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Syracuse, NY 13212  
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July 28, 2011

Mr. Richard Mustico, P.E.  
Project Manager  
Division of Environmental Remediation  
New York State Department of Environmental Conservation  
Remedial Bureau D  
625 Broadway – 12<sup>th</sup> Floor  
Albany, New York 12233-7016

**SUBJECT: LCP Bridge Street OU2 Site (Site # 7-34-049)  
Village of Solvay, Onondaga County, NY  
Order on Consent: Index # D7-0001-01-03  
NAKOH Proposed Soil Removal Work Plan  
July 2011**

Dear Mr. Mustico:

Enclosed please find one hard copy and one electronic copy of the LCP Bridge Street OU-2 Site NAKOH Proposed Removal Work Plan, dated July 2011

Please contact me or Tom Drachenberg at (315) 552-9688 if you have any questions.

Sincerely,

*Alfred J. Labuz*  
Alfred J. Labuz  
Remediation Manager

SAW

*I, Thomas Drachenberg, certify that I am currently a NYS registered professional engineer and that this Remedial Action Work Plan was prepared in accordance with all applicable statutes and regulations and in substantial conformance with the DER Technical Guidance for Site Investigation and Remediation (DER-10).*

*Thomas Drachenberg*  
Thomas C. Drachenberg, P.E.  
NY State Engineering License No. 086020



Mr. Richard Mustico, P.E.  
NYSDEC  
July 28, 2010  
Page 2

Attachments

cc: Margaret Sheen, Esq., NYSDEC (Cover Ltr Only)  
Harry Warner, NYSDEC (1 bound, 1 PDF)  
Diane Carlton, NYSDEC (1 PDF & Orig.)  
Steve Bates, NYSDOH, (1 bound, 1 PDF)  
Geoff Laccetti, NYSDOH, (Cover Ltr Only.)  
Joseph Heath, Esq., (ec Cover Ltr Only)  
Thane Joyal, Onondaga Nation (1 PDF)  
Heidi Kuhl, Onondaga Nation (1 bound copy)  
Jeanne Shenandoah, Onondaga Nation (1 bound copy plus ec Cover Ltr Only)  
Curtis Waterman, Onondaga Nation (ec Cover Ltr Only)  
Alma Lowry, Onondaga Nation (ec Cover Ltr Only)  
Fred Kirschner, AESE, Inc. (1 PDF)  
Brian Israel, Esq., Arnold and Porter (1 PDF)  
Tom Drachenberg, Parsons (1 bound)

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## LCP BRIDGE STREET OU-2 SITE NAKOH PROPOSED SOIL REMOVAL WORK PLAN JULY 2011

Pursuant to the Order on Consent for the LCP OU-2 site, Honeywell is proposing removal actions to address mercury-impacted soils located on the NAKOH site (Figure 1), adjacent to the LCP OU-2 site. The schedule for implementation of the NAKOH portion of the remedy has been advanced with the goal of coinciding with remedial actions planned for 2011 associated with LCP OU-1 and Geddes Brook. As described in the *Remedial Design Work Plan* (Parsons, 2011), components of the remedy included in the Order on Consent to address impacted soil and groundwater at the LCP OU-2 site will be addressed as a separate design submittal.

### NAKOH SOIL REMOVAL

This section describes the scope of work for the excavation and handling of mercury-impacted soil from the NAKOH site. Site work will be completed in accordance with the NYSDEC-approved Construction Health and Safety Plan (HASP), Construction Quality Assurance and Procedure Plan (QAPP), and Construction Sampling and Analysis Plan (CSAP) (Parsons, 2004). In addition, air monitoring will be conducted during soil removal activities in accordance with the NYSDOH generic community air monitoring plan. Monitoring will consist of an upwind and downwind station, which will monitor the air for volatile organic compounds (5 ppm site limit), dust/particulate (150 mcg/m<sup>3</sup> sustained limit), and mercury (0.045 mg/m<sup>3</sup> site limit). If these air monitoring criteria are exceeded site activities will be curtailed, and dust or volatile organic compound suppression measures will be taken until conditions improve.

### Site Preparation

Prior to beginning work at the site, Dig Safely New York and GPR will be used to mark existing site utilities. A licensed surveyor will survey the site before and after the work. It is anticipated that temporary facilities, such as trailers, utilities, decontamination pad(s), and staging areas installed for Geddes Brook and the LCP OU-1 removals will be utilized for the NAKOH removals.

The ground surface on the NAKOH property is covered in weathered asphalt pavement / gravel material. This material will be excavated along with impacted soils, and brought to LCP OU-1 for consolidation within the LCP OU-1 landfill.

