

From: Burnham, Anne <Anne.Burnham@parsons.com>
Sent: Monday, August 10, 2020 8:44 AM
To: Spellman, John (DEC)
Cc: tlbazicek@nyseg.com; DHollander, Ray; Philip, Heather
Subject: RE: NYSEG Auburn Clark CCR, McMaster St. MGP CCR
Attachments: RTCs NYSDEC comments_080420.pdf; Clark NAPL and GW Memo 080520_RLSO combined.pdf; Appendix F Health and Safety Plan.pdf; Appendix G- Community Air Monitoring Plan.pdf

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Good morning John,

Attached is a revised memo for Clark Street and a response to comments document. Additionally, we have included the Health and Safety Appendix as well as the CAMP Appendix for your review, as these apply to the field work for the well installation that will be performed following NYSDEC approval of this plan.

Please let us know if you have any questions or further comments.

Thank you,
Anne

Anne L. Burnham
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From: Spellman, John (DEC) <john.spellman@dec.ny.gov>
Sent: Monday, December 9, 2019 2:57 PM
To: Philip, Heather <Heather.Philip@parsons.com>; tlbazicek@nyseg.com
Cc: DHollander, Ray <ray.dhollander@parsons.com>; Burnham, Anne <Anne.Burnham@parsons.com>; Collins, Taylor <Taylor.Collins@parsons.com>
Subject: [EXTERNAL] RE: NYSEG Auburn Clark CCR, McMaster St. MGP CCR

Hi Heather, Tracy,

Thank you for your proposed plan. The Department of Environmental Conservation has a few questions/comments as noted on the attached.

I am available to discuss.

Regards,

John

John Spellman, P.E.

Project Manager, Remedial Bureau C
Division of Environmental Remediation
New York State Department of Environmental Conservation
625 Broadway, Albany, NY 12233-7014
P: 518-402-9686 | F: 518-402-9679 | john.spellman@dec.ny.gov

From: Philip, Heather <Heather.Phillip@parsons.com>

Sent: Thursday, October 10, 2019 3:46 PM

To: Spellman, John (DEC) <john.spellman@dec.ny.gov>

Cc: DHollander, Ray <ray.dhollander@parsons.com>; Burnham, Anne <Anne.Burnham@parsons.com>; Collins, Taylor <Taylor.Collins@parsons.com>; tlblazicek@nyseg.com

Subject: NYSEG Auburn Clark CCR, McMaster St. MGP CCR

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Good afternoon John,

On behalf of NYSEG, the Auburn Clark Street NAPL and Groundwater well installation plan prepared as a memo is attached for your review. This memo will be attached as Appendix A to the Site SMP and has been developed per the ROD. We would like to proceed with installation before year end if possible, so are submitting this as a standalone document. A McMaster memo will follow in the coming week as well as the Site SMP as a whole after that.

Please let us know if you have any questions!

Regards,
Heather

Heather Philip

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M E M O R A N D U M

August 5, 2020

To: NYSDEC
From: Heather Philip, Parsons Project Manager
Subject: NYSEG Clark St. Former MGP Site (Site No. 7-06-010)
NAPL Collection Well Installation Plan and Groundwater Monitoring

Following the completion of remedial activities at the NYSEG Clark Street Former MGP Site, a bedrock NAPL collection system will be implemented on site as called for in the March 2009 Record of Decision (ROD). Collection wells will be used to recover remaining non-aqueous phase liquid (NAPL) to the extent practical and will support the achievement of the Site remedial goals described in Section 6 of the ROD. Ten NAPL recovery wells will be strategically placed with the goal of maximizing the recovery of NAPL from the bedrock. The NAPL recovery procedures for each well are anticipated to remain in place until negligible quantities (< 0.01 gallons) of NAPL are recovered in three consecutive sampling and collection rounds for that well, as described further below. All work proposed in this memorandum will be conducted in accordance with the health and safety procedures.

NAPL Collection Well Placement

NAPL recovery well locations have been selected based on the results of the multi-year NAPL monitoring program conducted by Arcadis from 2010-2015 (Arcadis, 2012 and Arcadis, 2015) and are expected to optimize NAPL collection at the site.

Measurable quantities of NAPL were recovered from six of the 25 monitoring wells (MW-03B, MW-04B, MW-05B, MW-06B, MW-07B, and MW-11D). The ten proposed bedrock NAPL collection wells will be installed around the perimeter of the upland portion of the site, as shown on Figures 1 and 2 “Site Plan” and “Proposed NAPL Collection Wells,” respectively. Collection wells were proposed in areas where NAPL has historically been observed.

NAPL Recovery Well Construction

Wells will be installed through fractured bedrock zone and will include a 5-foot sump into competent bedrock. The NAPL collection wells will be constructed using 4-inch diameter schedule 40 (SCH-40) polyvinyl chloride (PVC) or stainless-steel riser pipe and 4-inch diameter SCH-40 PVC or stainless-steel screen with 0.050 slot size. The sump will be grouted into competent bedrock and a sand pack will be installed around the screened interval from the competent bedrock interface to one foot above the top of fractured bedrock. The annular space will be sealed with bentonite and grouted with a Portland cement/bentonite slurry. Recovery wells will be constructed in accordance with the specifications detailed on Figure 3 “Recovery Well Detail.”

