

April 18, 2020

To: Benjamin McPherson (NYSDEC)

From: Todd Waldrop (Inventum)

CC: Jon Williams (Riverview); John Yensan (OSC); Craig Slater (CS Law); John Black, P.E. and James Edwards (Inventum)

RE: Interim Site Management Work Plan
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 Interim Site Management Work Plan (work plan) to the New York State Department of Environmental Conservation (NYSDEC) for the Riverview Brownfield Cleanup Program (BCP) Site (#C915353) located at 3875 River Road, Tonawanda, New York.

Purpose

The property management at 3875 River Road (Figure 1) has transitioned from the former Tonawanda Coke Corporation (TCC), to the U.S. Environmental Protection Agency (USEPA), and to Riverview. For purposes of this and future work plans significant features of the site have been grouped into Areas of Investigation (Figure 2) and labeled or numbered and are referenced to a site grid (Key Plan Figures 1 to 9, Appendix A).

There are four components of the Interim Site Management that are addressed by this work plan:

- Security,
- Site Controls.
- Cutting Natural Materials; and
- Housekeeping/General Site Cleanup/Removal of Recyclable Materials.

Surface water management, Asbestos Containing Materials (ACM) maintenance and abatement, tank residuals, tank rail cars, containers and contained liquids and solids, and management of liquids accumulating in containment areas will be addressed under separate work plans.

The stockpiles and piles of “reject materials” accumulated by Powers Coal and Coke will be managed under the Excavation Plan to be prepared on behalf of Powers.

Security

Security has been provided in accordance with the direction of the USEPA since the property ownership transitioned from TCC to Riverview. In accordance with the direction given by the USEPA, Riverview has:

- Provided security onsite 24 hours per day 7 days per week.
- Procured and is installing security cameras to remotely monitor portions of the site.
- Repaired the gate and fence at the entrance to the site.
- Placed construction fencing across building and structure openings that were deemed to pose a potential physical hazard at the 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 production area of the site from the guard building.
- Maintain construction fencing across openings that were deemed to pose a potential physical hazard within the site; and
- Conduct daily patrols to ensure the perimeter fence (where it exists) is intact.

Site Controls

The site appearance suggests that the property had been largely uncontrolled for years. Little documentation can be located to confirm daily inspections, maintenance of electrical equipment, management of plumbing and piping and maintenance of surfaces across the property. If these utilities and facilities are not maintained the safety to on-site workers and visitors and the ability to manage liquids on the property would be tremendously impeded. Riverview has hired two full time staff, formerly employees of the USEPA Emergency Response Contractor; and has developed, daily, weekly and monthly inspection checklists (Attachment B) to guide the staff in ensuring required site controls are maintained. Inventum has full time technical site management staff to provide the necessary resources to address conditions identified by the daily, weekly and monthly inspections, and to conduct the required sample collection activities.

The condition of the facilities has created concerns in the community. As one means of quantifying the control Riverview has implemented at the site, three perimeter air monitors will be installed around the site and a weather station will be established. The proposed locations of the air monitoring stations are shown on Figure 3. These locations were based on the Wind Rose from the Buffalo Airport shown on the figure. As site specific wind direction data is collected, the locations may be modified. The perimeter monitors will provide up wind and downwind particulate and total volatile organic compound measurements to provide an understanding of current site conditions and a baseline for air quality during remedial actions. The weather station will provide onsite, real time, continuous monitoring of wind direction and speed, temperature and other climatic data to correlate with the air quality monitoring data.



Scope of Work

Under the site controls tasks, Riverview will:

- Provide full time staff on the property to conduct inspections of critical components of the remaining facilities.
- Conduct daily, weekly and monthly¹ inspections (Attachment B) of the equipment and facilities on the property (Figures 1 through 9 [Attachment A], Table 1 of Attachment B).
- Monitor and report any conditions that require action associated with; insulation conditions, liquid levels in containment areas, container inventories (Attachment B).
- Receive and document deliveries of fuels.
- Provide access for site maintenance where obstructed by materials abandoned by former owner.
- Maintain access for liquids management including but not limited to debris and snow removal.
- Maintain critical pumps and containment equipment; and
- Support responses to conditions on the property.

Cutting Invasive Growth

The maintenance of the grounds during the later years of TCC operation appears to have been limited. As a result, there are significant trees, shrubs and undergrowth obstructing access 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 grown on and over materials on the site that must be evaluated to determine how to properly manage the entire BCP Site. Trees and larger shrubs will be left in place. Non-woody, brush and smaller shrubs must be mowed to allow proper investigation and management of the onsite materials. Grasses and light brush will be cut and allowed to fall and biodegrade in place.

The materials are largely in the areas along the property boundary and on the north and south sides of site 110. The east ends of AOI-1 and AOI -7 (Figure 2), and the area in the vicinity of Rail Cars RC-01 to RC-03 (Figure 9 of Attachment A) will be cut.

Housekeeping/Surface Debris Cleanup/Removal of Recyclable Materials

The care and housekeeping under the later years of TCC operation appears to have been limited. During the USEPA term of care they did not have custody of materials or assets on the surface or the mandate to remove surface debris. As a result of the lack of care, and apparently greatly exacerbated by an auction and subsequent removal of the auctioned materials, the site has equipment, debris and rubble scattered throughout. This material presents safety and access issues over the majority of the property. The materials will be organized, and some materials will be removed under this Work Plan to facilitate access for the RI. The materials will be organized and removed in accordance with specific Work Scopes to be attached to this Work Plan. Work Scope No. 1 is for the northwest section of the property as

¹ These will be in addition to those inspections required in accordance with the SWPPP.



shown in Attachment C – Work Scopes. The Work Scopes will apply to specific areas and materials at the site.

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 under a Work Scope. Any potentially contaminated soil or by-product materials that are actively managed during this activity must be containerized or stockpiled on plastic sheeting and covered to prevent contact with precipitation.

1. Recyclable and reusable materials
 - a. The DEC Project Manager will be notified no less than 5 days prior to any offsite shipment of recyclable or reusable materials. These include, but are not limited to:
 - i. Following the initial auction, interest was raised in some of the equipment and materials on the site:
 - ii. Materials suitable for offsite reuse or recycling.
 1. Scrap metal from old rail cars.
 2. Gondola cars that have no process residuals.
 3. New metal equipment, components and materials.
 4. Unused plastic materials.
 5. Tires and wheels.
 6. Unused electrical equipment; and
 7. Contents in original drums and containers with the original labels.

Schedule

The proposed schedule is shown on the attached Figure 4.

Notifications and Reporting

The DEC will be notified no less than 5 days before the following activities under this ISMP:

1. Shipping material offsite for energy recovery;
2. Shipping material offsite for disposal; and
3. Shipping material offsite for reuse or recycling.

Inventum will submit a letter report or additional Work Scope(s) to the NYSDEC prior to shipping any material or equipment offsite for reuse or recycling. The letter report or Work Scope will include the characterization of the material or equipment, the intended disposal, reuse or recycling process and the testing that was conducted to confirm the material or equipment is suitable for its intended use.



