



April 29, 2022

Ms. Karen A. Cahill
Assistant Engineer, Division of Environmental Remediation
New York State Department of Environmental Conservation
615 Erie Boulevard West
Syracuse, New York 13204

**RE: Tree Removal Work Plan
Bowers Business Park, NYSDEC Site # C734145**

Dear Ms. Cahill:

The following work plan details the proposed activities that shall be utilized to facilitate the removal of cut trees within the Brownfield Cleanup Program (BCP) area at the Bowers Business Park, located in the Town of Dewitt, Onondaga County (NYSDEC Site #C734145).

PROJECT HISTORY

In March of 2022, Bowers Business Park, LLC (BBP) retained the services of a logging company to cut down trees in preparation for remedial investigation and anticipated remediation activities. In April 2022, BBP notified NYSDEC (via email) of their intent to physically remove the downed trees utilizing an excavator to lift and move the trees to a location where they could be loaded and removed from the site. During this activity, NYSDEC conducted a site visit and determined that the activity was creating an unanticipated soil disturbance and stopped the work activities until a work plan could be submitted and approved by NYSDEC.

PROPOSED ACTIVITIES

The following activities are proposed to complete the removal of the trees from the BCP area. Work activities shall be performed under the oversight of a Professional Engineer, as required by NYSDEC regulations:

Tree Removal Activities: BBP proposes to complete the removal of these trees utilizing a tracked excavator, equipped with a grapple, to lift and place the cut trees onto trucks for removal from the BCP area. In order to limit the amount of soil disturbance created by the movement of the excavator, a strategy has been developed to minimize trackage across the site and ultimately the associated soil disturbance (see Attachment A: Figure 1). This route of movement shall be adhered to, except for excursions necessary to remove several standing trees that overhang adjacent property / roadways or in instances where deviation is necessary for worker health & safety purposes.

Temporary Erosion Control: At the end of each day, disturbed soils shall be covered with a layer of straw mulch to help prevent the movement of soils via wind action or resulting from precipitation. If there is not enough straw present, the exposed soils shall be temporarily covered with polyethylene sheeting until which time straw is brought to site and utilized for coverage purposes.

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Site Access: All access to the work area shall be through a single access point designated on the attached figure.

Community Air Monitoring: During days when work is being conducted, BBP shall conduct community air monitoring for particulates only. Monitoring shall consist of two (2) stations (1 upwind and 1 downwind), which shall continuously monitor particulate levels and record the 15-minute time weighted average concentrations throughout the work shift. BBP shall have a representative on-site to monitor this instrumentation. Data shall be downloaded daily, reviewed, and a summary of the results shall be conveyed to the NYSDEC Project Manager daily noting any observed exceedances and the appropriate response actions.

Decontamination Procedures: Equipment that comes into contact with site soils will be decontaminated prior to being removed from the site. The detailed decontamination procedures are further described in Attachment B: Excavator Decontamination Procedures. Rinsates, personal protective equipment (PPE), and solids will be drummed and stored within a fenced area.


If you have any questions regarding this plan, please do not hesitate to reach out to us directly to discuss the proposed procedures.