Following well installation, well construction logs, including visual observations made during installation, will be prepared. Cuttings from well installation, as well as any NAPL/water, will be staged in 55-gallon drums on-site as IDW and characterized/disposed of using the appropriate waste disposal stream.

NAPL Collection and Disposal

NAPL collection at the Site is recommended to occur on a quarterly basis for a two-year period. Following the initial two year period, the frequency may increase, decrease, or remain the same depending on the amount of NAPL being collected. Decisions regarding the frequency of NAPL collection will be made in conjunction with, and approval from, NYSDEC. Recovery wells exhibiting negligible NAPL collection (< 0.01 gallons) during the last three quarters of the initial two-year sampling period will be placed on an annual sampling and collection schedule. If a recovery well exhibits negligible recovery for three consecutive years sampling and collection efforts at that location will cease.

NAPL will be collected from recovery wells using bailers and/or absorbent socks/pads. Recovered NAPL, and products containing NAPL, will be disposed of by a licensed waste hauler and transported off-site for treatment or disposal at an approved facility.

Groundwater Monitoring Well Placement

Six proposed overburden groundwater monitoring wells will be utilized for annual groundwater monitoring on the Site. Existing overburden monitoring well MW-01B is located at the southeastern border of the site and would serve as an upgradient monitoring well. Three bedrock wells north of the Owasco outlet (MW-08D, MW-09D, and MW-10D) will be monitored as historical impacts were noted in these wells. Two additional overburden wells are recommended for installation in the upland portion of the site, serving as downgradient monitoring wells. Following installation of new wells, well construction logs, including visual observations made during installation, will be prepared. The locations of the proposed groundwater monitoring wells are shown on Figure 4 “Proposed Overburden Groundwater Monitoring Wells.”

Groundwater Monitoring Well Sampling

The overburden monitoring well network will be sampled annually according to the Site Management Plan. Groundwater samples will be collected via low-flow techniques and submitted for laboratory analysis of site-specific COCs, i.e. BTEX and PAHs.

At the request of the New York State Department of Environmental Conservation, emergent contaminants (per- and polyfluoroalkyl substances [PFAS] and 1,4 dioxane), samples will be collected during the initial annual monitoring event. Emergent contaminant sampling will be conducted in accordance with the previously approved New York State Emergent Contaminant Field Sampling Plan and Quality Assurance Project Plan prepared and submitted by Parsons (2019).

References

ARCADIS, 2012a. Monthly NAPL Monitoring Program – Annual Report, NYSEG Clark Street Former MGP Site. January 25, 2012.

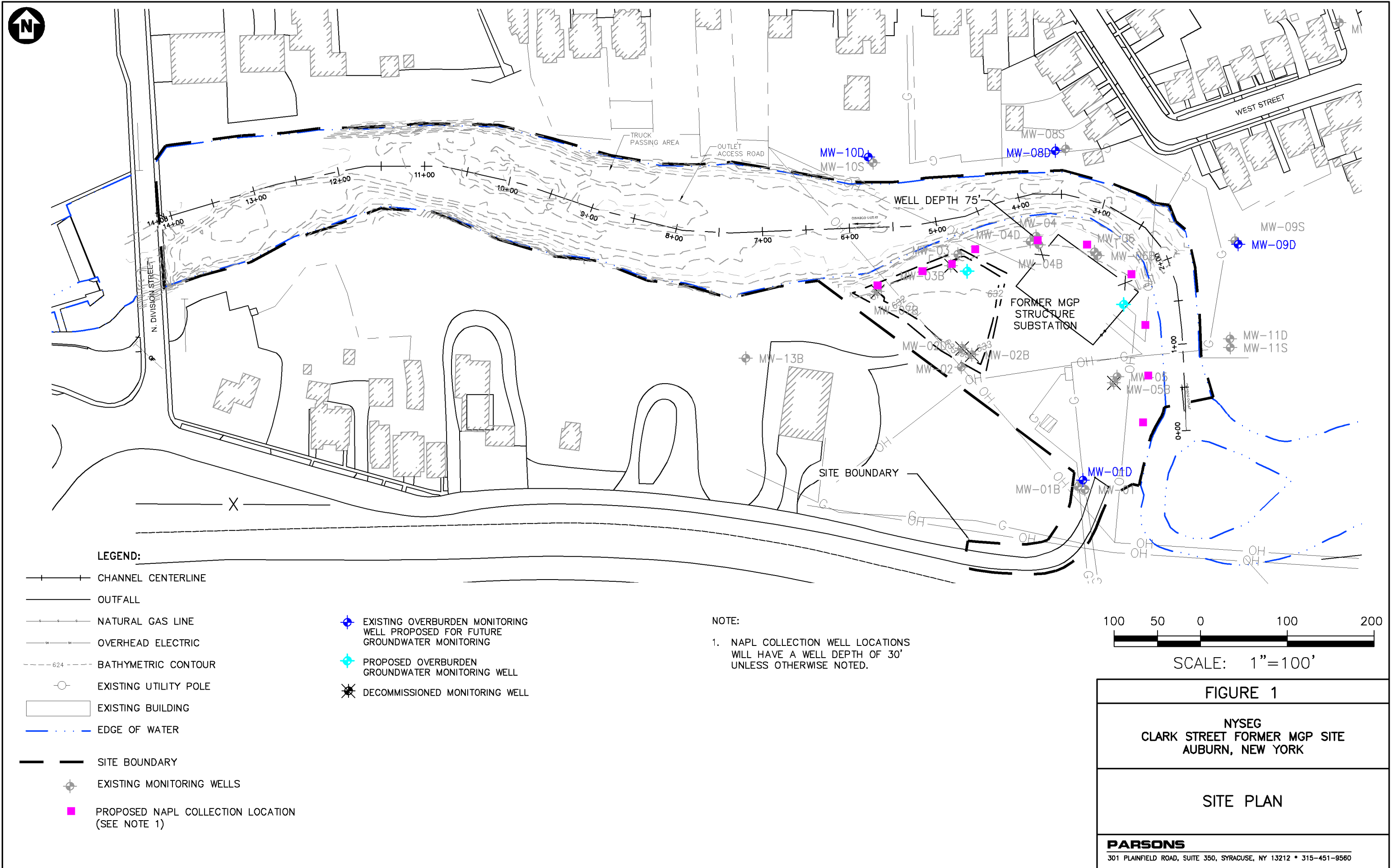
ARCADIS, 2015. NYSEG Clark Street Former MGP Site, Semi- Annual NAPL Monitoring. July 16, 2015.

