

June 21, 2017

Ms. Karen Cahill
NYS Department of Environmental Conservation
Division of Environmental Remediation
615 Erie Boulevard, West
Syracuse, New York 13204

Re: Interim Remedial Measure Completion Report
800 Hiawatha Boulevard West (former Roth Steel site)
NYSDEC BCP Site #C734083

Dear Ms. Cahill:

On behalf of the Onondaga County Industrial Development Agency (OCIDA), Spectra Engineering, Architecture and Surveying, P.C. is submitting this Interim Remedial Measure (IRM) Completion Report.

This report summarizes IRM activities that were proposed in the “Revised Interim Remedial Measures Work Plan”, dated October 2016. That Work Plan, which was approved by NYSDEC on October 25, 2016, proposed IRM cleanup activities related to three matters: drums and miscellaneous waste contained in Buildings 4 and 5; two large above-grade ASR Piles; and a portion of the Site where the Onondaga Lake Trail Extension Project is proposed to be constructed.

This report summarizes the activities completed between November 2016 and March 2017 related to drum/miscellaneous waste materials and the two ASR piles. Work has not yet been undertaken for the Trail since final design and approval for that project is still pending.

At the request of NYSDEC, Spectra has prepared this report to document the IRM activities completed to date.

DRUMS AND MISCELLANEOUS WASTE REMOVAL

As proposed in the Revised IRM Work Plan, OCIDA removed and disposed of various 55 gallon drums (oils, automotive fluids, rainwater), assorted plastic containers, aerosol cans, paint cans, and drilling wastes (soil, drilling fluid) that were temporarily stored in Building 5. In addition, a drum of suspected PCB capacitors, found in Building 4, was also removed from the site. Prior to removing the PCB capacitors, a certified asbestos abatement contractor (Asbestos Environmental Services, Inc.) entered Building 4 on November 19, 2016, placed the capacitors in sealed plastic bags, and moved them into Building 5. This material was treated as “asbestos-contaminated” due to the presence of broken floor tiles near the capacitor drum that contained asbestos. The “bagging” of the capacitors was conducted in accordance with a plan approved by the New York State Department of Labor (NYSDOL). The drum that contained the capacitors was also bagged and treated as PCB/asbestos waste. Attachment 1 contains the proposed asbestos variance plan, NYSDOL plan approval, and a work completion statement prepared by Asbestos Environmental Services.

As indicated in the Revised IRM Work Plan, the various waste materials in Building 5 were segregated into groups of “like” materials by Spectra and its subcontractor (Veolia Environmental Services) based on physical appearance of the contents and any existing labels. Sixteen composite samples were collected from the waste materials on August 3, 2016 and submitted to Test America for analysis of VOC, metals, PCBs, or physical properties, depending on the waste type. Based upon the results of this initial composite sampling, additional samples of certain individual containers were collected on September 14, 2016 and sent to the lab for further evaluation of VOCs, PCBs, flashpoint, or pH. Analytical results for the drum testing are provided on a CD in Attachment 2.

Based upon the laboratory testing, the majority of the materials were non-hazardous. However, two drums from group K (K1, K4) were classified as hazardous based on benzene; one drum from group K (K5) was classified hazardous based on tetrachloroethylene; and one drilling waste water container (WW2) was hazardous because of an elevated pH level. In addition, a drum labeled as mineral spirits and a lab pack with miscellaneous small containers (e.g. aerosol cans, paints) were classified as ignitable hazardous waste.

Between December 22, 2016 and January 23, 2017, Veolia picked up and transported the waste materials to off-site disposal facilities. The majority of the wastes (hazardous and non-hazardous) were taken to the Veolia facility in West Carrollton, Ohio. The PCB/asbestos waste was taken to a U.S. Ecology facility in Belleville, Michigan. Several empty metal drums, containing no wastes, were taken to Kearny Steel in Newark, New Jersey. In total, 56 drums of “auto waste” liquids were removed, including the three that were classified as hazardous waste. Removal also included 11 drums of drill cuttings, 7 rainwater drums, three 250 gallon totes of drilling fluid (one of which was hazardous waste), one drum of DECON water, one drum of mineral spirits, the capacitor/asbestos materials, one drum of PPE, and one lab pack of aerosol cans/paints. Copies of the waste manifests for these materials are provided in Attachment 3.

