have been quantitated to the limit noted in the MDL column.

I, the undersigned, attest under the pains and penalties of perjury that, to the best of my knowledge and belief and based upon my personal inquiry of those responsible for providing the information contained in this analytical report, such information is accurate and complete. This certificate of analysis is not complete unless this page accompanies any and all pages of this report.

Authorized Signature:



Jennifer L Clements

Title: Technical Director/Representative

Date: 08/12/21

METALS

Project Name: NORTHEAST TREATERS**Lab Number:** L2141870**Project Number:** 2014-08**Report Date:** 08/12/21**SAMPLE RESULTS**

Lab ID: L2141870-01

Date Collected: 08/05/21 10:10

Client ID: MP-D

Date Received: 08/05/21

Sample Location: ATHENS, NY

Field Prep: Not Specified

Sample Depth:

Matrix: Soil

Percent Solids: 35%

Parameter	Result	Qualifier	Units	RL	MDL	Dilution Factor	Date Prepared	Date Analyzed	Prep Method	Analytical Method	Analyst
Total Metals - Mansfield Lab											
Arsenic, Total	22.2		mg/kg	1.07	0.223	1	08/07/21 06:50	08/09/21 17:41	EPA 3050B	1,6010D	SV
Chromium, Total	47.7		mg/kg	1.07	0.103	1	08/07/21 06:50	08/09/21 17:41	EPA 3050B	1,6010D	SV



Project Name: NORTHEAST TREATERS**Lab Number:** L2141870**Project Number:** 2014-08**Report Date:** 08/12/21**SAMPLE RESULTS**

Lab ID: L2141870-02

Date Collected: 08/05/21 10:20

Client ID: MP-M

Date Received: 08/05/21

Sample Location: ATHENS, NY

Field Prep: Not Specified

Sample Depth:

Matrix: Soil

Percent Solids: 62%

Parameter	Result	Qualifier	Units	RL	MDL	Dilution Factor	Date Prepared	Date Analyzed	Prep Method	Analytical Method	Analyst
Total Metals - Mansfield Lab											
Arsenic, Total	9.33		mg/kg	0.634	0.132	1	08/07/21 06:50	08/09/21 17:46	EPA 3050B	1,6010D	SV
Chromium, Total	20.2		mg/kg	0.634	0.061	1	08/07/21 06:50	08/09/21 17:46	EPA 3050B	1,6010D	SV



Project Name: NORTHEAST TREATERS**Lab Number:** L2141870**Project Number:** 2014-08**Report Date:** 08/12/21**SAMPLE RESULTS**

Lab ID: L2141870-03

Date Collected: 08/05/21 10:30

Client ID: MP-U

Date Received: 08/05/21

Sample Location: ATHENS, NY

Field Prep: Not Specified

Sample Depth:

Matrix: Soil

Percent Solids: 64%

Parameter	Result	Qualifier	Units	RL	MDL	Dilution Factor	Date Prepared	Date Analyzed	Prep Method	Analytical Method	Analyst
Total Metals - Mansfield Lab											
Arsenic, Total	7.30		mg/kg	0.597	0.124	1	08/07/21 06:50	08/09/21 17:51	EPA 3050B	1,6010D	SV
Chromium, Total	19.5		mg/kg	0.597	0.057	1	08/07/21 06:50	08/09/21 17:51	EPA 3050B	1,6010D	SV



Project Name: NORTHEAST TREATERS**Lab Number:** L2141870**Project Number:** 2014-08**Report Date:** 08/12/21**SAMPLE RESULTS**

Lab ID: L2141870-04

Date Collected: 08/05/21 00:00

Client ID: DUP08052021

Date Received: 08/05/21

Sample Location: ATHENS, NY

Field Prep: Not Specified

Sample Depth:

Matrix: Soil

Percent Solids: 60%

Parameter	Result	Qualifier	Units	RL	MDL	Dilution Factor	Date Prepared	Date Analyzed	Prep Method	Analytical Method	Analyst
Total Metals - Mansfield Lab											
Arsenic, Total	8.98		mg/kg	0.636	0.132	1	08/07/21 06:50	08/09/21 17:57	EPA 3050B	1,6010D	SV
Chromium, Total	21.5		mg/kg	0.636	0.061	1	08/07/21 06:50	08/09/21 17:57	EPA 3050B	1,6010D	SV



