Ambient Environmental, Inc.
Building Science and EHS Solutions
NYS Certified WBE,
SBA EDWOSB & DBE

April 6, 2021

Karen A. Cahill
Division of Environmental Remediation
NYSDEC Region 7
615 Erie Blvd W
Syracuse, NY 13204
315-426-7432 (Office)
315-289-6788 (Mobile)

Via Email: Karen.Cahill@dec.ny.gov

RE: Interim Remedial Measures (IRM) Work Plan
Waterside Commons BCP Site: C734106
129 West Genesee Street, Village of Fayetteville, Town of Manlius
Onondaga County, New York
Ambient Project No. 200130ENVA

Dear Ms. Cahill:

Per your request as stated in your email dated 20 January 2021, Ambient Environmental, Inc. (Ambient) is providing this Interim Remedial Measures (IRM) Work Plan for the subject Site. This IRM Work Plan describes the approach and procedures to be followed in the event that Underground Storage Tanks (USTs), buried drums, Oil/Water Separators (OWS), other buried features containing significant contamination, and any associated significantly-contaminated soil is encountered in the course of implementing the NYSDEC-approved Remedial Investigation Work Plan (RIWP) for the subject Site.

NYSDEC DER-10: Technical Guidance for Site Investigation and Remediation contemplates the use of IRMs during the implementation of RIWPs. Per DER-10, IRM "means activities to address both emergency and non-emergency site conditions, which can be undertaken without extensive investigation and evaluation, to prevent, mitigate or remedy environmental damage or the consequences of environmental damage attributable to a site, including, but not limited to, the following activities: construction of diversion ditches; collection systems; drum removal; leachate collection systems; construction of fences or other barriers; installation of water filters; provision of alternative water systems; the removal of source areas; or plume control.". Section 5.5 of DER-10 also addresses the removal of USTs as an IRM. IRMs will comply with DER-10.

PROJECT SUMMARY

The Waterside Commons BCP Site (the Site) is located at the corner of West Genesee and Highbridge Street in Fayetteville. The Site consists of one tax parcel (018.-06-09.1) covering 0.297 acres. The Site, which is currently vacant, formerly included a dry cleaner. The structure

associated with that business was demolished in late fall 2019. Previous Site use included a gas station/automobile repair (dating back to the early 1900s). Historic use of the Site by previous owners resulted in environmental contamination including the assumed presence of Underground Storage Tanks (USTs) as evidenced by a recent Ground Penetrating Radar (GPR) survey and Site observations; the presence of a cistern containing dry cleaning waste (recently removed); and the documented presence of petroleum-related compounds and chlorinated solvents in soil and groundwater.

The estimated locations of potential USTs and other buried features are shown on the attached Figure. Additional details are present in the NYSDEC-approved RIWP.

SUMMARY OF ANTICIPATED IRMS

Based on historic records and the results of a GPR survey, Ambient anticipates that several USTs, along with a fuel pump island an associated piping, may be present at the Site. Contaminated soil may be encountered near those features. The RIWP describes test pit excavations to be performed in suspected areas of underground features, as shown on the attached Figure. If tank, piping, other buried feature and associated significantly-contaminated soil is encountered during test pit excavation, they will be removed in accordance with this IRM Work Plan.

Any USTs will be addressed as summarized below.

- NYSDEC will be immediately notified if USTs are encountered;
- remove the tanks including all contents and properly dispose of same, including removal and proper disposal of any sludge in the tanks, removing and stockpiling clean soil, removing and cleaning tanks, and tank disposal;
- sample the excavation sidewalls and floor to document remaining petroleum residuals in soil (if any);
- backfill the resulting excavation with certified clean fill (crushed stone, gravel or equivalent), compaction with excavation equipment, and finishing top eight inches with crushed stone;
- prepare an ‘interim’ closure report for submission to NYSDEC.

All soil will be scanned with a PID during excavation work and soils remaining at the base and sidewalls of the excavation will also be scanned with a PID. Confirmation soil samples will be collected and analyzed for TCL Volatile Organic Compound (VOC), TCL Semi-Volatile Organic Compound (SVOC), TAL Metals and PCBs at the completion of excavation to document the concentrations of those analytes, if any, left in place at the conclusion of soil removal activities. All sample collection and analyses will be performed in accordance with the RIWP. The number of soil samples to be collected will depend on the extent of the excavation.

