



January 26, 2010

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: Motors Liquidation Company- Ley Creek PCB Dredgings Site (Registry # 7-34-044)  
NYSDEC Administrative Order on Consent Index # D-7-0008-97-06  
2009 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 2009. The 2009 OM&M activities included the annual site inspection and associated annual monitoring and maintenance activities.

The site inspection was performed on October 30, 2009 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 2008 site inspection recommendations, as well as recommendations from the five-year review that were outstanding at the time of the January 2009 annual report.

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

Please contact me at (937) 478-8221 should you have any questions or require further information.

Sincerely,

A handwritten signature in black ink that reads "Pamela L. Barnett". The signature is written in a cursive, flowing style.

Pamela L. Barnett, PG  
Project Manager  
BOW Environmental Solutions, Inc. on behalf of MLC

Enclosure  
Distribution

Ley Creek Site Distribution List:

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James Burke  
New York State Department of Environmental of Conservation  
615 Erie Boulevard West  
Syracuse, NY 13204

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Robert Nunes  
Unite States Environmental Protection Agency  
Region II  
290 Broadway, 20<sup>th</sup> Floor  
New York, NY 10007-1866

**Attachment 1**

**October 2009 OM&M Inspection Report**



January 26, 2010

Pamela Barnett, P.G.  
BOW Environmental Solutions, Inc.  
3400 Deweese Pkwy  
Dayton, Ohio 45414

Re: Ley Creek PCB Dredgings Site  
October 2009 OM&M Inspection

File: 14774/45220 #2

Dear Pam:

This letter documents the Operation, Maintenance, and Monitoring (OM&M) site inspection conducted on October 30, 2009 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 October 30, 2009, 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 6, 2009 Annual OM&M report identified the following outstanding recommendations from the United States Environmental Protection Agency January 2007 5-year review document: the removal of burrowing animals, the filling and reseeded/fertilizing of holes, and the placement of trash racks at the catch basins. Removal of burrowing animals and filling and reseeded/fertilizing of holes remain outstanding. As an alternative to trash rack placement at the catch basins, a piece of wire mesh with an attached cable connected to a post was placed on each of the four active catch basins at Ley Creek to aid in debris removal.

Issues observed during the October 2009 inspection are as follows:

- A number of animal burrows in the vegetative cover (Example: Figure 4 and Photographs 5 and 7)
- High grass along the service road (Figures 4 and 5 and Photographs 3 and 6)
- Tree growing in the security fence (Figure 2 and Photograph 13)
- Exposed geotextile at CB-3 overflow (Figure 3 and Photograph 9)

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Mrs. Pam Barnett  
January 26, 2010  
Page 2

- Catch basins plugged (CB-1, CB-2, CB-3 and CB-4) (Figures 1, 3 and 5 and Photographs 4, 8, 10 and 14). Debris was removed from the catch basins later the same day of the site inspection (Photographs 15, 16, and 17).

The next OM&M inspection is scheduled to occur in the Summer of 2010.

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,



Maureen S. Markert, P.E.  
Senior Project Engineer

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

Inspection checklist

Date Performed: <b>October 30, 2009</b>			Weather: <b>Overcast 58 F</b>	
Site Name: <b>Ley Creek PCB Dredgings Site</b>			Inspector Name: <b>Edwin B. Rahn</b>	
Site Location: <b>Syracuse, New York</b>			Inspector Signature: <i>Edwin B. Rahn</i>	
Item	Task	Response		Comments
		Yes	No	
<b>Vegetative Cover</b>	<b>Visually inspect surface conditions.</b>			
	1. Areas of settlement?		<b>X</b>	
	2. Areas of erosion?	<b>X</b>		Overflow surface at CB-03. Photograph 9.
	3. Areas where geotextile visible due to erosion?	<b>X</b>		Overflow surface at CB-03. Photograph 9.
	4. Areas of slope instability?		<b>X</b>	
	5. Lack or thinning vegetation?		<b>X</b>	
	6. Presence of burrowing animals?	<b>X</b>		7 holes between CB-3 & CB-4. Photographs 5 and 7.
	7. Areas of damage?		<b>X</b>	
	8. Drainage problems?		<b>X</b>	
	9. Mowing required?	<b>X</b>		Photographs 3 and 6.
<b>Access Road</b>	<b>Visually inspect conditions.</b>			
	1. Areas of settlement?		<b>X</b>	

