



July 19, 2020

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. 3
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 third phase of activities (Scope No. 3) to be completed in accordance with the Site Management Work Plan (work plan). Table 4 and Figures 3-1 through 3-4 (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. 3 is designed to allow container sweeping of the buildings and cleanup and materials management of the areas that lie within the South West, Central East and South Central areas of the grid. The specific activities are limited to those tasks listed on Table 4, at the locations shown on Figures 3–1 to 3-4. It should be noted that some of the activities, are no action, or simply to place or replace covers on materials.

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 (damaged, degraded or numbers in excess of what are needed) 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.

Specific Actions – Stage 3

The specific Stage 3 actions are listed in Table 4. Notably:

- No. 50 – This action is a supplement to Action No. 50 in Stage No. 2. The identification and unearthing of the Box Culvert that terminates at the compressor building has allowed definition

of the watershed for the Box Culvert. The iron oxide pile is potentially in the watershed. The revised action No. 50 will allow consolidation of the iron oxide pile and covering with polyethylene sheeting to prevent contact with precipitation.

- No. 71 – A flooded shaft that was likely associated with the coal conveyor and a former car shaker was identified at this location. Caution must be taken in the area and after removal of the debris, the opening should be surrounded with caution tape or other warning materials.
- No. 74 – The pile of material at this location contains tar, the pile should be covered with polyethylene sheeting.
- No. 75 – Rail car RC-04 has rusted through. If confirmed to be empty, cut for scrap. If not empty, flag for sampling.
- Nos. 79N and 79S – Two piles of mixed coal and coke that are not suitable for offsite use. Pile 79N has visible tar seeps and will be covered in place for future decision on management. Pile 79S has no visible tar like materials on the surface and will be used as fill in a coal yard excavation. If tar like materials are encountered in Pile 79S, the excavation and use as fill will stop and the remaining materials will be covered in place.
- No. 80 – The surface materials in the area have a blue tint. After the mixing pad is dewatered, the surface materials outside the mixing pad entrance will be consolidated in a pile, covered, and identified with a sign. The access to the mixing pad will be covered with a geotextile and crushed stone to provide access. Sampling of the stockpiled material removed from the entrance area will be completed during the remedial investigation.
- No. 82 - A flooded shaft that was likely associated with the coal conveyor was identified at this location. Caution must be taken in the area and after removal of the debris, the opening should be surrounded with caution tape or other warning materials. The catch basin CB-08 is immediately west of the shaft, protect and clear of any soil or debris.
- No. 84 – The contents, if any, of the three abandoned rail cars (RC01, RC02, and RC03) on the south rail tracks are unknown. Gauge the depth to the materials, if any, in the rail cars. If there are contents, the contents will be sampled and characterized. It is reported that the USEPA identified, but did not test, tar like materials in one or more of these rail cars. If the tank cars are empty, the cars will be cut and prepared for scrap.



Table



Table 4
 Site Management
 Work Scope 3
 NorthSouth Waste, South Central, and Central West Sections of Property
 Riverview Innovation Technology Campus, In.
 Tonawanda, New York

Map Designation	Cell Range		Description	Action
50	AF7	to AQ8	Iron Oxide Pile, possible source of iron in surface water within the box culvert.	Push materials that have eroded onto perimeter back onto pile/inside former purifier boxes. Cover with polyethylene sheeting. Anchor perimeter to reduce contact with surface water.
71	AC17	to AC18	Debris pile and tunnel shaft (Foundations were former car shaker to unload rail cars onto coal conveyor)	Caution - open pit. Install warning barrier around shaft, remove and manage materials as C&D, possible low point to dewater tunnel.
72	AO20	to AO20	Debris pile.	Remove and manage materials as C&D.
73	AR21	to AT19	Old belting and debris on former tank foundations.	Remove and manage materials as C&D, cut a path through the coke to allow access for RI.
74	AM20	to AN20	Pile of mixed coal, coke and tar.	Do not disturb, cover with polyethylene sheeting.
75	AP22	to AP22	Rail Car RC04. Note bottom rusted through.	Confirm tank is empty. Cut for scrap. If tar is visible below tank on ground, try not to disturb, notify Keith.
76	AW16	to AX17	Piles of railroad ties.	Sort ties in accordance with practice, usable and unusable. Dispose unusable/excess offsite.
77	AZ15	to BB17	Old wooden trestle materials in a random pile.	Sort as usable v unusable wood. Dispose unusable/excess offsite.
78	AH24	to AH25	Old railroad track, some rail and ties.	Recover loose metal and materials, leave below grade materials. Recover any ties and rail components during coal and coke recovery. Remainder of subgrade materials will be addressed by the AA/RA or an IRM.
79N	AG23	to AH24	Mixed coal and coke piles. Not marketable as coal or coke. Visible tar like materials.	Cover and Label "Mixed Coal and Coke, Some Tar Like Materials".
79S	AG24	to AH25	Mixed coal and coke piles. Not marketable as coal or coke.	Use as fill in coal yard as long as no visible tar like materials.

