



Remediation and Liability Management Company Inc.

**James F. Hartnett
Program Manager**

January 29, 2009

Ms. Susan Edwards, P.E.
Bureau of Central Remedial Action
Division of Environmental Remediation
New York State Department of Environmental Conservation
625 Broadway, 12th floor
Albany, New York 12233

Re: Ley Creek PCB Dredgings Site (Registry # 7-34-044)
NYSDEC Order on Consent Index # D-7-0008-97-06
2008 Annual OM&M Inspection Report

Dear Ms. Edwards,

The purpose of this letter is to summarize Operation, Maintenance, and Monitoring (OM&M) activities that were conducted at the Ley Creek PCB Dredgings Site (Site) in 2008. The 2008 OM&M activities included one annual site inspection.

The site inspection was performed on September 5, 2008 in accordance with the NYSDEC-approved OM&M Manual (O'Brien & Gere 2001) for the Site, and in accordance with NYSDEC's letter dated May 30, 2007, which approved an annual inspection frequency. The OM&M Inspection Report is included in Attachment 1. The table in Attachment 2 summarizes the status of the site inspection recommendations, as well as recommendations from the five-year review that were outstanding at the time of the January 2008 annual report.

The recommendation in the January 31, 2008 Annual OM&M report to establish a 0.6 acre vegetation buffer in lieu of continued wetland monitoring was approved by NYSDEC in its letter dated May 13, 2008. It was observed during the September 2008 inspection that the vegetation buffer appears to be well established.

As requested in the five-year review report, a certification that remedy-related OM&M is being performed is presented as Attachment 3.

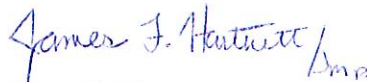
Ms. Susan Benjamin, P.E.

January 29, 2009

Page 2 of 2

Should you or your staff have any questions regarding the contents of this annual OM&M Inspection Report, please contact me at (315) 463-2391.

Sincerely,

A handwritten signature in blue ink that reads "James F. Hartnett".

James F. Hartnett
Remediation Program Manager

Enclosure

cc: James Burke (NYSDEC)
Robert Nunes (USEPA)
Douglas Crawford, P.E. (O'Brien & Gere)
Maureen S. Markert, P.E. (O'Brien & Gere)

Attachment 1

September 2008 OM&M Inspection Report

file copy



O'BRIEN & GERE

January 6, 2009

Mr. 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
September 2008 OM&M Inspection

File: 4966/34124 #2

Dear Jim:

This letter documents the Operation, Maintenance, and Monitoring (OM&M) site inspection conducted on September 5, 2008 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 New York State Department of Environmental Conservation (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 30, 2007.

SITE INSPECTION

On September 5, 2008, 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 January 31, 2008 Annual OM&M report included a table of comments and recommendations from the United States Environmental Protection Agency January 2007 5-year review document. The outstanding recommendations identified in the report have not been completed: the removal of burrowing animals, the filling and reseeded/fertilizing of holes, and the placement of trash racks at the catch basins.

Issues observed during the September 2008 inspection are as follows:

- A number of animal burrows in the vegetative cover (Example: Figure 4 and Photograph 7)
- High grass along the service road (Figures 2 and 5 and Photographs 1 and 14)
- Bent monitoring well sign (OBG-2) (Figure 5 and Photograph 5)

Mr. James F. Hartnett
January 6, 2009
Page 2 of 2

- Tree growing in the security fence (Figure 2 and Photograph 15)
- Catch basins plugged (CB-3 and CB-4) (Figure 3 and 5 and Photograph 10)

The recommendation in the January 31, 2008 Annual OM&M report to establish a 0.6 acre vegetation buffer in lieu of continued wetland monitoring was approved by NYSDEC in its letter dated May 13, 2008. It was observed during the September 2008 inspection that the vegetation buffer appears to be well established.

The next OM&M inspection is scheduled to occur in the Summer of 2009.

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.



