June 18, 2021

New York State Department of Environmental Conservation
Region 7 Office
615 Erie Boulevard West
Syracuse, New York 13204
Attn: Mr. Michael Belveg

RE: Excavation of the Stormwater Line in the Roadway of South Clinton Street, in Syracuse, New York
NYSDEC BCP Site No. C734144
CHA Project No.: 059294.001

Dear Mr. Belveg:

On behalf of Ranalli/Taylor Street LLC, CHA Consulting, Inc (CHA) has prepared this letter work plan to provide you with information on the infrastructure upgrades that are anticipated to take place through the southern end of South Clinton Street. This portion of the street was recently added into the Former Coyne Textile Facility Brownfield Cleanup Agreement (Site No. C734144). Work is anticipated to start as early as Friday, June 18, 2021 with the excavation of exploratory test pits to identify the location of an 8-inch water line, that is anticipated to be encountered approximately six feet below ground surface (bgs). Additional work is anticipated to include the replacement of the water main, installation of two underground stormwater lines with associated structures, existing sanitary infrastructure repairs, and the potential installation of two 5-inch lines for future underground electrical service. These activities are anticipated to occur throughout June and July 2021. Paragon Environmental Construction (PEC) has been retained to conduct all ground intrusive work and CHA Consulting, Inc. (CHA) has been retained to oversee the work as it relates to the Brownfield property.

Soil will be continuously screened with a photoionization detector (PID) during intrusive activities. Although it is anticipated that the majority of the soil will be placed back into the excavation, any soil that appears to be grossly contaminated will be stockpiled in a designated area, on poly sheeting and ultimately disposed of off-site at a regulated and permitted facility. Groundwater will, if encountered, will be pumped into a vac-truck and shipped off-site to a regulated facility. Waste characterization samples as required by the landfill/disposal facilities, will be collected as necessary.

Air monitoring will be performed during ground intrusive activities in accordance with the New York State Department of Health (NYSDOH) *Generic Community Air Monitoring* Plan. During all intrusive activities, the community air monitoring plan (CAMP) included in Attachment 1,

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will be implemented. The CAMP includes measures for monitoring both fugitive dust and organic vapors at one upwind and one downwind station of the active work zone. In addition, the CAMP identifies action levels during construction and appropriate mitigation methods to address any exceedances of the action levels.

All non-disposable equipment will be decontaminated at the conclusion of intrusive activities and prior to demobilizing equipment from the Site. Appropriate precautions will be taken throughout the intrusive process to limit contact with contaminated soil. Only parts of equipment that have contacted Site soil and/or groundwater will require decontamination with either a non-phosphate detergent and potable water mixture, followed by potable water and distilled water rinse, or a high-pressure steam cleaner.

A summary of work completed along with CAMP data will be provided to NYSDEC and NYSDOH in the Final Engineering Report (FER). Please note, the purpose of the work mentioned above is to upgrade existing infrastructure within South Clinton Street and is not considered to be the final site remedy.

If you have any questions, please do not hesitate to contact me at (315) 257-7154.

Sincerely,

Samantha J. Miller

Samantha J. Miller, P.E.
Project Engineer IV

Attachment

ecc: Mr. Joshua Cook, NYSDEC: joshua.cook@dec.ny.gov
Ms. Angela Martin, NYSDOH: angela.martin@health.ny.gov
Ms. Gail Cawley, JMA Wireless: gcawley@jmawireless.com

Attachment 1

Community Air Monitoring Plan

COMMUNITY AIR MONITORING PLAN

Stormwater Pipe Replacement
South Clinton Street
NYSDEC BCP Site No. C734144
Syracuse, New York

Air monitoring at the Site will be performed during all intrusive activities where there is a potential to contact existing soil/fill in accordance with the NYSDOH Generic CAMP, and Appendix 1A and 1B of DER-10. All air monitoring will be conducted on a real-time basis for particulates (i.e. dust) and organic vapors.

The primary contaminants of concern associated with the Site are solvents, which are VOCs. Particulates and VOCs will be monitored concurrently within a CAMP station containing a DustTrak and photoionization detector (PID), or similar.

