September 28, 2011

To:       Diane Carlton, NYSDEC, Region 7 (1 PDF)
          Holly Sammon, Onondaga County Public Library (1 bound)
          Samuel Sage, Atlantic States Legal Foundation (1 bound)
          Joseph J. Heath, Esq., Onondaga Nation (cover letter )

Re:       Letter of Transmittal – Willis Ave/Senet Repository Addition

The below document has been approved by the New York State Department of Environmental Conservation (NYSDEC) and is enclosed for your document holdings:

- Enclosed I-690 Storm Drain System – State Fair Blvd Drainage Ditch Soil Sampling Work Plan

Sincerely,

John P. McAuliffe, P.E.
Program Director, Syracuse

Enc.

cc: Tracy A. Smith - NYSDEC
June 16, 2011

Alfred J. Labuz
Honeywell International, Inc
301 Plainfield Road, Suite 330
Syracuse, New York 13212

Re: I-690 Storm Drainage System
State Fair Boulevard Drainage Ditch Soil Sampling Work Plan

Dear Mr. Labuz:

The New York State Department of Environmental Conservation (NYSDEC) has reviewed the referenced revised work plan dated June 9, 2011.

Based on our review, the work plan is approved.

If you have any questions, please contact me at (518) 402-9676.

Sincerely,

Donald J. Hesler
Section Chief, Section B

cc: John McAuliffe - Honeywell
Robert Nunes - USEPA, NYC
Mark Sergott - NYSDOH
John Davis, NYSDOL
Tara Blum
Joseph Heath, Onondaga Nation
Thanh Joyal, Onondaga Nation
Jeanne Shenandoah
Fred Kirschner, AESE
Curtis Waterman
Alma Lowry
Christopher Calkins, OBG
June 9, 2011

Mr. Donald Hesler
New York State Department of Environmental Conservation
Remedial Bureau D
625 Broadway
Albany, New York 12233-7016

Re: I-690 Storm Drain System – State Fair Boulevard Drainage Ditch Soil Sampling Work Plan

Dear Mr. Hesler:

This letter work plan presents the scope and procedures for soil sampling to support the proposed remediation work at the State Fair Boulevard drainage ditch associated with the I-690 Storm Drainage System in Solvay, New York. Based on a review of the previously collected data in the drainage ditch, the NYSDEC requested in their April 1, 2011 letter to Honeywell that additional soils data be collected in the drainage ditch prior to support the remedial design. This letter work plan also incorporates the May 26, 2011 NYSDEC comments on the April 26, 2011 letter Work Plan submitted by Honeywell. A project site plan is provided as Figure 1.

Project Background

Phase 3 of the I-690 Storm Drain Modification/Temporary Trench Installation Project involved decommissioning of the underdrain isolation pilot study system, and installation of cured in-place pipe and underdrain conveyance piping in portions of the storm drain system.

The May 22, 2009 letter regarding the Willis Ave/Semet Tar Beds IRM I-690 Storm Drain Modifications/Temporary Trench Installation Phase 3 – Post Construction Inspection and Sampling summarized the results of the post-construction sampling and presented recommendations for corrective actions. The recommendations were for further inspection of manhole MH-1, corrective action for catch basins DR-41 and DR-45, and additional sampling. These corrective actions were performed in the summer and fall of 2009. A letter was submitted to the NYSDEC on May 3, 2010 summarizing the repair work and recommendations for additional sampling. The NYSDEC approved this work plan on July 8, 2010.

The Phase 3 – Post Construction repair sampling included additional storm water samples being collected in the eastern and western storm drainage systems. Also, surface soils (0-6 in.) samples were collected in the State Fair Boulevard ditch to evaluate potential impacts from ditch soils to the I-690 drainage system storm water. These ditch soils were found to contain benzene, chlorinated benzenes, and mercury. The proposed sampling information discussed below will provide information to facilitate finalization of the I-690 Phase 4 remedial design.
Field Investigation and Sampling Plan

Marking of Final Sampling Locations in the Field
A meeting will be held in the field with the NYSDEC to agree on the placement of the final sample locations. Proposed investigation locations are presented on Figure 1.

Marking of Subsurface Utilities
Dig Safely New York will be contacted prior to the initiation of intrusive work at the project area. A date and time will be established for the various utility companies to meet an O’Brien & Gere representative and mark the locations of subsurface utilities in the areas of proposed work.