If significantly-contaminated soil is encountered, Ambient will perform the following:

- notify NYSDEC;
- remove and stockpile any contaminated soil (as determined by observations and PID readings) as possible without compromising the integrity of adjacent structures;
- sample any stockpiled soil for proper disposal characterization;

- loading, transportation and disposal of any petroleum-contaminated soil that may be removed.

The excavation will be backfilled with clean material upon completion of excavation activities. Clean material may consist of clean 'overburden' removed to access the USTs and clean fill from an off-site source. Overburden material will be deemed 'potentially clean' if it does not exhibit staining and/or a strong odor and does not exhibit sustained PID readings exceeding 25 PPM. Overburden will be stockpiled on Site during excavation activities. Stockpiled soil will be sampled prior to re-use to confirm that it meets the requirements for clean backfill. A Request for Import/Reuse Fill form will be submitted and approved by NYSDEC prior to bringing any backfill material to the Site, and prior to using any excavated Site soil as backfill.

NOTE- Detailed UST removal specifications are provided as an attachment. The specifications provide a detailed approach to UST removal and the approach to be followed if contaminated soil is encountered.

BURIED DRUMS AND OTHER BURIED FEATURES

Ambient does not anticipate encountering buried drums at this Site. However, if buried drums are encountered, they will be handled in a similar manner as USTs as described in the attached specifications. In summary, buried drums will be:

- Described and photographed in-place;
- Carefully removed from the ground in a manner to avoid damage or leaks;
- Placed in a secure, bermed, plastic-lined staging area and covered with plastic sheeting;
- Numbered and labeled with date and description (detailed descriptions of any drums or other buried features will be entered into the project field book).

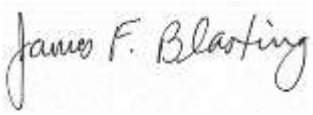
Drum contents will be sampled and profiled, and drums will be properly overpacked as needed and disposed off-site in accordance with applicable regulations. Areas from which drums are removed with be sampled as described for USTs in the attached specifications.

Concrete vaults, cisterns, etc. will also be addressed in a manner similar to the approach use for USTs, as described in the attached specifications. Any concrete exhibiting significant staining or evidence of contamination will be treated similar to contaminated soil, as stated in the attached specifications.

CLOSING

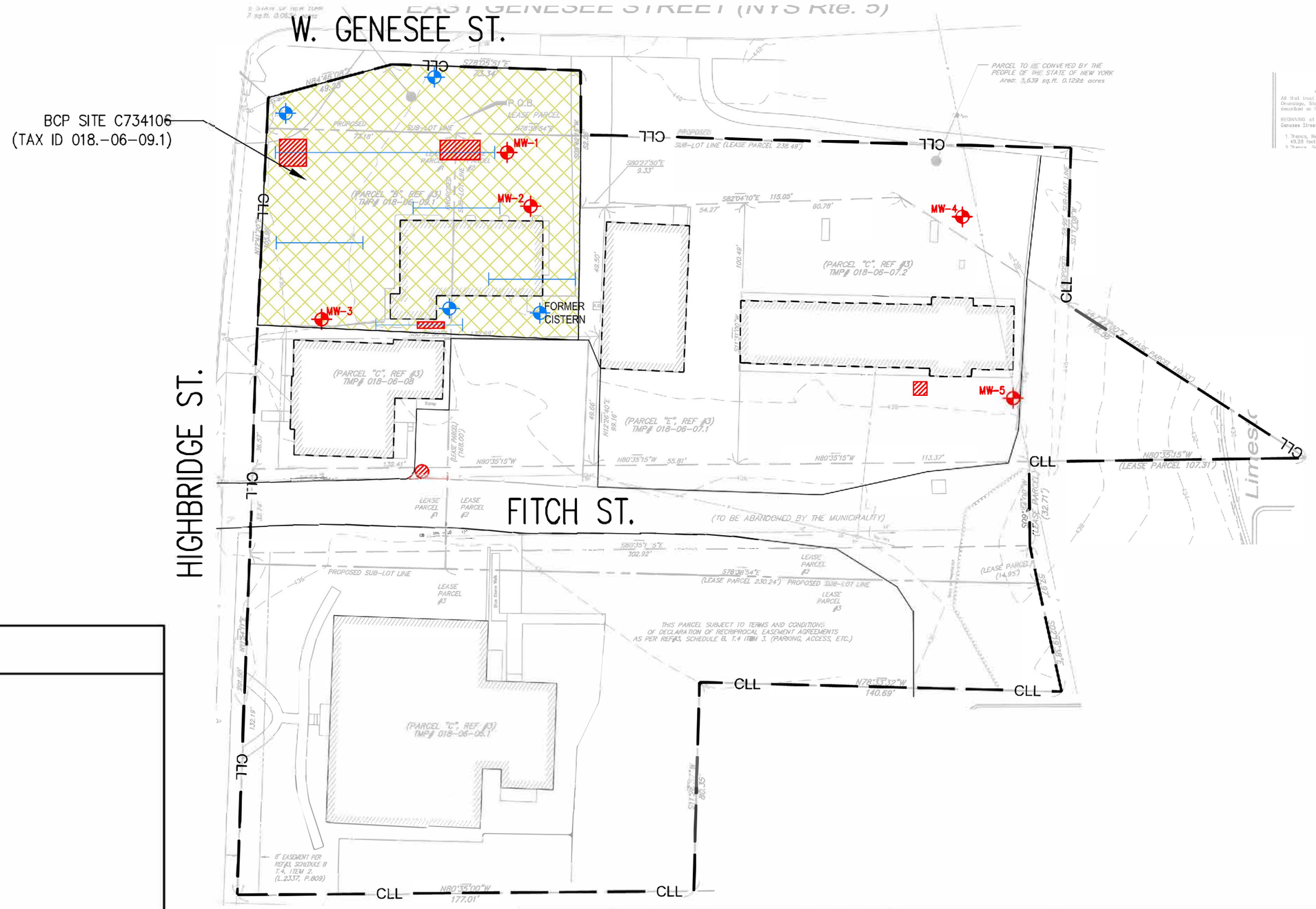
Ambient appreciates the opportunity to provide this IRM Work Plan. If you have any questions regarding this document, please contact me at (315) 263-3388 or by email (jimb@ambient-env.com). Thank you.