### Excavation & Backfill

Soil will be excavated from two separate areas corresponding to remedial investigation (RI) sample points PGP-25 and PGP-28, encompassing a total of approximately 14,700 square ft. (~0.3 acres). The results of RI sampling on soil samples collected from NAKOH are presented in Attachment A. Based on these results which exceeded the commercial criteria for mercury

(2.8 ppm), excavation depths for locations PGP-25 and PGP-28 are estimated to be 3-ft. and 5 ft. respectively. The two soil removal areas both abut the NAKOH building. Soils adjacent to the NAKOH building will be removed up to the building and footer (if encountered). Removal required below the bottom of the footer will be sloped on a 2:1 (horizontal to vertical) away from the footer until the required depth noted above is achieved. Remaining limits of excavation will be sloped at a 2:1 to existing grade. Excavation areas and details are shown on Drawings 445819 C-001 and C-002 in Attachment B. An estimated total of 2,000 cubic yards of material will be excavated from the NAKOH site and brought to the LCP OU-1 consolidation area. The material will be transported using trucks which will exit the NAKOH site through an existing gate on the northern part of the site to the LCP OU-2 site and use the existing bridge over the West Flume to reach the LCP OU-1 consolidation area.

As material is excavated, accumulated surface/groundwater, if any, will be pumped from the excavation into a temporary storage tank(s) and treated at the construction water treatment plant being constructed to support the Geddes Brook project.

Following excavation, confirmatory samples will be collected and analyzed for total mercury by USEPA SW 846 Method 7471A. Samples will be taken on a 50-ft. grid. One sample will be collected at each grid point. Excavation sidewall samples will be collected on 100-ft. intervals. As additional excavation beneath building footers may undermine the building foundation, only post construction samples will be collected on the side-walls adjacent to the NAKOH building. Using the confirmatory sample results, a field decision will be made by Honeywell and NYSDEC on the need for additional excavation. Upon determination by Honeywell and NYSDEC that excavation is complete; the NAKOH removal areas will be backfilled and compacted using conventional construction equipment. Following backfill, 6 inches of coarse gravel will be placed, and the areas will be paved with 4 inches of asphalt. Restoration details are provided on Drawing C-002.

## **SCHEDULE**

As described above, this work plan has been submitted in advance of the LCP OU-2 design submittals, to allow the work to coincide with planned removal efforts associated with LCP OU-1 and Geddes Brook. The NAKOH removal is anticipated to be completed in the summer/fall of 2011. This removal schedule is contingent on access to the removal areas on the NAKOH property, which are currently overlaid with large quantities of scrap metal and debris. To provide the construction team with the flexibility to coordinate the removal efforts when schedules and progress permit, a specific schedule of completion has not been established. It is proposed that Honeywell inform NYSDEC two weeks prior to the intent to initiate excavation activities at NAKOH.

**ATTACHMENT A**  
**EXISTING NAKOH SOIL SAMPLE DATA**

	Mercury Concentrations (mg/Kg) at NAKOH Sample Points							
	0-.5 ft	1 ft - 3 ft	3 ft- 5 ft	5 ft - 8 ft	8 ft - 10 ft	10 ft- 12 ft	18 ft-20 ft	28 ft-30 ft
PGP-25	1.9	5.7				0.01	0.007	
PGP-26	2.2		0.04			0.01	0.008	
PGP-27	0.25				0.03	0.03		
PGP-28	4.2		7.7			0.1	0.02	
PSB-6				0.11		0.01		
PSB-7	1.7			0.03		0.01		

**ATTACHMENT B**  
**DRAWINGS**



LCP  
OU-2

LCP  
OU-1

NAKOH BUILDING

Now or Formerly  
Property of  
Hanlin Group, Inc.  
Tax Parcel No. 27-3-10.1  
Liber 3594 - Page 49

Now or Formerly  
Property of  
Nicholas N. Vitto  
Tax Parcel No. 27-3-10.5  
Liber 4833 - Page 141

Now or Formerly  
Property of  
Matlow Company, Inc.  
Tax Parcel No. 27-4-1.1  
Liber 4045 - Page 45

Now or Formerly  
Property of  
Arthur Susco  
Tax Parcel No. 27-4-2.1  
Liber 4810 - Page 035

- LEGEND:**
- NMW-1S MONITORING WELL LOCATION
  - PSB-5 SOIL BORING LOCATION
  - PGP-25 GEOPROBE SAMPLE LOCATION
  - EXISTING CHAIN LINK FENCE
  - RAILROAD
  - SOIL REMOVAL AREAS

- NOTES:**
1. MONITORING WELL NMW-3S TO BE ABANDONED IN PLACE.
  2. MONITORING WELLS NMW-2S AND NMW-2D TO BE LEFT IN PLACE.

