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To: Benjamin McPherson (NYSDEC)

From: John Black (Inventum)

- CC: Jon Williams (Riverview); John Yensan (OSC); Craig Slater (CS Law); Todd Waldrop, P.E. and James Edwards (Inventum)
- RE: Site Management Work Plan Scope No. 2 Riverview Innovation & Technology Campus, Inc. Brownfield Cleanup Program Site No. C915353 Town of Tonawanda, New York

Inventum Engineering, P.C. (Engineering), on behalf of Riverview Innovation & Technology Campus, Inc. (Riverview), is submitting this second phase of activities (Scope No. 2) to be completed in accordance with the Site Management Work Plan (work plan). Table 3 and Figures 3, 4, and 5 (attached) will be appended to the New York State Department of Environmental Conservation (NYSDEC) approved IRM Work Plan for the Riverview Brownfield Cleanup Program (BCP) Site (#C915353) located at 3875 River Road, Tonawanda, New York.

Purpose

Stage No. 2 is designed to allow cleanup and materials management of the areas that lie within the North Central, North East and Central West areas of the grid. The specific activities are limited to those tasks listed on Table 3, at the locations shown on Figures 3, 4 and 5. It should be noted that some of the activities, are no action, or simply to replace covers on materials.

Activity No. 31, requires input and coordination with the DEC Bulk Storage group.

In accordance with the Site Management IRM Work Plan, no materials will be shipped without having been approved by the DEC and the DEC will be provided no less than 5 days' notice prior to any planned offsite transportation.

It should be noted that the wood from ties and pallets that cannot be reused onsite will be disposed offsite at a regional Subtitle D Landfill after sampling, profile approval and DEC Approval. Use as a fuel source, which would have been at a permitted offsite facility, is not viable at this time.

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Table



Map Designation	Ce	ll Ra	nge	Description	Action
7 (Continuation of Stage 1)	W1	to	AT2	Former rail track disrupted by rail removal. Continuation of Stage 1.	Consolidate ties, usable and unusable, pick plates and spikes as accessible, grade and compact area for trafficability.
26	W2	to	W3	EPA Stockpile Area	Stockpile area used by the USEPA. Maintain cover. There is additional volume available. Propose to use for placement of soils inadvertently excavated during the IRM.
27	Y4	to	Z5	Pallets, scrap wood, and scrap metal.	Clean wood to pallet pile (#60). Stained wood to stockpile pile for disposal.
28	W1	to	AD1	Fiberglass panels along fence line, tarp at railroad scale house, and plastic trash.	Disposal as C&D trash
29	AA2	to	AD3	Diesel Tank excavation and stockpiled soils.	Cover stockpiles. Consolidate materials around perimeter of pile if obviously erosion from pile. Area to be addressed during RI/FS/RA
30	Z6	to	AB6	Wood and plastic trash. White material that had been product on pallets.	Wood and plastic segregated. Clean wood to pallet pile (#60), plastic to C&D disposal, White material was battery wall coating, cover with polyethylene sheeting. To be characterized.
31	AC5	to	AC5	Caustic storage tank (ST10)	Remove caustic from the tank and secondary containment. Characterize and drum all material removed from tank and secondary containment. Excavate white stained soils located near crack in concrete and place into drums, label and sample. Decon tank and dispose offsite. Will have to be inspected by DEC Bulk Storage.

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 Management\Scope 2\Tables 3 Work Scope Number 2 _ 05 11 2020

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Map Designation	Cell Range		nge	Description	Action
32	AD5	to	AD5	Trash around the caustic unloading area. Plastic pipe, fiberglass panels, corrugated metal.	Segregate materials, plastic to C&D disposal, metal to recycling. Red pipe section (USEPA Test Cleaning Component) to be moved to tar management area (Grid T6 to V6). Cover ends with poly. Do not transport offsite.
33	AE3	to	AF3	Soil Pile - Origin Unknown	Cover and protect. To be addressed in RI/FS/RA.
34	AD3	to	AG3	Plastic and fiberglass trash along road.	Collect and dispose with C&D debris.
35	AF2	to	AF3	Soil Pile - Origin Unknown	Cover and protect. Consolidate materials around perimeter of pile if obviously erosion from pile.
36	AE6	to	AE6	Wood pallets NE corner of boiler building	Clean pallets to pallet pile. Stained pallets to stockpile for disposal.
37	AF4	to	AF4	Nominal 12-inch diameter corrugated HDPE pipe.	Stockpile for reuse on property.
38	AF5	to	AF5	Flexible corrugated HDPE tubing	Collect and dispose as C&D material.
39	AG5	to	AG6	Scrap wood, reusable (onsite) railroad ties, tires, and belting east of boiler house.	Segregate usable tires. Scrap wood to stockpile for disposal. Ties and belting for disposal.
40	AI3	to	AI3	Gravel pile, purchased for use as clean fill	Use as fill where required.
41	AK2	to	AN2	Soil Piles - Origin Unknown	Cover and protect. Consolidate materials around perimeter of pile if obviously erosion from pile. To be addressed in RI/FS/RA.
42	AL3	to	AM3	Corrugated roofing and siding. Possible transite.	Tested and contains ACM, dispose of panels and underlying soils appropriately.

