Professional Service Industries, Inc.
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October 21, 2022

New York State Department of Environmental Protection, Remedial Bureau E
625 Broadway, 12th Floor
Albany, New York 12233-7017

Attention: Mr. Brianna Scharf
brianna.scharf@dec.ny.gov

Re: Corrective Measures Plan
Former Scolite Site
2 Madison Street
Troy, New York
Site No. E442037

Dear Ms. Scharf:

Professional Service Industries, Inc. (an Intertek Company) is submitting this Corrective Measures Plan on behalf of the City of Troy, New York to repair an isolated area of the cover system that was recently damaged. This Corrective Measures Plan has been prepared in accordance with the 2019 Site Management Plan (SMP) for the former Scolite Site, Site No. E442037 located at 2 Madison Street in Troy, New York. The site was identified for remediation by the New York State Department of Environmental Conservation (NYSDEC), in consultation with the New York State Department of Health (NYSDOH) in March 2011 due to the presence of hazardous substances that posed potential threats to human health and/or the environment. A Site Location Map is included as **Figure 1.**

COVER SYSTEM BREACH

On July 7, 2022, the NYSDEC was notified that the existing cover system was damaged during the removal of a large steel electrical generator system (flywheel) that was used in one of the former onsite buildings. The cover system is protective of human exposure to site soils and consists of filter fabric placed on top of the impacted soil which is overlain by 12" of No. 2 crushed stone. There are areas of the site that are covered by concrete slabs which are remnants of the razed onsite structures. The concrete slabs serve as a protective cover system over impacted soil where they are located. The locations of the protective onsite crushed stone and concrete slab cover systems are depicted on the Site Aerial Plan attached as **Figure 2**.

On July 7, 2022, the flywheel was removed by contractors on behalf of a local museum. The City of Troy approved the removal of the flywheel contingent upon proper notification to the City in accordance with SMP. The City of Troy became aware of the removal of the flywheel after it had been loaded onto the truck.

The removal required a large crane to lift the flywheel structure from the mounts and place it on a flatbed truck for transport to the museum. It appears that vegetative growth which had taken root through the crushed stone/fabric layer was pushed to the side to accommodate the crane. This activity caused the root structure below the fabric to pull the fabric to the surface, thus damaging it and disturbing the soils. Due to the weight of the crane, small pieces of the concrete cover system were broken away where it adjoined the crushed stone areas. The area of cover system damage is approximately 30 feet by 30 feet by one feet deep. In addition, by removing the flywheel structure, a void was created that will require management as described below. The location of the former flywheel and damaged cover system area are depicted on the Site Plan attached as **Figure 2.** Photographs of both areas are attached.

PURPOSE OF CORRECTIVE MEASURES PLAN

The purpose of the Corrective Measures Plan is to identify, develop, and implement appropriate measures to repair the breach of the system cover in accordance with the SMP in order to protect human health and the environment.

GOALS AND STRATEGIES OF THE CORRECTIVE MEASURES PLAN

Below is the general outline and strategies that will be used to successfully repair the breach to the cover system in conformance with the SMP.

- Provide the NYSDEC with 15-Day Notification of Intrusive activities and 7 day notification of the scheduled field event.
- Pre-mark the excavation areas for digsafe. Notify the NYSDEC and DIG SAFELY NEW YORK one week prior to the start date of excavation work.
- Provide the NYSDEC with the facility name and location of imported No. 2 crushed stone for approval.
- Excavate the 30’ x 30’ breach area down to approximately 12” below grade.
- Screen soil and ambient air for organic vapors with an organic vapor analyzer equipped with a Photoionization Detector (OVA-PID) during soil excavation activities.
- Manage impacted soil on polyethylene sheeting (cover soil pile while not active). Remove filter fabric and stage separately on polyethylene sheeting.
- Conduct Community Air Monitoring Program (CAMP) monitoring of particulates and volatile organic compounds (VOCs).
- Place filter fabric a minimum of 12” below surface grade and overlap at grade. Place a minimum of 12” of No. crushed stone on top of filter fabric. Cut overlap of filter fabric at grade.
- Reuse all impacted soil as backfill. Residual soil will be placed in the void left by the flywheel removal. If export is required, follow proper disposal requirements.

NYSDEC 15-DAY NOTIFICATION

PSI will notify Ms. Brianna Scharf of the NYSDEC a minimum of 15-days prior to commencing with excavation work.

UTILITY CLEARANCE/HEALTH AND SAFETY PLAN

It will be the responsibility of US Ecology to pre-mark the excavation area and contact Dig Safe New York to obtain underground utility clearances for the excavation area in accordance with New York State Code Rule 753.

PSI will prepare a site-specific Health and Safety Plan (HASP) to include soil excavation activities and potential exposure scenarios to inform workers of the current site conditions and procedures to complete and execute the Corrective Action.

