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Deconstruction Work Plan

DECONSTRUCTION OF DEFENSE FUEL SUPPORT POINT
VERONA, NEW YORK



Prepared for:

U.S. AIR FORCE

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TASK ORDER NO.: FA890325F0122

DECONSTRUCTION WORK PLAN

Defense Fuel Support Point
Verona, New York

Deconstruction of Defense Fuel Support Point

AFCEC Contract No. FA890317D0038
Task Order No. FA890325F0122

Prepared for:

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1.0 Introduction

CDM/CAPE, a Joint Venture (CDM Smith) has prepared this Deconstruction Work Plan (DWP) for the U.S. Air Force Civil Engineer Center (AFCEC) for the deconstruction of the Defense Fuel Support Point (DFSP) Verona, New York (the Site).

1.1 Project Details

Scope details are provided in the Statement of Work provided by AFCEC dated January 2025. This Task Order (TO) was provided under the Worldwide Engineering and Construction (WEC) East Regional Engineering and Construction – Issue for Construction (IFC) Contract.

- Contract Number: FA890317D0038, Task Order: FA890325F0122
- Project Name: Complete Demolition of DFSP Verona, New York (herein after referred to as the project)

1.2 List of Deconstruction Project Work Plans

The following work plans have been developed for the Project:

- Waste Management Plan (WMP)
 - Impacted Soil Management Plan
 - Soil Re-Use Plan
- Environmental Protection Plan (EPP)
 - Dirt and Dust Control Plan
 - Emissions Control Plan / Clean Air Compliance
 - Onsite Hazardous Waste Management Plan
 - Spill and Discharge Control Plan / Prevention of Releases to the Environment
 - Stormwater Pollution Prevention Plan
- Contractor Quality Control Plan (CQCP)
 - Quality System Plan
- Sampling and Analysis Work Plan (SAP)
 - Field Sampling Plan (FSP)
 - Quality Assurance Project Plan (QAPP)
- Deconstruction Work Plan (DWP)
- Accident Prevention Plan / Site Safety and Health Plan (APP/SSHP)
 - Emergency Response Plan

- Traffic Control Plan
- Asbestos Abatement Plan
- Lead Compliance Plan
- Hazardous Material Plan

1.3 The Deconstruction Work Plan (DWP)

The purpose of the DWP (the Plan) is to present a detailed approach of the deconstruction project. The primary objective of the project is to safely deconstruct the former DFSP Verona in New York.

The DWP aims to provide guidelines on the deconstruction process including schedule, excavation, waste material storage, transport and disposal, decontamination, and spill prevention and control.

The DWP is organized as follows:

- **Section 1** – Introduction
- **Section 2** – Project Personnel and Responsibilities
- **Section 3** – Schedule and Permitting
- **Section 4** – Material Handling Procedures
- **Section 5** – Site Work
- **Section 6** – Quality Control/Quality Assurance
- **Section 7** – Spill and Discharge Control Practices

2.0 Project Personnel and Responsibilities

2.1 Key Project Personnel

Key project personnel responsible for the deconstruction project are listed in **Table 1**. A Site Contact List is presented in **Appendix A**.

Table 1 Project Personnel for the Deconstruction Project

CDM Smith Staff	Role	Responsibilities
Nicole Barry / Rene Larson	Project Manager	<ul style="list-style-type: none"> Accountable for overall construction contract adherence Supervises implementation of the programs
Bryan Benoit	Site Superintendent	<ul style="list-style-type: none"> Coordinates with Project Manager for execution of project Coordinates with subcontractors Completes Daily Construction Inspection Reports
Bryan Benoit	Site Safety Health Officer (SSHO)	<ul style="list-style-type: none"> Responsible for managing, implementing, and enforcing the Health and Safety Plan in accordance with the APP/SSHP and EM 385-1-1 Provides periodic oversight, audits, incident investigations, safety inspections, training, and review of subcontractor safety programs Participates in monthly safety meetings and monitors the effectiveness of the safety program
Eric Fickbohm	Alternate Site Safety Health Officer (SSHO)	<ul style="list-style-type: none"> Responsible for managing, implementing, and enforcing the Health and Safety Plan in accordance with the APP/SSHP and EM 385-1-1 Provides periodic oversight, audits, incident investigations, safety inspections, training, review subcontractor safety programs Participates in monthly safety meetings and monitors the effectiveness of the safety program
Ken Meyer	Corporate Health & Safety Director (CHSD)	<ul style="list-style-type: none"> Ultimate responsibility for implementing safety policies and procedures on the project.
Jeff Mullen	Quality Control System Manager (CQSM)	<ul style="list-style-type: none"> Accountable for overall quality control for construction Maintains project records and required documentation Responsible for three-phase quality system
Kelly Roach	Alternate Quality Control System Manager (CQSM)	<ul style="list-style-type: none"> Accountable for overall quality control for construction Responsible for three-phase quality system
Amy Picunas	Environmental Professional/Manager	<ul style="list-style-type: none"> Ensures compliance with federal, state, and local, requirements Oversees implementation of Environmental Protection and Waste Management Plans Coordinate environmental sampling in compliance with the SAP Ensure compliance with environmental permits including NY SPDES Permit

CDM Smith Staff	Role	Responsibilities
Jeff Mullen	Environmental Technician	<ul style="list-style-type: none"> ▪ Provides onsite oversight of pipeline demo work for release conditions by visual observation of soil, field screening of soil ▪ Perform periodic environmental sample collection for laboratory analysis in accordance with the SAP ▪ Maintains environmental records and required documentation

2.2 Qualified and Competent Person(s)

CDM Smith has identified individual Qualified Persons (QP) for specific tasks under the project scope of work. Per the Project Specification Index (EA Engineering, P.C. and its Affiliate EA Science and Technology, February 2024), the QP is a person who, by possession of a recognized degree, certificate, professional standing or extensive training and experience, has successfully demonstrated their ability to solve or resolve problems related to the subject matter, the work, or the project.

- QP, General Construction – Ken Meyer (CHSD)
- QP, Asbestos Abatement – Jason Mittelstaedt (Select Demolition Services LLC.)

CDM Smith has also identified individual Competent Persons (CP) for specific tasks under the project scope if/when the QP will not be onsite full-time. Per the Project Specification Index (EA Engineering, P.C. and its Affiliate EA Science and Technology, February 2024), the CP is a person who can identify, evaluate, and address existing and predictable hazards at the Site that are dangerous to personnel, and who has authorization to take prompt corrective measures to remove or mitigate these hazards.

- CP, Excavation/Trenching - Bryan Benoit (Superintendent/SSHO)
- CP, Rigging – Bryan Benoit (Superintendent/SSHO)
- CP, Health Hazard Recognition – Bryan Benoit (Superintendent/SSHO)
- CP, Trainer – Ken Meyer (CHSD) or alternate nominated by the QP.
- CP, Asbestos/Lead – Jason Mittelstaedt (Select Demo Services LLC.)

CPs/QPs are subject to change. Activities at the Site will only be performed when the appropriate CP is onsite.

Procedures for safe conduct of the project work in accordance with EM 385-1-1 and personnel qualifications have been provided under separate cover in the APP/SSHP, WMP, and Asbestos Abatement Plan.

2.3 Subcontractors/Suppliers

Potential subcontractors/suppliers and the intended scope they will perform on the deconstruction project includes the following:

- Select Demo Services, LLC. (Environmental, Demolition, and Abatement Subcontractor)

- Trident Environmental Group (Pipe Pigging)
- GPRS (Utility Locating)
- Nothnagle Drilling, Inc. (Drilling/Well Abandonment & Installation)
- Lu Engineering (Asbestos Private Qualified Person (PQP))
- Grass Assassins Landscaping (Hydroseeding)
- ALS Environmental (Sample Analysis)
- Delta, Engineers, Architects & Surveyors, DPC (Land Surveyor)
- Goulet Trucking (POL Soil Disposal Transportation)
- Oneida-Herkimer Solid Waste Authority (POL Soil Disposal)
- Strategic Environmental Services (PFAS Soil Disposal Transportation)
- Republic Services (PFAS Soil Disposal)
- Trident Environmental Group (POL Water Transportation and Disposal)
- Environmental Standards (Data Validation)
- Atlantic Testing Laboratories (Geotechnical Testing)
- Huen Electrical Construction and Engineering Services (Temporary Electrical)

Subcontractor certifications/licenses will be provided under a separate cover prior to work commencement as required by Project Specification Index (EA Engineering, 2024).



3.0 Schedule and Permitting

3.1 Deconstruction Project Schedule

The detailed baseline Project Schedule was provided under a separate cover and will be updated and provided to AFCEC on a monthly basis.

Site work will not commence until Notice to Proceed is received from the Contracting Officer (CO).

3.2 Permitting

The following permits will be obtained/completed by CDM Smith:

- Asbestos Abatement permit – New York State Department of Labor, Division of Safety and Health Asbestos Project Notification
- SPDES General Permit for Stormwater Discharges from Construction Activity (SPDES Permit)- New York State Department of Environmental Conservation (NYSDEC)
- Demolition Permit – Town of Verona Codes Enforcement Office

Permits will be provided under a separate submittal cover. All permits will be obtained and active prior to commencing the associated construction activities.

4.0 Material Handling Procedures

4.1 Required Equipment

A list of major equipment anticipated to be utilized in the execution of the Project is provided below.

- Excavator (CAT 336 or Equivalent)
- Excavator (CAT 349 or Equivalent)
- Dump Truck (12-14 CY Capacity On-Road 10-Wheel Dump Trucks)
- Front End Loader (CAT 980 or Equivalent)
- Track or Wheeled Skid Steer (CAT 266D or Equivalent)

4.2 Material Delivery, Storage & Handling

4.2.1 Materials

Materials delivered to the site will be new, undamaged, and accompanied by certified test reports. A list of materials and their specifications are provided in **Table 2**. Material will be provided in accordance with the associated Project Specification Index (EA Engineering, 2024). Haul routes around the Site have been included in the Site Layout, **Figure 1**.

Table 2 Materials List

Material (If needed)	Specification Section
Monitoring Well Abandonment Product	Section 01 20 00
Erosion Control Material	Section 01 57 19
Topsoil	Section 31 00 00
Common Fill	Section 31 00 00
Soil Conditioners	Section 32 92 19
Fertilizers	Section 32 92 19
Seed Mixes	Section 32 92 19
Erosion Control Blanket	Section 32 92 19

Product data, manufacturer’s certifications of quality, and mill certificates for materials will be provided as listed in the Submittal Register. Submittals will be reviewed by CDM Smith prior to submittal for approval.

4.2.2 Materials Tests

Material, field, and outside organization testing is outlined in the CQCP provided under a separate cover. Material testing will be required for imported fill and topsoil as necessary. A Request to Import Soil/Fill form will be submitted to NYSDEC for review and approval prior to the import of soil or fill material. Environmental analytical testing and geotechnical testing will be completed as described in the CQCP

and Project Specification Index (EA Engineering, 2024). Environmental testing will be performed in accordance with the SAP, provided under separate cover. Environmental results for imported material will be compared with the New York State Department of Environmental Conservation (NYSDEC), DER-10 Technical Guidance for Site Investigation and Remediation (May 2010) to evaluate if acceptable for use onsite. PFAS sampling of imported fill will be completed in accordance with the April 2023 NYSDEC Sampling, Analysis, and Assessment of PFAS Guidance Document (NYSDEC 2023). In accordance with the response to Request for Information (RFI) 001, the imported soil shall comply with the January 2025 Department of Defense (DoD) Office of the Assistant Secretary of Defense Memorandum. Concentrations of PFAS in imported soil will be compared to Attachment 1, DoD Screening Levels for Residential Soil, to evaluate if acceptable for use onsite. Environmental testing results, geotechnical testing results, and weight slips will be included in the Project Closeout Report.

