



October 12, 2005

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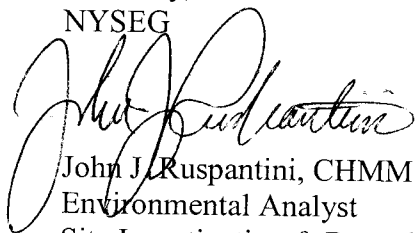
Subject: Auburn Clark Street Former MGP Site
SRI Interim Report/Proposed Scope of Expanded Work
Work Plan Addendum II

Dear Mr. Spellman:

Enclosed for your information and use is a proposed work plan addendum for the above-referenced site. This document briefly summarizes the results of investigation work completed per Work Plan Addendum I in August 2005 and presents a work scope and rationale for a second SRI expansion.

Pending your approval, NYSEG will advance the additional fieldwork as quickly as possible. We hope to begin soon before inclement weather has the potential to hamper our field efforts. If you have questions or comments concerning this work, please contact me by phone at (607) 762-8787 or by e-mail at jjruspantini@nyseg.com.

Sincerely,
NYSEG



John J. Ruspantini, CHMM
Environmental Analyst
Site Investigation & Remediation

cc: J. M. Simone
M. Gutmann – URS Corp.

Enclosure

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ATTACHMENT II

NEW YORK STATE ELECTRIC & GAS CORPORATION

SUPPLEMENTAL REMEDIAL INVESTIGATION

WORK PLAN ADDENDUM II

CLARK STREET FORMER MANUFACTURED GAS PLANT (SITE No. 7-06-008)

AUBURN, NEW YORK

OCTOBER 12, 2005

1.0 INTRODUCTION

This Work Plan Addendum summarizes the proposed work elements for the additional field investigations to be conducted as part of the Remedial Investigation at the NYSEG Clark Street site in Auburn, New York. This Work Plan Addendum must be used in conjunction with the existing Supplemental Remedial Investigation Work Plan, Quality Assurance Project Plan, Health and Safety Plan, and Field Sampling Plan (URS, October 2004). This addendum must be attached to the Supplemental Remedial Investigation Work Plan as Attachment II.

2.0 PURPOSE

The objectives of the additional field investigations are to delineate the horizontal and vertical extent of non-aqueous phase liquid (NAPL) in the bedrock, and to delineate the horizontal and vertical extent of the groundwater contaminant plume in the bedrock groundwater regime. The additional work elements needed to achieve the objectives were based upon data gathered as part of recent work completed at the site. Some of the data was summarized in the *Interim Summary Data Report, Former Clark Street Manufactured Gas Plant Site, Auburn, New York*, submitted to NYSDEC in March 2005. Key findings of the most recent round of field activities are presented herein.

3.0 RESULTS OF AUGUST 2005 FIELDWORK

Subsequent to the findings of the Interim Summary Report, one round of additional work was completed at the site in early August 2005. Bedrock monitoring wells MW-08D, MW-09D, MW-10D, MW11D were installed on the north side of the Owasco Outlet per the work scope outlined in Work Plan Addendum 1, (Attachment I?; dated June 6, 2005) Visual observations and Packer test data prompted the installation of two additional bedrock monitoring wells, MW-12D (east of MW-11D) and MW13B (west of MW-7B Based upon visual observations and detailed rock core inspection and dense non-aqueous phase liquid (DNAPL) observations from the August 2005 work done on MW-13B, no MGP-related impact existed at this location. However, the packer results and visual observations from the remaining bedrock wells installed in August 2005 indicate the need for additional wells to further delineate the extent of groundwater

contamination. Visual observations of DNAPL in these well drillings suggest that tar may be moving through the bedrock in a northeasterly direction, in a zone of east/west trending bedrock fractures. Packer test results indicated a decrease in concentrations of contaminants with depth. Detected concentrations of volatile organic compounds (VOCs) and semi-volatile organic compounds (SVOCs) were less in packer samples collected at depths greater than 50 feet below ground surface (Figures 1 and 2).