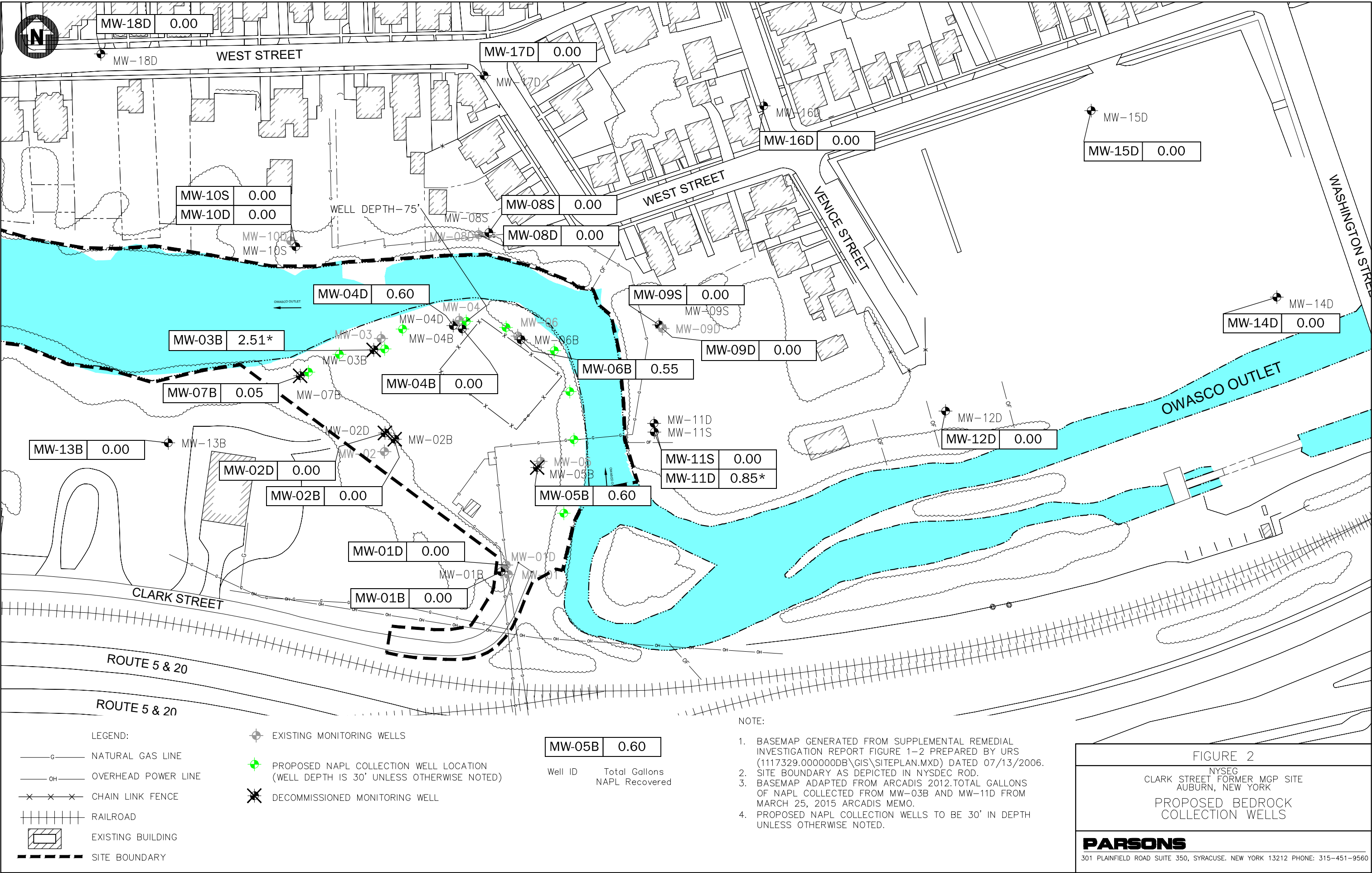
NYSDEC, 2009. Record of Decision, NYSEG Clark Street – Auburn MGP Site, Auburn Cayuga County, NY. Site Number 7-06-008. March 2009.

