

New York State Department of Environmental Conservation

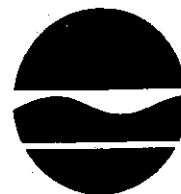
Division of Environmental Remediation

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Alexander B. Grannis
Commissioner

49lob/34124 #2

CFL
MSM
BAK
RPC

May 30, 2007

James Hartnett
Remediation and Liability Management Company
1 General Motors Drive
Syracuse, NY 13206-1127

Dear Mr. Hartnett:

Re: Ley Creek PCB Dredgings Site
2006 Annual OM &M Inspection Report

Dear Mr. Hartnett:

In January 2007, REALM submitted documentation on the site inspections conducted at the Ley Creek Dredgings Site in 2006. This letter is to address requests for modifications to the OM &M inspections based upon information and trends found during those inspections of 2006 and prior.

Monitoring Frequency

As stated in your letter of January 10, 2007, in 2005 (and again in 2006) in accordance with the OM &M Manual for this site, an evaluation was performed regarding inspection frequency for the site. Based upon this evaluation, REALM has indicated the inspections have observed only minor deficiencies and no major deficiencies. REALM requests that the monitoring frequency for routine site inspections be modified from semi-annual to annual, beginning in 2007. Provided that the recommendations as outlined in the January 2007 5-year review performed by the USEPA are implemented in 2007 and continued as necessary thereafter, and that the issues observed during the October 3, 2006 inspections are addressed in 2007, the NYSDEC concurs with the modification from semi-annual to an annual inspection frequency.

Wetland Establishment


The OM &M Manual required that after the fifth year of wetland monitoring an assessment of the continued need for monitoring of the wetland area would be performed. In 2006, REALM proposed that an additional year of monitoring be performed. REALM has indicated that three of the four monitored plots have met the criterion of 90% groundcover of seeded and wetland - dependent species. In the area of the fourth plot, REALM has proposed a wetland enhancement effort, as provided in the November 30, 2006 Wetland Evaluation report. REALM has proposed that monitoring of the first three plots be discontinued and that the fourth plot (the enhanced area) be monitored, after the enhancement is performed, for one additional year (2007). Upon completion of the 2007 evaluation, the need for

continued wetland monitoring and maintenance would be assessed. The NYSDEC concurs with this approach.

Please note that all future correspondence regarding OM &M should be addressed to me, Susan Edwards, in lieu of Gerald Rider.

If you have any questions concerning this letter, please call me at 518-402-9767.

Sincerely,



Susan Edwards
Project Manager

cc: Bradley Kubiak-OB&G