4.0 SCOPE OF WORK

The work scope is divided into the tasks listed below:

- Five additional deep-bedrock monitoring wells (MW-14D, MW-15D, MW-16D, MW-17D, and MW-18D) will be installed north of the Owasco outlet at the approximate locations shown on Figure 3.
- At the new deep bedrock well locations, the bedrock will be continuously cored until DNAPL is not observed in the bedrock or a maximum depth of approximately 50 to 60 feet below the top of bedrock. The core holes at locations at MW-14D, MW-15D, and MW-16D will be packer tested at 10-foot intervals using a single packer. Packer testing procedures are provided in Section 4.2. MW-17D and MW-18D will not be packer tested because DNAPL appears to be migrating northeast of the site and DNAPL was not observed in existing monitoring wells MW-08D and MW-10D. As shown in Table 1, groundwater samples collected during packer testing will be analyzed for BTEX and STARs PAHs and 2-methylnaphthalene and dibenzofuran. The data will be used to assess the vertical extent of the groundwater plume.
- Forensic PAH profile samples will be collected from up to three packer-tested intervals with NAPL (if detected).
- Groundwater samples will be collected from overburden wells MW-08S, MW-09S, MW-10S, MW-11S as one of the first field tasks during this phase of work. The Department has inquired about these wells specifically and NYSEG has decided to expedite sampling of these wells. After the five new wells are installed and developed, the 21 remaining existing overburden and bedrock monitoring wells and the five newly installed monitoring wells will be sampled in a synoptic round. The groundwater samples will be analyzed for the parameters listed in Table 1.

- Groundwater potentiometric surface maps have been generated for the overburden and shallow bedrock zones. Figures 4 and 5 present the groundwater contours in the overburden on August 24, 2005, and September 1, 2005, respectively. Figure 6 presents the groundwater contours in the shallow bedrock on September 1, 2005. A potentiometric surface map for the deep bedrock was not generated of the long open hole intervals of MW-09D, MW-11D, and MW-12D. The long open hole intervals average the hydraulic interactions across the zones. As a result, potentiometric data from the deep portions of these wells are not yet available. During the upcoming fieldwork, NYSEG proposes to measure the potentiometric head in wells MW-08D through MW-12D, as well as the newly proposed wells, MW-14D through MW-18D using a portable inflatable packer unit. The unit will be made up of a one-inch PVC riser, and appropriate air lines and regulators for inflating the packer with nitrogen. At each well, the potentiometric head will be measured at approximately 10 foot intervals. These data will be used to develop potentiometric surface maps of the bedrock aquifer.
- Based upon the potentiometric data gathered as part of the previous task, as well as the stratigraphic and hydraulic information obtained as part of all field investigations, NYSEG will provide to the Department a letter of recommendation for retrofitting open hole bedrock monitoring wells. The letter of intent with rationale will be provided to the Department prior to completing this proposed phase of field work.

5.0 METHODS

5.1 Bedrock Monitoring Wells

Methods and procedures are described in Section 2.3 of the FSP.

5.2 Packer Testing/Sampling

Packer testing will be conducted during coring of the bedrock at three monitoring well locations (MW-14D, MW-15D, and MW-16D). Packer testing will be conducted to gather

information regarding water yield, hydraulic properties of the bedrock and the presence or absence of NAPL along with dissolved phase concentrations of indicator compounds. Packer samples will be collected to characterize the groundwater flow zones within the lower Marcellus Shale and Onondaga Limestone units.

A single packer will be used to isolate the bottom 10 feet of the borehole and a submersible pump will be used to pump the groundwater from the borehole. Groundwater samples from each 10-foot packer interval will be collected from wells (MW-14D, MW-15D, and MW-16D). The packer samples will be analyzed for BTEX (Method 8260B) and PAHs (Method 8270C) unless NAPL is observed in the drilling water or rock core. If NAPL is detected, a forensic extended PAH profile analytical sample will be collected at up to three locations, to be determined in the field in consultation with the NYSDEC representative. The groundwater samples will be collected after purging a minimum of three borehole volumes from the packer interval. If the packer interval goes dry during purging, then the groundwater sample will be collected after the borehole recovers.

Once the bedrock is cored to the desired total depth, the borehole will then be reamed to a nominal 4-inch diameter using a roller bit to a maximum depth of approximately 50 to 60 feet below the top of bedrock. The bedrock wells will remain as open bedrock monitors.

5.3 Deep Bedrock Packer Interval Hydraulic Monitoring

A portable inflatable packer unit with one-inch PVC Riser, and appropriate air lines and regulators for inflating the packer with nitrogen will be used at wells MW-08D through MW-12D and wells MW-14D through MW-18D. At each well approximately 10 foot of the well will be sealed at a time and the water levels in the inner and outer risers will be monitored until they return to static conditions. Upon reaching static conditions the assembly will be raised or lowered and the next depth zone will be monitored in the same manner. The wells will be monitored in this way during the same day to obtain comprehensive potentiometric surface data for the site.