4.2.3 Material Delivery

Only approved materials will be delivered to the Site. Product data will be submitted at least 10 working days prior to procurement. Storage and staging areas will be positioned to ensure easy access for delivery and removal of materials. Imported material will be stockpiled onsite and covered in 6-mil polyethylene sheeting as needed.

4.2.4 Material Storage and Handling

Separate staging/laydown areas will be constructed for new material storage, staging of debris for disposal or recycling, and stockpiling of soils for sampling of contaminated soils prior to disposal as shown in **Figure 1**. These areas will accommodate stored material and provide enough room for dismantled material handling and cutting before disposal.

Designated recyclable material storage areas will be clearly marked and kept clean throughout the Project.

4.2.5 Waste and Contaminated Material Storage

The WMP fully details waste management including storage and handling procedures. CDM Smith will maximize the available spaces identified as staging areas for laydown areas as shown in **Figure 1** and as designated in the WMP.

Spill and discharge control procedures are discussed in **Section 7**.



5.0 Site Work

It is noted that as of April 2026, some deconstruction activities described below were previously completed between May – December 2025. Timeline and schedule constraints on workplan submittal and review resulted in the text below, for some activities, to be described as occurring in the future. However, the following environmental related tasks have already been completed:

- PFAS Pre-Characterization Sampling
- Site Preparation
 - Pre-Construction Visual Photo Survey
 - Utility Locating
 - Site Layout and Surveying
 - Erosion and Sediment Control
 - Clearing and Grubbing
 - Temporary Facilities and Utilities
- Deconstruction
 - Removal of hazardous materials
 - Asbestos
 - Lead Based Paint
 - Universal Waste
 - Deconstruction of all aboveground structures, excluding building slabs
 - Petroleum Operations Building
 - Generator Building
 - Fire Suppression Building and associated Foam Fire System
 - Storage Building
 - Maintenance Building
 - Electrical Distribution Building
 - Pit Building
 - Automatic Tank Gauging Building
 - Truck Fill Stand and Canopy
 - Deconstruction of jet fuel Tanks No. 1, 2, and 3, which were previously closed-in-place in August 2012 (Tank No. 1) and in May 2014 (Tanks No. 2 and 3)
 - Deconstruction of all other aboveground tanks

- Tank No. 5A
- Tank No. 6
- Tank No. 111A
- Tank No. 112B
- Tank No. 114B
- Tank No. 114C
- Tank No. 117
- Tank No. 118
- Tank No. 122
- Deconstruction of all aboveground utilities
 - Utility connections to aboveground structures
 - Fuel Pipelines
 - Exterior Area Lights
 - Overhead Electrical Lines
 - Telephone Poles
 - Fire Hydrants
 - Fire Alarm System

All other described tasks will commence in May 2026. Ground intrusive work (e.g., soil excavation, stockpiling of excavated soil, and excavated soil reuse or off-site disposal) will only occur after NYSDEC approval of this Deconstruction Work Plan and the Sampling and Analysis Plan.

5.1 Pre-Construction and Site Preparations

Prior to construction, CDM Smith will obtain the required permits listed in **Section 3.2** and execute all access agreements as outlined below.

5.1.1 Structural Survey

An engineering survey by a Registered Professional Engineer (RPE) licensed in the state of New York has been performed in accordance with EM 385-1-1 Section 17 of all site structures proposed for deconstruction to determine the structure layout, the condition of the framing, floors, walls, the possibility of unplanned collapse of any portion of the structure and the existence of other potential or real demolition hazards. The Engineering Structural Survey Report will be provided under a separate cover.

5.1.2 Pre-Characterization

The pre-characterization of soil will be at the locations noted on **Figure 2**. Soil sampling frequency, methodology, depths, and proposed locations of PFAS samples are provided in the SAP provided under

separate cover. PFAS samples will be taken prior to excavation work. The analytical data will be compared to the DoD Screening Levels for Residential Soils. All disturbed soils which meet the criteria will be reused on-site as backfill. All disturbed soils which exceed the criteria will be properly disposed of off-site. Waste characterization samples will be collected only for soil designated for off-site disposal.

5.1.3 Access Agreements and Third-Party Coordination

Buckeye Pipeline, L.P.

Site Access License Agreement

CDM Smith is responsible for executing the pre-negotiated Site Access License Agreement with Buckeye Pipeline, L.P (Buckeye). The agreement has been reviewed in its entirety, and all requirements will be complied with including but not limited to the following:

- Pay \$11,054.60 On-time Access Agreement Fee
- Provide proper notice prior to accessing property
 - 14 calendar days' notice to Authorized Representative
 - 2 workdays' notice to On-Site Inspector
- Conduct a physical inspection of property that will include digital documentation of the current condition of those portions of the land where work is anticipated to be performed and other impacted areas.
- Buckeye inspector will be present during on work at the Buckeye property.
- Perform all work between the hours of 7:00 am to 5:00 pm, Monday thru Friday, excluding holidays (the **"Work Hours"**) from April 15th through November 15th.
- Restoration of all disturbed areas.
- Dust monitoring will be conducted in accordance with the procedures described in the EPP, submitted separately.

CSX Rail Line

CDM Smith will review the anticipated means and methods and coordinate with CSX for the removal of the outfall near the rail line.

5.1.4 Notice to Proceed

Notice to Proceed (NTP) will be requested after all major work plans are approved.

5.1.5 Site Preparations

Intended work hours are Monday through Friday from 0700 to 1700 hrs. If needed, work outside of these hours will be requested for approval.

The site layout plan including traffic control and haul routes are shown on the Site Layout in **Figure 1**.

A Community Air Monitoring Program (CAMP) consistent with DER-10 requirements is presented in **Appendix B** and will be followed at the site. A Dirt and Dust Control Plan has been provided under a

separate cover as part of the EPP for controlling dirt, debris, and dust on existing and access roadways. Some key measures from the Dirt and Dust Control Plan to reduce dirt, dust, and debris include:

- Visible dust will be reported to the Site Superintendent.
- Access roads will be watered as necessary with a water hose or water truck.
- Loaded trucks will be covered with tarp.
- Stockpiled soil and materials will be covered with polyethylene sheeting when not in use, including at the end of the workday.
- A Site speed limit of 5 mph for access roads to minimize fugitive dust will be enforced.

CDM Smith will be responsible for cleaning along the haul routes, public roadways and implementing measures to reduce dirt, dust, and debris from site activities. A stabilized construction entrance will be constructed to mitigate the tracking of sediment off the site.

No active train track monitoring or protection is included in the scope of the Project. No traffic control flaggers and/or police details are required for the scope of the Project.

Temporary construction fencing will be installed as needed during the deconstruction activities to prevent unauthorized access to the project site.

Pre-Deconstruction Visual Photo Survey

Before any onsite construction, CDM Smith will perform a pre-deconstruction survey of the project sites in accordance with the Project Specification Index (EA Engineering, 2024). Areas to be disturbed and access roadways will be photographed to document existing environmental conditions in and adjacent to Sites.

Utility Locating

As required by the State of New York, CDM Smith will contact New York 811 prior to site work by calling 811, the national call before you dig number.

Utility locating will also be performed by a private locating company after site access has been granted. The locating will be performed utilizing multiple methods including underground scanning with ground penetrating radar (GPR) antenna, electromagnetic pipe locator, and traceable rodder depending on accessibility. A more intensive survey may be completed in areas with unknown lines or line depth/location to determine the utility location. This may include the removal of surface coverings and obstructions that interfere with the survey. If known line depth cannot be determined with the GPR, alternate methods (i.e. vacuum excavation) must be approved by AFCEC before proceeding.

Site Layout and Survey

Prior to conducting any project surveys, CDM Smith will complete an assessment of survey control points on the site. All control surveys for elevation will be plus or minus 0.01 ft and for horizontal, angles will be to the nearest 20 seconds plus or minus 10 seconds and measured distances will be to plus or minus 0.01 ft. The surveyor will stake or flag the limits of disturbance prior to the start of land disturbance activities.

Survey requirements will be completed as outlined in Specification Section 01 71 23 in the Project Specification Index (EA Engineering, 2024). All surveys will be performed by a registered land surveyor. The land surveyor qualifications have been provided under a separate submittal cover.

Erosion and Sediment Control

Soil erosion and sediment control practices will be installed by CDM Smith per the EPP, including an attached Erosion and Sediment Control Plan, provided under a separate cover. Erosion control measures will be implemented on the perimeter of the project site (downgradient of the work areas) within the limit of disturbance, around stockpile areas, and other locations and maintained for the Project.

During deconstruction, all soil erosion and sediment controls will be inspected by CDM Smith in accordance with the requirements of the Stormwater Pollution Prevention Plan (SWPPP).

Clearing and Grubbing

Clearing and grubbing will consist of the limited clearing of brush and small trees less than two inches in diameter to facilitate the removal of existing infrastructure and facilities within the Limits of Disturbance (LOD). Brush generated from clearing activities will be chipped and re-used in the restoration of the site.

Temporary Facilities and Utilities

CDM Smith will have three temporary offices for CDM Smith, Subcontractor personnel, and the Title II government representative. CDM Smith anticipates using the existing paved area shown in **Figure 1** for the temporary office facilities. Furnishings will be provided as required and as necessary to facilitate normal working conditions. An electric and internet connection will serve each trailer.

Portable toilets with hand sanitizer will be furnished with weekly cleaning services. Location of toilets may change based on work location.

Staging/Laydown Areas

There will be multiple staging established around the site for the staging of excavated soils and import materials as needed. See **Figure 1** for planned staging and stockpile areas. Erosion control measures will be installed around the perimeter of the staging areas as described in the EPP provided under a separate cover. Potential contaminated soil will be stockpiled on and covered with 6 mil poly sheeting for sampling and analysis. The piles will be covered when not in use and the covering secured.

5.2 Deconstruction

Before deconstruction, CDM Smith will prepare the work area to facilitate logistics and reduce erosion and sediment migration. CDM Smith has performed an assessment of the project and determined only personnel interacting with contaminated below-ground materials will be required to have 40-hour training.

In addition to visible dust monitoring, CDM Smith will implement a CAMP in accordance with the requirements summarized in Appendix B. Continuous particulate monitoring is required at upwind and downwind particulate monitoring stations during working hours, including during intrusive ground disturbing activities and the demolition of contaminated and non-contaminated structures. Reporting requirements are discussed in Section 5.5.3.

All personnel onsite will participate in a dust control training program. This training program will review the potential sources of dust, individual responsibilities, and actions for controlling dust. The training will emphasize the importance of dust control to the overall success of the construction activities and familiarize site personnel with the air monitoring requirements and appropriate dust control procedures to minimize dust.

