

From: "Brien, Jason" <Jason.Brien@arcadis-us.com>
To: "jtspellm@gw.dec.state.ny.us" <jtspellm@gw.dec.state.ny.us>
CC: "John Ruspantini (jjruspantini@nyseg.com)" <jruspantini@nyseg.com>, "Cornell, David" <David.Cornell@arcadis-us.com>
Date: 6/13/2012 3:22 PM
Subject: NYSEG Clark St. - Additional NAPL Monitoring Work Plan
Attachments: 1011211487_NAPL Monitoring Work Plan_FINAL.PDF

John,

Please see the attached work plan for conducting additional NAPL monitoring activities at the NYSEG Clark St. former MGP site located in Auburn, NY. A hard copy of this letter will follow via US Mail. Please let me or John Ruspantini know if you have any questions. Thanks.

Jason Brien, P.E. | Principal Engineer | jason.brien@arcadis-us.com<mailto:jason.brien@arcadis-us.com>

ARCADIS U.S., Inc. | 6723 Towpath Road | Syracuse, NY 13214
T: 315.671.9114 | M: 315.263.5898
www.arcadis-us.com<http://www.arcadis-us.com/>

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John Spellman, P.E.
New York State Department of Environmental Conservation
Division of Environmental Remediation
625 Broadway, 11th Floor
Albany, New York 12233-7017

Subject:
NYSEG Clark Street Former MGP Site – Auburn, New York
Additional NAPL Monitoring Activities

Dear Mr. Spellman:

On behalf of NYSEG, this letter presents a work plan for conducting additional non-aqueous phase liquid (NAPL) monitoring activities at the NYSEG Clark Street Former Manufactured Gas Plant (MGP) Site located in Auburn, New York (Site No. 7-06-007).

A year-long monthly NAPL monitoring program was conducted at the site from January 2010 to May 2011 in general accordance with the New York State Department of Environmental Conservation (NYSDEC) Record of Decision (ROD) (NYSDEC, 2009) and the NYSDEC-approved February 2010 *Remedial Design Work Plan* (RDWP) (ARCADIS, 2010). The objective of the NAPL monitoring program was to gather data related to the presence and location of NAPL collecting in existing site bedrock monitoring wells. Detailed results of the year-long NAPL monitoring activities were presented to the NYSDEC in a December 9, 2011 Monthly NAPL Monitoring Program – Annual Report. Upon receipt, NYSDEC subsequently requested (via a February 24, 2012 email to NYSEG) that NAPL monitoring continue at the site until remedial construction commences (anticipated late 2013).

Over the course of the year-long monitoring program, measureable thicknesses of NAPL were encountered in seven of the 25 bedrock monitoring wells (i.e., monitoring wells MW-03B, MW-04B, MW-4D, MW-05B, MW-06B, MW-07B, and MW-11D). The locations of monitoring wells included in the year-long NAPL monitoring program are shown on Figure 1. Measureable quantities of NAPL were recovered from each of the above-referenced monitoring wells with the exception of MW-4B during the year-long monitoring program.

ARCADIS of New York, Inc.
6723 Towpath Road
P O Box 66
Syracuse
New York 13214-0066
Tel 315 446 9120
Fax 315 449 0017
www.arcadis-us.com

ENVIRONMENTAL

Date:
June 13, 2012

Contact:
Jason Brien, PE

Phone:
315.671.9114

Email:
jason.brien@arcadis-us.com

Our ref:
B0013091.0002.00040

Imagine the result

Proposed additional NAPL monitoring activities consist of the following:

- Gauging monitoring wells for the presence of NAPL.
- Removing NAPL to the extent possible using disposable polyethylene bailers.
- Containerizing recovered NAPL, personal protective equipment (PPE), and disposable monitoring equipment in labeled 55-gallon drums to be stored on-site in a locked drum locker until transported for off-site disposal by NYSEG.

For the initial monitoring event NYSEG is proposing to gauge each of the 25 wells that were gauged during the year-long monitoring program (as shown on Figure 1). Following the initial additional NAPL monitoring event, NYSEG will contact NYSDEC to discuss the findings and request that the number of wells gauged during subsequent monitoring events be reduced to those where NAPL was observed during the yearlong monitoring program as well as any additional wells where NAPL may be observed during the initial NAPL monitoring event.

The NAPL monitoring activities will be conducted in accordance with the protocols presented in the NYSDEC-approved RDWP (inclusive of the Field Sampling Plan) as well as the attached Job Safety Analysis (JSA).

NAPL monitoring will be conducted on a semi-annual basis until the commencement of upland remedial activities, with the initial monitoring event being conducted approximately two weeks following NYSDEC approval of this letter work plan.

Results obtained from the additional NAPL monitoring activities will be documented in memorandums following each monitoring event and will be prepared consistent with the memorandums for the previously completed monthly NAPL monitoring activities.