6.0 ANALYTICAL PROGRAM

Table 1 summarizes the laboratory analytical program for these additional investigations. Severn Trent Laboratories, Inc. (STL) in Amherst, New York, a New York State ASP Laboratory, will analyze samples collected during this phase of the RI. STL will provide ASP Category B Quality Assurance/Quality Control (QA/QC) deliverables package for analytical data. META Environmental, Inc. of Watertown, Mass. will conduct the forensic PAH analyses. Table 2 summarizes the sample preservation requirements, bottle requirements, and holding times for the analytical parameters.

TABLE 1
SAMPLING AND ANALYSIS PROGRAM ADDENDUM
NYSEG - FORMER CLARK STREET MGP SITE

Analytical Method ¹	Matrix ²	No. of Field Samples	Field Duplicates ³	Equipment Blanks ³	Trip Blanks ⁴	MS/MSD (Pairs) ³	Total No. of Samples
Groundwater Sampling							
BTEX (USEPA Method 8260B)	GW	29	2	2	5	2	42
PAHs (USEPA Method 8270C)		29	2	2	0	2	37
Total Phenols (USEPA Method 9065/420.2)		29	2	2	0	2	37
Total Cyanide (USEPA Method 9012A)		29	2	2	0	2	37
Free Cyanide (USEPA Method 9012A) ⁵		6	1	1	0	1	10
Iron Cyanide Speciation (Ion Chromatography) ⁵		6	1	1	0	1	10
Alkalinity (USEPA Method 310.1)		29	2	2	0	2	37
Chloride (USEPA Method 300.0)		29	2	2	0	2	37
Nitrate (USEPA Method 300.0)		29	2	2	0	2	37
Nitrite (USEPA Method 300.0)		29	2	2	0	2	37
Sulfate (USEPA Method 300.0)		29	2	2	0	2	37
Sulfide (USEPA Method 376.2)		29	2	2	0	2	37
Dissolved Iron (USEPA Method 6010B) - Field Filtered		29	2	2	0	2	37
Ferrous Iron (Field analysis)		29	2	2	0	2	37
Total Dissolved Solids (USEPA Method 160.1)		29	2	2	0	2	37
Packer Testing/Groundwater and NAPL Sampling							
BTEX (USEPA Method 8260B)	GW	25	2	2	5	2	38
PAHs (USEPA Method 8270C) (1-week TAT) ⁶		25	2	2	0	2	33
Fingerprint/Forensic PAH Analysis (Modified Methods 8100/8270C)	NAPL	3	0	0	0	0	3

1. Test Methods for Evaluating Solid Waste, Physical Chemical Methods (SW-846) USEPA Final Update III, June 1997
 Methods for Chemical Analysis of Water and Wastes, EPA-600/4-79-020, USEPA, Revised March 1983

