August 9, 2023

Brittany O'Brien-Drake
Assistant Geologist – Bureau D, Section D
New York State Department of Environmental Conservation
625 Broadway, 12th Floor
Albany, New York 12233
Sent via email: Brittany.OBrien-Drake@dec.ny.gov

Re: Work Plan for Geotechnical Investigation
NYSDEC Site Number 3-36-009 – DuPont Stauffer Landfill Site
700 South Street, City of Newburgh, Orange County, New York

Dear Ms. O'Brien-Drake:

On behalf of IV5 Newburgh South Logistics Center LLC (IV5), LaBella Associates, D.P.C. ("LaBella") presents this work plan for a planned geotechnical investigation at the above-listed site ("Site") to support redevelopment planning and design. Geotechnical investigation work will be conducted consistent with the existing Site Management Plan (SMP) and its Excavation Work Plan (EWP) (Appendix C, attached), dated November 2016 and revised June 12, 2017.

Notification and Schedule

The Site owner is planning to utilize Whitestone Associates Engineering & Geology, PLLC (Whitestone) of Warren, New Jersey, to conduct a geotechnical investigation to confirm subsurface and bedrock conditions noted in prior investigations by installing supplemental geotechnical soil borings and test pits. The June 13, 2023, work plan presented a 15-day notice of the planned subsurface soil disturbance at the Site relative to a groundwater elevation study and redevelopment efforts expected to begin in 2023, as required by SMP EWP C-1, and the associated Change of Use Form. This additional work plan for a geotechnical investigation and also supports Site redevelopment efforts with field work anticipated to begin on or after August 28, 2023.

Description of Work to be Performed

Overview: This geotechnical investigation is being conducted to support redevelopment planning and design. Fifteen (15) geotechnical soil borings and eight (8) test pits are planned within proposed building, parking area, and retaining wall footprints. LaBella understands that up to four (4) days of field work are required for this investigation. The attached figure shows the proposed locations for the requested geotechnical investigation.

Preparation: At least three days prior to soil boring and/ or test pit installation, a Whitestone team representative will submit a UDig utility locating request. We understand that no underground utilities are present in the proposed work areas.

CAMP Monitoring: Although the proposed geotechnical investigation is outside the North Landfill, since the borings and/ or test pits are planned to extend to a maximum depth of 20 feet below ground surface (ft bgs) and into groundwater, LaBella will provide CAMP monitoring during geotechnical investigation activities. Three CAMP stations will be set up to collect readings for volatile organic compounds (VOCs) using a photoionization detector (PID), and particulates using a DustTrak particulate meter. The stations will be positioned in upwind, work zone, and downwind locations

relative to the active geotechnical investigation area. Exceedances of the action levels in the CAMP will be reported to NYSDEC and NYSDOH Project Managers consistent with SMP EWP C-13.

Geotechnical Investigation Activities: A Whitestone engineer/geologist will supervise drilling contractor during a geotechnical investigation at accessible portions of the subject Site. A LaBella field scientist will observe the boring/test pit installations, and screen recovered soils for visual, olfactory and PID consistent with SMP EWP C-2. Soil will be stockpiled and placed on and under plastic near the source borehole and/ or test pit. After completion of each boring/test pit, soils will be returned to the borehole/excavation in the reverse order they were removed. If a boring or test pit is advanced below the demarcation layer, that soil will be segregated, placed first back into subsurface, and separated from the upper layer by a demarcation layer (i.e., orange construction fencing).

- We understand that the planned boring/test pit locations are accessible without removal of trees. Vegetation clearing (i.e., high grass and weeds) will be completed by Site owner during the week of August 14, 2023 to access the test pit and boring locations.

- On or after August 28, 2023, fifteen (15) overburden geotechnical soil borings are to be advanced using an ATV-mounted drill rig, with seven (7) borings located within the proposed building footprint, three (3) borings within the proposed retaining wall footprint, and five (5) within proposed parking area footprints. Whitestone proposes to advance these borings to an estimated maximum depth of 20-feet bgs to the bedrock surface. Eight (8) test pits will be advanced using a mid-sized track-mounted excavator. Test pits will be advanced to a maximum depth of 12-feet bgs. A Whitestone PE will prepare a *Report of Geotechnical Investigation* that includes recommendations for foundation types(s), construction considerations and additional investigation, if warranted.