The asbestos abatement crew and Abatement Supervisor will be on site during all asbestos removal and/or handling activities. A detailed Asbestos Abatement Plan has been provided under a separate cover and has been approved by the asbestos Private Qualified Person (PQP). The PQP will conduct initial site-specific training, collect area air samples, and be onsite as detailed in the Asbestos Abatement Plan.

During deconstruction activities, the field screening and sampling procedures described in **Section 5.3** will be followed.

5.2.1 CLIN 001 Facility No. 1 Deconstruction of the Petroleum Operations Building (Main Building)

Prior to deconstruction, hazardous material identified by HSE Consulting Services, LLC. will be removed by licensed professionals. Hazardous material associated with the Petroleum Operation Building (Main Building) are inclusive of the following:

- Asbestos – Laboratory Counter Tops and Vent Pipe Sealant
- Lead Based Paint – Based on the lead sample results, no specialized deconstruction procedures are required for lead based painted material.
- Polychlorinated Biphenyls (PCBs) – Sample results were below regulated concentrations. No specialized deconstruction procedures are required for PCBs.
- Universal Waste – Waste Fluorescent Lamps and Mercury Containing Equipment.

Pre-Demolition

Prior to the start of any abatement activities, all utilities will be cut, capped, and made safe. Any existing oils or fluids will be drained and collected prior to abatement. Universal wastes will be collected, properly packaged and moved to the waste storage area for proper disposal. Further details are outlined in the Asbestos Abatement Plan provided under a separate cover.

Each area will be visually inspected to reaffirm they are free of any possible hazardous material, and all the necessary environmental measures are in place. All resulting debris will be removed, properly transported, and disposed of as per all applicable local, state, and federal regulations.

Prior to demolition, CDM Smith will confirm that all utilities are cut, capped, and made safe. Limited interior demolition may be performed by equipment, when possible, to separate the various waste streams. In areas where this equipment is not able to be used, laborers with hand and power tools be utilized to remove items deemed necessary, otherwise all material separation and handling will be performed with heavy equipment. The material generated by this limited interior demolition will be

transported using skid steer loaders and placed into dumpsters/trailers. Once the interior gut of the buildings has been completed, CDM Smith will begin demolishing the building structures.

Demolition

CDM Smith anticipates using one large hydraulic excavator equipped with grapples, buckets, and concrete processors to safely dismantle and downsize the structure. Other smaller hydraulic excavators will be mobilized to segregate, further downsize, and load the various materials resulting from demolition activities. Front end loaders and skid steer loaders will assist the excavators in material segregation, clean-up, and loading out of the building materials. Fire hoses and/or a DustBoss® will be used to mist and suppress the dust. Machines will start demolition of the building systematically bay by bay, top to bottom, utilizing exterior walls for additional dust/noise/visual protection. Exterior walls will be “pulled in” onto the existing slabs. The roof and upper-level structures will be dismantled into the building footprint to ensure building components stay within the work zone. Walls will be collapsed into the footprint of the site in a systematic and controlled manner for removal and processing. The excavator will be equipped with a shear attachment to tear and cut steel and mechanical systems into manageable pieces, working from the top down. Skid steer loaders and laborers will assist in supporting the excavator as required. No exterior walls will be allowed to stand in an unsafe or injurious condition at the end of any shift.

All concrete slabs and supports will be munched, sheared, and processed with various excavators with grapple and concrete crushing attachments to process concrete. All the rebar and steel will be processed out of the concrete for removal to a scrap recycler. Debris resulting from demolition will be segregated into different piles for load-out. These materials include metals (ferrous and non-ferrous), recyclable C&D, non-recyclable C&D, masonry, concrete, etc. This segregation shall occur throughout the demolition process.

Once soil assessment has been completed as described in **Section 5.3**, backfill will begin. Assuming soil assessment shows no sign of contamination or release, backfill is planned daily to minimize open excavations and stormwater management. Backfill will be deposited in 12-inch lifts and rough graded. Lifts within excavated trenches will be compacted via bucket tampering, while large areas will be compacted with two passes of a dozer or similar equipment.

5.2.2 CLIN 002 – Facility No. 2 Deconstruction of the Emergency Generator

Prior to deconstruction, hazardous material identified by HSE Consulting Services, LLC. will be removed by licensed professionals. Hazardous material associated with the Emergency Generator Building are inclusive of the following:

- Lead Based Paint – Based on the lead sample results, no specialized deconstruction procedures are required for lead based painted material.
- Polychlorinated Biphenyls (PCBs) – Sample results were below regulated concentrations. No specialized deconstruction procedures are required for PCBs.
- Universal Waste – Waste Batteries and Waste Fluorescent Lamps

Pre-demolition and demolition of CLIN 002 will follow the same process as CLIN 001 as outlined in **Section 5.2.1**. The generator, Tank No. 114B, and Tank No. 114C will be removed from the building structure for handling and disposal. Any liquids will be removed and containerized for disposal or recycling. All disturbed soils within the PFAS impacted area will be excavated and stockpiled separately as needed.

5.2.3 CLIN 003 Facility No. 3 Deconstruction of the Storage Building

Prior to deconstruction, hazardous material identified by HSE Consulting Services, LLC. will be removed by licensed professionals. Hazardous material associated with the Storage Building are inclusive of the following:

- Asbestos – Expansion Joint Caulk
- Lead Based Paint – Based on the lead sample results, no specialized deconstruction procedures are required for lead based painted material.
- Polychlorinated Biphenyls (PCBs) – Sample results were below regulated concentrations. No specialized deconstruction procedures are required for PCBs.
- Universal Waste – Waste Fluorescent Lamps and Mercury Containing Equipment

Pre-demolition and demolition of CLIN 003 will follow the same process as CLIN 001 as outlined in **Section 5.2.1**. Any surplus material within the building will be sorted as needed for proper disposal. All disturbed soils within the PFAS impacted area will be excavated and stockpiled separately as needed.

5.2.4 CLIN 004 Facility No. 5 Deconstruction of the Fire Suppression Building (Water Supply Building)

Prior to deconstruction, hazardous material identified by HSE Consulting Services, LLC. will be removed by licensed professionals. Hazardous material associated with the Fire Suppression Building (Water Supply Building) are inclusive of the following:

- Asbestos – Expansion Joint Caulk
- Lead Based Paint – Based on the lead sample results, no specialized deconstruction procedures are required for lead based painted material.
- Polychlorinated Biphenyls (PCBs) – Sample results were below regulated concentrations. No specialized deconstruction procedures are required for PCBs.
- Universal Waste – Waste Batteries, Waste Fluorescent Lamps and Mercury Containing Equipment

Pre-demolition and demolition of CLIN 004 will follow the same process as CLIN 001 as outlined in **Section 5.2.1**. PFAS equipment including piping, vessels and fittings will be handled separately for disposal at a subtitle C disposal facility. The 15 fire-fighting foam canisters are anticipated to be returned to the manufacturer. Tank No. 118 will be removed from the building structure for handling and disposal. Any liquids will be removed and containerized for disposal or recycling. All disturbed soils within the PFAS impacted area will be excavated and stockpiled separately as needed.

5.2.5 CLIN 005 Facility No. 7 Deconstruction of the Maintenance Building

Prior to deconstruction, hazardous material identified by HSE Consulting Services, LLC. will be removed by licensed professionals. Hazardous material associated with the Maintenance Building are inclusive of the following:

- Lead Based Paint – Based on the lead sample results, no specialized deconstruction procedures are required for lead based painted material.
- Polychlorinated Biphenyls (PCBs) – Sample results were below regulated concentrations. No specialized deconstruction procedures are required for PCBs.
- Universal Waste – Waste Fluorescent Lamps and Mercury Containing Equipment

Pre-demolition and demolition of CLIN 005 will follow the same process as CLIN 001 as outlined in **Section 5.2.1**. All liquids will be removed from the septic sump and tank for disposal. All disturbed soils within the PFAS impacted area will be excavated and stockpiled separately as needed.

5.2.6 CLIN 006 Facility No. 011 Deconstruction of Tank No. 1

Prior to deconstruction, hazardous material identified by HSE Consulting Services, LLC. will be removed by licensed professionals. Hazardous material associated with Tank No. 1 are inclusive of the following:

- Lead Based Paint – Based on the lead sample results, no specialized deconstruction procedures are required for lead based painted material.
- Polychlorinated Biphenyls (PCBs) – Sample results were below regulated concentrations. No specialized deconstruction procedures are required for lead based painted material.)

Pre-Demolition

The nearby monitoring wells will be protected with plate steel and jersey barriers/steel protection system. Prior to deconstruction the work area will be visually inspected to ensure complete protection. All utilities will be cut, capped, and made safe. Prior to deconstruction, the tank will be visually inspected for any contents. If necessary, tank contents will be cleaned/removed at the direction of the AFCEC.

Demolition

An excavator (CAT 345 or larger) with shear attachment will begin at the top of the tank to puncture a hole into the steel, creating access to shear. The shear will begin cutting and tearing the tank in small sections. CDM Smith will ensure the tank sections will gradually fall in a controlled manner into the tank. Since the tank is welded, it will allow the tank to bend and not break. This procedure will be carried out until the tank is safely on the ground. The steel will then be further downsized as needed and loaded into roll offs for recycling.

The concrete slabs and supports up to 6' below grade surface will be broken-up, sheared and processed by excavators equipped with grapples and multi-processors to downsize the concrete. Rebar and steel, if present, will be removed and sent to a recycling facility.

Cathodic protection systems and the containment dike system will be deconstructed. The containment dike fill will be removed with an excavator. Soils designated for reuse will be spread to achieve rough grading of the disturbed footprint. All disturbed soils within the PFAS impacted area will be excavated and stockpiled separately as needed.

5.2.7 CLIN 007 Facility No. 011 Deconstruction of Tank No. 2

Prior to deconstruction, hazardous material identified by HSE Consulting Services, LLC. will be removed by licensed professionals. Hazardous material associated with Tank No. 2 are inclusive of the following:

- Lead Based Paint – Based on the lead sample results, no specialized deconstruction procedures are required for lead based painted material.
- Polychlorinated Biphenyls (PCBs) – Sample results were below regulated concentrations.

Pre-demolition and demolition of CLIN 007 will follow the same process as CLIN 006 as outlined in **Section 5.2.6**. All disturbed soils within the PFAS impacted area will be excavated and stockpiled separately as needed.

5.2.8 CLIN 008 Facility No. 011 Deconstruction of Tank No. 3

Prior to deconstruction, hazardous material identified by HSE Consulting Services, LLC. will be removed by licensed professionals. Hazardous material associated with Tank No. 3 are inclusive of the following:

- Lead Based Paint – Based on the lead sample results, no specialized deconstruction procedures are required for lead based painted material.
- Polychlorinated Biphenyls (PCBs) – Sample results were below regulated concentrations.

Pre-demolition and demolition of CLIN 008 will follow the same process as CLIN 006 as outlined in **Section 5.2.6**. All disturbed soils within the PFAS impacted area will be excavated and stockpiled separately as needed.

