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August 9, 2013

Mr. David Szymanski
Project Manager
New York State Department of Environmental Conservation
Division of Environmental Remediation
625 Broadway, 11th Floor
Albany, NY 12233-7011

RE: Corrective Measures Work Plan
Mineral Springs Road Former Manufactured Gas Plant Site

Dear Mr. Szymanski:

On behalf of National Fuel Gas Distribution Company (NFG) AECOM is submitting this Corrective Measures Work Plan (CMWP) to address suspected purifier box waste materials observed along the western property boundary at NFG's Mineral Springs facility located at 365 Mineral Springs Rd, in West Seneca, NY. The CMWP was prepared in response to the Department's letter of July 22, 2013. If you have any comments or questions about the planed corrective measure, please call Brad Walker at 716-667-5559.

Regards,

Thomas P. Clark, P.E.
Senior Engineer

cc: B. Walker – NFG
T. Alexander – NFG
S. Messier – NYSDOH
R. Kennedy – Hogdson Russ LLP
T. Raby, AECOM

AECOM Environment

Prepared for:
National Fuel Gas

Prepared by:
AECOM
Chelmsford, MA 01824

August 9, 2013

Corrective Measures Work Plan
Fence Replacement Area

Mineral Springs Road Former Manufactured Gas Plant Site
West Seneca, New York

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Corrective Measures Work Plan
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Mineral Springs Road Former Manufactured Gas Plant Site
West Seneca, New York

Prepared By Thomas P. Clark, P.E.

Reviewed By Tamara Raby, Project Manager

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List of Acronyms

µg/m^3	micrograms per cubic meter
CAMP	Community Air Monitoring Plan
CMWP	Corrective Measures Work Plan
HASP	Health and Safety Plan
MGP	Manufactured Gas Plant
NFG	National Fuel Gas
NYSDEC	New York State Department of Environmental Conservation
O&M	Operations and Maintenance
PID	photoionization detector
SVOCs	Semivolatile Organic Compounds
TCLP	Toxicity Characteristic Leaching Procedure
VCA	Voluntary Cleanup Agreement
VOCs	Volatile Organic Compounds

1.0 Introduction

This document presents the Corrective Measures Work Plan to address suspected purifier box waste materials observed along the western property boundary. This work plan is in response to the New York State Department of Environmental Conservation's (NYSDEC) letter dated July 22, 2013.

2.0 Background

National Fuel Gas' (NFG's) Mineral Springs facility at 365 Mineral Springs Rd, in West Seneca, New York (Site), is the former site of a manufactured gas plant (MGP). A remedial action to address MGP residues in soil was completed in 2001. In June 2013, as part of security upgrades at the facility, new perimeter chain-link fencing was installed along the western site boundary and southwestern corner. NFG hired an environmental contractor to drill the fence post holes. The fence post drilling was performed between June 24 -28, 2013. On June 26, 2013 suspected purifier box wastes were encountered while advancing four new fencepost holes near the southwestern corner of the Site. These locations, shown on Figure 1, are within NFG's property boundaries.

NFG immediately notified NYSDEC of the materials encountered. All suspect materials encountered in the fence post holes were placed in a single new 55-gallon drum for subsequent sampling and disposal.

On July 19, 2013 the NYSDEC notified NFG of a citizen's complaint regarding the presence of blue waste material on NFG property, behind the residents' property on Calais Street. This material appeared to result from the fence installation process. NFG's spill response contractor responded to the site, removed the material, placed it in a single new 55-gallon drum, and the area was covered with plastic sheeting pending further evaluation. A NYSDEC representative was present on site to observe this work.

An additional complaint was received on July 25 from another resident on Calais Street, indicating more suspect material found on NFG property, adjacent to the resident's property. This area was also covered with plastic sheeting. A NYSDEC representative was present on site to observe the additional area and suspect materials on July 25.

In response to these events and consistent with the provisions of NFG's Voluntary Cleanup Agreement (VCA number B9-0538-98-08), the 2002 Operations and Maintenance (O&M) Plan, and the Deed Restrictions, NFG has prepared this Corrective Measures Work Plan (CMWP).

3.0 Environmental Conditions

Suspected purifier wastes were encountered during new perimeter fence installation in June 2013. The locations where these fence posts were installed are shown on Figure 1. Following observation of blue green stained soil during and following fence post installation, NFG inspected the area and identified an area where impacts are visible. This area is shown on Figure 2.

4.0 Proposed Remedial Action

4.1 Site Preparation

Site preparation activities will include installation of temporary fencing, installation of erosion and sediment controls, surveying to establish baseline conditions and grades, utility location and protection, and clearing of vegetation. Dust control will be implemented including wetting soils with water, limiting the size of open excavations, covering unprotected soils with plastic sheeting or foam, and stopping excavation during periods of high wind.

4.2 Description of the Corrective Measure

Site restoration measures including re-grading the area between the new fence and NFG property boundary were scheduled as part of the original perimeter fence replacement, These measures were originally planned to maintain the natural southward flow of runoff and reduce pooling of water during the spring time and wet weather events. These re-grading efforts will be implemented as part of the environmental evaluation of this area and corrective measures to remove suspected purifier wastes.

