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October 23, 2009

VIA ELECTRONIC AND FIRST CLASS MAIL

RECEIVED
OCT 26 2009
DEP-REGION 8

Mr. Roger McDonough
Environmental Analyst
New York State Department of
Environmental Conservation
Division of Environmental Permits
6274 East Avon-Lima Road
Avon, NY 14414-9519

Re: *Inergy Midstream/Finger Lakes LPG Storage, LLC*
Liquefied Petroleum Gas Storage Facility
Town of Reading, Schuyler County

Dear Mr. McDonough:

We are in receipt of your October 19, 2009 letter to Gordon Wright regarding lead agency. The purpose of this letter is to provide additional information responsive to the issues raised by the Department of Environmental Conservation ("Department" or "DEC") Region 8 Division of Water Staff as set forth in your letter. In addition, this is to once again request that the Department allow the Town to be lead agency over its site plan review or agree to a segmented review under 6 NYCRR § 617.3(g) (so that the Town would be lead agency for all site issues and the DEC would be lead agency for the underground gas storage application).

As you may be aware, Finger Lakes LPG Storage, LLC (Finger Lakes) submitted its application to the Town of Reading (Town) for a special permit under its Land Use Law on or about September 1, 2009. Pursuant to the SEQRA regulations, the Town sought lead agency and sent out lead agency coordination letters to involved agencies. On October 1, 2009, DEC responded stating that it wished to be lead agency, citing the 1992 Final Generic Environmental Impact Statement (FGEIS)[1] for the Oil, Gas & Solution Mining Regulatory Program and Department

[1] On October 13, I e-mailed Lisa Schwartz, Jennifer Hairie, Peter Lent and you with Page 15 of the FGEIS to show that the quoted language in your letter of October 1 was referring to drilling permits

policy. We received this letter on October 5 and I immediately contacted the Regional Attorney, Regional Permit Administrator and Jennifer Hairie, Bureau Chief and Program Counsel in Central Office by e-mail. In this communication, I asked DEC to reconsider its position. On October 7, I met with Jennifer Hairie in Albany and Assistant Regional Attorney Lisa Schwartz joined by phone. At that time, we discussed the lead agency issue and the necessity of a dam permit.

On the same day this meeting occurred (which you were not aware of) you issued a second letter to the Town dated October 7, 2009, in which you identified the need for a dam permit and an underground storage permit and the possibility of other permits, including a modification to US Salt's SPDES permit. Your description of the SEQRA process and the process under Part 621 is the very reason why we need the Town to be lead agency for its own site plan review. As I explained during my meeting/call with Ms. Hairie and Schwartz, if Finger Lakes must wait until the Underground Storage Permit is issued before SEQRA is complete, this would likely result in the loss of one full season of providing critical gas storage services (for which customers have already been obtained).

Upon our receipt of the Department's October 7 letter (received on October 10), I communicated by e-mail with Ms. Hairie, the Regional Attorney, the Regional Permit Administrator, and the Regional Director requesting that the DEC allow the Town to be lead agency, disputing the need for a dam permit, and responding to the possible need to modify US Salt's SPDES Permit. We also indicated that the Project had already received from DEC an acknowledgement of Finger Lakes' Notice of Intent under the SPDES Stormwater General Permit (on September 10) and a 5-acre waiver (on September 15) with regard to soil disturbance under the General Permit.

In a letter dated October 9, 2009, the Department issued a correction, noting that a dam permit was not necessary, but indicating that "other issues in the October 7 letter remain." This letter also indicated that the Town had granted DEC an extension of time for establishing lead agency, to October 28, 2009.

In your most recent letter dated October 19, 2009, you ask the Town if it has made a decision regarding lead agency (although it would appear the Town is the agency waiting on a decision from DEC). At a meeting held on October 15, 2009, the Town Planning Board did not make a decision on lead agency and is awaiting the Department's response to the Applicant's request that it reconsider its position. That is one of the purposes of this letter.

