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February 25, 2010

Mr. Larry A. Rosenmann
New York State Department of Environmental Conservation
Bureau of Hazardous Waste & Radiation Management
Division of Solid & Hazardous Materials
625 Broadway
Albany, New York 12233-7528

Re: Carrier Corporation, Thompson Road Facility, Syracuse, New York
Corrective Action Order — Index CO 7-20051118-4
Phase 2 PCB Source Investigation Work Plan

Dear Mr. Rosenmann:

Please find enclosed one hard copy of the *Phase 2 PCB Source Investigation Work Plan* for the referenced facility. The work plan addresses comments made by NYSDEC in your January 21, 2010 correspondence on the *Potential PCB Source Report* (Carrier, December 2009).

Please call me if you have any questions at (615) 255-9300.

Sincerely,

EnSafe Inc.

May M Heflin

By: May Heflin, PE

Encl. Phase 2 PCB Source Investigation Work Plan

cc (electronic copy only):
Ms. MJ Peachey — NYSDEC Regional Engineer
Mr. Tim Diguilio — NYSDEC Region 7, Syracuse
Mr. James Gruppe — NYSDEC Region 7, Syracuse
Ms. Sandy Lizlovs — NYSDEC Region 7, Syracuse
Ms. Rebecca Quail — NYSDEC Bureau of Habitat, Albany
Ms. Susan Edwards — NYSDEC Division of Environmental Remediation
Mr. Dare Adelugba — NYSDEC Division of Water, Albany
Mr. Samuel Ezekwo — USEPA Region 2
Mr. William Penn — UTC
Mr. Nelson Wong — Carrier Corporation

PHASE 2 — PCB SOURCE INVESTIGATION WORK PLAN

UNITED TECHNOLOGIES/CARRIER
THOMPSON ROAD FACILITY
SYRACUSE, NEW YORK

EnSafe Project Number
0888808318

Revision No.: 0

Prepared for:

United Technologies Corporation
UTC Shared Remediation Services
United Technologies Building
Hartford, Connecticut 06010

Prepared by:

EnSafe Inc.
220 Athens Way, Suite 410
Nashville, Tennessee 37228
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February 2010

PHASE 2 — PCB SOURCE INVESTIGATION WORK PLAN

UNITED TECHNOLOGIES/CARRIER
THOMPSON ROAD FACILITY
SYRACUSE, NEW YORK

EnSafe Project Number
0888808318

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220 Athens Way, Suite 410
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February 2010

Prepared By:

May M. Heflin, PE

February 25, 2010
Date

Reviewed By:

Thomas B. Green, Jr., Associate Principal

February 25, 2010
Date

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EXECUTIVE SUMMARY

Carrier Corporation (Carrier), a wholly-owned subsidiary of United Technologies Corporation, is currently working through Corrective Action Order — Index CO 7-20051118-4 (order) dated February 13, 2006, with the New York State Department of Environmental Conservation (NYSDEC) to identify potential sources of polychlorinated biphenyls (PCBs) in storm water effluent at Outfall 002. Carrier prepared a *Potential PCB Source Work Plan, September 2009,* and implemented the activities described therein in October, November, and December 2009.

A *Potential PCB Sources Report* (Carrier, 2009) detailing the findings of the investigations was submitted to NYSDEC in December 2009. A summary of the findings is listed below.

- Runoff from the central and southern sections of the Building TR-1 roof contains PCBs and therefore appears to represent a continuing source of PCBs to storm water.

- Runoff from portions of the central, western, and northern sections of the Building TR-2 roof contain PCBs, and therefore this roof appears to represent a continuing source of PCBs to storm water.

- Surface water runoff samples collected from the Transformer Yard Area contain PCBs and therefore the runoff may represent a continuing source of PCBs to storm water.

- The Thompson Road and TR-18 storm sewer lines in the Outfall 002 drainage basin — in particular those lines in the Transformer Yard Area — appear to serve as a continuing source of PCBs to storm water; though it is unlikely that the storm lines are the original source of contamination. Historically, PCBs may have been discharged within the area served by these storm lines, or contaminated sediments may have been washed into the storm lines during rain events and accumulated over time.

- Subsurface soils from MH-126 and TR-23 areas do not appear to represent a continuing source of PCBs to storm water.

NYSDEC requested that work plans be prepared to describe Carrier's approach on the proposed actions and/or investigations. This work plan describes Carrier's approach on continued PCB source investigations at the site.

1.0 POTENTIAL SOURCE AREA: DRAINAGE BASIN 002 ROOF RUNOFF

1.1 Summary of Past Investigations

Data obtained during the roof runoff sampling program (July through November 2009) indicates storm water from some roof areas of Buildings TR-1 and TR-2 contains PCB at concentrations greater than 0.065 micrograms per liter (µg/L). A summary of these findings are included in the *Potential PCB Sources Report,* (Carrier, December 2009), previously submitted to New York State Department of Environmental Conservation (NYSDEC). Based on this data, some portions of the building roofs may represent a continuing source of polychlorinated biphenyl (PCBs) to storm water.

1.2 Proposed Sampling Activities

Because runoff from portions of the roofs of Buildings TR-1 and TR-2 contained Aroclors 1242, 1254, and 1260, runoff from other roof areas in this drainage basin will be tested for PCBs to determine if they represent a continuing source of PCBs to storm water. These buildings include TR-6, TR-7, TR-8, TR-10, TR-10A, TR-10B, TR-11, TR-12, TR-12A, TR-13, TR-14, TR-18, TR-18S, TR-23, the domestic water pump house, and the jet fuel pump building. By comparison, these 16 buildings are small, ranging in size from 350 square feet to just less than 1 acre. **Table 1-1** summarizes several building characteristics.

