



C&S Companies  
141 Elm Street, Suite 100  
Buffalo NY 14203  
p: (716) 847-1630  
f: (716) 847-1454  
www.cscos.com

December 1, 2014

Ms. Jane O'Connell  
Chief, Superfund and Brownfield Cleanup Section  
New York State Department of Environmental Conservation  
47-40 21st Street, Long Island City, NY 11101

*Re: Arthur Kill Lead Remediation NYSDEC Site #243039  
IRM Work Plan Modification*

Dear Ms. O'Connell

In 2014, the NYSDEC approved the *Site Characterization and Interim Remedial Measures Work Plan, Arthur Kill Correction Facility Firing Range, NYSDEC Site #243039*, dated June 2014 ("Work Plan"). Section 4: Soil/Materials Management Plan of the Work Plan established the proposed methods for material excavation and handling prior to off-site disposal.

Based on the seasonal conditions, site stockpiling near the old firing range as originally proposed no longer appears to be a practical or viable option. Stockpiling, loading and trucking in the remediation area needs to be relocated to prevent severe rutting and soil disturbance within the work area. C&S and EnviroTrac are recommending that excavated soils be internally transported to a fenced asphalt lot within the defined work area and temporarily staged for offsite disposal (See attached Figure). The benefits of this area include:

- Asphalt cover reducing the potential of cross contamination;
- Reduced heavy vehicular traffic on unpaved areas
- Reduced rutting and additional soil disturbance in the remediation area (i.e. "pumped" wet clay).

C&S has worked with the environmental contractor, EnviroTrac, to develop the following modifications to the Work Plan:

- Direct load and internally truck all materials leaving the site to the fenced storage area and temporarily stage for offsite disposal. Direct load area must be kept free of contaminated material to prevent tracking out of remediation area.
- All materials staged here will be stockpiled on, and covered with plastic sheeting. The sheeting shall be bermed to prevent potential of rain and sediments from leaking onto adjacent areas. Down slope storm drain inlets

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near the stockpile areas will be sealed until stockpiles have been removed and area has been cleaned.

- Stockpile will be inspected at the beginning and end of each work day to ensure that materials have not left the containment. Should materials be observed outside the bermed areas, they will be immediately cleaned and the containment will be repaired.
- Water collecting in the bermed area will be containerized and sampled for proper disposal.
- Following completion of the final removal of the stockpile area, the asphalt will be scraped clean and the area will be pressure washed to remove residual soils. Wash water will be collected and containerized for disposal.
- During stockpile construction and loading, a particulate air monitoring station will be placed downwind of the stockpile area operations.

Please accept this letter as official modification to the Work Plan.