Project Name: NORTHEAST TREATERS

Lab Number: L2141870

Project Number: 2014-08

Report Date: 08/12/21

Method Blank Analysis Batch Quality Control

Parameter	Result Qualifier	Units	RL	MDL	Dilution Factor	Date Prepared	Date Analyzed	Analytical Method	Analyst
Total Metals - Mansfield Lab for sample(s): 01-04 Batch: WG1532345-1									
Arsenic, Total	ND	mg/kg	0.400	0.083	1	08/07/21 06:50	08/09/21 15:25	1,6010D	SV
Chromium, Total	ND	mg/kg	0.400	0.038	1	08/07/21 06:50	08/09/21 15:25	1,6010D	SV

Prep Information

Digestion Method: EPA 3050B

Lab Control Sample Analysis Batch Quality Control

Project Name: NORTHEAST TREATERS
Project Number: 2014-08

Lab Number: L2141870
Report Date: 08/12/21

Parameter	LCS %Recovery	Qual	LCSD %Recovery	Qual	%Recovery Limits	RPD	Qual	RPD Limits
Total Metals - Mansfield Lab Associated sample(s): 01-04 Batch: WG1532345-2 SRM Lot Number: D109-540								
Arsenic, Total	96		-		70-130	-		
Chromium, Total	96		-		70-130	-		

Matrix Spike Analysis
Batch Quality Control

Project Name: NORTHEAST TREATERS

Lab Number: L2141870

Project Number: 2014-08

Report Date: 08/12/21

Parameter	Native Sample	MS Added	MS Found	MS %Recovery	Qual	MSD Found	MSD %Recovery	Qual	Recovery Limits	RPD	Qual	RPD Limits
Total Metals - Mansfield Lab Associated sample(s): 01-04 QC Batch ID: WG1532345-3 QC Sample: L2134218-10 Client ID: MS Sample												
Arsenic, Total	3.10	10.7	11.8	81		-	-		75-125	-		20
Chromium, Total	11.2	17.8	25.6	81		-	-		75-125	-		20

Lab Duplicate Analysis

Batch Quality Control

Project Name: NORTHEAST TREATERS

Project Number: 2014-08

Lab Number: L2141870

Report Date: 08/12/21

Parameter	Native Sample	Duplicate Sample	Units	RPD	Qual	RPD Limits
Total Metals - Mansfield Lab Associated sample(s): 01-04 QC Batch ID: WG1532345-4 QC Sample: L2134218-10 Client ID: DUP Sample						
Arsenic, Total	3.10	2.52	mg/kg	21	Q	20
Chromium, Total	11.2	9.99	mg/kg	11		20

INORGANICS & MISCELLANEOUS

Project Name: NORTHEAST TREATERS

Project Number: 2014-08

Lab Number: L2141870

Report Date: 08/12/21

SAMPLE RESULTS

Lab ID: L2141870-01

Client ID: MP-D

Sample Location: ATHENS, NY

Date Collected: 08/05/21 10:10

Date Received: 08/05/21

Field Prep: Not Specified

Sample Depth:

Matrix: Soil

Parameter	Result	Qualifier	Units	RL	MDL	Dilution Factor	Date Prepared	Date Analyzed	Analytical Method	Analyst
General Chemistry - Westborough Lab										
Solids, Total	35.0		%	0.100	NA	1	-	08/06/21 07:53	121,2540G	RI



Project Name: NORTHEAST TREATERS

Project Number: 2014-08

Lab Number: L2141870

Report Date: 08/12/21

SAMPLE RESULTS

Lab ID: L2141870-02

Client ID: MP-M

Sample Location: ATHENS, NY

Date Collected: 08/05/21 10:20

Date Received: 08/05/21

Field Prep: Not Specified

Sample Depth:

Matrix: Soil

Parameter	Result	Qualifier	Units	RL	MDL	Dilution Factor	Date Prepared	Date Analyzed	Analytical Method	Analyst
General Chemistry - Westborough Lab										
Solids, Total	62.1		%	0.100	NA	1	-	08/06/21 07:53	121,2540G	RI



Project Name: NORTHEAST TREATERS**Project Number:** 2014-08**Lab Number:** L2141870**Report Date:** 08/12/21**SAMPLE RESULTS**

Lab ID: L2141870-03

Client ID: MP-U

Sample Location: ATHENS, NY

Date Collected: 08/05/21 10:30

Date Received: 08/05/21

Field Prep: Not Specified

Sample Depth:

Matrix: Soil

Parameter	Result	Qualifier	Units	RL	MDL	Dilution Factor	Date Prepared	Date Analyzed	Analytical Method	Analyst
General Chemistry - Westborough Lab										
Solids, Total	63.9		%	0.100	NA	1	-	08/06/21 07:53	121,2540G	RI



