



LAKESIDE ENGINEERING

Engineering | Design | Permitting

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October 28, 2022

Karen A. Cahill
Project Manager
Division of Environmental Remediation
New York State Department of Environmental Conservation – Region 7
615 Erie Boulevard West, Syracuse, NY 13204-2400

Re: Bowers Business Park
Site C734145
Soil Pile 2 characterization – Remedial Investigation Work Plan Addendum
Lakeside Project No.: 20210323.12

Dear Ms. Cahill:

On behalf of Bowers Business Park, LLC. We are submitting the following narrative and attachments regarding characterization of Soil Pile-2 for the Bowers Business Park site (NYSDEC # C734145). This addendum is presented in further response to your letter dated September 6, 2022, specifically the comment on Soil Pile #2 provided in the Remedial Investigation Work Plan (RIWP).

To comply with 40 CFR 761, AECC proposes the following approach for Investigation/classification of soils contained within Soil Pile-2 at the Bowers Business Park site:

- To date, fifteen (15) soil samples have been collected from Soil Pile-2 consisting of surface samples of the pile. Analytical results show PCB concentrations ranging from 0.046 to 25.67 ppm at 0-2” below the vegetative layer and 0.08 to 8.4ppm at a depth of 12” below the vegetative layer.
- The pile is approximately fourteen feet high. An additional four (4) soil borings will be completed atop the pile and will be field located near the corners of the “flat” area. These four borings will be advanced to a depth of approximately two feet below the bottom of the soil pile into native soils beneath. Soil samples will be collected for laboratory analysis (for PBCs Only) at intervals every 2’ below top of pile (BTOP) until the existing grade of the surrounding area is reached. Once the original grade is encountered, PCB soil samples will be collected at 0-2” below the native vegetative layer (BNVL), at 1’ BNVL, and at 2’ BNVL (see figure 1, attached). The location of original grade will be determined using survey equipment to establish the height of the pile at each sample location and thereby determine the depth to original grade.
- Sample intervals 4’, 8’, and 12’ BTOP will be analyzed initially, while the 2’, 6’, and 10’ BTOP intervals will be held pending the receipt of the 4’, 8’, and 12’ BTOP results. Additional samples will be analyzed only if results of the first group indicate PCB concentrations more than 25 ppm. These results will be used to subdivide the pile into sections for disposal.

- Additional samples below the pile will be collected for laboratory analysis as required in the RIWP for general site characterization. Again, once the bottom of the pile is reached, the 0-2” and 1’ BNVL in-situ samples will be analyzed for total PCBs only. The 2’ BNVL sample will be held and analyzed only if the 1’ BNVL sample indicates total PCB concentrations greater than or equal to 1 ppm. Further, based on the results of analysis to date, we are not proposing to analyze for VOCs, SVOCs, pesticides/herbicides, or metals. To date none of these contaminant classes have been encountered at the site except for one detection for DDE have been observed at concentrations that exceed the commercial, or in most cases, unrestricted SCOs.

40 CFR 761.347 First level sampling – waste from existing piles requires the collection of 8-samples to characterize a pile for disposal. Between previously collected samples and what is proposed via this narrative and attachments, this approach will generate 27-39 total samples, which we believe is more than adequate to accurately characterize the pile for disposal.

Please review and advise if this approach is acceptable to you.

If you have any comments or questions, please call me at 607-725-5824.

Respectfully,

Lakeside Engineering



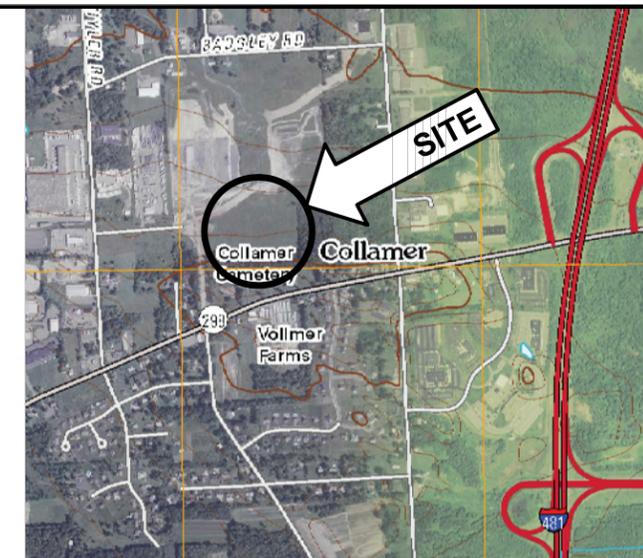
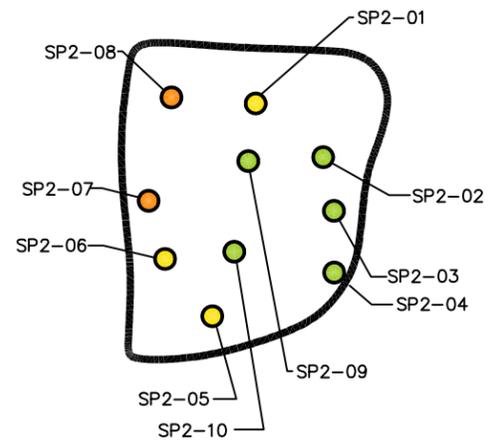
Robert G. Harner, PE, CPESC, LEED-AP
President

