



August 2, 2007

James F. Hartnett
Remediation and Liability Management Company, Inc.
1 General Motors Drive
Suite 2
Syracuse, New York 13206-1127

Re: Ley Creek PCB Dredgings Site
June 2007 OM&M Inspection

File: 4966/34124 #2

Dear Jim:

This letter documents the Operation, Maintenance, and Monitoring (OM&M) site inspection conducted on June 29, 2007 by O'Brien & Gere at the Ley Creek PCB Dredgings Site (the Site), located in Syracuse, New York. This inspection was performed in accordance with the NYSDEC-approved OM&M Manual, dated September 2001. Also, this inspection is considered the annual OM&M inspection, in accordance with the change in inspection frequency approved by NYSDEC in its letter dated May 20, 2007.

SITE INSPECTION

On June 29, 2007, an OM&M site inspection was performed at the Site. The inspection checklist with comments is attached. The inspection photographs are also attached with descriptions of the photographs. The approximate locations of where the photographs were taken are shown on the attached site figures with corresponding photograph numbers.

The United States Environmental Protection Agency (USEPA) provided comments and recommendations in the January 2007 5-year review document. Table 1 provides a summary of the comments and recommendations along with actions performed to address these items. The summary of actions is based on O'Brien & Gere's construction observation field notes when the work was performed and observations noted during the OM&M inspection. Items not performed as of the date of inspection include asphalt repair, burrowing animal removal, drainage channel construction adjacent to stone access road, and placement of trash racks at the catch basins.

Also attached is a copy of the wetland vegetation mix that was placed by Royal Environmental, Inc. on May 25, 2007. The wetland area seeded is noted on Figures 1 and 2 and Photographs 11 and 12. This area will be inspected by O'Brien & Gere as part of the wetland inspection to be performed in Late Summer/Early Fall 2007.

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Establishment of vegetation in the areas that were repaired in the 2006 construction season to address erosion (Figures 3 and 4 and Photograph 4) has improved, but requires additional monitoring until fully established.

Issues observed during the June 2007 inspection are as follows:

- Animal burrow in vegetative cover (Figures 1, 2, and 4 and Photographs 5, 10 and 14)
- Exposed erosion control fabric within CB-3 overflow spillway (Figure 3 and Photograph 7)
- Lack of vegetation within CB-3 overflow spillway (Figure 1, 2, and 3 and Photograph 6, 11, and 12)
- Soil covering MW-12 and MW-13 monitoring well due to animal burrow (Figures 1 and 2 and Photographs 10 and 15)
- Phragmites in asphalt (Figure 1 and 2 and Photograph 16)
- Garbage near Factory Avenue (Figure 3)

The next OM&M inspection is scheduled to occur in the Spring of 2008.

If you should have any questions pertaining to the information presented in this letter, please feel free to contact me at (315) 437-6100.

Very truly yours,

O'BRIEN & GERE ENGINEERS, INC.



Bradley A. Kubiak, P.E.
Senior Project Engineer

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cc: Douglas Crawford, P.E.
Maureen Markert, P.E.


Inspection checklist

Date Performed: June 29, 2007		Weather: Sunny 72 F		
Site Name: Ley Creek PCB Dredgings Site		Inspector Name: Edwin B. Rahn		
Site Location: Syracuse, New York		Inspector Signature: <i>Edwin B. Rahn</i>		
Item	Task	Response		Comments
		Yes	No	
Visually inspect surface conditions.				
Vegetative Cover	1. Areas of settlement?		<input checked="" type="checkbox"/>	
	2. Areas of erosion?		<input checked="" type="checkbox"/>	
	3. Areas where geotextile visible due to erosion?		<input checked="" type="checkbox"/>	
	4. Areas of slope instability?		<input checked="" type="checkbox"/>	
	5. Lack or thinning vegetation?	<input checked="" type="checkbox"/>		Figures 1,2, and 3. Photographs 6, 11, and 12
	6. Presence of burrowing animals?	<input checked="" type="checkbox"/>		Figures 1,2, and 4. Photographs 5, 10, and 15
	7. Areas of damage?		<input checked="" type="checkbox"/>	
	8. Drainage problems?		<input checked="" type="checkbox"/>	
	9. Mowing required?		<input checked="" type="checkbox"/>	
Visually inspect conditions.				
Access Road	1. Areas of settlement?		<input checked="" type="checkbox"/>	

Inspection checklist

Date Performed: June 29, 2007		Weather: Sunny 72 F		
Site Name: Ley Creek PCB Dredgings Site		Inspector Name: Edwin B. Rahn		
Site Location: Syracuse, New York		Inspector Signature: <i>Edwin B. Rahn</i>		
Item	Task	Response		Comments
		Yes	No	
Access Road	2. Areas of erosion?		X	
	3. Areas rutted or potholes present?		X	
	4. Areas of damage?		X	
	Visually inspect ditches, catch basins, etc.			
Surface Water Drainage	1. Accumulation of debris?		X	
	2. Excessive scouring?	X		Figure 3 - Photograph 7
	3. Areas of damage?		X	
Visually inspect conditions.				
Ground Water Wells	1. Casings secure and locked?	X		
	2. Areas of damage?		X	
Visually inspect conditions.				
Sanitary sewer access paths	1. Cracks in asphalt?	X		Figure 1 and 2. Photograph 16
	2. Manhole covers in place?	X		