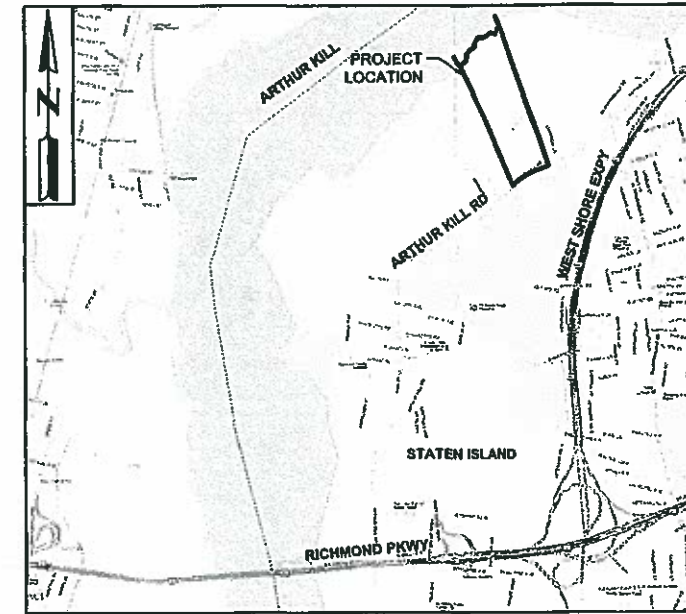
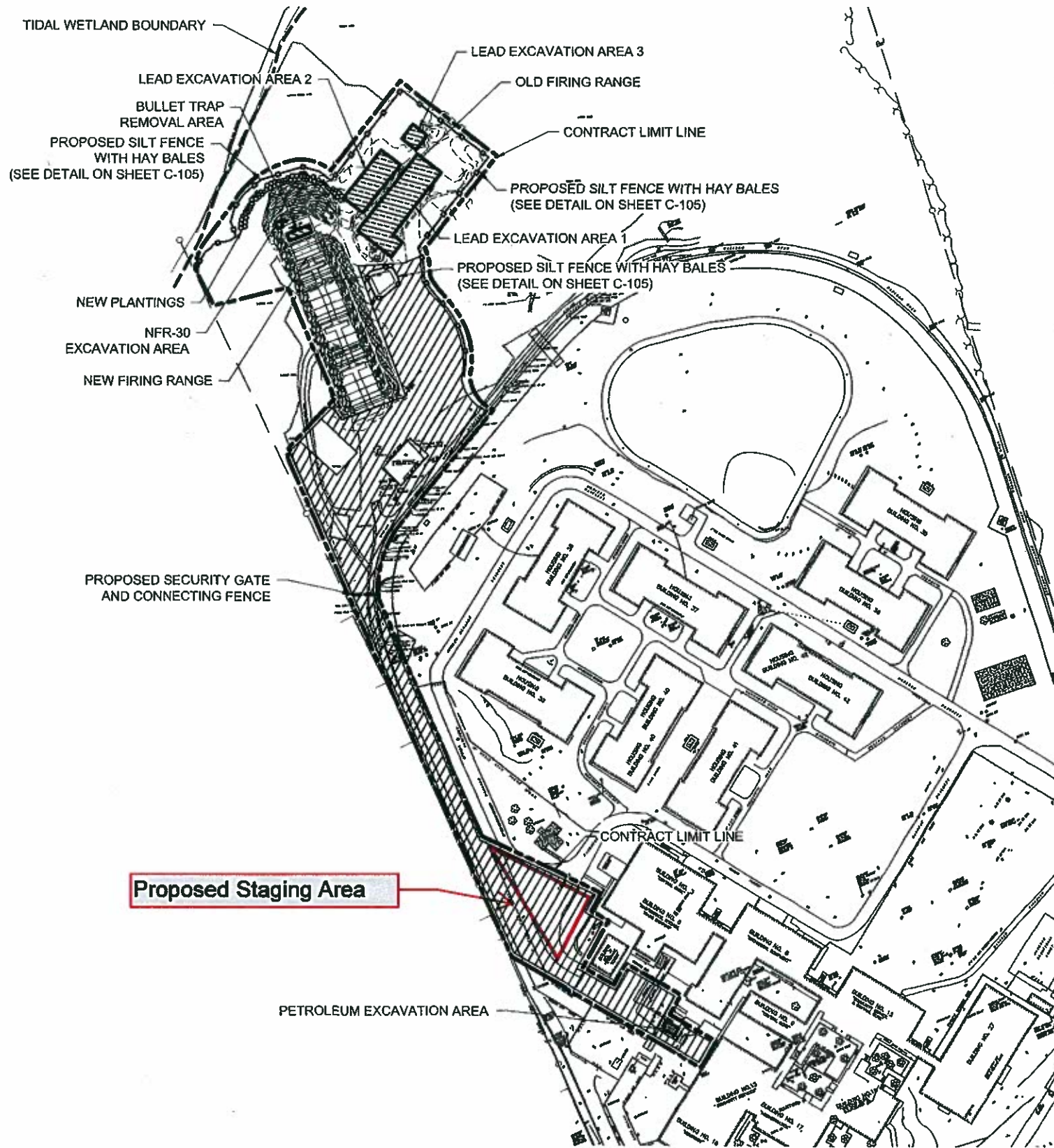
Regards,  
**C&S Engineers, Inc.**



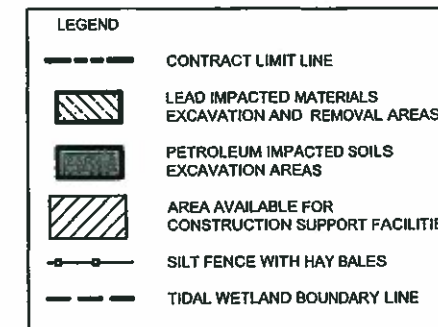
Mark Colmerauer  
**Managing Geologist**

cc: C. Sassano, OGS  
S. Nair. OGS

Encl. Figure 1, (sealed)