Maureen S. Markert P.E.
Senior Project Engineer

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cc: Douglas Crawford, P.E.
Bradley A. Kubiak, P.E.

Inspection checklist

Date Performed: September 5, 2008			Weather: Sunny 75 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	
Vegetative Cover	Visually inspect surface conditions.			
	1. Areas of settlement?		X	
	2. Areas of erosion?		X	
	3. Areas where geotextile visible due to erosion?		X	
	4. Areas of slope instability?		X	
	5. Lack or thinning vegetation?		X	
	6. Presence of burrowing animals?	X		Observed 7 holes between CB-3 & CB-4. Photograph 7.
	7. Areas of damage?		X	
	8. Drainage problems?		X	
	9. Mowing required?	X		Photographs 1, 9 and 14.
Access Road	Visually inspect conditions.			
	1. Areas of settlement?		X	

Inspection checklist

Date Performed: September 5, 2008			Weather: Sunny 75 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	
Surface Water Drainage	Visually inspect ditches, catch basins, etc.			
	1. Accumulation of debris?	X		CB-3 & CB-4 were plugged. Photograph 10.
	2. Excessive scouring?		X	
	3. Areas of damage?		X	
Ground Water Wells	Visually inspect conditions.			
	1. Casings secure and locked?	X		
	2. Areas of damage?	X		Sign for OBG-2. Photograph 5.
Sanitary sewer access paths	Visually inspect conditions.			
	1. Cracks in asphalt?		X	
	2. Manhole covers in place?	X		

Inspection checklist

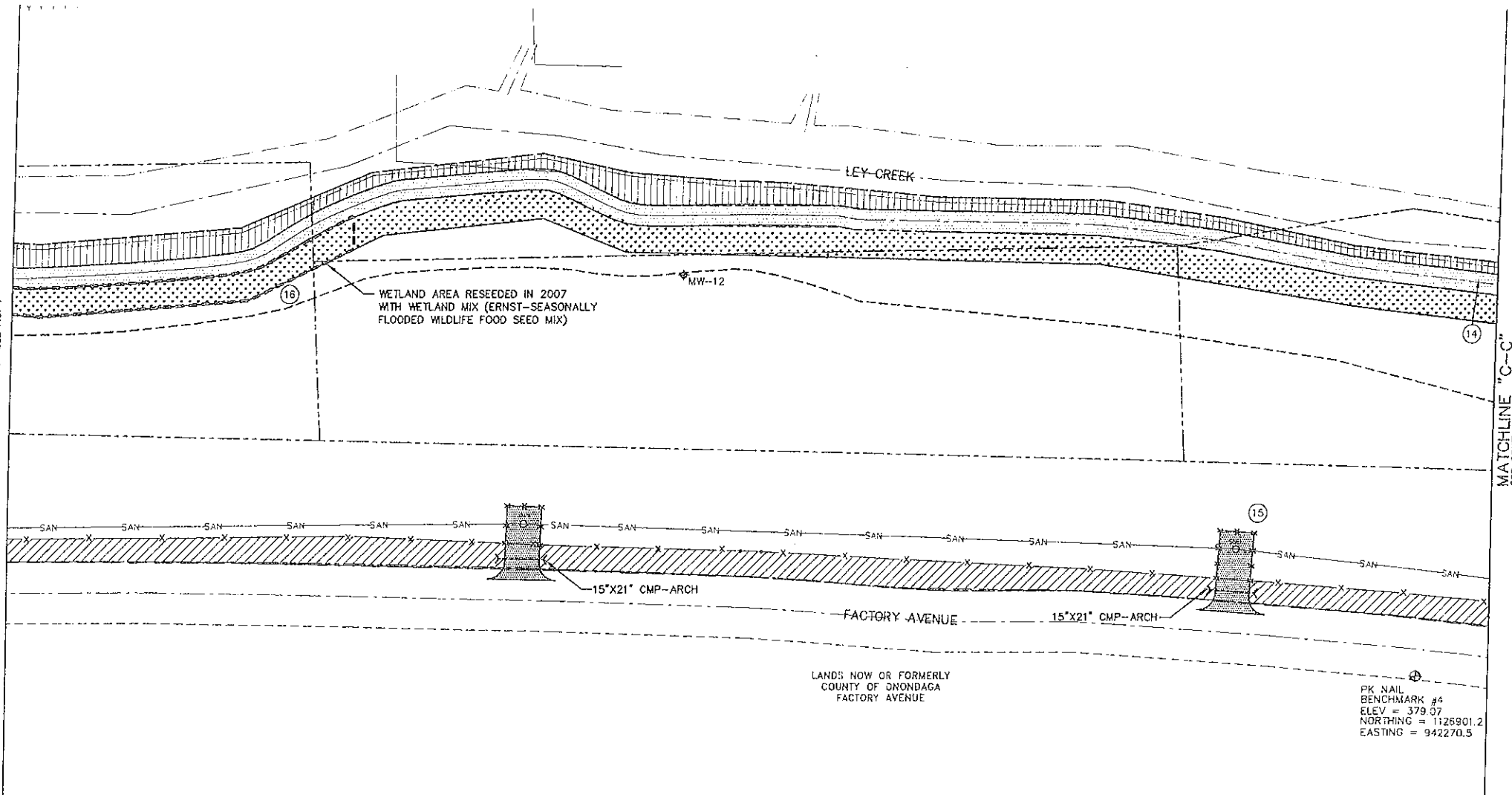
Date Performed: September 5, 2008			Weather: Sunny 75 F	
Site Name: Ley Creek PCB Dredgings Site			Inspector Name: Edwin B. Rahn	
Site Location: Syracuse, New York			Inspector Signature: <i>Edwin B. Rahn</i>	
Item	Task	Response		Comments
		Yes	No	
Sanitary sewer access paths	3. Debris accumulating in access paths?		X	
Physical Site Security	Visually inspect fences and gates			
	1. Signs intact?	X		
	2. Fence breached?		X	
	3. Access gates locked?	X		
	4. Areas of damage?		X	
Note any additional comments.				
Observation of burrowing animal holes seems to be increasing.				
Area seeded in 2007 has vegetation established. Photograph 16.				
The 15-foot width of wetland and the 5-foot width of buffer south of the service road looks well established.				
Tree growing in the security fence. Photograph 15.				