Project Name: NORTHEAST TREATERS

Project Number: 2014-08

Lab Number: L2141870

Report Date: 08/12/21

SAMPLE RESULTS

Lab ID: L2141870-04

Client ID: DUP08052021

Sample Location: ATHENS, NY

Date Collected: 08/05/21 00:00

Date Received: 08/05/21

Field Prep: Not Specified

Sample Depth:

Matrix: Soil

Parameter	Result	Qualifier	Units	RL	MDL	Dilution Factor	Date Prepared	Date Analyzed	Analytical Method	Analyst
General Chemistry - Westborough Lab										
Solids, Total	59.6		%	0.100	NA	1	-	08/06/21 07:53	121,2540G	RI



Lab Duplicate Analysis

Batch Quality Control

Project Name: NORTHEAST TREATERS

Project Number: 2014-08

Lab Number: L2141870

Report Date: 08/12/21

Parameter	Native Sample	Duplicate Sample	Units	RPD	Qual	RPD Limits
General Chemistry - Westborough Lab Associated sample(s): 01-04 QC Batch ID: WG1532170-1 QC Sample: L2142063-01 Client ID: DUP Sample						
Solids, Total	12.3	12.2	%	1		20

Project Name: NORTHEAST TREATERS
Project Number: 2014-08

Serial_No:08122111:29
Lab Number: L2141870
Report Date: 08/12/21

Sample Receipt and Container Information

Were project specific reporting limits specified?

YES

Cooler Information

Cooler **Custody Seal**
A Absent

Container Information

Container ID	Container Type	Cooler	Initial pH	Final pH	Temp deg C	Pres	Seal	Frozen Date/Time	Analysis(*)
L2141870-01A	Plastic 2oz unpreserved for TS	A	NA		4.7	Y	Absent		TS(7)
L2141870-01B	Metals Only-Glass 60mL/2oz unpreserved	A	NA		4.7	Y	Absent		AS-TI(180),CR-TI(180)
L2141870-02A	Plastic 2oz unpreserved for TS	A	NA		4.7	Y	Absent		TS(7)
L2141870-02B	Metals Only-Glass 60mL/2oz unpreserved	A	NA		4.7	Y	Absent		AS-TI(180),CR-TI(180)
L2141870-03A	Plastic 2oz unpreserved for TS	A	NA		4.7	Y	Absent		TS(7)
L2141870-03B	Metals Only-Glass 60mL/2oz unpreserved	A	NA		4.7	Y	Absent		AS-TI(180),CR-TI(180)
L2141870-04A	Plastic 2oz unpreserved for TS	A	NA		4.7	Y	Absent		TS(7)
L2141870-04B	Metals Only-Glass 60mL/2oz unpreserved	A	NA		4.7	Y	Absent		AS-TI(180),CR-TI(180)