Inspection checklist

Date Performed: June 29, 2007		Weather: Sunny 72 F		
Site Name: Ley Creek PCB Dredgings Site		Inspector Name: Edwin B. Rahn		
Site Location: Syracuse, New York		Inspector Signature: 		
Item	Task	Response		Comments
		Yes	No	
Sanitary sewer access paths	3. Debris accumulating in access paths?		<input checked="" type="checkbox"/>	
Visually inspect fences and gates				
Physical Site Security	1. Signs intact?	<input checked="" type="checkbox"/>		
	2. Fence breached?		<input checked="" type="checkbox"/>	
	3. Access gates locked?	<input checked="" type="checkbox"/>		
	4. Areas of damage?		<input checked="" type="checkbox"/>	
Note any additional comments.				
Observation of burrowing animal holes seems to be increasing.				
Areas seeded in 2006 increasing in vegetation establishment.				
Wetland area seeded in 2007 has minimal establishment.				
Soil covering wells MW-12 and MW-13 due to burrowing animal holes.				
Garbage near Factory Ave around CB-2.				



Photograph 1: View of CB-5/Outfall 004 spillway.



Photograph 2: View looking west from CB-5/Outfall 004 outlet.



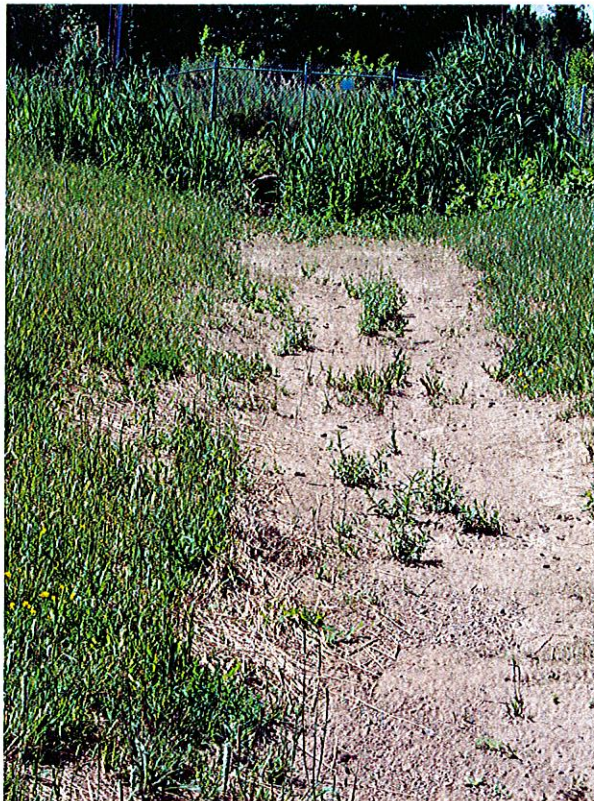
Photograph 3: View looking west from eastern stone access drive.



Photograph 4: View of area near OBG-26S, which was re-seeded in Fall of 2006.



Photograph 5: Burrowing animal hole along fenceline southeast of OBG-21D.



Photograph 6: Newly placed topsoil in CB-3 overflow spillway without vegetation establishment.



Photograph 7: View of eroded topsoil with visible erosion control fabric.



Photograph 8: View looking east from CB-3 outlet at repaired access road.



Photograph 9: View of Canada geese near CB-2 outlet.



Photograph 10: View of burrowing animal hole near MW-12.



Photograph 11: View looking west from eastern extent of re-seeded wetland area.



Photograph 12: View looking east from western extent of re-seeded wetland area.



Photograph 13: View looking east from CB-1.



Photograph 14: View looking at burrowing animal hole at MW-13.



Photograph 15: View of phragmites in pavement access drive.