- Environmental Conditions Expected to be Encountered: Based on prior remedial activities that removed soil to either bedrock or until soil met 6 NYCRR Part 375 Commercial Use Soil Cleanup Objectives (CUSCOs), it is expected that soil encountered during the soil boring and test pit installations would not exceed the CUSCOs. After the remedial work was completed, PFAS were identified on and upgradient of the Site, as such saturated soil and groundwater encountered may contain PFAS.

- Dust Control Plan: Consistent with SMP EWP C-14, the Whitestone team will implement or be prepared to use water for dust suppression as necessary.

- The installation of soil borings and test pits will not warrant the need for cover system restoration or backfill from off-Site sources (SMP EWP C-9 and C10). It is anticipated that these borings and test pits will be backfilled with source soil.

Stockpiling and Reuse: Efforts will be taken to minimize generation of soil and rock cuttings. Consistent with NYSDEC's May 8, 2023 letter and confirmed via phone call between us, soil removed from beneath former remedial excavation limits can be reused onsite beneath a soil cover system and demarcation layer without testing. It must not be reused onsite as soil cover material. We request permission to return soil boring cuttings and soil generated during test pits excavations to the source location. Remaining cuttings generated during borings will be stockpiled on and under anchored plastic so that it is not co-mingled with clean backfill that was brought to the Site as part of prior remedial efforts. As the Site does not have a facility to maintain logbooks, LaBella's recorded field observation results and CAMP readings will be kept in LaBella's project file, and records will be available for review by NYSDEC.

Investigation Derived Waste (IDW): The Whitestone team will assemble and use a decontamination pad, and decontamination fluids will be drummed as IDW and staged on-Site. Liquids generated during drilling will also be drummed. Drums will be placed in an area that appears to have accessibility for future removal from the Site for disposal and in an area that was previously remediated and where clean backfill was used (see area on provided image). LaBella will collect one sample of IDW liquid for laboratory analysis of typical waste characterization criteria. Should the disposal facility require additional analyses, those will be performed as well.

Material Load Out, and Transport/Disposal Off-Site: The waste characterization results will be used to identify a disposal facility that will accept the waste. The preferred disposal facility has not been identified been identified but will be provided to NYSDEC for approval prior to waste being removed from the Site. As IDW will be staged where clean backfill was previously placed (see provided image above), a truck wash is not expected to be needed. LaBella will coordinate removal of IDW, assess vehicles leaving the Site, inspect for evidence of off-Site soil tracking, and clean as needed. IDW will be handled as solid waste and transported in appropriately loaded vehicles that meet applicable transportation requirements (see SMP EWP C-4 and C-5). The anticipated truck access route into the Site is also shown on the image above and IDW is expected to be handled in one trip (if liquid only) to two trips (if soil and liquid waste need off-Site disposal).

Contingency Plan– Consistent with SMP EWP C-12, in the event that previously unidentified contaminant sources are encountered, LaBella will assess the encountered condition/feature and contact the NYSDEC Case Manager to report this condition.

Deliverable– LaBella will submit a letter report to NYSDEC documenting the CAMP readings and field screening observations. As the geotechnical investigation findings will be used as part of building design, they are not expected to be needed by NYSDEC. Updated redevelopment plans that incorporate the results of the geotechnical report will be provided to NYSDEC.

If you have questions please do not hesitate to contact me at 518-260-1811.

Respectfully submitted,
LABELLA ASSOCIATES, D.P.C.

