

November 24, 2025

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Subject: William Street Park, Corning NY Supplemental PDI Work Plan

Introduction

This letter serves as a supplement to the 2025 William Street Park Pre-Design Investigation (PDI) work plan (Parsons 2025a). Additional subsurface investigations are planned to further assess the presence of ash brick and glass (ABG) fill at William Street Park (Site) and to pre-characterize the waste characteristics of the fill for disposal.

Health and Safety

Prior to the start of work, the subcontractors shall submit a Subcontractor Safety, Health, and Environmental Plan (SSHEP) along with specific Activity Hazard Analyses (AHAs) for tasks to be performed under this work plan. Work cannot commence until SSHEP and AHAs are reviewed, and comments have been addressed. Copies of the SSHEP and AHAs will be maintained at the support zone.

In addition, various plans will be implemented during the remedial investigation to control the management of materials generated during Site remediation.

A generic Community Air Monitoring Plan (**Appendix A** – NYSDOH Generic CAMP) prepared for this contract will be implemented for real-time monitoring for volatile organic compounds (VOCs) and particulates (i.e., dust) at the upwind and downwind perimeter of each designated work area during invasive activities on-site. These readings will be provided on a weekly basis with all exceedances reported to NYSDEC and NYSDOH the same day (or next business day if after hours) along with the following:

- Cause of exceedance
- Corrective actions implemented
- Efficacy of corrective actions

Field personnel will follow the NYSDOH Generic CAMP as further detailed in **Appendix A**, Division of Environmental Remediation (DER) -10 Fugitive Dust and Particulate Monitoring (NYSDEC 2010), and recommended response levels and action(s) will be implemented in the event of an exceedance.

Test pit locations will be adjusted in the field as needed to avoid proximity to on-site structures and unsafe site features.

Field Activities

Field activities will be conducted in accordance with the following documents included in the 2025 William Street Park PDI Work Plan, prepared by Parsons for the NYSDEC program:

- Project Safety, Health, and Environment Plan (2025 William Street Park PDI Work Plan **Appendix B** – PSHEP 2025;)
- Corning Quality Assurance Project Plan (2025 William Street Park PDI Work Plan **Appendix C** – QAPP 2023)

Investigation/sample location may be modified with concurrence from NYSDEC. All samples will be analyzed at an Environmental Laboratory Accreditation Program (ELAP) -accredited laboratory.

A Field Activities Plan (FAP) including all Standard Operating Procedures (SOPs) will be prepared by the NYSDEC call-out contractor, in accordance with green and sustainable best management practices (BMPs). These BMPs may include, but not be limited to, minimizing vehicle idling; and sending investigation derived waste (IDW) and other waste to local disposal facilities rather than trucking the waste to facilities located more distantly.

ABG Confirmatory Test Pits

Based on the results of the 2025 PDI (Parsons 2025b), additional subsurface investigations will be conducted at William Street Park utilizing test pits to evaluate the nature and extent of ABG where ABG was previously identified in PDI borings. Additionally test pits will be utilized to further evaluate grids where ABG was not identified in PDI borings. Due to the smaller size of the macro-core samplers and potential to miss ABG in these locations, test pits will be used since soil borings alone are not sufficient to identify ABG, as evidenced by the Study Area where excavations conducted during remedial actions found that ABG often extended to areas where previous borings showed no ABG existed,

At William Street Park, 19 test pits will be excavated to conduct this supplemental investigation (**Figure 1** and **Figure 2**). For locations where ABG was not identified in PDI borings one test pit will be advanced in the center of the cell (or as close to center as site conditions allow) to confirm that ABG is not present within that cell. For locations where delineation ABG boundaries between grids is needed test pits will be advanced perpendicular to the boundaries of cells with confirmed or suspected ABG, and cells with no known ABG. The point of these test pits will be to determine the extent of known ABG on site to inform remediation areas. Additionally, waste characterization samples will be collected from select test pits to evaluate waste disposal options. All test pits are planned to be 10 feet long by 2 feet wide by 4 feet deep (beneath planned excavation depth of 2 feet) Test pit dimensions may be modified in the field following discussion with the project manager and in concurrence with NYSDEC.

