

# NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Division of Environmental Remediation, Remedial Bureau D

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March 15, 2021

Mr. Paul Johnson  
Operations Project Manager  
Atlantic Richfield Company  
Remediation Management  
150 W. Warrenville Road  
MC 200 1E  
Naperville, IL 60563

Re: Basis of Design Submittal for Old Marina/Kinnally Cove in OU-2  
Former Anaconda Plant (a.k.a. Harbor at Hastings Site) Site No. 3-60-022  
Hastings-On-Hudson, New York

Dear Mr. Johnson:

The Department of Environmental Conservation has reviewed the draft Basis of Design (BOD) for Old Marina/Kinnally Cove in OU-2 dated December 22, 2020 for the Harbor at Hastings site. The BOD report for the Old Marina and Kinnally Cove includes a summary of assumptions for design of dredging and restoration of the Old Marina and Kinnally Cove areas. The extent of the Old Marina and Kinnally Cove remediation area was determined based on supplemental pre-design investigation reports generated between 2018 and 2019. The Department has the following comments:

1. General Comment – Please provide the draft Turbidity, Mitigation and Control Plan and the Water Quality and Monitoring Plan to the Department as soon as possible for review prior to the 95% Final Design Report submittal. While developing the monitoring plan please note that the Department uses Total Suspended Solids (TSS), polychlorinated biphenyl (PCB) and metals monitoring, in addition to turbidity, for determining compliance.
2. Section Outcome of May 15, 2020 Meeting, last bullet - When dredging within the turbidity curtain, the practice of draining over the water column would need to be evaluated based on results of water quality monitoring outside the curtain.
3. Section 2.2 Identification of Existing Structures - Please notify the Department when preliminary evaluation of the submerged structures is scheduled to begin.
4. Section 2.3 Identification and Potential Removal of Existing Debris – If temporary dewatering and removal of sediment in the dry is a possibility, then details of the cofferdam and/or berm need to be provided to the Department prior to the 95% Final Design Report.
5. Section 2.7.2.1 – Removal of Sediment in the Wet – Provide a site plan with the area showing where the 3H:1V slope cannot be achieved and explain why those areas need a 2H:1V slope.



Department of  
Environmental  
Conservation

6. Section 2.7.2.3 Beneficial Use Considerations and Section 2.8 Dredged Sediment and Debris Material Handling Plan – The Department has reviewed the information provided in the Beneficial Use Determination request provided by ARCO on March 11, 2020 and revised on August 14, 2020. The Department will not be issuing a BUD for the reuse of these materials as backfill on the site. However, the Department approves the materials described in the BUD request to be consolidated within the OU-1 remedial boundary of the site and placed beneath a demarcation layer. This material will still need to be evaluated for constructability.
7. Section 2.7.4 Backfilling Plan Assumptions – Backfilling should be to within 1 foot of pre-dredge depths. This requirement will not change unless the Village specifically requests less backfill in the Kinnally Cove area and provides their reasoning.
8. Appendix D – Beneficial Use Evaluation Memorandum, Tables – There is an error that occurred with the tables when the pdf files were merged. The error left the tables unreadable.

Taking into consideration the comments above, please finalize the BOD report and submit for review. If you have any questions, please feel free to contact me at (518)402-9821.

Sincerely,



Jess LaClair  
Project Manager

ec: Mayor Armacost  
Village Manager  
Trustee Fleisig  
S. Edwards, DEC-DER  
J. Armitage, DEC-DER  
A. Guglielmi, DEC-OGC  
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