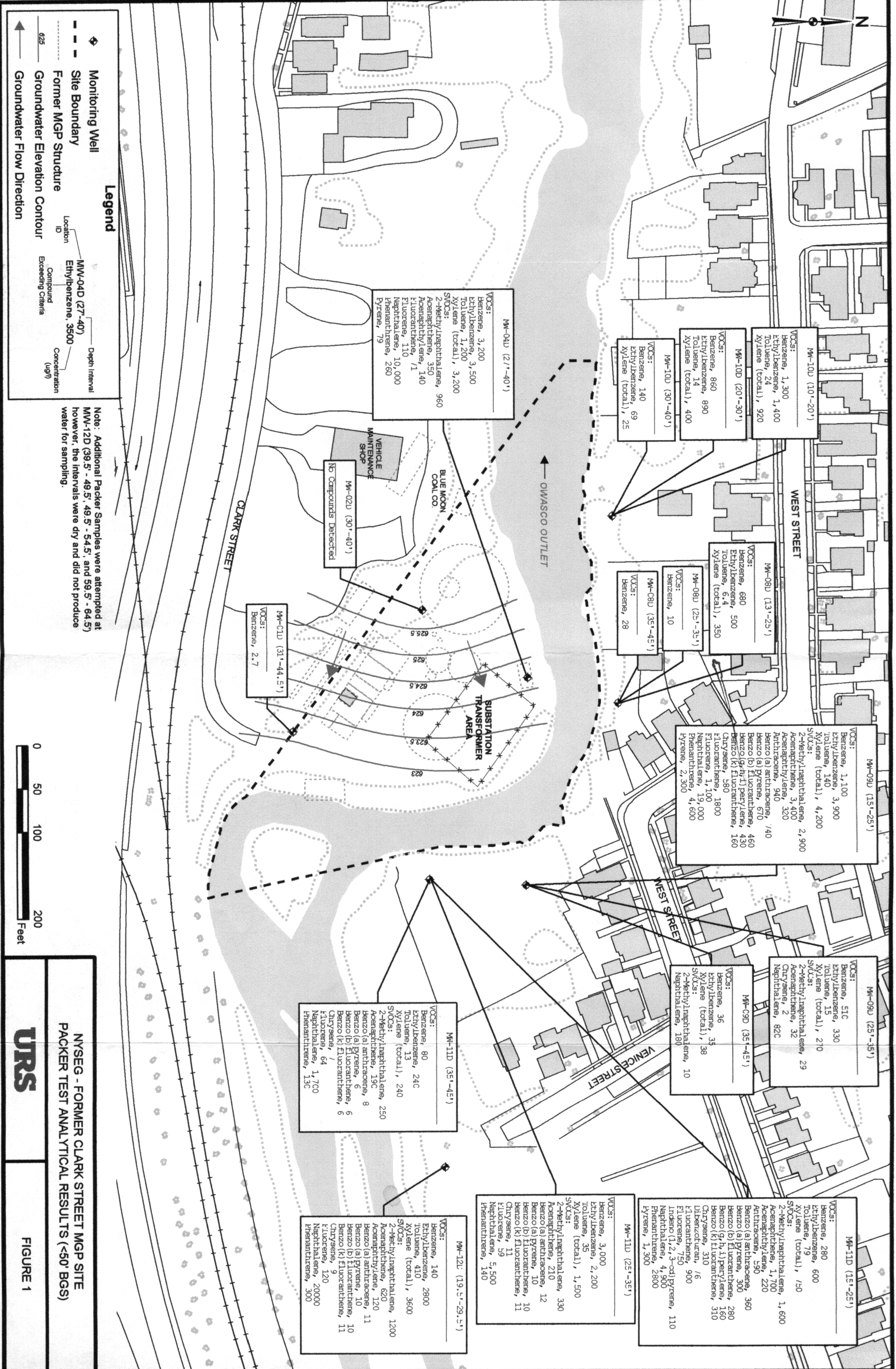
TCL - USEPA Superfund Target Compound List
 SVOCs - Semivolatile Organic Compounds
 BTEX - Benzene, toluene, ethylbenzene, and xylenes
 PAHs - Polyaromatic hydrocarbons