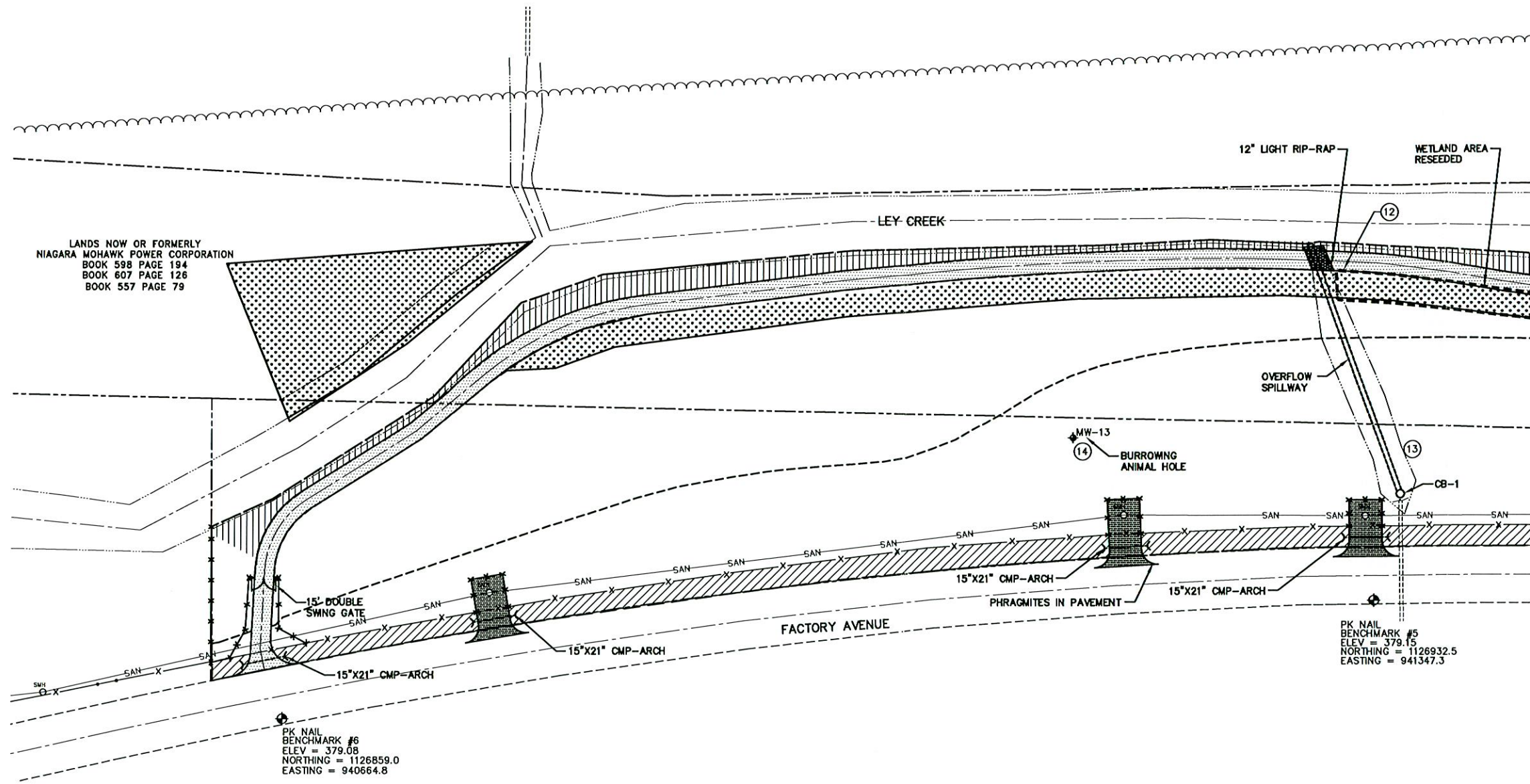


FIGURE 1

LEGEND

- SEEDED WITH CANARY GRASS
- OVERHEAD WIRES
- PROPERTY BOUNDARY
- EDGE OF WOODS
- UTILITY POLE
- GUY WIRE
- SANITARY SEWER
- SANITARY MANHOLE
- SECURITY FENCE
- PAVEMENT
- GRAVEL ACCESS ROAD
- LIMITS OF SOIL LOCATED ALONG FACTORY AVENUE RELOCATED BENEATH COVER SYSTEM
- CATCH BASIN
- MODIFIED MONITORING WELL
- MONITORING WELL PRESUMED DESTROYED
- ABANDONED MONITORING WELL
- NEW MONITORING WELL
- LIMITS OF EROSION CONTROL MAT
- LIMITS OF COVER SYSTEM
- LIMITS OF NON-WOVEN GEOTEXTILE
- PHOTOGRAPH LOCATION