Air monitoring readings will be uploaded in real time and made available for review by both the NYSDEC and NYSDOH. Any exceedances that may occur will be addressed and recorded in the daily field log. Air monitoring will be performed at the perimeter of the work zone at upwind location and one downwind location. The direction of wind will be monitored daily to determine upwind and downwind location.

Enclosures will be provided for remote air monitoring stations to reduce potential weather-induced performance issues. The enclosures will be located in areas where they are not subject to damage from vehicular traffic and there is minimal potential for tampering in publicly accessible areas. Additionally, all intake ports on the instruments will be equipped with rain guards/shields to minimize the potential for water intrusion.

The CAMP is not intended for use in establishing action levels for worker respiratory protection. Rather, its intent is to provide a measure of protection for the downwind community (i.e., off-Site receptors including residences and businesses and on-Site workers not directly involved with the subject work activities) from potential airborne contaminant releases as a direct result of demolition and redevelopment construction work activities. Reliance on the CAMP should not preclude simple, common-sense measures to keep VOCs and dust to a minimum around the work areas. Supplements to the CAMP may be required depending on the nature of the planned intrusive activities. The action levels specified herein require increased monitoring, corrective actions to abate emissions, and/or work shutdown. Additionally, the CAMP helps to confirm that work activities did not spread contamination off-Site through the air.

"Continuous monitoring" will be required for all ground intrusive activities and during the excavation of contaminated soils. Ground intrusive activities include, but are not limited to, soil/waste excavation and handling.

Particulate Monitoring, Response Levels, and Actions

Particulate monitoring must be employed during the handling of contaminated soil or when activities on Site may generate fugitive dust from exposed waste or contaminated soil. Remedial activities may also include the excavation, grading, or placement of clean fill.

Particulate concentrations will be monitored continuously at the upwind and downwind perimeters of the exclusion zone at temporary particulate monitoring stations (one placed upwind and one placed downwind). The particulate monitoring will be performed using real-time monitoring equipment capable of measuring particulate matter less than 10 micrometers in size (PM-10) and capable of integrating over a period of 15 minutes (or less) for comparison to the airborne particulate action level. The equipment will be equipped with a remote telemetry alarming system that will send a message to field personnel to indicate exceedance of the action level. In addition, fugitive dust migration will be visually assessed during all work activities.

1. Reasonable fugitive dust suppression techniques will be employed during Site activities which may generate fugitive dust.

2. Particulate monitoring will be employed during the handling of contaminated soil or when activities on Site may generate fugitive dust from contaminated soil. These control measures are not considered necessary for the placement of clean fill.

3. Particulate monitoring will be performed using real-time particulate monitors and will monitor particulate matter less than ten microns (PM10) with the following minimum performance standards:
   a. Objects to be measured: Dust, mists or aerosols;
   b. Measurement Ranges: 0.001 to 400 mg/m³ (1 to 400,000 µg/m³);
   c. Precision (2-sigma) at constant temperature: +/- 10 g/m³ for one second averaging; and +/- 1.5 g/m³ for sixty second averaging;
   d. Accuracy: +/- 5% of reading +/- precision (Referred to gravimetric calibration with SAE fine test dust (mass median diameter (mmd)= 2 to 3; g-2.5, as aerosolized);
   e. Resolution: 0.1% of reading or 1g/m³, whichever is larger;
   f. Particle Size Range of Maximum Response: <0.1 to 10 microns (µm);
   g. Total Number of Data Points in Memory: 10,000 or greater;
   h. Logged Data: Each data point with average concentration, time/date and data point number
   i. Run Summary: overall average, maximum concentrations, time/date of maximum, total number of logged points, start time/date, total elapsed time (run duration),

STEL concentration and time/date occurrence, averaging (logging) period, calibration factor, and tag number;

j. Alarm Averaging Time (user selectable): real-time (1-60 seconds) or short-term exposure limit (STEL) (15 minutes), alarms required. Personnel conducting air monitoring must be immediately notified of any alarms by remote sensors, text messaging, or other similar equipment. Utilizing periodic checks of instrumentation in alarm mode only is not acceptable monitoring practice.

k. Operating Time: 48 hours (fully charged NiCd battery); continuously with charger;

l. Operating Temperature: 0 to 50˚ C (14 to 122˚ F); and

m. Operating Humidity: 10 to 99 percent Relative Humidity.