Figures



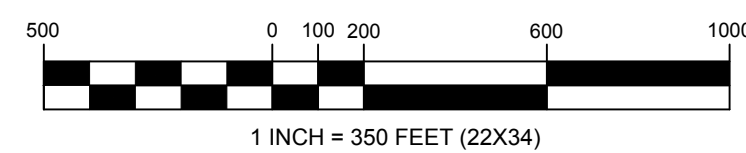


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64.08-1-10 Section No., Block No., Lot No. (SBL)

Brownfield Area

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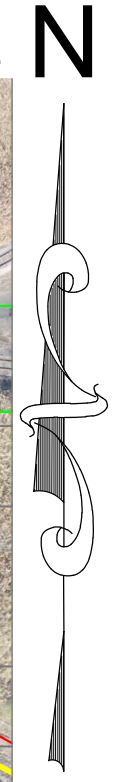
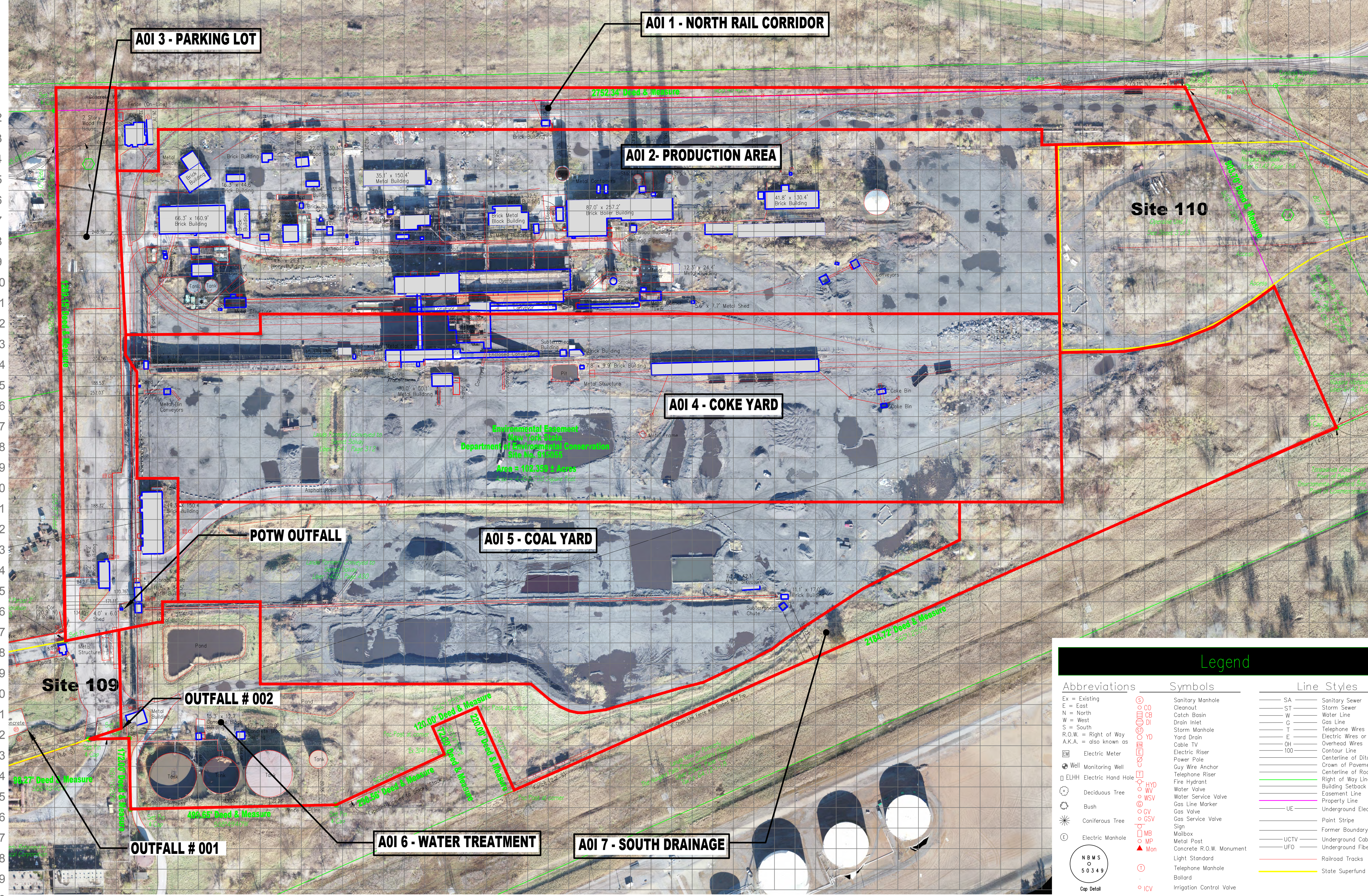
SITE LOCATION MAP
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FIGURE 1