LEY CREEK PCB DREDGINGS SITE
SYRACUSE, NEW YORK
SITE REMEDIATION PROJECT

JUNE 2007
OM&M INSPECTION
PARTIAL SITE PLAN



FILE NO. 4966.34124.071
JULY 2007



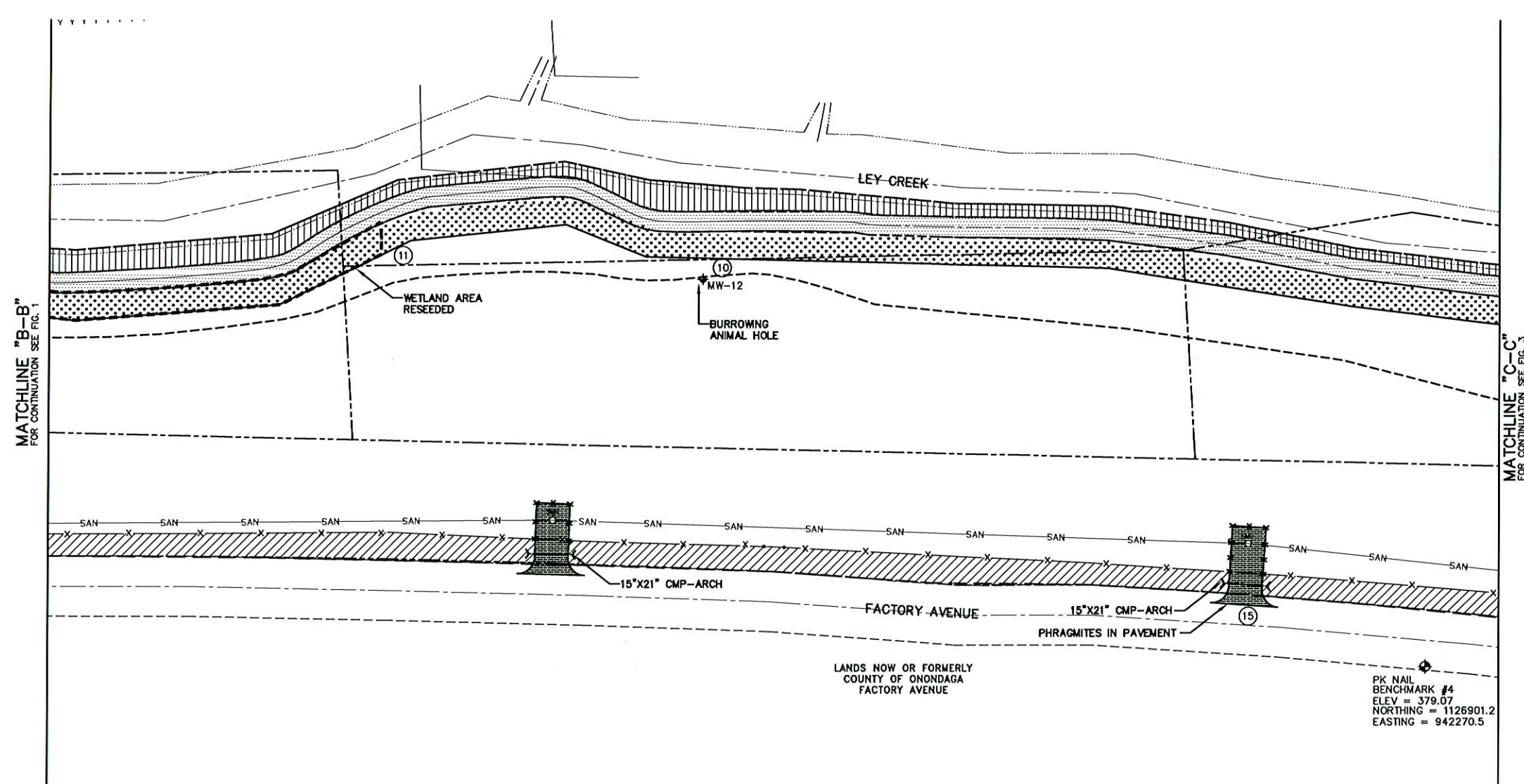


FIGURE 2

LEGEND

- SEEDED WITH CANARY GRASS
- OVERHEAD WIRES
- PROPERTY BOUNDARY
- EDGE OF WOODS
- UTILITY POLE
- GUY WIRE
- SANITARY SEWER
- SANITARY MANHOLE
- SECURITY FENCE
- PAVEMENT
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- LIMITS OF SOIL LOCATED ALONG FACTORY AVENUE RELOCATED BENEATH COVER SYSTEM
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- ABANDONED MONITORING WELL
- NEW MONITORING WELL
- LIMITS OF EROSION CONTROL MAT
- LIMITS OF COVER SYSTEM
- LIMITS OF NON-WOVEN GEOTEXTILE
- PHOTOGRAPH LOCATION

