**August 11, 2015**

**Summary of Proposed Plan for On-site Stabilization of Lead Contaminated Soils at the CoE ITC Construction Site, 727 East Washington St.**

*Lead contaminated soil in excess of the 5 mg/L RCRA hazardous waste regulatory limit was identified during pre-characterization soil sampling in ITC site sampling grid sections A2 and B1 (site map attached)*

1. Soil from the two grid sections (A2 and B1) where lead was found in excess of the RCRA limits will be excavated to a depth of 9 feet bgs (the maximum sampling depth).
   1. Each bucket of excavated soil will be screened with a PID and observed for odors and staining.  If PID readings in excess of 10 PPM or any odors or staining are observed in the soil, that soil will be staged separately and the University’s Environmental Health and Safety Services Office will be immediately notified.
   2. Excavated soil will also be visually examined by a NYS certified asbestos project monitor for signs of potentially friable asbestos containing debris.  If friable asbestos debris is observed, it must be handled and removed in accordance with the site’s existing asbestos variance.
2. The excavated soil will be placed onto adjacent grid sections that are covered with polyethylene (“poly”) sheeting.  The grid sections proposed for use in stabilizing the contaminated soil include A1, B2, C1, C2 and potentially a portion of A3 and B3 (Stabilization Area).  The soil from each of the excavated grids will be kept segregated within the Stabilization Area during the stabilization and staged there pending receipt of post-stabilization sampling results. Soil with elevated PID reading or visual staining or odors will be kept segregated but within the Stabilization Area during stabilization.
3. The stabilization material, Enviroblend, will be added to the excavated soil and mixed into the soil with an excavator bucket.  Enviroblend will be added at the ratio, deemed by the site’s environmental contractor, needed to sufficiently stabilize the lead to well below the 5 mg/L TCLP RCRA hazardous waste regulatory limit. The University is seeking a 90% stabilization rate if feasibly achievable.

*Note: the lead impacted soil is also presumed to contain asbestos debris, so stabilization will be performed by NYS Certified Asbestos Handlers, and the soil will be kept wet and handled in accordance with the existing site specific asbestos variance (from NYS Code Rule 56) issued by NYS Department of Labor.*

1. Composite samples of the stabilized soil will be obtained to confirm that the stabilization was successful.  Minimally one composite sample will be obtained of the stabilized soil from each grid section plus from any soil stabilized separately due to elevated PID readings, odors or staining. Additional soil samples may also be deemed necessary by the University EHSS staff or NYS DEC based on site conditions and observations.
2. Each post-stabilization composite soil will be analyzed for:
   1. TCLP metals
   2. TCLP VOCs
   3. TCLP SVOCs
   4. Any other parameter deemed necessary by NYS DEC, Syracuse University or Seneca Meadows Landfill.
3. The stabilized soil will remain staged in the Stabilization Area (grid sections A1, B2, C1 C2, and potentially part of A3 and B3) and covered with poly pending receipt of the post-stabilization sampling results.
4. Upon receipt of the post-stabilization sampling results:
   1. If the TCLP lead level in the stabilized soil is below the RCRA regulatory limit (<5 mg/L) and all other analytical results (i.e. total parameters) are acceptable to the University, NYS DEC and Seneca Meadows Landfill, the stabilized soil will be shipped off site for disposal at Seneca Meadows Landfill in accordance with applicable regulations and the site’s existing asbestos variance.
   2. If the TCLP lead levels in the stabilized soil are near or above the RCRA regulatory limit, additional stabilization with Enviroblend will be performed until the TCLP lead level in the soil is mitigated to below the RCRA regulatory limit or the University deems the stabilization unsuccessful and halts further stabilization efforts.  If the stabilization is deemed unsuccessful, the University will advise NYS DEC on an alternative plan for handling the lead impacted soils.
5. Post excavation “closure samples” of the grid sections (A2, B1) from which the lead impacted soil was excavated from will be obtained. Minimally one composite sample will be taken from the bottom of each grid section and one composite sample will be taken from each remaining side wall. Additional closure samples may be required at the discretion of the University’s EHSS staff and/or NYS DEC. Minimally, one composite sample must be obtained from each of the following (i.e. minimally a total of 5 closure samples):
   1. Bottom of A2
   2. Bottom of B1
   3. South wall of A2
   4. East wall of B1
   5. North wall of B1
6. Post excavation “closure samples” will be analyzed for:
   1. TCLP lead
   2. Total metals,
   3. Total VOCs
   4. Total SVOCs
   5. Any other parameter deemed necessary by NYS DEC or Syracuse University