Inspection checklist

Date Performed: <b>October 30, 2009</b>			Weather: <b>Overcast 58 F</b>	
Site Name: <b>Ley Creek PCB Dredgings Site</b>			Inspector Name: <b>Edwin B. Rahn</b>	
Site Location: <b>Syracuse, New York</b>			Inspector Signature: <i>Edwin B. Rahn</i>	
Item	Task	Response		Comments
		Yes	No	
Access Road	2. Areas of erosion?		<b>X</b>	
	3. Areas rutted or potholes present?		<b>X</b>	
	4. Areas of damage?		<b>X</b>	
Surface Water Drainage	<b>Visually inspect ditches, catch basins, etc.</b>			
	1. Accumulation of debris?	<b>X</b>		At all catch basins. Photographs 4, 8, 10, & 14.
	2. Excessive scouring?		<b>X</b>	
	3. Areas of damage?		<b>X</b>	
Ground Water Wells	<b>Visually inspect conditions.</b>			
	1. Casings secure and locked?	<b>X</b>		
	2. Areas of damage?		<b>X</b>	
Sanitary sewer access paths	<b>Visually inspect conditions.</b>			
	1. Cracks in asphalt?		<b>X</b>	
	2. Manhole covers in place?	<b>X</b>		

Inspection checklist

Date Performed: <b>October 30, 2009</b>			Weather: <b>Overcast 58 F</b>	
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Site Location: <b>Syracuse, New York</b>			Inspector Signature: <i>Edwin B. Rahn</i>	
Item	Task	Response		Comments
		Yes	No	
<b>Sanitary sewer access paths</b>	3. Debris accumulating in access paths?		<b>X</b>	
<b>Physical Site Security</b>	<b>Visually inspect fences and gates</b>			
	1. Signs intact?	<b>X</b>		
	2. Fence breached?		<b>X</b>	
	3. Access gates locked?	<b>X</b>		
	4. Areas of damage?		<b>X</b>	
<b>Note any additional comments.</b>				
Observation of burrowing animal holes seems to be increasing.				
Tree growing in the security fence. Photograph 13.				
The 15-foot width of wetland and the 5-foot width of buffer south of the service road looks well established.				
Bent monitoring well sign (OBG-2) from 2008 has not been corrected.				



Photograph 1: View of CB-05.



Photograph 2: View looking west from East end.



Photograph 3: Eastern section of Service Road.



Photograph 4: View of CB-04. Plugged.



Photograph 5: Animal burrow near utility pole.



Photograph 6: Service Road between CB-03 and CB-04.



Photograph 7: Animal burrows near utility pole.



Photograph 8: View of CB-03. Not overflowing, but plugged.



Photograph 9: View of scoured section of CB-03 overflow channel.



Photograph 10: View of CB-02. Plugged and over grown.



Photograph 11: View looking east from CB-02.



Photograph 12: View looking west from CB-02.



Photograph 13: Tree along fence west of CB-02.



Photograph 14: View of CB-01. Plugged.



Photograph 15: View of CB-02 after cleaning.



Photograph 16: View of CB-03 after cleaning.



Photograph 17: View of CB-04 after cleaning.

