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July 31, 2019

Gerald Pratt
NYSDEC
Division of Environmental Remediation
Remedial Bureau C, 11th Floor
625 Broadway, Albany, New York 12233-7014

**Subject: AECOM
Engineering and Construction Oversight Services
NYSEG Penn Yan Water Street Remediation Project
KEUKA LAKE OUTLET SHEEN INVESTIGATION – WORK PLAN**

Dear Mr. Pratt,

The purpose of this letter is to provide a work plan for the investigation of a coal tar sheen that has been observed intermittently in the Keuka Lake outlet. After observing the sheen during on-site inspections, you requested that an investigation be conducted to attempt to determine the location(s) or area where the sheen originates. This work plan outlines the scope of work that AECOM plans to undertake to complete the sheen investigation. Please note that depending on the results of this investigation, additional study may be necessary to further assess the nature and extent of subsurface coal tar impacts, further remediation may be required if subsurface impacts are identified.

Scope of Work

Field Investigation

The general approach AECOM proposes to complete the investigation will involve probing the sediment in the outlet. AECOM anticipates that if there are residual coal tar impacts in the outlet shallow sediment that constitute the source of the sheen, probing impacted sediments are expected to release additional sheen to the outlet water surface. AECOM proposes to probe the sediment at numerous locations east of the former railroad bridge alignment to the Keuka Lake Outlet control structure where the sheen has been observed. Additionally upstream of the former railroad bridge probing will follow a "transect" on the alignment of the dredging cell divider sheeting and ten foot by ten foot boxes at each of the outfalls that discharge to the Keuka Lake Outlet.

AECOM plans to use 3/4" threaded galvanized water pipe to probe the sediment. AECOM will access the study area using a suitably-sized and outfitted boat and attempt to push the sediment probes at maximum 10-foot spacing along the channel. Actual locations will be dictated on field conditions and on results as they are obtained. At each location, the probe pipe will be pushed/driven 3 feet (or less if refusal is met) at an angle into the sediment/soil beneath the channel bottom. The probe pipe will then be rotated in a revolving motion in attempt to disturb the shallow sediment. The outlet water surface will be monitored at and downstream of each probe for evidence of sheen. It may be possible for sheen to be released during the initial probe, during the probe rotation, or during probe extraction. AECOM assumes no liability or responsibility for any such release of sheen or the creation, existence, or

presence of the sheen. Additional probing will be conducted if necessary in areas if sheens are observed.

Probing will begin at the Keuka Lake Outlet Control Structure (downstream end of the planned investigation area) and then proceed in an upstream direction to the northern abutment of the former railroad bridge, so that downstream flow of potential released sheen does not interfere with the investigation progression. Upstream of the former railroad bridge probing will follow a "transect" on the alignment of the dredging cell divider sheeting and ten foot by ten foot boxes at each of the outfalls that discharge to the Keuka Lake Outlet. Outfall locations and condition will be confirmed at the time of field work. Probing will only be conducted when the Outlet Control Structure has no more than one gate open halfway. The intent is to conduct probing only when the outlet flow is minimal such that any potential sheen does not travel long distances from the area of disturbance/source. It will also be necessary to conduct the probing work outside of the NYSDEC Fish and Wildlife protected fish spawning season (i.e., not between May 1 and June 30).

AECOM will note and photo document sheen releases, if any, that are observed during the investigation. The investigation will not include the collection of any samples for laboratory analysis.

AECOM will stake and flag any probed area(s) or probe points where the investigation releases sheen so that they can be surveyed and documented. Any surveying that is necessary will be completed by the on-site remedial contractor, Severson Environmental Services (SES).

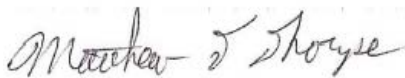
Reporting

AECOM will prepare a letter report to summarize the results of the sheen investigation. The report will describe the investigation work and findings, and provide recommendations for follow up actions, if any are deemed necessary.

Schedule

The outlet sheen investigation will begin as soon as practicably possible after receipt of NYSDEC's approval of this Work Plan. The field portion of the work is expected to require less than one week of onsite activities. NYSEG will inform NYSDEC prior to conducting the work. The investigation letter report will be submitted to NYSDEC within 30 days after the completion of the field work.