One other reason for this letter, as noted above, is to respond to other comments in your October 19 letter. First, it is surprising that when Mr. Newell phoned you on October 13, 2009, he did not inform you that revised drawings were provided to the Planning Board on October 1, 2009. However, beyond that, at our meeting with the Town Planning Board on October 15, 2009,

Richard Wakeman, a geotechnical engineer with C.T. Male Associates,[2] made a presentation addressing Mr. Newell's concerns. Enclosed as Exhibit 2 is a memo from Mr. Wakeman describing the geotechnical work performed at the site and a description of the design of the brine pond to ensure structural integrity. We believe Mr. Wakeman's memo and drawings attached thereto more than adequately responds to Mr. Newell's concerns.

Further, any runoff from the watershed upgradient of the pond will be diverted around the pond via man-made swales. Therefore, the only stormwater inflow to the pond will be through direct precipitation (i.e. rain and snow falling directly into the pond). The mean annual precipitation at this location is approximately 32 inches, while the mean annual free water surface evaporation from shallow lakes at this location is approximately 29 inches. Therefore, a net annual increase in depth of approximately three inches can be expected due to direct precipitation into the pond. The 24 inches of freeboard provided in the design is adequate to account for this annual increase, and for any reasonably expected variations in annual precipitation and evaporation rates.[3] Further, no multi-year increase is expected because the pond will be drained each winter. Based on the above considerations, no stormwater discharges requiring a SPDES permit should occur from the pond.

With regard to any other potential discharge from the lined brine pond, while none is planned, there will be piping installed to ensure that should there be any excess brine, it can be piped to US Salt for use in the brine production process, but not discharged under US Salt's SPDES permit. Therefore, no modification to US Salt's SPDES permit is necessary or required. This may have been what you understood as a result of our pre-application meeting in February.

Finally, while it is true that the Underground Storage Permit Application identifies a potential total storage capacity of approximately 6 million barrels (5 million barrels for Gallery 1 and 1 million barrels for Gallery 2), the initial contracts in place are for a total of 2 million barrels of product (1.5 million barrels of propane and 500,000 barrels of butane). Thus, the current request for approval from the Town for an approximately 2.1 million barrel brine pond is sufficient at this time. Clearly, once permitted, in order to utilize the full capacity of the galleries, additional brine pond storage would have to be identified and permitted.

In summary, this is to request that the Department allow the Town to be the lead agency for its site plan review. The Town has scheduled a public hearing for November 19, 2009. If the Town is designated lead agency before then, we would ask the Department to provide any final

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[2] Mr. Wakeman's *curriculum vitae* is attached as Exhibit 1.

[3] The precipitation figure cited is based on a map entitled "Mean Annual Runoff, Precipitation, and Evapotranspiration in the Glaciated Northeastern United States, 1951-80", published by the United States Geological Survey (USGS). The evaporation figure cited is based on maps presented in the "Evaporation Atlas for the Contiguous 48 United States", published by the National Oceanic and Atmospheric Administration (NOAA) in June 1982.

comments on environmental issues (not relating to the Underground Storage Permit) and transmit those to the Town and the Applicant for consideration, review and response.

Sincerely,

BOND, SCHOENECK & KING, PLLC

Kevin Bernstein

Kevin M. Bernstein jid

Enclosures

cc: Gordon Wright, Town of Reading Planning Board
Hank Wodarski, Town of Reading Code Enforcement Officer
Jack Dahl, DEC
Linda Collart, DEC
Dixon Rollins, DEC
Peter Lent, DEC
Randall Nemecek, DEC
Jennifer Hairie, Esq., DEC
Lisa Schwartz, Esq., DEC
Leo Bracci, Esq., DEC
Paul D'Amato, Esq., DEC
William R. Moler, Inergy Midstream
Barry Cigich, Inergy Midstream
Michael Armstrong, Finger Lakes
Jessica Skinner, JESS Engineering

Exhibit 1

RICHARD C. WAKEMAN, P.E.

