09 December 2002

Ithaca Court St. MGP Site

William S. Ottaway, PE
Environmental Engineer 2
Bureau of Western Remedial Action
MGP Section
NYSDEC
625 Broadway
Albany, NY 12233-7017

Subject: Ithaca Court St. Former MGP Site
Work Plan for Additional Surface Soil Sampling and Groundwater Gauging

Dear Mr. Ottaway:

Attached please find a letter from MWH Americas, dated 05 December 2002, which is the subject work plan.

In response to your 18 November 2002 letter, and subsequent telephone conversations regarding the need to achieve low detection limits, MWH Americas will aggressively manage the contract analytical laboratory to achieve the lowest practical detection limits for the surface soil samples. As was discussed with you by Bruce Ahrens and Tony Noce of MWH Americas on 02 December 2002, it is not always possible for the laboratory to produce results at the Contract Required Quantification Limit, hence the commitment by MWH Americas to work with the laboratory to achieve the lowest practical detection limits.

Your 18 November 2002 letter also requests that NYSEG collect additional surface soil samples in the vicinity of SS-1 to determine whether there is a correlation between the PAH levels and the proximity to the road, or whether the PAH levels as SS-1 are an isolated anomaly. Based on a review of Sanborn fire insurance maps from the period when the MGP was operational, it is apparent that the entire eastern half of the block was occupied by residential homes. Review of NYSEG's natural gas operating records indicate those homes remained in existence until the late 1960's, well beyond the date the MGP was razed. Thus, it is very unlikely that any MGP wastes were disposed on the ground surface in the vicinity of SS-1, either during operation of the plant or when it was decommissioned. While I agree it would be an interesting study to determine if there is a correlation between the PAH levels and the proximity to the road, NYSEG's apparent lack of responsibility for those PAH's precludes me from collecting the requested samples.

As discussed with you on Friday, 06 December 2002, MWH Americas is tentatively scheduled to implement the attached work plan beginning on Monday, 16 December 2002. Please call me if you have any questions regarding this matter.

Sincerely,

Tracy Blazicek

Tracy L. Blazicek
Senior Environmental Specialist
Licensing & Environmental Operations

MWH
MONTGOMERY WATSON HARZA

December 5, 2002

Mr. Tracy L. Blazicek, CHMM
NYSEG
Corporate Drive- Kirkwood Industrial Park
P.O. Box 5224
Binghamton, New York 13902-5224

Subject: **Ithaca Court Street Site**
Work Plan to Conduct Surface Soil Sampling & Groundwater Gauging

Dear Tracy;

Per your request, MWH Americas, Inc. (MWH) has prepared this work plan to collect surface soil samples in the vicinity of the Ithaca Court Street site. The New York State Department of Environmental Conservation (NYSDEC) and New York State Department of Health (NYSDOH) are requiring this additional work based on their review of the results from the surface soil sampling previously conducted. In addition, the monitoring wells currently existing will be gauged as part of this investigation to supplement the existing database. A summary of the scope of work is provided below.

1.0 Surface Soil Sampling

Surface soil samples will be collected from a total of 26 locations in the vicinity of the Ithaca site. The approximate locations of these samples are shown on **Figure 1** (**Attachment A**). Six specific objectives were considered when selecting the locations for sample collection. These objectives include:

- Determine the concentrations of polycyclic aromatic hydrocarbons (PAHs) present along West Court Street between Route 13 South and North Cayuga Street.
- Determine the concentration of PAHs present along Washington Street north of the intersection with West Court Street (i.e. north of previously collected sample SS-10).
- Determine the concentration of PAHs present along Park Place north of the intersection with West Court Street.
- Determine if concentrations of PAHs in surface soil decreases with distance from West Court Street.

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- Re-sample the same locations as the previously collected "background" samples (SS-6, SS-7, SS-8, SS-9, and SS-11) for analysis of PAHs at lower detection limits than the previous analysis. This is required based on the NYSDOH's recent policy change that now uses benzo{a}pyrene Toxicity Equivalence as a screening tool for remediation of surface soils (Draft letter correspondence; Ottaway to Blazicek, October 31, 2002).
- Further delineate the trends/concentrations of PAHs around the location of SS-10 (near the intersection of West Court and Washington Streets).

Table 1.0 (**Attachment B**) presents a summary of the specific objectives associated with each of the proposed surface soil sampling locations. A summary of the proposed analyses and QA/QC sampling is included in **Table 2.0** (**Attachment C**).