Dec 05, 2008 12:23pm

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MATCHLINE "B-B"
FOR CONTINUATION SEE FIG. 1



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

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
- GRAVEL ACCESS ROAD
- LIMITS OF SOIL LOCATED ALONG FACTORY AVENUE RELOCATED BENEATH COVER SYSTEM
- CATCH BASIN
- MW-08G7C 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

SEPTEMBER 2008
OM&M INSPECTION
PARTIAL SITE PLAN

1" = 40' 40 0 40

FILE NO. 4966.34124.077
DECEMBER 2008

O'BRIEN & GERE
ENGINEERS, INC.

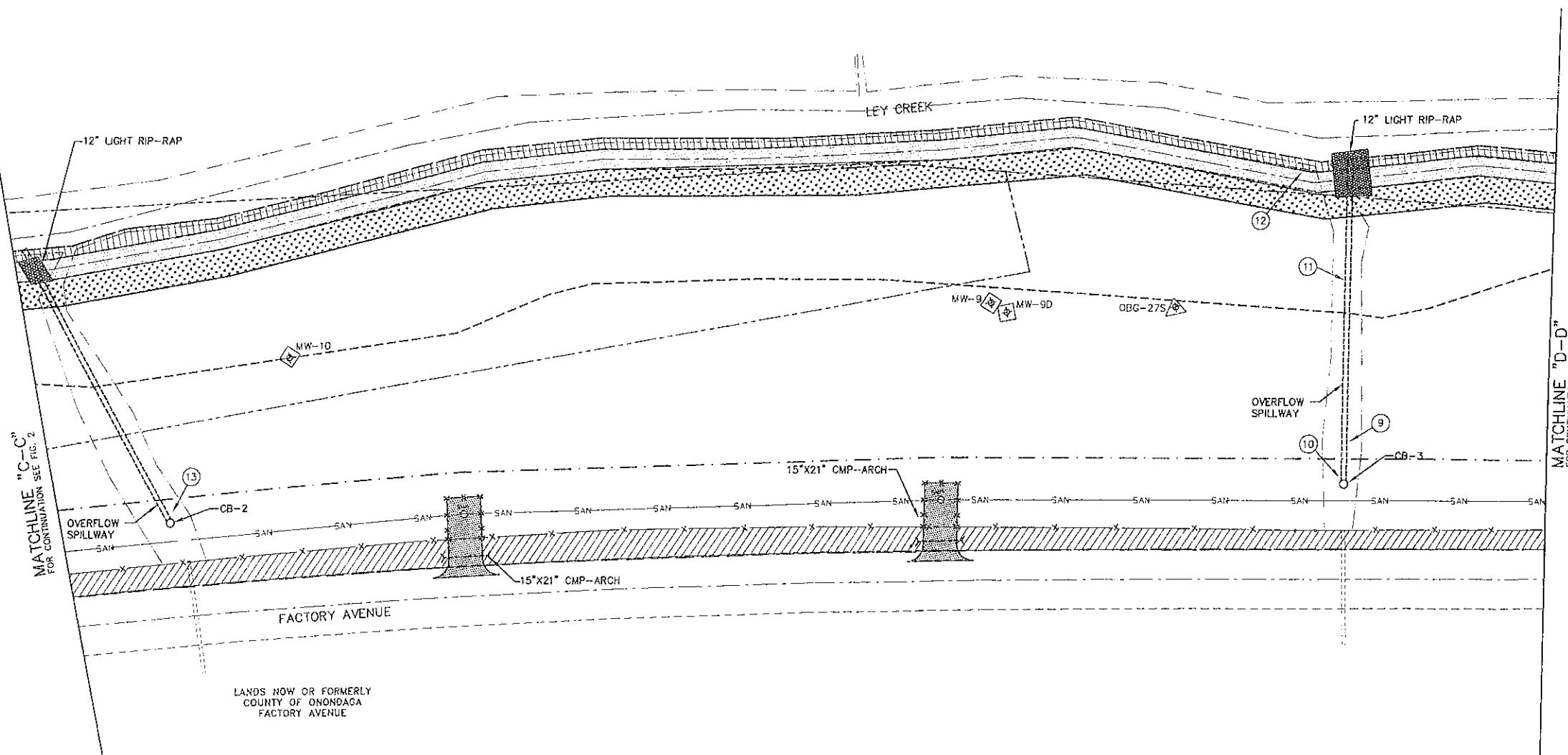


FIGURE 3

LEGEND

- SEEDED WITH CANARY GRASS
- OVERHEAD WRES
- PROPERTY BOUNDARY
- EDGE OF WOODS
- UTILITY POLE
- GUY WRE
- 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

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

SEPTEMBER 2008
OM&M INSPECTION
PARTIAL SITE PLAN



FILE NO. 4966.34124.078
DECEMBER 2008



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

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

LANDS NOW OR FORMERLY
THE PEOPLE OF THE STATE OF NEW YORK
(NICHAM INHURWAY - INTERSTATE ROUTE 92)

SECTION OF ROAD RECEIVED GEOGRID AND 18" OF FINE
RIP-RAP IN LIEU OF SPECIFIED MIRAFI STABILIZATION
FABRIC AND STONE

LEY CREEK

MW-B (8)

OBC-6

OBC-21D (7)

OBC-5

OBC-26S

OBC-20D

OBC-4

OBC-7A

15"x21" CMP-ARCH
SAN
15"x21" CMP-ARCH

FACTORY AVENUE

15"x21" CMP-ARCH

PK NAH
BENCHMARK #3
ELEV = 378.68
NORTHING = 1126717.1
EASTING = 943351.0

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
- MW-OBC7C 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

SEPTEMBER 2008
OM&M INSPECTION
PARTIAL SITE PLAN

1"=40'

FILE NO. 4966.34124.079
DECEMBER 2008

O'BRIEN & GERE
ENGINEERS, INC.