Vice President, Civil Engineering Services/
Chief Geotechnical Engineer

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Mr. Wakeman has over 33 years of experience in geotechnical engineering of projects of varying scope and complexity. During this period he has developed subsurface investigation programs and performed geotechnical evaluations for buildings, water and petroleum storage tanks, grain silos, waterfront docking facilities, retaining structures, earth dams and reservoirs, and flash and municipal waste disposal sites. These evaluations have led to the development of earthwork and foundation recommendations, preparation of detailed plans and specifications, and supervision of construction inspection and material testing.

A partial listing of the earthen and concrete gravity dam projects he has worked on is given below. On two of these projects, Mr. Wakeman has served as an expert witness and participated in mediation and arbitration hearings to provide testimony in support of cases where the owner's of dams were damaged due to engineering errors or omissions and poor construction practices. Mr. Wakeman co-authored a technical paper on one of these cases and presented the case history at the 2004 Annual dam Safety Conference of the Association of State Dam safety Officials in Phoenix, Arizona.

Project Experience

Preliminary Geotechnical Evaluation, Nanotechnology Manufacturing Facilities, Luther Forest Technology Campus, Malta, New York. Project Manager responsible for preparing a preliminary geotechnical report and dynamic site response analysis for the site in Malta, New York proposed for a nanotechnology manufacturing facility. For this study, existing test boring data was utilized together with the information gathered from advancing a single cone penetrometer test. The analysis of this data resulted in the opinion that the fabrication building could be supported on a mat foundation and that the other structures could be supported on conventional spread foundations. The dynamic site response analysis was made using bedrock accelerations identified by the NYS Building Code that was in effect at that time.

Site Roadways, Luther Forest Technology Campus, Malta, New York. Project Manager responsible for developing foundation recommendations and providing construction phase services related to the construction of four (4) large pre-cast concrete arch culverts beneath access roads to the Luther Forest Technology Campus. Each of the culvert sites were underlain by relatively soft and compressible silt and clay soils. Embankment sections at these crossings ranged from 22 to 29 feet in height and would induce ground settlements of several inches. Due to concerns over developing excessive negative skin friction as a result of this settlement and developing a condition referred to as "lateral ground squeeze", two (2) of the structures could not be pile supported. Recommendations to support these structures on conventional spread foundations included the installation of vertical drains, the construction of steep reinforced earth embankments adjacent to these structures and the utilization of geofoam as backfill for the same. Vibrating wire piezometers were installed to monitor the pore water pressure dissipation and settlements platforms to monitor the progression of the ground settlements.

New Patient Pavilion, Harlem Hospital Center; New York, New York. Provided a peer review of a geotechnical report prepared for a 10 story building in New York City. In lieu of using deep drilled shafts socketed into bedrock to support the building, a report was prepared to recommend modifying of the ground conditions to an extent that would allow the use of conventional spread foundations. Compaction grouting was performed across the building footprint to eliminate the soil liquefaction potential and allow the building to be supported

on spread foundations proportioned for a bearing pressure of 4,000 pounds per square foot. Numerous post-treatment cone penetration tests were performed to confirm the ground modification (densification) was performed to the degree required. Provided full-time construction observation of the work and monitored ground vibrations and heave/settlement of the ground surface and adjacent structures.

Target Northeast Distribution Center; Wilton, New York. Project Manager responsible for the geotechnical engineering for a 1,600,000 SF regional distribution center. Developed subsurface investigation program, analyzed conditions disclosed and prepared earthwork and foundation recommendations for the building, mechanically stabilized earth retaining walls and pavements. Infilling of deep ravines for the site's development required that magnitude of ground settlement induced by the fill's placement be estimated and that its time rate of occurrence be predicted. During construction directed the activities of four (4) construction observers monitoring foundation and floor slab construction, structural steel erection, installation of underground utilities, pavement construction, and earthwork associated with site development.

