



# Davis Hill Development

A Skyview Ventures Company

Mr. Mark Granger  
USEPA  
290 Broadway, 19<sup>th</sup> Floor  
New York, NY 10007

RE: Solar Development at the Rosen Brothers Superfund Site, Cortland, NY

Dear Mr. Granger:

Davis Hill Development, LLC has prepared the following Technical Approach as required per the USEPA. The approach is based on information gleaned for the project's scope of work, answers to project specific questions provided by the New York Susquehanna & Western Railway Corporation (NYS&W Railway), The City of Cortland, the USEPA, and general industry standards.

It is Davis Hill Development's understanding that the project site consists of non-hazardous waste covered with a demarcation fabric, and approximately 1 foot of clean fill. Davis Hill Development understands that there is one (1) main project task to be completed which requires work to be performed under the demarcation fabric at the referenced site. The project tasks include the installation of holes for the placement of utility poles. See **Figure 1**, attached, for an illustration of the project task.

Davis Hill Development will provide necessary equipment, personnel, and material to complete the project as specified. All work will be overseen by personnel certified at a minimum with OSHA 40-Hour HAZWOPER and OSHA 10-Hour Construction Safety. Davis Hill Development employees and representatives will don modified Level D PPE. It is our understanding that all of the on-site waste is assumed to be non-hazardous.

## **SCOPE OF SERVICES**

### **Pre-Project Activities**

- Coordinate with the EPA for logistics.

- Mobilize trained personnel (modified Level D PPE) as well as sufficient equipment and materials to perform the scope of work.
- Davis Hill Development will coordinate with USEPA/NYSDEC to get work activities approved before commencement of the project.
- Davis Hill Development will provide an underground utility clearance of the proposed excavation areas through the Dig Safely New York, municipal authorities, and local public utilities of record.

### **Task 1: Install holes for utility pole installation**

- Davis Hill Development representatives will drill 24-inch holes an estimated 8 ft through subgrade soils.
- Davis Hill Development will collect all subgrade cuttings removed from the installation of the utility poles, and stockpile for disposal. Cuttings will be stockpiled on bermed polyethylene sheeting and covered/secured daily and at the conclusion of the augering effort.
- Backfill will not be required after the augering of the utility pole holes.
- This work plan assumes that groundwater will not be encountered. Gross dry decontamination of the auger and related equipment is proposed at the completion of activities each day.

### **Task 2: Waste Management, Transport, and Disposal**

- Cuttings/excavated soil will be profiled for disposal and acceptance at an approved landfill. EPA's Off-Site Rule approval will be obtained for the disposal facility utilized prior to the shipment of materials to that facility. The excavated soil will be transported to the landfill via NYSDEC Part 364 permitted vehicles.
- Davis Hill Development will complete a waste profile and manifest and will provide the EPA with all disposal documentation upon completion of the project.
- As described above, it is our understanding that all waste is assumed to be non-hazardous.

### **SCHEDULE/PHASING OF ACTIVITIES**

Davis Hill Development will coordinate with the EPA to coordinate auguring. The proposed schedule of activities is outlined below in sequential order of operations. Davis Hill Development will provide USEPA two weeks' notice before commencing activities to the extent possible.

- Augering and Soil Consolidation/Staging                      Approximately 1 day.

■ Soil Profiling and Off-Site Disposal

Approximately 14 Days.

Thank you for the opportunity to submit this Technical Approach Letter. We look forward to discussing the project with you. I can be reached at (914)469-7045 or at [jesse.connor@DHDsolar.com](mailto:jesse.connor@DHDsolar.com)

Sincerely,

*Jesse Connor* 5/28/2025

Jesse Connor  
Director of Construction  
Davis Hill Development, LLC

cc: Michael Belveg, NYSDEC