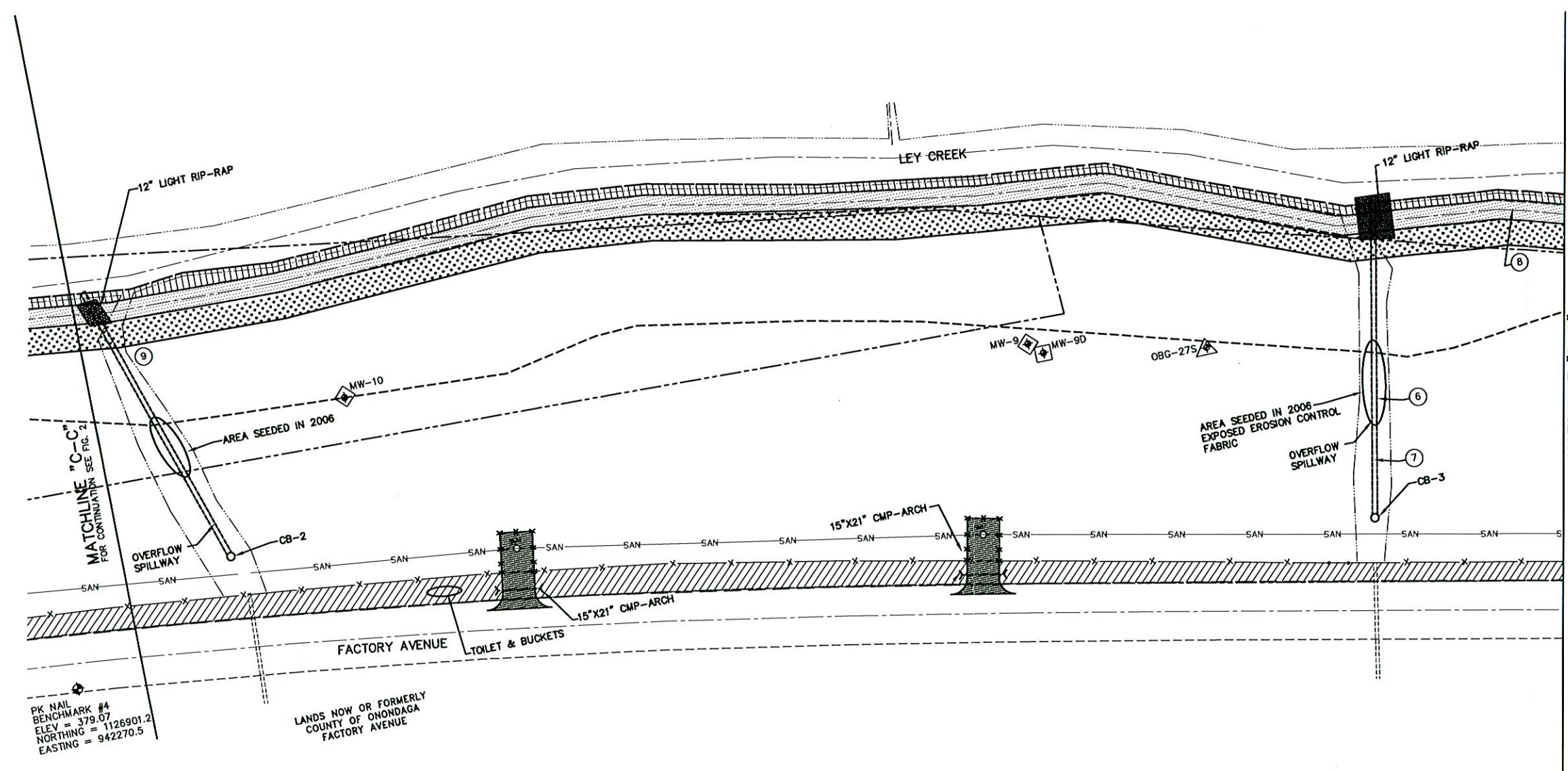
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FILE NO. 4966.34124.072
JULY 2007





PK NAIL
BENCHMARK #4
ELEV = 379.07
NORTHING = 1126901.2
EASTING = 942270.5

LANDS NOW OR FORMERLY
COUNTY OF ONONDAGA
FACTORY AVENUE



FIGURE 3

- LEGEND**
- SEEDED WITH CANARY GRASS
 - OVERHEAD WIRES
 - PROPERTY BOUNDARY
 - EDGE OF WOODS
 - UTILITY POLE
 - GUY WIRE
 - SANITARY SEWER
 - SANITARY MANHOLE
 - SECURITY FENCE
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 - LIMITS OF SOIL LOCATED ALONG FACTORY AVENUE RELOCATED BENEATH COVER SYSTEM
 - CATCH BASIN
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 - MONITORING WELL PRESUMED DESTROYED
 - ABANDONED MONITORING WELL
 - NEW MONITORING WELL
 - LIMITS OF EROSION CONTROL MAT
 - LIMITS OF COVER SYSTEM
 - LIMITS OF NON-WOVEN GEOTEXTILE
 - PHOTOGRAPH LOCATION

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FILE NO. 4966.34124.073
JULY 2007