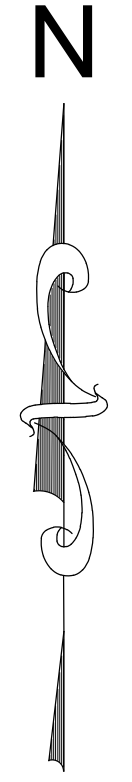
Table 4
 Site Management
 Work Scope 3
 NorthSouth Waste, South Central, and Central West Sections of Property
 Riverview Innovation Technology Campus, In.
 Tonawanda, New York

Map Designation	Cell Range			Description	Action
80	AH24	to	AH24	Blue tinged soil east of mixing pad entrance.	Stockpile near the mixing pad out of the treatment and traffic areas. Cover with polyethylene sheeting and place sign "Entrance Materials, Do Not Disturb".
81	AE25	to	AH25	Debris south of mixing pad.	Remove and manage materials as C&D.
82	AJ25	to	AI26	Debris at South end of coal conveyor.	Caution - open pit. Install warning barrier around opening, remove and manage materials as C&D, possible access point to test for ACM in tunnel. Catch Basin (CB-08) is immediately west of the tunnel opening, protect the catch basin and clean out any soil or debris in drop inlet.
83	AK27	to	T35	South Rail	Remove and recycle rail, plates and spikes. Sort rail road ties as other - usable v not usable.
84	X34	to	Y33	Rail Cars RC01, RC02, and RC03.	Caution - contents unknown. One or more reportedly had contents according to the USEPA, no data collected. Open and check for contents. If contents, gauge depth/quantity and collect sample for hazardous waste characteristics. If empty, cut up for scrap.
85	J27	to	J27	Blue poly drums in storm water detention basin.	Remove and place in container storage area. Add to inventory.
86	I26	to	I26	Former spray head pumps	Scrap
87	H31	to	I31	Scrap pipe, tank and hoses. Tank is the green tank leaning against the brick structure. Not one of the installed numbered tanks.	Remove and manage as scrap and C&D. Verify small green tank is empty. Characterize contents if not empty.
88	G29	to	G29	Wooden deck for sediment gauge access (Check all ponds)	Not stable, remove and dispose as C&D. If no other access to sediment gauges, discuss replacement with Inventum.