Test pits will be advanced using excavation equipment capable of reaching the maximum proposed depth. Track mats should be considered prior to accessing the proposed test pit locations to minimize potential disturbances to ground surfaces at the site. Excavated test pit soils shall be placed on impervious polyethylene plastic sheeting (minimum 8-mil thickness). During excavation, the operator will excavate thin layers of soil, and will be mindful of the potential for encountering any previously unidentified buried materials, containers, utilities, or combination thereof. Test pit sidewalls may be cut back to prevent sidewalls from crumbling or collapsing. Test pits will be advanced until reaching desired 4-foot depth, encountering groundwater, or sidewalls show signs of destabilization, whichever occurs first. No test pits will be advanced on hard surfaces on parks (driveways, parking lots, playing courts, playgrounds, etc.).

Soils excavated from test pits will be logged and visually assessed for the presence of ash, brick, and/or glass. Field personnel shall sketch test pit walls, log test pit lithology, and collect requisite soil samples. Photographs shall be taken of freshly exposed test pit sidewalls to document soil stratigraphy and other anomalies. Soils will be visually classified using the Unified Soil Classification System (USCS; ASTM International 2018). Soil

descriptions will be recorded in field notes or test pit logs. Any non-native material present in the excavated soils shall be noted and described (type, color, texture, moisture content, etc.) and any layer of fill material containing ash, brick, and/or glass shall be noted in field logs. Photographs of recovered soils and any fill materials containing ash, brick, and/or glass will be taken and included in the site characterization report. Excavated soils shall also be screened for the presence of VOCs with a photoionization detector (PID) and readings recorded on test pit logs and/or field book. The field team shall photograph the entirety of the test pit and surrounding site conditions.

Once the test pits have been excavated to their total depth and all requisite samples have been collected, the test pits shall be backfilled with the excavated material using the “first out, last in” methodology ensuring that deeper materials are placed back in the excavation first and the materials, such as topsoil, that were excavated first are backfilled last and on the top of the test pits. If ABG is encountered, this material will not be placed in the top 1 ft. to limit potential exposure. All test pits should be backfilled the same day as the excavation, or as soon thereafter as practical. Backfill should be placed in the bottom of the trench in one-foot lifts and compacted using the equipment bucket. Test pits shall not be left open or uncovered overnight. In the event the crews need to leave an open test pit unattended, the test pit shall be delineated with orange fencing and caution tape to prevent access. Following backfill, the disturbed area shall be mulched with straw mulch. The areas will be inspected regularly and if required, additional restoration activities will be conducted in the spring.

Excavating equipment will be decontaminated at the completion of the test pits at the Site using a high-pressure steam wash.

Prior to initiation of site activities, Dig Safely NY will be contacted to locate utility lines that enter and/or cross over areas where soil borings will be installed.

Archive Sampling

Archive samples will be collected and logged if ABG is encountered during site activities. Additionally, field personnel will document and photograph areas where ABG is encountered.

Waste Characterization Test Pits

To inform the nature of materials to be disposed of during remediation additional test pits will be advanced to collect TCLP samples. These samples will be used to determine waste profiles of materials to be excavated. Two samples will be collected from test being advanced in test pits that are confirmed to not contain any fill as described above. One additional test pit will be advanced in a location with suspected ABG, and two test pits will be advanced in locations identified as having ABG during the PDI investigation (Parsons 2025b). These locations are typically to the west side of the park (**Figure 2**). These test pits will be advanced and backfilled as described above.

References

Parsons. 2022. *Site Characterization Report William Street Park Site Number 851055*. Prepared by Parsons for the New York State Department of Environmental Conservation Division of Environmental Remediation. May 2022.