Project Name: NORTHEAST TREATERS
Project Number: 2014-08

Lab Number: L2141870
Report Date: 08/12/21

GLOSSARY

Acronyms

DL	- Detection Limit: This value represents the level to which target analyte concentrations are reported as estimated values, when those target analyte concentrations are quantified below the limit of quantitation (LOQ). The DL includes any adjustments from dilutions, concentrations or moisture content, where applicable. (DoD report formats only.)
EDL	- Estimated Detection Limit: This value represents the level to which target analyte concentrations are reported as estimated values, when those target analyte concentrations are quantified below the reporting limit (RL). The EDL includes any adjustments from dilutions, concentrations or moisture content, where applicable. The use of EDLs is specific to the analysis of PAHs using Solid-Phase Microextraction (SPME).
EMPC	- Estimated Maximum Possible Concentration: The concentration that results from the signal present at the retention time of an analyte when the ions meet all of the identification criteria except the ion abundance ratio criteria. An EMPC is a worst-case estimate of the concentration.
EPA	- Environmental Protection Agency.
LCS	- Laboratory Control Sample: A sample matrix, free from the analytes of interest, spiked with verified known amounts of analytes or a material containing known and verified amounts of analytes.
LCSD	- Laboratory Control Sample Duplicate: Refer to LCS.
LFB	- Laboratory Fortified Blank: A sample matrix, free from the analytes of interest, spiked with verified known amounts of analytes or a material containing known and verified amounts of analytes.
LOD	- Limit of Detection: This value represents the level to which a target analyte can reliably be detected for a specific analyte in a specific matrix by a specific method. The LOD includes any adjustments from dilutions, concentrations or moisture content, where applicable. (DoD report formats only.)
LOQ	- Limit of Quantitation: The value at which an instrument can accurately measure an analyte at a specific concentration. The LOQ includes any adjustments from dilutions, concentrations or moisture content, where applicable. (DoD report formats only.) Limit of Quantitation: The value at which an instrument can accurately measure an analyte at a specific concentration. The LOQ includes any adjustments from dilutions, concentrations or moisture content, where applicable. (DoD report formats only.)
MDL	- Method Detection Limit: This value represents the level to which target analyte concentrations are reported as estimated values, when those target analyte concentrations are quantified below the reporting limit (RL). The MDL includes any adjustments from dilutions, concentrations or moisture content, where applicable.
MS	- Matrix Spike Sample: A sample prepared by adding a known mass of target analyte to a specified amount of matrix sample for which an independent estimate of target analyte concentration is available. For Method 332.0, the spike recovery is calculated using the native concentration, including estimated values.
MSD	- Matrix Spike Sample Duplicate: Refer to MS.
NA	- Not Applicable.
NC	- Not Calculated: Term is utilized when one or more of the results utilized in the calculation are non-detect at the parameter's reporting unit.
NDPA/DPA	- N-Nitrosodiphenylamine/Diphenylamine.
NI	- Not Ignitable.
NP	- Non-Plastic: Term is utilized for the analysis of Atterberg Limits in soil.
NR	- No Results: Term is utilized when 'No Target Compounds Requested' is reported for the analysis of Volatile or Semivolatile Organic TIC only requests.
RL	- Reporting Limit: The value at which an instrument can accurately measure an analyte at a specific concentration. The RL includes any adjustments from dilutions, concentrations or moisture content, where applicable.
RPD	- Relative Percent Difference: The results from matrix and/or matrix spike duplicates are primarily designed to assess the precision of analytical results in a given matrix and are expressed as relative percent difference (RPD). Values which are less than five times the reporting limit for any individual parameter are evaluated by utilizing the absolute difference between the values; although the RPD value will be provided in the report.
SRM	- Standard Reference Material: A reference sample of a known or certified value that is of the same or similar matrix as the associated field samples.
STLP	- Semi-dynamic Tank Leaching Procedure per EPA Method 1315.
TEF	- Toxic Equivalency Factors: The values assigned to each dioxin and furan to evaluate their toxicity relative to 2,3,7,8-TCDD.
TEQ	- Toxic Equivalent: The measure of a sample's toxicity derived by multiplying each dioxin and furan by its corresponding TEF and then summing the resulting values.
TIC	- Tentatively Identified Compound: A compound that has been identified to be present and is not part of the target compound list (TCL) for the method and/or program. All TICs are qualitatively identified and reported as estimated concentrations.

Report Format: DU Report with 'J' Qualifiers



Project Name: NORTHEAST TREATERS
Project Number: 2014-08

Lab Number: L2141870
Report Date: 08/12/21

Footnotes

- 1 - The reference for this analyte should be considered modified since this analyte is absent from the target analyte list of the original method.

Terms

Analytical Method: Both the document from which the method originates and the analytical reference method. (Example: EPA 8260B is shown as 1,8260B.) The codes for the reference method documents are provided in the References section of the Addendum.

Difference: With respect to Total Oxidizable Precursor (TOP) Assay analysis, the difference is defined as the Post-Treatment value minus the Pre-Treatment value.

Final pH: As it pertains to Sample Receipt & Container Information section of the report, Final pH reflects pH of container determined after adjustment at the laboratory, if applicable. If no adjustment required, value reflects Initial pH.

Frozen Date/Time: With respect to Volatile Organics in soil, Frozen Date/Time reflects the date/time at which associated Reagent Water-preserved vials were initially frozen. Note: If frozen date/time is beyond 48 hours from sample collection, value will be reflected in 'bold'.

Initial pH: As it pertains to Sample Receipt & Container Information section of the report, Initial pH reflects pH of container determined upon receipt, if applicable.