Figures

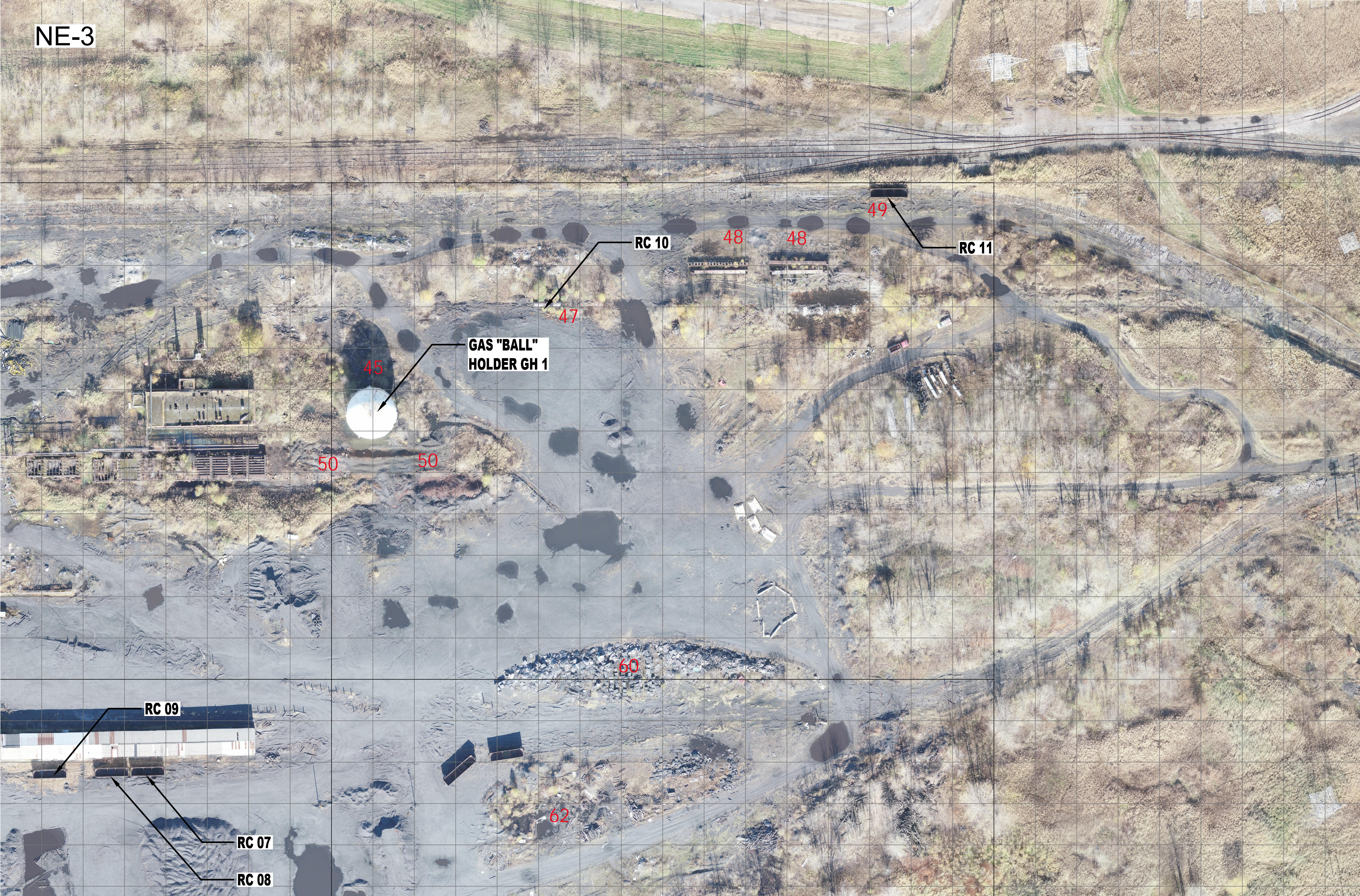


AF AG AH AI AJ AK AL AM AN AO AP AQ AR AS AT AU AV AW AX AY AZ BA BB BC BD BE BF BG BH BI BJ BK BL

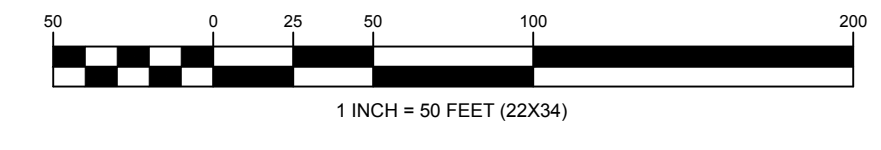


NE-3

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17



D



DRAWING BY	PROPERTY OF INVENTUM ENGINEERING
CHECKED	IMPORTANT: THIS DRAWING PRINT IS LOANED FOR MUTUAL ASSISTANCE AND AS SUCH IS SUBJECT TO RECALL AT ANY TIME WITHOUT NOTICE. IT IS NOT TO BE REPRODUCED OR REPLICATED IN ANY FORM FOR THE BENEFIT OF PARTIES OTHER THAN NECESSARY PARTNERS, FINANCIAL INSTITUTIONS, SUBSIDIARIES, OR AGENTS OF INVENTUM ENGINEERING.
APPROVED	NOTICE: THIS DRAWING HAS BEEN PREPARED UNDER THE SUPERVISION AND CONTROL OF A LICENSED PROFESSIONAL ENGINEER. IT IS NOT TO BE USED FOR ANY PURPOSES WITHOUT THE WRITTEN CONSENT OF INVENTUM ENGINEERING.