COVER SYSTEM REPAIR

US Ecology will use a mini backhoe or equivalent to clear the approximate 30'x30' breach area of fallen trees and place to the side. Soil will be removed from any root matter and placed on polyethylene sheeting. The trees will be placed to the side and managed by the City of Troy. The US Ecology will excavate to minimum of one (1) foot below grade. Groundwater is not expected to be encountered. The excavated soil will be stockpiled on 6-millimeter thick, or greater, polyethylene sheeting. Remove filter fabric and stage separately on polyethylene sheeting. Place filter fabric a minimum of 12" below surface grade and overlap at grade. Once fabric is in place US Ecology will proceed by backfilling with clean No. 2 stone. Cut overlap of filter fabric at grade. All excess soils (minimal) will be placed in the fly well void area to a maximum of 12" below grade. Place filter fabric in flywheel void area, overlaps at grade, fill with No. 2 crushed stone to grade and cut excess fabric at grade.

COMMUNITY AIR MONITORING PLAN (CAMP)

Particulate Monitoring

PSI will set up two (2) DustTrak air monitoring stations during excavation activities. One will be placed in close proximity to the excavation area and the second station will be placed halfway between the excavation area and Erie Boulevard. Airborne particulate matter (PM-10) concentrations will be monitored continuously and will not exceed the EWP designated threshold value of 0.100 mg/m3 above the background particulate level, based on a 15-minute time weighted average (TWA). If exceeded, dust suppression techniques such as water for wetting will be required so that the downwind threshold value of 0.150 mg/m3 above the above the upwind particulate level is not exceeded. If exceeded based on a 5-minute time weighted TWA, excavation activities will be stopped, and re-evaluation of the intrusive

activities will be initiated. Work can resume provided that dust suppression measures and/or other engineering controls are successful in reducing the downwind PM-10 concentration to within 0.150 mg/m3 of background and preventing significant visible dust migration. If exceeded, PSI would notify the County and corrective measures would be taken to reduce particulate concentrations.

Volatile Organic Compounds (VOC) Monitoring

VOC Monitoring, Response Levels, and Actions Volatile organic compounds (VOCs) must be monitored at the downwind perimeter of the immediate work area (i.e., the exclusion zone) on a continuous basis or as otherwise specified. Upwind concentrations should be measured at the start of each workday and periodically thereafter to establish background conditions, particularly if wind direction changes. The monitoring work should be performed using equipment appropriate to measure the types of contaminants known or suspected to be present. The equipment should be calibrated at least daily for the contaminant(s) of concern or for an appropriate surrogate. The equipment should be capable of calculating 15-minute running average concentrations, which will be compared to the levels specified below.

If the ambient air concentration of total organic vapors at the downwind perimeter of the work area or exclusion zone exceeds 5 parts per million (ppm) above background for the 15-minute average, work activities must be temporarily halted and monitoring continued. If the total organic vapor level readily decreases (per instantaneous readings) below 5 ppm over background, work activities can resume with continued monitoring.2. If total organic vapor levels at the downwind perimeter of the work area or exclusion zone persist at levels in excess of 5 ppm over background but less than 25 ppm, work activities must be halted, the source of vapors identified, corrective actions taken to abate emissions and monitoring continued. After these steps, work activities can resume provided that the total organic vapor level 200 feet downwind of the exclusion zone or half the distance to the nearest potential receptor or residential/commercial structure, whichever is less but in no case less than 20 feet, is below 5 ppm over background for the 15-minute average. If the organic vapor level is above 25 ppm at the perimeter of the work area, activities must be shutdown.

Soil Screening

During excavation activities, PSI will perform visual and olfactory assessment of the excavated soil for indicators of environmental impact. Soil will also be field screened utilizing an organic vapor analyzer (OVA) equipped with a photoionization detector (OVA-PID). All soil will be placed on polyethylene sheeting and reused in the area it was excavated from. If residual soil remains, the excess soil will be placed in the flywheel void area as described above. All Pid readings will be recorded as field documentation. No soil will be removed from the site.

SCHEDULE OF SITE ACTIVITIES

The tentative schedule for Site activities is as follows:

- Submit Corrective Measures Plan to NYSDEC — Week of October 17, 2022
- NYSDEC 15-Day Notification — Within 2 weeks of NYSDEC Work Plan Approval
- Utility Clearance — Within 2 weeks of NYSDEC Work Plan Approval
- Excavation/Cover System Repair — 2-4 Weeks of NYSDEC Plan Approval
- Excavation Start Date Notice to NYSDEC — A minimum of 7 days prior to start date
- Soil Removal (if necessary) — To Be Determined
- All documentation will be summarized in the Periodic Review Report. The excavation and replacement of the filter fabric and stone is estimated to take approximately 1-2 days

APPROVAL OF CORRECTIVE MEASURES PLAN

Following the review of this Corrective Measure Plan, NYSDEC comment period and subsequent approval of the plan, PSI and US Ecology will begin the repair of the cover system as described above.

