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November 30, 2009

Ms. Tara Blum, P.E.
NYSDEC Region 7
615 Erie Boulevard West
Syracuse, NY 13204-7551

Re: Pre-Design Well Installation Work Plan
Pass & Seymour (P&S) Boyd Ave Brownfield Site
BCP Site # C734102

Dear Ms. Blum:

This letter provides a Work Plan to install additional monitoring wells at the P&S BCP site, and to collect additional shallow soil samples (0 to 12 inches below the root zone), as a pre-design step of the remedial design. The additional wells will be installed in proximity to groundwater areas of concern (AOCs) 1 and 2, to confirm the target treatment zones for in-situ chemical oxidation (ISCO), and finalize the draft Remedial Design Document. Shallow soil samples will be collected between the former manufacturing facility and the loading dock driveway for the office building. In addition, the location of monitoring well MW05-02 will be cleared of debris to observe the condition of the asphalt pavement, for determining whether the pavement can be considered an engineering control in that area.

APPROACH

The attached figures show the proposed locations for additional monitoring wells in the AOC-1 competent bedrock zone (Figure 1), the AOC-1 overburden zone (Figure 2), and the AOC-2 transitional overburden/weathered bedrock zone (Figure 3). The proposed wells will be installed, and groundwater samples will be collected for expedited (24-hour) analysis for volatile organic compounds (VOCs – method 8260). The analytical results will be reviewed with NYSDEC/NYSDOH to determine whether additional monitoring wells may be necessary to finalize the draft Remedial Design Document.

A. AOC-1 BEDROCK CHARACTERIZATION

1. **Bedrock Monitoring Well Installation.** Five (5) bedrock monitoring wells are proposed for AOC-1 (Figure 1).

- One bedrock monitoring well is proposed approximately 50 feet east of existing well IW1-2

- One bedrock monitoring well is proposed approximately 50 feet east of existing well OW1-1
 - One bedrock monitoring well is proposed north (off-site) of AOC-1, in the general area of the northern access road. The installation of this well will be subject to P&S obtaining an access agreement with the owner of the property.
 - One bedrock monitoring well is proposed northwest of IW1-3, in the cut-out area of the building slab where the loading dock previously existed.
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- One bedrock monitoring well is proposed approximately 100 feet west of IW1-1, through the building slab.

The bedrock monitoring wells will be constructed of two-inch diameter PVC, with 15 feet of well screen into competent bedrock. A sand filter pack will extend at least one foot above the top of well screen, with two feet of bentonite on top of the sand pack. The bedrock wells will be installed in the same manner as ISCO observation wells previously installed, by coring 15 feet into competent rock following auger refusal, except for the bedrock well installed north of the site. At this location, the presence of overhead power lines will require a low-profile drill rig that will not permit the collection of rock cores. Instead, a combination of methods including roller bit or rock hammer will be used to drill 15 feet into competent rock for well installation. SWRNA will observe the installation of the bedrock monitoring wells, record observations in a field log, develop the monitoring wells, and prepare soil boring/well construction logs following installation.

2. Soil Sample Collection. One soil sample will be collected from the boring through the building slab, and analyzed for VOCs, semivolatile organic compounds (SVOCs), priority pollutant metals, and PCBs.

3. Groundwater Sample Collection. Groundwater samples will be collected from the newly installed bedrock monitoring wells, and analyzed for VOCs (24-hour T.A.T.). In addition, groundwater samples will be collected from the four (4) injection wells and 4 observation wells previously installed in accordance with the draft Remedial Design Document, as well as monitoring wells BR07-32, BR08-33, BR08-34, and BR09-38. The wells will be purged of a minimum of three (3) volumes prior to collecting groundwater samples. NYSDEC will be notified if any wells are purged dry and do not recover over the course of two days to permit three volumes to be removed. For any such wells, groundwater samples may be collected if fewer than three volumes are removed, with NYSDEC approval.

4. Data Review. SWRNA will tabulate and summarize the groundwater and soil analytical data, and review the analytical results with NYSDEC/NYSDOH to determine the need for any additional bedrock monitoring wells in order to finalize the Remedial Design Document.