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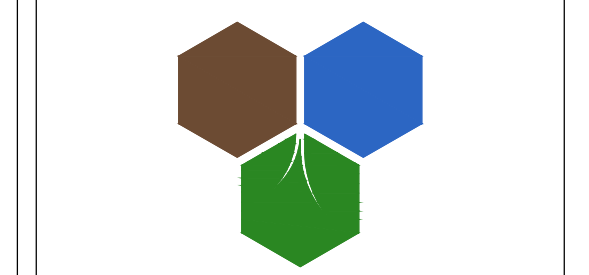
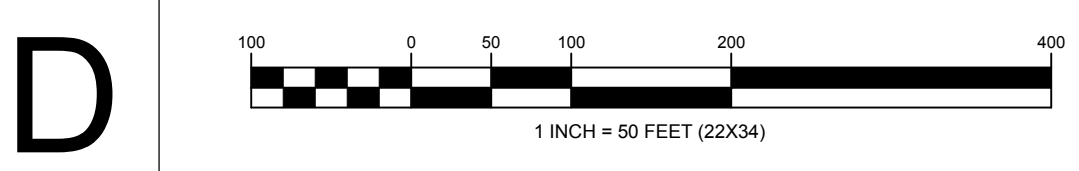
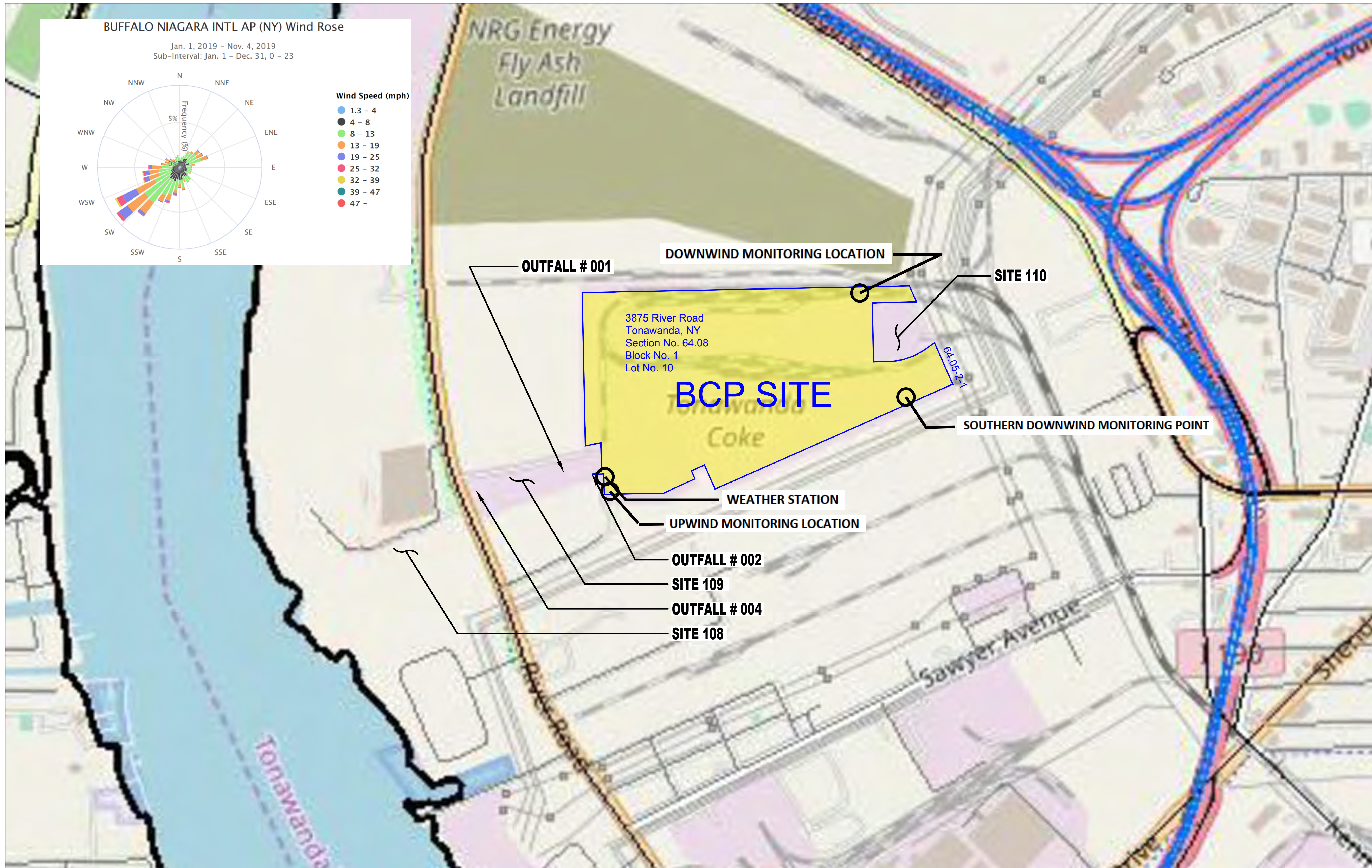
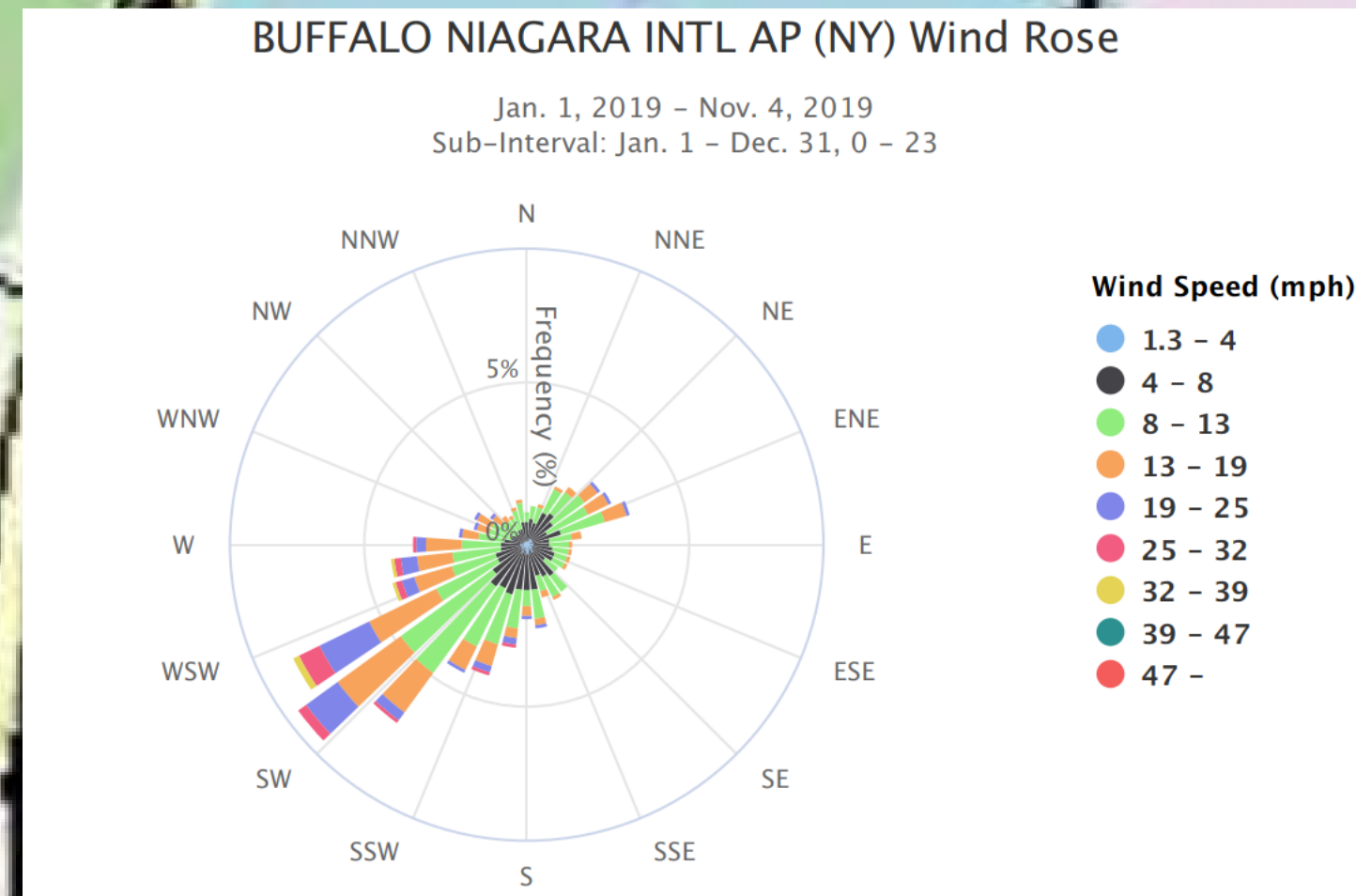


FIGURE 4
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Legend		
Abbreviations	Symbols	Line Styles
Ex = Existing	Sanitary Manhole	SA Sanitary Sewer
E = East	Cleanout	ST Storm Sewer
N = North	Catch Basin	W Water Line
W = West	Drain Inlet	G Gas Line
S = South	Storm Manhole	T Telephone Wires or Cables
R.O.W. = Right of Way	Yard Drain	E Electric Wires or Cables
A.K.A. = also known as	Cable TV	OH Overhead Wires
Electric Meter	Electric Riser	100 Contour Line
Well Monitoring Well	Power Pole	Centerline of Ditch
ELHH Electric Hand Hole	Guy Wire Anchor	Crown of Pavement
Deciduous Tree	Telephone Riser	Centerline of Road
Bush	Fire Hydrant	Right of Way Line
Coniferous Tree	Water Valve	Building Setback Line
Electric Manhole	Gas Line Marker	Easement Line
Cap Detail	Gas Valve	Property Line
	Water Service Valve	Underground Electric
	Gas Service Valve	Point Stripe
	Sign	Former Boundary Parcel Line
	Mailbox	UCTV Underground Cable TV
	Water Valve	UFO Underground Fiber Optic
	Concrete R.O.W. Monument	Railroad Tracks
	Light Standard	State Superfund Site
	Telephone Manhole	
	Bollard	
	Irrigation Control Valve	



