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November 22, 2010

Mr. Kevin Kelly, P.E.
Environmental Engineer
NYSDEC Region 7 – Division of Environmental Remediation
615 Erie Boulevard West
Syracuse, NY 13204-2400

Re: Meridian ERP
Site # B00180
IRM Work Plan for Excavation and Disposal of Lead-Contaminated Soil

Dear Mr. Kelly:

On behalf of Cayuga County, C&S Engineers, Inc. (C&S) has prepared this Work Plan for the excavation and disposal of lead-contaminated soils as an Interim Remedial Measure (IRM) at the above-referenced site. An area of lead-impacted soil at the site was identified via artifact evidence during a December 2000 site investigations undertaken by Cayuga County. The nature and extent of lead impacts to site soils have been further identified via sampling and laboratory analysis during the Brownfield Site Investigation sampling (April 2010). Documentation of the SI soil sampling was provided to the NYSDEC and NYSDOH in a July 2010 Interim Data Report, and was discussed during an August 11, 2010 meeting between NYSDEC, NYSDOH, Cayuga County, and C&S at the NYSDEC Region 7 office in Syracuse, NY. Figure 2 and Table 5 from the Interim Data Report are relevant to the lead-contaminated soil and are provided as Attachments 1 and 2, respectively, to this Work Plan.

Please note that the activities specified in this IRM Work Plan will be conducted concurrently with the closure of the site's underground storage tanks, a presumptive remedy that will be conducted in a manner consistent with Section 5.5 of NYSDEC's DER 10, *Technical Guidance for Site Investigation and Remediation*.

Soil Excavation and Disposal

The irregularly shaped lead-contaminated soil excavation area (Attachment 1) is presently demarcated with construction fencing. Locations of the SI samples are field-flagged and have been surveyed using differential GPS. Larger diameter herbaceous and

woody vegetation were cleared by Cayuga County in September 2010 by cutting above ground level. The site will be prepared for excavation by removing the construction fencing and marking the horizontal limits of excavation. Soils from within the area (including root masses) will be excavated to a depth of four to five feet (based on SI sampling results), loaded directly into properly permitted transport vehicles, and transported to the City of Auburn Landfill for disposal. Throughout the field activities, the IRM Contractor will be responsible for complying with local, state, and federal rules and regulations associated with construction practices, including maintenance of Construction Best Management Practices (BMPs) associated with erosion and sedimentation control.

Following excavation to the specified limits, soil confirmation/documentation samples for total lead will be collected from the excavation bottom and sidewalls. Sampling frequency shall be consistent with the frequency specified in Section 5.4 of NYSDEC's Guidance Document DER-10. Data Quality Control/Quality Assurance (QA/QC) for the IRM will be consistent with Analytical Services Protocol (ASP) 2005 and a Data Usability Summary Report (DUSR) will be prepared by an independent data validator.

After the confirmation/documentation samples are collected, a layer of separation material (plastic or geo-textile) will be placed in the excavation and the excavation will be backfilled with clean imported materials. The horizontal limits of the excavation area will be surveyed using differential GPS.

Community Air Monitoring

For the duration of ground-intrusive activities associated with the IRM, community air monitoring for particulates and VOCs will be implemented. Community air monitoring and fugitive dust control (if needed) will be implemented consistent with NYSDOH's Generic Community Air Monitoring Plan (CAMP) and NYSDEC's Technical and Guidance Memorandum 4031 *Fugitive Dust Suppression and Particulate Monitoring Program*. A copy of each of those documents is provided as Attachment 3. Documentation of the CAMP will be included in the IRM Report.

IRM Documentation

An IRM Report will be submitted to NYSDEC and NYSDOH that will include:

- A description of the IRM activities;
- A figure illustrating the horizontal and vertical limits of excavation and the location of each soil confirmation/documentation sample;

Mr. Kevin Kelly, P.E.
November 22, 2010
Page 3 of 3

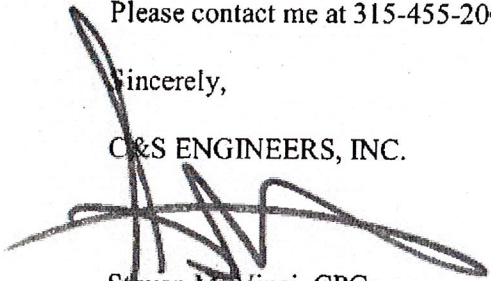
- Validated soil quality data for each confirmation/documentation sample collected and comparison of the data generated with Soil Cleanup Objectives (SCOs) listed in Subpart 375-6 and NYSDEC's Soil Cleanup Guidance document CP-51;
- Transport and disposal documentation for all soil leaving the site
- Documentation of the source and quality of fill materials brought onto the site; and
- Air monitoring data generated from implementation of the CAMP.

The IRM Report will be provided as a stand-alone document and subsequently appended to the Brownfields SI Report for the purpose of identifying the appropriate final remedy for the site.

Please contact me at 315-455-2000 if you have any questions.

Sincerely,

C&S ENGINEERS, INC.