Table 1-1
Drainage Basin 002 Buildings Proposed for Runoff Sampling

	Building ID	Approximate Roof Area (ft^2)	Other Comments
1.	TR-6	14,000	Last year roofed — 1987. Roof drains leading from the roof down into the building along support columns and directly into the TR-18 storm line
2.	TR-7	13,200	Last year roofed — 1976.
3.	TR-7A	15,600	Last year roofed — 1997.
4.	TR-8	37,300	Last year roofed — 1982.
5.	TR-10	15,300	Last year roofed — 10N 1997; 10M 1968; 10S 1953.
6.	TR-10A	350	Last year roofed — 1968? Tar-roof construction
7.	TR-10B	350	Last year roofed — 1968? Tar-roof construction
8.	TR-11	6,500	Last year roofed — 11N 1968?; 11M 1997; 11S 1968
9.	TR-12	3,800	Last year roofed — 1968?
10.	TR-13	900	Last year roofed — 1968?
11.	TR-14	1,200	Last year roofed — 1968? Roof drains leading from the roof down the side of the building in gutters that are connected directly to the TR-18 storm line
12.	TR-18	12,400	Last year roofed — 1995
13.	TR-18S	17,600	Last year roofed — 18SN 1972; 18SS 1979
14.	TR-23	4,800	Last year roofed — 1980/92
15.	Domestic Water Pump House	900	Last year roofed — 1968? Located just west of MH-97 Tar-pebble and/or tar-paper construction
16.	Old Jet Fuel Pump Building	900	Last year roofed — 1968? Located just east of MH-256 Tar-pebble and/or tar-paper construction

Note: N = North, M = Middle, S = South

Runoff samples will be collected during two rain events. Because of their relatively small size and homogeneous roof construction and/or repair features, one (1) runoff sample will obtained from each building. Three (3) samples will be obtained from Buildings TR-10 and TR-11 because the north, middle and south sections were re-roofed in differing years. The number of samples may be increased if field observations indicated varying roofing materials were used on a single building. Samples will be submitted to TestAmerica Laboratories, Inc., (TestAmerica) Shelton, Connecticut (New York Certification 10602), for Total PCB analysis using USEPA Method 608.

Rainfall runoff samples (not snow melt runoff) will be taken at the inlet to a roof leader that ultimately carries runoff to the site-wide storm lines. If a roof leader is not part of the runoff collection configuration, a sample will be obtained at a suitable location prior to mixing with storm water runoff from other areas onsite (i.e., a sample may be obtained from the inlet pipe to a storm line manhole). **Figure 1-1 — Drainage Basin 002, Proposed Roof Runoff Sampling Locations** shows the building roof configurations and proposed sampling points. These locations may be changed in the field based on the runoff collection configuration and other factors.

1.3 Health and Safety Plan

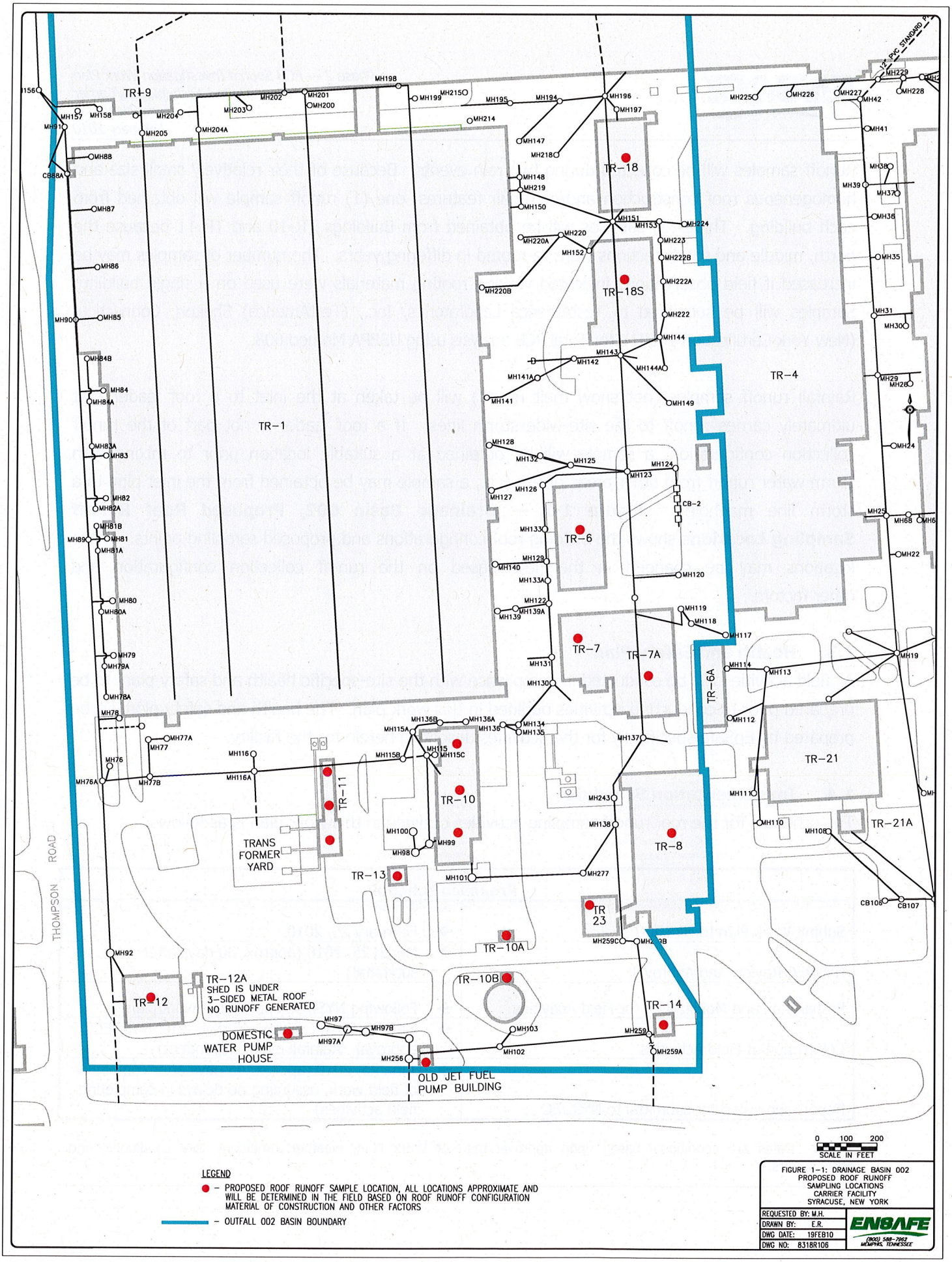
All field activities will be conducted in compliance with the site-specific health and safety plan, to be prepared prior to conducting activities outlined in this work plan. The health and safety plan will be prepared by EnSafe specifically for the activities described herein for the facility.