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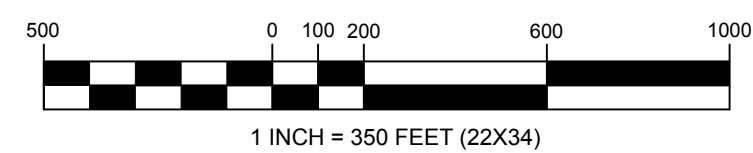


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Brownfield Area

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BASELINE AIR MONITORING STATIONS

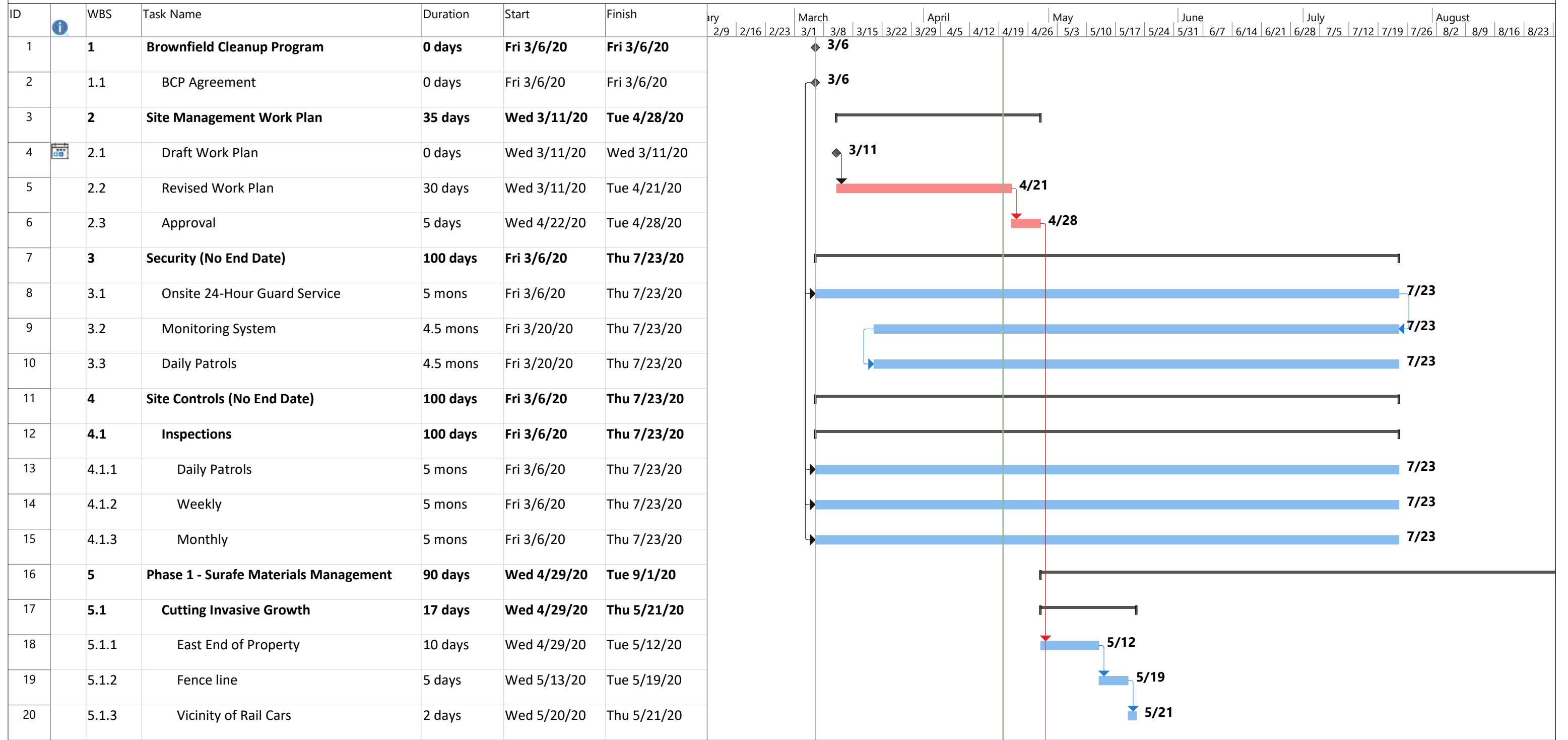
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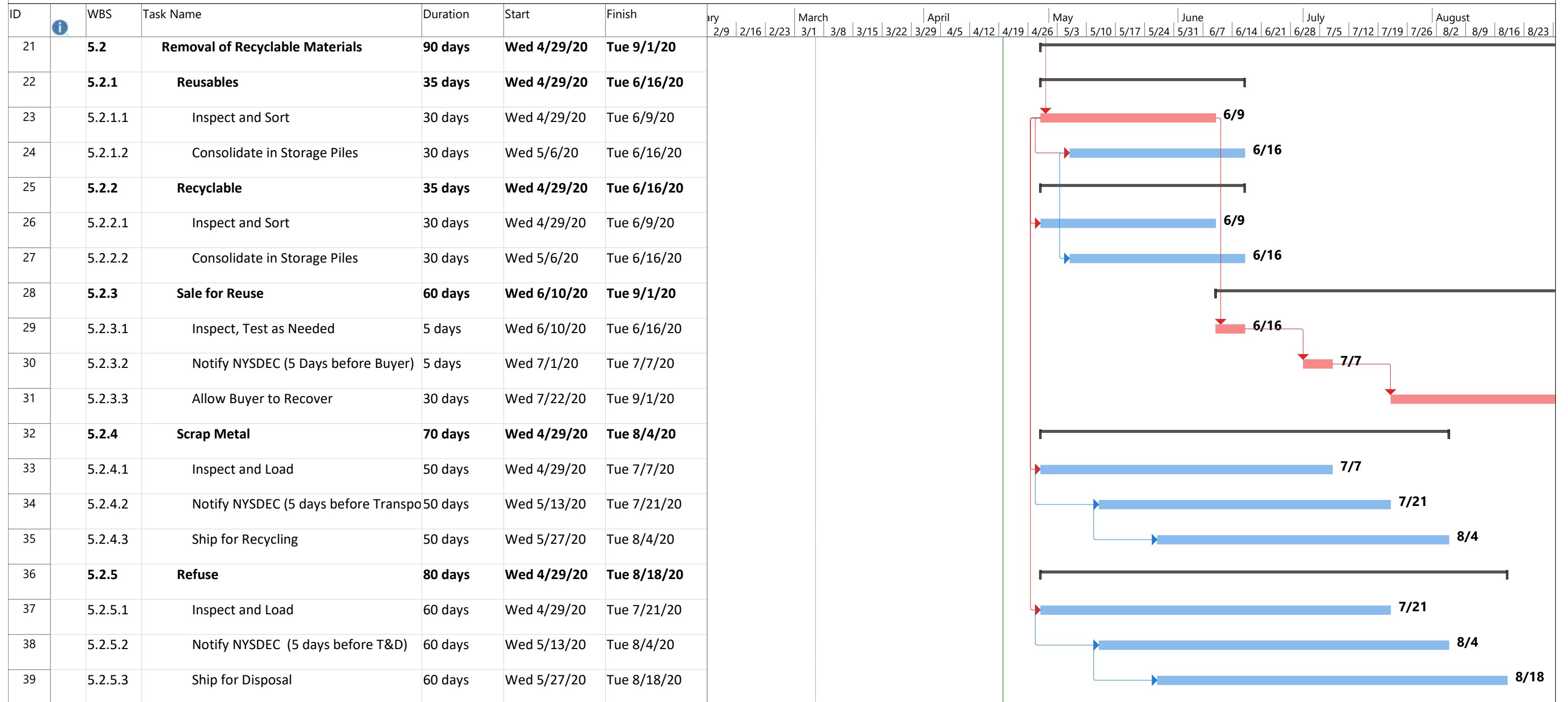
FIGURE 3
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Figure 4
Proposed Schedule
Site Management
Riverview Innovation & Technology Campus