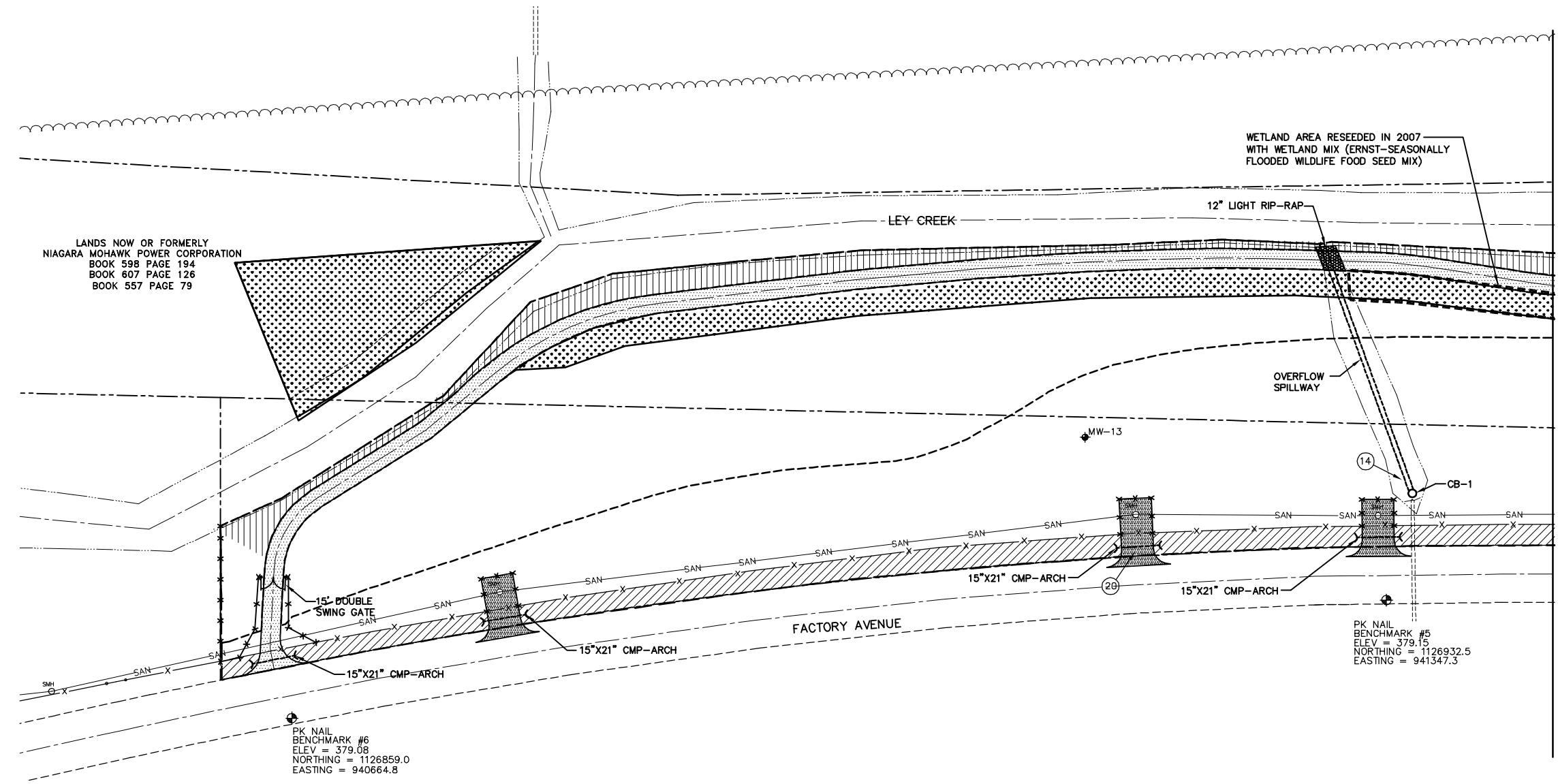


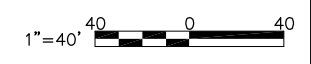
FIGURE 1

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

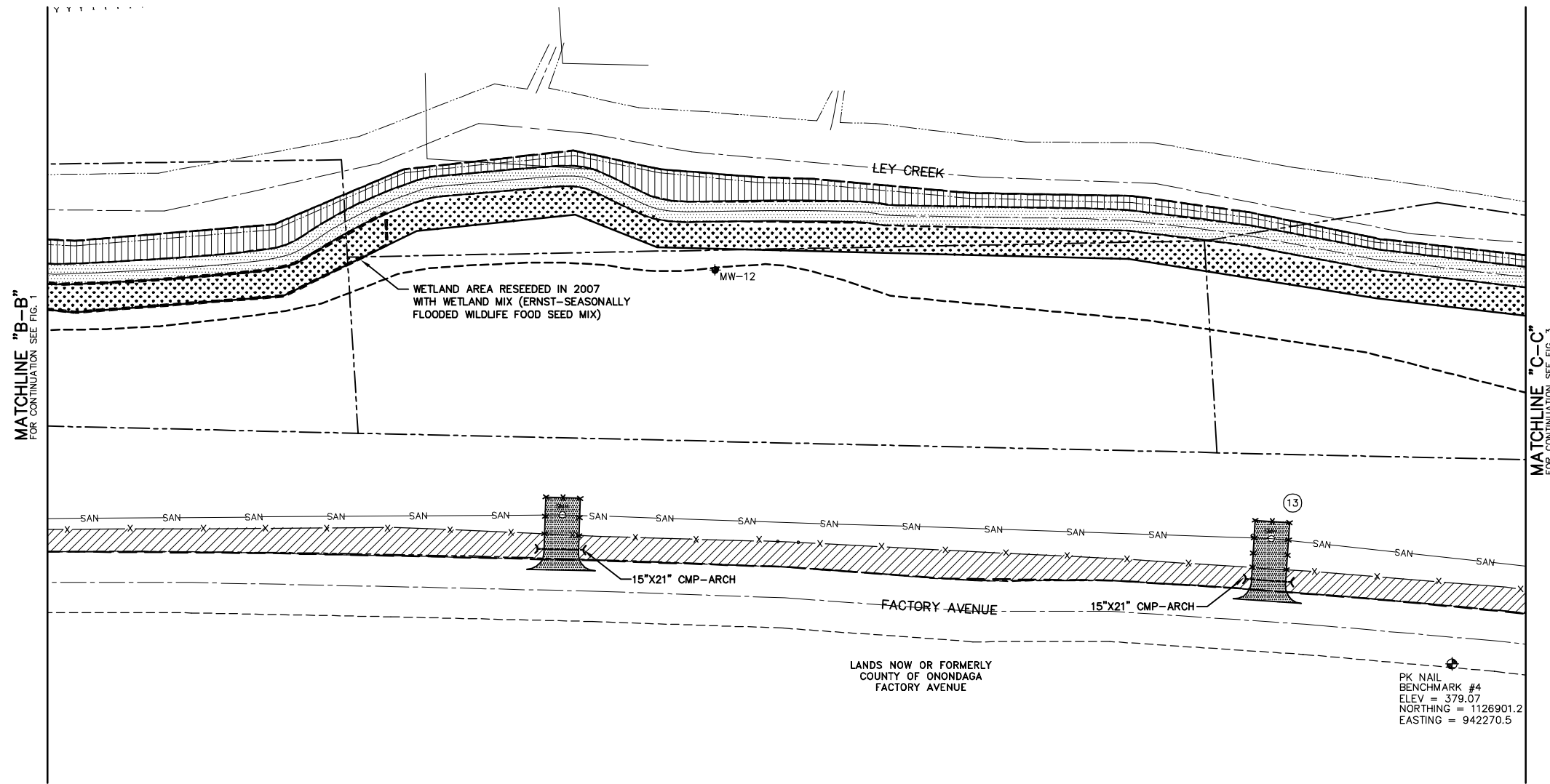
LEY CREEK PCB DREDGINGS SITE  
SYRACUSE, NEW YORK  
SITE REMEDIATION PROJECT

OCTOBER 2009  
OM&M INSPECTION  
PARTIAL SITE PLAN



FILE NO. 14774.45220.0001  
DECEMBER 2009





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

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



FIGURE 2