5.2.9 CLIN 009 Facility No. 014 Deconstruction of Tank No. 4 (Containment Area)

Infrastructure within the former containment will be removed, segregated, and disposed of at an appropriate facility. An excavator (CAT 345 or larger) with a bucket will be utilized to remove the containment dike system of the former Tank No. 4 containment area. The stone cover within the containment area will be stripped and stockpiled for future reuse as cover material. The containment dike fill will be removed with an excavator. Soils designated for reuse will be spread to achieve rough grading of the disturbed footprint. All disturbed soils within the PFAS impacted area will be excavated and stockpiled separately as needed.

5.2.10 CLIN 010 Facility No. 016 Deconstruction of the Industrial Wastewater Collection System

An excavator (CAT 345 or larger) with a multiprocessor and/or shear will be utilized to remove the tank bottom water piping, concrete piping supports, truck containment pad and associated infrastructure. Infrastructure within the truck containment pad will be removed by mechanical means, segregated, and disposed of at an appropriate facility. All disturbed soils within the PFAS impacted area will be excavated and stockpiled separately as needed.

Once soil assessment has been completed as described in **Section 5.3**, backfill will begin. Assuming soil assessment shows no sign of contamination or release, backfill is planned daily to minimize open excavations and stormwater management. Backfill will be deposited in 12-inch lifts and rough graded. Lifts within excavated trenches will be compacted via bucket tampering, while large areas will be compacted with two passes of a dozer or similar equipment.

5.2.11 CLIN 011 Facility No. 020 Deconstruction of the Truck Fill Stand (Truck Rack)

Prior to deconstruction, hazardous material identified by HSE Consulting Services, LLC. will be removed by licensed professionals. Hazardous material associated with the Truck Fill Stand (Truck Rack) are inclusive of the following:

- Asbestos – Expansion Joint Caulk
- Lead Based Paint – Based on the lead sample results, no specialized deconstruction procedures are required for lead based painted material.
- Polychlorinated Biphenyls (PCBs) – Sample results were below regulated concentrations.
- Universal Waste – Mercury Containing Equipment

CDM Smith anticipates using one large hydraulic excavator equipped with grapples, buckets, and concrete processors to safely dismantle and downsize the structure. Other smaller hydraulic excavators will be mobilized to segregate, further downsize, and load the various materials resulting from demolition activities. Front end loaders and skid steer loaders will assist the excavators in material segregation, clean-up, and loading out of the building materials. Fire hoses and/or a DustBoss® will be used to mist and suppress the dust. All disturbed soils within the PFAS impacted area will be excavated and stockpiled separately as needed.

Once soil assessment has been completed as described in **Section 5.3**, backfill will begin. Assuming soil assessment shows no sign of contamination or release, backfill is planned daily to minimize open excavations and stormwater management. Backfill will be deposited in 12-inch lifts and rough graded. Lifts within excavated trenches will be compacted via bucket tampering, while large areas will be compacted with two passes of a dozer or similar equipment.

5.2.12 CLIN 012 Facility No. 024 Deconstruction of the Fuel Pipelines

CLIN 012 includes pipeline removal within the Verona DFSP property and Buckeye property. Some sections of pipeline may contain asbestos coated material (ACM).

Pre-Demolition

Prior to completing the fuel line removal within the Buckeye property, pipe pigging will be completed on the above and below grade fuel lines. Pigging will be completed to remove any residuals and condensate and to minimize the potential for petroleum contamination release during removal of the pipelines. Prior to pigging, the pipelines may be drilled to check for liquids if the piping is not already exposed by removal activities on the Verona site. The CO will be notified if liquid is encountered.

The pipe pigging will be completed in multiple sections due to the turns in the pipelines. In preparation for pigging, the piping will be exposed, the asbestos wrap abated, and pipe cut to facilitate the installation of flanges for the pig catcher or pig launcher. Each line will be pigged twice. The rinsate will be captured and transferred into a tank(s) for proper disposal as outlined in the SAP and WMP.

Pipeline Demolition

Non-ACM Pipe

An excavator (CAT 345 or larger) with a shear attachment will cut the pipe into approximately 20-foot sections. Demolition will continue along the pipeline until complete. The steel will then be further downsized as needed for transport to the recycling facility.

ACM Pipe

The topsoil will be stripped and stockpiled for reuse adjacent to the trench. It will be stockpiled separately from excavated soils. Any brush, litter, objectionable weeds, roots, stones larger than 1 inch in diameter, and other materials that would interfere with planting and maintenance operations shall be removed to the extent practical.

After the topsoil is removed, the overburden soil above the piping will be excavated and stockpiled adjacent to the pipeline for accessible re-use or at the staging area based on available space. Soil removal will be minimized to facilitate pipe removal only. The soil around the pipe will be removed at the cut locations taking precautions not to dislodge any of the mastic wrap. Prior to shearing the pipe, the cut location will be wrapped in wet lagging cloth. Poly sheeting will be placed under the pipe to capture any debris generated during the shearing. The pipe will be sheared into 20-foot sections and removed from the excavation and placed on poly sheeting. The pipe will then be wrapped in poly sheeting and placed in lined dumpsters for transport to disposal facility. All disturbed soils within the PFAS impacted area will be excavated and stockpiled separately as needed.

Once soil assessment has been completed as described in **Section 5.3**, backfill will begin. Assuming soil assessment shows no sign of contamination or release, backfill is planned daily to minimize open excavations and stormwater management. Backfill will be deposited in 12-inch lifts and rough graded. Lifts within excavated trenches will be compacted via bucket tampering, while large areas will be compacted with two passes of a dozer or similar equipment.

5.2.13 CLIN 013 Facility No. 026 Deconstruction of the Exterior Area Lights

Prior to the start of any demolition activities, all utilities will be cut, capped, and made safe. An excavator equipped with a bucket or grapple will remove the exterior light poles. Poles will be cut to size and loaded for recycle. All disturbed soils within the PFAS impacted area will be excavated and stockpiled separately as needed.

5.2.14 CLIN 014 Facility No. 028 Deconstruction of the Overhead Electrical Lines

Prior to the start of any demolition activities, all utilities will be cut, capped, and made safe. An excavator equipped with a bucket or grapple will remove the overhead electrical lines and associated poles. Wastes will be segregated and stockpiled for disposal at an appropriate disposal facility.

5.2.15 CLIN 015 Facility No. 030 Deconstruction of the Water Mains

The water main will be cut and capped by the Town of Verona at the property fence line. Once capped, the topsoil will be stripped and stockpiled for reuse adjacent to the trench. It will be stockpiled separately from excavated soils. After the topsoil is removed, the overburden soil above the piping will be excavated and stockpiled adjacent to the pipeline for accessible re-use or at the staging area based on available space. Soil removal will be minimized to facilitate pipe removal only. The pipe will be cut into 20-foot sections with a shear attachment and loaded into roll offs for recycling. All disturbed soils within the PFAS impacted area will be excavated and stockpiled separately.

Once soil assessment has been completed as described in **Section 5.3**, backfill will begin. Assuming soil assessment shows no sign of contamination or release, backfill is planned daily to minimize open excavations and stormwater management. Backfill will be deposited in 12-inch lifts and rough graded. Lifts within excavated trenches will be compacted via bucket tampering, while large areas will be compacted with two passes of a dozer or similar equipment.

5.2.16 CLIN 016 Facility No. 031 Deconstruction of Tank No. 122

Prior to demolition, the existing water in the tank will be pumped out into a container for reuse as dust control. An excavator (CAT 345 or larger) with a shear attachment will begin at the top of the tank to puncture a hole into the tank, creating access to shear. The tank will be sheared and cut into small sections. This procedure will be carried out until the tank is safely on the ground. The steel will then be further downsized as needed and loaded into roll offs for recycling. All disturbed soils within the PFAS impacted area will be excavated and stockpiled separately as needed. Once soil assessment has been completed as described in **Section 5.3**, backfill will begin. Assuming soil assessment shows no sign of contamination or release, backfill is planned daily to minimize open excavations and stormwater management. Backfill will be deposited in 12-inch lifts and rough graded. Lifts within excavated trenches will be compacted via bucket tampering, while large areas will be compacted with two passes of a dozer or similar equipment.

5.2.17 CLIN 017 Facility No. 036 Deconstruction of Septic Tank Systems

Existing liquids will be pumped into a container for disposal. The excavator equipped with a bucket or grapple will excavate the septic field at the site. The leach field bedding will remain in place. All disturbed soils within the PFAS impacted area will be excavated and stockpiled separately. Once soil assessment has been completed as described in **Section 5.3**, backfill will begin. Assuming soil assessment shows no sign of contamination or release, backfill is planned daily to minimize open excavations and stormwater management. Backfill will be deposited in 12-inch lifts and rough graded. Lifts within excavated trenches will be compacted via bucket tampering, while large areas will be compacted with two passes of a dozer or similar equipment.

5.2.18 CLIN 018 Facility No. 038 Deconstruction of the Sanitary Sewer Mains

Demolition of CLIN 018 will follow the same process as CLIN 015 as outlined in **Section 5.2.15**.

5.2.19 CLIN 019 Facility No. 040 Deconstruction of the Storm Drain Lines

Demolition of CLIN 019 will follow the same process as CLIN 015 as outlined in **Section 5.2.15**.

5.2.20 CLIN 020 Facility No. 042 Deconstruction of the Fire Hydrants

Fire hydrants will be removed from the water main line and loaded for recycle. Adjacent bollards will be removed with an excavator and loaded for disposal as C&D waste.

5.2.21 CLIN 021 Facility No. 046 Deconstruction of the Pump Pads

Prior to deconstruction, hazardous material identified by HSE Consulting Services, LLC. will be removed by licensed professionals. Hazardous material associated with the Pump Pads are inclusive of the following:

- Lead Based Paint – Based on the lead sample results, no specialized deconstruction procedures are required for lead based painted material.
- Polychlorinated Biphenyls (PCBs) – Sample results were below regulated concentrations.
- Universal Waste – Mercury Containing Equipment

Multiple double block and bleed (DBB) valves are assumed to be at the site and still in operable condition. CDM Smith will salvage operable DBB valves and return them to the Government. CDM Smith has assumed a quantity of 6 DBB valves and will confirm the final quantity with the CO prior to shipment.

Tank No. 6 will be cut with shears attached to an excavator. All concrete pump pads will be broken-up, sheared, and processed with various excavators with grapple and concrete crushing attachments to process concrete. All the rebar and steel will be processed out of the concrete for recycle. Debris resulting from demolition will be segregated into different piles for load-out. All disturbed soils within the PFAS impacted area will be excavated and stockpiled separately as needed. Once soil assessment has been completed as described in **Section 5.3**, backfill will begin. Assuming soil assessment shows no sign of contamination or release, backfill is planned daily to minimize open excavations and stormwater management. Backfill will be deposited in 12-inch lifts and rough graded. Lifts within excavated trenches will be compacted via bucket tampering, while large areas will be compacted with two passes of a dozer or similar equipment.

5.2.22 CLIN 022 Facility No. 047 Deconstruction of the Foam Fire System

All pumps, valves, tanks, supports, dike penetrations and associated infrastructure will be removed for disposal to a Subtitle C facility. Measures shall be taken to ensure residual foam or liquid is not present or released into the environment.