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

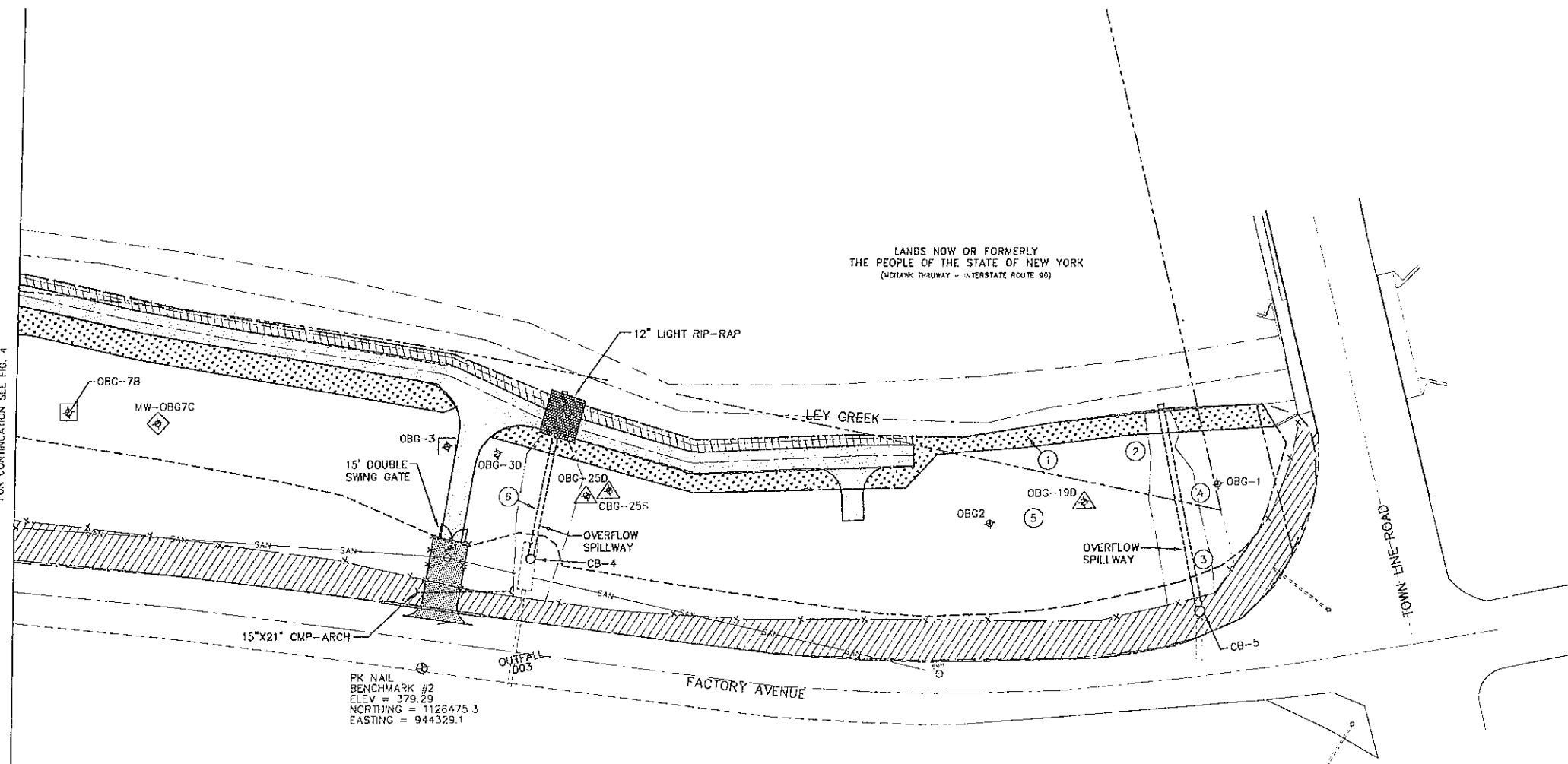


FIGURE 5

LEGEND

- SEEDING WITH CANARY GRASS
- CHW— OVERHEAD WIRES
- PROPERTY BOUNDARY
- EDGE OF WOODS
- UTILITY POLE
- GUY WIRE
- SAN — SANITARY SEWER
- SMH ○ SANITARY MANHOLE
- X—X—X 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
- ③ PHOTOGRAPH LOCATION

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

SEPTEMBER 2008
OM&M INSPECTION
PARTIAL SITE PLAN

1" = 40'

FILE NO. 4966.34124.080
DECEMBER 2008