Task		Inactive Task		Manual Summary Rollup		External Milestone		Manual Progress	
Split		Inactive Milestone		Manual Summary		Deadline			
Milestone		Inactive Summary		Start-only		Critical			
Summary		Manual Task		Finish-only		Critical Split			
Project Summary		Duration-only		External Tasks		Progress			

Figure 4
Proposed Schedule
Site Management
Riverview Innovation & Technology Campus

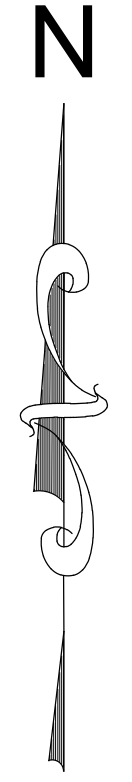


Project: Schedule Date: Mon 4/20/20	Task		Inactive Task		Manual Summary Rollup		External Milestone		Manual Progress	
	Split		Inactive Milestone		Manual Summary		Deadline			
	Milestone		Inactive Summary		Start-only		Critical			
	Summary		Manual Task		Finish-only		Critical Split			
	Project Summary		Duration-only		External Tasks		Progress			

Attachment A – Key Plan Figures



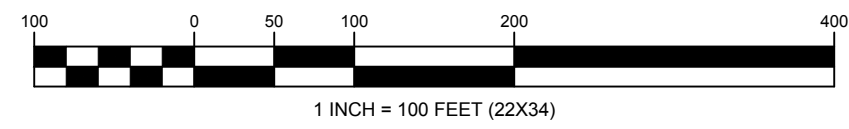
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KEY PLAN
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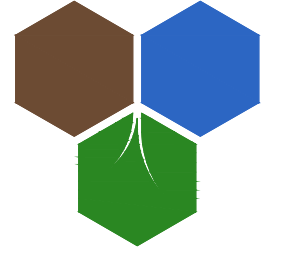


FIGURE 1

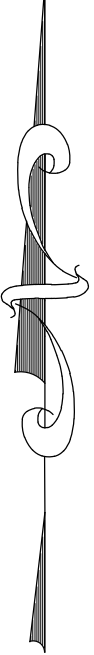
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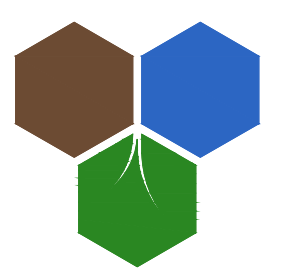
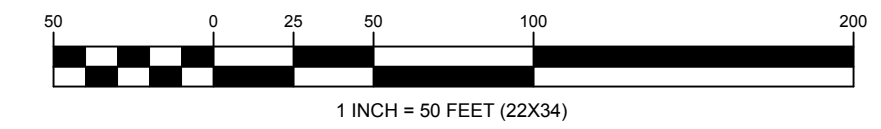


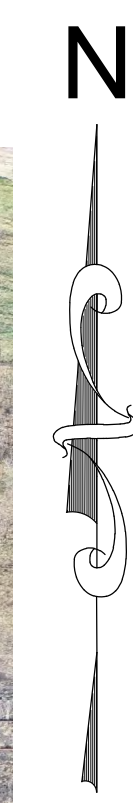
FIGURE 2

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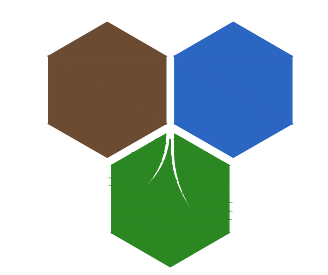
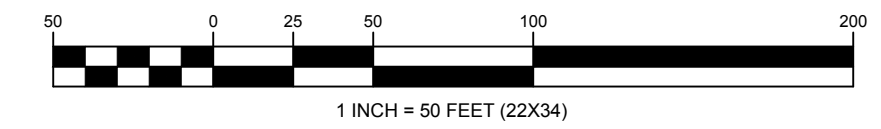