MATCHLINE "D-D"
FOR CONTINUATION SEE FIG. 3

MATCHLINE "E-E"
FOR CONTINUATION SEE FIG. 5

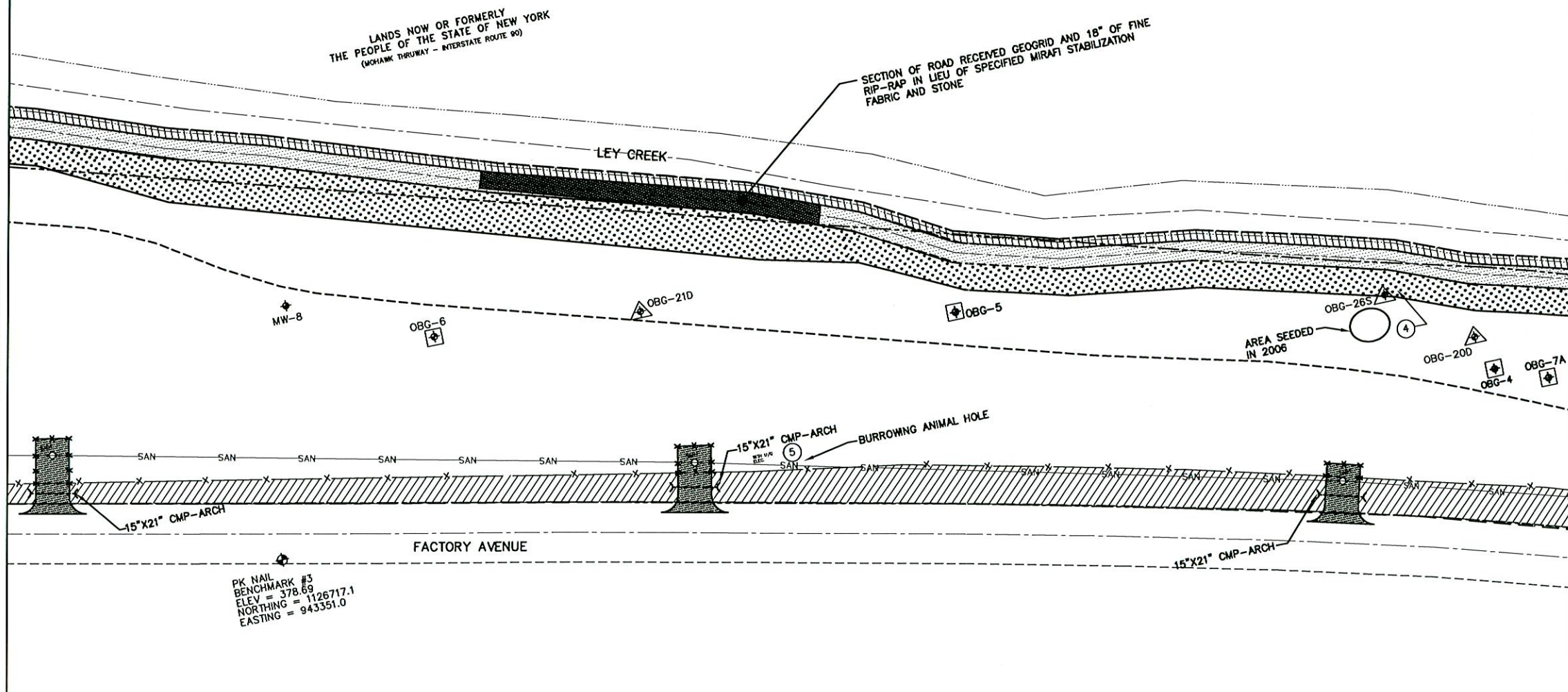


FIGURE 4

LEGEND

- SEEDING WITH CANARY GRASS
- OVERHEAD WIRES
- PROPERTY BOUNDARY
- EDGE OF WOODS
- UTILITY POLE
- GUY WIRE
- SANITARY SEWER
- SANITARY MANHOLE
- SECURITY FENCE
- PAVEMENT
- GRAVEL ACCESS ROAD
- LIMITS OF SOIL LOCATED ALONG FACTORY AVENUE RELOCATED BENEATH COVER SYSTEM
- CATCH BASIN
- MODIFIED MONITORING WELL
- MONITORING WELL PRESUMED DESTROYED
- ABANDONED MONITORING WELL
- NEW MONITORING WELL
- LIMITS OF EROSION CONTROL MAT
- LIMITS OF COVER SYSTEM
- LIMITS OF NON-WOVEN GEOTEXTILE
- PHOTOGRAPH LOCATION