Sincerely yours,

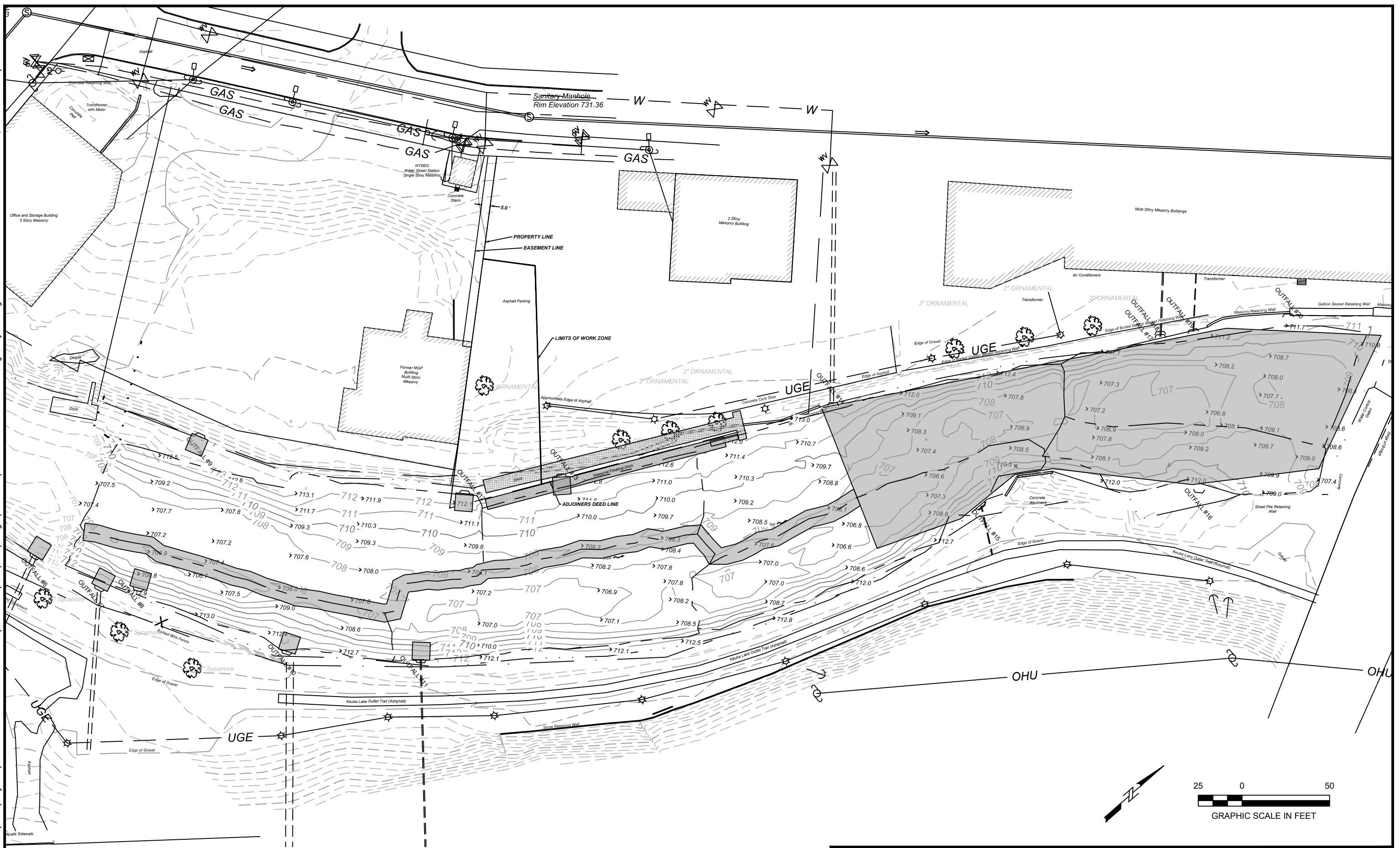


Matthew T. Thorpe, PE
Project Manager

cc: John Ruspantini, NYSEG

Attachment 1 – Figure 1

File: \\usaby2fp001\data\Projects\60284725_NYSEG Penn Yan RD\7.2 CADD\500\Civil\Design\WORKING\SHEN-INVEST-AREA_EH.dwg Layout: Figure 1 User: Erica.Hart Plotted: Jul 30, 2019 - 1:24pm Xref's:



NOTE: OUTFALL LOCATIONS TO BE CONFIRMED IN THE FIELD.

- PROPOSED SHEEN INVESTIGATION AREAS
- OUTFALL LOCATIONS

NYSEG Penn Yan Water Street Manufactured Gas Plant NYSDEC Site # 8-62-009			Proposed Sheen Investigation Area	
DATE: 7/30/2019	DRWN:		FIGURE 1	