B. AOC-1 OVERBURDEN CHARACTERIZATION

1. Overburden Monitoring Well Installation. Three (3) overburden monitoring wells will be installed in AOC-1 (Figure 2).

- One (1) overburden monitoring well will be installed approximately 50 feet east of existing well MW05-10.
- One (1) overburden monitoring well will be installed approximately 100 feet west of existing well MW05-12, through the former building slab.
- One (1) overburden monitoring well will be installed approximately 75 feet west of existing well MW05-07, north of the former building slab.

AOC-1 overburden wells will be installed using the same hollow stem auger drilling methods as used for previous overburden wells in this area. The well borings will be advanced until auger refusal at the top of competent bedrock, and the well will be constructed of two-inch diameter PVC with 5 to 10 feet of well screen depending on the total well depth. The screen length will be determined to allow a sand filter pack to extend at least one foot above the top of well screen, with two feet of bentonite on top of the sand pack. SWRNA will observe the installation of the overburden monitoring wells, record observations in a field log, develop the wells, and prepare soil boring/well construction logs following installation.

2. Soil Sample Collection. One soil sample will be collected from the boring through the building slab, and analyzed for VOCs, SVOCs, priority pollutant metals, and PCBs.

3. Groundwater Sample Collection. Groundwater samples will be collected from the overburden monitoring wells installed in AOC-1, and analyzed for VOCs. Groundwater samples will also be collected from the following seven (7) existing monitoring wells and analyzed for VOCs: MW05-08, MW05-09, MW05-14, MW05-15, MW05-16, MW05-17, and OB07-30. Laboratory analysis will be expedited (24-hour T.A.T.).

The wells will be purged of a minimum of three (3) volumes prior to collecting groundwater samples. NYSDEC will be notified if any wells are purged dry and do not recover over the course of two days to permit three volumes to be removed. For any such wells, groundwater samples may be collected if fewer than three volumes are removed, with NYSDEC approval.

4. Data Review. SWRNA will tabulate and summarize the groundwater and soil analytical data and review the analytical results with NYSDEC/NYSDOH to determine the need for any additional overburden monitoring wells in order to finalize the Remedial Design Document.

C. AOC-2 OVERBURDEN/WEATHERED BEDROCK CHARACTERIZATION

1. Monitoring Well Installation. Three (3) additional overburden/weathered bedrock monitoring wells will be installed in AOC-2 (Figure 3) at the following locations:

- In the parking lot approximately 50 feet south of existing well MW05-25
- Adjacent to the building, west of Boyd Avenue and across from existing well OW25-D
- Approximately 30 feet north of existing well BR07-29, at the tree line

AOC-2 wells will be installed using the same hollow stem auger drilling methods as used for previous overburden wells in this area. The well borings will be advanced until auger refusal at the top of competent bedrock, which is estimated to be approximately 30 to 35 feet below ground surface in AOC-2, and the well will be constructed of two-inch diameter PVC with 10 feet of well screen. A sand filter pack will extend at least one foot above the top of well screen, with two feet of bentonite on top of the sand pack.

2. Groundwater Sample Collection. Groundwater samples will be collected from the three (3) newly installed monitoring wells, plus the three (3) existing injection wells and two (2) existing observation wells previously installed in AOC-2, and analyzed for VOCs. Laboratory analysis will be expedited (24-hour T.A.T.).

The wells will be purged of a minimum of three (3) volumes prior to collecting groundwater samples. NYSDEC will be notified if any wells are purged dry and do not recover over the course of two days to permit three volumes to be removed. For any such wells, groundwater samples may be collected if fewer than three volumes are removed, with NYSDEC approval.

3. Data Review. SWRNA will tabulate and summarize the groundwater analytical data and review the analytical results with NYSDEC/NYSDOH to determine the need for any additional AOC-2 monitoring wells in order to finalize the Remedial Design Document.

D. SHALLOW SOIL SAMPLES

Figure 4 shows eight (8) locations from which shallow soil samples will be collected, to delineate contamination in the upper one foot of soil. The samples will be collected from locations without asphalt, concrete, or crushed stone cover, between the former manufacturing facility and the existing office building, and extending from MW05-02 (north) to the southern edge of the paved loading dock driveway. No soil samples are proposed for the area north of MW05-03, which is covered by a combination of crushed stone and concrete slabs for building structures, with no areas of exposed surface soil.