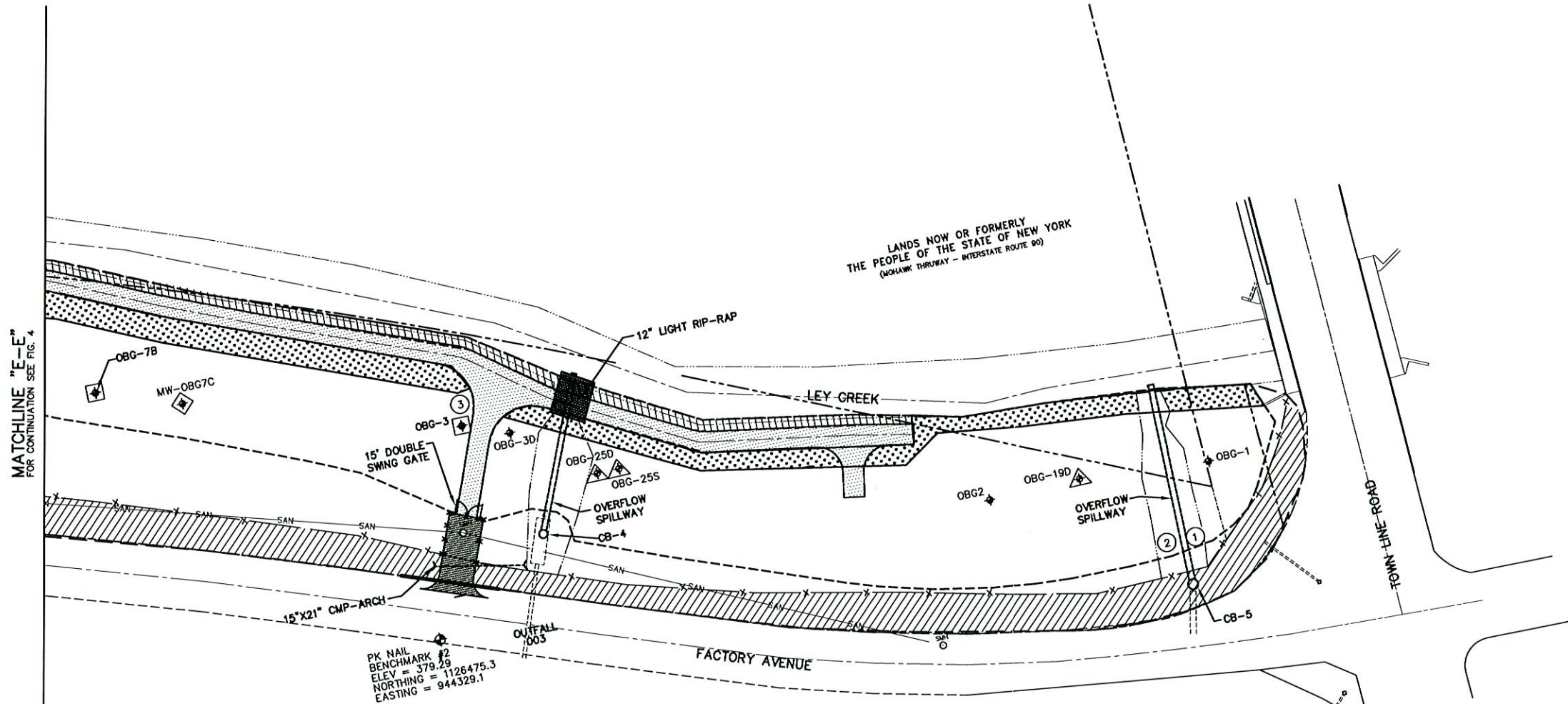
LEY CREEK PCB DREDGINGS SITE
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JUNE 2007
OM&M INSPECTION
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FILE NO. 4966.34124.074
JULY 2007





MATCHLINE "E-E"
FOR CONTINUATION SEE FIG. 4

FIGURE 5

LEGEND

- SEEDED WITH CANARY GRASS
- OVERHEAD WIRES
- PROPERTY BOUNDARY
- EDGE OF WOODS
- UTILITY POLE
- GUY WIRE
- SANITARY SEWER
- SANITARY MANHOLE
- SECURITY FENCE
- PAVEMENT
- GRAVEL ACCESS ROAD
- LIMITS OF SOIL LOCATED ALONG FACTORY AVENUE RELOCATED BENEATH COVER SYSTEM
- CATCH BASIN
- MW-OBG7C MODIFIED MONITORING WELL
- MONITORING WELL PRESUMED DESTROYED
- ABANDONED MONITORING WELL
- NEW MONITORING WELL
- LIMITS OF EROSION CONTROL MAT
- LIMITS OF COVER SYSTEM
- LIMITS OF NON-WOVEN GEOTEXTILE
- PHOTOGRAPH LOCATION

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FILE NO. 4966.34124.075
JULY 2007



Table 1. Ley Creek PCB Dredgings Site – USEPA 5-year review summary

USEPA COMMENT (USEPA 2007)	USEPA SUGGESTION (USEPA 2007)	SUMMARY OF ACTIONS
Common reed (<i>Phragmites australis</i>) and purple loosestrife (<i>Lythrum salicaria</i>), two highly invasive species, were observed in portions of the restored wetland and along Ley Creek. Measures should be implemented to deter their establishment.	Additional seeding of diverse selection of wetland plant species is recommended in the emergent portion of this wetland.	An approximate 360' long by 20' wide section of wetland area was disked and seeded with a wetland mix.
A portion of the wetland area was inadvertently mowed in 2004.	Post signs in the wetland area to prevent mowing of the area.	Signs were posted along wetland area.
Rutting of the stone access road has been observed.	Implement repair by placing additional crushed stone and improve drainage of the stone access road by constructing small drainage channels to convey ponded water from the road to Ley Creek. This could be performed by removal of less than 1 foot of vegetative cover material with subsequent replacement of crushed stone.	Crushed stone was placed in rutted areas of access road. Drainage channels not constructed.
Areas of the Subsite security fence were damaged.	Implement repairs to site security fence.	Repairs to security fence were completed.
Burrowing animals have been observed.	Conduct an assessment of actions to control burrowing animals at the site (e.g., removal of burrowing animals). Where needed, topsoil should be placed in holes and seed and fertilizer applied.	No action completed.
Topsoil has eroded away resulting in exposure of erosion control fabric.	Place topsoil over exposed erosion control fabric with subsequent seeding/fertilization.	Topsoil was placed over exposed erosion control fabric and seeded.
Vegetation has been observed through pavement/cracks in asphalt.	Remove vegetation from asphalt and repair cracks.	Vegetation removed from asphalt.
Significant vegetation observed within stone access road and stone access road turnaround at the eastern end of the Subsite.	Remove vegetation from stone access road and stone access road turnaround at the eastern end of the Subsite.	Vegetation in stone access road and turnaround was mowed.