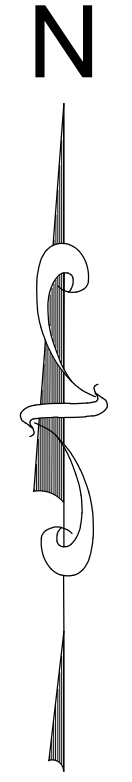
FIGURE 3

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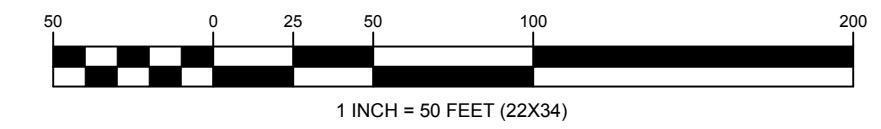
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FIGURE 4
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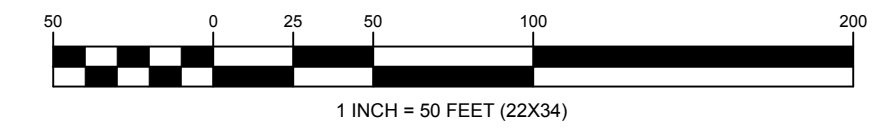
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FIGURE 5
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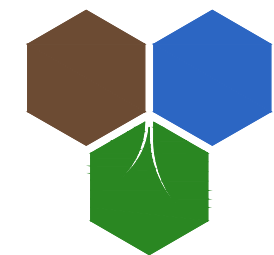
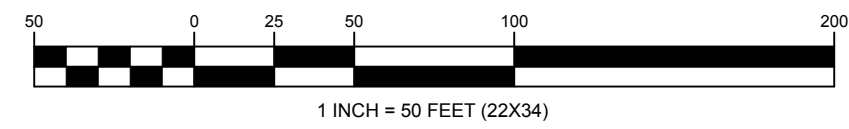
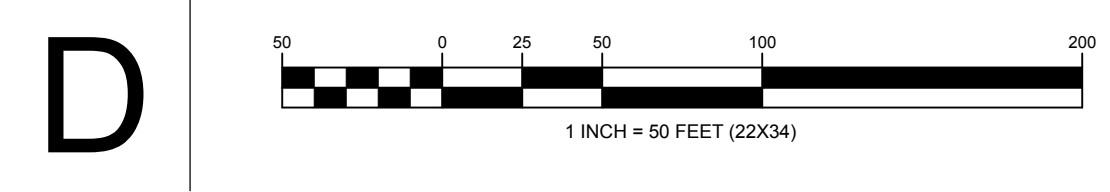
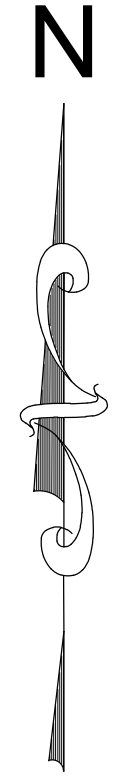
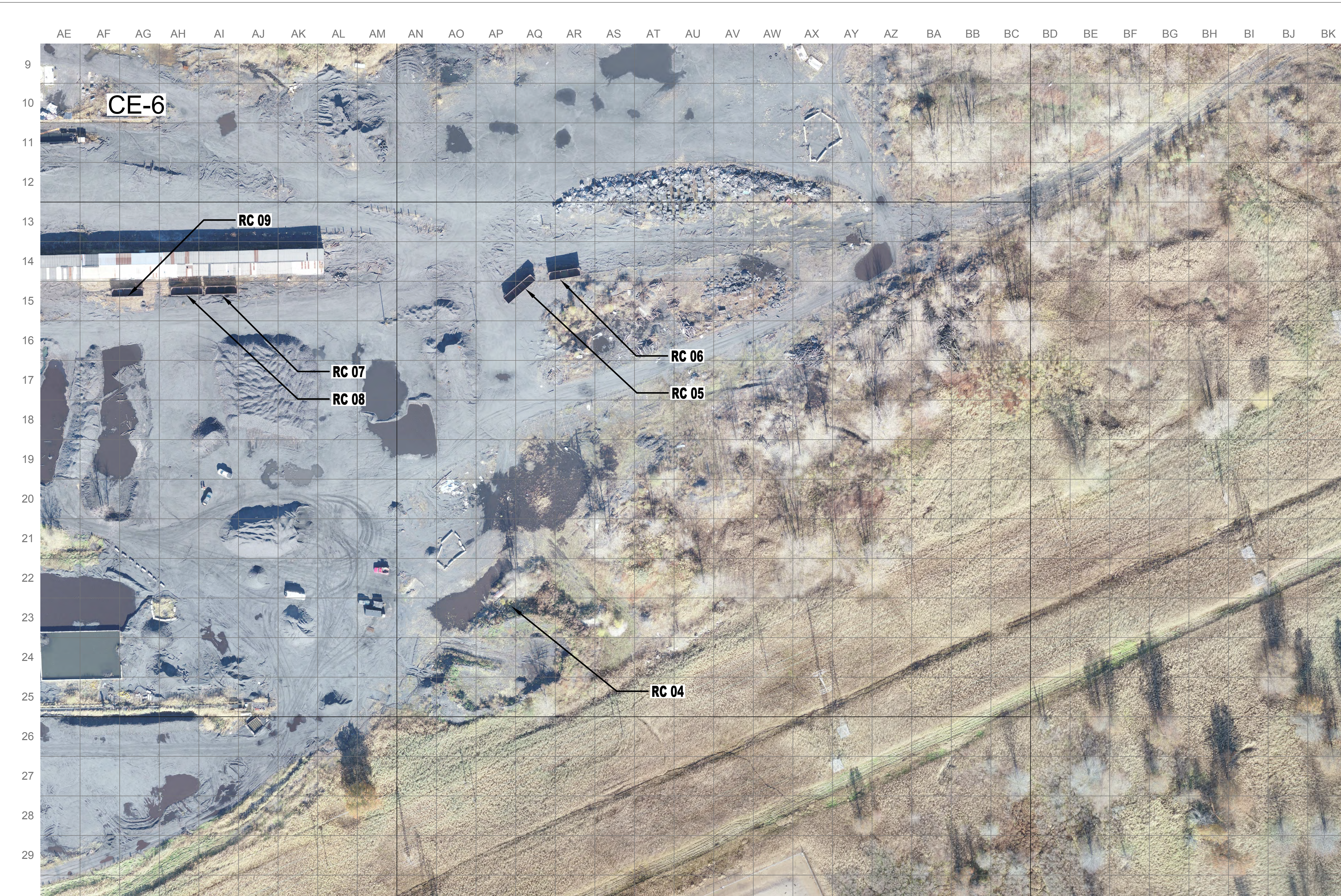


