



November 1, 2023

To: Benjamin McPherson (NYSDEC), Angela Martin (NYSDEC)

From: John Black, P.E (Inventum)

CC: Jon Williams (3821 River Road, Inc.); John Yensan (OSC); Al Trpevski (OSC); Robert Knorr (The Knorr Group); Todd Waldrop and James Edwards (Inventum)

RE: Interim Site Management Work Plan
3821 River Road, Inc.
Brownfield Cleanup Program Site No. C915003
3821 River Road
Town of Tonawanda, New York

Inventum Engineering, P.C. (Inventum), on behalf of 3821 River Road, Inc. (3821), is submitting this Interim Site Management Work Plan (Site Management Plan) to the New York State Department of Environmental Conservation (NYSDEC) for the 3821 River Road, Inc. Brownfield Cleanup Program (BCP) Site (#C915003, 3821 BCP Site) located at 3821 River Road, Town of Tonawanda, New York (Figure 1).

Purpose

The property management and ownership at 3821 River Road (Figure 1) transitioned from Rouse Breihan, Inc. (Rouse Breihan), to 3821 in 2022. For purposes of this and future work plans, the buildings have been assigned numbers (Figure 3) and significant features of the 3821 BCP Site have been grouped into three Areas of Investigation consisting of AOI-1 – West, AOI-2 – Center Plant Area, and AOI-3 – East as shown on Figure 3. Also shown on Figure 3, is a site wide grid overlay across the site with vertical numbers and horizontal letters to easily reference an area of the site.

The Interim Site Management Work Plan addresses the following:

- General Site Management;
- Security;
- Site Controls;
- Identification, Collection and Disposal of containers containing hazardous, liquid and aerosol materials;
- Housekeeping/General Site Cleanup/Removal of Recyclable Materials; and
- Controlling Invasive Materials.

Surface water management, tank residuals, and management of liquids accumulating in containment areas will be addressed under separate work plans.

The stockpiles and piles of materials around the 3821 BCP Site (Figure 4) will be characterized under this work plan or the Remedial Investigation Work Plan (Figure 5, Inventum, August 17, 2023) but

management of those materials will be addressed under a subsequent Interim Remedial Measures (IRM) Work Plan.

An Asbestos Containing Materials (ACM) survey has been conducted to define the presence, extent and condition of ACM that requires abatement or that could restrict access for inspections, maintenance or investigation on the 3821 BCP Site.

General Site Management

The site requires overall general management to ensure conditions do not continue to deteriorate. 3821 has implemented a number of general site management activities that will continue under this work plan.

Scope of Work

The general site management activities associated with impacted or potentially impacted areas of the site include:

- Management of onsite activities;
- Weekly and monthly reporting;
- Waste management and tracking;
- Excavations and material management;
- Maintaining document repositories; and
- Coordination with the Town of Tonawanda for waste and water management.

Security

Security has been provided for the Site since the property was transferred as an extension of the security team which is present at the adjacent 3875 River Road property. To provide coverage, remotely monitored cameras have been mounted at strategic locations across the 3821 BCP Site. 3821 has:

- Provided security onsite 24 hours per day 7 days per week;
- Procured and installed security cameras to remotely monitor critical access points across the 3821 site;
- Changed the locks and secured the office and laboratory building on the 3821 BCP Site; and
- Conducted daily patrols to ensure the perimeter fence (where it exists) is intact.

Scope of Work

Under the security tasks, Riverview has, and will continue to:

- Provide security onsite 24 hours per day 7 days per week;
- Monitor and maintain security cameras to provide the capability to observe the 3821 BCP Site from the guard building at 3875 River Road. The security team has access to call 911 in the event of an unauthorized incursion on the site, fire, or medical emergency;
- Maintain fencing along River Road and the National Grid property line; and
- Conduct daily patrols to ensure the perimeter fence (where it exists) is intact.



Site Controls

The 3821 BCP Site's appearance suggests that the property had been largely uncontrolled for years. Other than the use of the office building, laboratory, and the former Ausmus Garage (Building No. 10) the buildings are not known to have been used after the 1985 sale of the facility from Allied to Rouse Breihan. No documentation can be located to confirm daily inspections, maintenance of electrical equipment, management of plumbing and piping, or maintenance of surfaces across the property.

OSC has a full-time crew of Hazardous Waste Operations and Emergency Response (HAZWOPER) trained staff on the adjacent Riverview Innovation & Technology Campus (RITC) BCP Site at 3875 River Road to respond, if needed, to maintain control of the 3821 BCP Site. Inventum has three full-time technical site management staff at 3875 River Road to provide the necessary resources to address conditions identified by inspections, IRM activities, and to conduct the required sample collection activities.

Scope of Work

Under the site controls tasks, 3821 will:

- Provide access to staff to conduct inspections of critical components of the remaining facilities;
 - Gates and doors to the office and laboratory building;
 - Confirm the fence along the National Grid property boundary;
 - Tanks and secondary containment structures to verify no releases have occurred;
 - Buildings containing drums and containers of liquids to ensure no leakage or releases; and
 - Maintain access during inclement weather.
- Conduct daily inspections of the equipment and facilities on the property;
- Monitor and report any conditions that require action associated with; insulation conditions, liquid levels in containment areas, container inventories;
- Provide access for site maintenance, investigation and IRM activities where obstructed by materials abandoned by former owner;
- Maintain access for liquids management including but not limited to debris and snow removal; and
- Support responses to conditions on the property.

Container Identification, Collection, and Disposal

At the time of the Tonawanda Coke Corporation (TCC) shutdown on the 3875 River Road property in 2018, the office building and laboratories on the 3821 River Road property were occupied by TCC employees supporting the TCC operations. At shutdown the employees vacated the 3821 River Road property as it was, without managing any containers, including laboratory glassware with materials that were being tested. In addition, throughout the 3821 BCP Site there are containers varying in size from a few ounces to 55-gallon drums (both empty and containing residuals). The residuals range from solid reagents to aerosols. Some known flammable materials in the laboratory have been secured by OSC in flammable materials cabinets, but other chemicals are unmarked and only secured by the locked building and the 3821 BCP Site fences. The remaining containers are distributed across the site.



Scope of Work

An inventory of the containers will be conducted across the 3821 BCP Site in all areas free of potential exposure to ACMs. The scope under this task will include:

- Establishing an inventory by building (Figure 2) of containers. Sort by; known/labeled, unknown liquid, unknown solid, unknown aerosol, and empty;
- Engaging an expert in laboratory chemicals (the former TCC laboratory manager works for Alpha and is available as a consultant) to catalog the laboratory chemicals and segregate them by compatibility in the laboratory, small glass containers will not be moved to the container management area until they can be properly packaged for disposal;
- Establish a container management area in Building 12B (North Garage – West);
- Establish a drum (containers greater than 5 gallons) management area in Building 5 or 12B;
- Relocate and sort by content and compatibility all small (less than 5 gallon) containers to the container management area (Building 12B);
- Relocate and sort by content and compatibility all drums (greater than 5 gallon) containers to the drum management area (Building 5 or 12B);
- Scrap or dispose all empty containers;
- Combine like materials to reduce the number of containers;
- Recycle all liquids that can be returned to the manufacturer or recycled as used petroleum;
- Prepare and lab pack all small containers for disposal;
- Prepare waste profile forms for all materials to be disposed; and
- Properly transport and dispose of all containers of waste.

Housekeeping/Surface Debris Cleanup/Removal of Recyclable Materials

The care and housekeeping after Allied sold the property at 3821 River Road to Roush Breihan appears to have been limited. Immediately before the sale, Roush Breihan salvaged metals and other materials and equipment they considered valuable and left a number of areas of the site in disarray. As a result of the lack of care, and apparently greatly exacerbated by the recovery efforts, the site has equipment, debris and rubble scattered throughout. This material presents safety and access issues over the majority of the center plant area (Figure 3) of the 3821 BCP Site.

Scope of Work

The materials will be organized, and some materials will be removed under this Work Plan to facilitate access for the Remedial Investigation. Any materials that are consolidated or stockpiled on-site will be identified by signs or labels, as appropriate, to indicate that the material is being actively managed.

- Recyclable and reusable materials:
 - The NYSDEC Project Manager will be notified no less than 5 days prior to any offsite shipment of any class of recyclable or reusable materials. These include, but are not limited to:
 - Scrap metal from buildings or equipment;
 - New metal equipment, components and materials to be sold for reuse;
 - Unused plastic materials and ceramic materials; and
 - Unused electrical equipment.