Arlette St. Romain
Brownfields Program Manager

Attachments:
Figure 1 – Proposed Geotechnical Soil Boring and Test Pit Locations

CC: Murphy, Michael C (DEC) <michael.murphy1@dec.ny.gov>;
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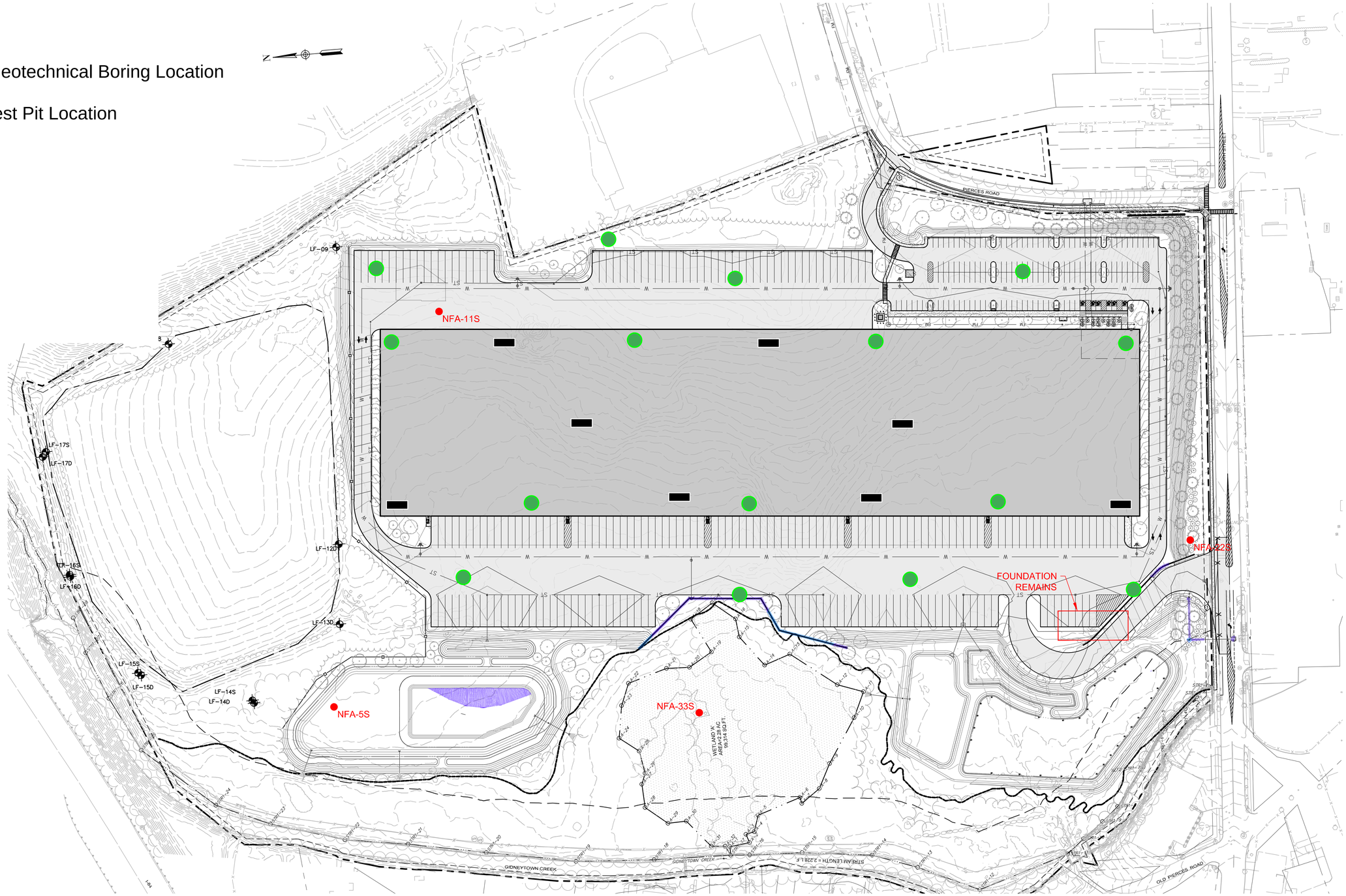
Figure

Proposed Geotechnical Boring Location

Proposed Test Pit Location



REVISED 04/07/2023

FOR REVIEW - NOT FOR CONSTRUCTION

0 1 2 3
ORIGINAL SCALE IN INCHES

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rev.	date	description

NEWBURGH WAREHOUSE

Figure: Proposed Geotechnical Soil Boring and Test Pit Locations

CITY OF NEWBURGH, ORANGE COUNTY, NEW YORK

designed CLD/DCP	checked WJK
date 9/24/21	scale 1"=80'
project no. 32142.00	
sheet no. **FIG 8**	

Drawing Name: B:\GLOBAL\Legacy\Chazen\Projects\32100-32199\32142.00 - National Realty Newburgh Warehouse\DWG\ZZ_C001_32142-00_CUT-FILL-EXC.dwg
Xref's Attached: XTB-24X36_32142-00; XBASE_GIS_32142-00; XLAYOUT_32142-00; XBASE_AS-BUILT-CLIENT_32142-00; XBASE-ENG_32142-00_CHAZEN_rev1; XCUTFILL_EXCAVATION
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