A drainage swale will be excavated approximately two feet from the property boundary (on NFG property), from the northern limit of the area of concern southward to the existing drainage feature in the southwest corner of the property. This swale will maintain the current overland runoff flow direction and to eliminate pooling during wet weather events. During the excavation of the swale, site soils will be observed for the presence of suspected purifier wastes and screened with a photoionization detector (PID). All excavated soils, unless determined to be native and unimpacted, will be characterized, and properly disposed of off-site. If suspected purifier wastes are encountered, these materials will be excavated and removed to a depth of two feet below final grade. To prevent undermining of the newly installed fence, excavations will not exceed two feet below final grade. Any remaining suspected purifier wastes will be capped in accordance with the Remedial Design / Work Plan (RETEC, 1998). The clay cap will consist of a nine-inch minimum clay cap and covered with either a three-inch topsoil cover or geotextile fabric and landscape stone.

4.3 Additional Perimeter Fencing

Following the Site restoration activities, additional new chain-link fence will be installed along the western property line in the area of concern as shown on Figure 2. The new fence will be installed to maintain Site control and prevent access to NFG property. This fence will be connected to the existing (new) fence at the northern limit of the area of concern and extend southward along the western property boundary. The fence will terminate at the southern property boundary.

Before work begins, NFG will notify NYSDEC of the proposed schedule. No work will start until NYSDEC approves this CMWP.

4.4 Waste Management

All excavated soils will be sampled for waste disposal characterization to include the following:

TCLP VOCs, TCLP SVOCs, TCLP Metals, Total Cyanide, Reactive cyanide, pH, Ignitability, and Reactivity. No material shall be transported off-site except to a permitted disposal or treatment facility, for which waste characterization will be necessary. All transport of materials will be performed by NFG approved licensed haulers and in accordance with appropriate local, State, and Federal regulations, including New York Codes, Rules and Regulations (NYCRR) in 6 NYCRR Part 364. Approved haulers will be appropriately licensed and trucks properly placarded.

Material transported by trucks exiting the site will be secured with tight-fitting covers. No material containing free liquids will be transported. Trucks will be prohibited from stopping and idling in the neighborhood outside the project site. Egress points for truck and equipment transport from the site will be kept free from soil and other material during transport.

All soil waste excavated and removed from the Site will be treated as contaminated and regulated material and will be transported and disposed in accordance with all local, State (including 6 NYCRR Part 360) and Federal regulations. Any approved materials transported off-site shall only be transported to a permitted disposal or treatment facility identified by NFG. Required characterization samples for the waste will be collected and analyzed as part of additional site characterization as described previously.

Non-hazardous historic fill and contaminated soils taken off-site will be handled, at minimum, as a Municipal Solid Waste per 6 NYCRR Part 360-1.2.

5.0 Health and Safety

There are physical hazards which may be present at the Site associated with existing conditions and with investigation activities. Potential physical hazards include the following:

- Traffic – Requires care when entering and leaving the Site.
- Overhead and underground utilities – high voltage overhead and buried power lines exist along the Southern boundary. Any excavation and fence installation work performed in this area has a potential for encountering these utilities.
- Mechanical equipment including trucks and excavators.
- Slips, trips, and falls – General site hazards including uneven terrain, open excavations, and work related debris and equipment present potential tripping hazards.
- Exposure to hazardous wildlife and plants.

As indicated previously, post-remedial data collection activities have been performed at the Site annually since 2002. Data from those investigations indicate that MGP residuals are present in soils and groundwater at the Site.

All construction and oversight personnel will be bound by the provisions of the Health and Safety Plan (HASP) and NFG's contractor H&S requirements. All field staff are required to participate in a preliminary project safety meeting to familiarize them with the anticipated hazards and respective onsite controls. The discussion will cover the entire HASP subject matter, putting emphasis on critical elements of the plan; such as the emergency response procedures, personal protective equipment, site control strategies, and monitoring requirements. In addition, daily tailgate safety meetings will be held to discuss the anticipated scope of work, required controls, new hazards and controls, incident reporting, review the results of inspections, any lessons learned or concerns from the previous day. Attendance rosters from all safety meetings will be signed by all present and incorporated into the project records. Health and Safety protocols for the Site are presented in the Site Specific HASP, which is included as an attachment.

6.0 Community Air Monitoring Plan

Air monitoring will be performed to verify that contaminants from the site do not impact nearby residents or visitors during site characterization or construction in accordance with NYSDEC's Generic Community Air Monitoring Plan (Generic CAMP). Temporary monitoring stations will be installed to provide continuous real-time monitoring at the upwind and downwind work perimeters. Monitoring will be performed for particulates with a diameter of 10 micrometers or less (PM-10). An additional monitoring station will be placed between the work area and the nearest residence.