- Materials to be disposed:
 - The NYSDEC Project Manager will be notified no less than 5-days prior to any offsite shipment of any class of materials to be disposed to clear the site for the remedial investigation or other IRM. These include, but are not limited to:
 - Non-durable/non-recyclable equipment or materials;
 - Paper and other non-durable materials that pose a health exposure;
 - Unused plastic, wood, and ceramic materials that are not suitable for reuse or recycling;
 - Tires and wheels and abandoned vehicles; and
 - Electrical equipment that is not suitable for reuse or recycling.
- Materials to be relocated on the 3821 BCP Site:
 - There are piles of materials on the site (Figure 4) that will interfere with the remedial investigation or other IRMs that must be relocated. These materials will be relocated for future management onto areas that are not currently identified for investigation or an IRM:
 - Piles of coke over the former oil water separator location;
 - Piles of coke and breeze in areas to be investigated; and
 - Piles of ceramic process vessel packing obstructing the investigation.

Cutting Invasive Growth

The maintenance of the grounds after TCC operations on the adjacent site appears to have been limited. As a result, there is significant growth of shrubs and undergrowth (primarily phragmites) obstructing access and observation and investigation of areas that potentially contain site related wastes and other materials.

Scope of Work

Significant growth of woody and non-woody species has encroached on and over materials on the site that must be evaluated to determine how to properly manage the entire 3821 BCP Site. Trees and larger shrubs will be left in place, unless directly obstructing access to an area of the site that must be inspected or investigated. Non-woody, brush and smaller shrubs must be mowed to allow proper investigation and management of the onsite materials. Phragmites, grasses and light brush will be cut and allowed to biodegrade in place.

The materials are largely in the areas along the south property boundary, along the River Road earthen berm, and on the east end of the 3821 BCP Site.

Excavations

Site excavation work will be completed in accordance with the Excavation Work Plan (EWP) (Appendix A) and in accordance with the approved 3821 Community Air Monitoring Program (CAMP) included in Appendix B. This EWP section was prepared to provide the framework to manage site excavations such as:

- Utility installations;
- Excavations to locate existing or abandon utilities and below ground pipes for repair, replacement or removal;
- Borings to install utility poles; and



- Foundation preparations.

The EWP does not address the means of implementing the remedial investigations or remedial actions for the site.

Schedule

The proposed activities will be ongoing, but the expected durations are:

- General Site Management – through the Certificate of Completion (CoC);
- Security – through the CoC;
- Site Controls – through the CoC;
- Container Management – 6- to 12-months;
- Housekeeping – through the CoC; and
- Controlling Invasive Materials – through the CoC.

Notifications and Reporting

The NYSDEC will be notified no less than 5-days before the following activities under this Site Management Plan:

1. Subsurface excavations;
2. Shipping a new waste stream offsite for disposal; and
3. Shipping a new type of material offsite for reuse or recycling.

Inventum will submit an e-mail to the NYSDEC prior to shipping any material or equipment offsite for reuse or recycling. The e-mail will include the characterization of the material or equipment, the intended disposal, reuse or recycling process; and the results of testing that was conducted to confirm the material or equipment is suitable for the proposed disposal facility or its intended use. For all materials to be shipped, the proposed location and in the case of disposal, waste profile will be included.



Engineering Certification

I, John P. Black, certify that I am currently a NYS registered professional engineer as defined in 6 NYCRR Part 375 and that this Site Management Interim Remedial Measures Work Plan was prepared in accordance with all applicable statutes and regulators and in substation conformance with the DER Technical Guidance for Site Investigation and Remediation (DER-10).

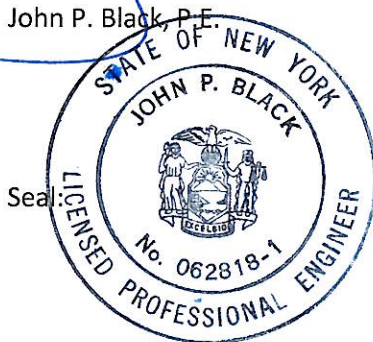
Respectfully Submitted,

Inventum Engineering, P.C.

Date: 11.1.2023

License No: 062818-1

John P. Black, P.E.

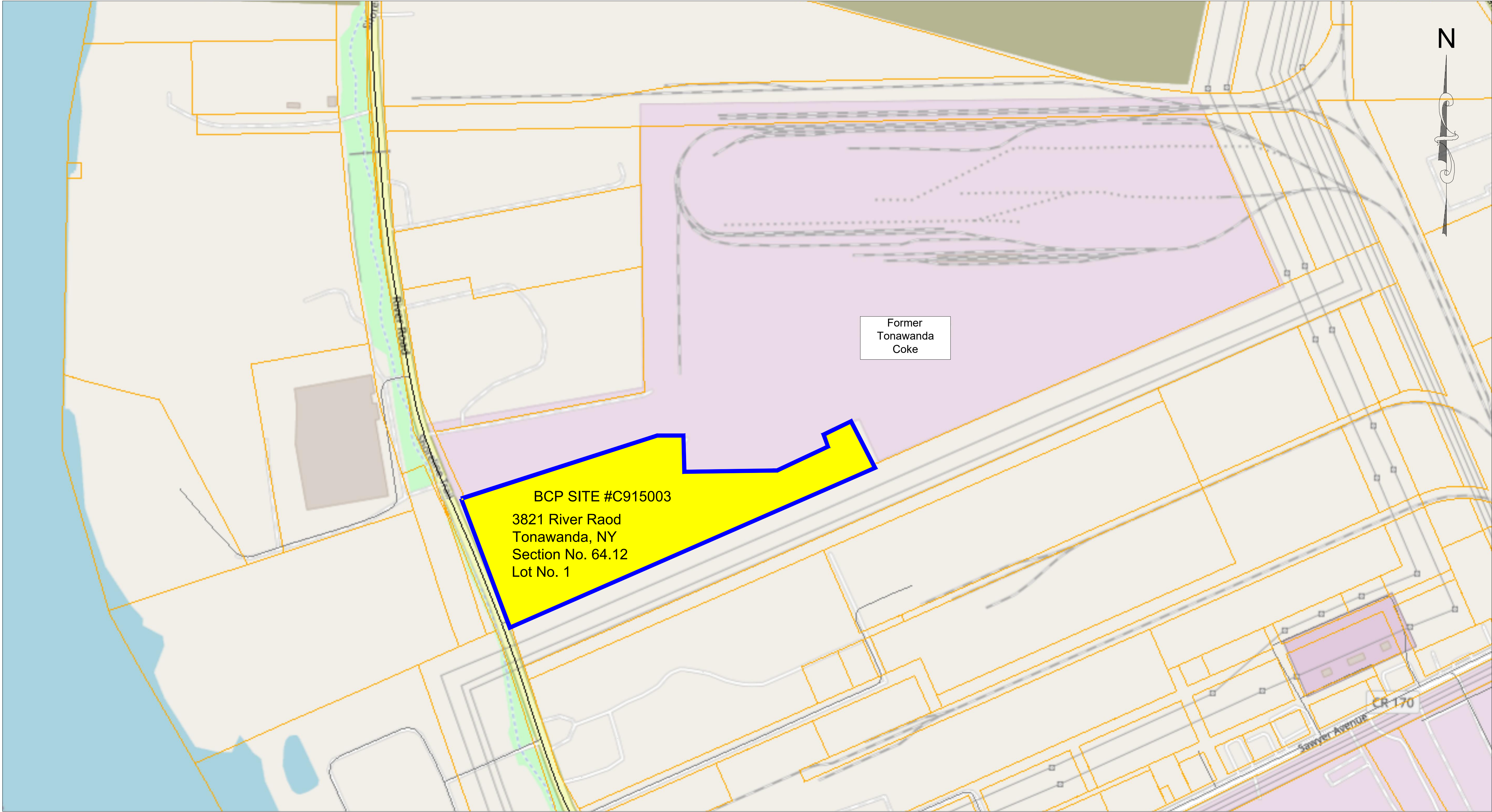


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Figures





Erie County, New York, Interactive Mapping Viewer, www2.erie.gov/gis

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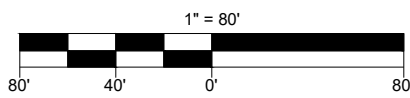
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441 CARLISLE DRIVE
SUITE C
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SITE LOCATION MAP
3821 RIVER ROAD
TONAWANDA NEW YORK, 14150
NYSDEC BCP SITE #C915003

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APPROVED	
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FIGURE 1