O'BRIEN & GERE
ENGINEERS, INC.



Photograph 1: View of East end of Service Road looking West.



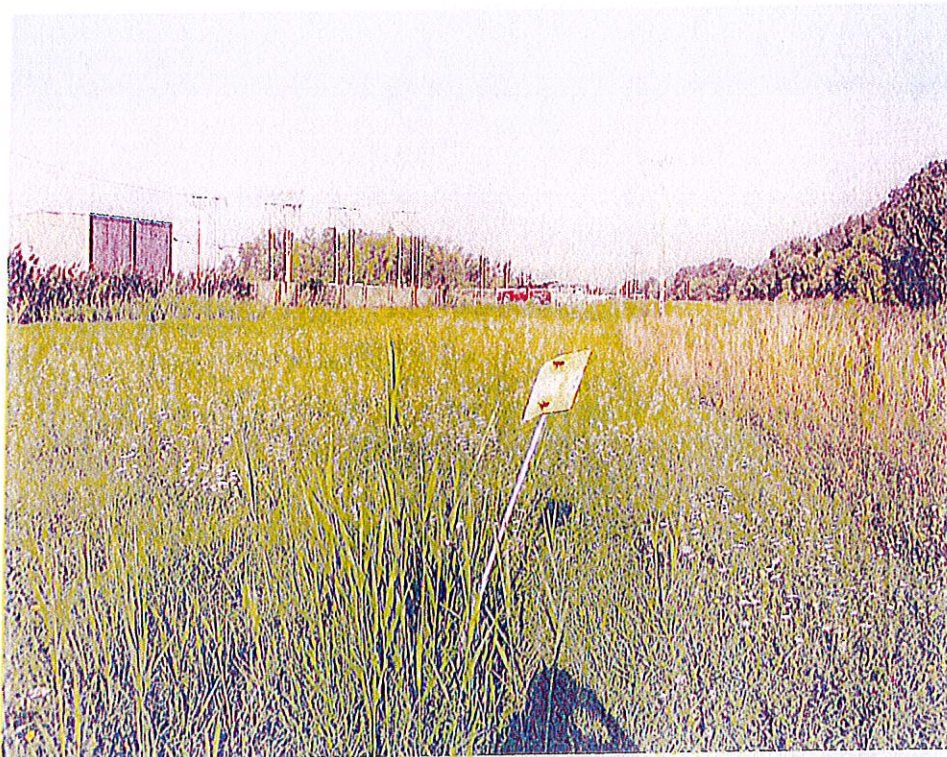
Photograph 2: View looking west at monitoring well OBG-19D.



Photograph 3: Outfall 004 and CB-5.



Photograph 4: View from East end looking West.



Photograph 5: Looking West from Monitoring Well OBG-2.



Photograph 6: CB-4.



Photograph 7: Animal burrow east of OBG-21D.



Photograph 8: View looking west from MW-8.



Photograph 9: CB-3.



Photograph 10: View of CB-3.



