

March 25, 2009

R. Scott Deyette
New York State Department of Environmental Conservation
Division of Environmental Remediation
625 Broadway
Albany, NY 12233-7014

Subject: Interim Remedial Measure (IRM) Pre-Design Work Plan with attached Specifications
Fort Edward (Canal St.) Non-Owned Former MGP Site
Fort Edward, Washington County, Site #V00472

Dear Mr. Deyette,

Thank you for your March 16, 2009 letter regarding the February 2009 draft Interim Remedial Measure (IRM) Work Plan for the Fort Edward (Canal St.) non-owned former MGP site. We have considered and responded to each of your comments below.

1) Section 2.1, Objective, Page 8:

The document should use the NYSDEC Division of Environmental Remediation's Draft DER-10 Technical Guidance for Site Investigation and Remediation, December 2004 as the sole document used as guidance. Please remove all references to TAGMs, unless they are referenced from a report dated prior to December 2004.

Response: The IRM Work Plan has been revised as described above, except in Section 3.1.1, SCGs applicable to Surface Soils. In this section, site conditions are compared to average background concentrations of metals listed in Appendix A, Table 4 of TAGM 4046.

2) Section 3.1.2, Remedial Action for Surface Soils, Page 11:

Consistent with the sections that follow, the discussion of the excavation of shallow impacted soils (0-2 feet in the western portion of the site) should include acknowledgement that geotextile fabric and demarcation (orange fencing) will be added post excavation and before the clean fill is installed.

Response: The IRM Work Plan has been revised as described above.

3) Section 3.1.2, Remedial Action for Surface Soils, Page 11:

The RAO that describes addressing the potential for exposure through inhalation of contaminants volatilizing from residual soil contamination should be removed since the remaining constituents in the soil are not highly volatile. This RAO should be replaced with the potential for exposure to contaminated soils through inhalation of airborne particulates (dust). The IRM will address this potential exposure pathway. This modification applies to any section where the RAO related to volatilization is described.

Response: The RAO for volatile exposure was written in accordance with the Generic Remedial Action Objectives for soil listed in Appendix 4A of Draft DER-10 Technical Guidance for Site Investigation and Remediation, December 2002. National Grid, however, agrees with modifying the

RAO as described above. Therefore, the IRM will address the potential airborne particulate exposure pathway. Sections 3.1.2 and 3.2.2 of the IRM Work Plan, regarding the RAO, have been revised as described above.

4) Section 3.2.1, SCGs Applicable to Subsurface Soils, Page 14:

In the bulleted list, the text should specify that the remedy will achieve “Restricted” Residential Soil Cleanup Objectives (SCOs), so the text will be changed to “Part 375-6.8(b) Restricted Residential SCOs” for each item.

Response: The items in the bulleted list do not describe the proposed remedy. Instead, the list describes the soil borings in the IRM Pre-Design report that exceeded residential SCOs. Although the discussion of chemical data in this IRM Work Plan was kept consistent with the IRM Pre-Design report, the remedy was designed to meet the criteria for restricted-residential use. As such, the proposed changes to the items in the bulleted list have not been revised as described above.

5) Section 3.2.2, Remedial Action for Subsurface Soils, Page 15:

In the last paragraph, there is a typographical error in the first sentence after the word SCOs. Please revise accordingly.

Response: The IRM Work Plan has been revised as described above.

6) Section 3.5, Documentation Samples, Page 19:

For the 0-1 foot excavation associated with the former burn pit, the excavation perimeter of 40 linear feet seems excessive; is this correct?

Response: This perimeter is based on a 10' x 10' area excavated to approximately one foot below ground surface. The size of the proposed excavation does not change the number of confirmation samples required, so no change to the description of the excavation has been incorporated in the IRM Work Plan.

7) Section 3.5, Documentation Samples, Page 20:

Replace “composite” with “grab” for the excavation sidewall sampling in the first paragraph.

Response: The IRM Work Plan has been revised as described above.

8) Section 3.5, Documentation Samples, Page 20:

In the third paragraph, please remove Remedial Action Report and replace with Final Engineering Report (FER).

Response: The IRM Work Plan has been revised as described above.

9) Section 4.0, Use Limitations, Page 24:

In the first paragraph, second to last sentence, remove the date March 2005, and revise sentence to read “latest template”.

Response: The IRM Work Plan has been revised as described above.

10) Section 6.3, Emergency Contacts, Page 53:

Please add my cell phone number, (518) 461-3721.

Response: The IRM Work Plan has been revised as described above.

11) Section 6.5, Site Control, Page 60:

From a public safety perspective, visible site barriers and site security will be critical during the excavation work in the western portion of the site since the excavation will extend to the public roadway (Canal Street).

Response: The IRM Work Plan has been revised and now references perimeter fencing and off-hours security as described above.

12) Section 8.0, Community Air Monitoring Program, Page 73:

Please remove the last paragraph, as discussed in our conference call.

Response: The Community Air Monitoring Program (CAMP) within the IRM Work Plan has been revised as described above and VOC monitoring has been incorporated into the IRM Work Plan, as we discussed.

13) Section 8.2, VOC Monitoring, Response Levels, and Actions, Page 74:

Please remove entire section (see Comment 12).

Response: The CAMP within the IRM Work Plan has been revised as described above, and VOC monitoring has been incorporated into the IRM Work Plan, as we discussed.

14) Figure 3, Remedial Activities:

In the legend, revise demarcation terminology, as discussed in our conference call.

Response: The IRM Work Plan has been revised as we discussed.

15) Figure 4, Site Grading:

Revise the Restoration and Cover Detail to reflect 12 inches of topsoil and 12 inches of Sub grade Type B material, as discussed in our conference call.

Response: The IRM Work Plan has been revised as described above.

16) Appendix A, Emergency Assistance Information:

Please reference the text, Section 6.4.3, page 59, or place map here.

Response: The IRM Work Plan has been revised to include a Hospital route map in Appendix A, as described above.

17) Specifications, Section 02100, Site Preparation:

In section 3.2, please add that all erosion control measures are in place before this operation begins.

Response: The IRM Work Plan has been revised as described above

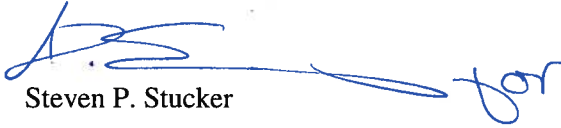
NYSDEC
Mr. Deyette

March 25, 2009

We have finalized the IRM Work Plan as described above. The Project Professional Engineer will seal the final plan and it will be distributed to the NYSDEC, NYSDOH, and the Village of Fort Edward.

If you have any questions or comments, then please contact me at (315) 428.5652 or steven.stucker@us.ngrid.com.

Sincerely,



Steven P. Stucker
Environmental Department

Cc:

Deanna Ripstein-New York State Dept. of Health
Rich Malcolm-MWH
Rich Hixon-MWH
Andrea Simmons-MWH