DRAWING NUMBER
INTERIM SITE
MANAGEMENT PLAN



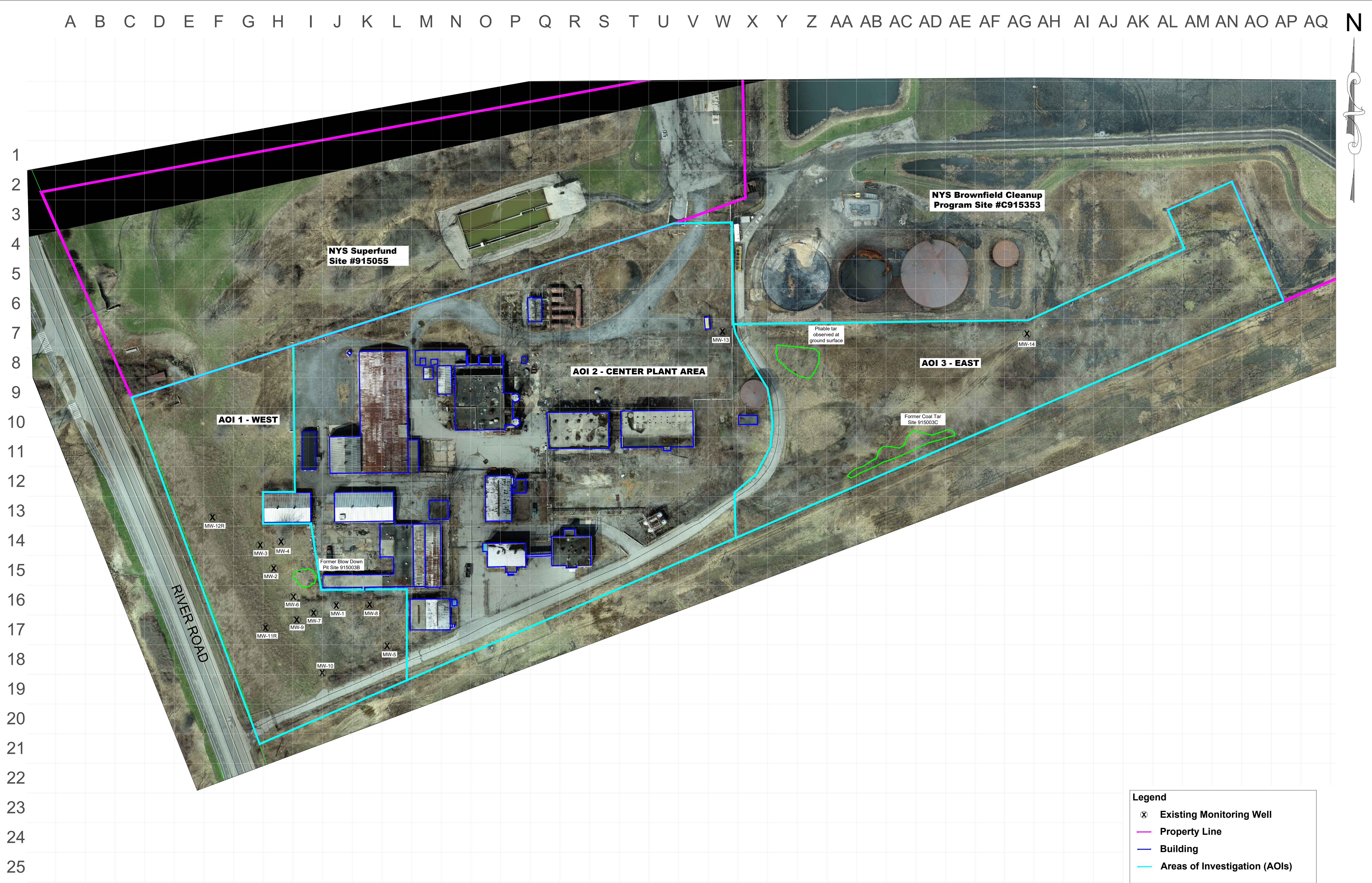
- References:
1. Parsons, 2021, Tonawanda Plastics Site NYSDEC ID 915003 Draft Site Investigation Summary Report
 2. Niagara Boundary and Mapping Services, 2022, Site Aerial of 3821 River Road Tonawanda
 3. Building names provided by previous seller, not documented.



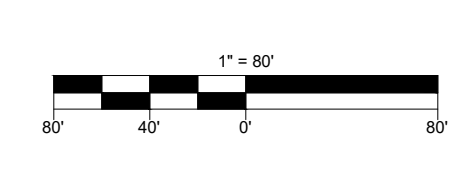
- BUILDING NUMBERS**
1. Admin - Locked
 2. Storage 1
 3. Possible Septic Tank - 3 Openings
 4. Electrical Utility Building
 5. West Warehouse 2
 6. West Warehouse 1
 7. West Storage 3
 8. Debris Piles
 9. Office Trailer
 10. Ausmus Garage
 11. Brick Shop
 12. A - North Garage A (East)
B - North Garage B (West)
 13. A - Open Lean To (Under Larger Lean To C)
B - Open Lean To (Under Larger Lean To C)
C - Larger Lean To
 14. Discharge Meter House with Manhole
 15. Allied Pump House - Product Pumping
 16. Electric Equipment Mobile Building
 17. Lean-To 2
 18. Northwest Storage
 19. Small Pump House
 20. Coke Building & Investigation Derived Waste (IDW) Storage Area
 21. Northeast Storage
 22. Laboratory
 23. Two-story Administration Building
 24. Pump House

- Legend**
- X Existing Monitoring Well
 - Property Line
 - Building

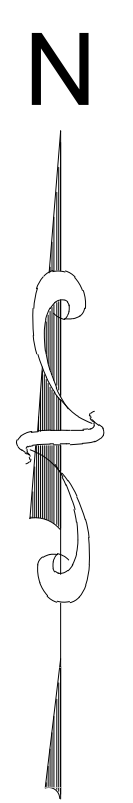




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- References:
1. Parsons, 2021, Tonawanda Plastics Site NYSDEC ID 915003 Draft Site Investigation Summary Report
 2. Parsons, 2017, Tonawanda Plastics Investigation Summary Report
 3. Niagara Boundary and Mapping Services, 2022, Site Aerial of 3821 River Road Tonawanda



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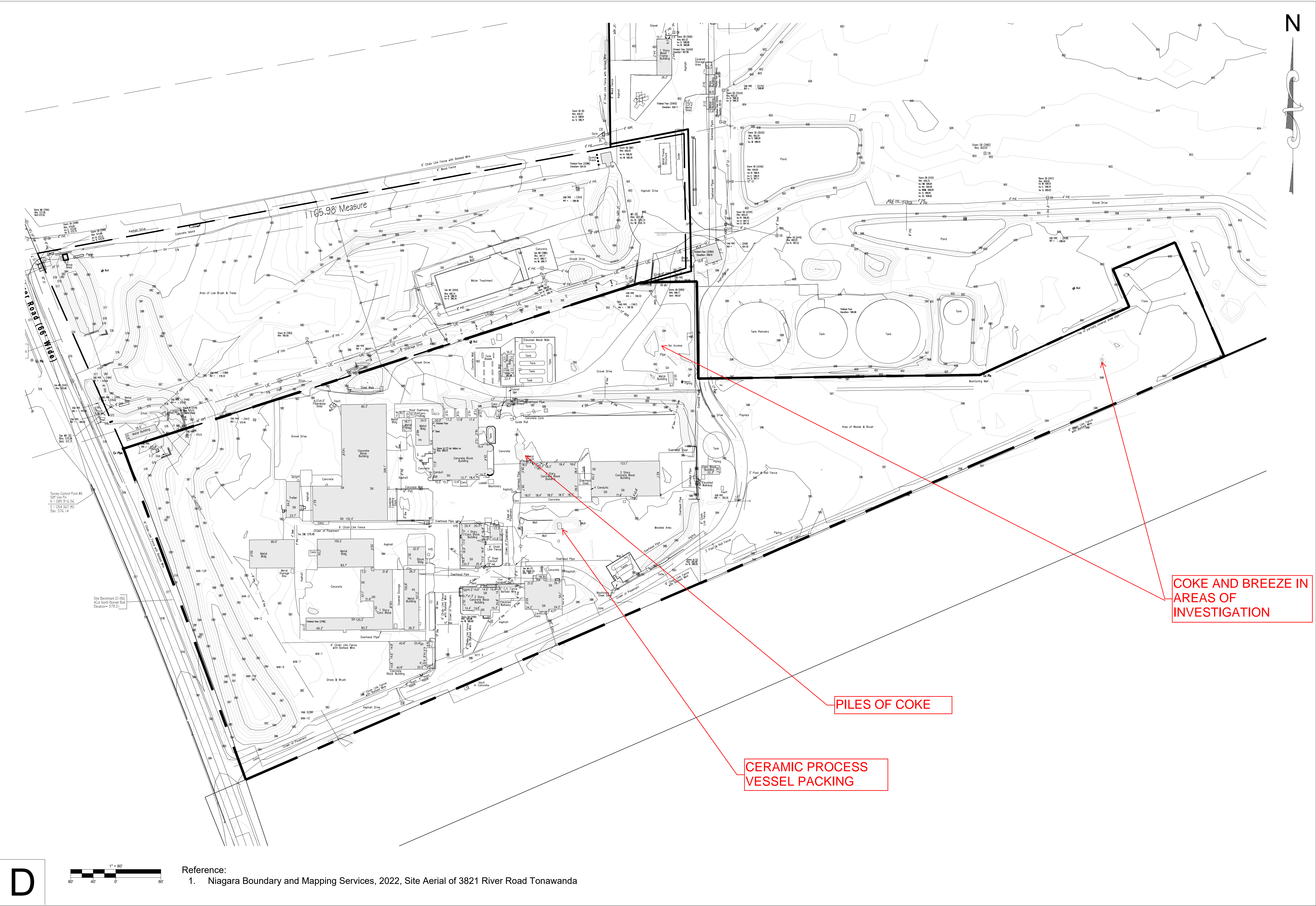
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AREAS OF INVESTIGATION (AOIs) BOUNDARIES
3821 RIVER ROAD
TONAWANDA NEW YORK, 14150
NYSDEC BCP SITE #C915003

