October 20, 2025

Ms. Karen Cahill
Project Manager
New York State Department of Environmental Conservation
Division of Environmental Remediation, Region 7
5786 Widewaters Parkway
Syracuse, NY 13214-1867

RE: Response to NYSDEC Comments and Revised Site Cover Pre-Design Sampling Plan
800 Hiawatha Blvd. West
NYSDEC Brownfield Cleanup Program (BCP) Site No. C734083
JMT Job No. 16-S0140N

Dear Ms. Cahill:

On behalf of the Onondaga County Industrial Development Agency (OCIDA), JMT of New York, Inc. has prepared the following responses to NYSDEC's October 8, 2025 comment letter on the July 29, 2025 Site Cover Pre-Design Sampling Plan for the 800 Hiawatha Blvd. West Site in Syracuse, NY (BCP Site No. C734083). NYSDEC comments are presented first, followed by the OCIDA/JMT response. The corresponding Revised Site Cover Pre-Design Sampling Plan is attached to this letter for your review and approval.

Comment 1: Introduction, first sentence: The acronym for Soil Cleanup Objective (i.e., SCO) must be provided and the site referred to as "800 Hiawatha Boulevard West Site" rather than the "Former Roth Steel Site".

Response 1: These modifications have been made to the work plan.

Comment 2:

Background and Proposed Samples:

- The first paragraph states that there is a rectangular area south of MW-10A that has a solid concrete surface that meets the site cover requirement. This is not an accurate statement given that the concrete has not been inspected for integrity, nor has it been sampled for PCBs. Two samples of Automobile Shredder Residue (ASR) present on the surface of the concrete were collected on June 21, 2003, by Ramboll on behalf of the DEC. PCBs were detected at 6.8 ppm and 33 ppm in these samples. The Remedial Work Plan states that the ASR east of the concrete pad will be removed from this area and taken for offsite disposal, however, since ASR is present on the surface of the concrete pad, the concrete must be sampled to ensure that PCBs concentrations are below the Industrial Use PCB Soil Cleanup Objective of 25 ppm. Procedures and locations for these samples must be provided in the work plan.
- The third sentence must be rewritten as follows: "Additional surface soil sampling will be conducted at 13 locations in OU-2 to further define the lateral extent of the soil cover (see Figure 1). Surface soil samples will be collected from 0 to 2 inches and from 2 to 12 inches.

Response 2: The first paragraph has been modified to reflect DEC's request. Per discussion with DEC on October 14, 2025, inspection and sampling of the "L-shaped" concrete south of MW-10A and will be deferred as part of the Self-Implementing Cleanup and Disposal Notification process with USEPA. Those procedures and sample locations will not be included in this revised sampling plan. The sentence, "The first paragraph states that there is a rectangular area south of MW-10A that has a solid concrete surface that meets the site cover requirement" has been removed for the plan. Regarding the second bulleted item, the requested modifications were made to the first two sentences of the third paragraph.

Comment 3: Quality Control: A field blank must also be collected each day on the shovel, hammer and chisel used for soil sampling.

Response 3: Acknowledged. Field blanks have been added to the work plan.

Comment 4:

Figure 1:

- OU-2 must be labeled; and
- The labels for samples collected by JMT in 2017 and in 2023 must be prefaced with the year they were collected so as not to confuse them with historical sample locations. For example, "B19" must be replaced with "(17) B-19" and "B24" must be replaced with "(23) B-24".

Response 4: Acknowledged. The July 29, 2025 work plan shows OU-2 as the green area in Figure 1. It was labeled "OU-2 Remediated Area" in the legend. In the revised work plan, the green symbol label is now "OU-2" in the legend and a "Note 3" has been added to the figure to indicate that OU-2 has been remediated. The sample label adjustments to Figure 1 now reflect the collection year per the comment.

Comment 5: All analytical data received must be validated and submitted to EQuIS.

Response 5: Acknowledged. The July 29, 2025 work plan stated that Category B deliverables will be reviewed and submitted to EQuIS by a third-party data validator before or at the time of the site's draft Final Engineering Report is submitted to NYSDEC. The BCP certificate of completion (COC) process presentation dated May 1, 2025 indicates that all EQuIS data needs to be submitted by October 1. It is assumed that this date is consistent for a 2026 COC.

Comment 6: All PCB-contaminated soil excavated on this site will be subject to USEPA approval per TSCA Part 761.

Response 6: Acknowledged.