Sincerely,
Asbestos & Environmental Consulting Corporation



James Saxton
Senior Project Manager

Lakeside Engineering

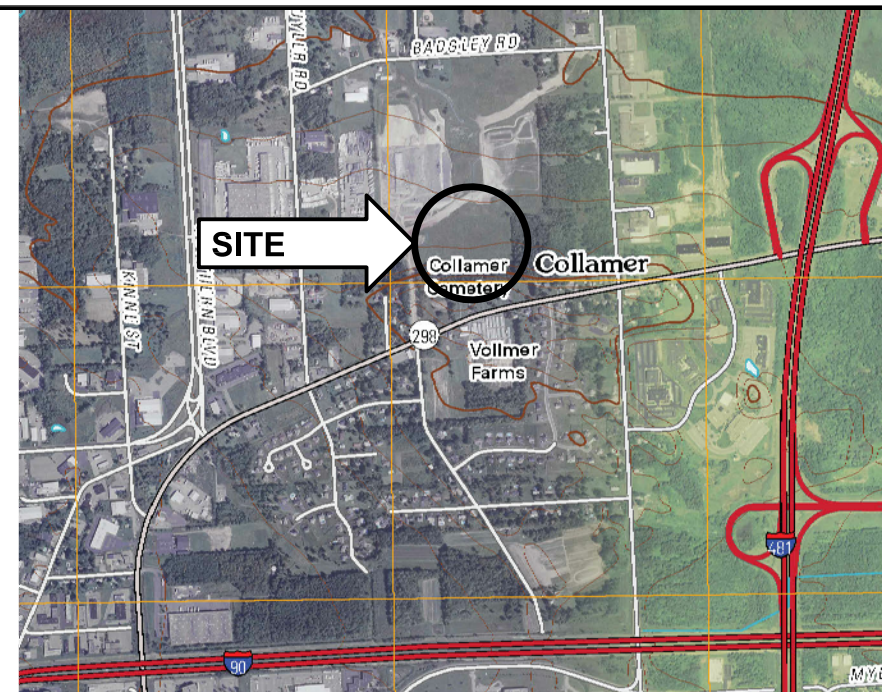
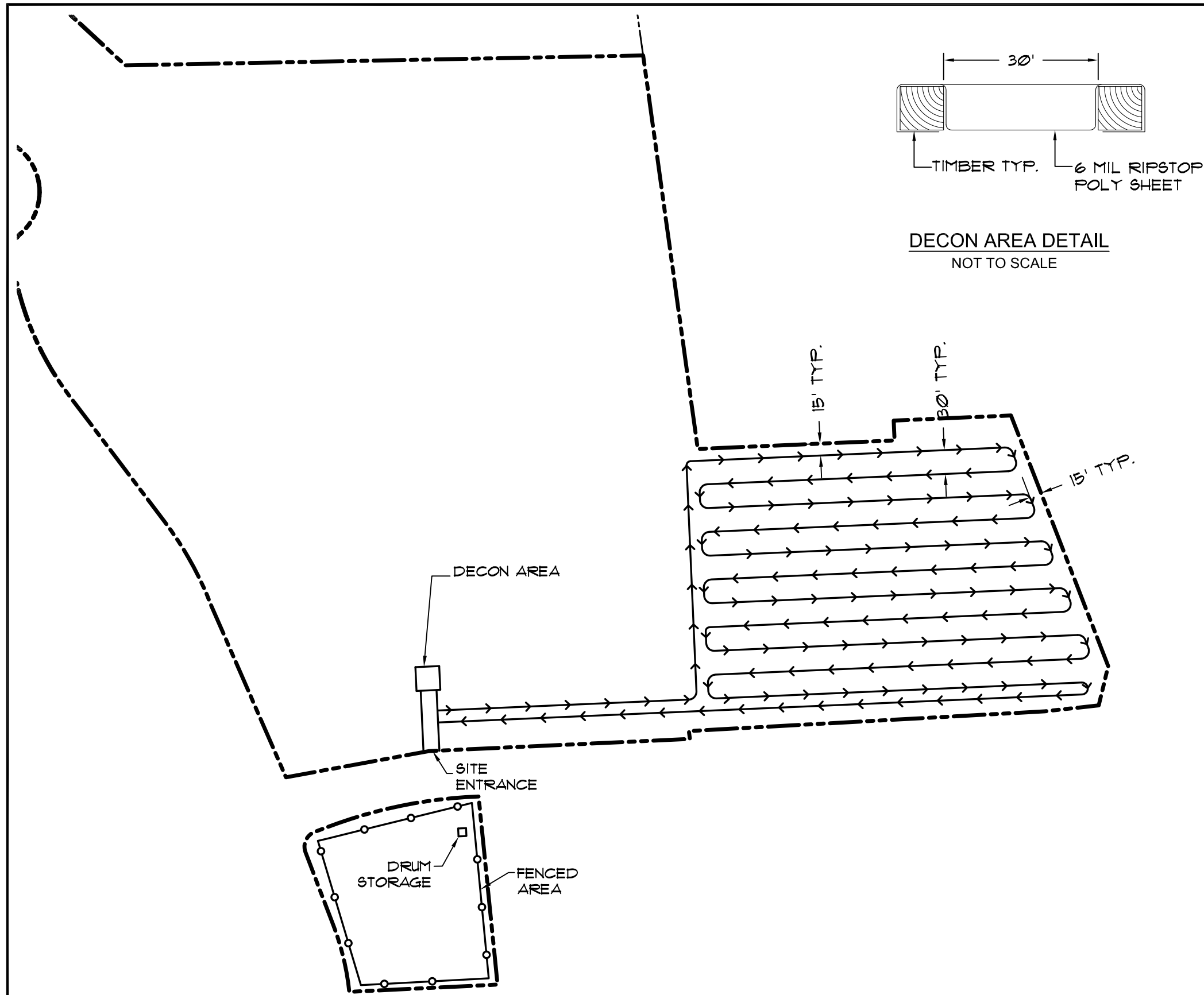