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441 CARLISLE DRIVE
SUITE C
HERNDON, VIRGINIA 20170
(703) 722-6049
www.InventumEng.com

FIGURE 3
DRAWING NUMBER
INTERIM SITE
MANAGEMENT PLAN



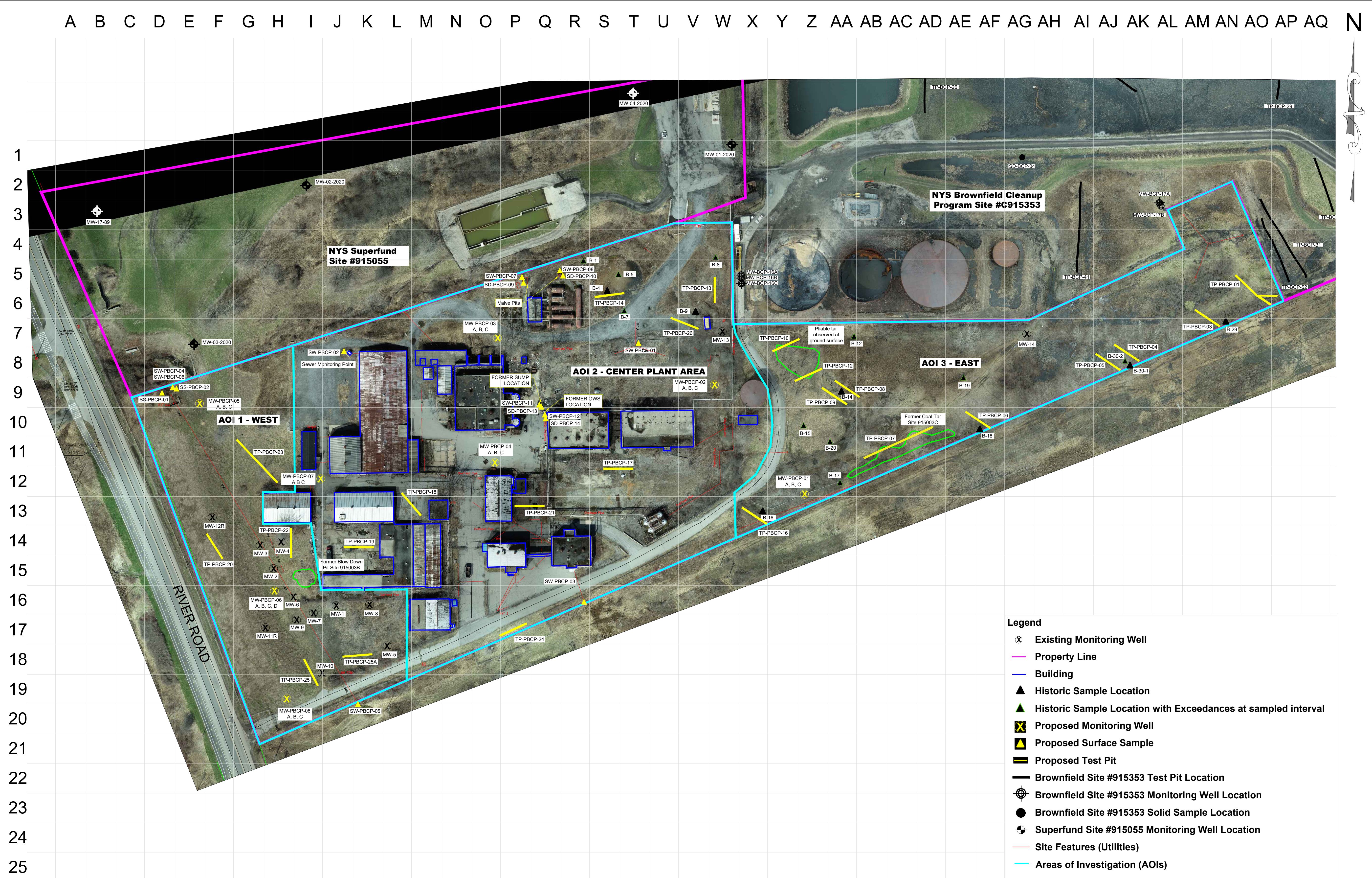
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SITE TOPOGRAPHIC MAP, APRIL 2022
3821 RIVER ROAD
TONAWANDA, NY 14150

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FIGURE 4
DRAWING NUMBER
INTERIM SITE
MANAGEMENT PLAN



- References:
1. Parsons, 2021, Tonawanda Plastics Site NYSDEC ID 915003 Draft Site Investigation Summary Report
 2. Parsons, 2017, Tonawanda Plastics Investigation Summary Report
 3. Niagara Boundary and Mapping Services, 2022, Site Aerial of 3821 River Road Tonawanda
 4. Inventum, 2023, 3821 River Road Remedial Investigation Workplan

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SAMPLE LOCATIONS
3821 RIVER ROAD
TONAWANDA NEW YORK, 14150
NYSDEC BCP SITE #C915003

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FIGURE 5

DRAWING NUMBER
INTERIM SITE
MANAGEMENT PLAN

Appendices



Appendix A – Excavation Work Plan





Excavation Work Plan (EWP)

This EWP was prepared to provide the framework to manage site excavations such as:

- Utility installations;
- Excavation to locate existing or abandon utilities and below ground pipes for repair, replacement or removal;
- Borings to install utility poles; and
- Foundation preparations.

The EWP does not address the means of implementing the remedial investigations or remedial actions for the site such as Test Pits.

1.0 Notifications

The excavation work will be completed by OSC or under direct supervision from OSC and Inventum. 3821 will provide the NYSDEC with notifications, as needed, in accordance with NYSDEC's DER – 10 in accordance with the following actions:

- 5-day advance notice of any proposed ground-intrusive activity pursuant to the Excavation Work Plan.
- 5-day advance notice of any proposed movement of potentially contaminated materials.
- Notice within 48-hours of any damage or defect to the foundation, structures that has the potential to affect the environment, and likewise, any action to be taken to mitigate the damage or defect.
- Verbal notice by noon of the following day of any emergency, such as a fire; flood; or earthquake that has the potential to reduce the effectiveness of surface water controls in place at the site, with written confirmation within 7 days that includes a summary of actions taken, or to be taken, and the potential impact to the environment and the public.

Follow-up status reports on actions taken to respond to any emergency event requiring ongoing responsive action submitted to the NYSDEC within 45 days describing and documenting actions taken.

- Notifications of all spills and releases of petroleum products in accordance with the following:
- All petroleum spills that occur within New York State (NYS) must be reported to the NYS Spill Hotline (1-800-457-7362) within 2 hours of discovery, except spills which meet all of the following criteria:
 - The quantity is known to be less than 5 gallons; and
 - The spill is contained and under the control of the spiller; and
 - The spill has not and will not reach the State's water or any land; and
 - The spill is cleaned up within 2 hours of discovery.

- A spill is considered to have not impacted land if it occurs on a paved surface such as asphalt or concrete. A spill on any soil surfaces or any gravel parking lot is considered to have impacted land and is reportable. Any spills or releases that do not require reporting to the NYS Spill Hotline will be reported, in writing, to the DEC BCP Project Manager within 48-hours of discovery.
- In the event of a potential or actual release from the property beyond Outfall 004 of the adjacent site #915055, the following shall be called in the order given after calling the NYS Spill Hotline (1-800-457-7362):
 - National Response Center - 800.424.8802
 - U.S. Coast Guard - 716.846.4168
 - U.S. EPA - 732.548.8730
 - NYSDEC (Region 9) - 716.851.7220
 - NYSDEC (Albany) - 800.457.7362
- In the event of a spill that generates material from on-Site cleanup efforts (e.g., sorbent material, impacted soil, etc.), the Project Manager will confer with Inventum and the DEC regarding the nature of the waste in order to determine the proper reuse, recycling and/or disposal method.

Table 1 includes contact information for the above notifications. The information on this table will be updated as necessary to provide accurate contact information.

Table 1: Notifications

Name	Contact Information
Ben McPherson, NYSDEC Project Manager	(716) 851-7220 benjamin.mcpherson@dec.ny.gov
Andrea Caprio, NYSDEC Regional Engineer	(716) 851-7220 andrea.caprio@dec.ny.gov
Robert Poczalski, NYSDEC Petroleum and Chemical Bulk Storage	(716) 851-7220 robert.poczalski@dec.ny.gov
Paul Morrow, Pre-treatment Coordinator, Town of Tonawanda *	(716) 693-4900 ext. 4550 pmorrow@tonawanda.ny.us

Notes: Notifications are subject to change and will be updated, as necessary.