Comment 7: Ecc list: Please remove Maureen Schuck and Scarlett McLaughlin (NYSDOH) from this list and add Sara Bogardus, NYSDOH Region 7 Chief. Additionally, please add Joshua Cook, DEC Regional Hazardous Waste Remedial Engineer to the list.

Response 7: Acknowledged. The new recipient list will be used moving forward.

If you have any comments or questions regarding these responses or the revised sampling plan that follows, please contact me at 518-782-0882 or e-mail ywinters@jmt.com.

Sincerely,

JMT of New York, Inc.

Yaicha Winters

Yaicha Winters, PhD, REP
Project Manager

Attachment

ecc: R. Petrovich, OCIDA
R. Schoeneck, OCIDA
J. Davis, Esq., Barclay Damon
S. Wagh, NYSDOH
Sara Bogardus, NYSDOH
M. Sheen, Esq., NYSDEC
J. Cook, NYSDEC
G. Priscott, NYSDEC
A. Iglesias, USEPA
E. Kavvadias, USEPA
A. Park, USEPA
J. Tallman, JMT

REVISED SITE COVER PRE-DESIGN SAMPLING PLAN

800 HIAWATHA BLVD. SYRACUSE, NEW YORK BCP SITE NO. C734083

Prepared for:
OCIDA
335 Montgomery Street
Syracuse, NY 13202

Submitted to:
NYSDEC Region 7
5786 Widewaters Parkway
Syracuse, NY 13214-1867

Prepared by:
JMT of New York, Inc.
19 British American Blvd. W
Latham, NY 12110

Submitted: July 29, 2025

Revised: October 20, 2025

Introduction

A Site Cover Pre-Design Sampling Plan for Brownfield Cleanup Program (BCP) Site No. C734083 located at 800 Hiawatha Blvd. West in Syracuse, New York was submitted on July 29, 2025. The plan was prepared in accordance with the Response Letter (Resubmittal of the Revised Analysis of Alternatives/Remedial Work Plan and Comment Responses) dated December 4, 2023. Sampling proposed in the plan is intended to verify site cover limits for Industrial Use Soil Cleanup Objectives (SCOs) and determine the vertical extent of contamination at one location. The New York State Department of Environmental Conservation (NYSDEC) provided comments dated October 8, 2025 in response to the July 29, 2025 plan. This Revised Site Cover Pre-Design Sampling Plan incorporates NYSDEC's feedback.

Background and Proposed Samples

In accordance with the selected remedy presented in the Analysis of Alternatives and Remedial Work Plan (AARWP), the proposed engineering controls will entail "hot spot" soil removal and capping portions of the site with clean soil. Areas of the site that exceed the Industrial Use SCOs in the top 1-foot will be covered with one foot of clean soil, unless they are already covered by concrete. Figure 1 shows the proposed "hot spot" removal and preliminary proposed cover areas. As requested by the NYSDEC, Figure 1 also shows the locations of both historical and proposed surface (0 to 1 foot deep or less) soil samples at the site. The only exceptions to this are two planned hot-spot removals which are based on subsurface soil PCB data, as noted on the figure.

The portion of OU-1 south of OU-2 is planned for future Industrial Use. As such, a PCB SCO of 25 ppm for the surface soil (top 1 foot) and for subsurface soil is applicable, considering NYSDEC thresholds. This cleanup level also satisfies the Environmental Protection Agency (EPA) threshold of 25 ppm for "low occupancy" areas per 40 CFR Part 761. Additional surface soil sampling will be conducted at 13 locations in OU-1 to further define the lateral extent of the soil cover (see Figure 1). Surface soil samples will be collected from 0 to 2 inches and 2 to 12 inches. These samples will be analyzed for polychlorinated biphenyls (PCBs), polyaromatic hydrocarbons (PAHs), and metals via EPA Methods 8082, 8270, and 6010, respectively.

It is anticipated that the OU-1 area northwest of OU-2 will remain undeveloped with restricted access (i.e., fenced). As such, NYSDEC Industrial Use and USEPA "low occupancy" SCOs are applicable. According to CP-51 and 40 CFR 761.61, a level of 25 ppm for PCBs is acceptable for both surficial and subsurface soils, provided that access is limited and individual occupancy is restricted to less than an average of 6.7 hours per week. That is the anticipated scenario for this area. Based on the existing sampling data, Industrial Use SCOs are not exceeded in the top 1 foot. However, PCBs are 38 ppm at sample location (16) 2-4 at a subsurface depth of 35 to 50 inches. JMT proposes to collect samples for PCB analysis only at (16) 2-4 from 12 to 24 inches and 24 to 35 inches to determine if these intervals exceed the 25 ppm threshold and need to be removed during the remedy implementation. This will result in two PCB samples.