Respectfully;
Ambient Environmental, Inc.



James F. Blasting, PG
Senior Consultant

Attachments



KEY

- CLL — APPROXIMATE PROJECT LIMITS
- BCP SITE LIMITS
- GPR ANOMALY (2020)
- BUILDING REMOVED 2019
- 2005 S&W SOIL BORING/MONITORING WELL
- 2021 RI ACTIVITIES
- 2021 RI TEST PIT
- 2021 RI SOIL BORING/MONITORING WELLS

N

0 40 80

SCALE IN FEET

PREPARED FOR:
AMBIENT ENVIRONMENTAL, INC.
PREPARED BY:
KEPLINGER FREEMAN ASSOCIATES

DRAWING TITLE: *RI SITE ACTIVITIES* — *PROJECT # 200103ENVA*	DRAWING NUMBER: IRM-1
PROJECT NAME: *W. GENESEE ST., FAYETTEVILLE N.Y.* — *WATERSIDE COMMONS*	DRAWN BY: VER; CHECKED: SLF; DATE: 02/25/20; PROJECT: 40024

UNDERGROUND STORAGE TANK REMOVAL

SUMMARY

Any underground storage tanks (USTs) encountered during the Waterside Commons BCP Remedial Investigation (RI), as described in the NYSDEC-approved RI Work Plan, will be removed and properly handled in accordance with NYSDEC DER-10 and these specifications. Any encountered UST and associated piping, vent piping, and associated structures will be removed. The qualified Environmental Consultant (EC) responsible for implementing the RI will also be responsible for the property excavation, staging and disposal of contaminated soil; handling contaminated groundwater if encountered in an excavation; and backfilling excavations and restoration of the area associated with the removal of underground tanks and piping.

The EC will be responsible for documenting field observation, conducting a contamination assessment if warranted, proper collection and handling of soil samples, and analysis of tank excavation soils for tank closures. The EC will advise the Requestor and NYSDEC on environmental matters.

A NYSDOH-approved laboratory will conduct analyses of liquids, soils and materials for disposal as submitted by the EC.

EXECUTION

Notify NYSDEC upon encountering any USTs.
Remove underground storage tanks, liquid, sludge and associated waste, including soil removal as needed.
Determine if contamination from the USTs is present.
Notify NYSDEC if contamination is encountered;determine the extent of contamination; and properly manage the removal, handling, sampling, profiling, storage, transportation and disposal of the contaminated material.
Properly transport and dispose of all contaminated soil, water, sludge, solids, waste, etc. in accordance with applicable regulations.
Restore the excavated area with new materials.