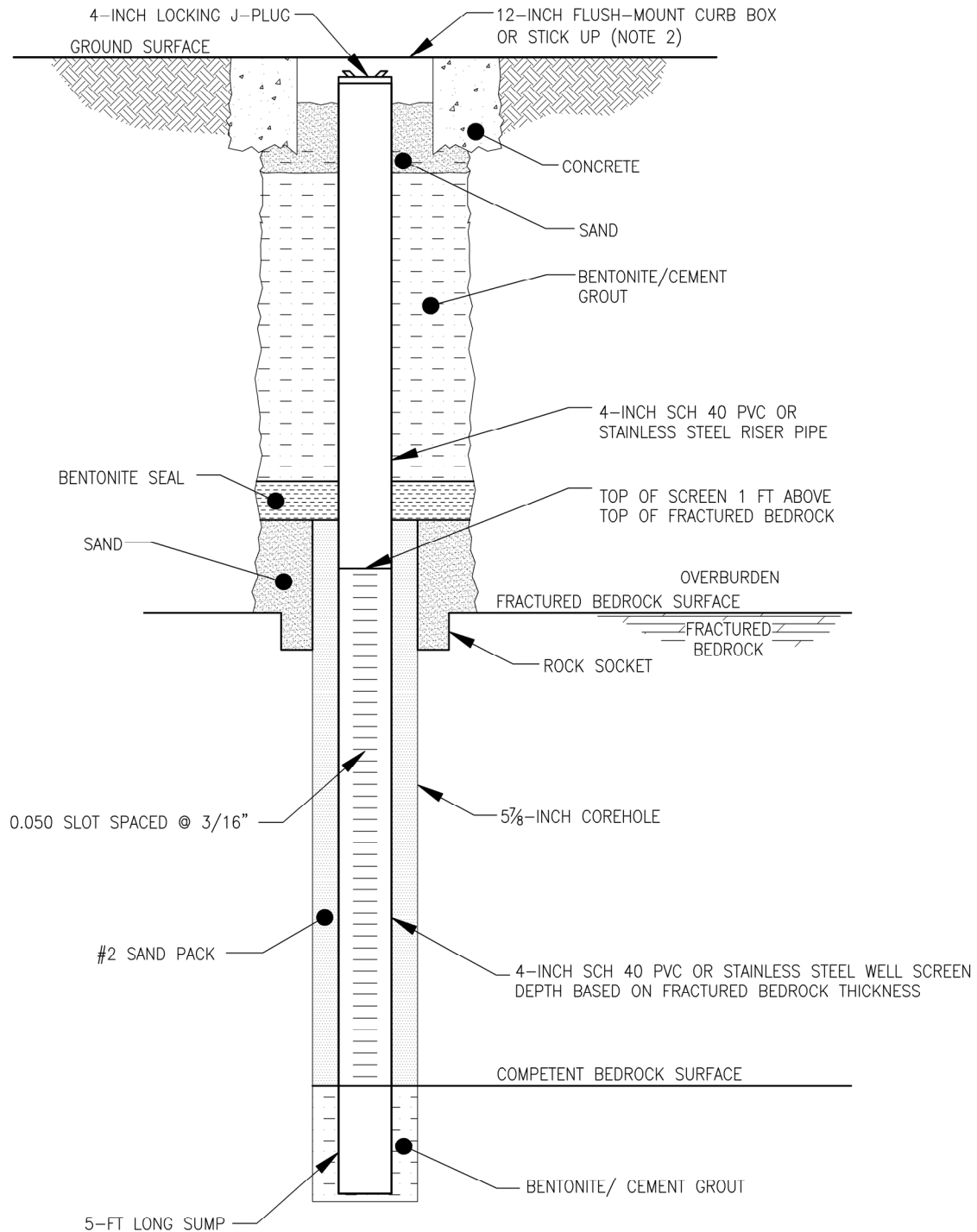
Parsons, 2020, Site Management Plan, NYSEG Clark Street Former MGP Site. DRAFT.

Parsons, 2019. New York State Emergent Contaminant Field Sampling Plan and Quality Assurance Project Plan. September 2019.

FIGURES







**TYPICAL BEDROCK DNAPL
COLLECTION WELL**
NOT TO SCALE

NOTES:

1. DNAPL COLLECTION WELL TO BE INSTALLED BY REMEDIATION ENGINEER (NOT PART OF CONTRACT).
2. GROUTING WILL BE COMPLETED ESSENTIALLY TO GRADE, LEAVING ENOUGH SPACE FOR COMPLETION AS EITHER FLUSH MOUNT OR STICK-UP TO BE DETERMINED IN THE FIELD BASED ON LOCATION.
3. ELEVATION OF COMPETENT ROCK SURFACE TO BE EXTRAPOLATED FROM McMASTERS STREET SOUTH BANK DESIGN TO BE FIELD VERIFIED WITH ROCK CORE FOR FIELD DEVIATION, IF ANY.
4. SLOTTED ZONE TO BE AT LEAST 5 FEET IN LENGTH.