Schenectady County Community College Additions; Schenectady, New York. Project Manager responsible for the geotechnical evaluation of the area around Schenectady County Community College where new additions were planned for construction. Responsibilities included management of subsurface investigation program, foundation evaluation, and construction quality control testing and inspection services. Unique site conditions resulted in the use of a combination of auger cast piles, minipiles, steel H-piles and spread foundations to support the additions and pedestrian bridge. Construction quality control services including inspection of pile load testing and driving program, review of vibration monitoring data relative to protection of historic structure and sensitive computer equipment, monitoring of grout stabilization of 5-story stair tower foundation, and inspection and testing of fill/backfill placement and compaction, reinforcing steel placement, and concrete construction.

Quad Graphics, Inc.; Saratoga Springs, New York. Project Manager responsible for the geotechnical evaluation of the phased construction of a 500,000 square foot printing plant. Developed and supervised test boring and cone penetration testing program. Provided recommendations for design of building foundations, and floor slabs supporting printing presses sensitive to settlement and areas supporting 1,400 pounds per square foot of load. Dynamic deep compaction was used to densify the loose granular soils underlying the plant site. Construction quality control duties included cone penetration testing evaluation to determine adequacy of dynamic deep compaction.

State Farm Insurance Agency Regional Headquarters; Malta, New York. Project Manager responsible for the geotechnical evaluation of a 200 acre parcel where the construction of the northeastern regional headquarters of a national insurance company was proposed. Developed and supervised the subsurface investigation program, and provided recommendations for the earthwork and foundation design of the 340,000 square foot facility as well as recommendations for the design of roadways, parking lots and stormwater detention basins. Supervised a team of up to six construction inspectors monitoring earthwork, concrete, reinforcing and structural steel, and asphalt pavement construction.

Rensselaer Cogeneration Plant; Rensselaer, New York. Project Manger responsible for the geotechnical evaluation of a site along the riverfront proposed for the construction of a coal-fired cogeneration plant. Evaluation included the assessment of strength and

compressibility characteristics of a deep deposit of glacio-lacustrine clay with a known history of landslide susceptibility. Thin-walled tube samples were recovered, tested in triaxial compression and the test results compared to similar data available through the NYSDOT. Specifications were developed to assure stability of the riverfront through establishing limits to the height of stockpiled coal, and setback lines for the stockpile and any ground supported structures.

Prospect Avenue Landslide Stabilization; Fort Plain, New York. Project Manger for the analysis and stabilization of a 70 foot high hillside. The landslide severed a sanitary sewer line along a road bordering its top and its base terminated along a river. Within these confines the design required the excavation of the landslide mass and reconstruction of the failed hillside utilizing at its base an over-steepened toe constructed of geotextile reinforced earth. Rip rap was used as cover to protect the geotextile from sunlight damage and for erosion protection along the river.

Paper Magic, Inc. Warehouse Expansion; Troy, Pennsylvania. Project Manager responsible for the evaluation and remedial design of a 200 foot long landslide induced by the construction of a printing distribution center. Developed and supervised test boring and monitoring well installations, and laboratory testing program that included triaxial shear tests. Field investigations disclosed the presence of artesian groundwater conditions within a winnowed till layer overlain by lacustrine silt and clay soils. Computer assisted slope stability studies were performed to evaluate several remedial options. A toe berm and relief well system was found to be the most cost effective method of stabilization and was constructed under the Project Manager's observation.

Cargill Shiploading Terminal; Albany, New York. Project Manager responsible for the design of a foundation for a new ship loader adjacent to the Hudson River at the Port of Albany, New York. The design included the evaluation of dock stability along a section of recorded lateral instability. Mechanisms of failure of the relieving platform style dock were evaluated and that responsible identified. A foundation design including a combination of H-piles and a deadman tie-back system was adopted to provide proper vertical support of the ship loader and ensure its long-term lateral stability.

CIBRO Petroleum Facility; Port of Albany, New York. Project Manager responsible for evaluating riverfront stability under the proposed construction of petroleum storage tanks along the Hudson River. Slope stability analyses included evaluating detailed soil stratigraphy and shear strength parameters, and pore pressure response to loading and its time-rate of dissipation. Final design recommendations included installation of pneumatic piezometers and staged hydrostatic testing of tanks to monitor and control effects of riverbank loading.