1.4 Implementation Schedule

The schedule for the roof runoff sampling activities outlined in this work plan is as follows:

Proposed Schedule	
Submit Work Plan to NYSDEC	→ February 25, 2010
NYSDEC Review and Approval	→ March 25, 2010 (approx. 30 days after submittal)
Preparation and Mobilization for Field Activities	→ Following NYSDEC approval of work plan
Completion of Field Activities	→ May 10, 2010 (approx. 45 days after NYSDEC approval. Rainfall event dependent)
Report generated for submittal to NYSDEC	→ June 25, 2010 (approx. 45 days after completion of field work, assuming no delays in completing field activities)

Note: Dates are conditional based upon approval date of Work Plan, weather conditions, site conditions, and other factors.



LEGEND

● – PROPOSED ROOF RUNOFF SAMPLE LOCATION, ALL LOCATIONS APPROXIMATE AND WILL BE DETERMINED IN THE FIELD BASED ON ROOF RUNOFF CONFIGURATION MATERIAL OF CONSTRUCTION AND OTHER FACTORS

– OUTFALL 002 BASIN BOUNDARY

FIGURE 1-1: DRAINAGE BASIN 002
PROPOSED ROOF RUNOFF
SAMPLING LOCATIONS
CARRIER FACILITY
SYRACUSE, NEW YORK

REQUESTED BY:	M.H.
DRAWN BY:	E.R.
DWG DATE:	19FEB10
DWG NO:	8318R106

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MEMPHIS, TENNESSEE

2.0 SOURCE ACTION AREA: TRANSFORMER YARD AREA

Based on a review of site operations and history, the Transformer Yard (Area of Concern D in Table 1 of the Corrective Action Order — Index CO 7-20051118-4 [order]) was identified as a location of PCB releases to the storm water system. Therefore, it was identified as a potential source of PCB contamination in storm water runoff in the work plan and was an area of focus during the October through December 2009 site investigation. A *Potential PCB Sources Report*, (Carrier, 2009) which includes a summary of findings of this investigation, was submitted to NYSDEC in December 2009.

2.1 Surface Water Runoff Sampling

Summary of Field Investigation Findings: The surface runoff samples from the west and the north sides of the Transformer Yard Area (outside the fence) obtained as part of the 2009 investigation contained PCBs (sample was stirred to suspend sediments). It is possible that PCB-contaminated soils or sediments (gravel dust) are being eroded by surface water runoff and transported to the storm water system.

Proposed Activities: To better understand the potential PCB migration pathway(s) to surface water, and possibly define the area contributing PCBs to surface water runoff, Carrier will obtain up to 6 additional surface water runoff samples on the west side of the Transformer Yard and inside the fenced area at the locations indicated in **Figure 2-1 — Proposed Surface Water and Surface Soil Sampling Locations**. Surface runoff samples will be obtained by using a filter sock to pond water at rivulets and gullies formed by overland flow conditions. Unlike the procedure requested by DEC during the 2009 investigation, the ponded water will not be stirred to suspend solids intentionally. The surface soil samples obtained as described in Section 2.2 will provide more representative and accurate data with regard to PCBs in surface soils. Samples will be submitted to TestAmerica Laboratories, Inc., (TestAmerica) Shelton, Connecticut (New York Certification 10602), for Total PCB analysis using U.S. Environmental Protection Agency (USEPA) Method 608.

2.2 Surface Soil Sampling

Summary of Field Investigation Findings: Analytical data from four (4) shallow subsurface soil samples taken on the west side of the Transformer Yard Area (outside the fence) as part of the 2009 investigation were estimated (J-flagged) values and all were less than the NYSDEC recommended soil cleanup objective for surface and subsurface soils of 1 milligram per kilogram (mg/kg) and 10 mg/kg, respectively (*TAGM 4046 — Table 3, Recommended Soil Cleanup Objectives [mg/kg or ppm], Organic Pesticides/Herbicides and PCBs.*) Shallow hand-augered soil samples were obtained from these locations at a 0- to 1-foot sample interval. Typically, the soil sample was obtained from the lower portion of the sample interval (6- to 12-inch section), which represented a section free of vegetative matter. It is not suspected that these subsurface soils are contributing PCBs to storm water.