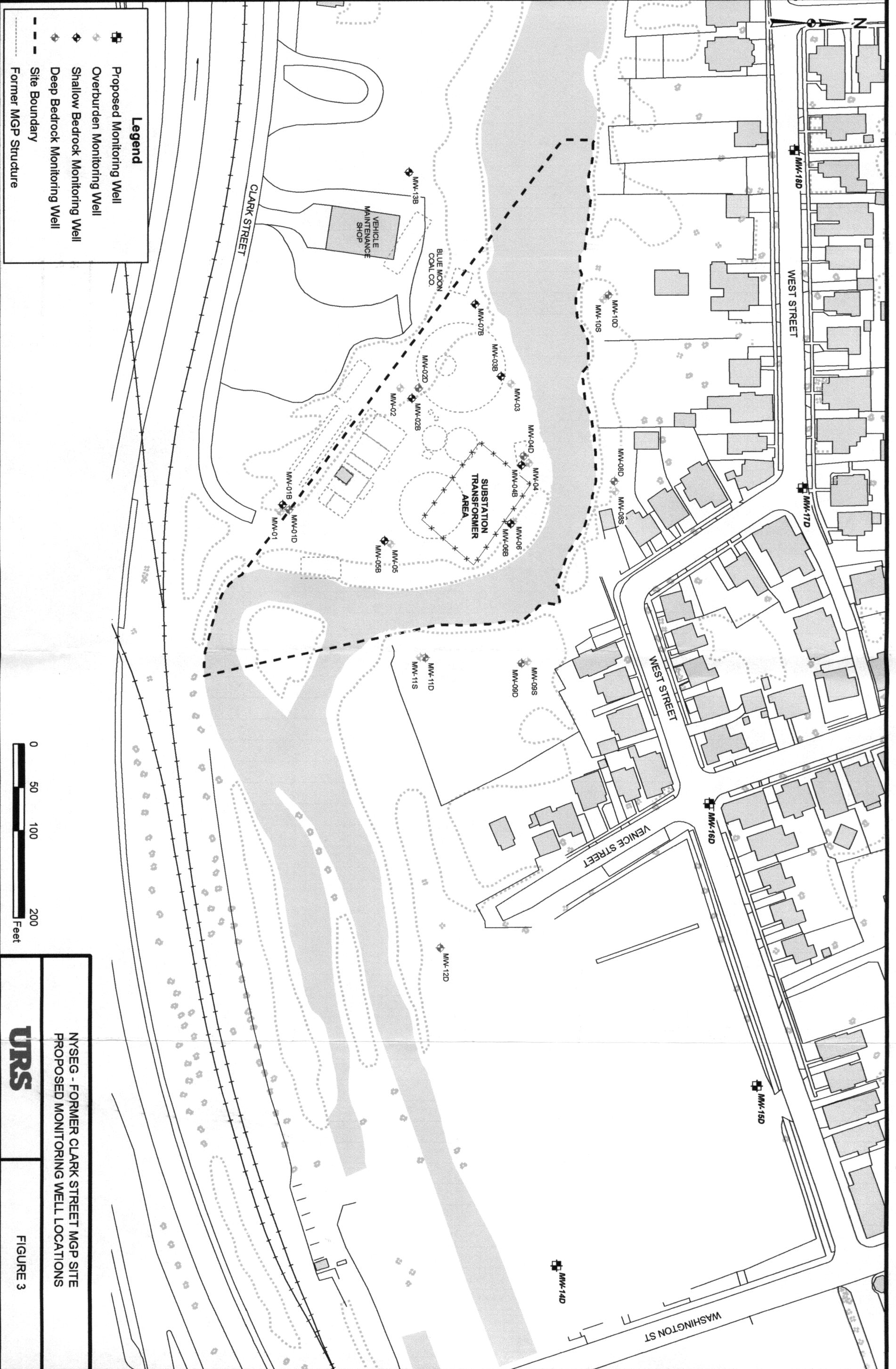
2. GW - groundwater, NAPL - non-aqueous phase liquid
3. Assumes a 5% frequency (one per 20 field samples)
4. Approximate - Assumes one per day of field sampling for water samples only
5. Will be analyzed as needed if total cyanide concentration exceeds applicable regulatory criteria.
6. PAHs include acenaphthene, acenaphthylene, anthracene, benzo(a)anthracene, benzo(b)fluoranthene, benzo(k)fluoranthene, benzo(ghi)perylene, benzo(a)pyrene, chrysene, dibenz(a,h)anthracene, fluoranthene, fluorene, indeno(1,2,3-cd)pyrene, 2-methylnaphthalene, naphthalene, phenanthrene, pyrene, and dibenzofuran.