PAH Total: With respect to Alkylated PAH analyses, the 'PAHs, Total' result is defined as the summation of results for all or a subset of the following compounds: Naphthalene, C1-C4 Naphthalenes, 2-Methylnaphthalene, 1-Methylnaphthalene, Biphenyl, Acenaphthylene, Acenaphthene, Fluorene, C1-C3 Fluorenes, Phenanthrene, C1-C4 Phenanthrenes/Anthracenes, Anthracene, Fluoranthene, Pyrene, C1-C4 Fluoranthenes/Pyrenes, Benz(a)anthracene, Chrysene, C1-C4 Chrysenes, Benzo(b)fluoranthene, Benzo(j)+(k)fluoranthene, Benzo(e)pyrene, Benzo(a)pyrene, Perylene, Indeno(1,2,3-cd)pyrene, Dibenz(ah)+(ac)anthracene, Benzo(g,h,i)perylene. If a 'Total' result is requested, the results of its individual components will also be reported.

PFAS Total: With respect to PFAS analyses, the 'PFAS, Total (5)' result is defined as the summation of results for: PFHpA, PFHxS, PFOA, PFNA and PFOS. In addition, the 'PFAS, Total (6)' result is defined as the summation of results for: PFHpA, PFHxS, PFOA, PFNA, PFDA and PFOS. For MassDEP DW compliance analysis only, the 'PFAS, Total (6)' result is defined as the summation of results at or above the RL. Note: If a 'Total' result is requested, the results of its individual components will also be reported.

The target compound Chlordane (CAS No. 57-74-9) is reported for GC ECD analyses. Per EPA, this compound "refers to a mixture of chlordane isomers, other chlorinated hydrocarbons and numerous other components." (Reference: USEPA Toxicological Review of Chlordane, In Support of Summary Information on the Integrated Risk Information System (IRIS), December 1997.)

Total: With respect to Organic analyses, a 'Total' result is defined as the summation of results for individual isomers or Aroclors. If a 'Total' result is requested, the results of its individual components will also be reported. This is applicable to 'Total' results for methods 8260, 8081 and 8082.

Data Qualifiers

- A** - Spectra identified as "Aldol Condensates" are byproducts of the extraction/concentration procedures when acetone is introduced in the process.
- B** - The analyte was detected above the reporting limit in the associated method blank. Flag only applies to associated field samples that have detectable concentrations of the analyte at less than ten times (10x) the concentration found in the blank. For MCP-related projects, flag only applies to associated field samples that have detectable concentrations of the analyte at less than ten times (10x) the concentration found in the blank. For DOD-related projects, flag only applies to associated field samples that have detectable concentrations of the analyte at less than ten times (10x) the concentration found in the blank AND the analyte was detected above one-half the reporting limit (or above the reporting limit for common lab contaminants) in the associated method blank. For NJ-Air-related projects, flag only applies to associated field samples that have detectable concentrations of the analyte above the reporting limit. For NJ-related projects (excluding Air), flag only applies to associated field samples that have detectable concentrations of the analyte, which was detected above the reporting limit in the associated method blank or above five times the reporting limit for common lab contaminants (Phthalates, Acetone, Methylene Chloride, 2-Butanone).
- C** - Co-elution: The target analyte co-elutes with a known lab standard (i.e. surrogate, internal standards, etc.) for co-extracted analyses.
- D** - Concentration of analyte was quantified from diluted analysis. Flag only applies to field samples that have detectable concentrations of the analyte.
- E** - Concentration of analyte exceeds the range of the calibration curve and/or linear range of the instrument.
- F** - The ratio of quantifier ion response to qualifier ion response falls outside of the laboratory criteria. Results are considered to be an estimated maximum concentration.
- G** - The concentration may be biased high due to matrix interferences (i.e. co-elution) with non-target compound(s). The result should be considered estimated.
- H** - The analysis of pH was performed beyond the regulatory-required holding time of 15 minutes from the time of sample collection.
- I** - The lower value for the two columns has been reported due to obvious interference.
- J** - Estimated value. The Target analyte concentration is below the quantitation limit (RL), but above the Method Detection Limit (MDL) or Estimated Detection Limit (EDL) for SPME-related analyses. This represents an estimated concentration for Tentatively Identified Compounds (TICs).
- M** - Reporting Limit (RL) exceeds the MCP CAM Reporting Limit for this analyte.
- ND** - Not detected at the method detection limit (MDL) for the sample, or estimated detection limit (EDL) for SPME-related analyses.