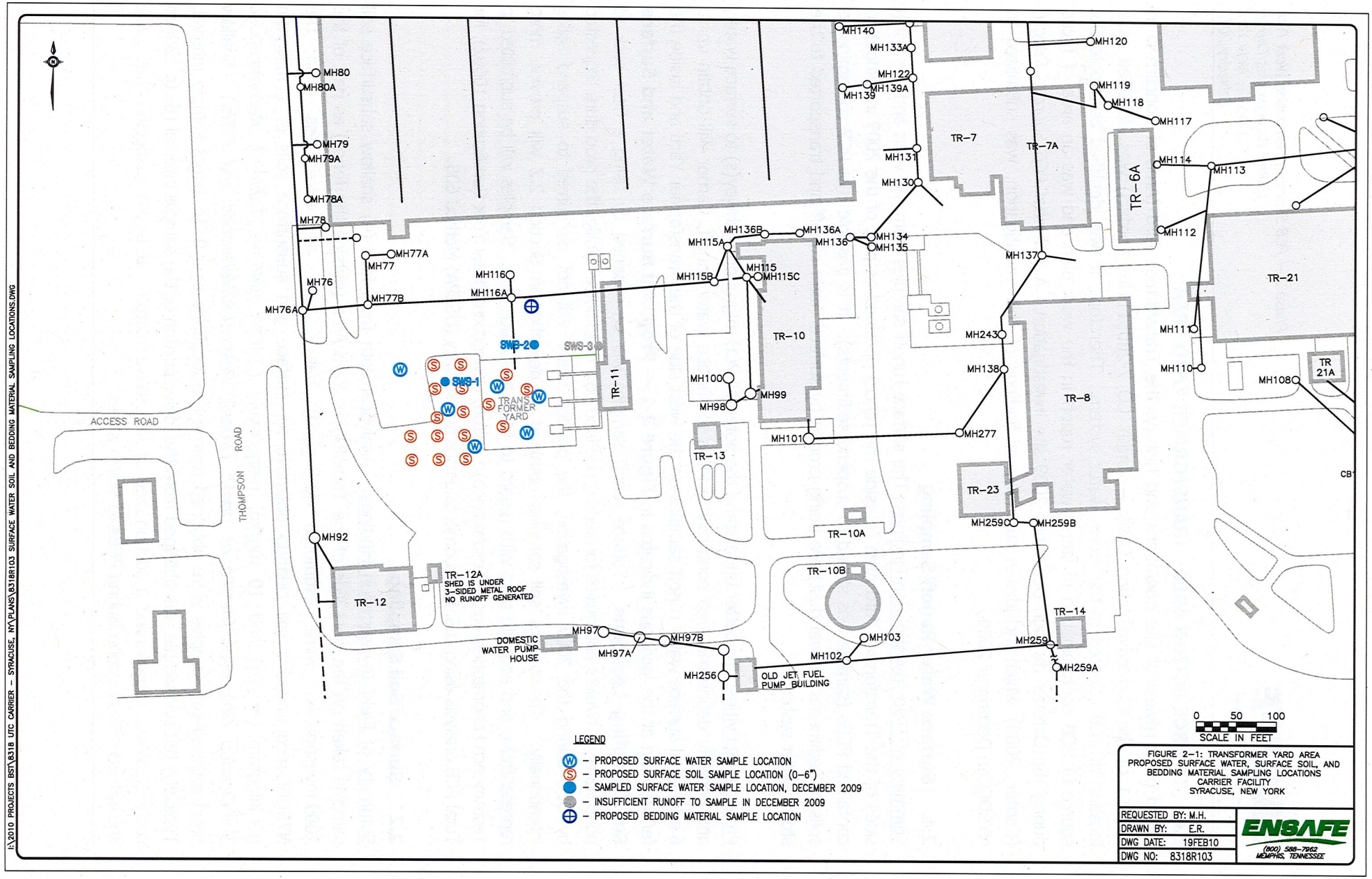

FIGURE 2-1: TRANSFORMER YARD AREA
PROPOSED SURFACE WATER, SURFACE SOIL, AND BEDDING MATERIAL SAMPLING LOCATIONS
CARRIER FACILITY
SYRACUSE, NEW YORK

REQUESTED BY:	M.H.
DRAWN BY:	E.R.
DWG DATE:	19FEB10
DWG NO:	8318R103

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MEMPHIS, TENNESSEE

Proposed Activities: Carrier will resample this area with the focus of the sample interval shifting to surface soils (i.e., 0- to 6-inch interval) so that the migration pathway of PCBs to surface water runoff can be assessed (**Figure 2-1**). Surface soil (or gravel dust) samples will be obtained using a stainless-steel trowel to scrape along the surface at the sample point until sufficient material has been recovered for PCB analysis. Material will not be obtained deeper than 6 inches below ground surface (bgs). If grass covers the area to be sampled, the trowel will be used to scrape away the grass, and the surface soils and possibly grass roots will be scraped into the sample jar. All samples will be submitted to Accutest Laboratories, Dayton, New Jersey (New York Certification 11791), for Total PCB analysis using USEPA Method 8082.

2.3 Transformer Yard Storm Line Bedding Material

Summary of Investigation Findings: The October/November 2009 video inspection of these lines confirmed a moderate amount of deterioration in the storm lines, though it did not capture images of sediments actively migrating into the storm lines.

Proposed Activities: One boring will be advanced at the Transformer Yard storm line at the approximate location shown on **Figure 2-1,** for the collection of bedding material sample(s). This boring is located at the area identified during the October 2009 video inspection to be blocked and contain a significant amount of sludge. Carrier has selected this location for bedding material sampling due to the liquid nature of the materials that have accumulated there and its proximity to the transformer yard.

Carrier will develop a strategy to address the concerns associated with the storm line once all of the data has been obtained and evaluated.

Drilling will be performed using direct-push technology (DPT). A sampling description using this method is included as **Appendix A.** All samples will be submitted to Accutest Laboratories for Total PCB analysis using USEPA Method 8082.

2.4 Transformer Yard Area Storm Lines

Summary of Field Investigation Findings: Storm line cleaning and video inspection of the storm lines in the Transformer Yard Area in October/November 2009 showed a moderate amount of deterioration, with some buildup of sediment and sludge in portions of the line. Much of the storm line was inaccessible due to blockages (debris and/or sediment accumulations) even after pressure washing.

Proposed Activities: Carrier will attempt to remove the sludge from the section of pipe just east of MH-116 (as indicated by the green oval on **Figure 2-2 — Area of Storm Line Proposed for Action/Evaluation**). The field work planned for the Transformer Yard Area storm lines will be limited to this location, which Carrier has selected based on the liquid nature of the materials that have accumulated there.

Previously, a jetter with a pressure of 3,000 to 4,000 pounds per square inch (psi) was used to clean these lines. Carrier will conduct a pilot test using a higher-powered jetter (up to 10,000 psi) and grappling hooks to remove accumulated sediment and other debris. If the pilot test is successful, Carrier will consider this line cleaning tool, along with other methods, for other areas of the storm water lines, following the completion of upgradient source control measures.

The subcontractor will mobilize two pieces of equipment — a pressure-washer at the most upgradient manhole and a vacuum truck with hose extension at the next manhole down the line. Before cleaning begins, a sewer line plug will be placed in the outlet pipe of the downstream manhole. Wash water (aided by grappling hooks, as needed) will remove sediment, debris, and sludge, and will flow along the storm line and pool in the sump of MH-116.

A vacuum truck will immediately remove the wash water preventing it from migrating down the line. Wash water and sediment will be temporarily held in the vacuum truck until the water fraction can be decanted to a frac storage tank. The sludge fraction from the vacuum truck and any settled solids in the frac tank will be drummed for later waste characterization (PCB and volatile organic compound [VOC] analysis). Similarly, the water fraction in the frac tank will be tested for PCBs and VOCs to determine the appropriate disposal method.