Soil samples will be collected from 0 to 12 inches below the grass root zone. At each location, vegetation will be removed, including roots. Two grab samples of soil will be

collected at each location, from 0 to 2 inches deep and from 2 to 12 inches deep, below the root zone.

The shallow soil samples will be analyzed for target compound list VOCs, SVOCs, priority pollutant list metals, and PCBs, with a 24-hour T.A.T. The analytical results will be reviewed with NYSDEC/NYSDOH, and the need for additional soil samples will be determined based on results. Additional shallow soil samples may be collected under this Work Plan for analysis, as jointly agreed to by NYSDEC, NYSDOH, and P&S, based on analytical results for the aforementioned shallow soil samples. Engineering controls to address soil contamination will be addressed as necessary in the Site Management Plan (SMP) for the site.

E. MW05-02 AREA

The location of MW05-02 is currently covered with soil, construction, and plant debris from clearing that occurred in that area. The debris pile will be removed to observe the condition of pavement in this area. Any debris that is removed and disposed of off-site will be disposed of properly. The pavement will be photographed, and the photographs provided to NYSDEC along with a written description. This information will be used to determine if the asphalt pavement can be considered an engineering control at this location, or if additional surface soil samples may be necessary around MW05-02 if the asphalt is not considered an engineering control.

REMEDIAL DESIGN DOCUMENT REVIEW


Following the installation of pre-design monitoring wells under this Work Plan and review of groundwater analytical results with NYSDEC/NYSDOH, the Remedial Design Document will be amended as needed to obtain NYSDEC/NYSDOH approval. The pre-design groundwater analytical results will be appended to the Document, and the target treatment zones for the AOCs will be confirmed on revised figures, which will include the final injection well and observation well networks. Dosage estimates and injection volumes will also be finalized for NYSDEC/NYSDOH approval.

SCHEDULE

A pre-design work schedule is shown as Figure 5.

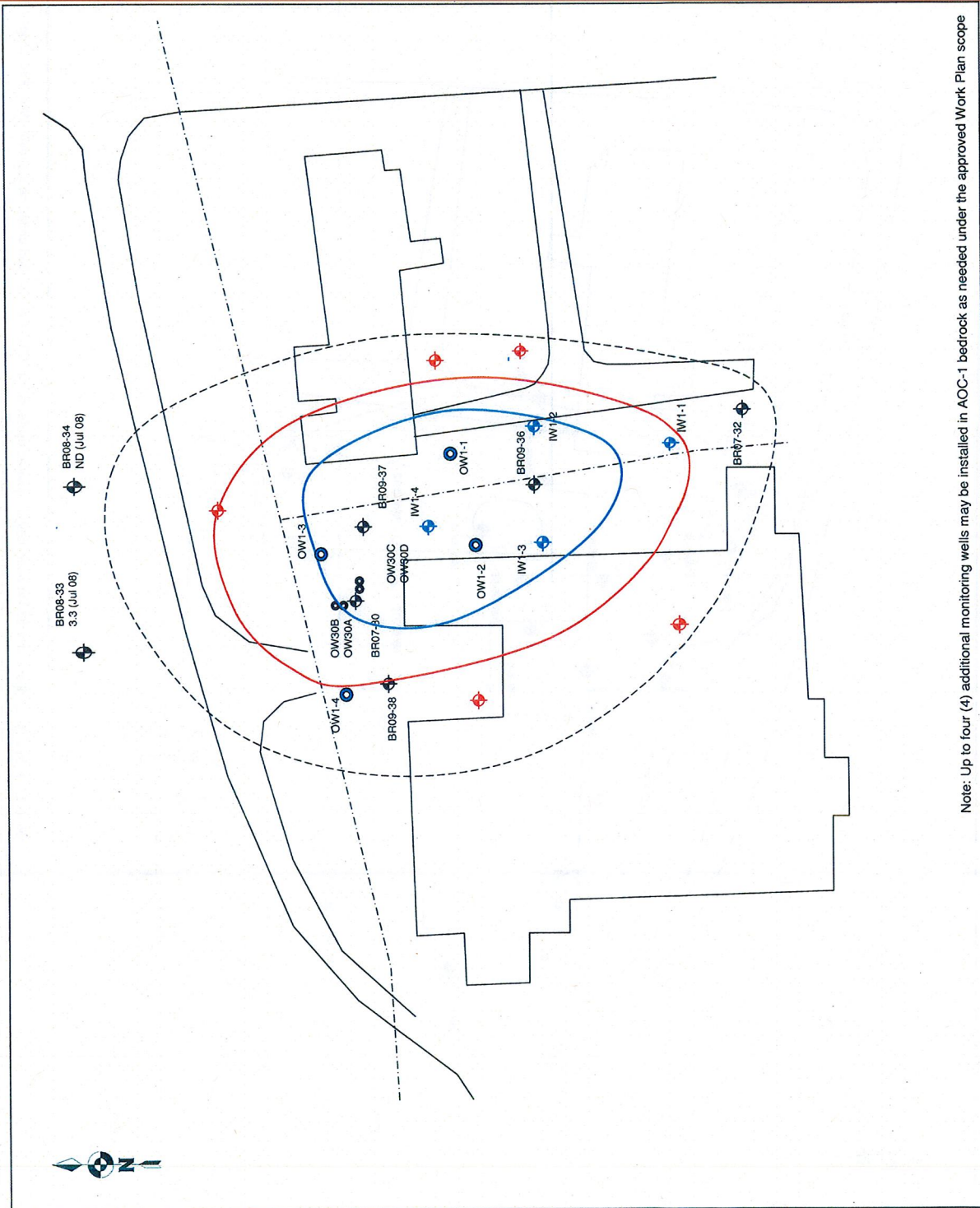
If you have any questions please feel free to call me at (315) 422-4949.

