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May 12, 2011

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

**RE: LCP Bridge Street OU1 Site (Site # 7-34-049), Village of Solvay, Onondaga County, NY
Order on Consent: Index # D7-0001-00-12
LCP OU1 Proposed Soil Removal – West Ditch, Wetland A and Dredge Spoils Areas**

Dear Mr. Mustico:

Based on Operation Maintenance & Monitoring (OM&M) sampling, elevated mercury concentrations were detected and delineated in site soils and sediments along the West Ditch, Wetland A and in the Dredge Spoils area (Figure 1). This letter provides the details of the proposed removal activities to address these areas. NYSDEC comments dated 3/23/11 have been addressed and are reflected in this letter.

All work shall be conducted in accordance with the Construction Health and Safety Plan (CHASP), Construction Quality Assurance Project Plan (CQAPP), and the Construction Sampling and Analysis Plan (CSAP) (Parsons, 2004). Erosion control features will be installed and maintained in accordance with the Geddes Brook IRM Storm Water Pollution Prevention Plan (SWPPP). Temporary facilities, such as trailers and utilities, will be installed to support the construction activities as required.

West Ditch

Site Preparation

Vegetation located in the proposed removal areas (grasses, small shrubs) will be handled with the excavated soil. A portion of the site security fence will be removed to facilitate soil removal; temporary fencing will be installed as appropriate to maintain site security.

Soil/Sediment Removal

The proposed removal along the West Ditch is divided into two areas. West Ditch Area 1, as indicated on Drawing C-002, extends from the west end of the HDPE culverts installed near the groundwater extraction system building to Wetland A. The proposed depth of excavation in this

area is 2 feet or to underlying clay with an estimated 2,276 cubic yards of material excavated and placed in the soil/sediment containment area. Following excavation, post-excitation samples will be collected in accordance with the CSAP and CQAPP. Based on the sample results, a decision will be made by Honeywell and the NYSDEC on the necessity of additional excavation. After excavation and post-excitation sampling are complete, the area will be restored to maintain positive drainage with bank run gravel, 6 inches of topsoil and seeded with the conservation seed mix specified in Table 1.

West Ditch Area 2, as indicated on Drawing C-002, extends from the eastern end of the HDPE culverts installed near the groundwater extraction system building past sample location LCP1-SED-103. The proposed depth of excavation in this area is 1 foot or to underlying clay with an estimated 386 cubic yards of material excavated and placed in the soil/sediment containment area. Following excavation, post excavation samples will be collected as indicated above for Area 1. After excavation and confirmatory sampling are complete, the area will be graded to maintain positive drainage and restored with six inches of topsoil and the Conservation Seed Mix specified in Table 1.

Wetland A

Site Preparation

Vegetation located in the proposed removal areas (grasses, small shrubs) will be handled with the excavated soil/sediment.

Soil/Sediment Removal

The proposed removal in and around the Wetland A basin is divided into two areas. Wetland A Area 1, as indicated on drawing C-003, is located immediately west of the former MW-26 excavation area between Wetlands A & B. The proposed depth of excavation in this area is 1 foot to address the residual contamination indentified in sample LCP1-SS-107. The estimated volume to be excavated and placed in the soil/sediment containment area is 326 cubic yards.

Following excavation, post-excitation samples will be collected in accordance with the CSAP and CQAPP indicated above. Based on the sample results, Honeywell and NYSDEC will decide on the necessity of additional excavation. After completion of excavation and post-excitation sampling, the area will be restored with 6 inches of topsoil and seeded with the conservation seed mix specified in Table 1.

Wetland A Area 2, as indicated on Drawing C-003, extends from the West Ditch discharge location into the Wetland A basin through sample location LCP1-SED-97. The proposed depth of excavation in this area is 1 foot with an estimated 377 yards of material excavated and placed in the soil/sediment containment area. Following excavation, post excavation samples will be collected as indicated above for Wetland A Area 1. The area will be restored with 6 inches of topsoil and seeded with the Wet Meadow seed mix specified in Table 2.

Dredge Spoils Area

Site Preparation

Prior to removals, a wetland delineation will be performed within the Dredge Spoils Area. This delineation will be conducted in accordance with the New York State Department of Environmental Conservation (NYSDEC)-approved Revised Final Work Plan, Wetlands/ Floodplain Assessment, Onondaga Lake (O'Brien and Gere/Parsons, 2004b). Field activities and reporting will focus on wetland delineation, assessment of values and functions, and characterization of flora and fauna, as well as floodplain delineation.