***Paul Morrow to be notified of any release with the potential to reach a Town of Tonawanda sanitary or storm sewer.**

Each notification of a variation will include:

- A detailed description of the work to be performed, including the location and areal extent of excavation, plans/drawings for site re-grading, intrusive elements or utilities to be installed below ground surface, estimated volumes of potentially contaminated materials to be excavated, and any work that may impact an engineering control;
- A summary of environmental conditions anticipated to be encountered in the work areas, including the nature and concentration levels of contaminants of concern, potential presence of grossly contaminated media (defined in the Soil Screening Methods Section of this Site Management Plan) and plans for any pre-construction sampling.



- A schedule for the work, detailing the start and completion of all intrusive work.
- A summary of the applicable components of this Site Management Plan, Section Excavation.
- A statement that the work will be performed in compliance with this Site Management Plan, Section Excavation and 29 CFR 1910.120 (if applicable).
- A copy of the contractor's health and safety plan (HASP), in electronic format.
- Identification of disposal facilities for potential waste streams (if applicable); and
- Identification of sources of any anticipated backfill, along with all required chemical testing results.

2.0 Soil Screening Methods

Visual, olfactory and instrument-based (e.g. photoionization detector) soil screening will be performed during all excavations into known or potentially contaminated material and during invasive work performed during development. The field screening of the materials being excavated and managed will be performed by Inventum.

Any material producing a noticeable discolored liquid or an odor detectable more than 4 feet away shall be reported to the onsite 3821 Staff:

- | | | |
|------------------|---|---|
| a. Matt Reardon | - | 716.570.0717 |
| b. Peter Zaffram | - | 716.335.2045 |
| c. John Black | - | 571.217.6761 (If Matt or Peter are not available) |

Soils will be segregated based on previous environmental data and screening results into material that requires off-site disposal and material that requires testing to determine if the material can be reused on-site as soil for fill. Soils will be placed back to the source of excavation if no visual or olfactory evidence of contamination is observed.

For purposes of this EWP potential gross contamination shall mean:

"Grossly contaminated media means soil, sediment, surface water or groundwater which contains sources or substantial quantities of mobile contamination in the form of NAPL, as defined in subdivision (ac) of this section, that is identifiable either visually, through strong odor, by elevated contaminant vapor levels or is otherwise readily detectable without laboratory analysis" (6 NYCRR Part 375-1.2(u)).

Potentially grossly contaminated materials have been identified previously in the area west of building 16, and in the heavy vegetated western portion of the site, northeast of building 24.

Trash and potential spill cleanup materials will be disposed offsite in accordance with all applicable requirements in facilities permitted for those materials.

3.0 Soil Staging Methods

Excavated soils generated from excavations that exhibit gross contamination will be stockpiled in the designated IDW Storage Area (Building 20). Grossly contaminated soils will be stockpiled and staged on plastic sheeting (10 mil min) and covered with 6 mil minimum plastic sheeting, or alternatively, containerized in a double lined (10 mil min.) roll-off container. Stockpile volumes on plastic sheeting shall not exceed 100-cubic yards. Additional waste characterization samples may be collected as necessary and separate stockpiles may be used to segregate clearly grossly contaminated material of different characteristics. One (1) waste characterization sample will be collected for every 100-cubic yards of



stockpiled material. Waste characterization sample analysis shall include the full suite of toxicity characteristics:

- Toxicity Characteristic Leaching Procedure (TCLP) VOCs, SVOCs, pesticides, and metals
- PCBs
- Flash Point and Paint Filter Test
- pH
- Reactivity, Cyanide
- Reactivity, Sulfide

A record of which soil is in each stockpile, where they are stockpiled, and which waste characterization results represent that material will be kept in the field notebook.

Stockpiles will be inspected at a minimum once each week . Results of inspections will be recorded in a logbook and maintained at the site and be available for inspection by the NYSDEC.

4.0 Materials Excavation and Load-out

A qualified environmental professional as defined in 6 NYCRR Part 375, a PE who is licensed and registered in New York State, or a qualified person who directly reports to a PE who is licensed and registered in New York State will oversee all invasive work and the excavation and load-out of all excavated material that exhibits signs of contamination.

3821 is responsible for safe execution of all invasive and other work performed under this Plan.

The presence of utilities and easements on the site will be investigated by the qualified environmental professional. It will be determined whether a risk or impediment to the planned work under the ISMP is posed by utilities or easements on the site. A site utility stakeout was completed for all known utilities prior to any ground intrusive activities at the site.

Loaded vehicles leaving the site will be appropriately lined, tarped, securely covered, manifested, and placarded in accordance with appropriate Federal, State, local, and NYSDOT requirements (and all other applicable transportation requirements). Trucks transporting contaminated soil must have either tight-fitting opaque covers that are secured on the sides and/or back, or opaque covers that are locked on all sides.

A truck wash will be operated on-site, as needed. The qualified environmental professional will be responsible for ensuring that all outbound trucks will be washed at the truck wash before leaving the site until the activities performed under this section are complete. Truck wash waters will be collected and treated in an appropriate manner.

Locations where vehicles enter or exit the site shall be inspected daily for evidence of off-site soil tracking.

The qualified environmental professional will be responsible for ensuring that all egress points for truck and equipment transport from the site are clean of dirt and other materials derived from the site during intrusive excavation activities. Cleaning of the adjacent streets will be performed as needed to maintain a clean condition with respect to site-derived materials. Material accumulated from the street cleaning and egress cleaning activities will be disposed off-site at a permitted landfill facility in accordance with all applicable local, State, and Federal regulations.



5.0 Materials Transport Off-Site

All transport of materials will be performed by licensed haulers in accordance with appropriate local, State, and Federal regulations, including 6 NYCRR Part 364. Haulers will be appropriately licensed and trucks properly placarded.

Material transported by trucks exiting the site will be secured with either tightfitting opaque covers that are secured on the sides and/or back, or opaque covers that are locked on all sides. Loose-fitting canvas-type truck covers will be prohibited. If loads contain wet material capable of producing free liquid, truck liners will be used.

Truck transport routes consist of trucks exiting the site from the south entrance at River Road and trucks would either travel north or south on River Road to the New York State Thruway and the designated disposal facility. All trucks loaded with site materials will exit the vicinity of the site using only approved truck routes. The most appropriate route shall take into account: (a) limiting transport through residential areas and past sensitive sites; (b) use of city mapped truck routes; (c) prohibiting off-site queuing of trucks entering the facility; (d) limiting total distance to major highways; (e) promoting safety in access to highways; and (f) overall safety in transport. There is only one small residential area south of the site before reaching the Thruway, no residential areas lie between the site and the Thruway entrance to the north.

Trucks will be prohibited from stopping and idling in the neighborhood outside the project site. Egress points for truck and equipment transport from the site will be kept clean of dirt and other materials during site remediation and development.

6.0 Materials Disposal Off-Site

All material excavated will remain onsite unless determined to be a hazardous waste or grossly contaminated. Hazardous waste and grossly contaminated material will be transported and disposed off-site in a permitted facility in accordance with all local, State and Federal regulations. If disposal of material from this site is proposed for unregulated off-site disposal (i.e. clean soil removed for development purposes), a formal request with an associated plan will be made to the NYSDEC project manager. Unregulated off-site management of materials from this site will not occur without formal NYSDEC project manager approval.

Off-site disposal locations for excavated soils will be identified in the pre-excavation notification. This will include estimated quantities and a breakdown by class of disposal facility if appropriate, (e.g. hazardous waste disposal facility, solid waste landfill, petroleum treatment facility, C&D debris recovery facility). Actual disposal quantities and associated documentation will be reported to the NYSDEC in the associated documentation. This documentation will include, but will not be limited to: waste profiles, test results, facility acceptance letters, manifests, bills of lading and facility receipts.

Non-hazardous, historic fill and contaminated soils taken off-site will be handled consistent with 6 NYCRR Parts 360, 361, 362, 363, 364 and 365. Material that does not meet Unrestricted SCOs is prohibited from being taken to a New York State C&D debris recovery facility (6 NYCRR Subpart 360-15 registered or permitted facility).



7.0 Materials Reuse On-Site

The qualified environmental professional, as defined in 6 NYCRR Part 375, will ensure that procedures defined for materials reuse in this EWP are followed and that unacceptable material (i.e. contaminated) does not remain on-site unless approved by the NYSDEC or in accordance with an IRM or Remedial Action Work Plan. Contaminated on-site material, including historic fill and contaminated soil, that is acceptable for reuse on-site will be placed below the demarcation layer or impervious surface, and will not be reused within the cover system or within landscaping berms. Contaminated on-site material may only be used beneath the site cover as backfill for subsurface utility lines with prior approval from the NYSDEC project manager.