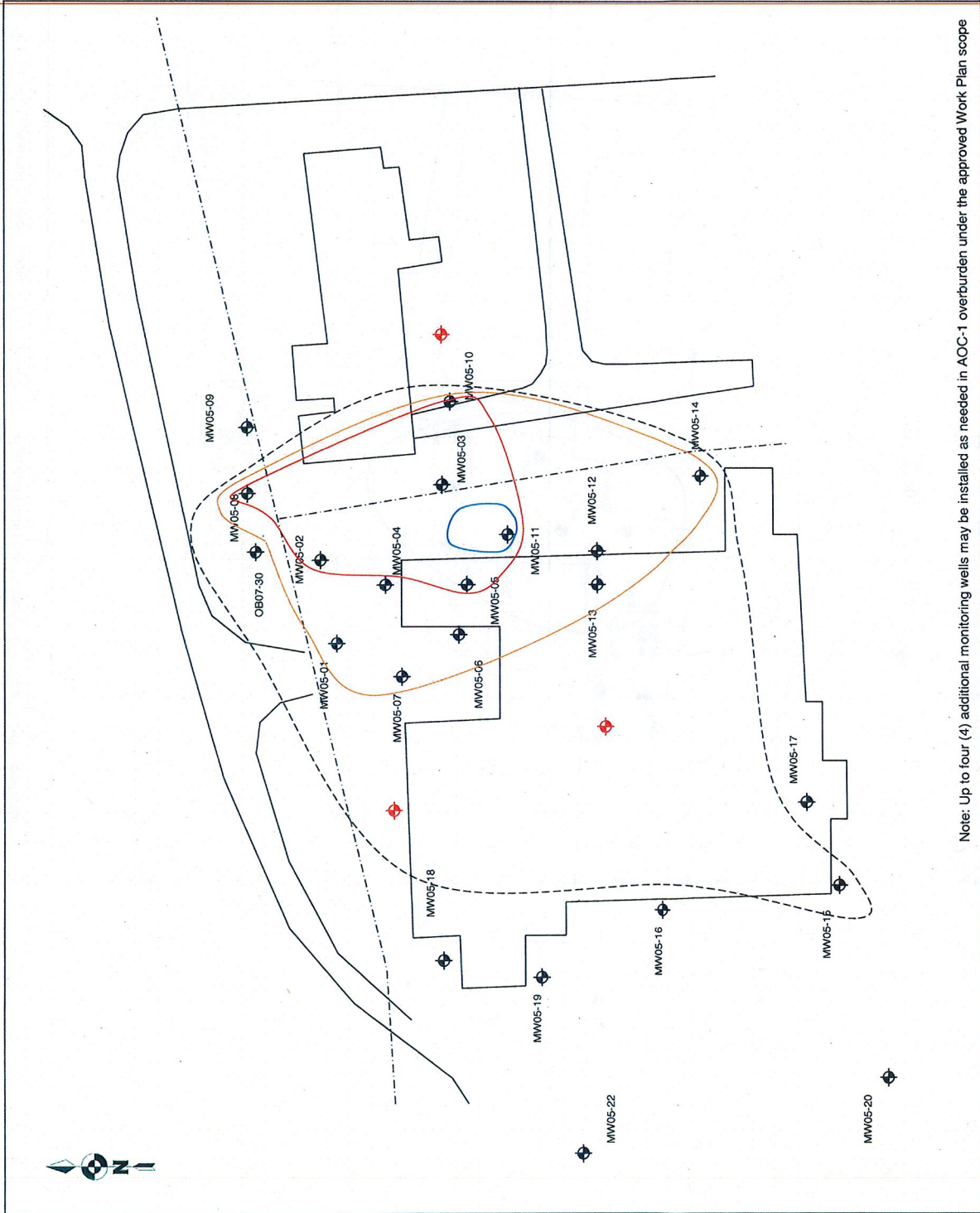
Very truly yours,
S&W Redevelopment of North America, LLC