UNDERGROUND STORAGE TANK LIQUID REMOVAL

Remove all liquid to its lowest draw-off point.
Drain and flush piping into the tank (one or two gallons of water should be sufficient).
Pump out the liquid below the draw-off point (tank bottom).
Use an explosion-proof hand pump, vacuum pump or vacuum truck.
Pump out the entire tank bottom including the remaining product layer.
Pump motors and suction hoses must be bonded to the tank or otherwise grounded to prevent electrostatic ignition hazards.
Test liquids and tank bottoms to be disposed as required by the disposal facility.
Dispose of liquids and tank bottoms in accordance with NYSDEC, NYSDOT and local regulations.
Provide documentation of liquid and tank bottom disposal.

UNDERGROUND STORAGE TANK CLEANING AND DISPOSAL

Inert the interior atmosphere before extracting the tank from its location.
Spills or drips shall be contained to prevent contamination of soils during removal.
Excavate to the top of the tank and stockpile soil.
In the event contaminated soil is encountered, remove and temporarily stockpile the material as specified herein.

Excavation around existing UST.

- Excavate down to expose upper half of tank.
- During excavation, exercise extreme caution in order to maintain the integrity of the UST.
- EC will check tank and piping excavations for contamination using field instruments.
- Place excavated material in a separate stockpile on polyethylene sheeting and covered with polyethylene sheeting as directed, pending disposal or use as backfill.

Disconnect all vent, suction and inlet lines, monitoring and all other tank fixtures.

Temporarily plug all tank openings, complete the excavation, and remove the tank, placing it in a secure location on polyethylene sheeting (6-mil minimum).

Tank must be blocked to prevent movement.

Excavate to uncover existing piping associated with the tank.

- Remove all underground piping as accessible.
- Remove all vent piping.
- Do not rupture tank or pipelines.

Measure levels of combustible vapors and oxygen, and initiate ventilation of the tank, if needed.

- Ventilate tank using a small gas exhauster until the vapor concentration is reduced to 10 percent or less of the lower explosive limit.
- Oxygen content shall range from 19.5 to 23.5 percent.
- Cut access ports for cleaning into tank after vapor and oxygen concentrations have met the requirements noted above.

Cleaning of the tank shall include mopping, scraping, and sweeping the interior of the tank. If applicable, comply with OSHA confined space entry regulations.

Collect, contain and place residuals in a United States Department of Transportation (NYSDOT) approved type 17H, 200 L (55 gallon) capacity drums for transport and disposal.

Ensure final vapor and oxygen concentration are within the requirements noted above before proceeding to cut and dismantle the tank for disposal.

Transport and dispose of dismantled tank, piping, and associated appurtenances to an approved disposal facility in accordance with NYSDEC and NYSDOT requirements.

Obtain disposal documentation for tanks, piping, and associated appurtenances.

REMOVED TANK AREA ASSESSMENT

Sample soil in the proximity of the tanks in accordance with NYSDEC DER-10 and other applicable NYSDEC guidance.

- Do not enter excavation, the excavator bucket can be used for gathering samples.
- Decontaminate bucket as needed prior to collecting each sample.
- Five soil samples will typically be collected from each tank location: one sample from each of the sidewalls, and one sample from the bottom. Fewer or more samples may be required based on observations, field screening and the size of the excavation. *Soil sampling will adhere to the following guidance: one sample per every 900 square feet of excavation floor, and one sample*

per every 30 linear feet of sidewall.

Restore site in accordance with RI requirements. **NOTE:** A Request for Import/Reuse Fill form must be submitted and approved by NYSDEC prior to bringing any backfill material to the Site.

CONTAMINATED SOIL

Notify NYSDEC if contaminated soils are encountered.
Excavate, segregate, stockpile, and protect soils with evidence of possible contamination (based on evidence of visible staining, odors, or by field instrumentation readings) in accordance with NYSDEC DER-10 and other applicable NYSDEC guidance.

- Such soils shall be placed on polyethylene sheeting (6-mil minimum), bermed to prevent run-off, covered with same type of polyethylene sheeting to keep precipitation off of the staged soil, and;
- the cover shall be secured to keep the pile dry.

Test contaminated soils as required by the disposal facility for waste profiling purposes.

Remove all contaminated soil from the site, haul and dispose of it in accordance with NYSDEC and NYSDOT protocols.

Obtain contaminated soil disposal documentation.

CONTAMINATED WATER

If water in the UST excavation appears contaminated (sheen, free product, elevated PID readings) the contractor shall utilize a vac truck to evacuate all water and dispose of off-site at a properly permitted disposal facility.

A groundwater evaluation will be conducted as appropriate and in accordance with the RI Work Plan.