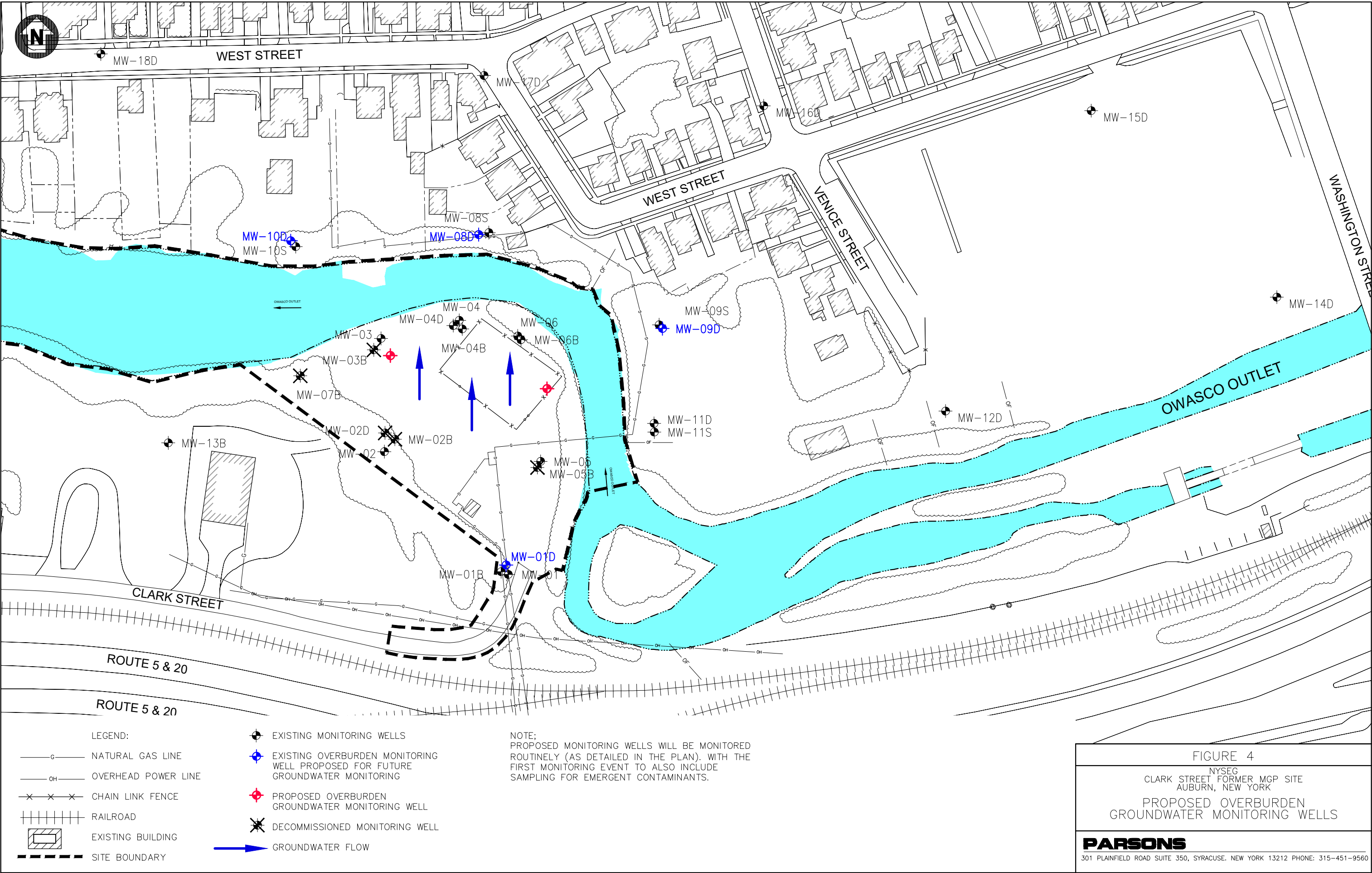
FIGURE 2

NYSEG
CLARK STREET FORMER MGP SITE
AUBURN, NEW YORK

RECOVERY WELL DETAIL

PARSONS

301 PLAINFIELD ROAD, SUITE 350, SYRACUSE, NY 13212 • 315-451-9560



MEMORANDUM

August 5, 2020

To: NYSDEC
From: Heather Philip, Parsons Project Manager
Subject: NYSEG Clark St. Former MGP Site (Site No. 7-06-010)
NAPL Collection Well Installation Plan and Groundwater Monitoring

Following the completion of remedial activities at the NYSEG Clark Street Former MGP Site, a bedrock NAPL collection system ~~must~~will be implemented on site as called for in the March 2009 Record of Decision (ROD-NAPL collection). Collection wells will be used to recover remaining non-aqueous phase liquid (NAPL) to the extent practical, and will support the achievement of the ~~remediation~~Site remedial goals described in Section 6 of the Site ROD. Ten NAPL recovery wells will be strategically placed with the goal of maximizing the recovery of NAPL from the bedrock. ~~We anticipate the~~The NAPL recovery procedures for each well will be anticipated to remain in place until negligible quantities (< 0.01 gallons) of NAPL are recovered in three consecutive sampling and collection rounds for that well, as described further below. All work proposed in this memorandum will be conducted in accordance with the health and safety procedures.

NAPL Collection Well Placement

~~Final~~NAPL collection/recovery well ~~placements~~locations have been selected based on the results of the multi-year NAPL monitoring program conducted by Arcadis from 2010-2015 (Arcadis, 2012)~~), and~~ Arcadis, 2015) and are expected to optimize NAPL collection at the site.

Measurable quantities of NAPL were recovered from six of the 25 monitoring wells (MW-03B, MW-04B, MW-05B, MW-06B, MW-07B, and MW-11D~~)).~~ The ten proposed ~~ten~~ bedrock NAPL collection wells will be installed around the perimeter of the upland portion of the site, as shown on Figures 1 and 2 "Site Plan" and "Proposed NAPL Collection Wells," respectively. Collection wells were proposed in areas where NAPL has historically been ~~found~~observed.

