File Copy

NYSEG

October 9, 2002

Mr. Gardiner W. Cross
Engineering Geologist 2
Division of Hazardous Waste Remediation
New York State Department of
Environmental Conservation
625 Broadway
Albany, NY 12233

Subject: Oneonta Former Manufactured Gas Plant (MGP) Site
Supplemental Remedial Investigation (SRI) Work Plan

Dear Mr. Cross:

NYSEG has reviewed your comment letter of October 2, 2002 regarding the above-referenced Work Plan. Based on NYSEG's review and our October 1, 2002 conference call where we discussed your preliminary comments, the following reply is offered to directly address comments as enumerated in your letter:

1. **NAPL Monitoring:** NYSEG will complete any of the "perimeter borings" (SB-106 and SB-112 through SB-119) which encounter non-aqueous phase liquids (NAPL) to NAPL-monitoring wells per the construction specifications recommended by DEC. The presence of NAPL will be determined per the criteria specified in Section 2 of the Work Plan (DNAPL Contingency Plan, p. 2-1). NAPL which enters the well will be removed and the volume will be recorded. The well will be monitored for re-accumulation of NAPL over a time interval that will be determined on a case by case basis.

2. **Treatability Testing:** The laboratory bench testing will include more than one oxidant. After background research is complete, a second oxidant will be recommended to DEC. As originally noted in the Work Plan, two soil samples will be tested, i.e., one from an unimpacted area to determine background oxidant demand, and one impacted sample.

   NYSEG agrees that it may be appropriate to field test some form of in-situ treatment as part of a site Feasibility Study or Remedial Design. NYSEG also agrees that it may be useful to gather baseline groundwater quality data prior to a field-scale pilot test. The problem is that determining the type and location of a pilot test would be best accomplished once the data from the forthcoming SRI are gathered and evaluated. However, NYSEG agrees that a location near MW-9111S may be a reasonable place to conduct such a test, based on what is known about the site to date. Therefore, NYSEG will agree to install two monitoring wells at the locations shown in the sketch that accompanied your above-referenced letter. The purpose of these wells will be to 1) gather baseline groundwater quality data; and 2) potentially serve as performance monitoring wells for a future pilot test for a yet undetermined in situ treatment technology.

As you know, properly evaluating the feasibility of any bioremediation technology requires evaluating key parameters regarding the indigenous microbiological community beneath the site. The SRI Work Plan addresses this by sampling ten wells (including MW-9111S) for indicator parameters including alkalinity, ammonia, methane, sulfate, sulfide, total iron and manganese, dissolved iron and manganese, orthophosphate and nitrate. Similarly, NYSEG will collect and analyze one round of samples from the two newly proposed wells for these indicator parameters, as well as BTEX and PAHs.

NYSEG, in consultation with BBL, believes that designing and installing a remedial well is not appropriate until a specific in situ treatment method is identified. Attempting to install a "multi-use" remedial well would most probably not yield an optimal design for all potential in situ treatment technologies. A remedial well designed for air sparging would likely not be appropriate for ozone injection and/or liquid reagent injection. Similarly, remedial wells designed for ozone injection would likely not be appropriate for air sparging and/or liquid reagent injection. Wells designed for liquid reagent injection most certainly would not be appropriate for air sparging or ozone injection. For these reasons, NYSEG proposes to evaluate the SRI data in order to recommend a specific in situ technology prior to committing to the installation of a pilot test remedial well. It should also be noted that the findings of the SRI may show that in-situ testing is unnecessary or inappropriate, or may identify a better location for conducting a future pilot test.

3. **Stream Sediments:** Stream sediment samples will be analyzed for BTEX compounds as well as PAHs. Three samples will also be analyzed for cyanide. The specific locations for the samples that will include cyanide analysis will be determined in the field, in consultation with the on-site DEC representative.

4. **DNAPL Contingency Plan:** The Plan will be revised to indicate that all of the borings will go at least as deep as the expected depth of the first confining unit. If that depth is exceeded and the confining unit is not encountered, the boring may be terminated.

Pending your approval of this reply, NYSEG will instruct BBL to make appropriate revisions to the Work Plan and send the revised copies (please advise whether redlined copies are required) to you. Please contact me by phone at (607) 762-8787 or by e-mail at jjruspantini@nyseg.com to discuss your thoughts at your earliest convenience, so that field work may commence as quickly as possible.

Sincerely,
NYSEG

John J. Ruspantini, CHMM
Project Environmental Specialist
Licensing & Environmental Operations

cc: J. M. Simone
K. A. White - BBL
K. Kulow - NYSDOH Oneonta

F:\lenv\doc\jjr\cross8.wpd