**NORTH EAST SECTION OF PROPERTY
TANKS AND RAIL CARS**

**(NEW SET) INVENTUM
ENGINEERING**
481 CARLISLE DRIVE
SUITE 202
HERNDON, VIRGINIA 20170
(703) 722-6049
www.inventumEng.com

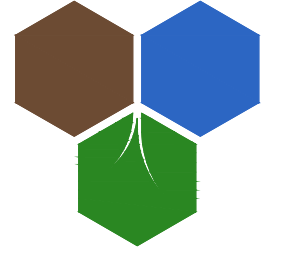
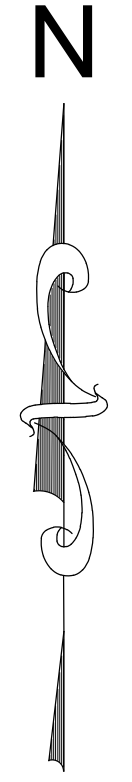
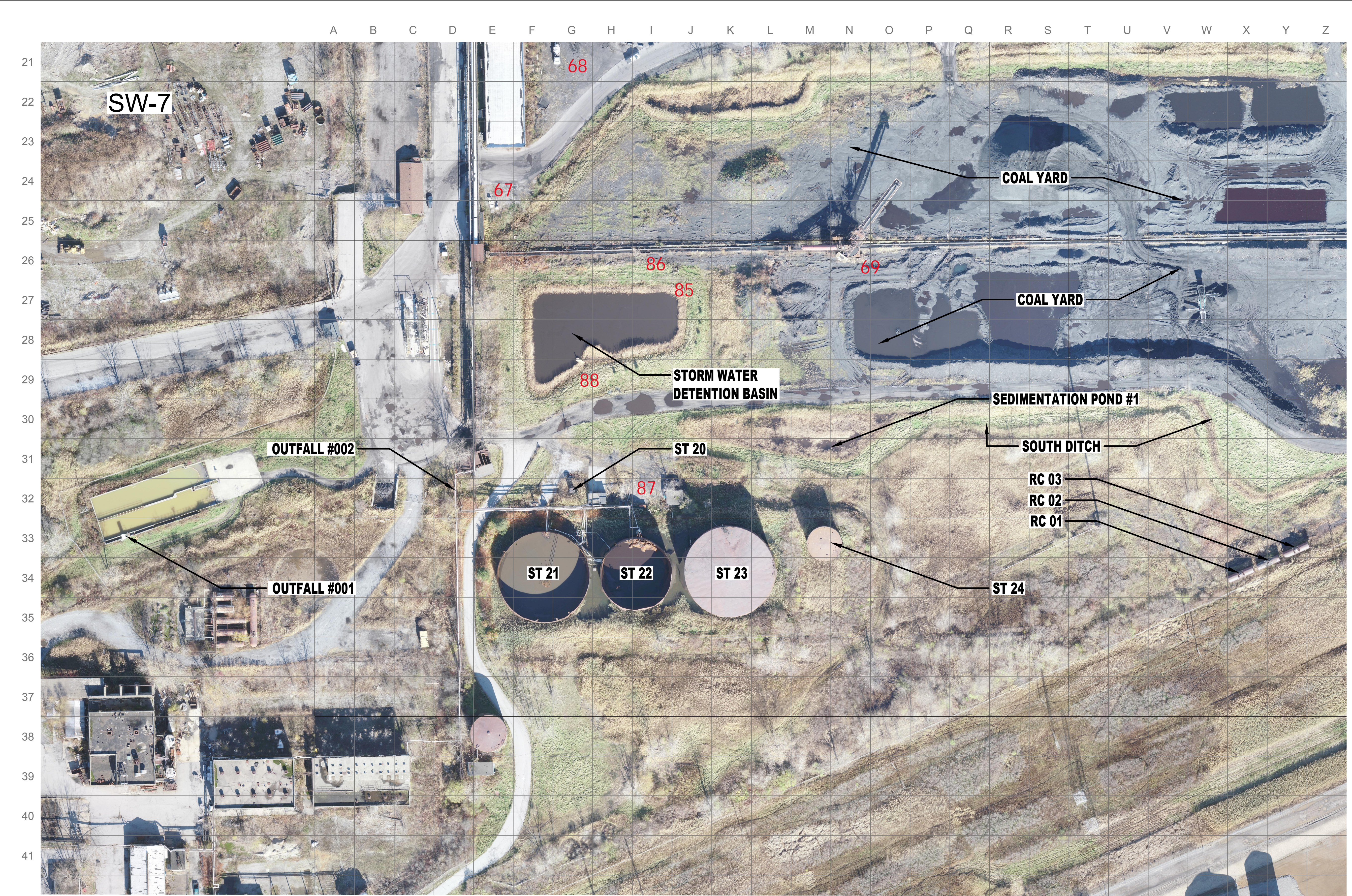