Particulate monitoring will be performed using real-time monitoring equipment capable of measuring PM-10 particulate matter and capable of integrating over a period of 15 minutes (or less) for comparison to the airborne particulate action level. The equipment will be equipped with an audible alarm to indicate exceedance of the action level.

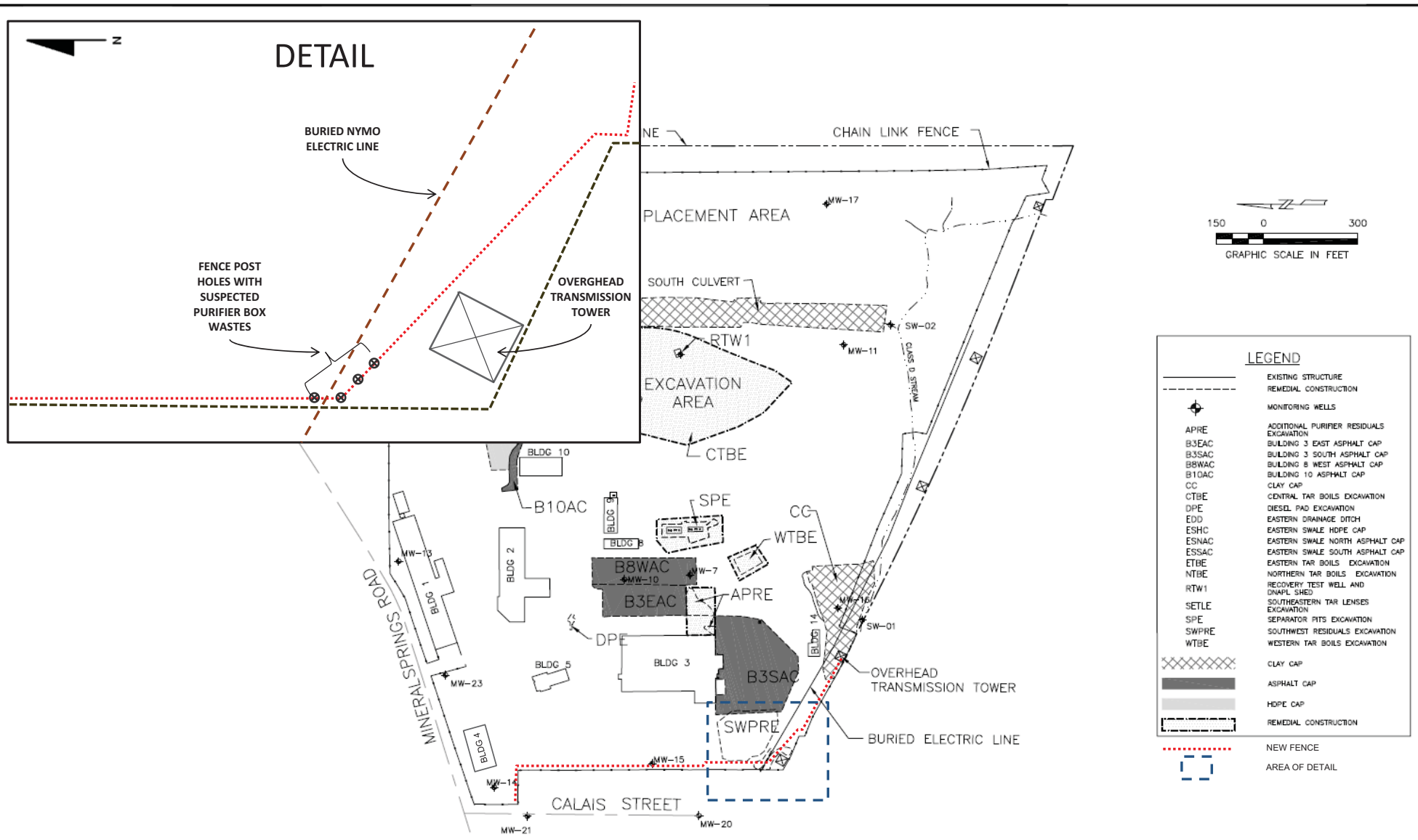
Response levels and mitigation requirements for PM-10 include the following:

- Greater than 100 micrograms per cubic meter ($\mu g/m^3$) above background as a 15-minute average or if visible dust is observed – Implement dust suppression techniques.
- If implementation of dust suppression techniques does not reduce PM-10 concentrations below 150 $\mu g/m^3$ above background, work must be stopped and activities re-evaluated.
- If visible dust is generated, work will stop until effective mitigation has been implemented.

7.0 Schedule

A schedule will be developed following approval of this CMWP. A copy of the schedule will be sent to the NYSDEC.

Figures



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MINERAL SPRINGS ROAD FACILITY NATIONAL FUEL GAS 60250836.300	Fence Post Locations
DATE: 03/26/13 DRWN: BcV	FIGURE 1

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MINERAL SPRINGS ROAD FACILITY NATIONAL FUEL GAS 60250836.300			**PROPOSED CORRECTIVE MEASURE**
DATE: 08/08/2013	DRWN: BcV		**FIGURE 2**

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Attachment A

Health and Safety Plan