5.2.23 CLIN 023 Facility No. 048 Deconstruction of the Fire Alarm System

The fire alarm system, horns, posts and all associated infrastructure will be removed for disposal.

5.2.24 CLIN 024 Facility No. 049 Deconstruction of the Truck Fill Stand Canopy

Prior to deconstruction, hazardous material identified by HSE Consulting Services, LLC. will be removed by licensed professionals. Hazardous material associated with the Truck Fill Stand Canopy (Truck Rack) are inclusive of the following:

- Asbestos – Expansion Joint Caulk

- Lead Based Paint – Based on the lead sample results, no specialized deconstruction procedures are required for lead based painted material.
- Polychlorinated Biphenyls (PCBs) – Sample results were below regulated concentrations.
- Universal Waste – Mercury Containing Equipment

Machines will start demolition of the canopy systematically, top to bottom. An excavator will be equipped with a shear attachment to tear and cut steel and mechanical systems into manageable pieces. Skid steer loaders and laborers will assist in supporting the excavator as required.

5.2.25 CLIN 025 Facility No. 050 Deconstruction of the Metal Walkway Bridges

An excavator equipped with a shear will be utilized to remove the metal walkway bridges. The bridges will be downsized on the ground and loaded into roll offs for recycling.

5.2.26 CLIN 026 Facility No. 051 Deconstruction of the Fuel Offloading Station

All lines will be checked for residual liquid prior to demolition. An excavator with a multiprocessor and/or shear will be utilized to remove piping, valves and infrastructure. All disturbed soils within the PFAS impacted area will be excavated and stockpiled separately.

Once soil assessment has been completed as described in **Section 5.3**, backfill will begin. Assuming soil assessment shows no sign of contamination or release, backfill is planned daily to minimize open excavations and stormwater management. Backfill will be deposited in 12-inch lifts and rough graded. Lifts within excavated trenches will be compacted via bucket tampering, while large areas will be compacted with two passes of a dozer or similar equipment.

5.2.27 CLIN 027 Facility No. 052 Deconstruction of the FSII Offloading Station

Demolition of CLIN 027 will follow the same process as CLIN 026 as outlined in **Section 5.2.26**.

5.2.28 CLIN 028 Facility No. 053 Deconstruction of the Cathodic Protection System and Electrical Distribution Building (Electrical Building)

Prior to deconstruction, hazardous material identified by HSE Consulting Services, LLC. will be removed by licensed professionals. Hazardous material associated with the Cathodic Protection System and Electrical Distribution Building (Electrical Building) are inclusive of the following:

- Asbestos – Expansion Joint Caulk
- Polychlorinated Biphenyls (PCBs) – Sample results were below regulated concentrations.
- Universal Waste – Waste Fluorescent Lamps and Mercury Containing Equipment

Pre-demolition and demolition of CLIN 028 will follow the same process as CLIN 001 as outlined in **Section 5.2.1**. All electrical conduits, anodes, rectifiers, and test stations will be removed for disposal.

5.2.29 CLIN 029 Facility No. 054 Deconstruction of the Pit Building

Prior to deconstruction, hazardous material identified by HSE Consulting Services, LLC. will be removed by licensed professionals. Hazardous material associated with the Pit Building are inclusive of the following:

- Lead Based Paint – Based on the lead sample results, no specialized deconstruction procedures are required for lead based painted material.
- Universal Waste – Mercury Containing Equipment

Pre-demolition and demolition of CLIN 029 will follow the same process as CLIN 001 as outlined in **Section 5.2.1.**

5.2.30 CLIN 030 Facility No. 055 Deconstruction of the Automatic Tank Gauging (ATG) Building

Prior to deconstruction, hazardous material identified by HSE Consulting Services, LLC. will be removed by licensed professionals. Hazardous material associated with the Automatic Tank Gauging (ATG Building) are inclusive of the following:

- Lead Based Paint – Based on the lead sample results, no specialized deconstruction procedures are required for lead based painted material.

Pre-demolition and demolition of CLIN 030 will follow the same process as CLIN 001 as outlined in **Section 5.2.1.**

5.2.31 CLIN 0031 Facility No. 056 Protection, Abandonment, and Restoration of Monitoring Wells and Bollards

Prior to the start of demolition, the wells will be protected with a combination of steel plates and physical barriers. Each well will have cones/flags to identify the well to the heavy equipment operators.

Demolition has been planned to not disturb monitoring wells. If a monitoring well is damaged or needs to be adjusted, a licensed driller will be subcontractor to perform the necessary work.

5.2.32 CLIN 032 Facility No. 57 Deconstruction of Concrete Stairs and Sidewalks

An excavator equipped with a hammer attachment will break the stairs and sidewalks into manageable sized sections. A multiprocessor will then be used to downsize the concrete for transport to a local recycling facility. The disturbed footprint will be rough graded.

5.2.33 CLIN 033 Facility No. 058 Deconstruction of the Main Road

An excavator equipped with a hammer attachment will break the asphalt into manageable sized sections. A multiprocessor will then be used to downsize the asphalt for transport to a recycling facility. The disturbed footprint will be rough graded.

5.2.34 CLIN 034 Facility No. 059 Deconstruction of the Perimeter Road

Demolition of CLIN 034 will follow the same process as CLIN 033 as outlined in **Section 5.2.33.**

5.2.35 CLIN 035 Facility No. 060 Deconstruction of the Parking Area

Demolition of CLIN 035 will follow the same process as CLIN 033 as outlined in **Section 5.2.33.**

5.2.36 CLIN 036 Facility No. 062 Deconstruction of Telephone Poles

An excavator (CAT 345 or larger) with a multiprocessor and/or shear will be utilized to remove telephone poles and cut to size for disposal.

5.2.37 CLIN 0037 Facility No. 064 Deconstruction of Tank No. 112B

Prior to deconstruction, hazardous material identified by HSE Consulting Services, LLC. will be removed by licensed professionals. Hazardous material associated with Tank No. 112B are inclusive of the following:

- Lead Based Paint – Based on the lead sample results, no specialized deconstruction procedures are required for lead based painted material.

Demolition of CLIN 037 will follow the same process as CLIN 006 as outlined in **Section 5.2.6**. All disturbed soils within the PFAS impacted area will be excavated and stockpiled separately as needed.

5.2.38 CLIN 038 Facility No. 065 Deconstruction of Tank No. 117

Demolition of CLIN 038 will follow the same process as CLIN 006 as outlined in **Section 5.2.6**.

5.2.39 CLIN 039 Facility No. 066 Deconstruction of Tank No. 5A

Demolition of CLIN 039 will follow the same process as CLIN 006 as outlined in **Section 5.2.6**.

5.2.40 CLIN 040 Facility No. 067 Deconstruction of Tank No. 111A

Demolition of CLIN 040 will follow the same process as CLIN 006 as outlined in **Section 5.2.6**.

5.2.41 CLIN 041 Facility No. 99001 Fee Owned Land

After deconstruction, the site will be graded as shown on C-105 of the DFSP 100% Contract Drawings (EA Engineering, P.C. and its Affiliate EA Science and Technology, February 2024). Four inches of topsoil will be placed to meet the finish grade in disturbed areas as needed. All disturbed soils within the PFAS impacted area which are above the DoD Reuse criteria will be properly disposed of off-site. After areas have been brought to an indicated finish grade, existing topsoil will be amended to meet the requirements. Fertilizer, pH adjusters, and/or soil conditioners will be incorporated into soil only as needed. Debris and stones larger than 1 inch in any dimension remaining on the surface after finish grading will be removed. Any irregularities in finish surfaces will be corrected to eliminate depressions.

Hydroseeding will be completed in accordance with Section 32 92 19 of the Project Specification Index (EA Engineering, 2024). Based on the planned schedule, temporary seeding will be installed in accordance with NYSDOT Standard Specification 209-3.03. Permanent seeding will be completed in the spring of 2026.

Modifications to the existing security gate will consist of disconnecting the electrical motor equipment and pull chain.

5.2.42 CLIN 042 Transportation and Disposal of PFAS Contaminated Soil

Soil pre-characterization sampling will be conducted prior to deconstruction as discussed in **Section 5.1.2** and as outline in the SAP provided under a separate cover.

Based on pre-characterization sample results and direction from the client, soils excavated within the PFAS impacted area may need to be stockpiled separately for disposal. PFAS soils stockpiles will be managed according to the requirements outlined in the EPP provided under a separate cover. PFAS soils

will be loaded for disposal to Subtitle C disposal facility described in the WMP provided under separate cover.

Heavy equipment will be decontaminated by brushing off loose dirt prior to leaving the PFAS-impacted areas to eliminate cross contamination.

5.2.43 CLIN 043 Storage, Transportation, and Disposal of Petroleum Contaminated Soil

Soils excavated or disturbed during demolition activities will be observed for visual or olfactory indicators of contamination. If soil observations and photoionization detector (PID) screening indicate petroleum impacts, the excavation and sampling procedure outlined in the SAP provided under a separate cover will be followed.

Petroleum soil stockpiles will be managed according to the requirements outlined in the EPP provided under a separate cover. If required, petroleum impacted soils will be loaded for disposal as described in the WMP.

5.3 Deconstruction Evaluations and Sampling

Field evaluations will be conducted as described in the SAP provided under a separate cover.

5.4 Waste Management

The WMP (provided under separate cover) developed for the Project fully details the waste management practices for the project including salvage for recycling, waste disposal, and facility and subcontractor identification. An Asbestos Abatement Work Plan has been provided under separate submittal cover.

5.4.1 Identification of Waste Transporters

CDM Smith will oversee and direct all subcontractors engaged for waste removal and recycling. The following subcontractors have been identified for waste transportation. Subcontractors may change upon receipt of final proposals:

- Goulet Trucking (POL Soil Disposal Transportation)
- Oneida-Herkimer Solid Waste Authority (POL Soil Disposal)
- Strategic Environmental Services (PFAS Soil Disposal Transportation)
- Republic Services (PFAS Soil Disposal)
- Trident Environmental Group (POL Water Transportation and Disposal)
- Waste Management (PFAS Water Transportation and Disposal)
- Various (Universal Waste)
- Oneida-Herkimer Solid Waste Authority (Asbestos Waste)

- Oneida-Herkimer Solid Waste Authority (Construction and Demolition Debris)
- EMR Recycling (Recycle Material)

5.4.2 Recycling, disposal, and alternate facilities

The WMP (provided under separate cover) outlines recycling and disposal options of waste and C&D materials, facility details, and permits.

5.4.2.1 Waste Characterization Sampling

CDM Smith will collect samples for disposal characterization in accordance with the SAP, provided under a separate cover. The PFAS area soil will be pre-characterized prior to demolition as detailed in **Section 5.1.2**. All disturbed soils excavated from the PFAS impacted area which are above the DoD Reuse criteria will be properly disposed of off-site. If petroleum contaminated soil is encountered, it will be characterized after soil is generated and stockpiled. The samples associated with the petroleum contaminated soil will be collected as soon as possible after the soil has been determined to be contaminated to reduce the time material is onsite until disposal.