FIGURE 3-1
DRAWING NUMBER
107A



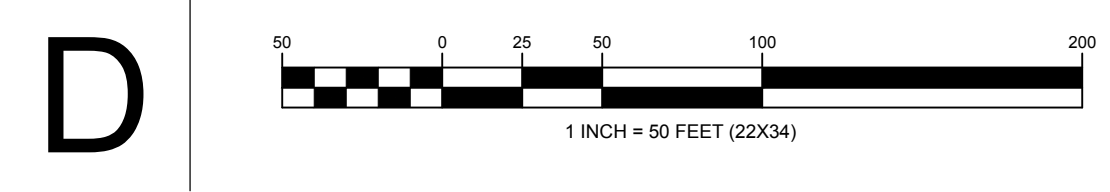
DRAWING BY	PROPERTY OF INVENTUM ENGINEERING
CHECKED	IMPORTANT: THIS DRAWING PRINT IS LOANED FOR MUTUAL ASSISTANCE AND AS SUCH IS SUBJECT TO RECALL AT ANY TIME WITHOUT NOTICE. ANY REPRODUCTION OR TRANSMISSION OF THIS DRAWING IN ANY FORM FOR THE BENEFIT OF PARTIES OTHER THAN NECESSARY PARTNERS, FINANCIAL INSTITUTIONS, SUBSIDIARIES, OR AGENTS OF INVENTUM ENGINEERING WITHOUT THE WRITTEN CONSENT OF INVENTUM ENGINEERING.
APPROVED	NOTICE: THIS DRAWING HAS BEEN PREPARED UNDER THE AUTHORITY OF A LICENSED PROFESSIONAL ENGINEER. ANY VIOLATION OF STATE LAW FOR ANY PERSONS UNLESS ACTING UNDER THE DIRECTION OF A LICENSED PROFESSIONAL ENGINEER, TO ALTER THIS DOCUMENT IN ANY WAY.

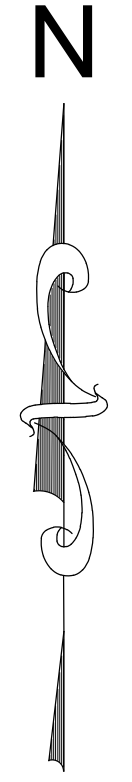
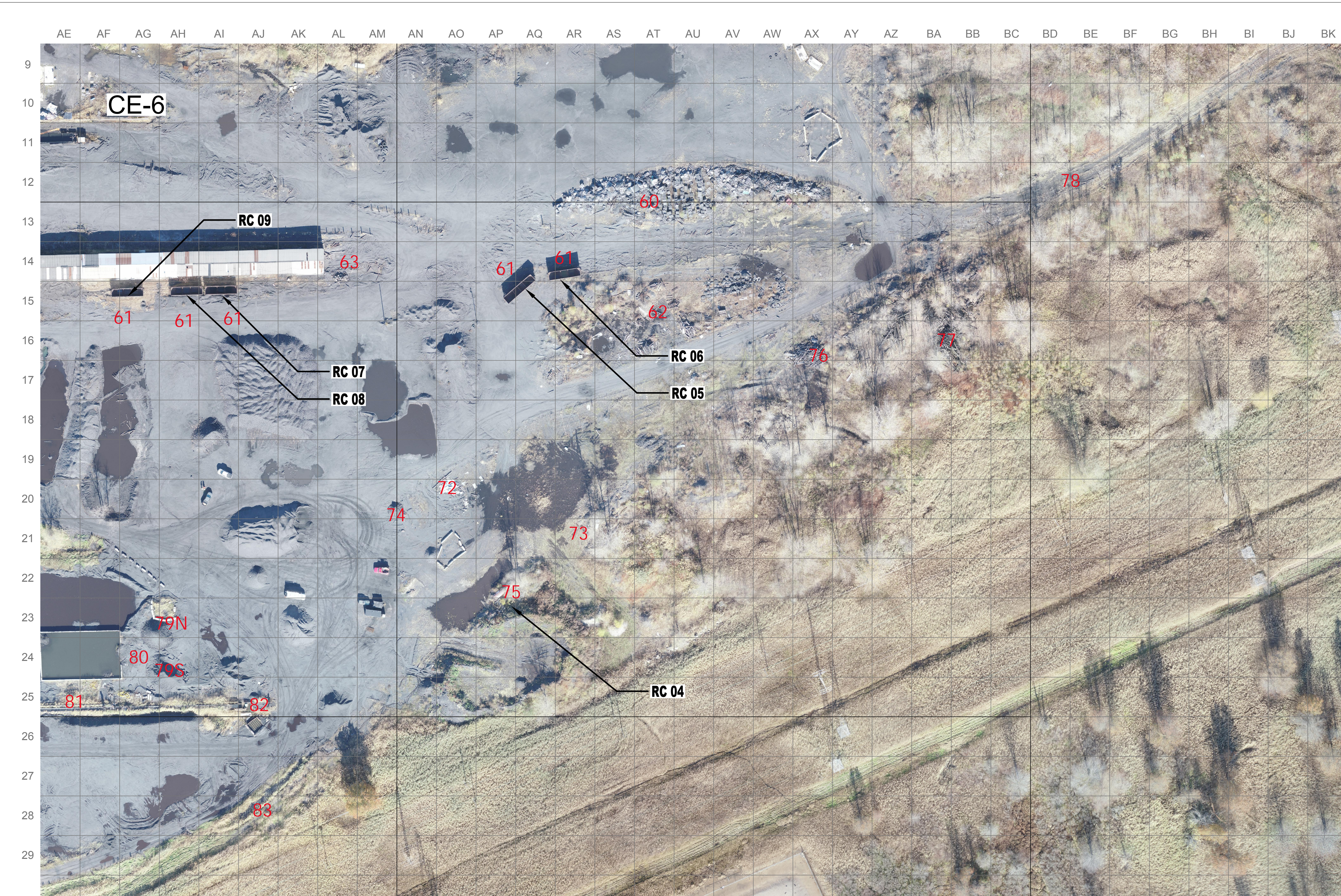
--	--