Report Format: DU Report with 'J' Qualifiers



Project Name: NORTHEAST TREATERS
Project Number: 2014-08

Lab Number: L2141870
Report Date: 08/12/21

Data Qualifiers

- NJ** - Presumptive evidence of compound. This represents an estimated concentration for Tentatively Identified Compounds (TICs), where the identification is based on a mass spectral library search.
- P** - The RPD between the results for the two columns exceeds the method-specified criteria.
- Q** - The quality control sample exceeds the associated acceptance criteria. For DOD-related projects, LCS and/or Continuing Calibration Standard exceedences are also qualified on all associated sample results. Note: This flag is not applicable for matrix spike recoveries when the sample concentration is greater than 4x the spike added or for batch duplicate RPD when the sample concentrations are less than 5x the RL. (Metals only.)
- R** - Analytical results are from sample re-analysis.
- RE** - Analytical results are from sample re-extraction.
- S** - Analytical results are from modified screening analysis.

Project Name: NORTHEAST TREATERS
Project Number: 2014-08

Lab Number: L2141870
Report Date: 08/12/21

REFERENCES

- 1 Test Methods for Evaluating Solid Waste: Physical/Chemical Methods. EPA SW-846. Third Edition. Updates I - VI, 2018.
- 121 Standard Methods for the Examination of Water and Wastewater. APHA-AWWA-WEF. Standard Methods Online.

LIMITATION OF LIABILITIES

Alpha Analytical performs services with reasonable care and diligence normal to the analytical testing laboratory industry. In the event of an error, the sole and exclusive responsibility of Alpha Analytical shall be to re-perform the work at it's own expense. In no event shall Alpha Analytical be held liable for any incidental, consequential or special damages, including but not limited to, damages in any way connected with the use of, interpretation of, information or analysis provided by Alpha Analytical.

We strongly urge our clients to comply with EPA protocol regarding sample volume, preservation, cooling, containers, sampling procedures, holding time and splitting of samples in the field.



Certification Information

The following analytes are not included in our Primary NELAP Scope of Accreditation:

Westborough Facility

EPA 624/624.1: m/p-xylene, o-xylene, Naphthalene

EPA 625/625.1: alpha-Terpineol

EPA 8260C/8260D: NPW: 1,2,4,5-Tetramethylbenzene; 4-Ethyltoluene, Azobenzene; SCM: Iodomethane (methyl iodide), 1,2,4,5-Tetramethylbenzene; 4-Ethyltoluene.

EPA 8270D/8270E: NPW: Dimethylnaphthalene, 1,4-Diphenylhydrazine, alpha-Terpineol; SCM: Dimethylnaphthalene, 1,4-Diphenylhydrazine.

SM4500: NPW: Amenable Cyanide; SCM: Total Phosphorus, TKN, NO₂, NO₃.

Mansfield Facility

SM 2540D: TSS

EPA 8082A: NPW: PCB: 1, 5, 31, 87, 101, 110, 141, 151, 153, 180, 183, 187.

EPA TO-15: Halothane, 2,4,4-Trimethyl-2-pentene, 2,4,4-Trimethyl-1-pentene, Thiophene, 2-Methylthiophene,

3-Methylthiophene, 2-Ethylthiophene, 1,2,3-Trimethylbenzene, Indan, Indene, 1,2,4,5-Tetramethylbenzene, Benzothiophene, 1-Methylnaphthalene.

Biological Tissue Matrix: EPA 3050B

The following analytes are included in our Massachusetts DEP Scope of Accreditation

Westborough Facility:

Drinking Water

EPA 300.0: Chloride, Nitrate-N, Fluoride, Sulfate; **EPA 353.2:** Nitrate-N, Nitrite-N; **SM4500NO3-F:** Nitrate-N, Nitrite-N; **SM4500F-C, SM4500CN-CE,**

EPA 180.1, SM2130B, SM4500CI-D, SM2320B, SM2540C, SM4500H-B, SM4500NO2-B

EPA 332: Perchlorate; **EPA 524.2:** THMs and VOCs; **EPA 504.1:** EDB, DBCP.

Microbiology: **SM9215B; SM9223-P/A, SM9223B-Colilert-QT, SM9222D.**

Non-Potable Water

SM4500H,B, EPA 120.1, SM2510B, SM2540C, SM2320B, SM4500CL-E, SM4500F-BC, SM4500NH3-BH: Ammonia-N and Kjeldahl-N, **EPA 350.1:**

Ammonia-N, **LCHAT 10-107-06-1-B:** Ammonia-N, **EPA 351.1, SM4500NO3-F, EPA 353.2:** Nitrate-N, **SM4500P-E, SM4500P-B, E, SM4500SO4-E,**

SM5220D, EPA 410.4, SM5210B, SM5310C, SM4500CL-D, EPA 1664, EPA 420.1, SM4500-CN-CE, SM2540D, EPA 300: Chloride, Sulfate, Nitrate.