Parsons. 2025a. *Pre-Design Investigation Work Plan William St. Park Site(Site ID #851055) Corning, Steuben County, New York*. Prepared by Parsons for the New York State Department of Environmental Conservation Environmental Cleanup Program. Revision date July 2025.

Parsons . 2025b. *2025 Pre-Design Investigation Data Summary Report For William Street Park Site Number: 851055*. Prepared by Parsons for the New York State Department of Environmental Conservation Division of Environmental Remediation. September 2025.

FIGURES



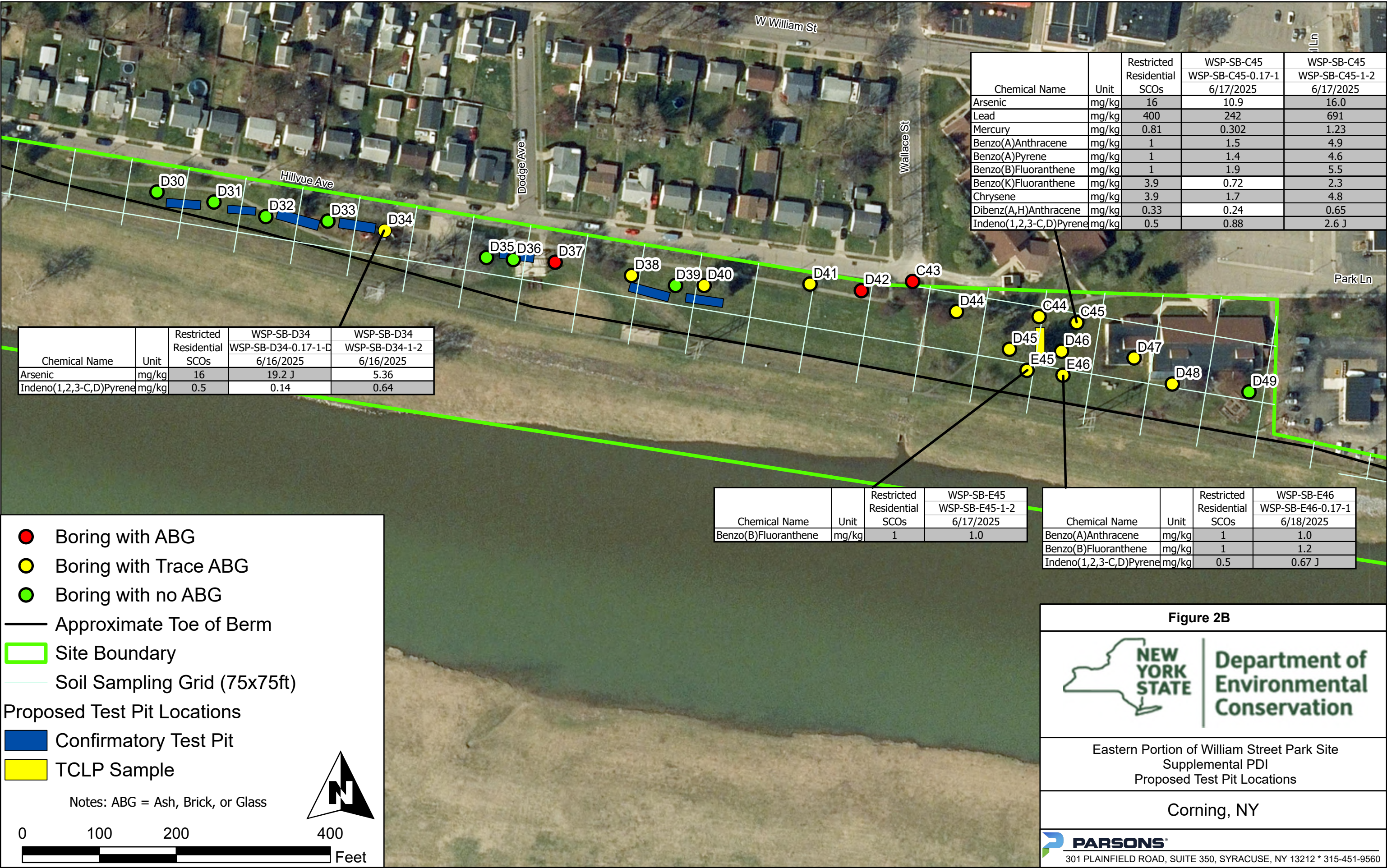


Figure 2B



Department of
Environmental
Conservation

Eastern Portion of William Street Park Site
Supplemental PDI
Proposed Test Pit Locations