Attachment 1 – Figure 1 – Lot 2 Existing Soil Pile

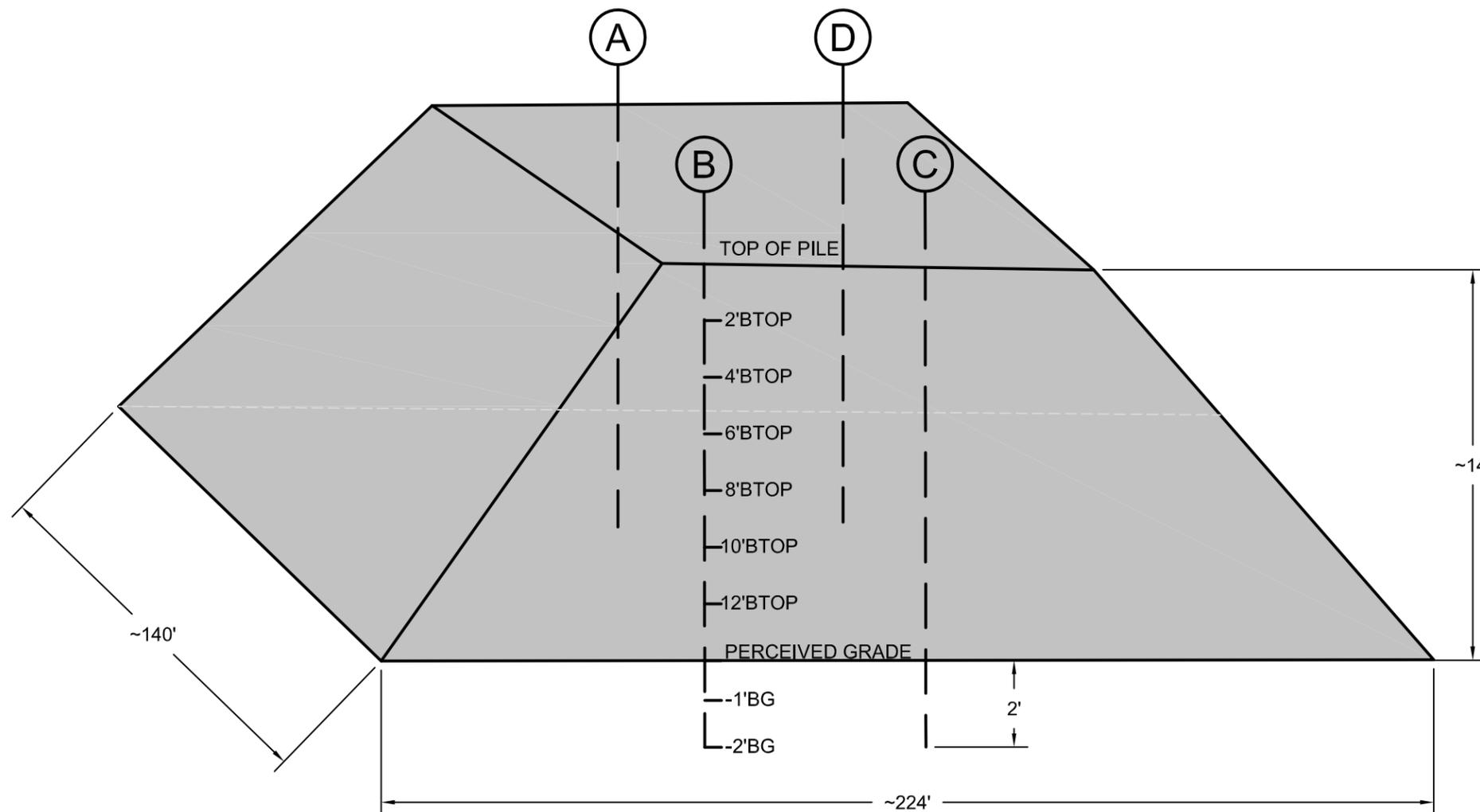


Sample Location	Total PCBs (ppm)
SP2-01	9.072
SP2-02	0.110
SP2-03	0.0802
SP2-04	0.271
SP2-05	9.926
SP2-06	7.273
SP2-07	14.405
SP2-08	25.673
SP2-09	0.119
SP2-10	0.0462

PREVIOUS SAMPLE LOCATIONS & RESULTS



SITE LOCATION



SAMPLING INTERVALS PER SOIL BORING

- SP2-X1.....2' BELOW TOP OF PILE
- SP2-X2.....4' BELOW TOP OF PILE
- SP2-X3.....6' BELOW TOP OF PILE
- SP2-X4.....8' BELOW TOP OF PILE
- SP2-X5.....10' BELOW TOP OF PILE
- SP2-X6.....12' BELOW TOP OF PILE
- SP2-X7.....AT PERCEIVED GRADE
- SPS-X8.....AT 1' BELOW GRADE
- SP2-X9.....AT 2' BELOW GRADE

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

Lot 2 - Existing Soil Pile

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

FIGURE

1