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March 14, 2007

RECEIVED

Mr. David Locey
Environmental Engineer
New York State Department of Environmental Conservation
Division of Environmental Remediation
270 Michigan Avenue
Buffalo, New York 14203

MAR 14 2007

NYSDEC REG 9
FOIL
✓ REL UNREL

Re: 2007 Sewer Sampling Work Plan
Former GE Apparatus Service Center
318 Urban Street
Buffalo, New York

Dear Mr. Locey:

On behalf of GE, URS is providing this *2007 Sewer Sampling Work Plan* for GE's former Apparatus Service Center at 318 Urban Street in Buffalo, New York. This work plan has been developed based on GE's dialogue with Mr. Gene Melnyk of the New York State Department of Environmental Conservation (NYSDEC) in February 2007.

BACKGROUND

GE operated an apparatus service center at 318 Urban Street from 1921 to approximately 1968. The service shop was used to service and repair industrial and utility equipment, including electric transformers. Based on previously completed remedial investigations for the site, PCBs were found in sediment in the on-site and off-site sewers downstream of the Urban Street site.

As part of the work conducted pursuant to the requirements of GE's Order on Consent (Index #B9-0388-91-09), GE has replaced and cleaned various sections of the sewers near the Urban Street site. GE monitored sewers near the site during 1998, 1999, and 2000. Results of these monitoring events are summarized in the February 19, 2001 *Results of 2000 Sewer Sampling* report. Monitoring data indicate that PCB concentrations in the sewers had decreased over time and as a result of repeated sewer cleaning.

The presence of a rootball in the Beltline sewer between Winslow Avenue and East Ferry Street prevented GE from cleaning a section of the Beltline sewer between Box Avenue and East Ferry Street as originally planned. At the time, there were concerns about liability if the sewer were to collapse during removal of the rootball. In the event of a collapse, rail traffic could be negatively impacted either as a direct result of a collapse or because of the excavation that would be required to repair the line.

In August 2004, the Buffalo Sewer Authority (BSA) elected to remove the rootball from this section of sewer without GE's involvement. The purpose of the 2007 sampling event is to document the condition of the Beltline section of the sewer now that the rootball has been removed. Information gathered from this sampling event will be used to evaluate whether



remedial goals were achieved, and that PCBs are no longer present at concentrations that pose a threat to human health or the environment. If PCBs are detected in the water samples, the results will be compared to BSA's discharge limit of 0.3 micrograms per liter ($\mu\text{g/L}$) and BSA's maximum allowable instantaneous discharge limits of 2 $\mu\text{g/L}$.

2007 SEWER SAMPLING WORK PLAN

GE will perform additional sampling to document conditions in the Beltline sewer now that the root mass has been removed. To assess the current concentrations of PCBs in the water and sediment of the sewers near the site, URS will collect and analyze sediment and water samples from off-site locations up and down stream of the former rootball location. These three proposed sampling locations are shown in Figure 1:

- Beltline sewer at East Ferry Street;
- Beltline sewer at Winslow Avenue; and
- Beltline sewer at Box Avenue.

At each location, a water sample and, if present, a sediment sample will be collected and analyzed for PCBs. The water samples from each location will be analyzed using EPA Method 608. A reporting limit of 0.05 $\mu\text{g/L}$ will be targeted for the PCB analysis of the water samples. The sediment samples will be analyzed for PCBs using EPA Method 8082. A practical quantification limit of 0.5 mg/kg will be targeted for the PCB analyses of the sediment samples. One duplicate sample per media will be collected and analyzed.

Sampling will be performed in early April 2007, pending DEC's and Buffalo Sewer Authority's approval of this work plan. A letter report summarizing the sample results as well as our conclusions and recommendations for the sewer will be provided to you in May 2007.

oOo

Please contact the undersigned at 518 688-0015 or Ms. Dawn Varacchi of GE at 508 836-6728 if you have any questions regarding this material.