~~These locations of the wells are expected to optimize the recovery of~~ NAPL ~~on Site. The depth of the wells was selected based on the depth of NAPL previously observed in the monitoring wells. Figure 1 "Site Plan"~~Recovery Well Construction

~~Wells will be installed through fractured bedrock zone and Figure 2 "Proposed NAPL Collection Wells" figures show the proposed~~ will include a 5-foot sump into competent bedrock. The ~~NAPL collection well locations~~wells will be constructed using 4-inch diameter schedule 40 (SCH-40) polyvinyl chloride (PVC) or stainless-steel riser pipe and well depths for the Site. 4-inch diameter SCH-40 PVC or stainless-steel screen with 0.050 slot size. The sump will be grouted into competent bedrock and a sand pack will be installed around the screened interval from the competent bedrock interface to one foot above the top of fractured bedrock. The annular space will be sealed with bentonite and grouted with a Portland cement/bentonite slurry. Recovery wells will be constructed in accordance with the specifications detailed on Figure 3 "Recovery Well Detail" figure shows the

Following well installation, well construction of a NAPL collection logs, including visual observations made during installation, will be prepared. Cuttings from well installation, as well as any NAPL/water, will be staged in 55-gallon drums on-site as IDW and characterized/disposed of using the appropriate waste disposal stream.

NAPL Collection and Disposal

~~Quarterly~~ NAPL collection at the Site is recommended at the Site to occur on a quarterly basis for a two-years-year period. Following ~~the initial two years of monitoring year period~~, the frequency ~~can may~~ increase, decrease, or remain the same depending on the amount of NAPL ~~being collected at that point and following discussion.~~ Decisions regarding the frequency of NAPL collection will be made in conjunction with, and approval from, NYSDEC. ~~Wells with Recovery wells exhibiting negligible NAPL recovery in collection (< 0.01 gallons) during the last three quarters of the first initial two-years-year sampling period will be placed on an annual sampling and collection schedule. If they have a recovery well exhibits negligible recovery for three consecutive years, sampling and collection will be terminated efforts at that location. The recommended frequency will be discussed in the Revised SMP. It is proposed that cease.~~

NAPL will be ~~removed~~ collected from ~~the collection~~ recovery wells using bailers and/or absorbent socks ~~and/or pads~~. Recovered NAPL, and products containing NAPL, will be ~~removed during collection and~~ disposed of by a licensed waste hauler and transported off-site for treatment or disposal at an approved ~~off-site~~ facility.

Groundwater Monitoring Well Placement

~~A~~ Six ~~proposed three~~ overburden groundwater monitoring wells will be utilized for annual groundwater monitoring on the Site. Existing overburden monitoring well MW-01B is located at the ~~south eastern~~ southeastern border of the site and would serve as ~~the an~~ upgradient monitoring well. ~~A~~ Three bedrock wells north of the Owasco outlet (MW-08D, MW-09D, and MW-10D) ewill be monitored as historical impacts were noted in these wells. Two additional ~~two~~ overburden wells are recommended ~~to be installed for installation~~ in the upland portion of the site, serving as ~~the~~ downgradient monitoring wells. Following installation of new wells, well construction logs, including visual observations made during installation, will be prepared. The locations of the proposed groundwater monitoring wells are shown on Figure 4 "Proposed Overburden Groundwater Monitoring Wells" shows the proposed locations of the groundwater monitoring wells."

Groundwater Monitoring Well Sampling

The overburden monitoring well network will be sampled annually according to the Site Management Plan. Groundwater samples will be collected via low-flow techniques and submitted for laboratory analysis of site-specific COCs, i.e. BTEX and PAHs.

At the request of the New York State Department of Environmental Conservation, emergent contaminants (per- and polyfluoroalkyl substances [PFAS] and 1,4 dioxane), samples will be collected during the initial annual monitoring event. Emergent contaminant sampling will be conducted in accordance with the previously approved New York State Emergent Contaminant Field Sampling Plan and Quality Assurance Project Plan prepared and submitted by Parsons (2019).