Should you have any questions please contact us at 518-377-9841.

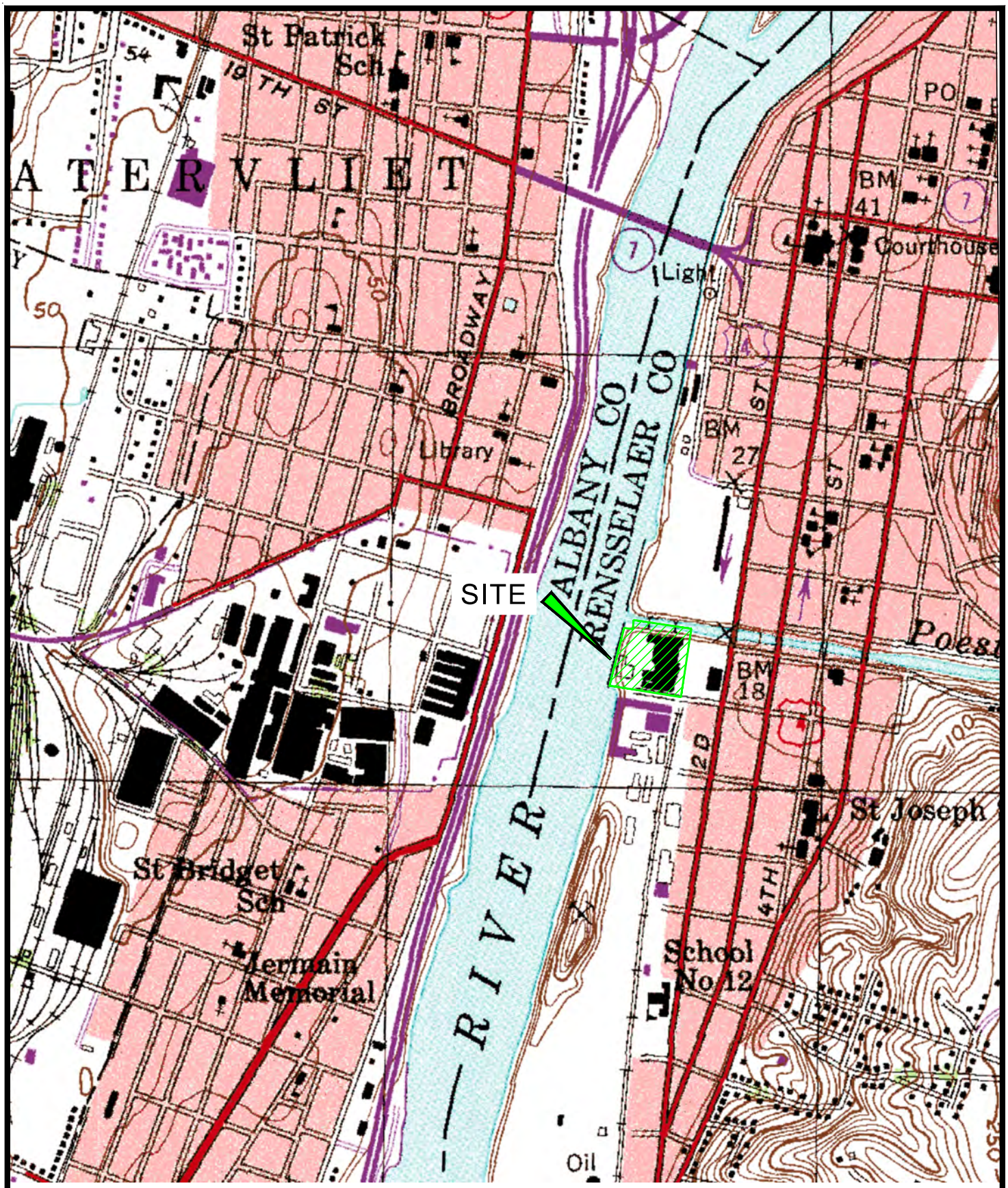
Respectfully Submitted,
Intertek/PSI

Thomas Rankin, PG, CPG
Sr. Geologist/Project Manager

Michael D. Monteith, PG (IL), RG (MO), CPG
Chief Scientist/Principal Consultant

Attachments:

Figure 1
Figure 2
Photographs



TOPOGRAPHIC IMAGE:
U.S.G.S. TROY SOUTH QUADRANGLE, NY
7.5 MINUTE SERIES
1953 – PHOTOREVISED 1980

0 1,000'
GRAPHIC SCALE
ALL LOCATIONS ARE APPROXIMATE

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Environmental Services
104 Erie Boulevard, Suite 1
Schenectady, NY 12305
(518) 377-9841 (518) 377-9847 fax