Steven M. Vinci, CPG
Managing Geologist

Cc: Mr. Bruce Natale, Cayuga County Department of Planning and Economic
Development
Mr. Richard Jones, NYSDOH

Attachments

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Meridian Brownfields Site Investigation
 Table 5 - Total Lead Concentrations at Discrete Depth Intervals

Sample ID	LB-1	LB-2	LB-3	LB-4	LB-5	LB-6	LB-7	LB-8	Average
Lead Concentration in mg/kg (parts per million)									
A (0-0.5 ft)	717	276	194	2050	337	133	4650	99.2	1057.0
B (0.5-1.0 ft)	393	277	863	641	1060	196	1430	88.1	618.5
C (1.0-2.0 ft)	297	342	299	510	955	156	1000	36.9	449.5
D (2.0 -4.0 ft)	214	411	1540	708	492	39.1	762	99.7	533.2
E (4.0-5.0 ft)	103	45.2	53.5	517	6.3	19.8	8.9	6.8	95.1

The following table provides the NYSDEC's Soil Clean-up Objectives (SCOs) for lead from 6NYCRR Subpart 375-6:

Intended Use	SCO (ppm)
Unrestricted	63 or site background from NYSDOH rural soil survey
Residential	400
Restricted Residential	400
Commercial	1,000
Industrial	3,900
Protection of Ecological Resources	63 or site background from NYSDOH rural soil survey
Protection of Groundwater	450

Concentrations exceeding the residential clean-up criteria are shaded

ATTACHMENT 1

Figure 2 from Interim Data Report

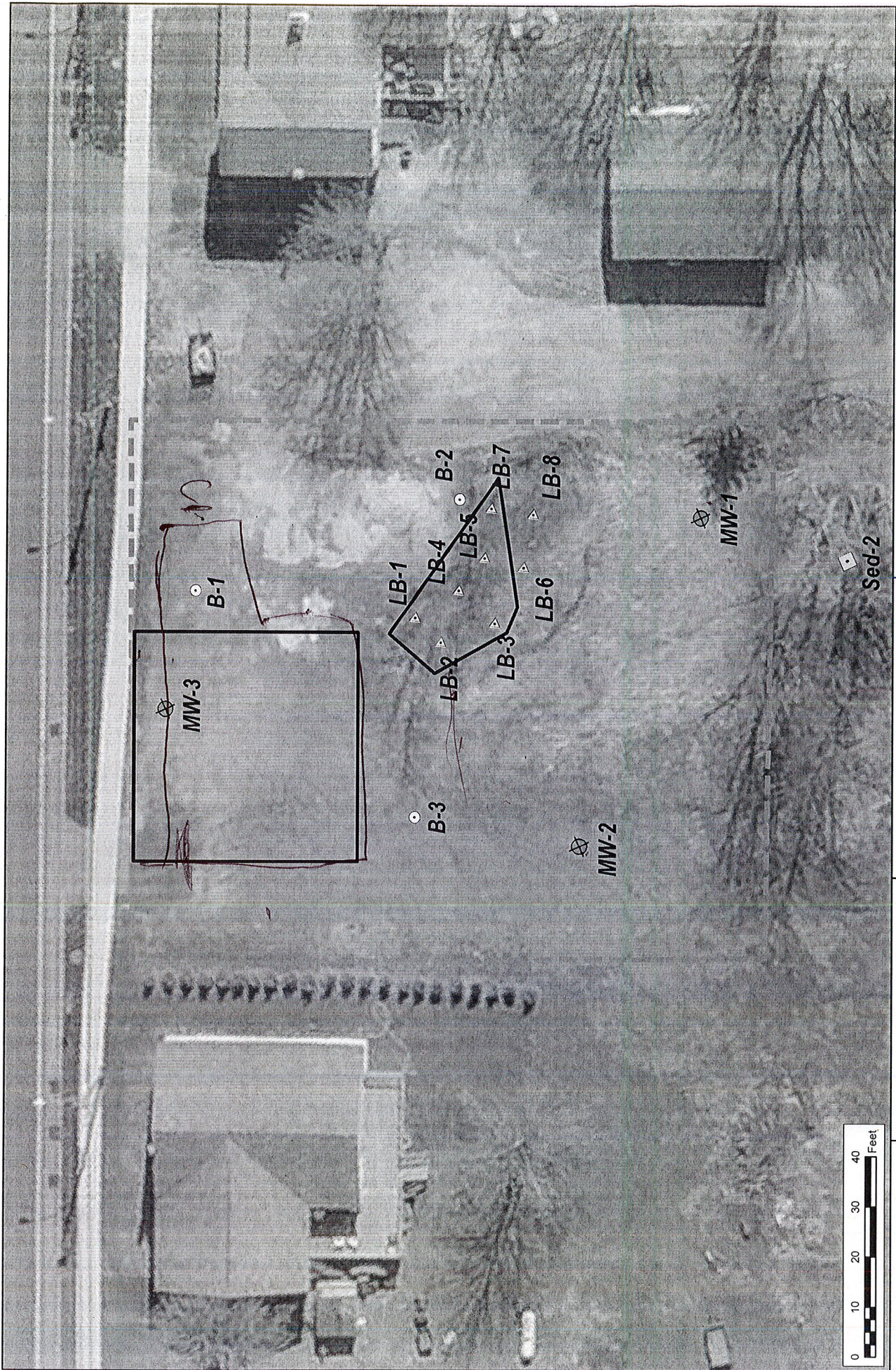


FIGURE 2
PRELIMINARY EXCAVATION
AREAS

Legend

- Approximate Parcel Boundary
- Fence
- Boring Location
- Sediment Sample Location
- Lead Boring Location
- Monitoring Well Location

Meridian Brownfields Site
Environmental Restoration Project
 Cayuga County, New York
 NYSDEC Brownfield Site #E712001

Source: 2008 Image from Planetwide
 Parcel Boundary from the Cayuga County New York
 "ImageMata On-Line" website.



ATTACHMENT 2

Table 5 from Interim Data Report