IT IS A VIOLATION OF LAW FOR ANY PERSON, UNLESS HE IS ACTING UNDER THE DIRECTION OF A LICENSED PROFESSIONAL ENGINEER OR LAND SURVEYOR, TO ALTER AN ITEM IN ANY WAY. IF AN ITEM BEARING THE SEAL OF AN ENGINEER OR LAND SURVEYOR IS ALTERED, THE ALTERING ENGINEER OR LAND SURVEYOR SHALL AFFIX TO THE ITEM HIS SEAL AND THE NOTATION "ALTERED BY" FOLLOWED BY HIS SIGNATURE AND THE DATE OF SUCH ALTERATION, AND A SPECIFIC DESCRIPTION OF THE ALTERATION.

0	ISSUED FOR CONSTRUCTION	7/27/11	JR	ERW	TCD
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NO.	DESCRIPTION	DATE	DRAWN	CHK'D	APP'D
DRAWN BY	JR	DATE	6/2/11	SEAL	
CHECKED BY	ERW	DATE	6/2/11		
APPROVED BY	TCD	DATE	6/2/11		
PROJECT MGR.	TCD	DATE	6/2/11		



**PARSONS**  
COMMERCIAL TECHNOLOGY GROUP

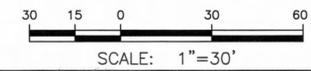
OFFICE: 301 PLAINFIELD ROAD SYRACUSE, NY 13212 (315) 451-9560  
JOB: 445819  
WBS: 04200

PROJECT TITLE: LCP OU-2  
REMEDIAL DESIGN  
NAKOH PROPERTY SOIL REMOVAL  
SYRACUSE, NEW YORK

DRAWING TITLE: EXCAVATION LIMITS

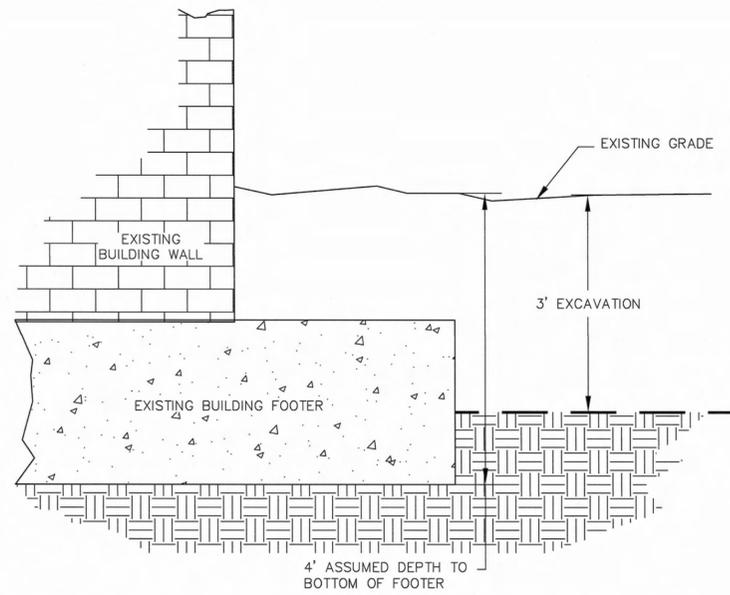
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(IF PRINTED ON 22x34" SHEET)

DRAWING NO. 445819-C-001 REV. 0



SCALE: 1"=30'

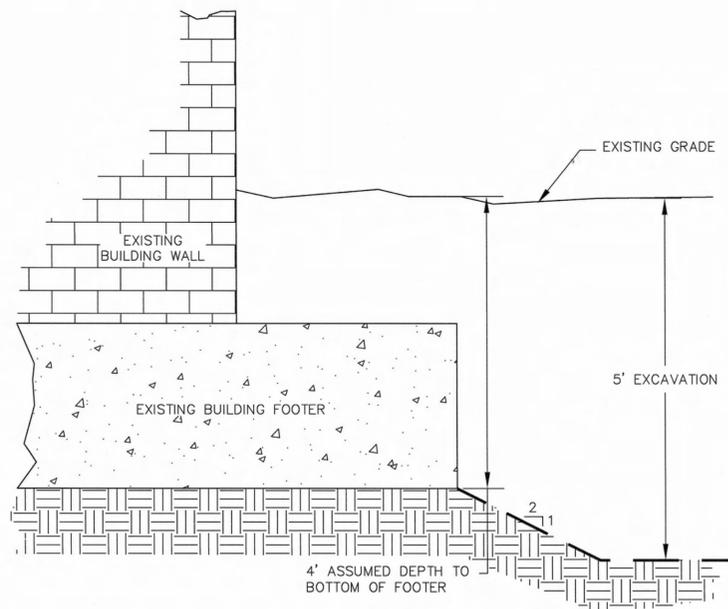
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**A EXCAVATION DETAIL—LOCATION PGP-25**  
C-001/NOT TO SCALE