Robert G. Harner, PE
President

Attachment A: Figure 1
Attachment B: Excavator Decontamination Procedures

Attachment A

Figure 1

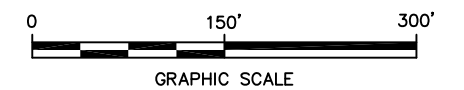


SITE LOCATION



LEGEND:

- PROPERTY LINE
- PATH OF TRAVEL
- ○ ○ ○ ○ FENCE



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PROJECT NO. 20-044
DRAWN: APR. 2022
DRAWN BY: WF
CHECKED BY: JS
FILE NAME:

TREE REMOVAL ROUTING

BOWERS BUSINESS PARK
CANADA DRIVE, TOWN OF DEWITT
ONONDAGA COUNTY, NEW YORK

FIGURE

1

Attachment B

Excavator Decontamination Procedures

EXCAVATOR DECONTAMINATION PROCEDURES

Excavator Decontamination Procedures - Prior to the removal of the excavator from the BCP area, the following procedures shall be performed for decontamination purposes:

- a) A decontamination pad shall be constructed consisting of 6-mil, rip-stop, polyethylene sheeting placed upon a bermed area. Berms may consist of timbers, rolls, or soil such that decontamination fluids stay retained on the pad for subsequent placement in drums.
- b) Once the excavator has entered the decontamination area, hand-scrape / remove bulk amounts of dirt utilizing applicable tools (shovels, rods, etc.).
- c) Once the bulk of the dirt has been removed from the excavator, cover the entire surface with concentrated or industrial-strength detergent / surfactant and let it sit for a minimum of 15 minutes on the surfaces.
- d) After the soaking period has elapsed, scrub surfaces with a brush or pad to further loosen adhered dirt, such that the brush / pad is passed over each square foot (or less) a minimum of one time.
- e) After the visible dirt has been removed, rinse the excavator using high-pressure steam, such that the steam is passed over each square foot (or less) a minimum of two times.
- f) After the excavator has been steam-cleaned, cover the entire surface of the excavator with hexane or a product designed for removal of PCBs (Less Than 10 PCB Cleaner, Pipe X, or similar equivalent), and let it sit on the surfaces for a minimum of 15 minutes.
- g) After the soaking period has elapsed, scrub surfaces with a brush or pad, such that the brush / pad is passed over each square foot (or less) a minimum of one time.
- h) After the excavator has been cleaned, rinse utilizing high-pressure steam, such that the steam is passed over each square foot (or less) a minimum of two times.
- i) At each stage, capture and properly containerize and/or manage wash water and decontamination rinsates.

Confirmatory Wipe Sampling: Standard wipe tests will be collected to determine if the excavator has been thoroughly cleaned. At a minimum, samples shall be collected from each track, the excavator bucket, and cab area. Upon completion, the wipe samples shall be shipped to a NYSDOH-certified laboratory for PCB analysis. Results will be compared to a clearance value of less than or equal 10 ug/100 cm².

If laboratory results indicate that re-cleaning is necessary, Steps e) through i) of the Excavator Decontamination Procedures will be followed, and the excavator will be re-sampled in accordance with this procedure. This process will continue until satisfactory clearance results are obtained.