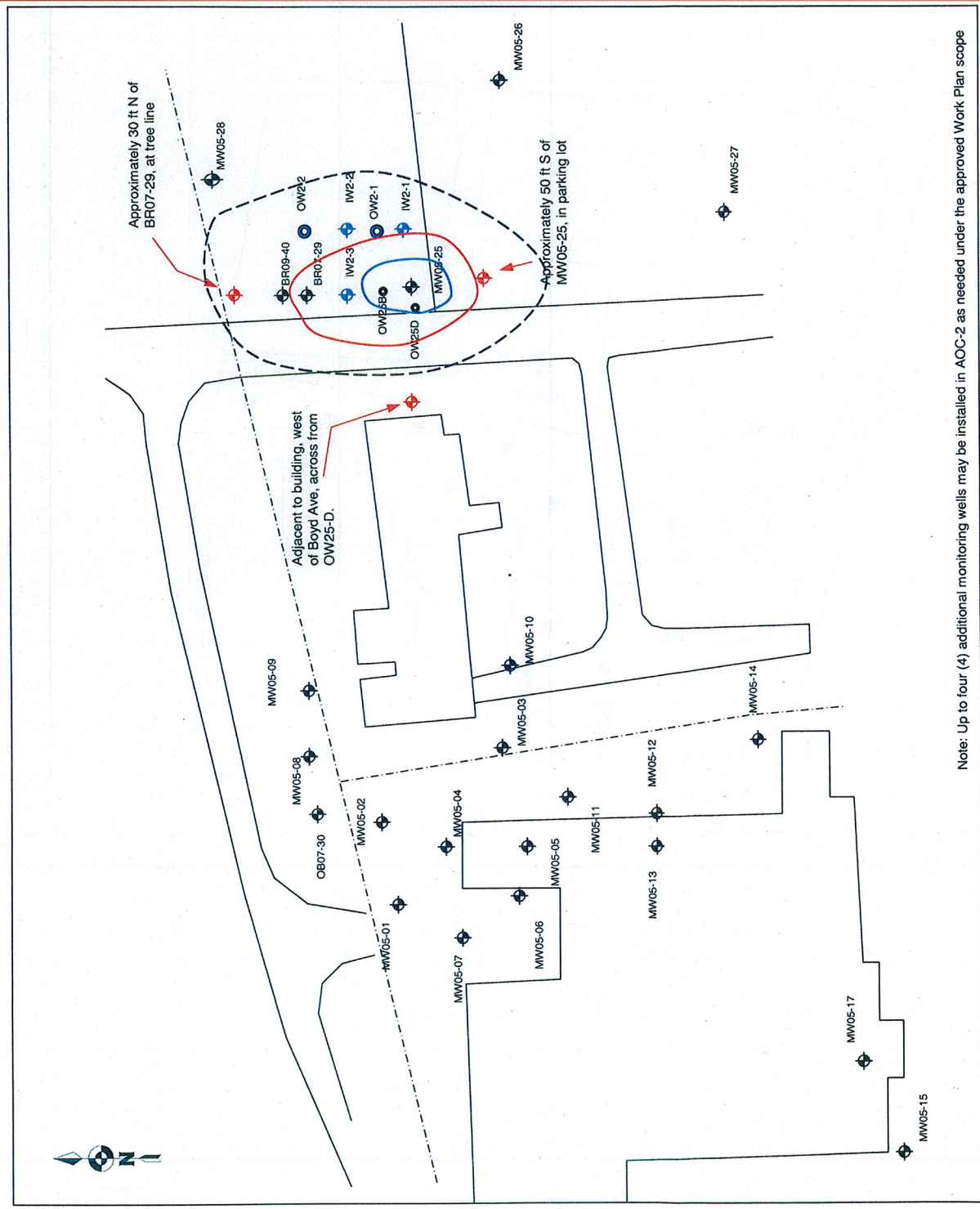