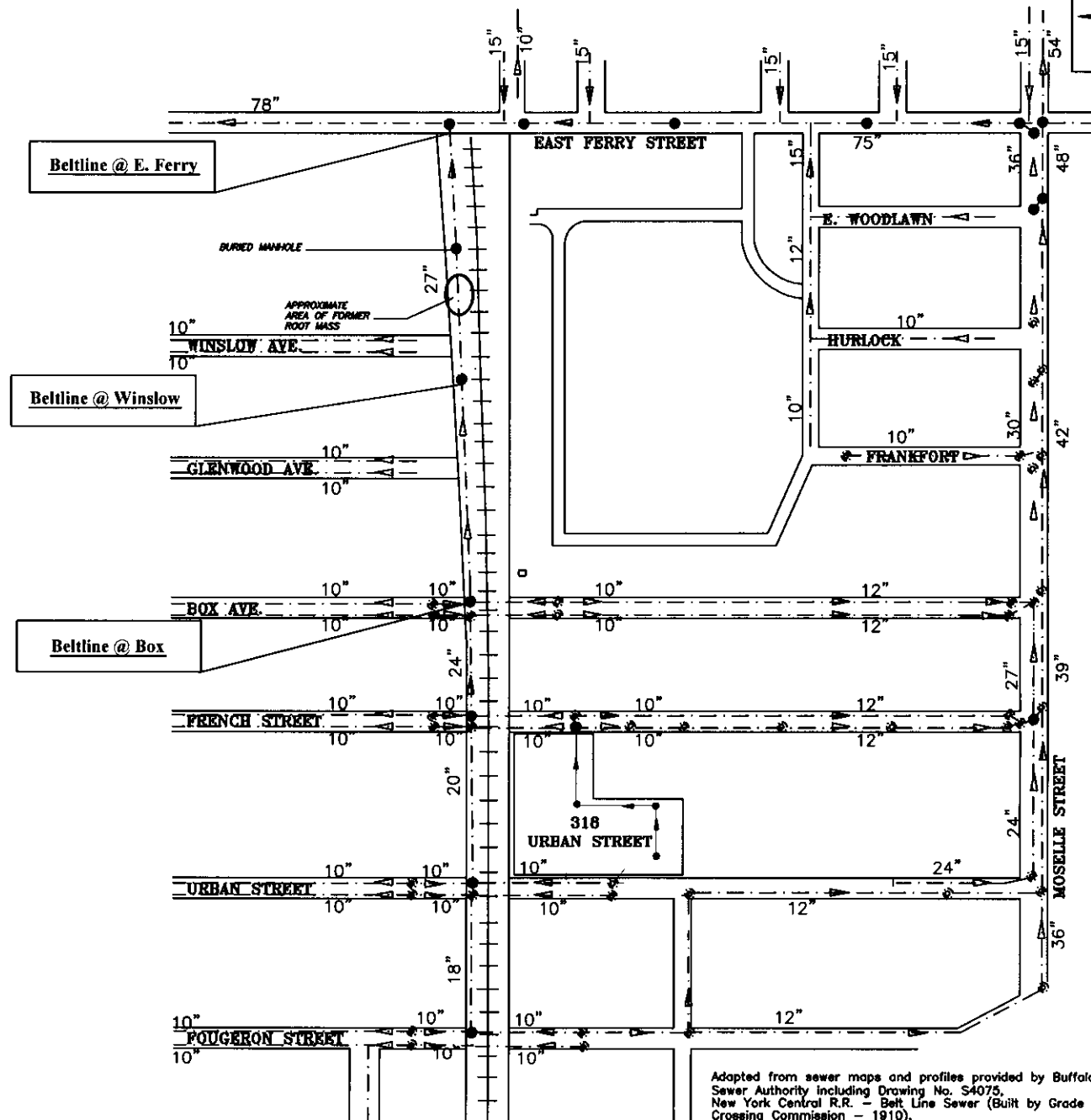
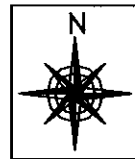
Very truly yours,
URS

A handwritten signature in cursive script, appearing to read "Karen Peppin".

Karen Peppin
Project Manager

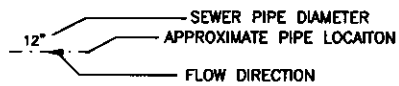
Attachments: Figure 1 – Proposed Sewer Sampling Locations

cc: Leslie Sedita, BSA
Dawn Varacchi-Ives, GE

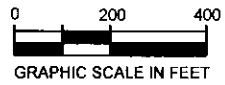



Adapted from sewer maps and profiles provided by Buffalo Sewer Authority including Drawing No. S4075, New York Central R.R. - Belt Line Sewer (Built by Grade Crossing Commission - 1910).
Adapted from ERM-Northeast Drawing Nos. C-6, Railroad Sewer Plan 3/30/97, and CL-009, Off-Site Sewer Cleaning Location Vicinity of 318 Urban Street Buffalo, New York 7/26/96. Both drawings are from the Project Manual, Building Decontamination and Soil Remediation, 318 Urban Street, March 28, 1997.

LEGEND



NOTES:
Manholes shown only where observed.



Title: PROPOSED 2007 SEWER SAMPLING LOCATIONS
Location: 318 URBAN STREET BUFFALO, NEW YORK
Client:  GENERAL ELECTRIC COMPANY

URS
URS Corporation
28 Corporate Drive, Suite 200
Clifton Park, New York 12065

Drafter: DAD	Date: March 2007
Drg. Size: 8.5 x 11	Job No.: 38394525.00000

FIGURE 1