The surface soil samples will be collected in a manner consistent with previous field investigations using dedicated stainless steel trowels and a stainless steel bowl. Sample collection will follow the QA/QC requirements as defined in the site's *Quality Assurance Project Plan* (QAPP) and *Field Sampling Plan* (FSP). Prior to collecting each sample, the upper layer of grass will be removed (if present), and the samples will be collected from 0-2 inches below ground surface. The samples will be packed on ice and shipped to Severn Trent Laboratories in Amherst, New York via overnight courier for analysis.

A site reconnaissance visit will be conducted to confirm the sampling locations prior to initiating field work. It is anticipated that the final sampling locations will be selected as a collaborative agreement between NYSEG, the NYSDEC, NYSDOH, and MWH.

2.0 Groundwater Gauging

Monitoring wells that were installed during previous subsurface investigations will be gauged to supplement existing data on the groundwater flow direction. Groundwater from both the shallow, unconfined aquifer and the intermediate, confined aquifer will be gauged using an electronic interface probe (IP) as described in the QAPP and FSP. A total of 34 wells are believed to exist.

The 19 existing monitoring wells that are screened in the shallow aquifer include:

MW-1S	MW-12S	MW-20S
MW-2S	MW-13S	MW-21S
MW-4S	MW-14S	MW-22S
MW-5S	MW-15S	MW-23S
MW-6S	MW-16S	MW-24S
MW-10S	MW-17S	
MW-11S	MW-18S	

The 15 existing monitoring wells that are screened in the intermediate aquifer include:

MW-3D	MW-14D	MW-20D
MW-4D	MW-15D	MW-21D
MW-5D	MW-17D	MW-22D
MW-11D	MW-18D	MW-23D
MW-13D	MW-19D	MW-24D

The results from the gauging will be recorded on a field log.

All field work described in **Sections 1.0** and **2.0** will be conducted under the guidance and requirements of the site *Health and Safety Plan*.

3.0 Data Validation

The laboratory data will be validated by an MWH Chemist who meets the NYSDEC requirements for conducting validation of data in New York State. A Data Usability summary Report (DUSR) will be prepared presenting the results of the validation.

4.0 Reporting

A summary report will be prepared that presents the results from the surface soil sampling and monitoring well gauging. The report will be in "letter" format and, at a minimum, will include:

- A brief description of the field activities (approximately 1-2 pages)
- A summary of the conclusions from the data validation (1-2 paragraphs)
- A presentation of the tabularized results from the surface soil sampling activities
- Appendices
  - Tables (Surface Soil Results, including previously collected data)
  - Figures (Surface Soil Sampling Results- PAHs, Shallow Groundwater Gradient Map, Intermediate Groundwater Gradient Map)
  - Gauging Logs
  - Data Usability Summary Report

The objective of this summary report is to provide the data from the investigation to NYSEG and the NYSDEC. This data will be discussed in detail as part of the remedial investigation report for Operable Unit –2.

Please feel free to contact me at (518) 640-6016 with any questions or comments that you may have.