Proposed materials for reuse on-site must be sampled for full suite analytical parameters including per- and polyfluoroalkyl substances (PFAS) and 1,4-dioxane. The sampling frequency will be in accordance with DER-10 Table 5.4(e)10 unless prior approval is obtained from the NYSDEC project manager for modification of the sampling frequency. The analytical results of soil/fill material testing must meet the site use criteria presented in NYSDEC DER-10 Appendix 5 – Allowable Constituent Levels for Imported Fill or Soil for all constituents listed, and the NYSDEC Sampling, Analysis, and Assessment of Per- and Polyfluoroalkyl Substances [November 2022 or date of current version, whichever is later] guidance values. Approvals for modifications to the analytical parameters must be obtained from the NYSDEC project manager prior to the sampling event.

Soil/fill material for reuse on-site will be segregated and staged as described in Sections 2.0 and 3.0 of this EWP. The anticipated size and location of stockpiles will be provided in the 15-day notification to the NYSDEC project manager. Stockpile locations will be based on the location of site excavation activities and proximity to nearby site features. Material reuse on-site will comply with requirements of NYSDEC DER-10 Section 5.4(e)4. Any modifications to the requirements of DER-10 Section 5.4(e)4 must be approved by the NYSDEC project manager.

Any demolition material proposed for reuse on-site will be sampled for asbestos and the results will be reported to the NYSDEC for acceptance. Concrete crushing or processing on-site will not be performed without prior NYSDEC approval. Organic matter (wood, roots, stumps, etc.) or other solid waste derived from clearing and grubbing of the site will not be reused on-site.

8.0 Fluids Management

All liquids to be removed from the site, including but not limited to, excavation dewatering, decontamination waters and groundwater monitoring well purge and development waters, will be handled, transported and disposed off-site at a permitted facility in accordance with applicable local, State, and Federal regulations or treated and discharge to the publicly owned treatment works (POTW). Dewatering, purge and development fluids will not be recharged back to the land surface or subsurface of the site, and will be managed off-site, unless prior approval is obtained from NYSDEC.

Discharge of water generated during large-scale construction activities to surface waters (i.e. a local pond, stream or river) will be performed under a SWPPP or SPDES permit



9.0 Backfill From Off-site Sources

All materials proposed for import onto the site will be approved by the qualified environmental professional, as defined in 6 NYCRR Part 375, and will be in compliance with provisions in this EWP prior to receipt at the site. A Request to Import/Reuse Fill or Soil form, which can be found at <http://www.dec.ny.gov/regulations/67386.html>, will be prepared and submitted to the NYSDEC project manager allowing a minimum of 5 business days for review.

Material from industrial sites, spill sites, or other environmental remediation sites or potentially contaminated sites will not be imported to the site.

All imported soils will meet the backfill and cover soil quality standards established in 6NYCRR 375-6.7(d) and DER-10 Appendix 5 for commercial site use.

Soils that meet 'general' fill requirements under 6 NYCRR Part 360.13, but do not meet backfill or cover soil objectives for this site, will not be imported onto the site without prior approval by NYSDEC project manager. Soil material will be sampled for the full suite of analytical parameters, including PFAS and 1,4-dioxane. Solid waste will not be imported onto the site.

Trucks entering the site with imported soils will be securely covered with tight fitting covers. Imported soils will be stockpiled separately from excavated materials and covered to prevent dust releases.

10.0 Stormwater Pollution Prevention

Barriers, silt socks, and hay bale checks will be installed and inspected once a week and after every storm event. Results of inspections will be recorded in a logbook and maintained at the site and available for inspection by the NYSDEC. All necessary repairs shall be made immediately. Accumulated sediments will be removed as required to keep the barrier and hay bale check functional.

All undercutting or erosion of the silt fence toe anchor shall be repaired immediately with appropriate backfill materials. Manufacturer's recommendations will be followed for replacing silt fencing damaged due to weathering. Erosion and sediment control measures identified in the Site Management Plan shall be observed to ensure that they are operating correctly. Where discharge locations or points are accessible, they shall be inspected to ascertain whether erosion control measures are effective in preventing significant impacts to receiving waters.

Silt fencing or hay bales will be installed around the entire perimeter of the construction or limited to excavation work area perimeter with appropriate construction entrances installed.

11.0 Excavation Contingency Plan

If underground tanks or other previously unidentified contaminant sources are found excavation activities will be suspended until sufficient equipment is mobilized to address the condition. The NYSDEC project manager will be promptly notified of the discovery. Sampling will be performed on product, sediment and surrounding soils, etc. as necessary to determine the nature of the material and proper disposal method. Chemical analysis will be performed for a full list of analytes [TAL metals, TCL volatiles and semi-volatile organic compounds (including 1,4-dioxane), TCL pesticides and PCBs, and PFAS], unless the site history and previous sampling results provide sufficient justification to limit the list of analytes. In this case, a reduced list of analytes will be proposed to the NYSDEC project manager for approval prior to sampling.



Any tanks will be closed as per NYSDEC regulations and guidance.

Identification of unknown or unexpected contaminated media identified by screening during invasive site work will be promptly communicated by phone within two hours to NYSDEC's Project Manager. Reportable quantities of petroleum product will also be reported to the NYSDEC spills hotline. These findings will be also included in the excavation documentation.

12.0 Community Air Monitoring Plan (CAMP)

Site excavation work will be completed in accordance with approved CAMP which is included as Appendix B to the ISMP.

13.0 Odor Control Plan

This odor control plan is capable of controlling emissions of nuisance odors off-site. Specific odor control methods to be used on a routine basis is not anticipated to be necessary due to lack of petroleum or chemical impacts. If nuisance odors are identified at the site boundary, or if odor complaints are received, work will be halted, and the source of odors will be identified and corrected. Work will not resume until all nuisance odors have been abated. NYSDEC and NYSDOH will be notified of all odor events and of any other complaints about the project. Implementation of all odor controls, including the halt of work, is the responsibility of the remedial party's Remediation Engineer, and if necessary, shall be implemented until the odor is no longer detectable within 50 feet of the excavation, Or the 3821 BCP Site boundary, whichever is less.

All necessary means will be employed to prevent on- and off-site nuisances. At a minimum, these measures will include:

- a) Limiting the area of open excavations and size of soil stockpiles;
- b) Shrouding open excavations with tarps and other covers; and
- c) Using foams to cover exposed odorous soils. If odors develop and cannot be otherwise controlled, additional means to eliminate odor nuisances will include:
 - 1) Direct load-out of soils to trucks for off-site disposal; e) Use of chemical odorants in spray or misting systems; and,
 - 2) Use of staff to monitor odors in surrounding neighborhoods.

If nuisance odors develop during intrusive work that cannot be corrected, or where the control of nuisance odors cannot otherwise be achieved due to on-site conditions or close proximity to sensitive receptors, odor control will be achieved by sheltering the excavation and handling areas in a temporary containment structure equipped with appropriate air venting / filtering systems.

14.0 Dust Control Plan

Particulate monitoring must be conducted according to the CAMP provided in Appendix B. If particulate levels at the site exceed the thresholds listed in the CAMP or if airborne dust is observed on the site or leaving the site, the dust suppression techniques listed below will be employed. The remedial party will also take measures listed below to prevent dust production on the site.

A dust suppression plan that addresses dust management during invasive on-site work will include, at a



minimum, the items listed below:

- Dust suppression will be achieved using a dedicated on-site water truck for road wetting. The truck will be equipped with a water cannon capable of spraying water directly onto off-road areas including excavations and stockpiles.
- Clearing and grubbing of larger sites will be done in stages to limit the area of exposed, unvegetated soils vulnerable to dust production.
- Gravel will be used on roadways to provide a clean and dust-free road surface.
- On-site roads will be limited in total area to minimize the area required for water truck sprinkling.



Appendix B – Community Air Monitoring Plan





INVENTUM ENGINEERING, P.C.

Community Air Monitoring Plan

3821 River Road, Inc.

Brownfield Cleanup Program (BCP) Site

NYSDEC Site #C915003

3821 River Road

Tonawanda, NY 14150

July 14, 2023



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1 Overview

A Community Air Monitoring Plan (CAMP) requires real-time monitoring for volatile organic compounds (VOCs) and particulates (i.e., dust) at the downwind perimeter of each designated work area when certain activities are in progress at contaminated sites. 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 investigative and remedial work 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.

The generic CAMP presented below will be sufficient to cover many, if not most, sites. Specific requirements should be reviewed for each situation in consultation with NYSDOH to ensure proper applicability. In some cases, a separate site-specific CAMP or supplement may be required. Depending upon the nature of contamination, chemical- specific monitoring with appropriately-sensitive methods may be required.

