



August 1, 2017

Reference No. 080335

Sent Via Email and First Class Mail

Mr. Al Carlacci
Division of Air Resources
NYSDEC – Region 9
270 Michigan Avenue
Buffalo, NY 14203-2999

Dear Mr. Carlacci:

**Re: Supplemental Discussion: July 2017 Air Quality Modeling Report
CWM Chemical Services, LLC – Model City, NY**

On behalf of CWM Chemical Services, LLC (CWM), GHD has prepared this letter that supplements the Air Quality Modeling Report that was submitted on July 11, 2017. The purpose of this letter is to provide some minor clarifications based on questions posed by the New York State Department of Environmental Conservation (NYSDEC).

The following two paragraphs provide additional discussion and expand upon the first paragraph of Section 3.1:

PCB data included in Attachment 4 of the Emissions Inventory (GHD, May 2017) indicate that the leachate from RMU-1 contains Aroclors 1242 and 1260 based on one leachate sample from a set of samples collected in 2012. A review of multiple sample results for years following 2012 indicates that the leachate from RMU-1 contains Aroclor 1242 almost exclusively. However, to be conservative, the PCB emissions from the standpipes were calculated using the 2012 sample that contained both Aroclor 1242 and 1260. Since this sample showed significantly more Aroclor 1260 than any subsequent sample, the PCB emissions calculated for the standpipes conservatively address the potential emissions of Aroclor 1260 from RMU-1. Accordingly, emissions from barometric pumping and cover diffusion were based on Aroclor 1242.

Potential PCB emissions for RMU-2 were based on the breakdown of the three Aroclors as discussed in the first paragraph of Section 3.1 of the Air Quality Modeling Report (GHD, July 2017). This method was chosen so as to conservatively evaluate the potential impact of RMU-2. Since Aroclors 1254 and 1260 have a much lower AGC than Aroclor 1242, this method was considered to be more conservative than assuming that all PCBs received would be Aroclor 1242 like RMU-1. Further, CWM will be tracking PCBs in bulk waste actually placed in RMU-2 in order to demonstrate compliance with permit conditions CWM anticipates NYSDEC will be writing into the Air State Facility Permit.



If you have any questions, or if you would like additional information, please feel free to contact the undersigned at (716) 297-6150 at your convenience.

Sincerely,

GHD

A handwritten signature in black ink that reads "S.D. Wilsey". The signature is written in a cursive, flowing style.

Steven D. Wilsey

SDW/cs/1

cc: Bryan Szalda – GHD
 Jill Banaszak – CWM
 Jonathan Rizzo (CWM)
 Mike Mahar (CWM)
 Mike Emery (NYSDEC)