REMOVAL OF ASR WASTE PILES 1 AND 2

As indicated in the Revised IRM Work Plan, two large aboveground ASR Piles were proposed to be excavated and taken for off-site disposal. In an October 28, 2016 correspondence to Spectra, USEPA indicated that it would be acceptable for this waste to be disposed of at a permitted solid waste landfill, in accordance with 40 CFR 761.62 (b). During the process of arranging for disposal at such a facility, NYSDEC Materials Management Staff in Region 8 requested additional TCLP testing to further evaluate lead concentrations. On December 14, 2016, Spectra and Abscope Environmental utilized an excavator to collect eight additional samples, four from each pile. Those samples were analyzed by Test America for TCLP lead with the results ranging from 0.20 – 0.63 mg/l, which are all less than the hazardous waste threshold of 5 mg/l. Prior to leaving the Site, the excavator was decontaminated and the fluids were containerized in Building 5 for subsequent removal by Veolia. On January 11, 2017, NYSDEC issued a letter approving the use of ASR wastes as Alternative Daily Cover at the Ontario County landfill. This is a NYSDEC-permitted solid waste facility. Seneca Meadows Landfill, a similarly-permitted facility, also agreed to accept the waste as daily cover. Attachment 4 contains the December 2016 analytical results and NYSDEC’s BUD approval.

Between February 20 and March 7, 2017, Neu-velle, LLC, with Spectra oversight, removed approximately 2,545 tons of ASR waste from the site. NYSDEC was also present during some of the ASR removal activities. The ASR waste was excavated, loaded and transported to Ontario County and Seneca Meadows Landfills. In total, 98 truckloads of waste were removed with individual loads ranging from 9.3 to 40.3 tons. Attachment 4 contains an inventory of all of the ASR waste loads,

their destinations, and manifest numbers. Upwind and downwind CAMP monitoring was performed during the excavation and loading process in accordance with the Work Plan. No air monitoring thresholds were exceeded. Of the 2,545 tons of ASR that were removed, 1,778 tons went to Seneca Meadows Landfill and 767 tons were taken to the Ontario County Landfill. At the completion of the project, the excavating equipment was decontaminated and the resulting liquid was drummed and taken to Covanta Environmental Solutions in Niagara Falls (see Attachment 4).

ONONDAGA LAKE TRAIL EXTENSION

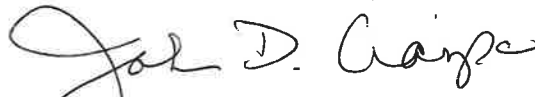
Additional IRM activities related to the Trail construction were also proposed in Spectra's October 2016 Revised IRM Work Plan and a related Self-Implementing Cleanup and Disposal Notification, submitted to USEPA in December 2016. Both of those plans proposed sampling, excavation, and capping in connection with Trail construction.

Additional sampling requirements were specified in Spectra's February 17, 2017 Notification Amendment (submitted to USEPA) and NYSDEC's May 18, 2017 comment letter on the Design Report (March 2017) for the Trail. Spectra will complete the required sampling program once a final design has been prepared for the pedestrian bridge piers to be constructed on the Roth Steel site. Those sampling results will be transmitted to NYSDEC and USEPA, along with detailed excavation/capping plans in the vicinity of the piers and along the trail.

If you have any questions on these activities, do not hesitate to contact me at (518) 782-0882 or jciampa@spectraenv.com.

Yours truly,

SPECTRA ENGINEERING, ARCHITECTURE
AND SURVEYING, P.C.



John D. Ciampa, P.G.
Director of Environmental Remediation

Attachments

cc w/ att.: I. Harris, OCIDA
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ATTACHMENT 1
ASBESTOS RELATED DOCUMENTATION

ATTACHMENT 2
DRUM TESTING ANALYTICAL RESULTS
ON CD

ATTACHMENT 3
DRUM AND MISCELLANEOUS WASTE MANIFESTS

ATTACHMENT 4
ASR PILES 1 AND 2: ANALYTICAL RESULTS,
NYSDEC BUD APPROVAL, WASTE-LOAD RECORDS