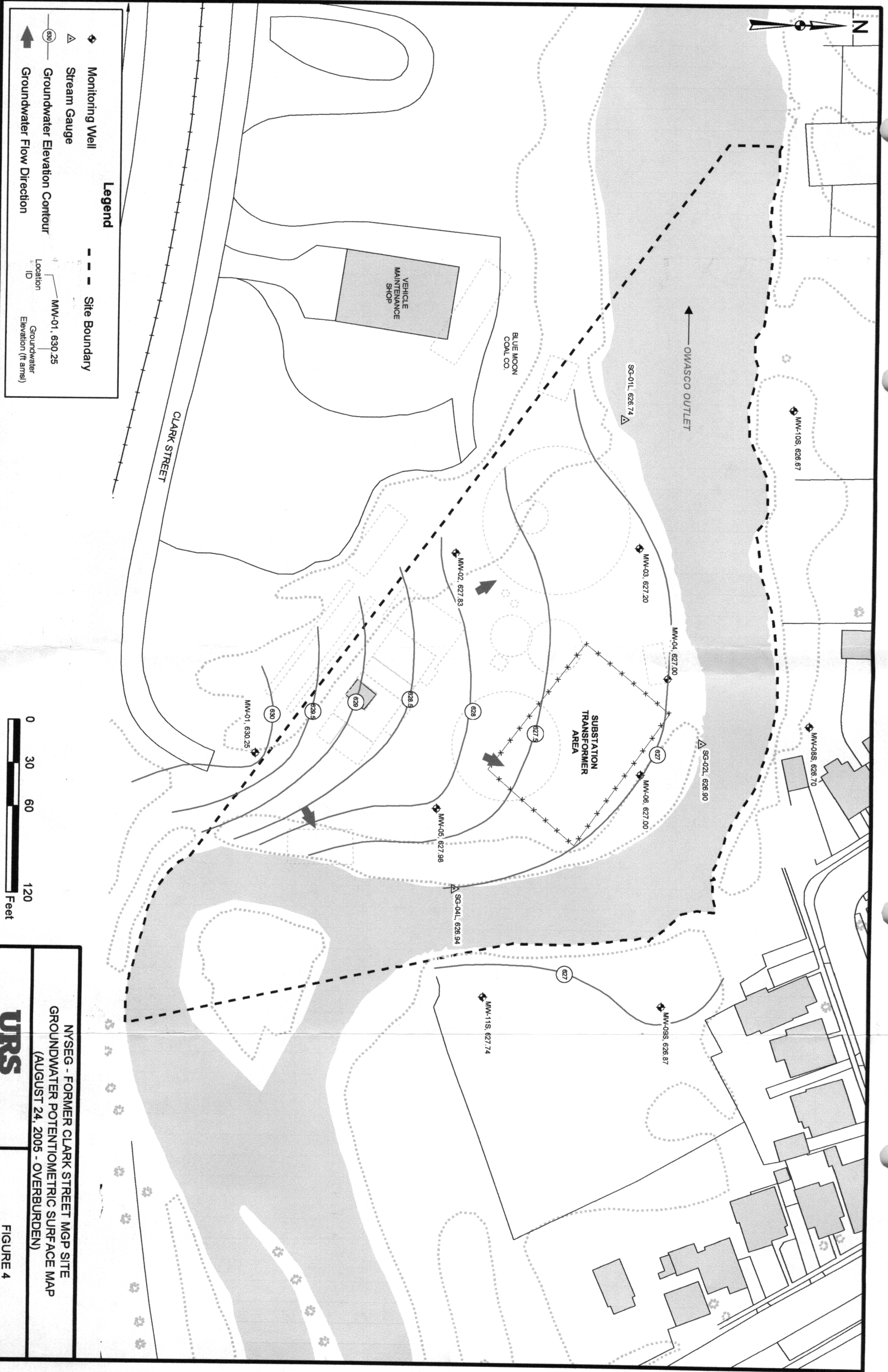
TABLE 2
SAMPLE CONTAINERS, PRESERVATION, AND HOLDING TIMES
NYSEG - FORMER CLARK STREET MGP SITE

Test Type	Container	Preservation	Holding time
Field Measurements			
Field pH	4 oz. wide-mouth glass	N/A	Immediate
Field temperature	4 oz. wide-mouth glass	N/A	Immediate
Field conductance	4 oz. wide-mouth glass	N/A	Immediate
Lab Measurements			
AQUEOUS SAMPLES			
BTEX (EPA Method 8260B)	3-40 ml septa vials, Glass	HCl to pH < 2	Analyze within 14 days.
PAHs (EPA Method 8270C)	2-1 Liter Amber Glass	Cool 4 °C	Extract within seven days; analyze within 40 days
Total Phenols (EPA Method 9065/420.2)	1-8 oz. Amber Glass	H ₂ SO ₄ to pH < 2	Analyze within 28 days.
Cyanide, Total/Free (EPA 9012A/335.3)	1-8 oz., Plastic	NaOH to pH > 12 0.6g ascorbic acid	Analyze within 14 days.
Iron Cyanide Speciation (Ion Chromatography)	1-8 oz., Plastic	NaOH to pH > 12 0.6g ascorbic acid	Analyze within 14 days.
Alkalinity (EPA 310.1)	1-32 oz., Plastic	Cool 4 °C	Analyze within 14 days.
Chloride (EPA 300.0)			Analyze within 28 days.
Nitrate (EPA 353.1)			Analyze within 48 hours.
Nitrite (EPA 354.1)			Analyze within 48 hours.
Sulfate (EPA 300.0)			Analyze within 28 days.
Total Dissolved Solids (EPA 160.1)			Analyze within 7 days.
Sulfide (EPA 376.2)			1-8 oz., Plastic
TAL Metals (EPA Methods 6010B/7470A)	1-8 oz., Plastic	HNO ₃ to pH < 2	Analyze within 6 months.
Dissolved Iron (EPA 6010B)	1-8 oz., Plastic	HNO ₃ to pH < 2	Field filter immediately, analyze within 6 months.