4. Particulate levels will be monitored immediately downwind of the excavation and integrated over a period not to exceed 15 minutes. Consequently, instrumentation shall require necessary averaging hardware to accomplish this task.

5. The action level will be established at 150 µg/m³ (15 minutes average). While conservative, this short-term interval will provide a real-time assessment of on-Site air quality to assure both health and safety. If particulate levels are detected in excess of 150 µg/m³, the upwind background level must be confirmed immediately. If the working Site particulate measurement is greater than 100 µg/m³ above the background level, additional dust suppression techniques must be implemented to reduce the generation of fugitive dust and corrective action taken to protect Site personnel and reduce the potential for contaminant migration. Corrective measures may include increasing the level of personal protection for on-Site personnel and implementing additional dust suppression techniques. Should the action level of 150 µg/m³ continue to be exceeded work must stop and Project Managers from CHA, New York State Department of Environmental Conservation (NYSDEC), and NYSDOH must be notified. The notification shall include a description of the control measures implemented to prevent further exceedances.

6. It must be recognized that the generation of dust from contaminated soil that migrates off-Site, has the potential for transporting contaminants off-Site. There may be situations when dust is being generated and leaving the Site and the monitoring equipment does not measure PM10 at or above the action level. Since this situation has the potential to allow for the migration of contaminants off-Site, it is unacceptable. While it is not practical to quantify total suspended particulates on a real-time basis, it is appropriate to rely on visual observation. If dust is observed leaving the working Site, additional dust suppression techniques must be employed.

7. All readings will be recorded and be available for review by the NYSDEC, NYSDOH and County Health personnel, if requested.

The following techniques have been shown to be effective for the controlling of the generation and migration of dust during construction activities:

- Wetting equipment and excavation faces;
- Spraying water on buckets during excavation and dumping;
- Hauling materials in properly tarped or watertight containers;
- Restricting vehicle speeds to 10 mph; and
- Covering excavated areas and material after excavation activity ceases.

When techniques involving water application are used, care must be taken not to use excess water, which can result in unacceptably wet conditions. Using atomizing sprays will prevent overly wet conditions, conserve water, and provide an effective means of suppressing the fugitive dust.

The evaluation of weather conditions is necessary for proper fugitive dust control. When extreme wind conditions make dust control ineffective, as a last resort remedial actions may need to be suspended. There may be situations that require fugitive dust suppression and particulate monitoring requirements with action levels more stringent than those provided above. Under some circumstances, the contaminant concentration and/or toxicity may require additional monitoring to protect Site personnel and the public. Additional integrated sampling and chemical analysis of the dust may also be in order. This must be evaluated when a health and safety plan is developed and when appropriate suppression and monitoring requirements are established for protection of health and the environment.

VOC Monitoring, Response Levels, and Actions

VOCs will be monitored at one upwind and one downwind location at the perimeter of the active work zone. VOCs will be monitored on a continuous basis, concurrently with fugitive dust monitoring. The monitoring work should be performed using a 10.6 eV PID. The equipment will be calibrated at least daily for the contaminant(s) of concern or for an appropriate surrogate. The equipment will be capable of calculating 15-minute running average concentrations, which will be compared to the levels specified below.

1. If the ambient air concentration of total organic vapors at the downwind perimeter of the work area or exclusion zone exceeds 5 parts per million (ppm) above background for the 15-minute average, work activities must be temporarily halted and monitoring continued. If the total organic vapor level readily decreases (per instantaneous readings) below 5 ppm over background, work activities can resume with continued monitoring.

2. If total organic vapor levels at the downwind perimeter of the work area or exclusion zone persist at levels in excess of 5 ppm over background but less than 25 ppm, work

activities will be halted, the source of vapors identified, corrective actions taken to abate emissions, and monitoring continued. After these steps, work activities can resume provided that the total organic vapor level 200 feet downwind of the exclusion zone or half the distance to the nearest potential receptor or residential/commercial structure, whichever is less - but in no case less than 20 feet, is below 5 ppm over background for the 15-minute average.

3. If the organic vapor level is above 25 ppm at the perimeter of the work area, activities will be shutdown.

4. All 15-minute readings will be recorded and be available for State (NYSDEC and NYSDOH) personnel to review if requested. Instantaneous readings, if any, used for decision purposes will also be recorded.