**NOTES:**

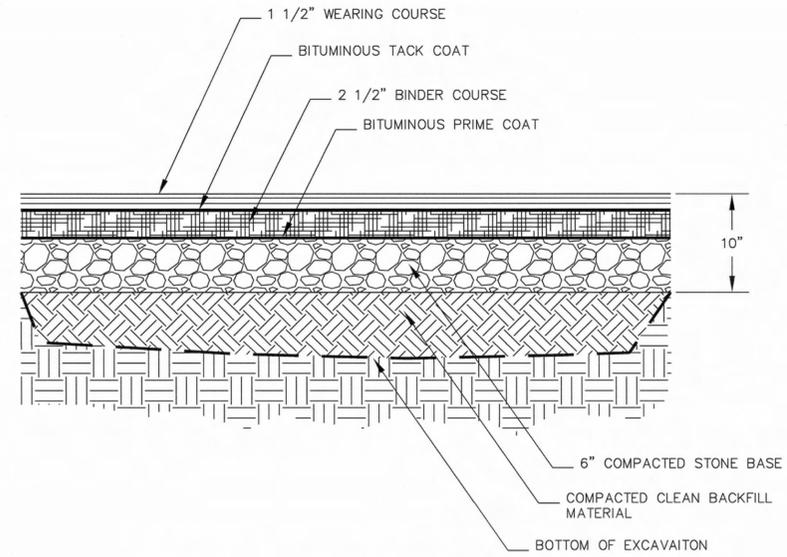
1. IF CONFIRMATORY SAMPLING REQUIRES DEEPER EXCAVATION, 2:1 SIDE SLOPE WILL BE MAINTAINED FROM BOTTOM OF BUILDING FOOTER UNTIL REQUIRED DEPTH IS ACHIEVED.
2. MAXIMUM OSHA ALLOWABLE SLOPE IS 1:5 TO 1 FOR EXCAVATIONS LESS THEN 20'.



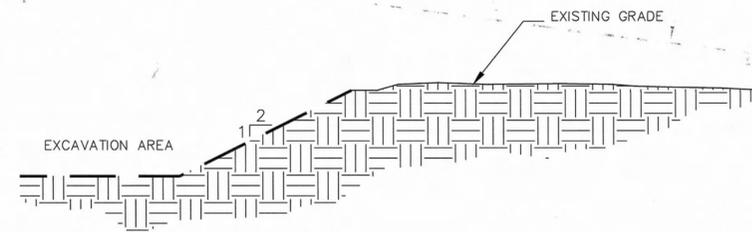
**B EXCAVATION DETAIL—LOCATION PGP-28**  
C-001/NOT TO SCALE

**NOTES:**

1. IF CONFIRMATORY SAMPLING REQUIRES DEEPER EXCAVATION, 2:1 SIDE SLOPE WILL BE MAINTAINED FROM BOTTOM OF BUILDING FOOTER UNTIL REQUIRED DEPTH IS ACHIEVED.
2. MAXIMUM OSHA ALLOWABLE SLOPE IS 1:5 TO 1 FOR EXCAVATIONS LESS THEN 20'.



**ASPHALT PAVING DETAIL (TYP)**  
NOT TO SCALE



**EXCAVATION LIMIT DETAIL (TYP)**  
NOT TO SCALE

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NO.	DESCRIPTION	DATE	DRAWN	CHK'D	APP'VD
0	ISSUED FOR CONSTRUCTION	7/27/11	JR	ERW	TCD

DRAWN BY	DATE	SEAL
JR	6/2/11	
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ERW	6/2/11	
APPROVED BY	DATE	
TCD	6/2/11	
PROJECT MGR.	DATE	
TCD	6/2/11	

**PARSONS**  
COMMERCIAL TECHNOLOGY GROUP

OFFICE: 301 PLAINFIELD ROAD  
SYRACUSE, NY 13212  
(315) 451-9560

JOB: 445819  
WBS: 04200

PROJECT TITLE: **LCP OU-2  
REMEDIAL DESIGN**

NAKOH PROPERTY SOIL REMOVAL  
SYRACUSE, NEW YORK

DRAWING TITLE: **DETAILS**

SCALE: NOT TO SCALE  
(IF PRINTED ON 22x34 SHEET)

DRAWING NO.: **445819-C-002**

REV: **0**