Excavated soil that cannot be reused will be disposed of as follows:

- PFAS contaminated soil is anticipated to be taken to Republic Service's disposal facility in Belleville, Michigan. (EPA identification number MID 048 090 633). Wayne Disposal, Inc. phone: 800-592-5489.
- Petroleum contaminated soil is anticipated to be disposed of at a local subtitle D landfill. It is anticipated to be taken to Oneida-Herkimer Solid Waste Authority landfill at 7044 State Route 294 Boonville, NY (Solid Waste Management Permit: 6-3024-00009/00001). Oneida-Herkimer Solid Waste Authority phone: 315-733-1224.
- It is not anticipated that material will exceed the RCRA Characteristic levels for TCLP concentrations (40 CFR §261.24). If the material exceeds the criteria, an appropriate facility will be identified for disposal of the material.
- It is not anticipated that the material will contain polychlorinated biphenyls. If the material contains polychlorinated biphenyls greater than Toxic Substances Control Act (TSCA) thresholds, an appropriate TSCA facility will be identified for disposal of the material.

Waste characterization sample results and copies of waste manifests will be included in the Project Closeout Report.

Further details of waste management are provided in the WMP, provided under a separate submittal cover.

5.4.2.2 Collection, Transport, and Disposal of Dewatering Liquid

The fuel pipeline associated with the Buckeye property will be pigged prior to removal. The estimated volume of petroleum contaminated rinsate is 3,000 gallons since the pipelines have been previously cleaned and emptied per site background documents. The water collected will be sampled by CDM Smith (in accordance with the SAP) and submitted for laboratory analysis for disposal characterization per facility requirements.

Water associated with potential petroleum contaminated soil excavations and the 5 gallons of incidental water associated with the removal of up to 25 LF of fuel lines within the Verona property will be captured and stored in a 20,000-gallon frac tank or other suitable containers. Dewatering water from contaminated areas will be containerized and disposed. Dewatering water from uncontaminated areas will be managed in accordance with the EPP and SWPPP, provided under separate covers. Once the frac tank is full, the water collected will be sampled in accordance with the SAP and submitted for laboratory analysis for disposal characterization per facility requirements. Petroleum contaminated water in excess of 20,000 gallons will be handled as a Unit Rate cost item negotiated with the government.

Further details of wastewater management are provided in the WMP, provided under a separate submittal cover.

5.5 Documentation and Recordkeeping

5.5.1 Monthly Progress Reports

Monthly Progress Reports will be developed using AF Form 3065 or similar. The reports will document progress of activities, activities forecasted for future months, and problems/issues with scope or schedule. Monthly Progress Reports will be submitted to the AFCEC throughout the duration of the project and provided to NYSDEC for the duration of deconstruction and soil management activities on-site. Along with the Monthly Progress Report, CDM Smith will provide an updated project schedule and submittal register.

5.5.2 Daily Construction Inspection Reports

Daily Construction Inspection Reports will be developed with AF Form 1477 or similar recording daily progress, site personnel and visitors, meetings, issues, resolutions, and any other pertinent information. The SSHO's Daily Inspection Log and the CQCSM's Daily Quality Control Report will be included with the Daily Construction Inspection Reports. Photos will be taken daily to support the report and show deconstruction progress.

5.5.3 Weekly Reports

Field activities from the Daily Construction Inspection Reports will be summarized and submitted as Weekly Reports to NYSDEC and New York State Department of Health (NYSDOH). These Weekly Reports will include:

- Progress made during the week
- Locations of work
- Quantities and descriptions of materials imported to and exported from the site
- Summary of any complaints received
 - Including names and phone numbers
- Community Air Monitoring Data
 - Including if any CAMP exceedances occurred and what mitigation responses were implemented

- CAMP exceedances will be reported to NYSDEC and NYSDOH the same day, or the next business day if after hours, along with the reason for exceedance, corrective actions completed, and if the action was effective.
- Notable site conditions
- Work plan deviations

5.6 Decontamination Procedures and Coordination With APP/SSHP

The Accident Prevention Plan/Site Safety and Health Plan (APP/SSHP) has been developed and provided under separate cover. Decontamination procedures are outlined in the Asbestos Abatement Plan provided under a separate cover. The SSHO and Environmental Manager will ensure that appropriate decontamination processes are used in asbestos work areas and work is conducted in compliance with federal, state, and local, requirements.

Asbestos work areas will have a physical boundary and warning signs at all approaches to controlled work areas. Signs will be sized, formatted, and located at an appropriate distance from the work area in compliance with state and federal requirements.

5.6.1 Asbestos Abatement

The Asbestos Abatement Plan specifies the requirements for removal, handling, and disposal of Asbestos-Containing Materials (ACM). Select (the asbestos abatement subcontractor) will provide a competent person to ensure procedures in the plan are followed including setting up of isolation barriers, ensuring enclosure integrity, controlling regulated areas, monitoring contamination levels, and ensuring PPE and respirators are use.

Select will provide a personnel decontamination unit (PDU) facility. The PDU will consist of separate chambers directly attached to each other and the work area. The PDU will be compliant with 29 CFR 1910.141.

Work area entry/exit requirements, emergency evacuation, contingency plans, waste disposal, and further work details are provided in the Asbestos Abatement Plan.

Asbestos removal operations will not begin until the work area and PDU System have been inspected and approved by the Competent Person.

5.7 Demobilization

5.7.1 Temporary Facilities Removal

5.7.1.1 Remove Temporary Facilities

Upon completion of the Project, CDM Smith will remove the bulletin board, signs, barricades, and any other temporary products from the site. After temporary offices are cleaned out, utilities will be terminated. Temporary offices and toilets will be removed from the site.



6.0 Quality Control/Quality Assurance

Construction Quality Control (QC) will be accomplished using the three-phases of control and inspection system for each major Definable Features of Work (DFOW). Three-phase control meetings will occur to define inspection, testing and construction methods for documentation and consensus among the CQCM, General Superintendent, Subcontractor Foreman/Field Superintendent, and staff involved with work. A DFOW is a task that is separate and distinct from all other tasks and has a specific set of control requirements. DFOWs usually follow the specification sections. Each control phase provides an opportunity for improvement and prevention of deficiencies. Implementation of the three-phase process is the responsibility of the Project Team and is monitored by the CQCM. CDM Smith has developed a Contractor Quality Control Plan (CQCP), provided under separate cover, which details the Quality Assurance and Quality Control (QA/QC) process for the deconstruction project.

CDM Smith's CQCM, Jeff Mullen, is responsible for ensuring that the work is performed per the Contract Documents, Specifications, and approved submittals. This also includes responsibility for the work outlined in the CQCP and the SAP/Quality Assurance Project Plan (QAPP) provided under separate cover.

Work performed for this project will comply with the Project Specification Index (EA Engineering, 2024), approved submittals, DFSP 100% Contract Drawings (EA Engineering, 2024), EM 385-1-1 (USACE 2024), and all applicable federal, state, and local laws, ordinances, criteria, rules, and regulations.

6.1 Corrective Action Procedures

Materials delivered to the site will be received and inspected for conformance per project requirements. A stored material log will be maintained. Non-conforming equipment will be identified by the CQCM for corrective action before installation.

A non-conformance is an unapproved deviation from the Contract Documents, a deficiency in characteristic, documentation, or procedure, which renders the quality of an item unacceptable or indeterminate, which includes failures, malfunctions, deficiencies, deviations, defective material, or equipment and other non-conformance.

Non-conformance identified by CDM Smith employees, vendors, subcontractors, consultants, or others will be reported directly to the CQCM. The CQCM will investigate and document non-confirming work for improvement. Items that cannot be readily reworked to conform to Contract Documents will be documented on a Non-Conformance Report (NCR). A log of non-conformance or re-work will be documented.

Further details of corrective action procedures and templates for the Non-Conformance Report and Non-Conformance Log are provided in the CQCP provided under separate cover.

6.2 Final Quality Inspections

Punch Out and Pre-Final Inspections will be completed for each CLIN before demobilization. Final Inspection and Acceptance will be performed at one time for all CLINs at the end of the project.

6.2.1 Punch Out Inspection

Near the completion of all work, the QC Manager will inspect the work and develop a "punch list" of items which do not conform to the approved drawings, specifications, and Contract. Included in the punch list will be any remaining items on the "Rework Items List", which were not corrected prior to the Punch-Out Inspection. Included within the punch list will be an estimated date by which the deficiencies will be corrected. A copy of the list will be provided to the CO. The QC Manager will confirm that all deficiencies have been corrected. Once this is accomplished, CDM Smith will notify the Government that the facility is ready for the Government "Pre-Final Inspection".

6.2.2 Pre-Final Inspection

A Government "Pre-Final Punch List" will be documented by the QC Manager following this review. The QC Manager will ensure that all items on this list are corrected prior to notifying the Government that a "Final" inspection can be scheduled. Any items noted on the "Pre-Final" inspection must be corrected in a timely manner and be accomplished before the contract completion date for the work.

6.2.3 Final Acceptance Review

CDM Smith will notify the CO at least 14 calendar days prior to the date a final acceptance review can be held. The CQCM, the Project Superintendent, and others deemed necessary will be present during the final accept review. Attendees for the Government will include the CO and other personnel representing the Client. Before final acceptance, the Government may elect to inspect the area with their own personnel.



7.0 Spill and Discharge Control Practices Reporting

The EPP drafted by CDM Smith and provided under separate cover outlines spill and discharge control practices.

If a spill occurs, the Site Safety Health Officer (SSHO) will be notified immediately. The SSHO will determine if the spill or release can be handled safely by facility personnel. The following general response procedures will be followed by personnel in the event of a release that does not have the potential for fire or other life-threatening situations.

- 1) Turn off nearby ignition sources
- 2) Stop spill source by closing valves or plugging holes in container equipment
- 3) Contain/clean up the spill using oil-dry or other appropriate absorbent materials (an oil/diesel fuel spill kit will be maintained on site)
- 4) Place spilled material into appropriate container
- 5) Dispose of spilled material properly

Significant spills, as defined by EPA, include, but are not limited to, releases of oil or hazardous substances more than reportable quantities (under Section 311 of the Clean Water Act [see 40 CFR 110.10 and CFR 117.21]).

CDM Smith will notify the project's CO, Elizabeth Wergin, immediately upon a release to the environment by phone, 1-210-394-7945, and by email, elizabeth.wergin@us.af.mil. Verbal and written notifications will be provided in accordance with federal (40 CFR 300.125 and 40 CFR 355), state, local regulations.

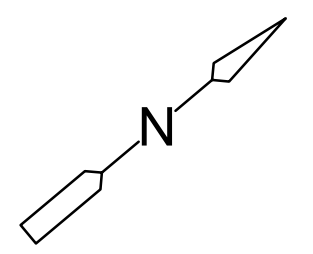
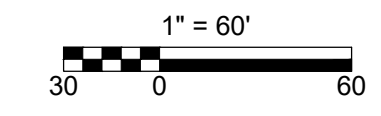


8.0 References

- 1) EA Engineering, 2025. Project Specification Index, 100% Design Submittal, Demolition of Defense Fuel Support Point, Verona, New York. February 2024, Updated January 2025.
- 2) EA Engineering, 2025. *Statement of Work, Conus Worldwide Engineering and Construction (WEC), Demolition of Defense Fuel Support Point, Verona, New York.* 8 January 2025.
- 3) HSE Consulting Services, 2018. Report of Findings for Hazardous Materials Assessment, Verona DFSP, 5449 West Main Street, Verona, New York. 29 November 2018.
- 4) NYSDEC, 2023. *Sampling, Analysis, and Assessment of PFAS Guidance Document.* April 2023.
- 5) NYSDEC, 2010. *Department of Environmental Remediation (DER-10), Technical Guidance for Site Investigation and Remediation.* 3 May 2010, Revised 9 April 2019.