FIGURE 6
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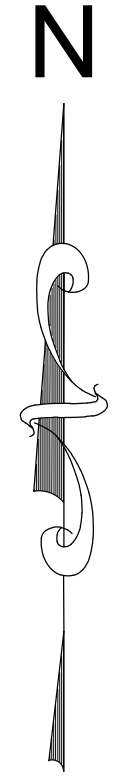
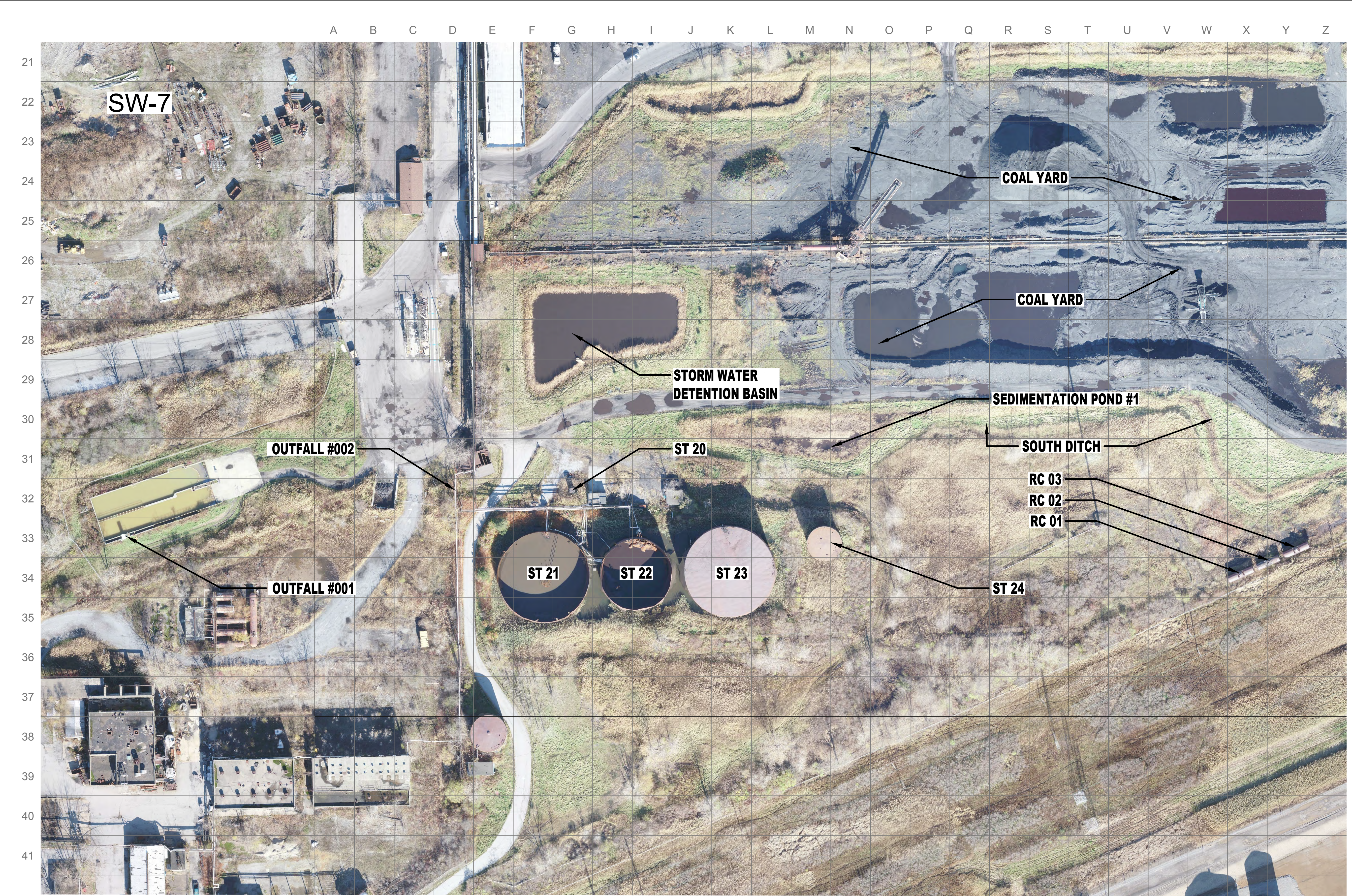
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FIGURE 7
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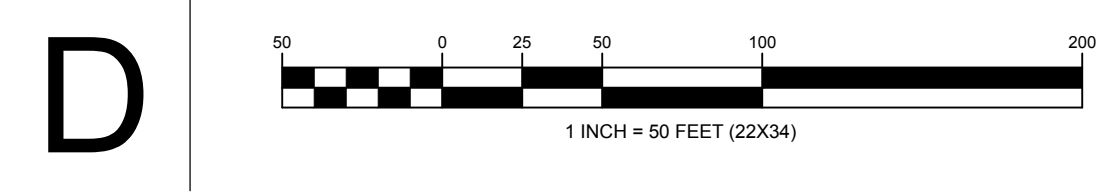
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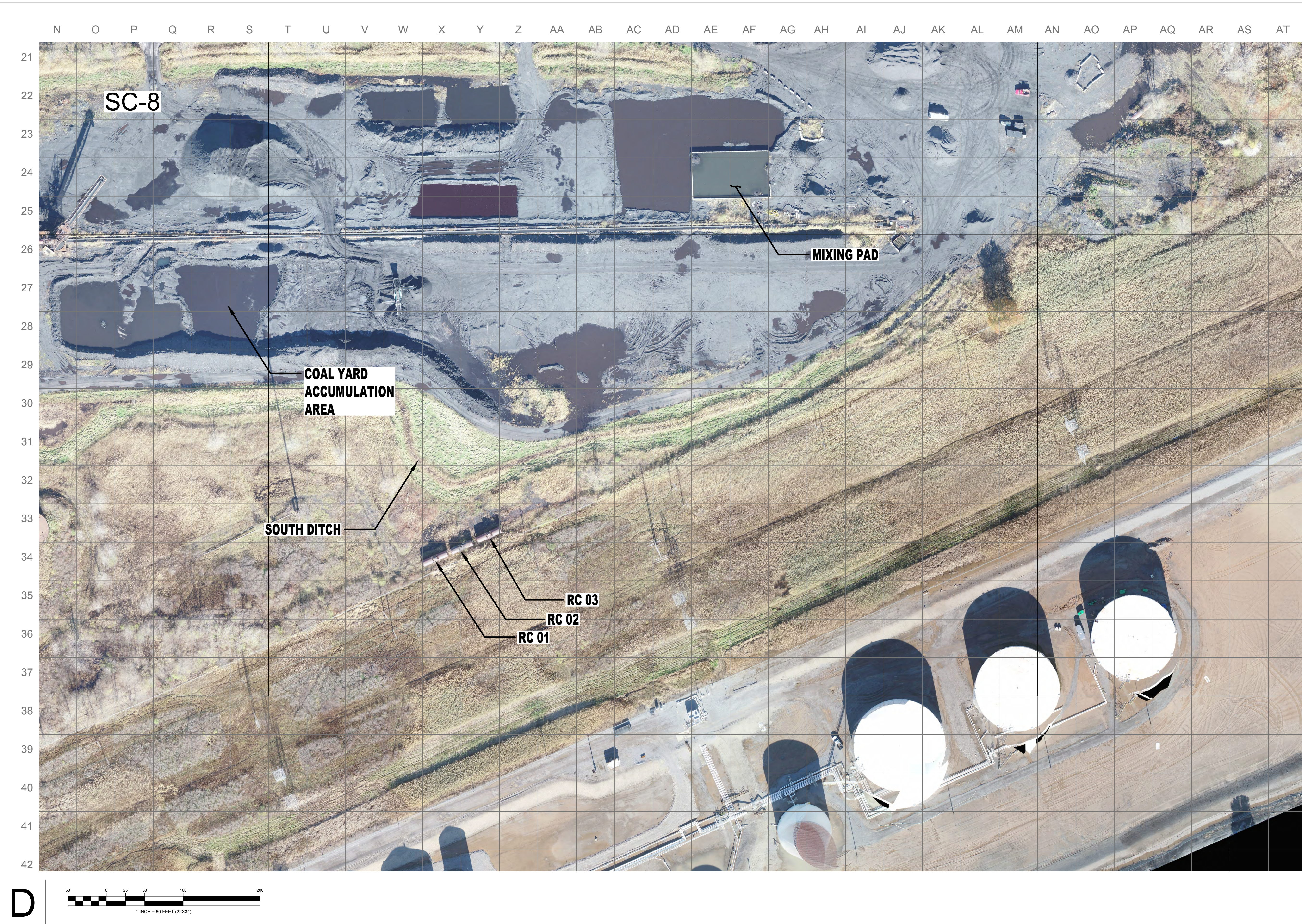
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FIGURE 8
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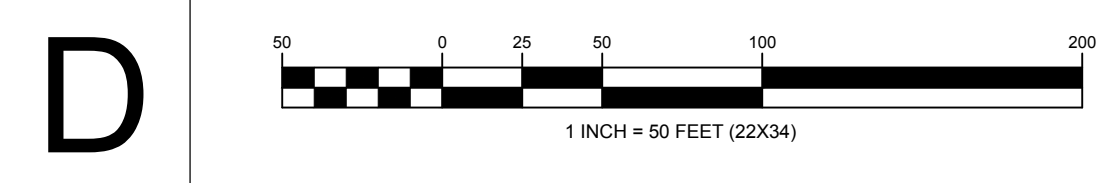


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FIGURE 9
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Attachment B – Inspection Forms



Stormwater Discharge Monitoring Log Outfall 001
 Riverview Innovation & Technology Campus, Inc.
 Town of Tonawanda, New York



Discharge to Outfall 001	Personnel	Date	Time		Meter Reading		Flow Rate	Volume	pH	Sample No.	Observations
			Start	Stop	Start	Stop	(g.p.m)	(Gallons)			
First Day of Month											
Last Day of Month											

Stormwater Discharge Monitoring Log Outfall 002
 Riverview Innovation & Technology Campus, Inc.
 Town of Tonawanda, New York



Discharge at Outfall 002	Personnel	Date	Time		Flow Depth		Flow Rate	Volume	pH	Sample No.	Observations
			Start	Stop	Start	Stop	(g.p.m)	(Gallons)			
First Day of Month											
Last Day of Month											

Stormwater Discharge Monitoring Log Outfall 004
 Riverview Innovation & Technology Campus, Inc.
 Town of Tonawanda, New York



Discharge at Outfall 004	Personnel	Date	Time		Meter Reading		Flow Rate	Volume	pH	Sample No.	Observations
			Start	Stop	Start	Stop	(g.p.m)	(Gallons)			
First Day of Month											
Last Day of Month											

Tank Inspection Log
 Riverview Innovation & Technology Campus, Inc.
 Town of Tonawanda, New York