LOCATION MAP



REMEDIAL MEASURES SITE PLAN NOTES:

1. PREPARE AND SUBMIT PLAN OF OPERATIONS, TO INCLUDE A SITE MANAGEMENT PLAN DESIGNATING EXCLUSION ZONES, CONTAMINATION REDUCTION ZONES FOR WORKERS AND EQUIPMENT, AND MATERIALS HANDLING AND STORAGE AREAS. PLAN OF OPERATIONS WILL OUTLINE THE REMEDIAL CONSTRUCTION PROCESS AND COORDINATION WITH CONFIRMATION SAMPLING TO BE CONDUCTED BY THE DIRECTOR'S REPRESENTATIVE. PLAN OF OPERATIONS SHALL INCLUDE CONTRACTOR'S PLAN FOR DEMONSTRATING THAT HIS ON-SITE ACTIVITIES DO NOT RESULT IN MIGRATION OF LEAD IMPACTS TO ADJACENT AREAS (E.G., PRE-CONSTRUCTION AND POST-CONSTRUCTION SAMPLING OF AREAS TO BE UTILIZED FOR WASTE STORAGE, TREATMENT OR TRANSPORT AND FOR PERSONNEL OR EQUIPMENT DECONTAMINATION). FOR DETAILS SEE SPECIFICATION SECTIONS 011000 - SUMMARY OF THE WORK; 028335 - LEAD OR PETROLEUM CONTAMINATED SOIL REMOVAL; AND 013300 - SUBMITTALS.
2. PREPARE AND INSTITUTE A SITE-SPECIFIC HEALTH AND SAFETY PLAN FOR CONTRACTOR'S WORKERS; AIR MONITORING PLAN FOR PROTECTION OF SITE WORKERS AND THE PUBLIC; EROSION AND SEDIMENTATION CONTROL PLAN; AND A DUST SUPPRESSION PLAN. FOR DETAILS SEE SPECIFICATION SECTION 011000 - SUMMARY OF THE WORK AND SECTION 312513 - EROSION AND SEDIMENT CONTROL.
3. THE DIRECTOR'S REPRESENTATIVE IS RESPONSIBLE FOR OBTAINING THE PROJECT WETLAND DISTURBANCE PERMIT, NYSDC WATER QUALITY CERTIFICATION, AND/OR A PROJECT STORMWATER POLLUTION PREVENTION PLAN PERMIT. THESE PERMITS WILL BE PROVIDED TO THE CONTRACTOR. NO ELEMENTS OF THE CONTRACTOR'S PLANS OR ACTIVITIES MAY DEVIATE FROM THE REQUIREMENTS OF THE DIRECTOR'S PERMITS.

CONSULTANT

C&S Engineers, Inc.  
 499 Col. Eileen Collins Blvd.  
 Syracuse, New York 13212  
 Phone: 315-455-2000  
 Fax: 315-455-9667  
 www.cscos.com



CONTRACT:	CONSTRUCTION
TITLE:	REMEDIAL FIRING RANGE
LOCATION:	ARTHUR KILL CORRECTIONAL FACILITY 2911 ARTHUR KILL ROAD STATEN ISLAND, NY 10309-1101
CLIENT:	NEW YORK STATE DEPARTMENT OF CORRECTIONS AND COMMUNITY SUPERVISION

NO.	DATE	DESCRIPTION
4	1/19/14	FINAL
3	12/12/13	100% SUBMITTAL FINAL
2	10/18/13	100% SUBMITTAL
1	8/10/13	65% SUBMITTAL

PROJECT NUMBER:	<b>44546-C</b>
DESIGNED BY:	R. WOODMANSEE
DRAWN BY:	B. BUCKINGHAM
FIELD CHECK:	C. SASSANO
APPROVED:	R. WOODMANSEE
SHEET TITLE:	

Proposed Staging Area

Figure 1

SHEET 2 OF 7