CIBRO Petroleum Refinery Expansion; Albany, New York. Project Engineer assigned to evaluate alternatives to an anchored sheetpile bulkhead (ARBED system). Evaluation included the selection and design of a cellular cofferdam. Follow-up construction inspection of each dock structure involved installation and monitoring of pore pressure upon backfilling bulkhead with lightweight aggregate, and review and approval of cofferdam fill materials and their method of placement.

Goodnow Flow Dam; Newcomb, New York. As this project's consulting hydraulic and geotechnical engineer, services provided on this project included hydrologic and hydraulic analyses, slope stability analyses of the dam's earthen embankment sections and structural

stability analyses of its new spillway. The structural stability analyses led to the need to anchor the dam with single-bar post-tensioned rock anchors. An Engineer's Report was prepared for the project to present these analyses in support of the applications for permit. Construction of the new spillway is planned for the Fall of 2009 at which time our services in administrating and monitoring construction has been requested.

Lake Vanare Dam; Lake Lazerne, New York. This aged concrete gravity dam was in need of repair due severe deterioration of its concrete surface. The extent of the concrete deterioration was investigated and plans and specifications developed to restore its concrete surface through cement grouting of its substrate, removal of deteriorated concrete and replacing it with concrete reinforced and doweled into the section of concrete left in place. In support of the permit applications prepared for this project, hydrologic and hydraulic (H&H) and structural stability analyses were performed. The H&H analyses indicated the need to raise the height of the dam to provide adequate freeboard during the spillway design flood of this Hazard Class B dam. Administrating and monitoring the construction contract on a full-time basis was provided.

Bocklet Pond Dam, Durham, New York. Within four years of the construction of this 38 foot high earthen dam, the dam failed releasing, in a matter of hours, the 11 acre body of water the dam retained. As the engineer retained to investigate the dam's failure and develop plans and specifications for its repair, the work performed included hydrologic and hydraulic analyses, slope stability evaluations, and the preparation of a new Joint Application for USACOE Nationwide and NYSDEC Freshwaters Wetlands and Protection of Waters Permit. Construction observation services were performed to complete the forensic evaluation of the dam's failure and monitor its reconstruction. Internal soil piping as a result of inadequate design of the dam's filter diaphragm and poor construction practices were determined to be the cause of the dam's failure and were reported as such to support mediation hearings.

Institution Reservoir Dam; Coxsackie, New York. Hydrologic, hydraulic, geotechnical and structural stability analyses were performed to evaluate the engineering aspects associated with raising the height of a concrete gravity dam to increase the water supply capacity of a reservoir serving a correctional facility. Work included investigation and installation of instrumentation and its monitoring to assess uplift pressures on the base of the dam, and the development of consolidation grouting and rock anchoring requirements to stabilize the dam under the increased hydrostatic head. Plans and specifications were prepared to include these features, restoration of the dam's deteriorated concrete surface, and the replacement of trash racks and gate valves. Existing wetlands were delineated and the wetlands to be created with the raising of the reservoir's water level evaluated. A Joint Application for USACOE Nationwide and NYSDEC Freshwaters Wetlands and Protection of Waters Permit was prepared.

Smith Bridge Road Dam; Town of Wilton New York. Hydrologic and hydraulic analyses were performed to assess the capacity of this dam's drop inlet spillway. The assessment was prompted by the sudden loss of ground above its outlet pipe and the concerns for the safety of the low hazard dam and the heavily traveled secondary road running along its crest. The results of this analysis lead to the development of plans and specifications for the spillway's replacement and the preparation of USACOE Nationwide and NYSDEC Freshwaters Wetlands and Protection of Waters permits for the work.

Water Supply Reservoir Dams; Glens Falls, New York. Phase 1 and, in some cases, Phase 2 Dam Safety Inspections were performed on the structures retaining five water supply reservoirs of the City of Glens Falls, New York. All but one of these structures are earthen dams with central core walls of masonry, concrete or sheetpile construction. One structure is a concrete gravity dam. For those dams whose Phase 1 Safety Inspections identified the need to establish the line of seepage through their embankments, couplet monitoring wells were installed.