TAL - USEPA Superfund Target Analyte List
SVOCs - Semivolatile Organic Compounds
BTEX - Benzene, toluene, ethylbenzene, and xylenes
PAHs - Polyaromatic hydrocarbons



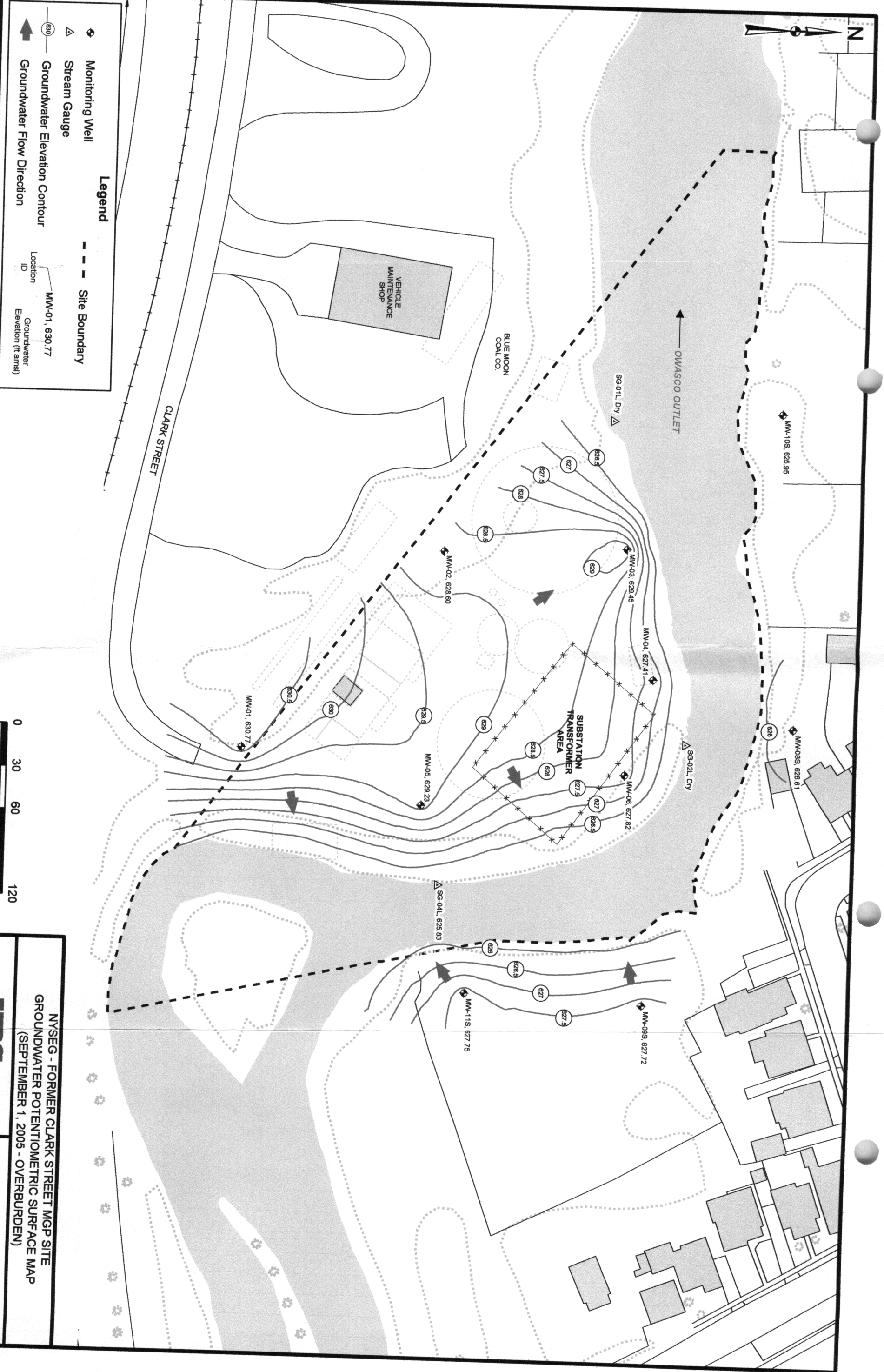




NYSEG - FORMER CLARK STREET MGP SITE
 GROUNDWATER POTENTIOMETRIC SURFACE MAP
 (AUGUST 24, 2005 - OVERBURDEN)

URS

FIGURE 4



Legend

- Monitoring Well
- Stream Gauge
- Groundwater Elevation Contour
- Groundwater Flow Direction
- Site Boundary
- MW-01, 630.77
Location ID Groundwater Elevation (ft amsl)



NYSEG - FORMER CLARK STREET MGP SITE
 GROUNDWATER POTENTIOMETRIC SURFACE MAP
 (SEPTEMBER 1, 2005 - OVERBURDEN)