Quality Control

The proposed soil sample number, positions, and analyses are consistent with those requested by NYSDEC. Samples will be analyzed by a New York State Department of Health (NYSDOH) Environmental Laboratory Approval Program certified laboratory. Quality control samples (duplicate, matrix spike, and matrix spike duplicate) will be collected at a rate of 1 per 20 samples, resulting in two sample sets. A field blank will also be collected each day for decontaminated equipment

(e.g., shovel, hammer, chisel, as applicable) used for soil sampling. The laboratory will report the results in a Category B deliverable.

Sampling Technique

Prior to sampling, JMT will stake out the proposed sample locations using a survey grade GPS unit. Soil samples from the 0-2" interval will be collected using a shovel and, when necessary, a hammer and chisel will be used to break up heavily compacted soils. A flighted soil auger and drill will be used to achieve deeper intervals for proposed samples. Soil from each subsurface interval will be captured by a plastic bucket surrounding the auger bit. A photoionization detector (PID) will be used to determine the presence of volatiles emitted from the sample interval. Subsequently, the sample will be homogenized in a clean, stainless steel mixing bowl and spoon. Sampling equipment will be decontaminated between each sample interval with Alconox detergent, and the sampler will don new nitrile gloves before each sample. Excess soil from each location will be placed back into its associated hole.

For consistency with and continuation of prior sample collection identification methods, the 26 surface soil samples for final cover limits will be labeled as SS6 through SS18 followed by sample depth (e.g., SS6 0-2" and SS6 2-12"). The two subsurface samples collected northwest of OU-2 will be labeled as (16) 2-4 (12-24") and (16) 2-4 (24-35"). Sample labels will be filled out with indelible ink and recorded on the chain of custody. Field notes will also be recorded during this sampling activity.

Samples will be placed into laboratory-provided bottleware, placed in a clean cooler with ice, and transported to a Pace Analytical service center for transport to the laboratory. JMT will develop a site-specific Health and Safety Plan prior to this field activity.