Corning, NY



301 PLAINFIELD ROAD, SUITE 350, SYRACUSE, NY 13212 * 315-451-9560

Appendix A - NYSDOH Generic CAMP

New York State Department of Health Generic Community Air Monitoring Plan

A Community Air Monitoring Plan (CAMP) requires real-time monitoring for volatile organic compounds (VOCs) and particulates (i.e., dust) at the downwind perimeter of each designated work area when certain activities are in progress at contaminated sites. The CAMP is not intended for use in establishing action levels for worker respiratory protection. Rather, its intent is to provide a measure of protection for the downwind community (i.e., off-site receptors including residences and businesses and on-site workers not directly involved with the subject work activities) from potential airborne contaminant releases as a direct result of investigative and remedial work activities. The action levels specified herein require increased monitoring, corrective actions to abate emissions, and/or work shutdown. Additionally, the CAMP helps to confirm that work activities did not spread contamination off-site through the air.

The generic CAMP presented below will be sufficient to cover many, if not most, sites. Specific requirements should be reviewed for each situation in consultation with NYSDOH to ensure proper applicability. In some cases, a separate site-specific CAMP or supplement may be required. Depending upon the nature of contamination, chemical- specific monitoring with appropriately-sensitive methods may be required. Depending upon the proximity of potentially exposed individuals, more stringent monitoring or response levels than those presented below may be required. Special requirements will be necessary for work within 20 feet of potentially exposed individuals or structures and for indoor work with co-located residences or facilities. These requirements should be determined in consultation with NYSDOH.

Reliance on the CAMP should not preclude simple, common-sense measures to keep VOCs, dust, and odors at a minimum around the work areas.

Community Air Monitoring Plan

Depending upon the nature of known or potential contaminants at each site, real-time air monitoring for volatile organic compounds (VOCs) and/or particulate levels at the perimeter of the exclusion zone or work area will be necessary. Most sites will involve VOC and particulate monitoring; sites known to be contaminated with heavy metals alone may only require particulate monitoring. If radiological contamination is a concern, additional monitoring requirements may be necessary per consultation with appropriate NYSDEC/NYSDOH staff.

Continuous monitoring will be required for all ground intrusive activities and during the demolition of contaminated or potentially contaminated structures. Ground intrusive activities include, but are not limited to, soil/waste excavation and handling, test pitting or trenching, and the installation of soil borings or monitoring wells.

Periodic monitoring for VOCs will be required during non-intrusive activities such as the collection of soil and sediment samples or the collection of groundwater samples from existing monitoring wells. "Periodic" monitoring during sample collection might reasonably consist of taking a reading upon arrival at a sample location, monitoring while opening a well cap or overturning soil, monitoring during well baling/purging, and taking a reading prior to leaving a sample location. In some instances, depending upon the proximity of potentially exposed individuals, continuous monitoring may be required during sampling activities. Examples of such situations include groundwater sampling at wells on the curb of a busy urban street, in the midst of a public park, or adjacent to a school or residence.

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. 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 with 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 State (DEC and DOH) personnel to review. Instantaneous readings, if any, used for decision 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, then dust suppression techniques must be employed. Work may continue with dust suppression techniques provided that downwind PM-10 particulate levels do not exceed 150 mcg/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 mcg/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 mcg/m^3 of the upwind level and in preventing visible dust migration.

All readings must be recorded and be available for State (DEC and DOH) personnel to review.