**SOUTH WEST SECTION OF PROPERTY
TANKS AND RAIL CARS**

INVENTUM ENGINEERING
 481 CARLISLE DRIVE
 SUITE 202
 HERNDON, VIRGINIA 20170
 (703) 722-6049
www.inventumeng.com

FIGURE 3-2
DRAWING NUMBER
107A





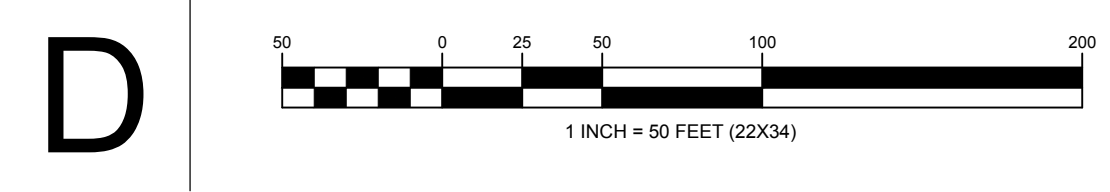
DRAWING BY	PROPERTY OF INVENTUM ENGINEERING
CHECKED	IMPORTANT: THIS DRAWING PRINT IS LOANED FOR MUTUAL ASSISTANCE AND AS SUCH IS SUBJECT TO RECALL AT ANY TIME WITHOUT NOTICE. IT IS NOT TO BE REPRODUCED OR REPLICATED IN ANY FORM FOR THE BENEFIT OF PARTIES OTHER THAN NECESSARY PARTNERS, FINANCIAL INSTITUTIONS, SUBSIDIARIES, OR AGENTS OF INVENTUM ENGINEERING.
APPROVED	NOTICE: THIS DRAWING HAS BEEN PREPARED UNDER THE AUTHORITY OF A LICENSED PROFESSIONAL ENGINEER ACTING UNDER THE DIRECTION OF A LICENSED PROFESSIONAL ENGINEER. TO ALTER THIS DOCUMENT IN ANY WAY.

