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November 6, 2008

Division of Environmental Remediation
Remedial Bureau C, 11th Floor
New York State Department of
Environmental Conservation
625 Broadway
Albany, New York 12233-7014

Attention: Mr. Salvatore Priore, Project Manager

Subject: **2008 Supplemental Investigation Work Plan**
Old Erie Canal– Site No. 6-22-006
Work Assignment # D004434-9
MACTEC Engineering and Consulting, P.C. - Project No. 3650070085

Dear Mr. Priore,

This Supplemental Investigation Work Plan (WP) has been prepared by MACTEC Engineering and Consulting, P.C. (MACTEC), under contract to the New York State Department of Environmental Conservation (NYSDEC), for the Old Erie Canal (Site) in Frankfort, Herkimer County, New York. This Work Plan addresses comments on the Remedial Investigation Report received from the NYSDEC Division of Fish, Wildlife, and Marine Resources.

A Supplemental Investigation is proposed to provide additional data regarding PCB and inorganic sediment contamination and PCB surface water contamination both upgradient and downgradient of the Old Erie Canal. During the Remedial Investigation, a subset of the analytical data for PCBs in surface water and sediment had detection limits greater than the applicable standards and/or screening criteria. To provide lower detection level data for PCBs and metals, sampling of both additional and previously sampled locations are proposed. PCB surface water and sediment samples will be submitted to Mitkem Analytical Laboratory for laboratory analysis to achieve low detection limits; preliminary discussions with the laboratory indicate detection limits of 3.3 micrograms per kilogram and 0.05 micrograms per liter can be provided for sediment and surface water, respectively.

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The following additional sampling is proposed (see Figure 1):

1. Collection and analysis of surface water for PCBs and sediment for PCBs and metals from upgradient of the West Pond, either from an immediately upgradient stormwater catch basin, or from the upgradient forest wetland, pending physical access and adequate flow (SW-UWP, OESWUWP0000801 and SD-UWP, OESDUWP0000801);
2. Collection and analysis of surface water for PCBs and sediment for PCBs and metals from downgradient of the West Pond, either from an immediately downgradient stormwater catch basin, or from the outfall to the Old Erie Canal, pending physical access and adequate flow (SW-DWP, OESWDWP0000801 and SD-DWP, OESDDWP0000801);
3. Collection and analysis of surface water for PCBs and sediment for PCBs and metals immediately downgradient of the Old Erie Canal at previous sample location SW-5S (SW-5S, OESW05S0000801 and SD-5S, OESD05S0000801);
4. Collection and analysis of surface water for PCBs and sediment for PCBs and metals from downgradient of the confluence of the Old Erie Canal and drainage from Tributary 204
    a. (SW-CON, OESWCON0000801 and SD-CON, OESDCON0000801);
    b. (SW-DG1, OESWDG10000801 and SD-DG1, OESDDG10000801); and
    c. (SW-DG2, OESWDG20000801 and SD-DG2, OESDDG20000801);
5. Collection and analysis of surface water for PCBs and sediment for PCBs and metals from Tributary 204 upgradient of the confluence with the Old Erie Canal (SW-204, OESW2040000801 and SD-204, OESD2040000801);
6. Collection and analysis of surface water for PCBs and sediment for PCBs and metals from the East Pond at previous sample location SW-EP (SW-EP, OESW0EP0000801 and SD-EP, OESD0EP0000801).

At all sample locations, the surface water samples will be collected prior to collection of sediment samples. Where applicable, the downstream surface water and sediment samples will be collected prior to collection of any upstream samples. The sediment samples will be collected as composite samples using hand tools.