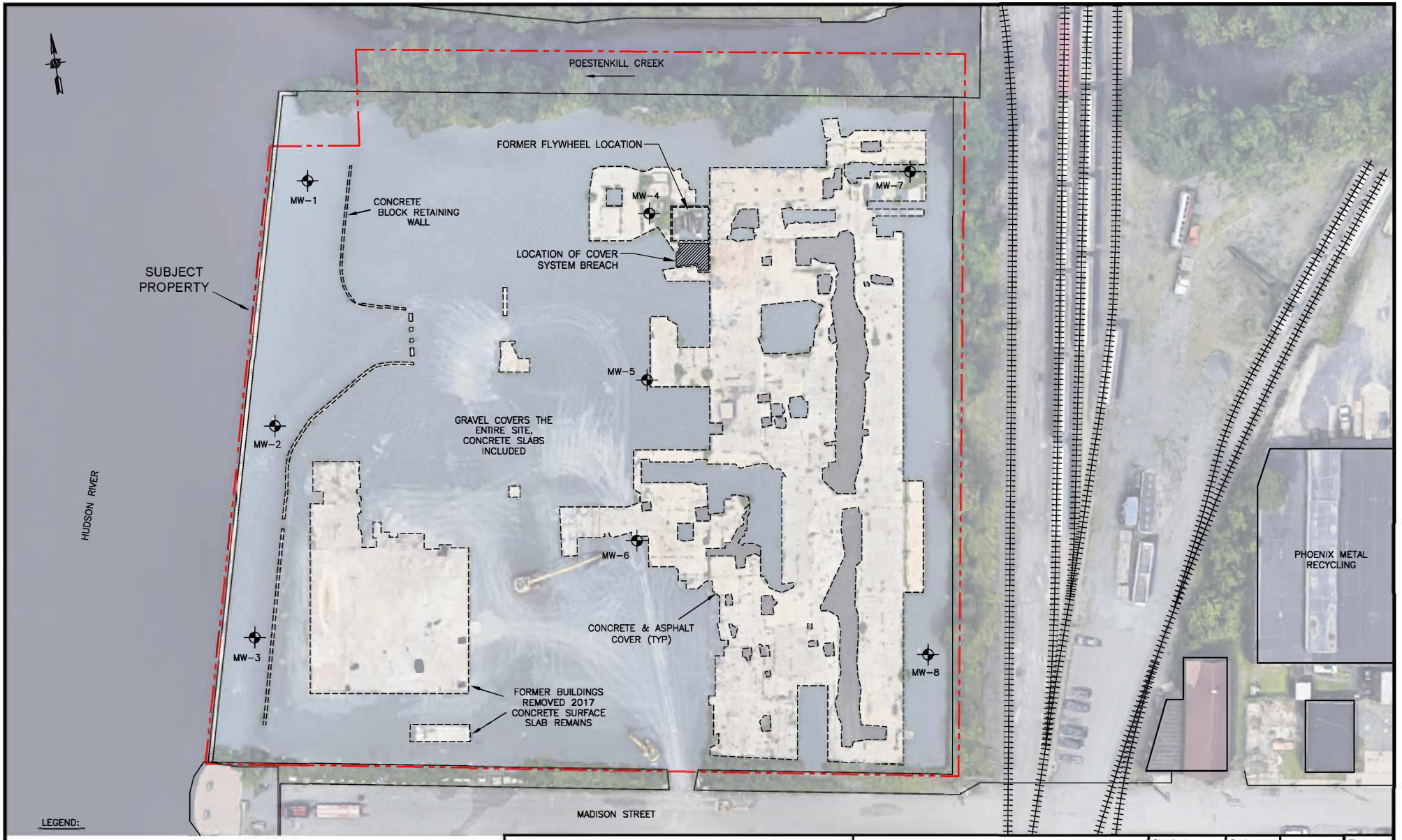
Site Map - USGS Topographic

2 Madison Street
Troy, New York 12180

Checked:	Scale:	Date:	Figure:
T. Rankin	1" = 1,000'	Apr 22, 2021	1

Drawn: C. Moran
08214317-1 Fig 1.dwg

Project Number: 08214317



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Site Plan Aerial

2 Madison Street
Troy, New York 12180

Checked:	Scale:	Date:	Figure:
T. Rankin	1" = 60'	Oct. 14, 2022	2

Drawn: C. Moran
08214673-1.dwg
Fig 2

Project Number: 08214673

View of breach area looking north. Note trees that were pushed over.

Eastern edge of breach area looking south. Damaged concrete.

Damaged area in background below brown (dead trees).

Flywheel void area.