EPA 624.1: Volatile Halocarbons & Aromatics,

EPA 608.3: Chlordane, Toxaphene, Aldrin, alpha-BHC, beta-BHC, gamma-BHC, delta-BHC, Dieldrin, DDD, DDE, DDT, Endosulfan I, Endosulfan II,

Endosulfan sulfate, Endrin, Endrin Aldehyde, Heptachlor, Heptachlor Epoxide, PCBs

EPA 625.1: SVOC (Acid/Base/Neutral Extractables), **EPA 600/4-81-045:** PCB-Oil.

Microbiology: **SM9223B-Colilert-QT; Enterolert-QT, SM9221E, EPA 1600, EPA 1603, SM9222D.**

Mansfield Facility:

Drinking Water

EPA 200.7: Al, Ba, Cd, Cr, Cu, Fe, Mn, Ni, Na, Ag, Ca, Zn. **EPA 200.8:** Al, Sb, As, Ba, Be, Cd, Cr, Cu, Pb, Mn, Ni, Se, Ag, TL, Zn. **EPA 245.1 Hg.**

EPA 522, EPA 537.1.

Non-Potable Water

EPA 200.7: Al, Sb, As, Be, Cd, Ca, Cr, Co, Cu, Fe, Pb, Mg, Mn, Mo, Ni, K, Se, Ag, Na, Sr, TL, Ti, V, Zn.

EPA 200.8: Al, Sb, As, Be, Cd, Cr, Cu, Fe, Pb, Mn, Ni, K, Se, Ag, Na, TL, Zn.

EPA 245.1 Hg.

SM2340B

For a complete listing of analytes and methods, please contact your Alpha Project Manager.

APPENDIX D

OCTOBER 4, 2021 ADDITIONAL SAMPLING SUMMARY LETTER

STERLING
Sterling Environmental Engineering, P.C.

October 4, 2021

Mr. Joshua Haugh
New York State Department of Environmental Conservation
Region 4
1130 North Westcott Road
Schenectady, New York 12306

Subject: Northeast Treaters of New York, LLC
NYSDEC Site Number: C420029
STERLING File #2014-08

Dear Mr. Haugh,

In response to your request, Sterling Environmental Engineering, P.C. (STERLING) performed additional sediment sampling in the vicinity of the western settling basin discharge swale. Annual sampling performed on August 5, 2021, reported an arsenic concentration at monitoring location MP-D of 22.2 ppm, which exceeds the commercial and industrial soil cleanup objective of 16 ppm.

In coordination with the New York State Department of Environmental Conservation (NYSDEC), four additional samples were collected at the locations shown on the attached figure on September 7, 2021. Arsenic concentrations were reported ranging from 17.3 to 27.4 ppm. The detected arsenic concentrations are within the known range of arsenic reported in the Remedial Investigation Report and Final Engineering Report. As provided in the Site Management Plan, a closure plan will be prepared and implemented for the western settling basin and downgradient drainage swale when the facility permanently ceases its use. The SMP further provides that an Investigative Work Plan will be prepared at the time of closure to initiate settling basin closure and to delineate the lateral and vertical impact to soil and sediment located hydraulically downgradient of the settling basin.

Please contact me should you have any questions or comments.

Very truly yours,
STERLING ENVIRONMENTAL ENGINEERING, P.C.