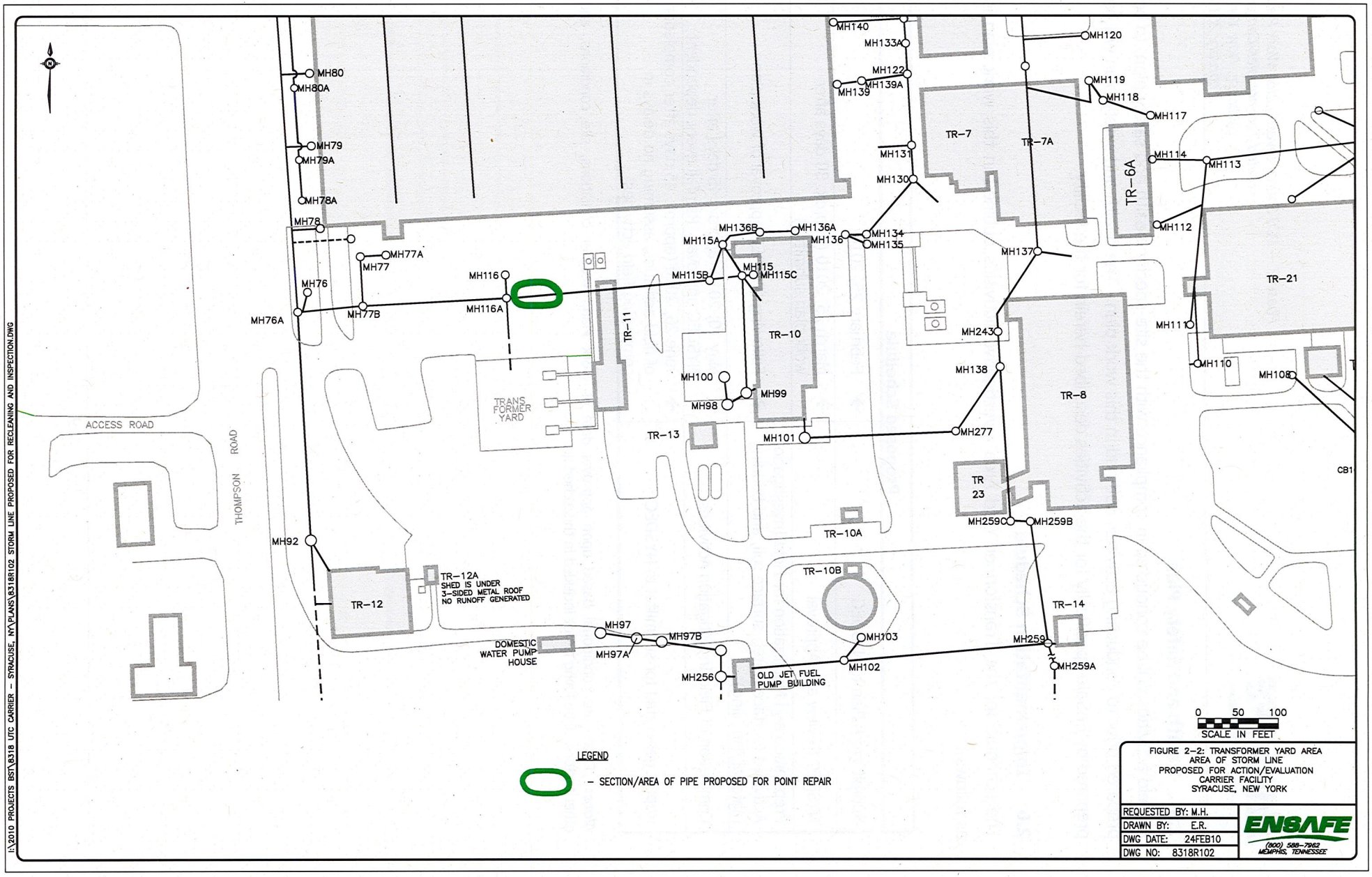

FIGURE 2-2: TRANSFORMER YARD AREA
AREA OF STORM LINE
PROPOSED FOR ACTION/EVALUATION
CARRIER FACILITY
SYRACUSE, NEW YORK

REQUESTED BY:	M.H.
DRAWN BY:	E.R.
DWG DATE:	24FEB10
DWG NO:	8318R102

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MEMPHIS, TENNESSEE

I:\2010 PROJECTS BST\8318 UTC CARRIER – SYRACUSE, NY\PLANS\8318R102 STORM LINE PROPOSED FOR RECLEANING AND INSPECTION.DWG

2.5 Health and Safety Plan

All field activities will be conducted in compliance with the site-specific health and safety plan, to be prepared prior to conducting activities outlined in this work plan. The health and safety plan will be prepared by EnSafe specifically for the activities described herein for the facility.

2.6 Implementation Schedule

The schedule for the Transformer Yard Area investigative activities outlined in this work plan is as follows:

Proposed Schedule	
Submit Work Plan to NYSDEC	→ February 25, 2010
NYSDEC Review and Approval	→ March 25, 2010 (approx. 30 days after work plan submittal)
Preparation and Mobilization for Field Investigation Activities (surface water, surface soil, and bedding material sampling)	→ Following NYSDEC approval of work plan
Completion of Field Investigation Activities	→ May 10, 2010 (approx. 45 days after NYSDEC approval. Rainfall event dependent)
Report generated for submittal to NYSDEC	→ June 25, 2010 (approx. 45 days after completion of field activities, assuming no delays in completing field activities)

Note: Dates are conditional based upon approval date of Work Plan, weather conditions, site conditions, and other factors. Pipe lining is not included in this schedule.

3.0 SOURCE ACTION AREA: THOMPSON RD and TR-18 STORM LINES

3.1 Summary of Past Investigations

Historic sediment sampling of storm water lines/manholes indicated the presence of materials in the storm lines that may represent a continuing source of PCBs. Therefore, during the October 2009 investigation, sediments were sampled from select onsite manholes to investigate whether the storm lines represented a continuing source of PCBs to storm water. A *Potential PCB Sources Report*, (Carrier, 2009) which includes a summary of findings of this investigation, was submitted to NYSDEC in December 2009.

Summary of Field Investigation Findings: Sediment samples were obtained from 15 manholes along the TR-18 and Thompson Road storm lines. Data indicate the presence of PCB-containing sediments in the storm lines that appear to represent a continuing source of PCBs to storm water, though it is unlikely that the storm lines are the original source of contamination. It is assumed that over the site's history, PCBs washed into the storm lines, including the laterals, during rain events, and contaminated sediments have accumulated over time.

