SPECTRA
ENVIRONMENTAL GROUP, INC.
ENGINEERING, ARCHITECTURE & SURVEYING, PC

February 16, 2016

Mr. Anthony Rivizzigno
Gilberti, Stinzio, Heintz & Smith, P.C.
On behalf of OCIDA
555 East Genesee Street
Syracuse, New York 13202

Subject: Roth Steel – Interim Remedial Measures Report (Revised)

Dear Mr. Rivizzigno:

Spectra Environmental Group, Inc. (Spectra), as Environmental Consultants for the Onondaga County Industrial Development Agency (OCIDA), has prepared this letter report to document the Interim Remedial Measures (IRM) conducted at the request of the New York State Department of Environmental Conservation (NYSDEC) at the former Roth Steel Site, located on Hiawatha Boulevard, in the City of Syracuse, New York (see **Figure 1**). This Report was originally submitted on 12/3/2015. On 2/2/16 DEC project manager Karen Cahill requested that we add several more photos to the Report. These photos with accompanying text revisions have been included.

On November 18, 2015 Spectra accompanied the NYSDEC regional project manager, Karen Cahill and two representatives from EPA, on an inspection of the site. During the inspection, Ms. Cahill noticed several leaking drums, abandoned automotive fuel tanks and miscellaneous debris outside of Building 6 (see **Photo 1**, **Photo 2**, and **Photo 3**). At that time Ms. Cahill requested an immediate 24 hour emergency response to mitigate the problem. Spectra immediately contacted three area waste contractors to meet on the site the following day.

Bid Walk

On November 19, 2015 Spectra hosted a bid walk to identify and explain the IRM tasks and scope of work to three potential contractors. The contractors who participated in the walk through were; OP-Tech, EPS of Vermont, and Action Technical Services. Ms. Karen Cahill from the New York State Department of Environmental Conservation (NYSDEC) and Mr. Richard Jones representing the New York State Department of Health (NYSDOH) were present during the bid walk.

During the bid walk the area around Building 6, unconsolidated 55 gallon drums, assorted plastic containers, assorted aerosol cans, abandoned automotive fuel tanks, abandoned propane tanks, assorted paint cans and other miscellaneous debris were identified. The scope of work included the consolidation and staging of the aforementioned items from out and around Building 6 into

Building 5. The contractors were requested to submit a bid within the next 24 hours to properly consolidate the identified drums and other assorted material.

The walk through on November 18 also identified a 55 gallon drum inside Building 4 filled with capacitors which may contain PCBs (see **Photo 4**). The area also contained possible asbestos insulation spread around the room (see **Photo 5** and **Photo 6**). The contractors all acknowledged that these could not be removed until an asbestos assessment was conducted. An assessment of this type would take several weeks at best to complete. Given that the material in question was not exposed to the environment, and confined within the building, Ms. Cahill determined that, since there was minimal exposure risk, not to include the capacitors in this emergency action at this time.

On November 21, after reviewing the three submitted bids, Spectra selected Action Technical Services (Action-Technical) of Syracuse, New York.

Interim Remedial Measures

On November 23rd and 24th, Action Technical Services mobilized to the site to conduct the IRM activities under Spectra oversite. An assessment of the area around Building 6 identified that a number of 55-gallon drums were filled or partially filled with what appeared to be lubricants and oils, 2 fuel tanks, aerosol cans, paint cans and assorted plastic containers. All items were inspected for competency, quantified, categorized, and staged within Building 5 (see **Photo 7**). Two additional leaking drums were identified outside of Building 1 and were incorporated into the interim remedial measure plan (see **Photo 8**).

Any 55 gallon drum that was found to be incompetent was over-packed within a steel 85 gallon drum (photo 8). At total of nineteen (19) 55 gallon drums were over-packed and staged together within Building 5 (see **Photo 9**). A number of the abandoned 55 gallon drums around Building 6 along with various containers were observed to be open and to contain collected rainwater. The collected rainwater was transferred into reconditioned 55 gallon drums. A total of seven (7) reconditioned drums were used to containerize all observed collected rainwater. These drums were staged together within Building 5 (Photo 9).

Thirty-one (31) other sealed 55 gallon drum that were found to be competent were staged "as-is" along with other competent drums within Building 5 (see **Photo 10**). A competent drum is one that, based on the contractor's experience, is not sufficiently dented or rusted, or otherwise leaking so as to compromise the drums structural integrity. Ultimately, the final decision on the competency of a drum lies with the transporter.

Numerous small containers were observed on site. The containers varied greatly from small quantity oil storage, propane tanks, paint cans to medium sized horizontal fuel tanks. These containers were identified, transported to Building 5, categorized with like products and staged on polyethylene sheeting within the building. Approximately 100 containers (plastic oil containers, 5 gallon buckets, paint cans, automotive tanks, propane tanks etc.) were identified and staged within Building 5. Aerosol cans were collected and placed into a reconditioned 55 gallon drum with other like material (See **Photo 11** and **Photo 12**).

The total inventory of drums, tanks and assorted items stored in Building 5 is as follows:

Various small containers placed on poly sheet - ~ 100
55 gallon (partially filled) liquid intact drums – 31
85 gallon steel over-packed drums – 19
55 gallon water-filled drums – 7
Horizontal fuel tanks – 2
55 gallon drum filled with aerosol cans – 1
55 gallon drum labeled as mineral spirits – 1
55 gallon drum filled with PPE material – 1
Automotive fuel tank - 1

After securing all the required material, the garage doors in Building 5 were closed and Action-Technical demobilized.

Next Steps

By securing the leaking drums and other material into Building 5, the requirements of the emergency interim remedial action were satisfied. With respect to the staged material, the next step is to characterize the contents of the drums and assorted material. Many drums with unknown material will require sampling. Once characterized, a licensed hauler will be contracted for final disposal in accordance with regulation.

Sincerely,

SPECTRA ENVIRONMENTAL GROUP, INC.

Frank R. Peduto, P.E.
Project Manager

cc: D. Queri, OCIDA
K. Lynch, NYSDEC
K. Cahill, NYSDEC

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Figure 1 – Property and Building Layout

Photo 1 – Yard area around building 6 – Abandoned automotive fuel tank, discarded drums and miscellaneous debris

Photo 2 – Yard area near building 6 – Numerous abandoned 55 gallon drums and various debris

Photo 3 – Yard area near building 6 – Drum containing mineral spirits

Photo 4 – Building 4 – potential PCB containing capacitors within building 4

Photo 5 – Building 4 – Potential asbestos containing materials within building 4

Photo 6 – Building 4 – Potential asbestos containing materials within building 4

Photo 7 – Building 5 (foreground) & Building 4 (background) – facing North

Photo 8 – Yard near building 1 – Over-packing of 55 gallon drum into 85 gallon drum

Photo 9 – Building 5 – Nineteen over packed 85 gallon drums (background) and seven 55 gallon water drums (foreground) condensed and housed within building 5

Photo 10 – Building 5 – 31 partially full 55 gallon drums (center) and a single drum of aerosol containers (right) condensed and housed within building 5

Photo 11 – Building 5 – 13 empty containers (right) and 2 horizontal fuel tanks (left) condensed and housed within building 5

Photo 12 – Building 5 – Assorted plastic containers, propane tanks, paint cans and automotive fuel tank condensed and housed wit