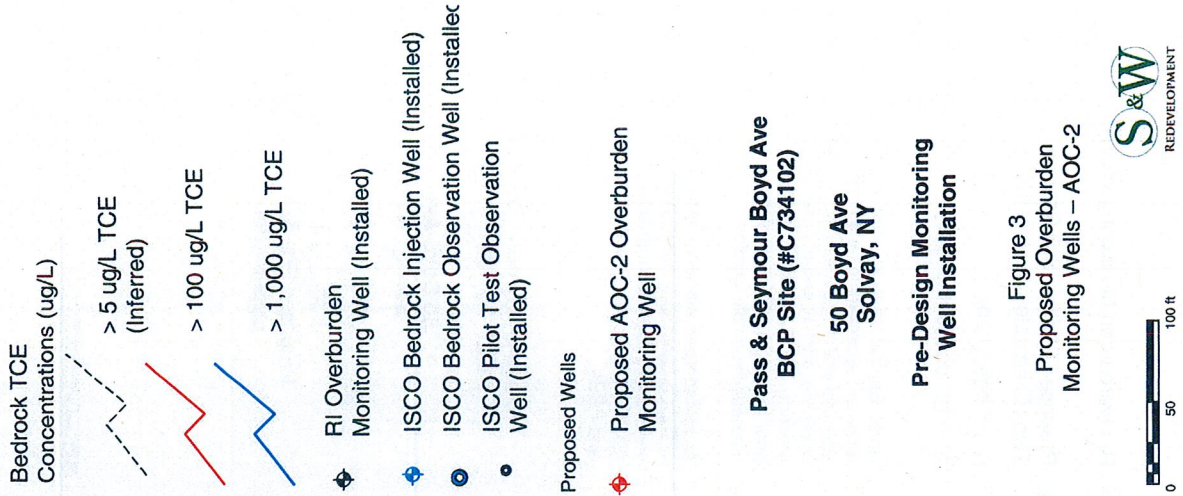