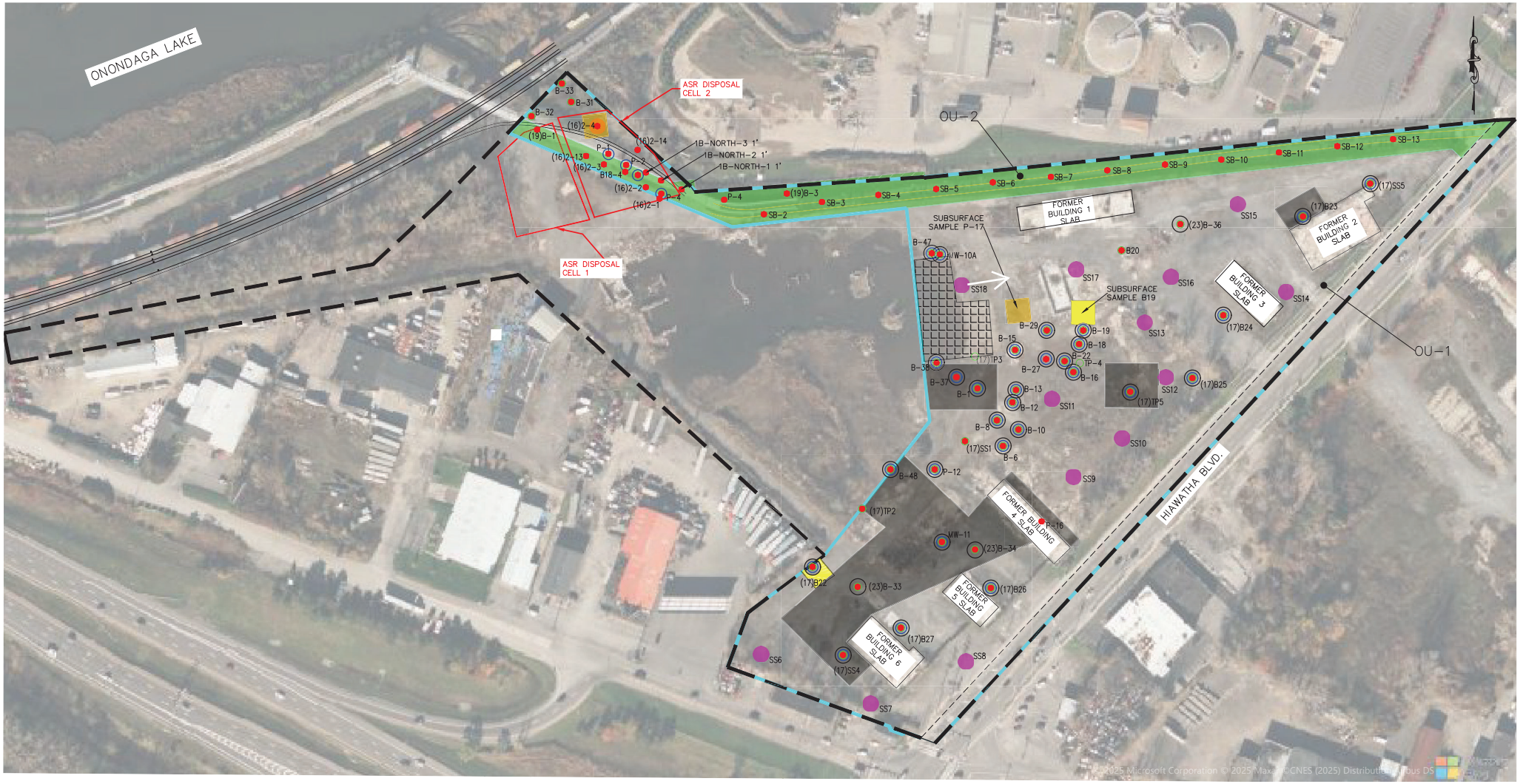
Reporting

The results of this sampling program will be provided in a combined report / Self-Implementing Cleanup and Disposal Notification (SICDN) to NYSDEC and USEPA. The NYSDEC portion will provide all new data (SVOCs, metals, PCBs) with a figure showing the final proposed site cover extent. The site cover design will be certified by a NYS Professional Engineer. The USEPA SICDN portion will provide a summary of the site's PCB data as well as a narrative of the planned remedial components applicable to meet PCB cleanup regulations. All results will be compared to appropriate NYSDEC Soil Cleanup Objectives/USEPA Standards.

Schedule

JMT can mobilize for sample collection within two weeks of agency approval of this work plan. The NYSDEC would be notified at least five business days in advance of the field sampling. Sample collection is anticipated to take two and a half days. Standard laboratory turnaround time is approximately 10 days, beginning the day after receipt by the laboratory. The combined report / SICDN will be prepared by JMT within four weeks of receiving the laboratory's report. Please note that Category B deliverables will be reviewed and submitted to EQuIS by a third-party data validator before or at the time of the site's draft Final Engineering Report is submitted to NYSDEC.

FIGURE



LEGEND

- APPROXIMATE WASTE CELL LOCATIONS
- PCB SOIL SAMPLE (TOP 1 FOOT)
- METALS SOIL SAMPLE (TOP 1 FOOT)
- VOC SOIL SAMPLE (TOP 1 FOOT)
- SVOC SOIL SAMPLE (TOP 1 FOOT)
- PROPERTY BOUNDARY
- BCP BOUNDARY
- OU-2
- PROPOSED SOIL CAP – 1FT THICK (INDUSTRIAL USE)
- EXISTING CONCRETE
- PRE-DESIGN SAMPLE LOCATIONS (0-2", 2-12") PCBs, METALS, SVOCs
- PRE-DESIGN SAMPLE LOCATION (12-24", 24-35") PCBs ONLY

PROPOSED PCB EXCAVATION AREAS

- PCBs BETWEEN 10 PPM AND 25 PPM
- PCBs BETWEEN 25 AND 50 PPM

0 40 80
1"=80'

NOTES:

1. The buildings were removed in 2018. Only slabs remain.
2. All areas within the BCP boundary, excluding OU-2, represent OU-1.
3. OU-2 has been remediated.

JMT
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Sample Locations
800 Hiawatha Blvd
Syracuse, New York

CITY OF SYRACUSE ONONDAGA CO., NY

PROJ. No.:	16140	DATE: 10/2025 (Revised)	SCALE:	1"=80'	DWG. NO._____	FIGURE	1