The vegetation located in the proposed removal areas includes grasses, small shrubs and trees. The grasses and small shrubs will be handled with the soils. The trees will be chipped up and managed in the soil/sediment containment area.

Removal

The proposed removal in the Dredge Spoils Area, as indicated on Drawing C-004, is divided into three areas. The depth of excavation for Dredge Spoils Area 1, located at the western end of the remedial area is 3 feet with an estimated 1,810 cubic yards of material excavated and placed in the soil/sediment containment area. Following excavation, post-excavation samples will be collected in accordance with the CSAP and CQAPP indicated above. Following excavation the area will be restored with a minimum of 6 inches of topsoil and the conservation seed mix specified in Table 1.

Dredge Spoils Area 2, as indicated on Drawing C-004, extends from Area 1 to the steam line crossing and associated access road. The proposed depth of excavation is to the underlying clay layer, with an average removal depth of 2 feet. The estimated volume of material to be excavated and placed in the soil/sediment containment area from Area 2 is 9,500 cubic yards. Following excavation, post-excavation samples will be collected in accordance with the CSAP and CQAPP indicated above. Following excavation, the area will be restored with 6 inches of topsoil and the conservation seed mix specified in Table 1.

Dredge Spoils Area 3, as indicated on construction drawing C-004, is a small drainage channel running in front of the wooded area to the east of the steam line. The proposed depth of excavation is to the underlying clay layer, with an average cut of 2 feet. The estimated volume of material to be excavated and placed in the soil/sediment containment area from Area 3 is 954 cubic yards. Following excavation, post-excavation samples will be collected in accordance with the CSAP and CQAPP indicated above. Following excavation the small channel will be restored with 6 inches of topsoil and the wet meadow seed mix specified in Table 2.

Restoration

Restoration of disturbed areas is shown on Figure C-005 through C-007. Topsoil will meet Specification 02990 and wetland plantings will be completed per Specification 02910 of the Final (100%) Design Report for the LCP Bridge St. OU-1 Site (Parsons, 2004a). The restoration seed mix presented in Tables 1 and 2 will supersede the seed mix(s) specified in the 100% design. Figure C-008 depicts a typical cross section and restoration for the West Ditch Area and Dredge Spoils Area. A 5 year invasive species control plan as specified for Wetlands A and B will also be conducted at all three excavation areas.

Soil/Sediment Containment Area Management

The estimated total volume of material to be brought to the soil/sediment containment area from the West Ditch, Wetland A, and Dredge Spoils areas is 15,629 cubic yards. A temporary stockpile area will be designated within the soil/sediment containment area based on the anticipated placement schedule of the Geddes Brook sediments. The temporary stockpile area will be managed in accordance with the Geddes Brook IRM SWPPP.

Schedule

The anticipated schedule for the completion of the work identified above is provided as Attachment C.

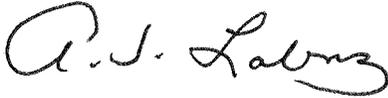
References

- Parsons, 2004b. Final (100%) Design Report for the LCP Bridge Street Site (OU-1). March 2004. Revised September 2004.
- O'Brien and Gere/Parsons, 2004a. Revised Final Work Plan Wetlands/Floodplain Assessment, Onondaga Lake. September 3, 2004.

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Please contact me or Mike Broschart (315) 552-9678 if you have any questions or require additional information.