Please do not hesitate to contact Mr. John Ruspantini of NYSEG at 607.762.8787 or the undersigned at 315.671.9114 if you have any questions or comments regarding these proposed activities.

Sincerely,

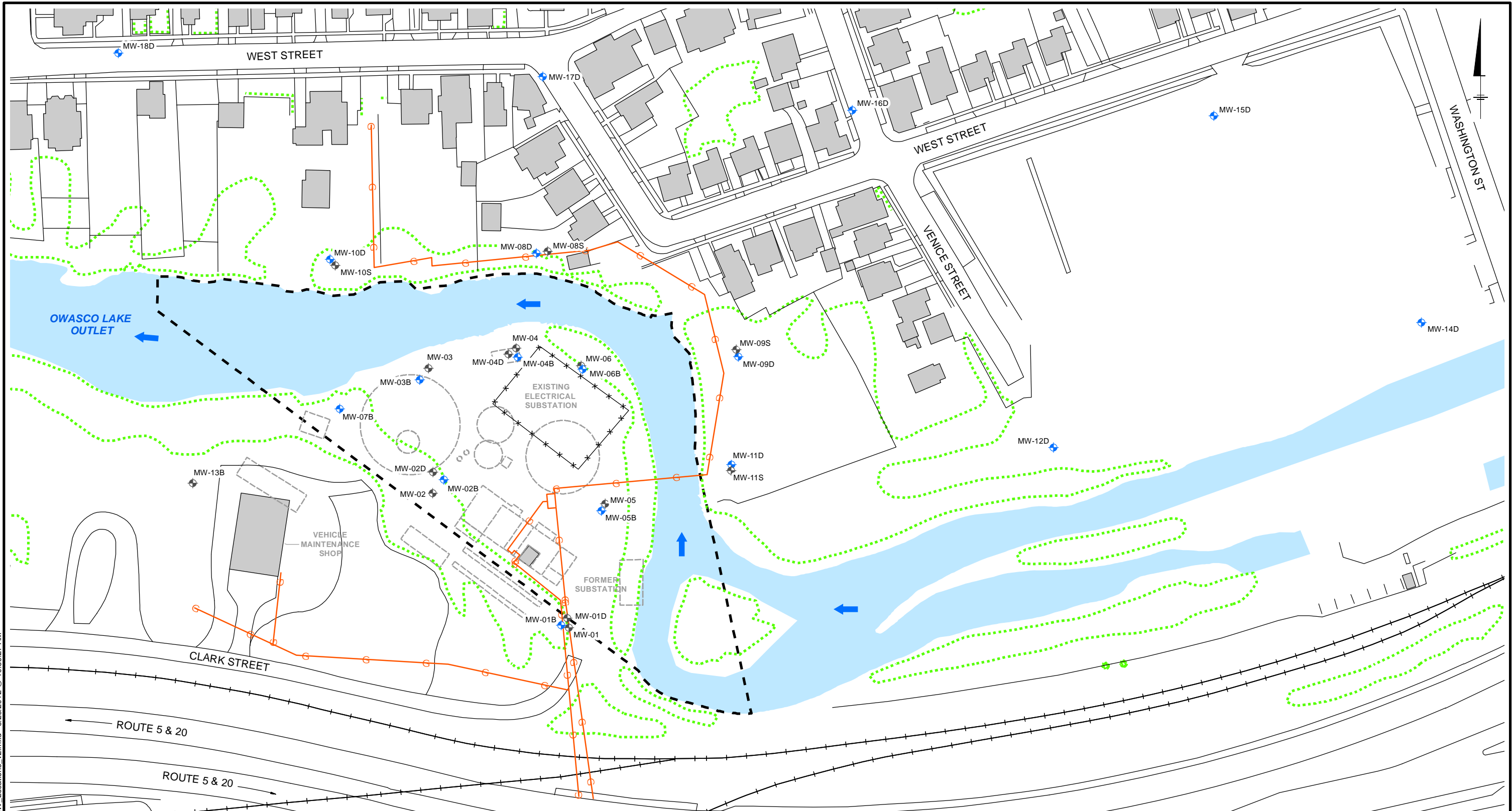
ARCADIS of New York, Inc.

A handwritten signature in blue ink, appearing to read "Jason Brien".