Exhibit 2

Jackson Summit Reservoir Dam; Gloversville, New York. Five years from the time a spillway for this high hazard dam was constructed, approximately 30 gallons per minute of seepage was observed emanating from the embankment alongside the new spillway's outlet channel. Soil particles were being removed with this flow giving rise to concern for a piping failure of the dam's embankment and loss of the sole water supply of the City of Gloversville. Upon lowering the reservoir level and installing a Portadam, the problem was investigated through the advancement of test borings, in-situ permeability testing, ground penetrating radar surveys and controlled seepage tests. Correction of the problem involved injection of grout by tube-a-manchette methods to form a cutoff wall adjacent to and below the dam's ogee weir, epoxy grouting of cracks in the weir and its training walls, and the replacement of the undermined channel below the weir. Replacement of the channel included the installation of a 30 inch deep drainage blanket and underdrain piping to collect the natural seepage through the dam's embankment and direct it to at discharge point whereby it could be monitored on a log term basis. The remedial work was performed under two simultaneous contracts and expedited under an Emergency Authorization of the NYSDEC.

Crescent & Vischers Ferry Dams; Albany, Saratoga & Schenectady Counties, New York. As a subcontractor to Underwater Construction Corporation, an inspection of the upstream and downstream portions of these concrete gravity dams was made. The inspections were videotaped and a report submitted of the findings. Locations and lengths of crack within the upstream face of the structures were identified.

Mt. Hope Reservoir Dams; Oneida, New York. Developed plans and specifications for demolition of a concrete gravity dam and the rehabilitation of an earthen dam. Design included analysis of spillway capacity and slope stability of earthen dam. Prepared Joint Application for USACOE Nationwide and NYSDEC Freshwaters Wetlands and Protection of Waters Permit. Included with this application was the submittal of Supplement D-1.

Walden Pond Dam; Guilderland, New York. Developed subsurface investigation program, evaluated results, and designed a zoned earthen embankment dam. Features included central clay core and cutoff trench, chimney and blanket drains, and concrete drop inlet spillway and outlet conduit. Managed field inspection and testing of dam's construction.

Bradley and Wright Lake Dams; Troy, New York. Project Geotechnical Engineer responsible for evaluation of downstream slope repairs and spillway enlargements to both dams. Remedial measures included clearing of downstream slopes, construction of stabilizing berms at downstream toe of dams, and repair/extension of outlet works including channel erosion protection measures.

Professional Background

- Professional Engineer-New York
- M.S., Civil Engineering, Purdue University, 1975
  B.S., Civil Engineering, Clarkson University, 1973
- Professional Affiliations include: American Society of Civil Engineers, Deep Foundation Institute, and Association of State Dam Safety Officials, Inc.
- Past experience: Vice President, Empire Soils Investigations, Inc. (1991-1995), Manager-Geotechnical Services, Empire Soils Investigations, Inc. (1987-1991), Sr. Geotechnical Engineer, Empire Soils Investigations, Inc. (1980-1987), Geotechnical Engineer, Empire Soils Investigations, Inc. (1977-1980), Geotechnical Engineer, GAI Consultants, Inc. (1975-1977)

C.T. MALE ASSOCIATES, P.C.

MEMORANDUM

DATE: October 20, 2009

TO: Kevin Bernstein

FROM: Rick Wakeman

RE: *Planning Board Presentation Summary*
Brine Pond

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On October 15, 2009, I was present at the Planning Board Meeting to address comments raised regarding the stability of the Brine Pond proposed for construction to the immediate east of NYS Routes 14 and 14A in the Town of Reading, New York. In responding to these comments, the following was presented to members of the Planning Board and the public.

1.) Six (6) test borings were advanced at the site proposed for the pond's construction. These borings revealed the presence of 20 to 33 feet of overburden, the majority of which was composed of very dense glacial till (commonly referred to as "hardpan").