Proposed Action — Thompson Road Storm Line (MH-81/82 Area): Table 3-1 summarizes the historical Aroclor 1260 detections in sediment samples from manholes along the west side of Building TR-1.

Table 3-1
Aroclor 1260 Found in Sediment Samples, Thompson Road Line, West Side of TR-1
(all results in mg/kg)

Sample Location	Date Sampled	Aroclor 1260
MH-80 & 81 (composite)	November 2002	64
MH-81	September 2003	0.12
MH-82	October 2003	10.0
	October 2009	1.7
MH-89	October 2003	23.0
	October 2009	79.3

These manholes (MH-80, 81 & 82) have been identified as a potential historical source of PCBs due to the higher levels of PCBs found in the sediments of manholes in this area.

The work plan for the Manhole 81/82 Area includes the following sampling and analysis activities to investigate whether a source area exists resulting from past releases near the western portion of Building TR-1.

An estimated seven (7) borings will be advanced in the area shown on **Figure 3-1 (see inset)**, for the collection of shallow subsurface soil samples. Sampling locations may be adjusted due to

inaccessibility or obstructions, or based on field observations. Every effort will be made to target suspect areas. Each sampled location will be surveyed in the field using a Global Positioning System (GPS) device.

Borings will be advanced to a maximum depth of 1 foot below any paving materials, with one soil sample obtained from each borehole. Sampling and decontamination procedures are included in **Appendix A** of the *Potential Source Work Plan*, (Carrier 2009). In areas where contamination is observed while drilling, or in areas where deeper contamination is considered more likely, borings will be advanced to deeper depths. Drilling will be performed using direct-push technology (DPT) or soil hand-augering.

Soil samples collected in this area that are submitted to the laboratory for analysis will be analyzed for PCBs using EPA Method 8082 and VOCs using USEPA SW-846 Method 8260B.

Additional sediment samples will not be obtained from this storm line. Carrier will approach the investigation and future actions using a step-wise approach:

- Prevent migration of PCB-containing sediments from the Transformer Yard Area from migrating down the Thompson Road line
- Remove PCB-containing sediments from the Thompson Road line manholes
- Monitor storm water and check manholes for sediment accumulation over a period of time (e.g., quarterly for one year)

If PCB-containing sediments continue to be found in the Thompson Road line manholes, Carrier will investigate the possibility of another source. If confirmation monitoring determines the manholes are PCB free, it can be concluded that the actions taken upgradient adequately addressed the issue.

Proposed Action – TR-18 Storm Line: Sediment samples will be obtained from the TR-18 storm line manholes as shown on **Figure 3-1 — TR-18 Storm Line, Proposed Manhole Sediment Sampling Locations,** so that a possible source of the historical PCBs found in MH-126 might be found. These manholes have been selected because they are downgradient of laterals that branch off the main TR-18 trunk line. If sediments from these locations are found to contain PCBs, then Carrier will sample the next most upgradient manhole.

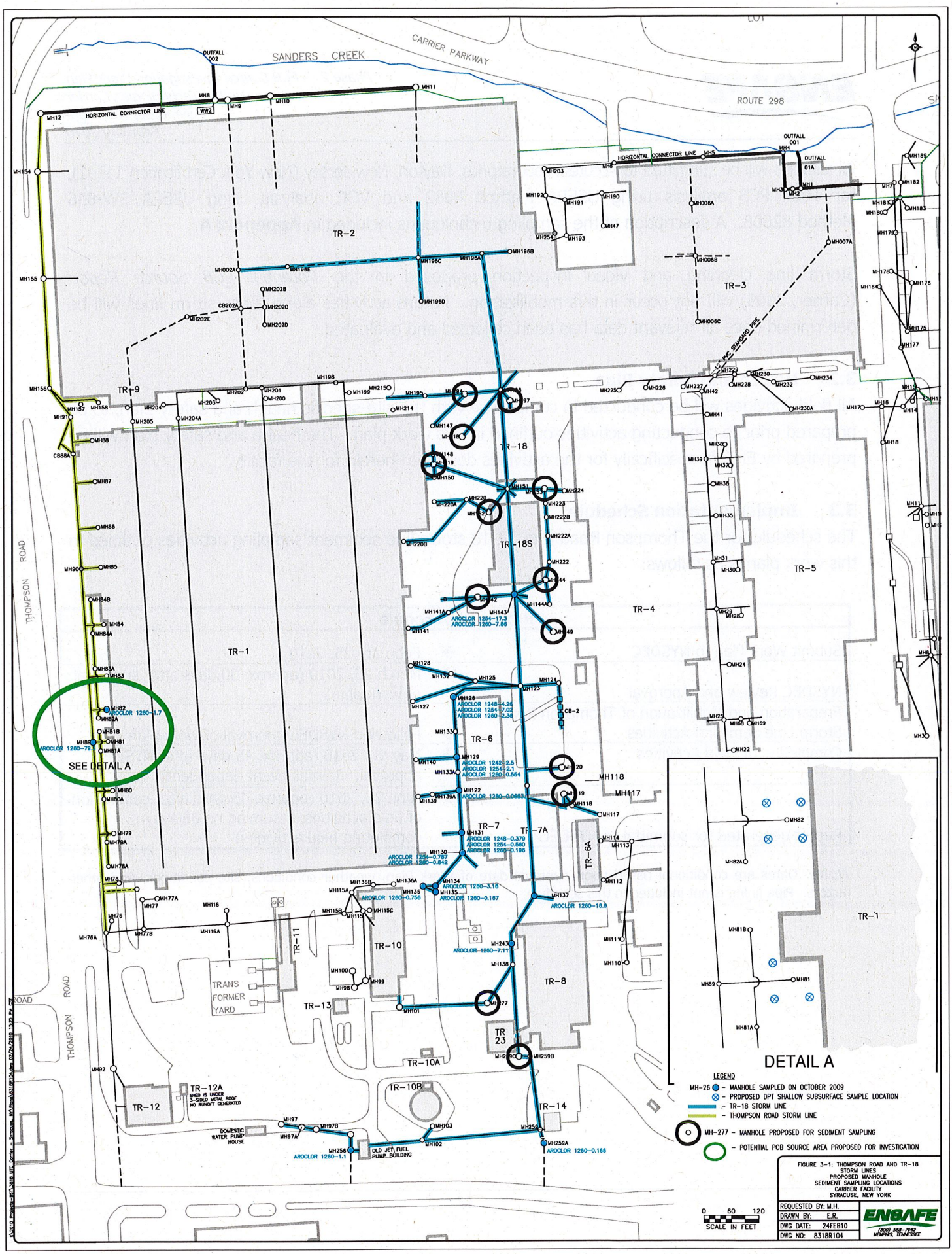

FIGURE 3-1: THOMPSON ROAD AND TR-18 STORM LINES
PROPOSED MANHOLE SEDIMENT SAMPLING LOCATIONS
CARRIER FACILITY
SYRACUSE, NEW YORK