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  
SYRACUSE, NEW YORK  
SITE REMEDIATION PROJECT

OCTOBER 2009  
OM&M INSPECTION  
PARTIAL SITE PLAN



FILE NO. 14774.45220.002  
DECEMBER 2009



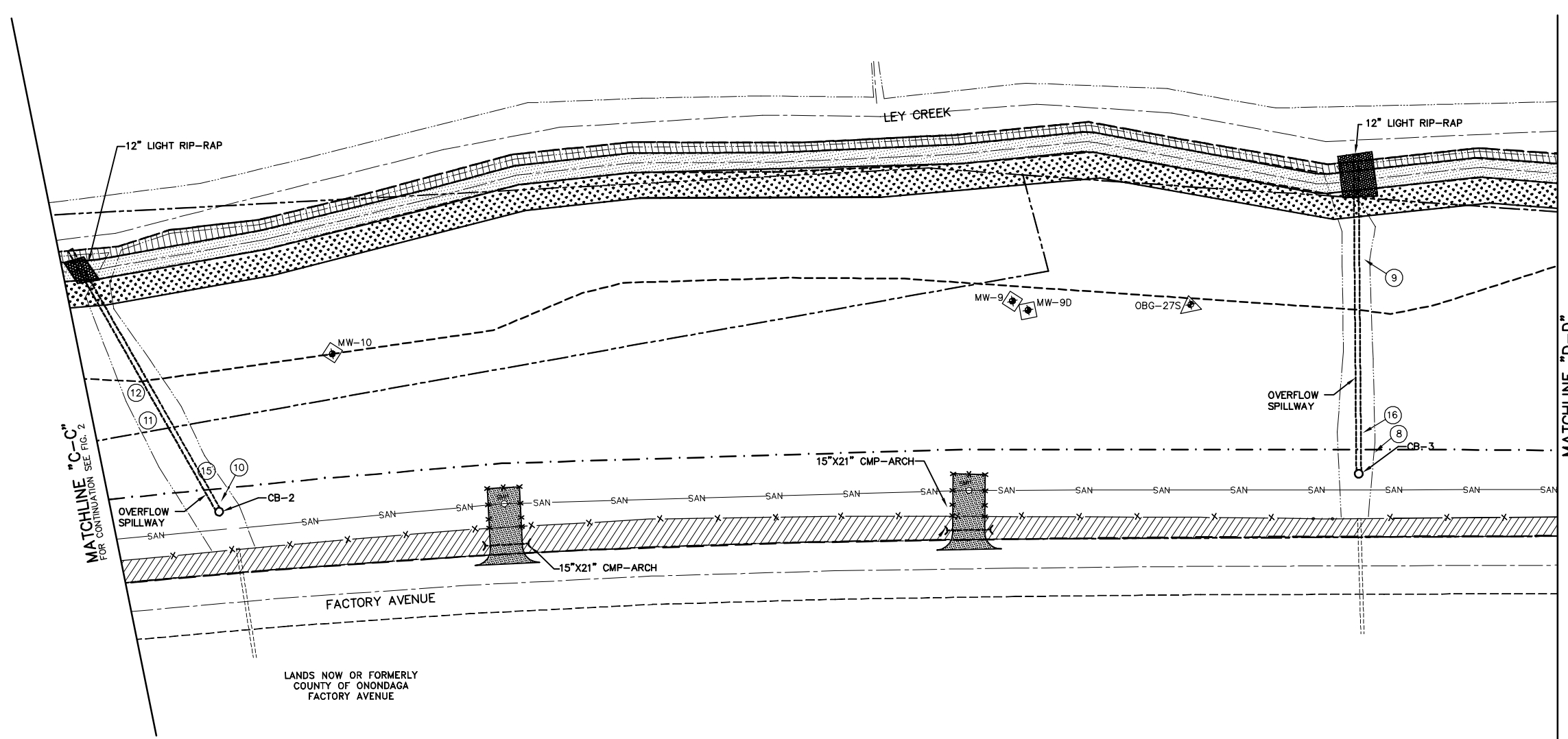


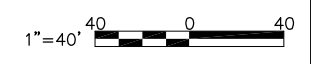
FIGURE 3

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

OCTOBER 2009  
OM&M INSPECTION  
PARTIAL SITE PLAN



FILE NO. 14774.45220.003  
DECEMBER 2009



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

