STATE OF NEW YORK
DEPARTMENT OF HEALTH
CNY Regional Office , 217 South Salina Street, Syracuse, New York 13202

Antonia C. Novello, MD, MPH, Dr.PH
Commissioner

Dennis P. Whalen
Executive Deputy Commissioner

September 8, 2006

Mr. Richard Mustico
NYS Dept. of Environmental Conservation
Division of Environmental Remediation
625 Broadway
Albany, NY 12233

RE: Preliminary Site Assessment and
Supplemental Site Assessment
North and South Landfills at
Crouse-Hinds Facility
Voluntary Cleanup
Site ID# 734004
C. Syracuse, Onondaga County

Dear Mr. Mustico:

I have reviewed the Preliminary Site Assessment and Supplemental Site Assessment Report for the North and South Landfills located at the Crouse-Hinds Facility site (the report), submitted by Delta Environmental Consultants, Inc. on May 31, 2006. Based upon that review, I generally accept the findings and recommendations presented in the report with the following comments. For your clarity, I have proposed my comments as recommendations for additional sampling activities to help assess potential sources of contaminants and/or remedial alternatives.

Monitoring Well MW-6A
Due to the unknown source of the free phase petroleum product detected in monitoring well MW-6A, and based on the documentation that it is a localized source, further investigative activities around this monitoring well should be conducted to determine the source of these impacts. These activities could include installing additional soil borings, test pits, or even temporary wells.

Deflection of Groundwater
As discussed in the report, the groundwater data indicated that groundwater flow in the shallow aquifer across the north landfill appears to be deflected near the center of the landfill. Although this groundwater deflection "appears to be related to topography changes in the area, which are related to the presence of a fill mound to the north and a drop in thickness of the mound toward the south" (page 4-5), the source of this mounding could be better defined. Investigative activities (e.g., test pits, soil boring, electromagnetic survey) could be conducted so that the source of the mounding might be removed, groundwater flow could be returned to its natural conditions, and the potential impacts to the surrounding areas (e.g., wetlands) could be accurately assessed.

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Groundwater Monitoring

As reported, "the shallow groundwater in areas downgradient of the property is impacted by volatile organic compounds, semi-volatile organic compounds, and metals at concentrations above applicable groundwater standards" (page 4-8). Based on this information, it is recommended that quarterly groundwater sampling be conducted in the shallow aquifer to determine if the plume is migrating offsite or if bioattenuation could be a remedial alternative. Assessing the migration of this groundwater plume will also help determine if there is a future risk to offsite receptors (e.g., animals, humans) who might utilize this water source recreationally or as habitat.

If you have any questions or would like to discuss these comments, please feel free to call me at 315-477-8515.

Sincerely,

Susan B. Welt

Susan Welt
Junior Engineer

cc: G. Litwin/G. Laccetti/M. VanValkenburg
H. Hamel/File
J. Burke - NYSDEC Reg. 7
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