REQUESTED BY:	M.H.
DRAWN BY:	E.R.
DWG DATE:	24FEB10
DWG NO:	8318R104

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All samples will be submitted to Accutest Laboratories, Dayton, New Jersey (New York Certification 11791), for Total PCB analysis using USEPA Method 8082 and VOC analysis using USEPA SW-846 Method 8260B. A description of the sampling technique is included in **Appendix A**.

Storm line cleaning and video inspection proposed in the *Potential PCB Source Report* (Carrier, 2009) will not occur in this mobilization. Future activities along these storm lines will be determined once all relevant data has been collected and evaluated.

3.2 Health and Safety Plan

All field activities will be conducted in compliance with the site-specific health and safety plan, to be prepared prior to conducting activities outlined in this work plan. The health and safety plan will be prepared by EnSafe specifically for the activities described herein for the facility.

3.3 Implementation Schedule

The schedule for the Thompson Road and TR-18 storm line sediment sampling activities outlined in this work plan is as follows:

Proposed Schedule		
Submit Work Plan to NYSDEC	→	February 25, 2010
NYSDEC Review and Approval	→	March 25, 2010 (approx. 30 days after submittal of work plan)
Preparation and Mobilization of Thompson Road Storm Line Sampling Activities	→	Following NYSDEC approval of work plan
Completion of Field Activities	→	May 10, 2010 (approx. 45 days after NYSDEC approval. Rainfall event dependent)
Report generated for submittal to NYSDEC	→	June 25, 2010 (approx. 45 days after completion of field activities, assuming no delays in completing field activities)

Note: Dates are conditional based upon approval date of Work Plan, weather conditions, site conditions, and other factors. Pipe lining is not included in this schedule.

4.0 POTENTIAL SOURCE AREA: DRAINAGE BASIN 001 TR-4/TR-5 STORM LINE

The TR-4/TR-5 storm line consists of over 16,000 linear feet of storm line and manholes that ultimately discharge to Sanders Creek via PS-1/Outfall 01A (during low flows) and Outfall 001 (during overflows). NYSDEC has requested additional sampling be performed along this storm line based on historical data and due to the ubiquity of PCBs throughout the rest of the site.

4.1 Summary of Past Investigations

Manhole Sediment Sampling, 2001: In 2001, sediment samples were obtained primarily from the Transformer Yard Area manholes to determine if it was the source of PCBs in Sanders Creek sediments. As part of the sampling event, a single sediment sample was obtained from the TR-4/TR-5 storm line at MH-39 (near the north end of Buildings TR-4 and TR-5) and was found to contain 0.386 mg/kg Aroclor 1260.

PCB Storm Water Quality Study (PSWS): Storm water data was collected from Manhole 1 immediately upstream of Outfall 001 from November 2007 through October 2008 and included 41 composite samples and 23 grab samples on 30 days, 22 of which were days when the outfall experienced overflow conditions. PCB analysis was performed on both unfiltered and filtered samples.

- Of the 8 days that were sampled during non-overflow conditions, none exceeded the current practical quantification limit (PQL) of 0.30 micrograms per liter (µg/L) per Aroclor or the proposed PQL of 0.2 µg/L and only one exceeded the method detection limit (MDL) of 0.065 µg/L per Aroclor. (Aroclor 1254 was found at 0.074 µg/L in a composite sample on December 4, 2007.) All flows during these conditions are pumped to the treatment building and discharged through Outfall 01A.

- During the study period, overflows at Outfall 001 occurred on 100 days of which samples were collected on 22 days. None of the samples yielded a result above either the current PQL of 0.30 µg/L per Aroclor or the proposed PQL of 0.2 µg/L. Only 2 days and 3 samples (Aroclor 1260 at 0.076 µg/L in a grab sample on July 13, 2008, and at 0.092 µg/L in a grab sample and 0.083 µg/L in a composite sample on September 27, 2008) had a PCB concentration greater than the MDL of 0.065 µg/L per Aroclor, and then only marginally.

The complete data from the PSWS study may be found in the *PCB Storm Water Quality Study* (Carrier, 2008), which was submitted to NYSDEC in November 2008.

Pollutant Minimization Program (PMP): To date, PMP samples have been obtained on five (5) days at this location (Manhole 1 just upstream of the Outfall 001 overflow weir), with all 5 samples obtained during overflow conditions. The first three and the fifth quarterly sampling events indicated the absence of any Aroclor above the concentration of 0.065 µg/L. In the fourth event Aroclor 1260 was detected at a concentration of 0.128 µg/L and Aroclor 1254 was detected at 0.077 µg/L. Additional information regarding the PMP and recent findings may be found in the *PMP Annual Report* (Carrier, 2010), which was submitted to NYSDEC in February 2010.

4.2 Proposed Sampling Activities

Sediment samples will be collected from approximately seven (7) manholes along the TR-4/TR-5 storm line (**Figure 4-1 — TR-4/TR-5 Storm Line, Proposed MH Sediment Sampling Locations**). Sediment samples collected from these manholes will be analyzed for PCBs using USEPA Method 8082 and VOCs using USEPA SW-846 Method 8260B.