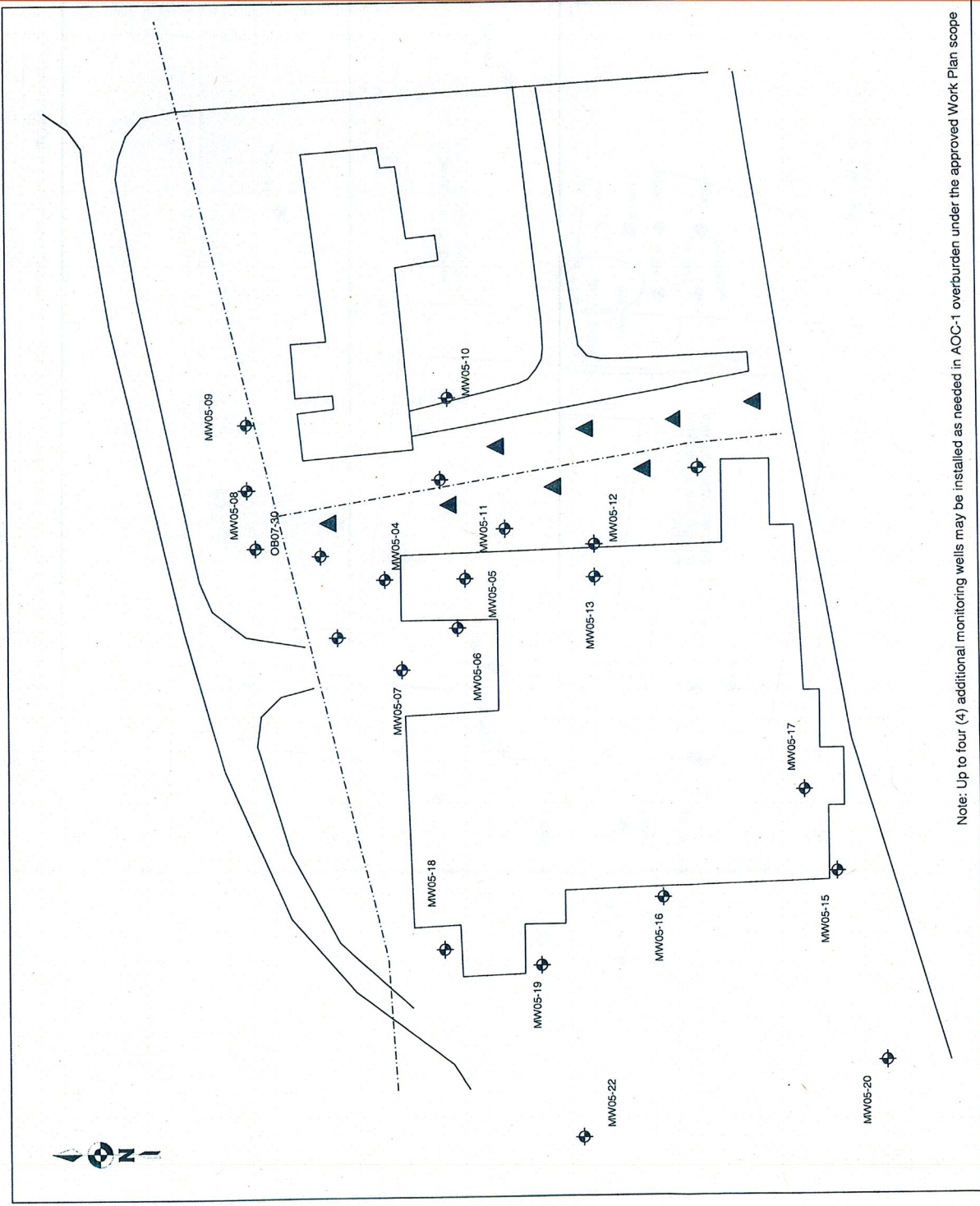
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President

cc: Patrick Davin, Pass & Seymour
Larry Richards, Pass & Seymour
Doreen Simmons, Hancock & Estabrook
Greg Townsend, NYSDEC
Melissa Menetti, NYSDOH









Note: Up to four (4) additional monitoring wells may be installed as needed in AOC-1 overburden under the approved Work Plan scope

- ◆ RI Overburden Monitoring Well (Installed)
- ▲ Proposed Shallow Soil Sample Two (2) samples per location:
0 - 2" bgs (grab)
2" - 12" bgs (composite)

Note: Sample locations west of the fence are approximate, and may be adjusted where impenetrable ground cover (i.e. asphalt and/or concrete) is present. NYSDEC will be notified prior to sample collection of significant changes in sample location.

All soil samples will be analyzed for volatile organic compounds (VOCs), semivolatile organic compounds (SVOCs), target analyte list metals, and PCBs.

Pass & Seymour Boyd Ave
BCP Site (#C734102)

50 Boyd Ave
Solvay, NY

Figure 4
Proposed Soil Samples
Upper 1 Foot