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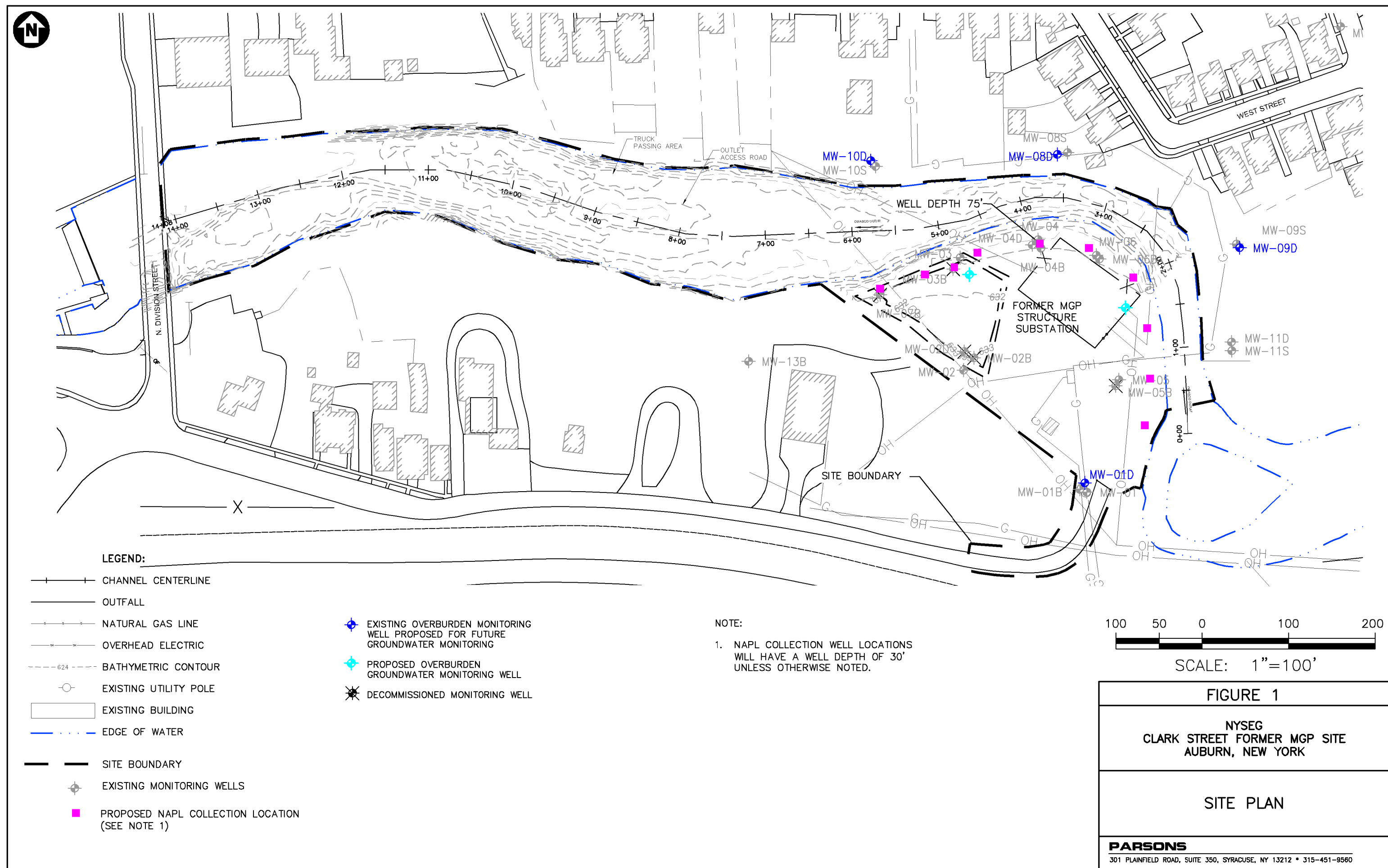
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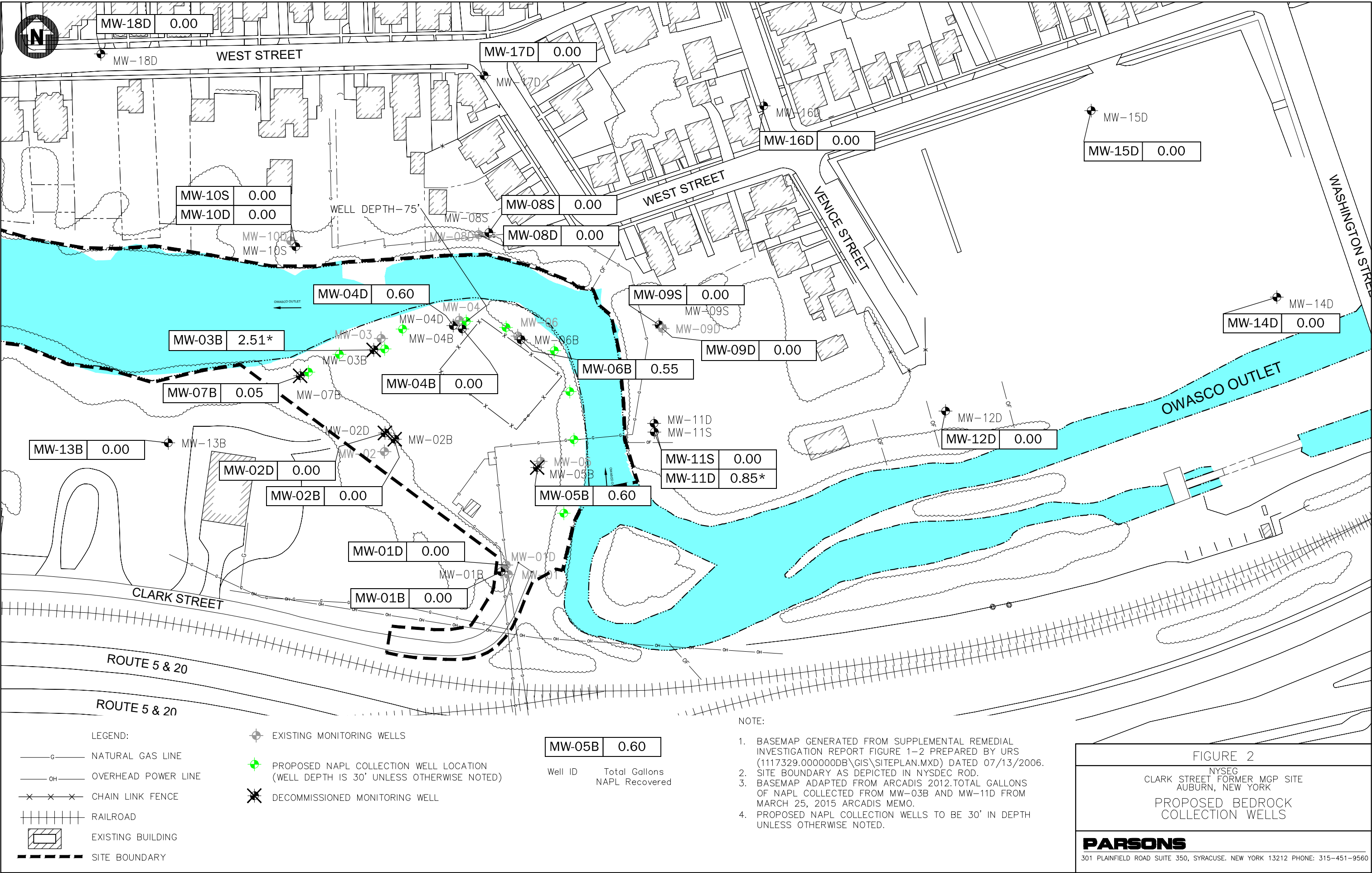
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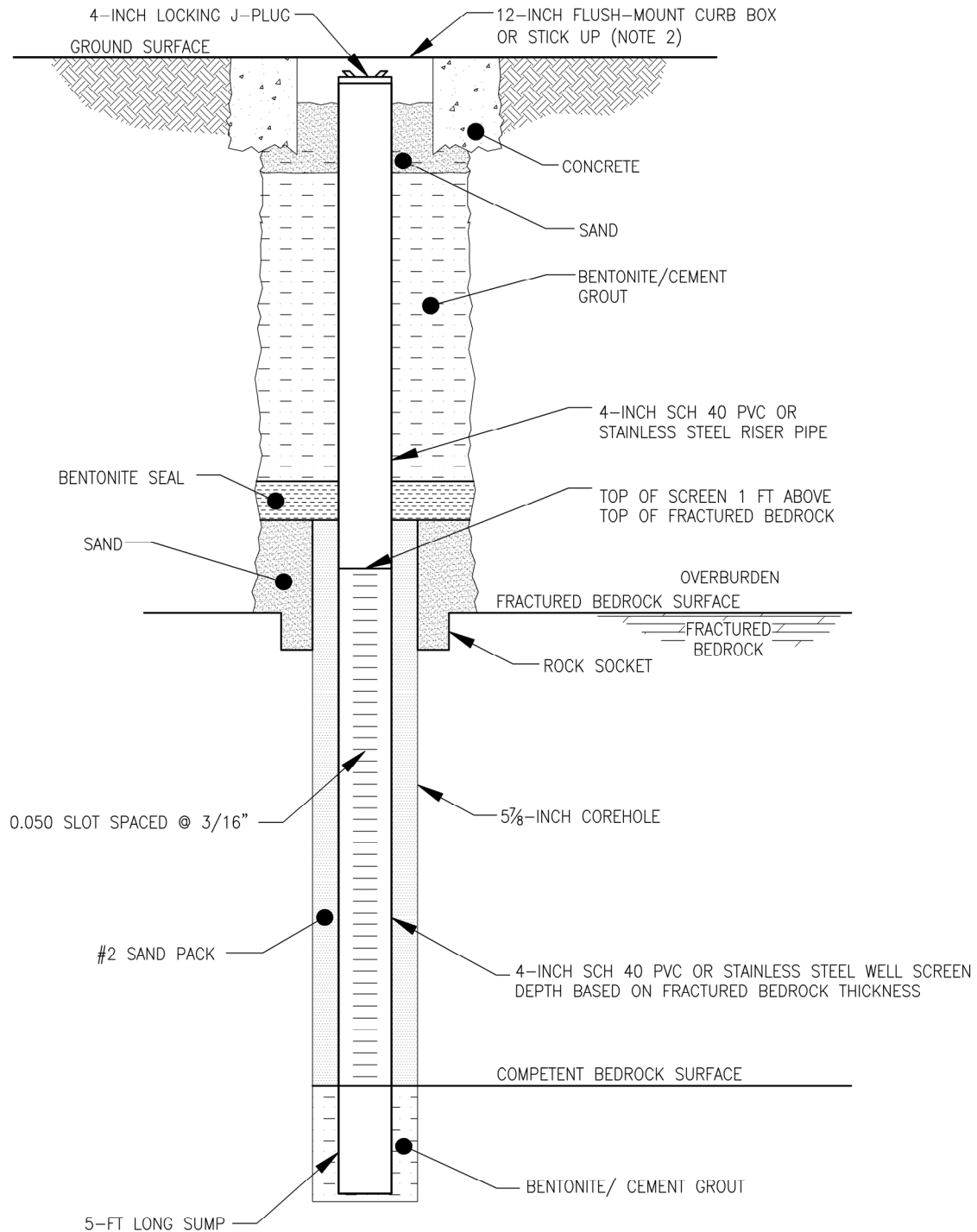
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Parsons, 2019. New York State Emergent Contaminant Field Sampling Plan and Quality Assurance Project Plan. September 2019.

FIGURES







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FIGURE 3

NYSEG
CLARK STREET FORMER MGP SITE
AUBURN, NEW YORK

RECOVERY WELL DETAIL

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