4.3 Health and Safety Plan

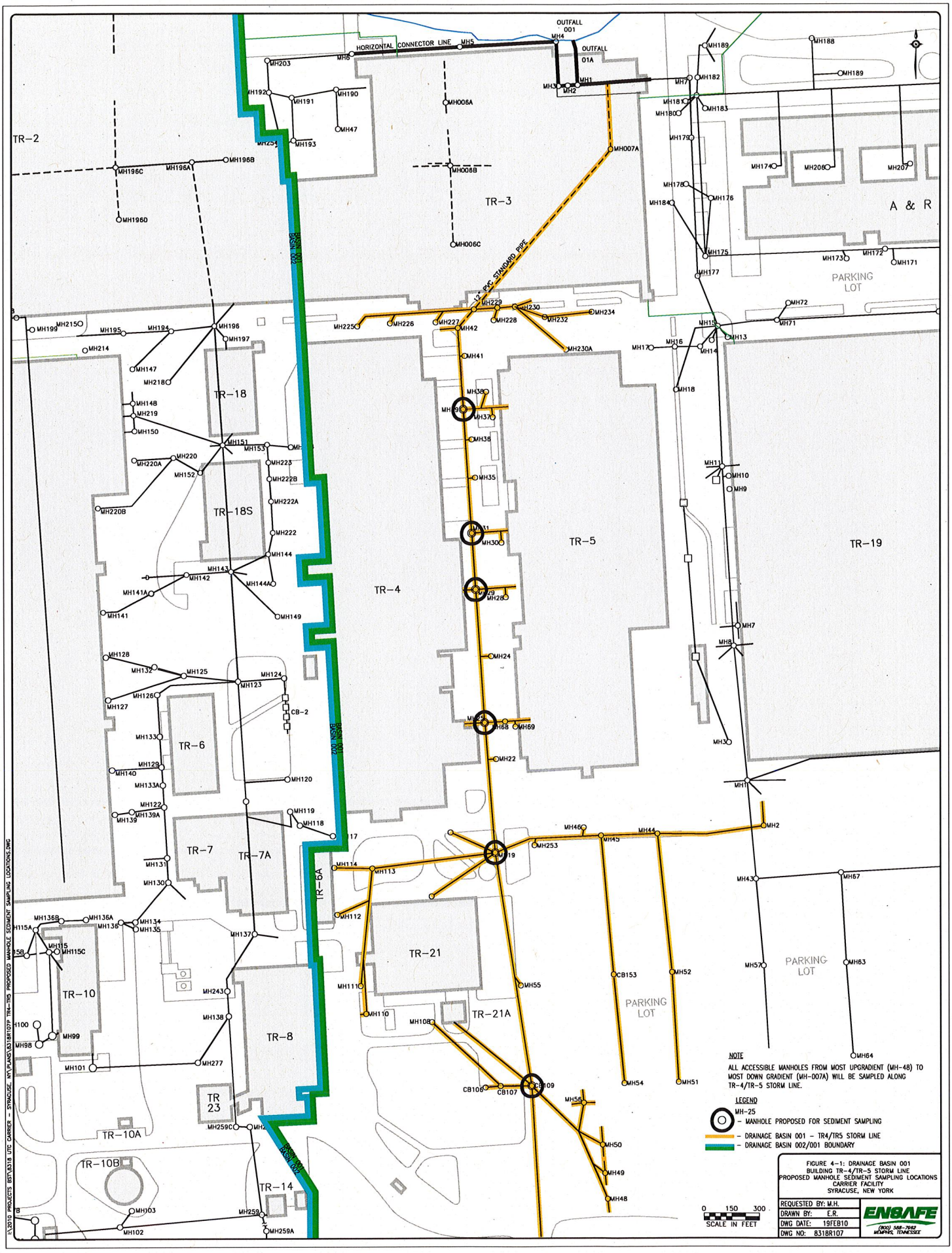
All field activities will be conducted in compliance with the site-specific health and safety plan, to be prepared prior to conducting activities outlined in this work plan. The health and safety plan will be prepared by EnSafe specifically for the activities described herein for the facility.

4.4 Implementation Schedule

The schedule for the TR-4/TR-5 storm line sediment sampling activities outlined in this work plan is as follows:

Proposed Schedule	
Submit Work Plan to NYSDEC	→ February 25, 2010
NYSDEC Review and Approval	→ March 25, 2010 (approx. 30 days after submittal of work plan)
Preparation and Mobilization for Field Activities	→ Following NYSDEC approval of work plan
Completion of Field Activities	→ May 10, 2010 (approx. 45 days after NYSDEC approval)
Report generated for submittal to NYSDEC	→ June 25, 2010 (approx. 45 days after completion of field activities, assuming no delays in completing field activities)

Note: Dates are conditional based upon approval date of Work Plan, weather conditions, site conditions, and other factors.


OUTFALL 001
OUTFALL 01A
HORIZONTAL CONNECTOR LINE
12" PVC STANDARD PIPE
TR-2
TR-3
TR-4
TR-5
TR-6
TR-7
TR-7A
TR-8
TR-10
TR-10A
TR-10B
TR-14
TR-18
TR-18S
TR-19
TR-21
TR-21A
TR 23
A & R
PARKING LOT
PARKING LOT
PARKING LOT
BASIN 001
BASIN 002
BASIN 001
BASIN 002
NOTE
ALL ACCESSIBLE MANHOLES FROM MOST UPGRADIENT (MH-48) TO MOST DOWN GRADIENT (MH-007A) WILL BE SAMPLED ALONG TR-4/TR-5 STORM LINE.
LEGEND
MH-25 - MANHOLE PROPOSED FOR SEDIMENT SAMPLING
- DRAINAGE BASIN 001 - TR4/TR5 STORM LINE
- DRAINAGE BASIN 002/001 BOUNDARY
0 150 300
SCALE IN FEET
FIGURE 4-1: DRAINAGE BASIN 001
BUILDING TR-4/TR-5 STORM LINE
PROPOSED MANHOLE SEDIMENT SAMPLING LOCATIONS
CARRIER FACILITY
SYRACUSE, NEW YORK
REQUESTED BY: M.H.
DRAWN BY: E.R.
DWG DATE: 19FEB10
DWG NO: 8318R107
ENSAFE
(800) 588-7962
MEMPHIS, TENNESSEE
C:\2010 PROJECTS BSY\8318 UTC CARRIER - SYRACUSE, NY\PLANS\8318R107P TR4-TR5 PROPOSED MANHOLE SEDIMENT SAMPLING LOCATIONS.DWG