- *The 3821 River Road, Inc. (3821 River Road) Site will have a perimeter air monitoring program before and during the Remedial Investigation (RI). If there are detections at the property line, additional monitoring requirements will be considered¹.*
- *Three (3) perimeter air monitoring station units (1 Upwind and 2 Downwind) will be mobile and moved as the work area(s) change at the 3821 River Road BCP Site. Example monitoring locations are shown on Figure 10 provided in Appendix A-2.*

Depending upon the proximity of potentially exposed individuals, more stringent monitoring or response levels than those presented below may be required. Special requirements will be necessary for work within 20 feet of potentially exposed individuals or structures and for indoor work with co-located residences or facilities. These requirements should be determined in consultation with NYSDOH.

- *There are no sensitive receptors on the property. The closest residence is more than 0.25 miles away from the property boundary.*

Reliance on the CAMP should not preclude simple, common-sense measures to keep VOCs, dust, and odors at a minimum around the work areas.

2 Community Air Monitoring Plan

Depending upon the nature of known or potential contaminants at each site, real-time air monitoring for VOCs and/or particulate levels at the perimeter of the exclusion zone or work area will be necessary. Most sites will involve VOC and particulate monitoring; sites known to be contaminated with heavy metals alone may only require particulate monitoring. If radiological contamination is a concern, additional monitoring requirements may be necessary per consultation with appropriate DEC/NYSDOH staff.

¹ The text in *italic font* are comments inserted by 3821 River Road, Inc. in addition to the standard CAMP Template.



- *VOC and particulate monitoring will be incorporated into the RI and Interim Remedial Measure (IRM) activities.*

Continuous monitoring will be required for all ground intrusive activities during the demolition of contaminated or potentially contaminated structures, installing groundwater conveyance trenches, operation of a groundwater treatment system when housed indoors, and during the decontamination and deconstruction of Above Ground Storage Tanks (ASTs). Ground intrusive activities include, but are not limited to, soil/waste excavation and handling, test pitting or trenching, and the installation of soil borings or monitoring wells. Decontamination and deconstruction of ASTs include, but are not limited to, removal of residual products, decontamination of ASTs and ancillary piping and equipment, and emptying and decontamination of secondary containment structures.

Periodic monitoring for VOCs will be required during non-intrusive activities such as the collection of soil and sediment samples or the collection of groundwater samples from existing monitoring wells. “Periodic” monitoring during sample collection might reasonably consist of taking a reading upon arrival at a sample location, monitoring while opening a well cap or overturning soil, monitoring during well baling/purging, and taking a reading prior to leaving a sample location. In some instances, depending upon the proximity of potentially exposed individuals, continuous monitoring may be required during sampling activities. Examples of such situations include groundwater sampling at wells on the curb of a busy urban street, in the midst of a public park, or adjacent to a school or residence.

- *During sampling periodic monitoring will be implemented with hand-held instruments.*

3 VOC Monitoring, Response Levels, and Actions

Volatile organic compounds (VOCs) must be monitored at the downwind perimeter of the immediate work area (i.e., the exclusion zone) on a continuous basis or as otherwise specified. Upwind concentrations should be measured at the start of each workday and periodically thereafter to establish background conditions, particularly if wind direction changes. The monitoring work should be performed using equipment appropriate to measure the types of contaminants known or suspected to be present. The equipment should be calibrated at least daily for the contaminant(s) of concern or for an appropriate surrogate. The equipment should 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 must 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 must be shutdown.

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

5. The NYSDEC and NYSDOH project managers for the Site will be notified within 24-hours by phone or email if there is an exceedance of the VOC action level of 25 ppm at the perimeter of the work area as described within Section 3. The notification shall include a description of the control measures implemented to prevent further exceedances.

4 Particulate Monitoring, Response Levels, and Actions

Particulate concentrations should be monitored continuously at the upwind and downwind perimeters of the exclusion zone at temporary particulate monitoring stations. The particulate monitoring should 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 must be equipped with an audible alarm to indicate exceedance of the action level. In addition, fugitive dust migration should be visually assessed during all work activities.

1. If the downwind PM-10 particulate level is 100 micrograms per cubic meter (mcg/m^3) greater than background (upwind perimeter) for the 15-minute period or if airborne dust is observed leaving the work area, then dust suppression techniques must be employed. Work may continue with dust suppression techniques provided that downwind PM-10 particulate levels do not exceed 150 mcg/m^3 above the upwind level and provided that no visible dust is migrating from the work area.

2. If, after implementation of dust suppression techniques, downwind PM-10 particulate levels are greater than 150 mcg/m^3 above the upwind level, work must be stopped and a re-evaluation of activities initiated. Work can resume provided that dust suppression measures and other controls are successful in reducing the downwind PM-10 particulate concentration to within 150 mcg/m^3 of the upwind level and in preventing visible dust migration.

3. All readings must be recorded and be available for New York State (DEC and NYSDOH) and County Health personnel to review.

4. Should the action level of 150 mcg/m^3 above the upwind monitoring concentration be exceeded after corrective actions are taken, work must stop and NYDEC and NYSDOH project managers for the Site must be notified within 24-hours by phone or email. The notification shall include a description of the control measures implemented to prevent further exceedances.



Appendix A-1

Fugitive Dust and Particulate Monitoring

A program for suppressing fugitive dust and particulate matter monitoring at hazardous waste sites is a responsibility on the remedial party performing the work. These procedures must be incorporated into appropriate intrusive work plans. The following fugitive dust suppression and particulate monitoring program should be employed at sites during construction and other intrusive activities which warrant its use:

1. Reasonable fugitive dust suppression techniques must be employed during all site activities which may generate fugitive dust.

2. Particulate monitoring must be employed during the handling of waste or 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. These control measures should not be considered necessary for these activities.

3. Particulate monitoring must be performed using real-time particulate monitors and shall 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/m^3 (1 to $400,000 \text{ :ug/m}^3$);
- (c) Precision (2-sigma) at constant temperature: $\pm 10 \text{ :g/m}^3$ for one second averaging; and $\pm 1.5 \text{ g/m}^3$ for sixty second averaging;
- (d) Accuracy: $\pm 5\%$ of reading \pm precision (Referred to gravimetric calibration with SAE fine test dust (mmd= 2 to 3 :m , $g = 2.5$, as aerosolized);
- (e) Resolution: 0.1% of reading or 1 g/m^3 , whichever is larger;
- (f) Particle Size Range of Maximum Response: 0.1 - 10 ;
- (g) Total Number of Data Points in Memory: $10,000$;
- (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 STEL (15 minutes), alarms required;
- (k) Operating Time: 48 hours (fully charged NiCd battery); continuously with charger;
- (l) Operating Temperature: -10 to 50° C (14 to 122° F);
- (m) Particulate levels will be monitored upwind and immediately downwind at the working site and integrated over a period not to exceed 15 minutes.



4. In order to ensure the validity of the fugitive dust measurements performed, there must be appropriate Quality Assurance/Quality Control (QA/QC). It is the responsibility of the remedial party to adequately supplement QA/QC Plans to include the following critical features: periodic instrument calibration, operator training, daily instrument performance (span) checks, and a record keeping plan.

5. The action level will be established at 150 ug/m^3 (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 ug/m^3 , the upwind background level must be confirmed immediately. If the working site particulate measurement is greater than 100 ug/m^3 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 (see paragraph 7). Should the action level of 150 ug/m^3 above the upwind monitoring concentration be exceeded after corrective actions are taken, work must stop and DER and DOH must be notified within one hour. 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 waste or 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. Activities that have a high dusting potential-- such as solidification and treatment involving materials like kiln dust and lime--will require the need for special measures to be considered.

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

- (a) Applying water on haul roads and demolitions;
- (b) Wetting equipment and excavation faces;
- (c) Spraying water on buckets during excavation and dumping;
- (d) Hauling materials in properly tarped or watertight containers;
- (e) Restricting vehicle speeds to 10 mph;
- (f) Covering excavated areas and material after excavation activity ceases; and
- (g) Reducing the excavation size and/or number of excavations.

Experience has shown that the chance of exceeding the 150 ug/m^3 action level is remote when the above-mentioned techniques are used. 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.



