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September 11, 2007

Mr. John J. Piston
Project Manager
NYSDEC Region 7
615 Erie Boulevard West
Syracuse, New York 13204-2400

Re: Work Plan for Well Decommissioning
Pass & Seymour (P&S) Boyd Ave Brownfield Cleanup Program
(BCP) Site No. C734102

Dear Mr. Piston:

This letter Work Plan relates to the decommissioning of certain groundwater monitoring wells that were installed by others (not Pass & Seymour) prior to the Boyd Ave. site's acceptance into the Brownfield Cleanup Program (BCP). Following discussions with the Department prior to acceptance of the RI Work Plan, there was concurrence that these wells were not to be part of the BCP Site Remedial Investigation (RI).

APPROACH

The wells will be decommissioned by a qualified well driller with oversight by an S&W Redevelopment of North America, LLC (SWRNA) representative who will be present to observe the decommissioning, and record observations.

A. Inspection, Measurements, and Decommissioning. SWRNA personnel will identify and inspect the monitoring wells to be decommissioned, including the depth to water and the total well depth of each well at the time of decommissioning. The wells will be decommissioned consistent with *Groundwater Monitoring Well Decommissioning Procedures* (NYSDEC, October 1996) by a casing pulling approach. The casing pulling approach will be used to pull the PVC well casing and associated seal materials (sand, bentonite, cement) from the borehole, while introducing a bentonite/cement grout from the bottom up, in tremie fashion. The bottom plug of each well will be pushed out prior to pulling the casing, by inserting and pushing a metal rod through the bottom. The bentonite/cement grout will be tremied into the PVC and forced out the bottom of the PVC as the wells are pulled to ensure that there is no collapse of formation materials as the wells are removed.

In accordance with *Groundwater Monitoring Well Decommissioning Procedures*, overdrilling techniques may be used if the PVC casing or well screen is severed during casing pulling, or if the well seal materials are not removed as the PVC is removed. Overdrilling would create a borehole of the same or greater diameter as the original

boring, by hollow stem augers. Bentonite/cement grout would be introduced through the bottom of the augers as the augers are removed.

By either approach, the bentonite/cement grout will be brought to within six (6) inches of grade. The remaining space will be filled with a material patch that matches the surrounding area (e.g. topsoil, asphalt, cement, gravel).

B. Disposal. Well materials removed from each borehole will be staged on plastic in a designated area of the site prior to being properly disposed of. This includes PVC, concrete debris, protective casings, and well seal materials such as sand and bentonite. Materials with evidence of contamination, if any, will be staged separately from material with no evidence of contamination. Suspected contaminated material will undergo appropriate testing to determine proper disposal.

DOCUMENTATION AND REPORT

A SWRNA field representative will document the decommissioning to include daily reports and field data. Following the completion of work, SWRNA will provide NYSDEC a report that will identify the wells decommissioned by site mapping, construction characteristics (total depth, well screen interval, condition of the well casings), and a narrative description of activities.

SCHEDULE

Work will take between three and five days and will begin within two weeks of NYSDEC acceptance of this letter Work Plan. A decommissioning letter report will be provided within 30 days of decommissioning.

If you have any questions concerning this plan please call me at (315) 422-4949.

Very truly yours,
S&W REDEVELOPMENT OF NORTH AMERICA, LLC

Daniel P. Ours, CPG
Senior Project Manager

cc: Mr. Phil DeCicca, Pass & Seymour
Ms. Doreen Simmons, Hancock & Estabrook