Table 1. Ley Creek PCB Dredgings Site – USEPA 5-year review summary

USEPA COMMENT (USEPA 2007)	USEPA SUGGESTION (USEPA 2007)	SUMMARY OF ACTIONS
Tree establishment observed along the fence line.	Remove trees from fence line.	Trees were cut.
Clogged catch basins observed.	Unclog and replace grates in catch basins with trash racks to minimize clogging.	Grates at catch basins were unclogged.
Excessive bank scour observed due to clogged catch basins.	Place topsoil and seed over scoured areas.	Topsoil and seed were placed in scoured areas.
Pavement depression observed.	Repair pavement depression with like asphalt.	No action completed.
Some of the minor deficiencies observed in the site remedy have not been addressed in a timely fashion.	Future OM&M inspection reports should be immediately provided to the oversight agencies. The reports should note any previously reported deficiencies which have not been addressed as well as include a schedule for the implementation of all needed corrective measures.	Comments will be addressed in future reports.
Institutional controls to preclude activities that could potentially expose contaminated materials and to ensure that the integrity of the cover is maintained have not been put into place.	The potentially responsible party needs to put the deed restrictions in place.	Deed restriction in progress.
New York State now requires annual certifications that institutional controls that are required by RODs are in place and that remedy-related operation, maintenance, and monitoring (OM&M) is being performed.	On an annual basis, the Subsite will need to be inspected to determine whether any intrusive activities have been performed at the Subsite and the building and property records will need to be reviewed to ascertain whether or not any filings had been made for such activities. The OM&M report that is currently submitted should include a summary of the findings of the above-noted activities, along with certifications that the institutional controls are in place (once they are put into place) and that remedy-related OM&M is being performed.	The 2007 annual report will address the items noted.

USEPA. 2007. *Five Year Review Report, Ley Creek PCB Dredgings Subsite Onondaga Lake Site, Onondaga County, Town of Salina, New York*. January 2007.



FACSIMILE TRANSMITTAL SHEET

TO: Ed Rahn	FROM: Maria
COMPANY: OBG	DATE: June 6
FAX NUMBER: 463-7554	TOTAL NO. OF PAGES INCLUDING COVER: 2
PHONE NUMBER:	SENDER'S REFERENCE NUMBER:
RE:	YOUR REFERENCE NUMBER:

URGENT FOR REVIEW PLEASE COMMENT PLEASE REPLY PLEASE RECYCLE

NOTES/COMMENTS:

SEED TAG MIX USED IN 2007
 SEEDED WETLAND AREA BY ROYAL
 * PER TODD SCOVILLE (ROYAL) CONVERSATION
 WITH ED RAHN (O'BRIEN & GERE)

RECEIVED

JUN 06 2007

O'BRIEN & GERE ENGINEERS
SYRACUSE, NY


ERNST Conservation Seeds LP

 9006 Mercer Pike, Meadville, PA 16335-9299
 (800) 873-3321 or (814) 336-2404

Seasonally Flooded Wildlife Food Seed Mix

Item	Botanical Name	Purity	Germ	Hard	Dorm	Production Origin	Genetic Origin
Virginia Wild Rye	<i>Elymus virginicus</i>	19.91%	94.5%			PA	
Fox Sedge	<i>Carex vulpinoidea</i>	17.31%	84.0%		8.0%	PA	
Deer Tongue, Tioga	<i>Panicum clandestinum</i>	14.99%	14.0%		82.0%	PA	
PA Smartweed	<i>Polygonum pennsylvanicum</i>	14.97%	70.0%			NE	
Japanese Millet	<i>Echinochloa crusgalli frumosa</i>	14.94%	96.0%			KS	
Switch Grass, Variety Not Stated	<i>Panicum virgatum, VNS</i>	4.99%	51.5%		37.5%	PA	
Blunt Broom Sedge	<i>Carex scoparia</i>	2.59%	84.0%		8.0%	PA	
Autumn Bentgrass	<i>Agrostis perennans</i>	1.97%	87.0%			OR	
Awl Sedge	<i>Carex stipata</i>	1.74%	90.0%			PA	
Showy Ticktrefoil	<i>Desmodium canadense</i>	1.00%	84.0%	6.0%		PA	
Bladder (Star) Sedge	<i>Carex brumescens</i>	0.99%	4.5%		88.5%	PA	
Path Rush	<i>Juncus tenuis</i>	0.97%	1.5%		78.5%	ID	

Other Crop: 0.02%
 Inert Matter: 3.57%
 Weed Seed: 0.04%

Net Weight: 4 LB
 Lot Number: ERNMX-128-070309
 Date Tested: January 2007

RECEIVED

JUN 06 2007

**O'BRIEN & GERE ENGINEERS
 SYRACUSE, NY**