2.) With the pond site being sloping, construction of the pond required a 30 foot cut on the uphill side of the pond closest to NYS Route 14A and the construction of an earthen berm of near equal height on its downhill side. The grading plan for the pond was presented on a board for viewing.

3.) Two issues of concern in this design were the stability of the berm constructed on the downhill side of the pond and the need to dispose of excess cut material on-site to avoid heavy construction traffic on neighboring roadways. Slopes on the interior of the pond were flattened to one (1) vertical on three (3) horizontal to lessen the volume of cut and avoid rock excavation on the uphill side of the pond, and increase the volume of fill required to construct the earthen embankment on the downhill side of the pond. Furthermore to enhance the stability of the earthen berm on the downhill side of the embankment, its side slopes were flattened to one (1) vertical on four (4) horizontal and a 50 foot wide bench added at mid height of the embankment. A section of the embankment on the downhill side of the pond was shown on a board. This section illustrated the brine being stored at its maximum depth of 30 feet and the soil profile beneath the earthen embankment. The design shown on the grading plan and illustrated on the section was found to result in a balance between cut and fill. Accordingly, all earthwork would be confined to the site.

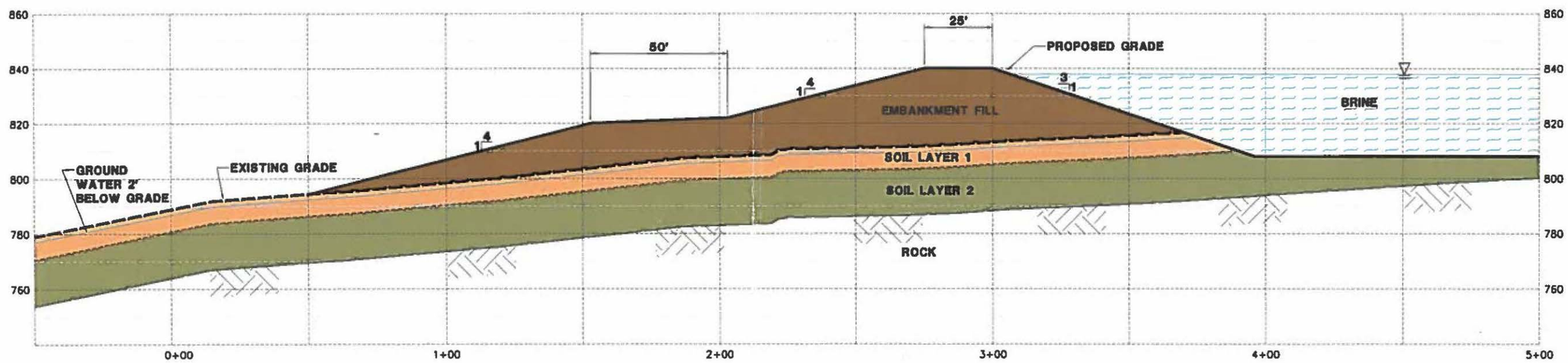
4.) The stability of the downstream embankment was analyzed using conservation soil strength parameters and an earthquake peak ground acceleration for the site obtained from the USGS web site. The factor of safety against the embankment's failure under this seismic event was analyzed for 100 potential sliding surfaces and found to have a value of at least 2.13. This safety factor was well in excess of the safety factors normally applied in geotechnical practice for slope stability, these being 1.25 to 1.50.

5.) The stability of the downstream embankment was also analyzed for an earthquake peak ground acceleration **50% greater than** the acceleration obtained from the USGS web site. Under this acceleration, the factor of safety against a slope failure was found to equal 1.86, a value also well in excess of those normally applied in geotechnical practice.

6.) When asked if the embankment would fail, I stated that it would not fail with the design shown on the boards.