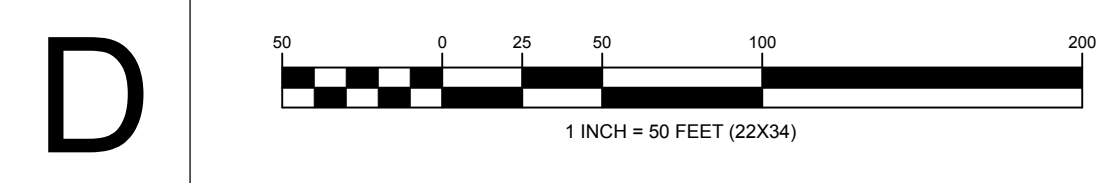
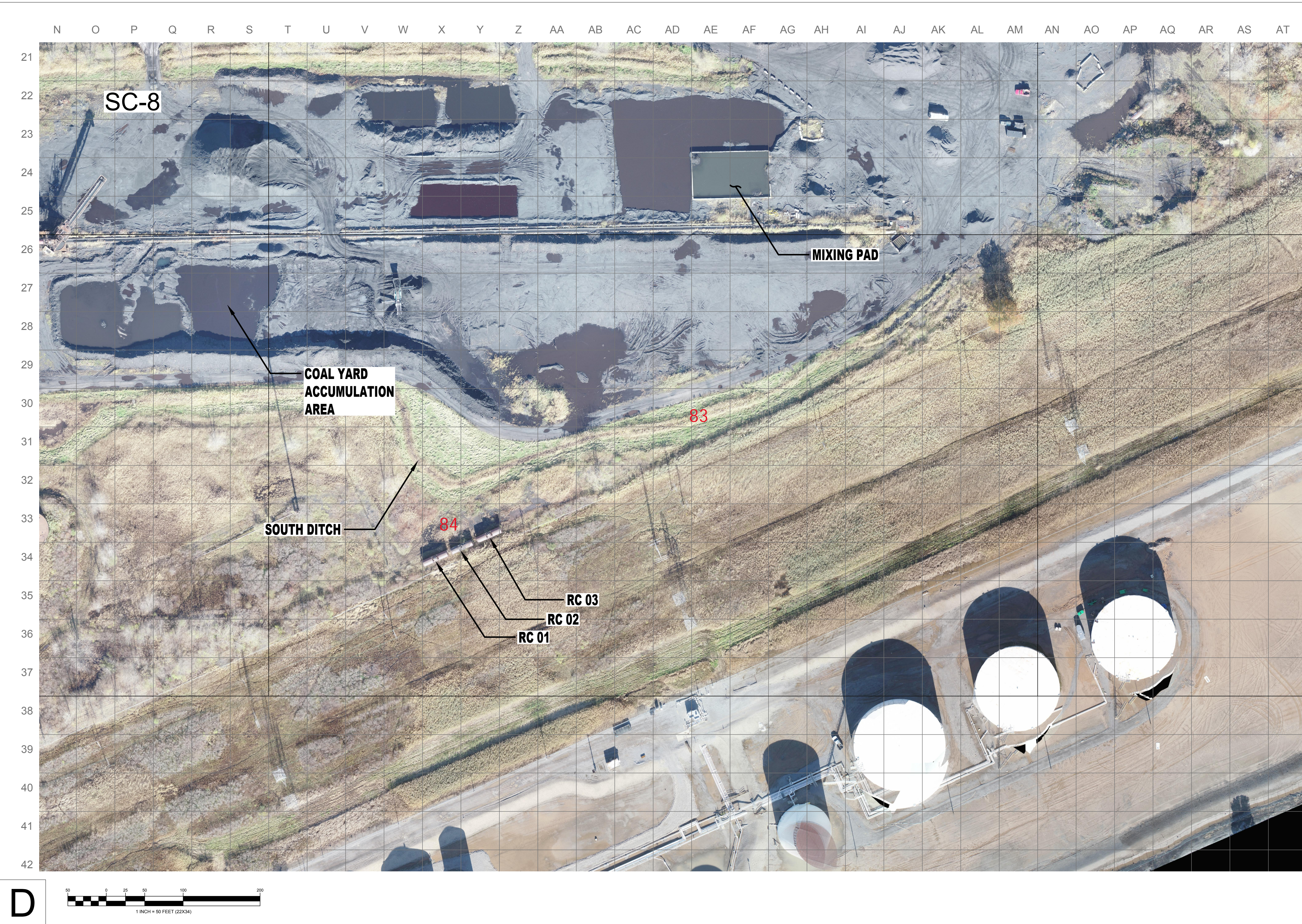
PROPERTY OF INVENTUM ENGINEERING

**CENTRAL EAST SECTION OF PROPERTY
TANKS AND RAIL CARS**

**(NEW SET) INVENTUM
ENGINEERING**
481 CARLISLE DRIVE
SUITE 202
HERNDON, VIRGINIA 20170
(703) 722-6049
www.inventumEng.com