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Map Designation	Cell Range		nge	Description	Action
43	AL4	to	AM4	Pile of scrap wood.	Segregate for stockpile or disposal.
44	AM5	to	AM6	C&D Materials	Leave in place. To be addressed during RI/FS/RA.
45	AN4	to	AO6	Coke Piles	Move to coke yard for management by Powers
46	AQ2	to	AS3	C&D materials. Pallet of materials from United Refractories.	Segregate metal for recycling. Balance of C&D materials to be addressed during RI/FS/RA. Pallet to be reused or disposed.
47	AR3	to	AS3	Rail car RC-10.	Check contents. If empty, cut for scrap. If solid or liquid contents, address in separate IRM.
48	AV2	to	AY3	Collection mains reportedly from Bethlehem Steel, Lackawanna	To be addressed in RA. Contained coke oven gas residuals.
49	BA1	to	BA1	Gondola Car RC-11	Scrap car. If filled with coal or coke, move to stockpile for Powers.
50	AF7	to	AQ8	Iron Oxide Pile	Do not disturb, Consolidate materials around perimeter of pile if obviously erosion from pile. Surround with Silt Fence. Materials to be addressed in RI/FS/RA
51	J9	to	010	Unused refractory	Recycle for new refractory, use for fill.
52	O9	to	P10	Scrap metal	Stockpile for recycling
53	J8	to	К8	Rail road wheels and car parts	Stockpile for recycling
54	Q10	to	Q10	Plastic piping and scrap metal	Segregate plastic for disposal, metal for recycling

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Map Designation	Cell Range		nge	Description	Action
55	AA8	to	AA8	Condensate Tank - ST8	Check contents. If empty, cut for scrap. If liquid or solid contents, collect samples of liquids and solids for characterization and address disposal
56	Z9	to	AB10	Segregate trash	Dispose of trash with C&D materials. Grade area to drain.
57	AC7	to	AE7	Supersacks of coke breeze.	Move to coke yard for management by Powers.
58	AD9	to	AF10	Trash on the former baghouse slab area.	Separate recyclable materials, trash and clean wood for pallet pile (#60).
59	AF9	to	AI9	Metal scrap	Stockpile metal for recycling
60	AR12	to	AV13	Clean pile of wood	Shred and stockpile for sampling and characterization.
61	Z11, AF15 to AH15, AP14 to AQ15		o AH15, AQ15	Gondola cars	Dump cars to move coke for Powers management, scrap cars
62	AQ15	to	AU16	Wood scrap pile	Segregate clean v stained. Clean wood to pile for shredding for use onsite, stained stockpile or shred for disposal. Segregate any non-wood materials for disposal.
63	AL15	to	AL15	Trash pile, east end of Thaw Shed	Dispose of trash with C&D materials.
64	E9	to	F10	Pallets and wood on former ammonia building foundation	Segregate clean v stained. Clean to stockpile for use onsite, unuable or stained stockpile for offsite disposal.
65	D14	to	D15	Gondola Car RC-29	Empty coke for management by Powers, scrap car.
66	D18	to	D18	Old belting	Segregate for disposal
67	E24	to	E25	Old buckets of mortar	Dispose of trash with C&D materials.

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Map Designation	Cell Range		nge	Description	Action
68	G21	to	G21	Old vac truck	Check tank, if empty, scrap truck. If solid or liquid contents address in separate IRM.
69		to		Former coal and coke handling equipment	Scrap
70	K21	to	M21	Old screens	Stockpile for recycling