Photograph 11: View of CB-3 overflow channel.



Photograph 12: Rip-rap repair at bank erosion location near the outfall from CB-3.



Photograph 13: CB-2.



Photograph 14: View along access road looking West from CB-2 outfall.



Photograph 15: Tree in fence west of CB-2.



Photograph 16: Looking west at area reseeded in 2007.



Photograph 17: CB-1.



Photograph 18: View looking North at MW-13.



Photograph 19: View looking west at West end of property.



Photograph 20: West end turn-around.

Attachment 2
Status of recommendations

Issue	Recommended Action	Status
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 (USEPA 2007).	A New York State licensed trapper will trap burrowing animals from the Site in the areas noted in the September 2008 OM&M inspection report.	To be performed in spring 2009.
Replace grates in catch basins with trash racks to minimize clogging (USEPA 2007).	Evaluation of engineering controls being conducted to minimize clogging at CB-1, CB-2, and CB-3. CB-5/004 receives minimal flow and CB-4/003 does not generally clog with debris.	Evaluated in August 2007. Installation of recommended trash racks to be performed in spring 2009.
Soil covering MW-12 and MW-13 due to burrowing animal (O'Brien & Gere 2007).	A New York State licensed trapper will trap burrowing animals from areas. Material covering and around the monitoring wells will be placed back in the burrow and additional topsoil and seed placed, if necessary. If excess material is generated, it will be properly characterized and disposed.	Material replacement and seeding completed in September 2007. Trapping to be performed in spring 2009.
High grass was observed along the service road (O'Brien & Gere 2009).	Grass will be mowed as part of routine spring maintenance activities.	To be performed in spring 2009.
The sign for monitoring well OBG-2 was observed to be bent (O'Brien & Gere 2009).	The sign will be repaired concurrent with routine spring maintenance activities.	To be performed in spring 2009.
A tree was observed to be growing in the security fence (O'Brien & Gere 2009).	The tree will be cut down concurrent with routine spring maintenance activities.	To be performed in spring 2009.

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

O'Brien & Gere. 2007. O'Brien & Gere Engineers, Inc. *June 2007 OM&M Inspection Report*. August 2, 2007.

O'Brien & Gere. 2009. O'Brien & Gere Engineers, Inc. *September 2008 OM&M Inspection Report*. January 6, 2009.

Attachment 3
OM&M Certification

ENGINEER'S CERTIFICATION

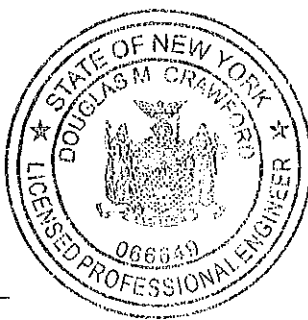
Owner: REALM
Site: Ley Creek PCB Dredgings Site
Registry Site # 7-34-044
Project: Operation and Maintenance
Engineer: O'Brien & Gere
Contractor: Royal Environmental

Recitals

1. Remediation and Liability Management Company (REALM) and the New York State Department of Environmental Conservation (NYSDEC) entered into an Order on Consent (Index # D-7-0008-97-06) that became effective upon the signature by the NYSDEC on July 15, 1999 (the "Order"). The Order requires REALM, among other things, to conduct Operation and Maintenance (O&M) activities at the Ley Creek PCB Dredgings Site (the "Site") in accordance with the approved O&M Manual for the Site.
2. The NYSDEC has approved the following document, which details the O&M requirements for the Site:
 - Operation, Maintenance, and Monitoring Manual; Ley Creek PCB Dredgings Site; Syracuse, New York. September 2001.

Certification

The annual inspection of the Site was performed under my supervision. Based on my inquiry of the person or persons responsible for conducting the inspection, I hereby certify that the OM&M activities were performed as described in this report.



By: Douglas M. Crawford
Douglas M. Crawford, P.E.
Vice President
O'Brien & Gere Engineers, Inc.

Date: 1/27/07