

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Office of Environmental Quality, Region 4

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November 20, 2015

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

Re: Remedial Work Plan
Addendum Comments
Northeast Treaters, C420029

The NYSDEC and NYSDOH have reviewed your submitted Remedial Work Plan Addendum and have the following comments.

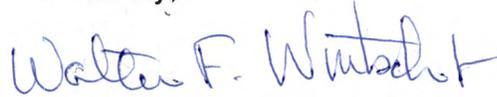
1. Section 2.2.2 – The statement “Northern stormwater line (contamination) demonstrate that the primary source of arsenic and chromium is from the storage area west of the site and not from the site itself” should be removed, as it does not reflect current understandings based on data presented and previous discussions with Northeast Treaters, NYSDEC and NYSDOH.
2. Section 2.4 – More specification is needed on the measures in place which prevent exposure to the sediment in the stormwater basin.
3. Section 5.3 – Concerning the statement “The facility’s stormwater basin effectively removes sediment from stormwater. Human exposure to basin sediment is remote because the basin contains static water year round.” The first portion of this statement should be removed as the contaminated sediment downstream demonstrates that the basin does not effectively remove sediment. The second sentence should have the word “static” removed.
4. Section 6.1.2 – A surface sample (0-2”) adjacent to the most down gradient edge of excavation is required.
5. Section 6.1.2 –Concerning post-excavation confirmation sampling; the sampling results should be compared to unrestricted and site-specific soil clean-up objectives. Additionally, hexavalent and trivalent chromium should be included in confirmation sampling analysis.



Department of
Environmental
Conservation

The Remedial Work Plan Addendum is approved contingent on these changes.
Please incorporate these changes and resubmit the Addendum.
Please feel free to contact me if you have any questions.

Sincerely,



Walter F. Wintsch, Jr.
Engineering Geologist 2
NYSDEC, Region 4

ecc Vedran Cirkovic, Sterling
Tom Johnson, Sterling
Brad Wenskoski, NYSDOH
Scarlett McLaughlin, NYSDOH
Kevin Young, Young and Sommers
Jim Quinn, NYSDEC

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