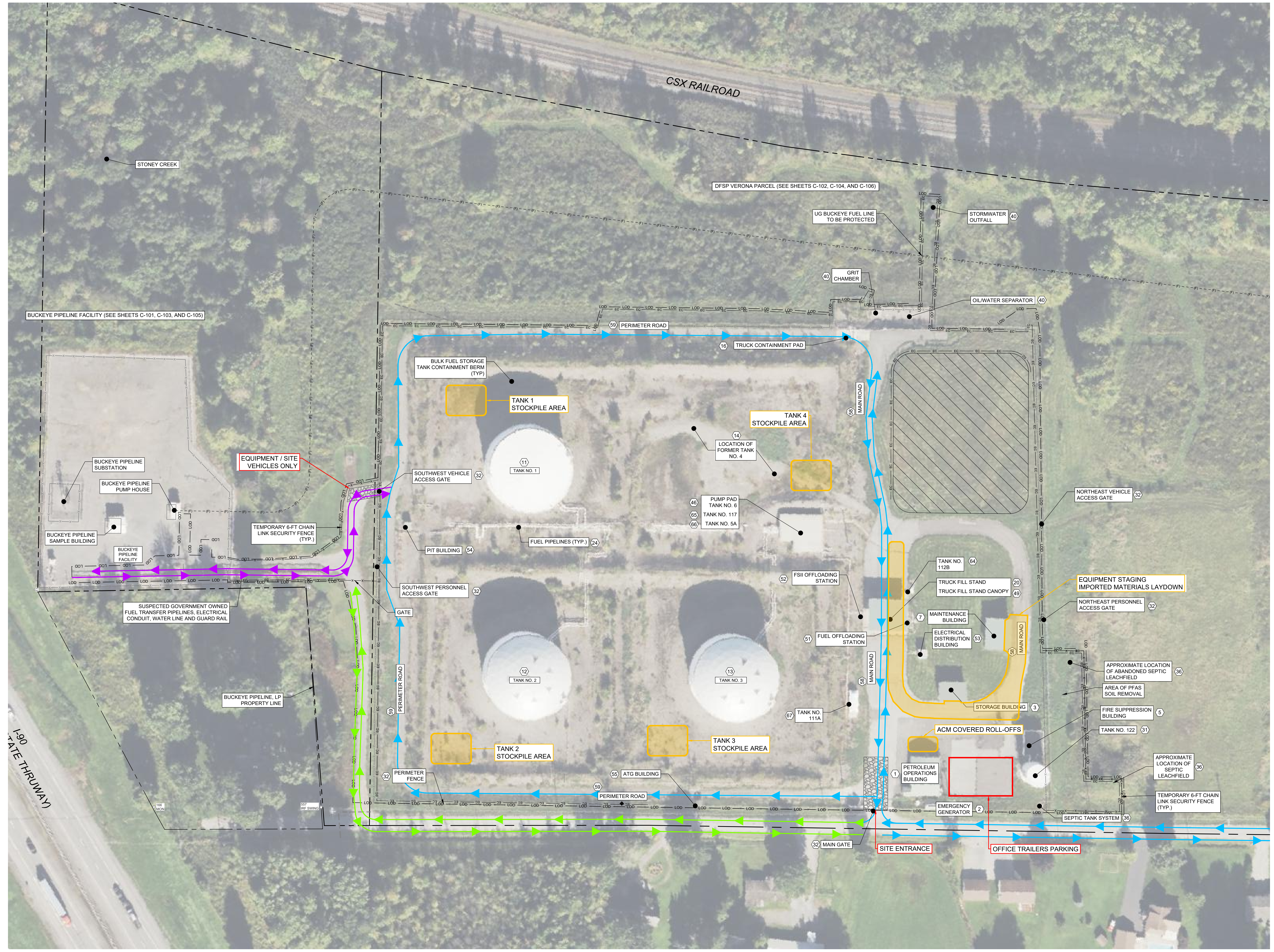


Figures

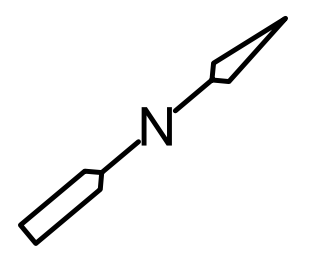
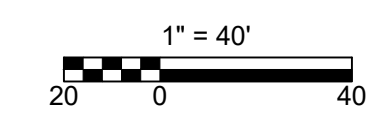


- NOTES:**
1. IF NECESSARY, ASSUMED PFAS IMPACTED SOIL WILL BE STOCKPILED WITHIN THE ASSUMED PFAS IMPACTED AREA.
 2. THE USE OF THE BUCKEYE ACCESS ROADS SHALL ONLY SUPPORT THE REMOVAL OF INFRASTRUCTURE ON THE BUCKEYE PIPELINE PROPERTY.

- LEGEND:**
- STOCKPILE / STAGING / LAYDOWN AREAS
 - TRUCK HAULING ROUTE
 - BUCKEYE PIPELINE PROPERTY TRUCK HAULING ROUTE
 - BUCKEYE PIPELINE PROPERTY EQUIPMENT ACCESS ROUTE

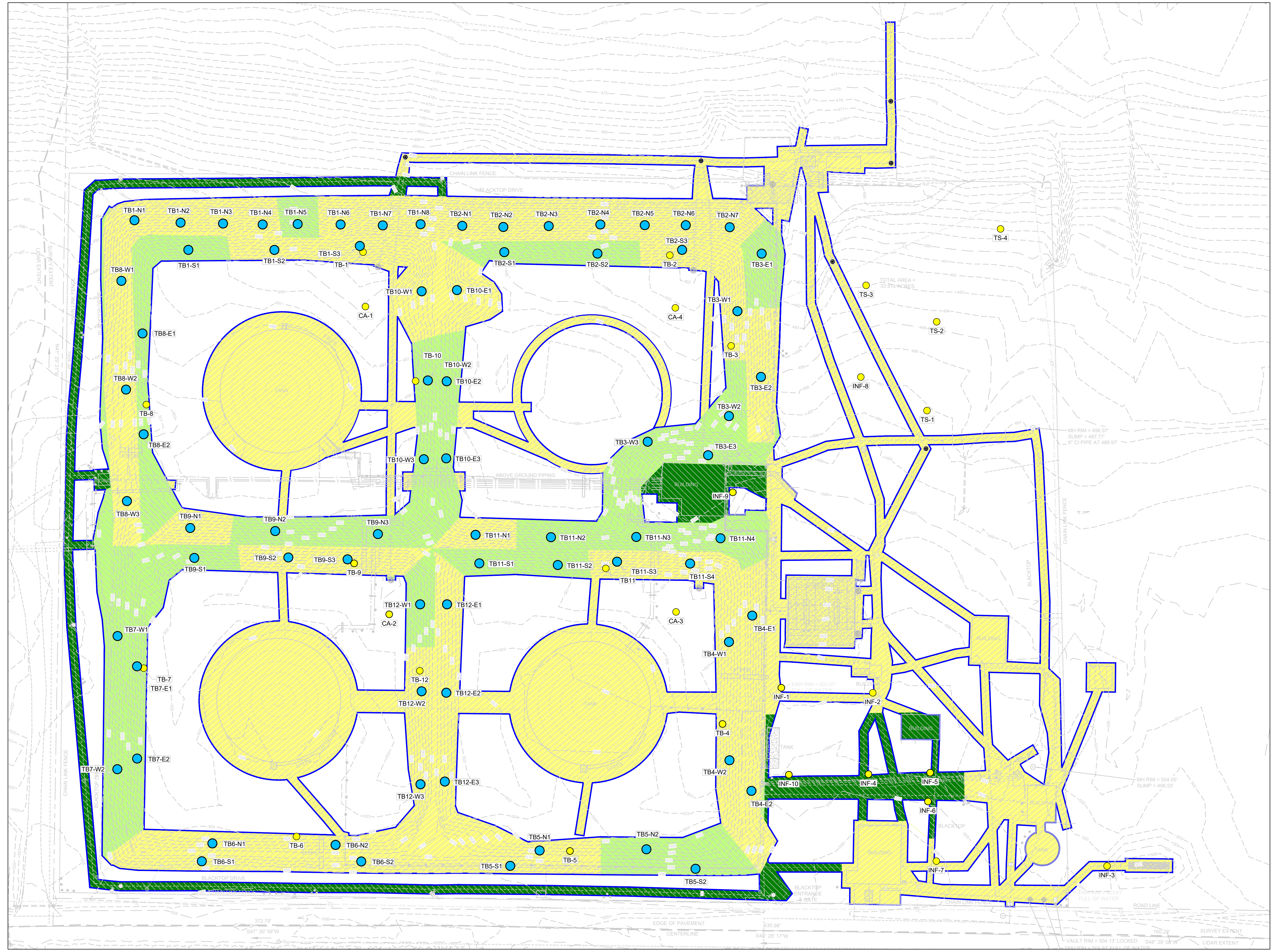


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- NOTES:**
1. BASE PLAN SOURCED FROM FEBRUARY 2024 EA ENGINEERING 100% DESIGN DRAWINGS, DFSP DECONSTRUCTION DESIGN, VERONA.
 2. SAMPLING LOCATIONS ARE APPROXIMATE.
 3. BOUNDARIES OF EXCAVATION AREAS ARE APPROXIMATE.
 4. EXCAVATED SOILS WITHIN THE PFAS-IMPACTED AREA WILL BE DISPOSED OF OFFSITE.