State Fair Boulevard Ditch Soils Characterization
Objective: State Fair Boulevard Ditch soils will be collected along the centerline of the ditch to further characterize this area to support the remedial design.

Approach: Surface soils will be collected from ten locations by boring with a hand auger. The ten locations, marked in red on Figure 1, will be sampled from the 0-1 ft and 1-2 ft intervals along the centerline of the ditch. The actual locations will be determined in the field, in concurrence with Honeywell and the NYSDEC. Photographs will be taken at each soil sampling location to document the general conditions around each of the sampling locations.

Soil samples will be submitted to a New York State-certified laboratory for analyses by USEPA SW846 methods (USEPA, 2004). These samples will be analyzed for TCL/TAL parameters using methods 8260B and 7471A for the full USEPA TCL list for VOCs (including 1,2-, 1,3-, and 1,4-dichlorobenzene) and mercury, respectively. A sample summary matrix is provided as Table 1.

Site Survey
A sample location survey will be performed by a NYS Licensed Surveyor following the completion of the State Fair Boulevard ditch investigation. The New York State Plane coordinates (NAD 83) will be determined, and the ground surface elevation and top of casing elevation (NAVD 1988) will be surveyed to a vertical of 0.01 ft at sampling locations. A limited number of pertinent site features will be surveyed to allow for accurate placement of sampling locations on existing maps.

Report
A letter report will be submitted to the NYSDEC for review within 60 days after completion of the work described above. The letter report will summarize the approach and results and include a figure presenting sampling locations, tabulated analytic results, and recommendations for further action, if warranted.

Schedule
This work will begin within 10 working days of the acceptance of this work plan.
Please contact me if you have any questions regarding this matter.

Sincerely,

Alfred J. Labuz
Remediation Manager

Attachments

cc:  Argie Cirillo, Esq.  USEPA (ltr only)
     Mr. Robert Nunes  USEPA, Region II (1 copy & cc)
     Ms. Tara Blum  NYSDEC, Region 7 (cc)
     Ms. Sandy Lizlovs  NYSDEC, Region 7 (cc)
     Mr. Steven Bates  NYSDOH (1 copy, 1 CD)
     Mr. Geoffrey Laccetti  NYSDOH (cc)
     Brian D. Israel, Esq.  Arnold & Porter (cc)
     Mr. William Hague  Honeywell (cc)
     Mr. John P. McAuliffe, P.E.  Honeywell (ltr only)
     Mr. John Davis  NYSDOL (1 copy)
     Joseph J. Heath, Esq.  Onondaga Nation (cc)
     Thane Joyal, Esq.  Onondaga Nation (cc)
     Ms. Jeanne Shenandoah  Onondaga Nation (1 copy, ec)
     Mr. Fred Kirshner  AESE, Inc. (cc)
     Mr. Curtis Waterman  Onondaga Nation (ec)
     Ms. Alma Lowry  Onondaga Nation (ec)
     Ms. Heidi Kuhl  Onondaga Nation (1 copy)
     Mr. Steven Miller  Parsons (CD/hec cov ltr)
     Mr. Thomas Conklin  O'Brien & Gere (cc)
     Mr. Christopher Calkins  O'Brien & Gere (cc)
## Table 1
**Honeywell**
**I-690 Phase 4 - State Fair Boulevard Ditch**
**Ditch Soil Investigation**

<table>
<thead>
<tr>
<th>Matrix/Analysis</th>
<th>Method</th>
<th>Samples</th>
<th>MS</th>
<th>MSD</th>
<th>Field Duplicates</th>
<th>Equipment Blanks</th>
<th>Trip Blanks</th>
<th>Total Samples</th>
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<tbody>
<tr>
<td>Ditch Soils (10 locations; 2 samples per location)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
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<td></td>
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<tr>
<td>TCL VOCs&lt;sup&gt;1&lt;/sup&gt;</td>
<td>8260B plus 10 TICs</td>
<td>20</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>2</td>
<td>26</td>
</tr>
<tr>
<td>Mercury</td>
<td>7471A</td>
<td>20</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>0</td>
<td>24</td>
</tr>
</tbody>
</table>

**Notes**

All analyses will be performed in accordance with USEPA SW846 methods.

MS/MSD - Matrix Spike/Matrix Spike Duplicate

<sup>1</sup>VOC analysis will include 1,2-dichlorobenzene, 1,3-dichlorobenzene, and 1,4-dichlorobenzene