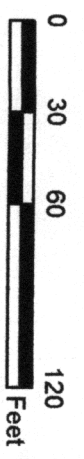
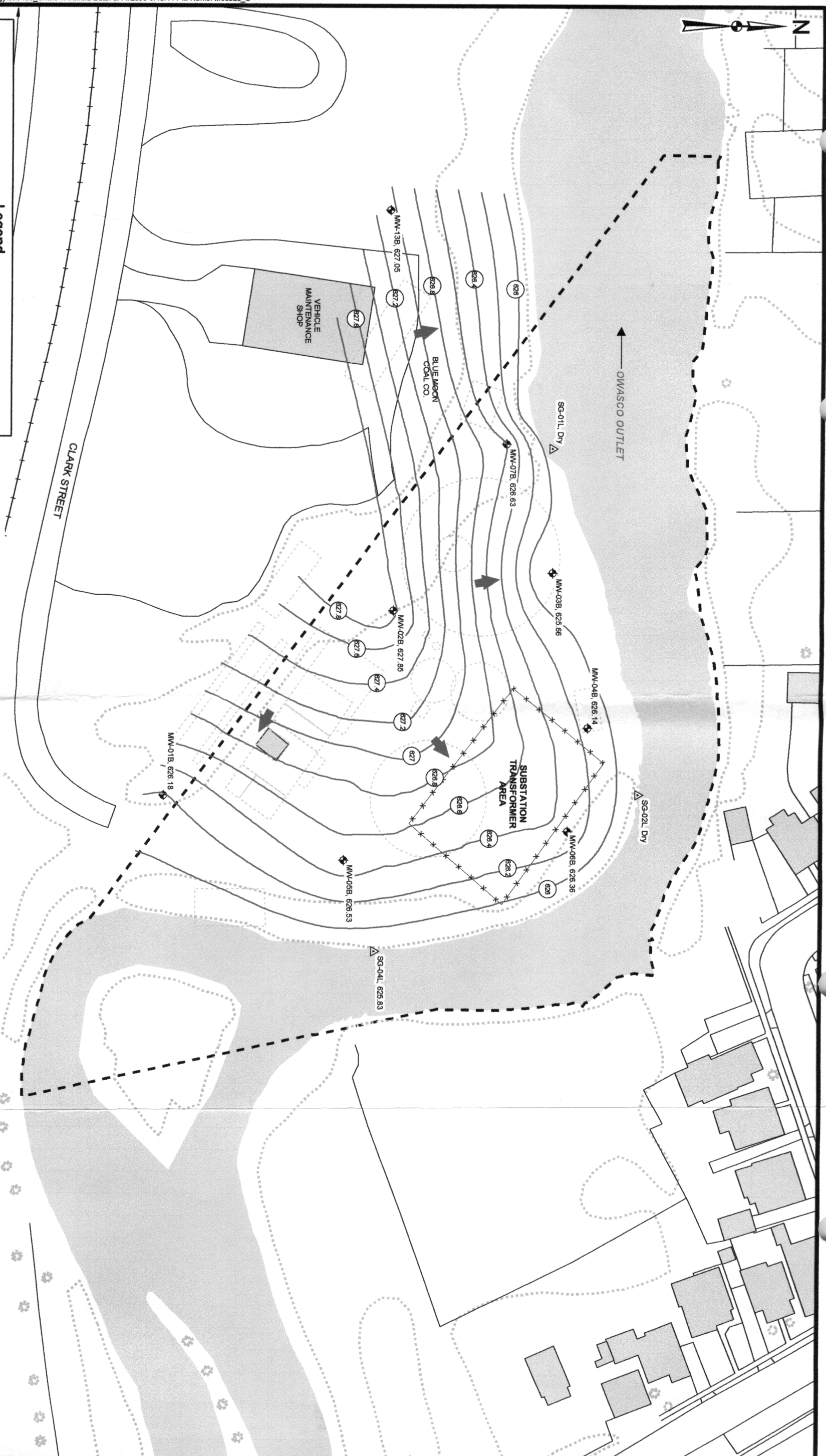
URS

FIGURE 5



Legend

- ◆ Monitoring Well
- ▲ Stream Gauge
- Groundwater Elevation Contour
- Groundwater Flow Direction
- - - Site Boundary
- Location ID: MW-01B, 626.18
- Groundwater Elevation (ft arms)



NYSEG - FORMER CLARK STREET MGP SITE
 GROUNDWATER POTENTIOMETRIC SURFACE MAP
 (SEPTEMBER 1, 2005 - SHALLOW BEDROCK)

URS

FIGURE 6