City of North Tonawanda
Department of Engineering
City Hall, 216 Payne Avenue
North Tonawanda, NY 14120-5493
www.northtonawanda.org

Dale W. Marshall, P. E.
City Engineer
Phone: **(716) 695-8565**
Fax: **(716) 695-8568**

January 29, 2013

Mr. Gregory Sutton
New York State Department of Environmental Conservation
270 Michigan Avenue
Buffalo, New York 14203

Re: Roblin Steel Soil Management Plan
North Tonawanda, New York

Dear Mr. Sutton:

The City of North Tonawanda (City) is currently developing the Roblin Steel Site that was remediated under a brownfields redevelopment grant through the 1996 New York State Clean Water/Clean Air Bond Act. In 2010, an extension of 10th Avenue, now known as Buffalo Bolt Way, was completed at the Site that provides water and sewer facilities to the newly subdivided parcels of land. Presently, the City has commitments for most of the available parcels within the Roblin Steel Site. The Site will include light industrial/commercial usage type properties. Residential redevelopment will not be permitted.

National Grid has proposed plans to install along the Buffalo Bolt Way Right of Way an underground electrical duct bank to provide commercial power for future properties. Enclosed is a drawing that illustrates the recently completed Buffalo Bolt Way project and the proposed electrical duct bank. This letter includes a proposed plan to manage excavated soils that are associated with the installation of National Grid's proposed work. The City requests the review of the proposed procedures as outlined in this letter.

During the site investigation activities, six areas of impacted soil were identified. These six impacted soil areas were excavated, removed and disposed off-site during the site remediation. Impacted soils containing polycyclic aromatic hydrocarbons (PAHs) and metals were sampled to delineate the extent of contamination and for waste characterization for off-site disposal. The impacted soils were excavated to a depth of 12-inches and removed as defined in the NYSDEC issued Record of Decision. Two of these impacted areas are in close proximity of the National Grid's proposed work. These impacted areas have been located on the enclosed drawing.

The remedial cover system that was used to fill the excavated impacted soil areas was 12-inches of crushed concrete that was recycled from demolished site concrete foundations. An additional 4-inches of topsoil was spread over the crushed concrete fill to provide vegetative soil cover. As stated in the Soil Management Plan for the Site: "Any breach of the cover system, including for the purposes of construction or utilities work, must be replaced or repaired using an acceptable borrow source free of industrial and/or other potential sources of chemical or petroleum contamination. The repaired area must be covered with clean soil and reseeded or covered with impervious product such as concrete or asphalt."

The National Grid proposed work is located, for the most part, outside of the remediated impacted area and cover system. However, since the National Grid proposed work is located in close proximity, or within the impacted areas, the City is submitting the following proposed procedure to be followed to ensure worker safety. Even though the cover system of the impacted area will be left intact and untouched, the City desires these precautionary measures.

1. Full time construction oversight provided by GHD Consulting Services, Inc. will be present during the excavation of the proposed electrical duct bank.

2. Workers are to be notified of the Site conditions with clear instructions regarding how the work is to proceed. The Site was impacted prior to remediation with semi-volatile chemical compounds that included polycyclic aromatic hydrocarbons (PAHs) and metals. Work performed at the Site will be performed in accordance with all applicable local, state, and federal regulations to protect worker health and safety. The potential exposure pathways include inhalation, absorption, ingestion and contact. Health effects from exposure to these chemical compounds are skin and respiratory irritants.

3. During excavation, removed soils will be inspected for visual and olfactory evidence of contamination. Inspection will include the use of Photo Ionization Detector (PID) equipment to monitor the excavation and soils.

4. Soil excavated at the Site is planned to be reused as backfill after the proposed electrical duct bank has been installed provided it contains no visual or olfactory evidence of contamination.

5. In the event of encountering impacted soil, excavated soil will be placed on a liner material. Excavated staged soil which appears to be visually impacted shall be sampled and analyzed. Analytical testing will include: Target Compound List (TCL), volatiles (VOCs), semi volatile organic compounds (SVOCs), pesticides, and PCBs, and TAL metals.

6. If analytical results indicate that the contaminants are present at concentrations above the NYSDEC Soil Cleanup Objectives and Cleanup Levels (SCOCLs) as presented in Tables 2-1, 2-2, and 2-3 of the Soil Management Plan, then soil will be removed for off-site disposal at a sanitary landfill.

7. If analytical results indicate that the contaminants are present at concentrations below the NYSDEC SCOCLs, then soil can be reused as backfill on-site.

Upon your review, the City requests a meeting to be held to discuss the National Grid's proposed work and excavation procedures.

Mr. Gregory Sutton
New York State Department of Environmental Conservation

January 29, 2013

Sincerely,

CITY OF NORTH TONAWNADA

Dale Marshall, P.E.
City Engineer

Cc: David Rowlinson, GHD Consulting Services, Inc.
Nancy Schott, National Grid

Enclosure