BRINE POND SECTION PLAN
SHEET 1 OF 2

Town of Reading
Schuyler County, New York



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LAND PLANNING • ENVIRONMENTAL SERVICES • GPS/GIS SERVICES
OCTOBER 15, 2009 PROJ. NO: 08 8696
BRINE PND SECTION PLAN.DWG

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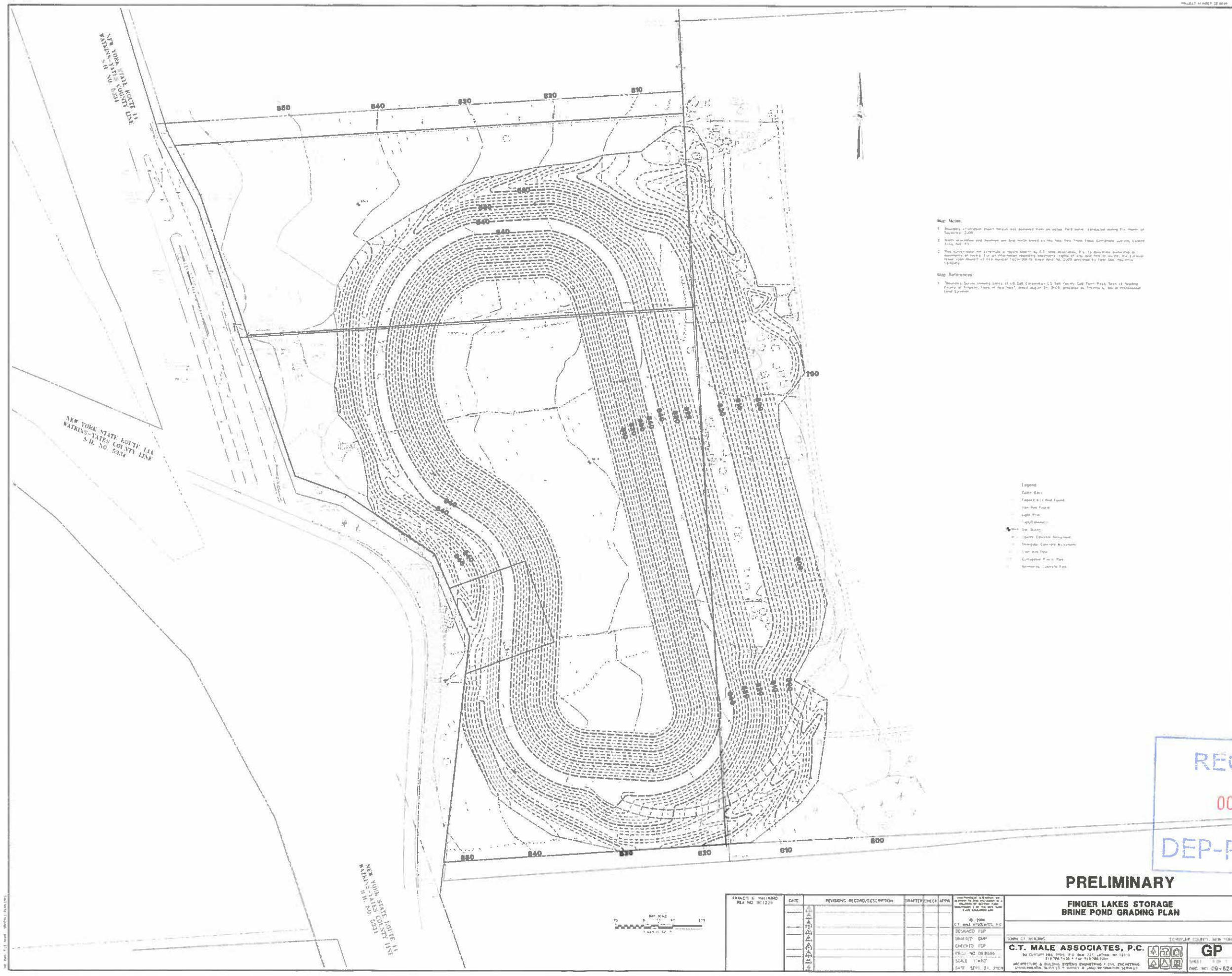

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