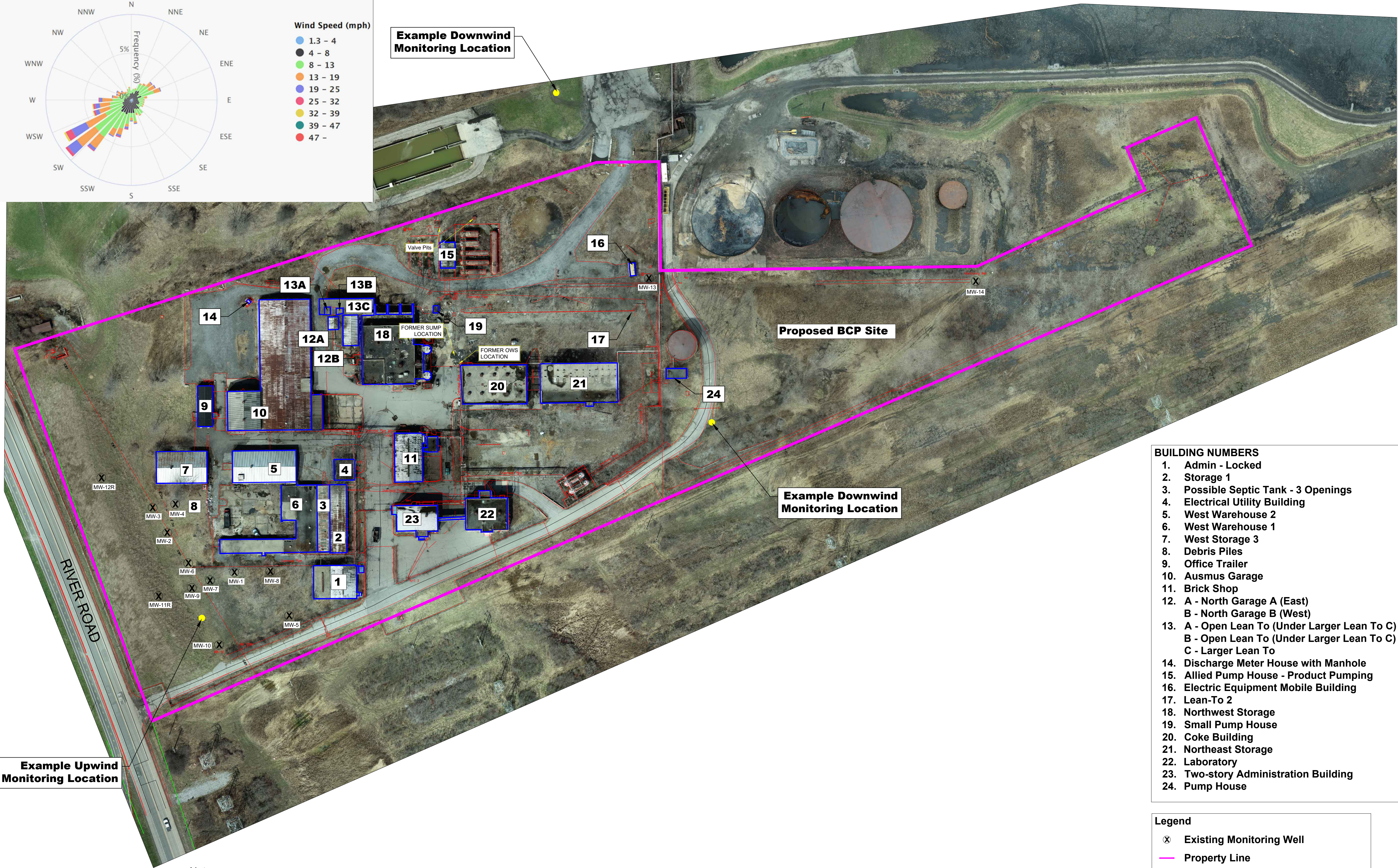
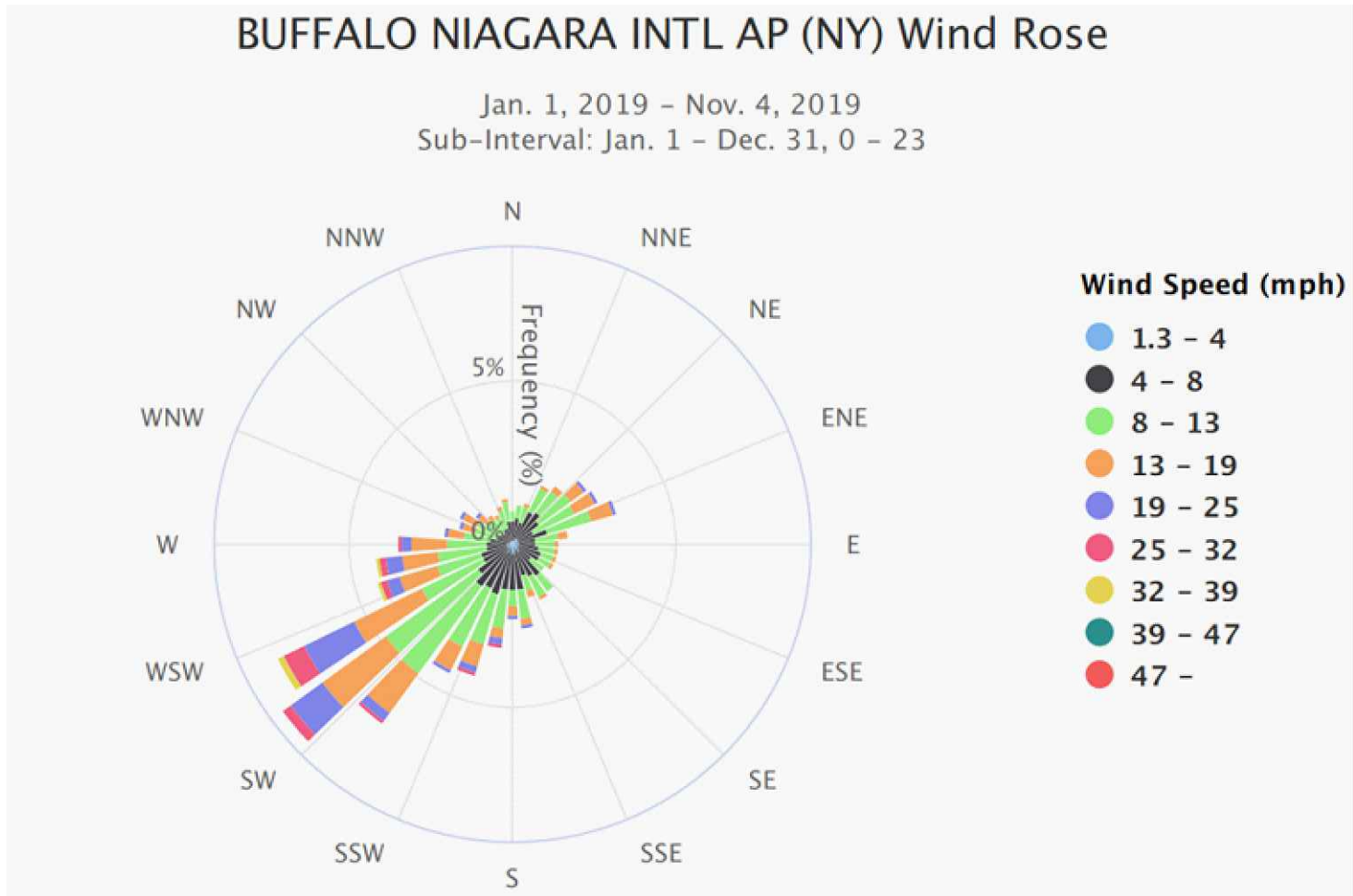
8. The evaluation of weather conditions is necessary for proper fugitive dust control. When extreme wind conditions make dust control ineffective, as a last resort remedial actions may need to be suspended. There may be situations that require fugitive dust suppression and particulate monitoring requirements 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.



Appendix A-2

Perimeter Air Monitoring Locations





- BUILDING NUMBERS**
1. Admin - Locked
 2. Storage 1
 3. Possible Septic Tank - 3 Openings
 4. Electrical Utility Building
 5. West Warehouse 2
 6. West Warehouse 1
 7. West Storage 3
 8. Debris Piles
 9. Office Trailer
 10. Ausmus Garage
 11. Brick Shop
 12. A - North Garage A (East)
B - North Garage B (West)
 13. A - Open Lean To (Under Larger Lean To C)
B - Open Lean To (Under Larger Lean To C)
C - Larger Lean To
 14. Discharge Meter House with Manhole
 15. Allied Pump House - Product Pumping
 16. Electric Equipment Mobile Building
 17. Lean-To 2
 18. Northwest Storage
 19. Small Pump House
 20. Coke Building
 21. Northeast Storage
 22. Laboratory
 23. Two-story Administration Building
 24. Pump House

- Legend**
- ⊗ Existing Monitoring Well
 - Property Line
 - Building
 - Site Features (Utilities & Structures)

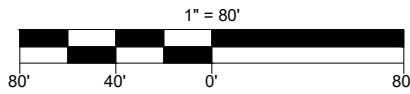
Note:

1. Downwind and upwind monitoring locations will be moved and relocated as necessary to account for active work areas.

References:

1. Parsons, 2021, Tonawanda Plastics Site NYSDEC ID 915003 Draft Site Investigation Summary Report
2. Niagara Boundary and Mapping Services, 2022, Site Aerial of 3821 River Road Tonawanda

D



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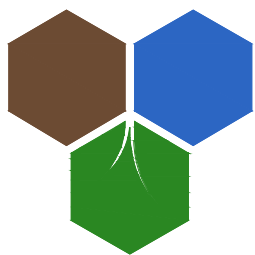


FIGURE 10
DRAWING NUMBER
RI WORKPLAN