Sincerely,



Alfred J. Labuz
Remediation Manager

Attachments

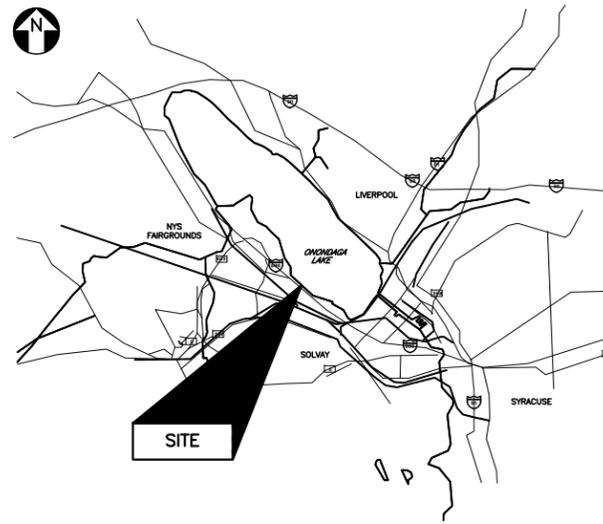
cc: Argie Cirillo, Esq., USEPA (Cover Ltr Only)
Mark Granger, USEPA (4 hard copies)
Geoffrey Laccetti, NYSDOH (Cover Ltr Only)
Mark Sergott, NYSDOH (1 hard copy, 1 PDF)
Harry Warner, NYSDEC (1 hard copy)
Margaret Sheen, Esq., NYSDEC (Cover Ltr Only)
Joseph Heath, Esq.(ec Cover Ltr Only)
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Curtis Waterman, Onondaga Nation (ec Cover Ltr Only)
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Brian Israel, Arnold & Porter (1 PDF)
Bill Hague, Honeywell (1 PDF)
Steve Miller, Parsons (1 PDF)
Michael Broschart, Parsons (1 hard copy)
Chris Calkins, OBG (1 hard copy)
Brian White, OBG (1 hard copy)

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Attachment A

Figures/Drawings

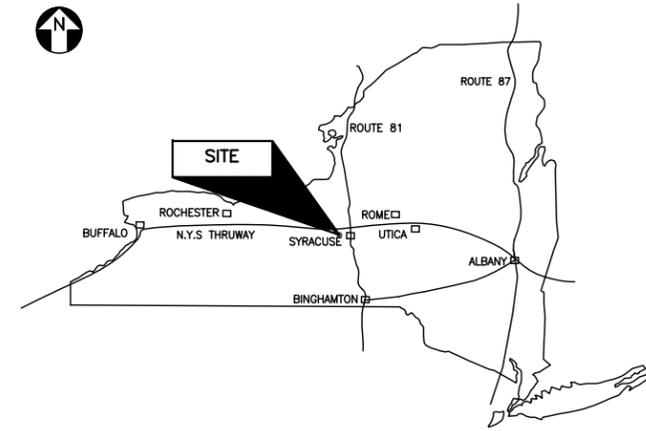
LCP (FORMER LINDEN CHEMICAL PLANT) OM&M REMOVALS



SITE LOCATION MAP
NOT TO SCALE

DRAWING INDEX

G-001	TITLE SHEET AND DRAWING INDEX
C-001	EXISTING SITE PLAN
C-002	WEST DITCH SAMPLE RESULTS/EXCAVATION PLAN
C-003	WETLAND A SAMPLE RESULTS/EXCAVATION PLAN
C-004	DREDGE SPOILS AREA SAMPLE RESULTS/EXCAVATION PLAN
C-005	WEST DITCH AREA RESTORATION PLAN
C-006	WETLAND A AREA RESTORATION PLAN
C-007	DREDGE SPOILS AREA RESTORATION PLAN
C-008	EXCAVATION AND RESTORATION DETAILS



THE STATE OF NEW YORK
NOT TO SCALE

PRELIMINARY DRAFT
SETTLEMENT CONFIDENTIAL
NOT INTENDED FOR PUBLIC REVIEW

NO.	DESCRIPTION	DATE	DRAWN	CHK'D	APP'VD
A ISSUED FOR COMMENT (IN PROGRESS)					