Jason Brien, P.E.
Principal Engineer

Copies:

Richard Jones, NYSDOH
John Ruspantini, NYSEG
Terry W. Young, P.E., ARCADIS



CITY: SYR DIV/GROUP: 40 DB: K. SINSABAUGH PM: JB
 NYS/EG (E0013091.0002.00040)
 C:\NYS\EG\FormerMGP\GIS\Workplan\mxd\MW_Locations_v2.mxd - 5/23/2012 @ 10:36:27 AM

- LEGEND:**
- ◆ EXISTING MONITORING WELL PROPOSED FOR NAPL MONITORING
 - ◆ EXISTING MONITORING WELL NOT PROPOSED FOR NAPL MONITORING
 - NATURAL GAS LINE
 - x-x- CHAIN LINK FENCE
 - + -+ RAILROAD
 - TREE LINE
 - - - FORMER MGP STRUCTURE/FORMER ELECTRICAL SUBSTATION
 - EXISTING BUILDING
 - - - SITE BOUNDARY (SEE NOTE 2)



- NOTES:**
1. BASEMAP GENERATED FROM SUPPLEMENTAL REMEDIAL INVESTIGATION REPORT FIGURE 1-2 PREPARED BY URS (1117329.00000\DB\GIS\SITEPLAN.MXD) DATED 07/13/2006.
 2. SITE BOUNDARY AS DEPICTED IN NYSDEC ROD.

NYSEG
 CLARK STREET FORMER MGP SITE
 AUBURN, NEW YORK

MONITORING WELL
 LOCATION MAP

FIGURE
1

Attachment 1

Job Safety Analysis –
NAPL Gauging

Job Safety Analysis

General

JSA ID	7511	Status	(4) Revise
Job Name	Environmental-Groundwater Sampling and free product recovery	Created Date	5/17/2012
Task Description	NAPL gauging and product recovery	Completed Date	
Template	False	Auto Closed	False

Client / Project

Client	IBERDROLA USA
Project Number	B00130910002
Project Name	NYSEG CLARK STREET
PIC	WHITE, KEITH
Project Manager	BRIEN, JASON

User Roles

Role	Employee	Due Date	Completed Date	Supervisor	Active
Developer	Zuranski, Laura	5/31/2012		Golubski, Jason	<input checked="" type="checkbox"/>
HASP Reviewer	Edwards, Lauren			Coppola, Mija	<input checked="" type="checkbox"/>

Job Steps

Job Step No.	Job Step Description	Potential Hazard	Critical Action	H&S Reference
1	Stage at pre-determined sampling location and set up work zone and sampling equipment	1 Personnel could be hit by vehicular traffic	Set up cones and establish work area. Position vehicle so that field crew is protected from site traffic. Unload as close to work area as safely possible.	
		2 Sampling equipment, tools and monitoring well covers can cause tripping hazard	Keep equipment picked up and use TRACK to assess changes.	
2	Open wells to equilibrate and gauge wells	1 When squatting, personnel can be difficult to see by vehicular traffic.	Wear class II traffic vest if wells are located proximal to vehicular traffic. Use tall cones and the buddy system if practicable.	
		2 Pinchpoints on well vault can pinch or lacerate fingers	Use correct tools to open well vault/cap. Wear leather gloves when removing well vault lids, and chemical protective gloves while guaging. Wear proper PPE including safety boots, knee pads and safety glasses.	
		3 Lifting sampling equipment can cause muscle strain	Unload as close to work area as safely possible; use proper lifting and reaching techniques and body positioning; don't carry more than you can handle, and get help moving heavy or awkward objects.	
		4 Pressure can build up inside well causing cap to release under pressure	Keep head away from well cap when removing. If pressure relief valves are on well use prior to opening well	
3	Collect GW or Free Product Sample	1 Working with bailer rope can cause rope burns on hands.	Slowly raise and lower the rope or string for the bailer. Wear appropriate gloves for the task.	
		2 Sample containers could break or leak preservative	Discard any broken sampleware or glass properly. Do not overtighten sample containers. Wear chemical protective gloves.	
4	Recovery of Free Product from well	1 Exposure to free product	Additional chemical protection may be necessary based on the type of product. Additionally, safety goggles, a faceshield, or respiratory protection may be required. Verify in the HASP.	
5	Staging of Well Purge water and/or Free Product	1 Muscle strains can occur when moving purge water or drums	If using buckets, do not fill buckets up to the top. Always keep lid on buckets when traveling or moving them to another location. Only half fill buckets so when dumping the buckets weigh less. See drum handling JSA for movement of drums.	Drum handling JSA

PPE Personal Protective Equipment			
Type	Personal Protective Equipment	Description	Required
Dermal Protection	coveralls	Tyvek coveralls	Recommended
	long sleeve shirt/pants		Required
Eye Protection	faceshield		Recommended
	safety glasses		Required
Foot Protection	steel-toe boots		Required
Hand Protection	chemical resistant gloves (specify type)	Nitrile	Required
	work gloves (specify type)	leather	Recommended
Head Protection	hard hat		Required
Miscellaneous PPE	other	Knee pads	Required
	traffic vest--Class II or III		Required

Supplies			
Type	Supply	Description	Required
Communication Devices	mobile phone		Required
Decontamination	Decon supplies (specify type)		Required
Miscellaneous	fire extinguisher		Required
	first aid kit		Required
	flashlight		Required
Personal	eye wash (specify type)	bottle	Required
	insect repellent		Recommended
	sunscreen		Recommended
Traffic Control	barricades		Recommended
	traffic cones		Required