- LEGEND:**
- FIRST SAMPLING EVENT - MAY 2025
 - SECOND SAMPLING EVENT - SEPTEMBER 2025
 - PROPOSED EXCAVATION AREA
 - PFAS-IMPACTED AREA
 - SOILS FOR REUSE THROUGHOUT SITE
 - SOILS FOR REUSE IN PLACE



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Appendix A Site Contact List

Verona DFSP Deconstruction - Contact List

2025.05.02

Name	Role	Organization	Phone No.	Email
Nicole Barry	Senior Project Manager	CDM/CAPE JV	978-265-3796	barrynm@cdmsmith.com
Rene Larson	Project Manager	CDM/CAPE JV	978-418-3453	larsonr@cdmsmith.com
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Christopher Blanchette	Client Service Leader	CDM/CAPE JV		blanchetteci@cdmsmith.com
Scott Anderson	Federal Construction Lead	CDM/CAPE JV	704-641-9498	andersonsj@cdmsmith.com
Kelly Roach	Corporate Quality Control/CQCSM - Alternate	CDM/CAPE JV	615-340-6510	roachkl@cdmsmith.com
Kenneth Meyer	Corporate Health & Safety	CDM/CAPE JV	303-949-5236	meyerka@cdmsmith.com
Amy Picunas	NY PE/Environmental Professional/Manager	CDM/CAPE JV	518-782-4526	picunasae@cdmsmith.com
Jessica Paquette	Environmental Lead	CDM/CAPE JV	617-452-6120	paquettejw@cdmsmith.com
Bryan Benoit	Construction Superintendent/SSHO	CDM/CAPE JV	315-418-0361	benoitbr@cdmsmith.com
Jeff Mullen	CQCSM/Environmental Technician	CDM/CAPE JV	315-374-1923	mullenjw@cdmsmith.com
Evan Wall	Construction Specialist	CDM/CAPE JV	978-408-5166	wallep@cdmsmith.com
Elizabeth Wergin	Contracting Officer	AFCEC	210-394-7945	elizabeth.wergin@us.af.mil
Matt Martin	Project Manager / COR	AFCEC	210-410-7813	matthew.martin.2@us.af.mil
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Mike O'Neill	Title II	EA Engineering	410-207-1500	moneill@eaest.com
Ron Mack	Title II	EA Engineering	508-272-3069	rmack@eaest.com
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Cassandra Covill	Title II	EA Engineering		ccovill@eaest.com
Joshua Blais	Title II	EA Engineering		jblais@eaest.com
Anthony Sandoval		Defense Logistics Agency (DLA) Energy		anthony.sandoval@dla.mil
William DeLosSantos	Program Manager	DLA Energy	571-585-6758	william.delossantos@dla.mil
Jose Castillo		DLA Energy		jose.castillo@dla.mil
Joseph Cavanagh	Senior Environmental Scientist - Project Support	DLA Energy	732-996-0114	joseph.cavanagh.ctr@dla.mil
Dan Maciag	Codes Enforcement Officer	Town of Verona	315-363-6799 ext 24	codestov@townverona.org
Scott Musacchio	Town Supervisor	Town of Verona	315-363-6799 ext 23	supervisor@townverona.org
Tim Batch	Operations (Water)	Town of Verona	315-363-6799	
Mark Davis	Authorized Representative	Buckeye Properties	610-483-0720	madavis@buckeye.com
Patrick Dougher	Buckeye On-Site Inspector	Buckeye Properties	315-283-0939	pdougher@buckeye.com
Kevin Boland	Representative	CSX Rail	904-279-3818	Kevin_Boland@CSX.com
Greg Sampson	Vice President	Select	401-714-4143	gsampson@selectdemo.com
Dominic Ignagni	Senior Project Executive	Select		dignagni@selectdemoservices.com



Appendix B Community Air Monitoring Plan

Community Air Monitoring Plan

This Community Air Monitoring Plan (CAMP) provides guidance for real time air monitoring of particulates and volatile organic compounds (VOCs) during deconstruction activities at the Verona Defense Fuel Support Point (DFSP). Continuous monitoring of particulates and VOCs will be conducted during all ground intrusive activities and during demolition of contaminated or potentially contaminated structures.

VOC Monitoring, Response Levels, and Actions

Volatile organic compounds (VOCs) must be monitored at the downwind perimeter of the immediate work area (i.e., the exclusion zone) on a continuous basis or as otherwise specified. Upwind concentrations should be measured at the start of each workday and periodically thereafter to establish background conditions, particularly if wind direction changes. The monitoring work should be performed using equipment appropriate to measure the types of contaminants known or suspected to be present. The equipment should be calibrated at least daily for the contaminant(s) of concern or for an appropriate surrogate. The equipment should be capable of calculating 15-minute running average concentrations, which will be compared to the levels specified below.

- If the ambient air concentration of total organic vapors at the downwind perimeter of the work area or exclusion zone exceeds 5 parts per million (ppm) above background for the 15-minute average, work activities must be temporarily halted and monitoring continued.
 - If the total organic vapor level readily decreases (per instantaneous readings) below 5 ppm over background, work activities can resume without continued monitoring.
 - If total organic vapor levels at the downwind perimeter of the work area or exclusion zone persist at levels in excess of 5 ppm over background but less than 25 ppm, work activities must be halted, the source of vapors identified, corrective actions taken to abate emissions, and monitoring continued. After these steps, work activities can resume provided that the total organic vapor level 200 feet downwind of the exclusion zone or half the distance to the nearest potential receptor or residential/commercial structure, whichever is less- but in no case less than 20 feet, is below 5 ppm over background for the 15-minute average.
 - If the organic vapor level is above 25 ppm at the perimeter of the work area, activities must be shutdown.

All 15-minute readings must be recorded and be available for NYSDEC and NYSDOH personnel to review. Instantaneous readings, if any, used for decision making purposes should also be recorded.

Particulate Monitoring, Response Levels, and Actions

Particulate concentrations should be monitored continuously at the upwind and downwind perimeters of the exclusion zone at temporary particulate monitoring stations. The particulate monitoring should be performed using real-time monitoring equipment capable of measuring particulate matter less than 10 micrometers in size (PM-10) and capable of integrating over a period of 15 minutes (or less) for comparison to the airborne particulate action level. The equipment must be equipped with an audible

alarm to indicate exceedance of the action level. In addition, fugitive dust migration should be visually assessed during all work activities.

- If the downwind PM-10 particulate level is 100 micrograms per cubic meter (mcg/m^3) greater than background (upwind perimeter) for the 15-minute period or if airborne dust is observed leaving the work area, the dust suppression techniques must be employed.
 - Work may continue with dust suppression techniques provided that downwind PM-10 particulate levels do not exceed $150 \text{ mcg}/\text{m}^3$ above the upwind level and provided that no visible dust is migrating from the work area.
 - If, after implementation of dust suppression techniques, downwind PM-10 particulate levels are greater than $150 \text{ mcg}/\text{m}^3$ above the upwind level, work must be stopped and a re-evaluation of activities initiated. Work can resume provided that dust suppression measures and other controls are successful in reducing the downwind PM-10 particulate concentration to within $150 \text{ mcg}/\text{m}^3$ of the upwind level and in preventing visible dust migration.

All readings must be recorded and be available for NYSDEC and NYSDOH and County Health personnel to review.

Fugitive Dust and Particulate Monitoring

A program for suppressing fugitive dust and particulate matter monitoring at hazardous waste sites is a responsibility on the remedial part performing the work. These procedures must be incorporated into appropriate intrusive work plans. The following fugitive dust suppression and particulate monitoring program should be employed at sites during construction and other intrusive activities which warrant its use.

- Reasonable fugitive dust suppression techniques must be employed during all site activities which may generate fugitive dust.
- Particulate monitoring must be employed during the handling of waste or contaminated soil or when activities on-site may generate fugitive dust from exposed waste or contaminated soil.
 - Remedial activities may also include the excavation, grading, or placement of clean fill. These control measures should not be considered necessary for these activities.
- Particulate monitoring must be performed using real-time particulate monitors and shall monitor particulate matter less than ten microns (PM-10) with the following minimum performance standards:
 - Objects to be measured: Dust, mists or aerosols
 - Measurement Ranges: 0.001 to $400 \text{ mcg}/\text{m}^3$ (1 to $400,000 \text{ :ug}/\text{m}^3$)
 - Precision (2-sigma) at constant temperature: $\pm 10 \text{ :g}/\text{m}^3$ for one second averaging; and $\pm 1.5 \text{ g}/\text{m}^3$ for sixty second averaging
 - Accuracy: $\pm 5\%$ of reading \pm precision (referred to gravimetric calibration with SAE fine test dust ($\text{mmd} = 2$ to 3 :m , $g = 2.5$, as aerosolized))

- Resolution: 0.1% of reading or 1 g/m³, whichever is larger
 - Particulate Size Range of Maximum Response: 0.1-10
 - Total Number of Data Points in Memory: 10,000
 - Logged Data: Each data point with average concentration, time/date and data point number
 - Run Summary: overall average, maximum concentrations, time/date of maximum, total number of logged points, start time/date, total elapsed time (run duration), STEL concentration and time/date occurrence, averaging (logging) period, calibration factor, and tag number
 - Alarm Averaging Time (user selectable): real-time (1-60 seconds) or STEL (15 minutes), alarms required
 - Operating Time: 48 hours (fully charged NiCd battery); continuously with a charger
 - Operating Temperature: -10 to 50°C (14 to 122°F)
 - Particulate levels will be monitored upwind and immediately downwind at the working site and integrated over a period not to exceed 15 minutes.
- In order to ensure the validity of the fugitive dust measurements performed, there must be appropriate Quality Assurance/Quality Control (QA/QC). It is the responsibility of the remedial party to adequately supplement QA/QC plans to include the following critical features: periodic instrument calibration, operator training, daily instrument performance (span) checks, and a record keeping plan.
 - The action level will be established at 150 ug/m³ (15 minute average). While conservative, this short-term interval will provide a real-time assessment of on-site air quality to assure both health and safety. If particulate levels are detected in excess of 150 ug/m³, the upwind background level must be confirmed immediately. If the working site particulate measurement is greater than 100 ug/m³ above the background level, additional dust suppression techniques must be implemented to reduce the generation of fugitive dust and corrective action taken to protect site personnel and reduce the potential for contaminant migration. Corrective measures may include increasing the level of personal protection for on-site personnel and implementing additional dust suppression techniques. Should the action level of 150 ug/m³ continue to be exceeded, work must stop and NYSDER must be notified as provided in the site design or remedial work plan. The notification shall include a description of the control measures implemented to prevent further exceedances.
 - It must be recognized that the generation of dust from waste or contaminated soil that migrates off-site, has the potential for transporting contaminants off-site. There may be situations when dust is being generated and leaving the site and the monitoring equipment does not measure PM-10 at or above the action level. Since this situation has the potential to allow for the migration of contaminants off-site, it is unacceptable. While it is not practical to quantify total suspended particulates on a real-time basis, it is appropriate to rely on visual observation. If dust is observed leaving the working site, additional dust suppression techniques must be employed. Activities that have a high dusting potential – such as solidification and treatment

involving materials like kiln dust and lime – will require the need for special measures to be considered.

- The following techniques have been shown to be effective for the controlling of the generation and migration of dust during construction activities:
 - Applying water on haul roads
 - Wetting equipment and excavation faces
 - Spraying water on buckets during excavation and dumping
 - Hauling materials in properly tarped or watertight containers
 - Restricting vehicle speeds to 10 mph
 - Covering excavated areas and material after excavation activity ceases
 - Reducing excavation size and/or number of excavations

Experience has shown that the chance of exceeding the 150 ug/m³ action level is remote when the above-mentioned techniques are used. When techniques involving water application are used, care must be taken not to use excess water, which can result in unacceptably wet conditions. Using atomizing sprays will prevent overly wet conditions, conserve water, and provide an effective means of suppressing the fugitive dust.

- The evaluation of weather conditions is necessary for proper fugitive dust control. When extreme wind conditions make dust control ineffective, as a last resort remedial actions may need to be suspended. There may be situations that require fugitive dust suppression and particulate monitoring requirements with action levels more stringent than those provided above. Under some circumstances, the contaminant concentration and/or toxicity may require additional monitoring to protect site personnel and the public. Additional integrated sampling and chemical analysis of the dust may also be in order. This must be evaluated when a health and safety plan is developed and when appropriate suppression and monitoring requirements are established for protection of health and the environment.