Andrew M. Millspaugh, P.E.
Vice President

Andrew.Millspaugh@sterlingenvironmental.com

Email
Attachment

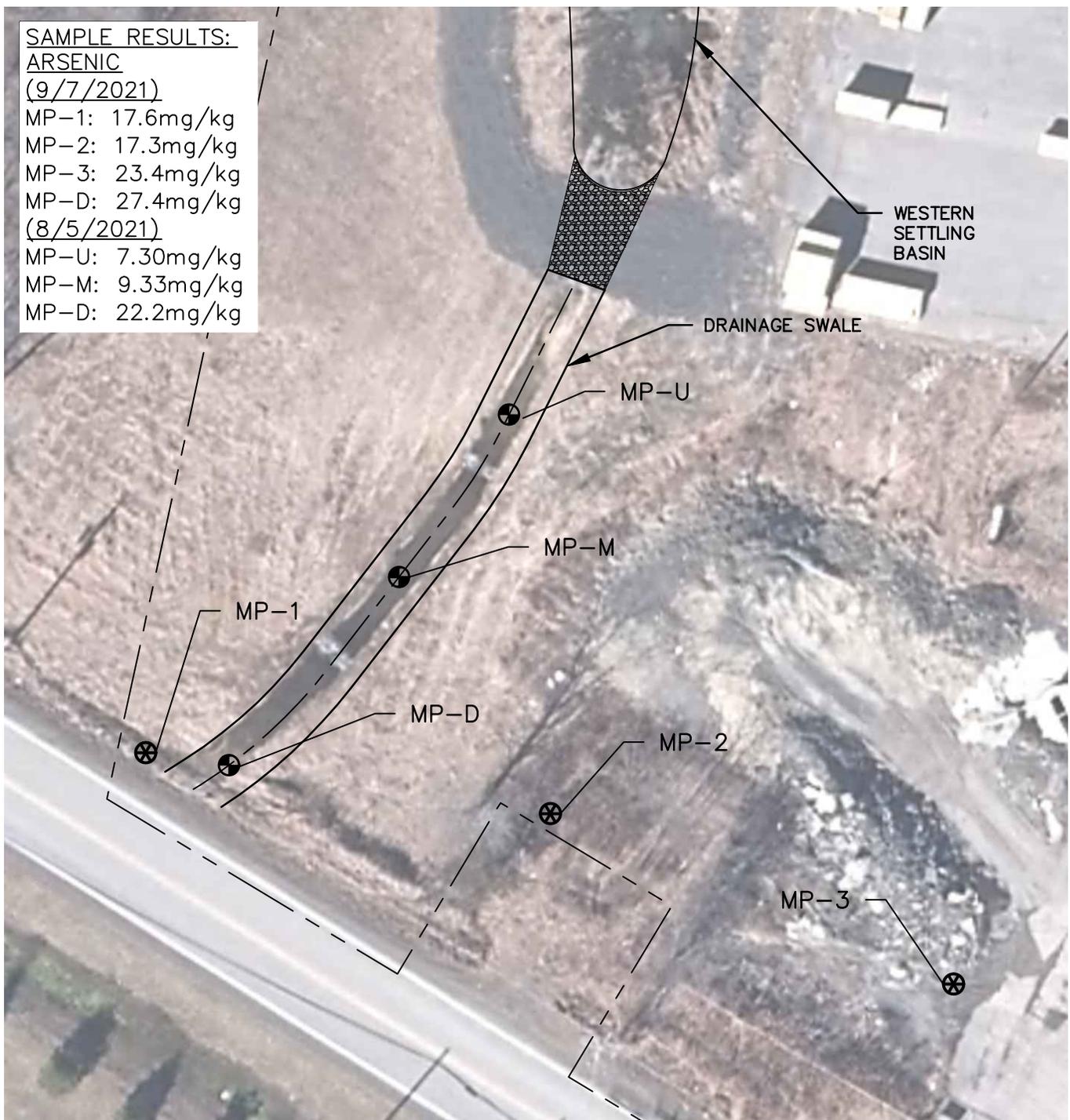
cc: Rob Collette, Northeast Treaters, Athens, NY (Email Only),

\\sevmde01\shared\sterling\Projects\2014 Projects\Northeast Treaters of New York - Athens NY - 2014-08\Correspondence\2021\2021-10-04_NET_Additional Sampling.docx

“Serving our clients and the environment since 1993”

S:\Sterling\Projects\2014 Projects\Northeast Treaters of New York - Athens NY - 2014-08\Drawings-Maps-Figures\ACAD\2014-08111 - 2021 Sediment Sample Locations.dwg CAD 9/20/2021 3:45 PM

SAMPLE RESULTS:
ARSENIC
(9/7/2021)
MP-1: 17.6mg/kg
MP-2: 17.3mg/kg
MP-3: 23.4mg/kg
MP-D: 27.4mg/kg
(8/5/2021)
MP-U: 7.30mg/kg
MP-M: 9.33mg/kg
MP-D: 22.2mg/kg



LEGEND:

- APPROXIMATE PROPERTY BOUNDARY
- ⊕ APPROXIMATE SAMPLE LOCATIONS, AUGUST 5, 2021
- ⊗ ADDITIONAL SAMPLE LOCATIONS, SEPTEMBER 7, 2021

MAP REFERENCE: DISCOVER GIS DATA NY ORTHOIMAGERY, 2016.

STERLING
Sterling Environmental Engineering, P.C.
24 Wade Road • Latham, New York 12110

POST-REMEDATION MEDIA SAMPLING
SEDIMENT SAMPLE LOCATION MAP
NORTHEAST TREATERS
SCHOHARIE TURNPIKE

TOWN OF ATHENS GREENE CO., N.Y.