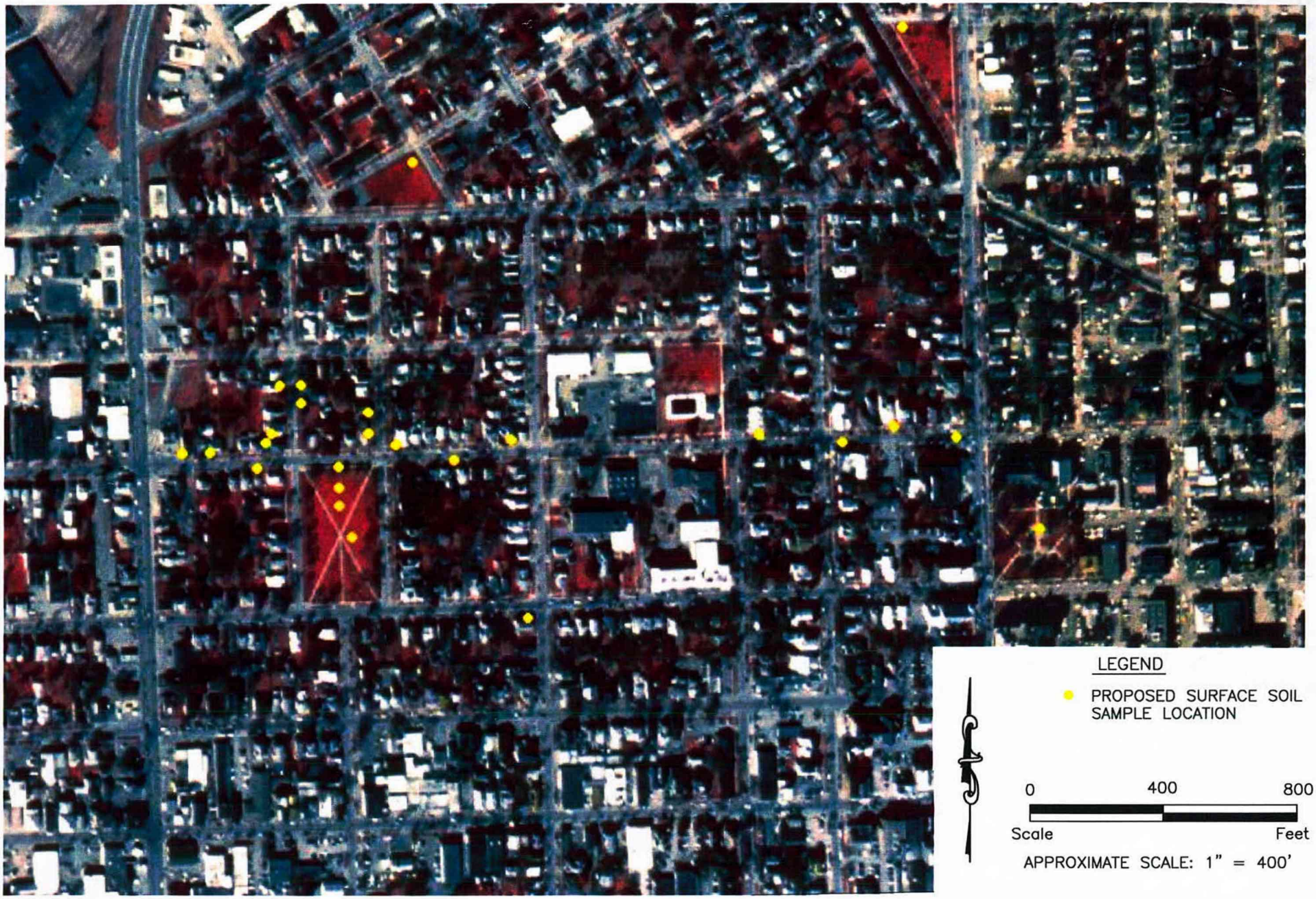
Sincerely,
MWH Americas, Inc.

Bruce W. Ahrens, CHMM
Senior Project Manager

C: W. Ottaway/NYSDEC
J. Santacroce/MWH

Attachments:

A Figure 1
B Table 1.0, Surface Soil Sampling Objectives
C Table 2.0, Sampling and Analysis Summary



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NYSEG
ITHACA/ COURT STREET SITE

PROPOSED SURFACE SOIL SAMPLE LOCATION PLAN

FIGURE
1

11/15/02 80037701/3701c20.dwg

ATTACHMENT B

Table 1.0
Surface Soil
Sampling Objectives

Objective	Sample I.D.
Determine concentrations of PAHs along West Court St. between Rt. 13 and North Cayuga St.	SS-16, SS-17, SS-18, SS-19, SS-20, SS-21, SS-22, SS-23 SS-24, SS-25, SS-26, SS-30
Determine concentrations of PAHs along Washington St. north of West Court St.	SS-27, SS-28, SS-29
Determine concentrations of PAHs along Park Place north of West Court St.	SS-35, SS-36
Determine if concentrations of PAHs decrease with increasing distance from West Court St.	SS-31, SS-32
Re-sample previous location of "background" samples	SS-37, SS-38, SS-39, SS-40, SS-41
Further delineate PAHs around sample location SS-10	SS-33, SS-34

ATTACHMENT C

Table 2.0
Sampling and Analysis Summary

Task	Sample I.D.	Analysis	No. of Samples	Field QA/QC Samples			Laboratory QA/QC Smpls		TOTAL
				Trip Blanks[1] (5%)	Field Dups (5%)	Equip Blanks	MS/MSD	MSB	
Surface Soils	SS-16, SS-17, SS-18, SS-19, SS-20, SS-21, SS-22, SS-23, SS-24, SS-25, SS-26, SS-27, SS-28, SS-29, SS-30 SS-35, SS-36SS-31, SS-32, SS-33, SS-34, SS-37, SS-38, SS-39, SS-40, SS-41	PAHs*	26	0	2	0	4 (2 each)	2	34

1 Trip Blanks are water samples analyzed for volatile compounds (i.e. BTEX) only

* PAH analysis by NYSDEC 95-1

Laboratory sample analyses will be performed using NYSDEC Analytical Services Protocol (ASP 1995)- CLP levels with Category B deliverables