



Mr. William Ports  
New York State Department of Environmental Conservation  
Division of Environmental Remediation  
625 Broadway  
Albany, New York 12233-7014

Subject:  
NYSEG - Cortland-Homer Former MGP Site  
Tioughnioga River - Sediment Assessment Work Plan  
Homer, New York

Dear Mr. Ports:

This letter presents NYSEG's proposed Tioughnioga River Sediment Assessment Work Plan for the Cortland-Homer former manufactured gas plant (MGP) site located in Homer, New York. The objective of the work is to reassess the quality of sediments in the Tioughnioga River upstream, adjacent to, and downstream from the subject site. The work will consist of checking observations of MGP-related impacts documented approximately 10 years ago in the 2003 Supplemental Remedial Investigation Report (SRI). This work will assess whether the regions of affected sediments documented in the 2003 SRI Report still exist.

A discussion of the proposed work activities is provided below.

### **Sediment Probing and Reconnaissance**

Sediment probing and reconnaissance will be conducted along the same reach of the Tioughnioga River that was investigated during the SRI (Figure 1). This area extends from approximately 900 feet upstream from the site to approximately 4,000 feet downstream from the site at the sediment trap near the confluence with Dry Creek. Spot probing will be completed along this entire reach of the river. Additionally, probing will be conducted at all sampling locations that were previously observed to contain visual MGP-related impacts. Visually impacted sediment sampling locations identified during the SRI are shown on Figure 1 as orange filled circles. Approximately 25% of other previous probing/sediment sampling locations (where visual MGP-related impacts were not observed) will also be revisited and probed. If impacts (i.e., staining, sheen or NAPL) are observed at any probing location, additional probing will expand out radially from that point to attempt to define the approximate extent of impacts.

### **Imagine the result**

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ENVIRONMENT

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Our ref:  
B0013124 #2.04

Probing will be performed by manually pushing a 1/2-inch diameter steel rod until the rod cannot be advanced further. Water depth, sediment thickness, general sediment description (by sight and feel), and any observed impacts produced by the probing will be recorded in the field log book and photo-documented as necessary. The actual density of spot probing will be determined in the field based on the homogeneity of the river bottom and observed impacts. A hand auger may also be used to penetrate sediments if the probe rod is ineffective. In addition to probing, the assessment will include manually overturning rocks, cobbles, and/or debris to determine if potential MGP-related materials are present beneath these objects. The assessment will also document the presence of outfall pipes and groundwater seeps.

All probing locations, as well as any newly-identified outfalls and/or seeps will be surveyed using a survey-grade global positioning system (GPS) device.

### **Schedule and Reporting**

The field work will be scheduled after receipt of written approval of this work plan from the New York State Department of Environmental Conservation (NYSDEC). NYSEG plans to conduct the work in the fall of 2012 and anticipates the work will require approximately one week to complete. For a variety of reasons, it would be best to conduct the work while the river is at a relatively low stage; therefore, the work schedule will be partially dependent on antecedent weather conditions.

A letter report will be submitted to the NYSDEC approximately one month after the fieldwork has been completed. The purpose of the letter report will be to provide the NYSDEC with the results of the assessment so that NYSEG and the NYSDEC can mutually agree on a path forward for the river component of the site. The letter report will include:

- A summary of the sediment assessment activities including, field observations and other pertinent information necessary to document the assessment.
- Summary table presenting probing results.
- One figure depicting sediment probing locations.
- A discussion of the distribution of impacted sediment, if observed, including approximate horizontal delineation.
- Recommendations for subsequent activities, if necessary.

NYSEG proposes to hold a conference call or meeting with NYSDEC to discuss the results of the assessment once the NYSDEC has had an opportunity to review the letter report.

Please feel free to contact Tracy Blazicek (NYSEG) at 607.762.8839 or me at 315.671.9379 if you have any questions or comments.

Sincerely,

ARCADIS of New York, Inc.



David A. Cornell, P.G.  
Senior Geologist

Attachment

Copies:

Keith White, C.P.G., ARCADIS  
Tracy Blazicek, CHMM, NYSEG

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