FIGURE 3-3
DRAWING NUMBER
107A





DRAWING BY	PROPERTY OF INVENTUM ENGINEERING
CHECKED	IMPORTANT: THIS DRAWING PRINT IS LOANED FOR MUTUAL ASSISTANCE AND AS SUCH IS SUBJECT TO RECALL AT ANY TIME WITHOUT NOTICE. ANY REPRODUCTION OR TRANSMISSION OF THIS DRAWING IN ANY FORM FOR THE BENEFIT OF PARTIES OTHER THAN NECESSARY PARTNERS, FINANCIAL INSTITUTIONS, SUBSIDIARIES, OR AFFILIATES OF INVENTUM ENGINEERING IS STRICTLY PROHIBITED.
APPROVED	NOTICE: THIS DRAWING HAS BEEN PREPARED UNDER THE AUTHORITY OF A LICENSED PROFESSIONAL ENGINEER, REGISTERED UNDER THE PROVISIONS OF THE VIRGINIA BOARD OF PROFESSIONAL ENGINEERS. ANY VIOLATION OF STATE LAWS OR ANY PERSONS UNLAWFULLY ACTING UNDER THE DIRECTION OF A LICENSED PROFESSIONAL ENGINEER TO ALTER THIS DOCUMENT IN ANY WAY.

**SOUTH CENTRAL SECTION OF PROPERTY
TANKS AND RAIL CARS**

**(NEW SET) INVENTUM
ENGINEERING**
481 CARLISLE DRIVE
SUITE 202
HERNDON, VIRGINIA 20170
(703) 722-6049
www.inventumEng.com

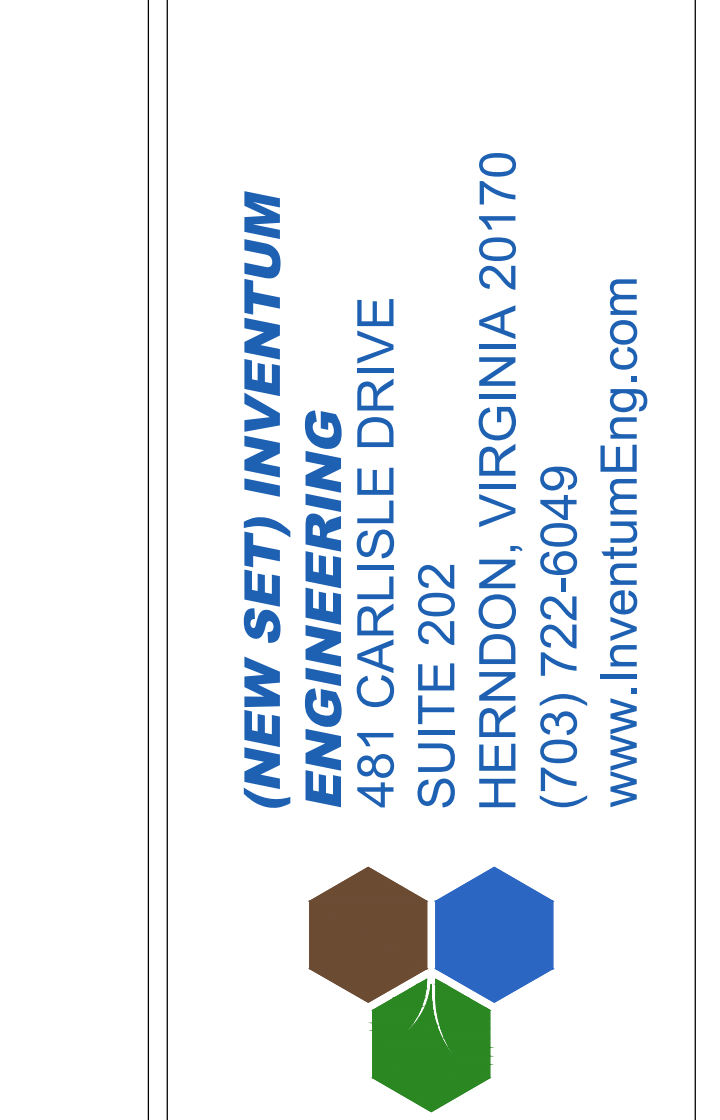


FIGURE 3-4
DRAWING NUMBER
107A