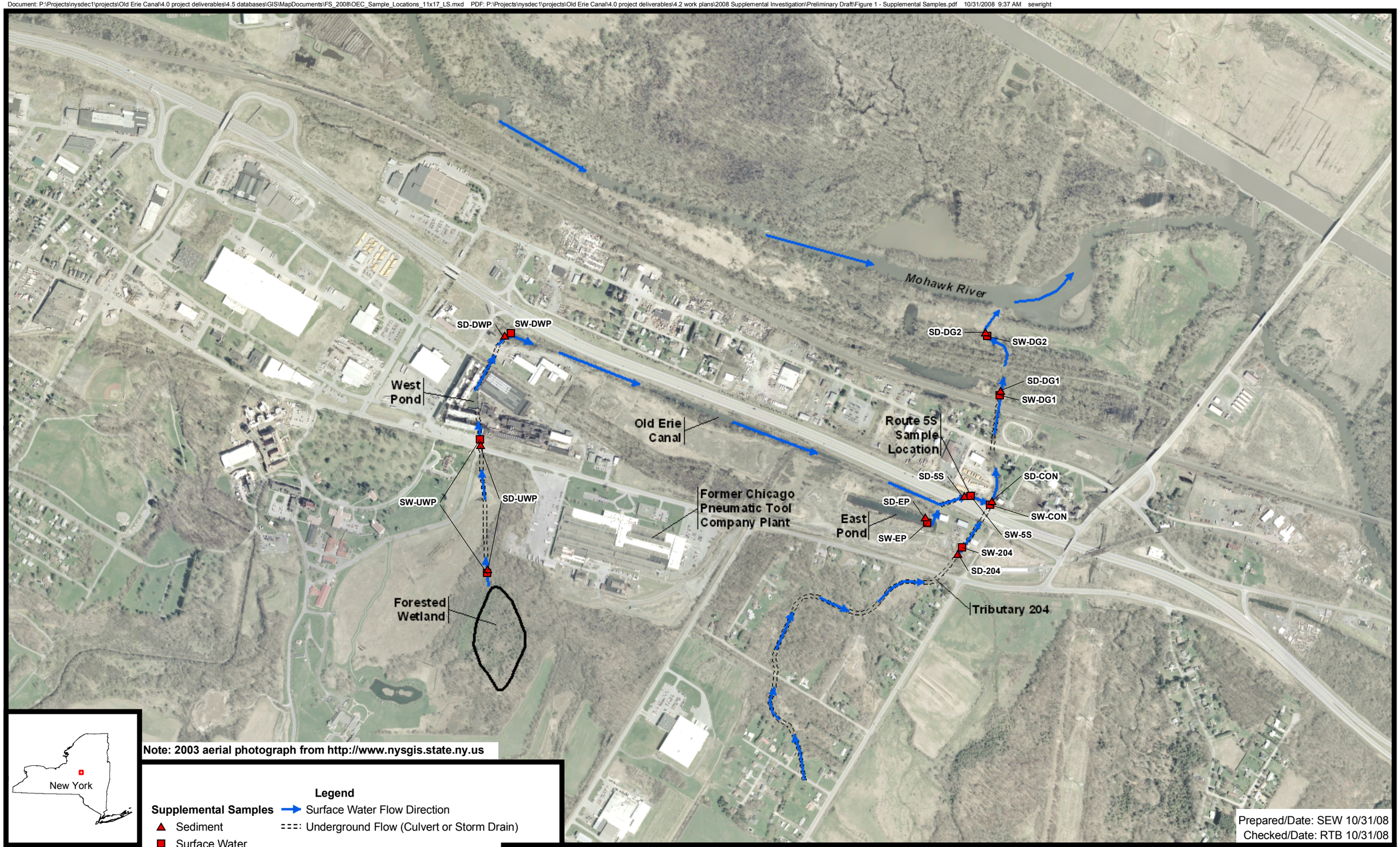
If you have any questions or concerns, please feel free to call myself at 207-828-3530 or John Peterson at 207-828-3644.

Sincerely,
MACTEC Engineering and Consulting, P.C.

Ryan T. Belcher
Project Engineer

John W. Peterson
Principal Professional

cc: File 4.2



Supplemental Investigation
Old Erie Canal - Town of Frankfort Section
Work Assignment No. D003826-14

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Surface Water and Sediment Sample Locations
Project 3640-04-0027 Figure 1