DRAWN BY	DATE	SEAL
JR	4/27/11	
CHECKED BY	DATE	
APPROVED BY	DATE	
PROJECT MGR.	DATE	

PARSONS
COMMERCIAL TECHNOLOGY GROUP

OFFICE: 301 PLAINFIELD ROAD, SYRACUSE, NY 13212, (315) 451-9560
JOB: 446662
WBS: 05172

PROJECT TITLE
LCP OM&M REMOVALS 2011

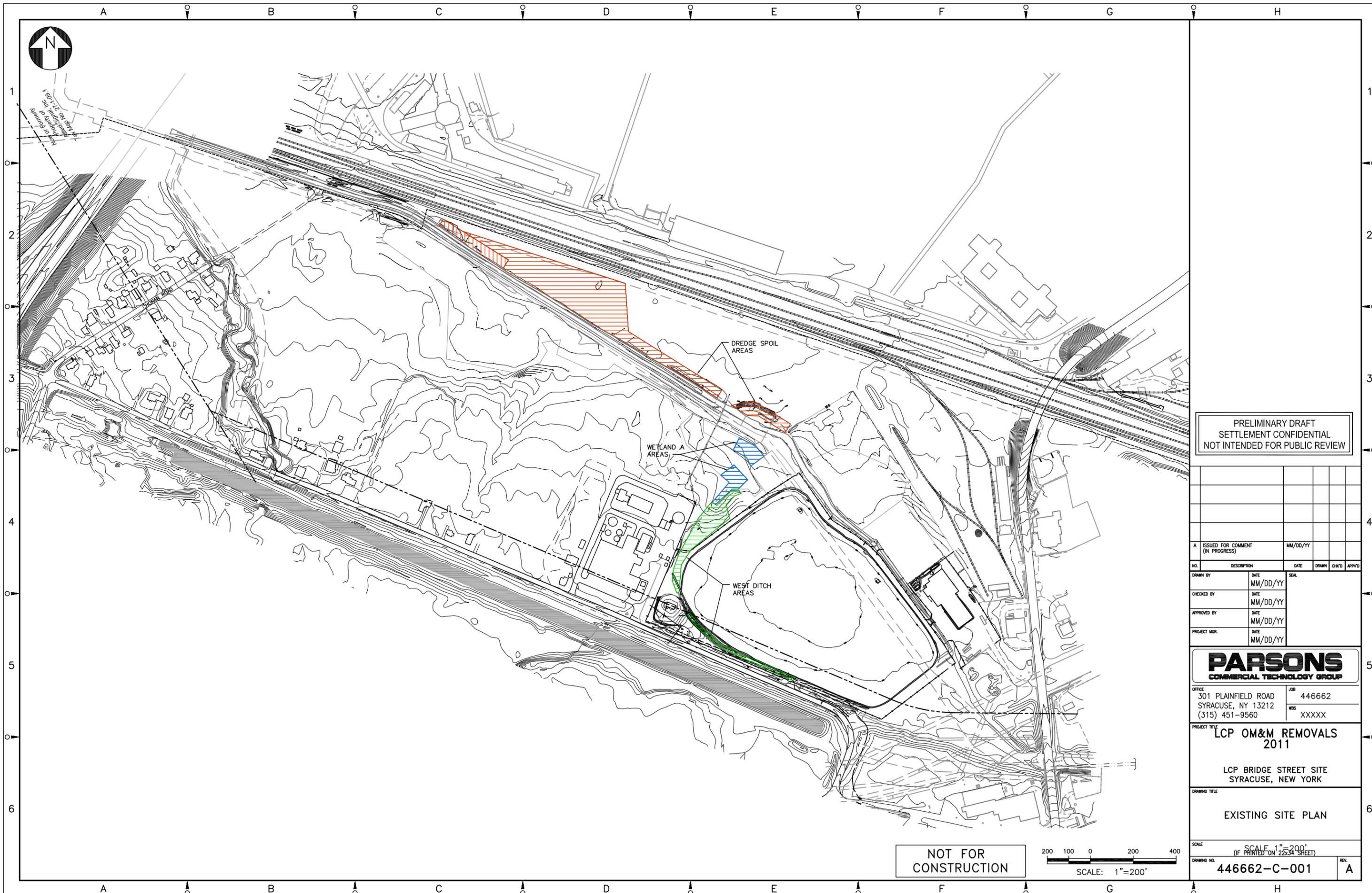
LCP BRIDGE STREET SITE
SYRACUSE, NEW YORK

DRAWING TITLE
TITLE SHEET AND DRAWING INDEX

SCALE: NO SCALE (IF PRINTED ON 22x34 SHEET)

DRAWING NO. **446662-G-001** REV. **A**

NOT FOR CONSTRUCTION



PRELIMINARY DRAFT
SETTLEMENT CONFIDENTIAL
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NO.	DESCRIPTION	DATE	DRAWN	CHK'D	APP'VD
A	ISSUED FOR COMMENT (IN PROGRESS)	MM/DD/YY			

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PROJECT MGR.	DATE	



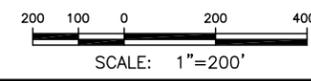
OFFICE	301 PLAINFIELD ROAD SYRACUSE, NY 13212 (315) 451-9560	JOB	446662
WBS			XXXXX

PROJECT TITLE
**LCP OM&M REMOVALS
2011**

LCP BRIDGE STREET SITE
SYRACUSE, NEW YORK

DRAWING TITLE
EXISTING SITE PLAN

NOT FOR
CONSTRUCTION



SCALE: 1"=200'
(IF PRINTED ON 22x34 SHEET)

DRAWING NO. **446662-C-001** REV. **A**