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

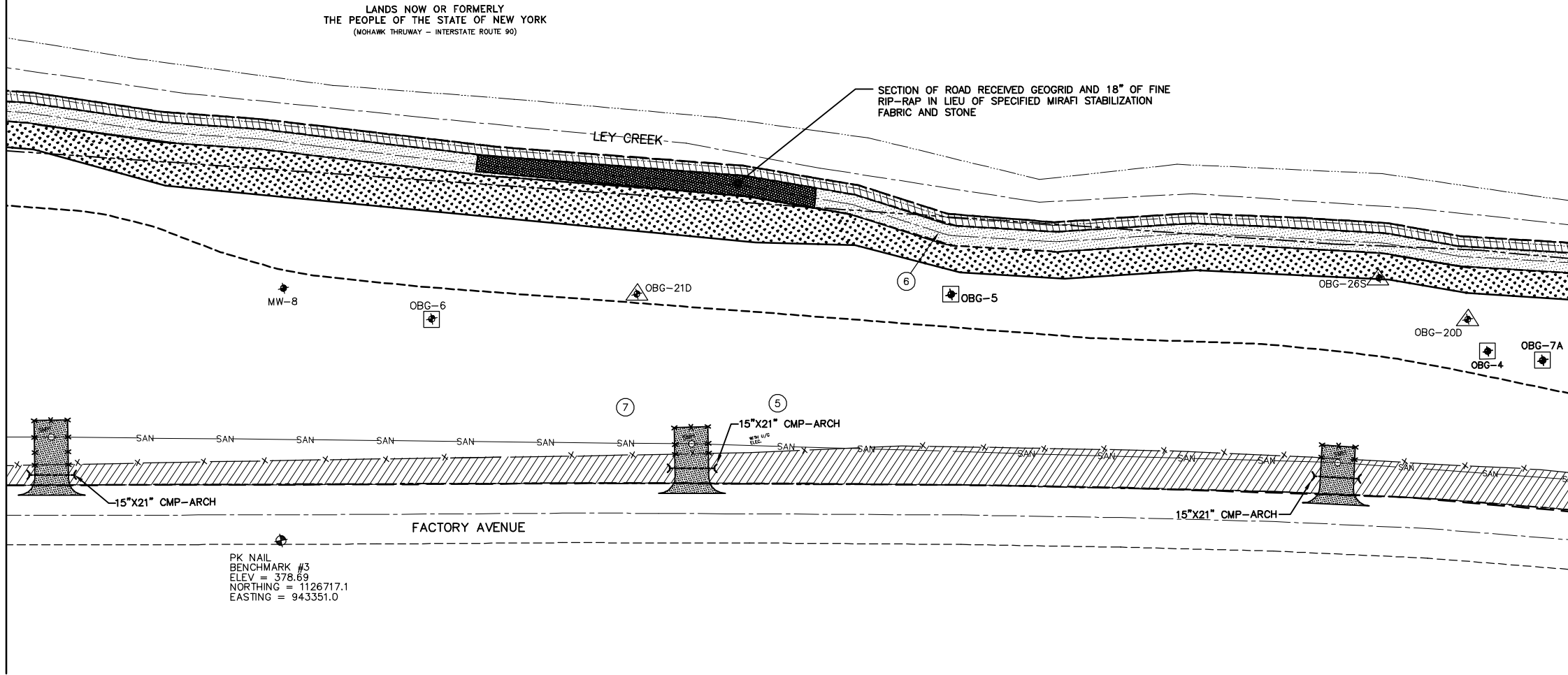


FIGURE 4

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

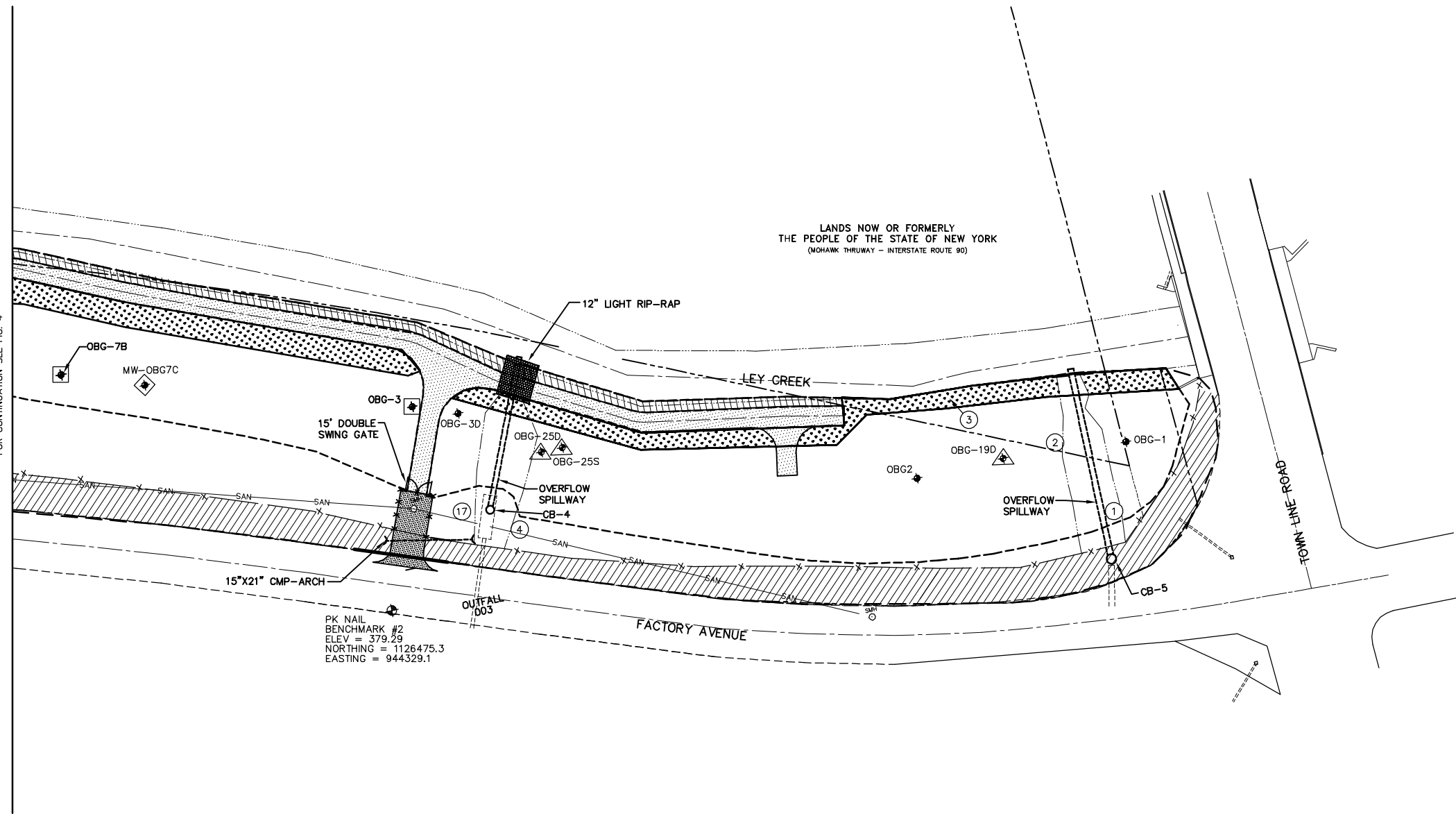
OCTOBER 2009  
OM&M INSPECTION  
PARTIAL SITE PLAN



FILE NO. 14774.45220.004  
DECEMBER 2009



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



LANDS NOW OR FORMERLY  
THE PEOPLE OF THE STATE OF NEW YORK  
(NOHAWK THRUWAY - INTERSTATE ROUTE 90)



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

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

OCTOBER 2009  
OM&M INSPECTION  
PARTIAL SITE PLAN



FILE NO. 14774.45220.005  
DECEMBER 2009



**Attachment 2**

**Status of recommendations**

*Ley Creek PCB Dredgings Site – 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.	To be performed in spring 2010.
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. A piece of wire mesh with an attached cable connected to a post was placed on each of the four active catch basins at Ley Creek to aid in debris removal.
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 the site. 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 2010.
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 2010.
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 2010.
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 2010.

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.

*Douglas M. Crawford*



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

Date: January 26, 2010