Tank or Container No.	Description	Personnel	Date	Liquid In Secondary Containment (Y/N)	Observations	Actions Required
					<i>Include freeboard in Sec. Cont. Sheen, leaks, cover condition</i>	
Rail Cars						
RC01	Along Southern Property Line, East of Wastewater Treatment					
RC02	Along Southern Property Line, East of Wastewater Treatment					
RC03	Along Southern Property Line, East of Wastewater Treatment					
RC04	Along Southern Border, south of east end of Thawing Shed, Partially buried					
RC 10	By Gas Ball					
RC 16	North Site Boundary, North of Warehouse					

Tank Inspection Log
 Riverview Innovation & Technology Campus, Inc.
 Town of Tonawanda, New York



Tank or Container No.	Description	Personnel	Date	Liquid In Secondary Containment (Y/N)	Observations	Actions Required
					<i>Include freeboard in Sec. Cont. Sheen, leaks, cover condition</i>	
ST01	Southern Side of Light Oil Production					
ST02	Southern Side of Light Oil Production					
ST03	Southeast of Light Oil Building					
ST04	Southeast of Light Oil Building					
ST05	Southeast of Light Oil Building					
ST06	Near Coal Bin and Charging Building					
ST07	Near Coal Breaking Building					
ST08	South of Boiler House					
ST09	North of Boiler House next to Stacks					
ST10	North of Boiler House immediately north of Stacks					
ST11	North Property Line, North of Fire Water Tank					

Tank Inspection Log
 Riverview Innovation & Technology Campus, Inc.
 Town of Tonawanda, New York



Tank or Container No.	Description	Personnel	Date	Liquid In Secondary Containment (Y/N)	Observations	Actions Required
					<i>Include freeboard in Sec. Cont. Sheen, leaks, cover condition</i>	
ST12	Oil House					
ST13	Oil House					
ST14	Oil House					
ST15	Oil House					
ST16	Oil House					
ST17	Oil House					
ST18	Oil House					
ST19	Oil House					
ST20	Water Treatment, Southwest Corner of Site					
ST21	Water Treatment, Southwest Corner of Site					
ST22	Water Treatment, Southwest Corner of Site					
ST23	Water Treatment, Southwest Corner of Site					
ST24	Water Treatment, Southwest Corner of Site					
ST25	East end of Tar Handling Area					
ST26	North of Exhauster Building					
ST27	North of Tar Handling					

Tank Inspection Log
 Riverview Innovation & Technology Campus, Inc.
 Town of Tonawanda, New York



Tank or Container No.	Description	Personnel	Date	Liquid In Secondary Containment (Y/N)	Observations	Actions Required
					<i>Include freeboard in Sec. Cont. Sheen, leaks, cover condition</i>	
PT01	Newer Tank, Southwest of Electrical Department					
PT02	Center of Light Oil Production Area					
PT03	Center of Light Oil Production Area					
PT04	Southwest of Offices and Breakroom, Northeast corner of Light Oil Production					
PT09	Immediately South of PT04					
PT10	Immediately South of Light Oil Decanter					
PT05	Tar Handling Area					
PT06	Tar Handling Area					
PT07	Tar Handling Area					
PT08	Tar Handling Area					
PT11	Tar Handling Area					

Attachment C – Work Scope No. 1



Table 1
Classes of Materials
Riverview Innovation Technology Campus, Inc.
Tonawanda, New York

Material	Description	Management Protocol
Coke		Move to Coke Staging Pile for Screening by Powers, place in coke yard east of Sedimentation Pool #3.
Coke with Debris		If predominately coke, or if debris can be removed, move to Coke Staging Area for Screening by Powers, place in Coke Yard east of Sedimentation Pool #3.
Usable Railroad Ties		Move to staging area for use during demolition, within area 7.
Damaged Railroad Ties		Consolidate and stockpile along area number 7.
Drums	Sort by Materials Type	If empty move to appropriate material type below. If liquid or solids, move to container storage areas and add to inventory.
Small containers, aerosol cans, paint cans etc.		Move to shelving in Lean-to (Building 5)
Reusable Palets		Consolidate in pile of reusable palets near boiler house.
Broken Palets		Consolidate for C&D Disposal or Energy Recovery. Notify DEC no less than 5 days before loading any shipment of C&D material for offsite disposal at a licensed permitted landfill.
Metal Scrap	Railroad Plates and Spikes Rail Empty Metal Drums Empty Metal Tanks Empty Metal Pipe Metal Parts and supplies, not connected to equipment that was used. Metal rail car components, not attached to rail cars Metal feed stock for machine and welding shops.	Sort and place in metal staging areas by type near 4, 5, and 15. No metal with coatings of Tar or other process related materials to go to staging areas for scrap.

Table 1
Classes of Materials
Riverview Innovation Technology Campus, Inc.
Tonawanda, New York

Material	Description	Management Protocol
Tires and Tires Mounted on Wheels		Move to Tire staging area near 9, for future sorting of tires from wheels.
Plastic Pipe - Never Used		Place in pipe storage area near boiler house for future reuse on the property. Sell as is where is to dealer capable of cleaning and removing from site and properly managing materials offsite. Notify DEC no less than 5 days before buyer proposed to remove from property.
Locomotives (RC28 and RC18)	Verify no ACM.	Cut for scrap, materials to metal storage areas. Notify DEC no less than 5 days before the car is opened to verify there are no contents.
Rail Car RC 17	Verify Empty	
Golf Carts, Lawnmower, parts of scrap vehicles.		Prepare for disposal in a licensed permitted landfill. Provide no less than 5 days notice to DEC before any shipment from the site.
Conveyor Belting	Usable widths and lengths	Move to Conveyor Belt Staging Area near 19.
	Unusable widths and lengths	Prepare for disposal in a licensed permitted landfill. Provide no less than 5 days notice to DEC before any shipment from the site.
Plastic Waste	Empty Plastic Containers Broken Plastic Materials Siding and Roofing on the ground (Free of ACM) Miscellaneous Plastic Junk	Place in dumpster for shipment to landfill. Provide no less than 5 days notice to DEC before any shipment from the site.
Trash, not defined above		Place in pile or dumpster for shipment to landfill. Provide no less than 5 days notice to DEC before any shipment from the site.
Reusable/recyclable material identified by Ford City Equipment	e.g.- Heat Exchanger	Sell as is where is to dealer capable of cleaning and removing from site and properly managing materials offsite. Notify DEC no less than 5 days before buyer proposed to remove from property.

Table 2
Site Management
Work Scope 1
Northwest Section of Property
Riverview Innovation technology Campus, In.
Tonawanda, New York

Map Designation	Cell Range	Description	Action
1	E4 to F4	Coke and pavement on ground surface	Stockpile for screening by Powers Coal and Coke
2	F3 to I2	Former rail track disrupted by rail removal.	Consolidate ties, usable and unusable, pick plates and spikes as accessible stage for recycling, grade and compact area for trafficability.
3	H3 to H3	Trash Pile	Sort pile, remove recyclable steel, separate and stockpile tires and wheels, sort empty containers by material type, and move containers with liquids to staging area.
4	J2 to J3	Trash Pile	Sort pile, remove recyclable steel, separate and stockpile tires and wheels, sort empty containers by material type, and move containers with liquids to staging area.
5	E6 to I7	Machine Shop and Parts Storage (Building No. 8)	Scrap sorted and building organized to allow efficient/effective use. Metal and machinery moved to staging area in or near 5.
6	I8 to J8	Inoperable golf carts and rail car parts	Golf carts to pie or dumpster for landfill, Metal to staging area near 5.
7	J1 to V2	Former rail track disrupted by rail removal.	Consolidate ties, usable and unusable, pick plates and spikes as accessible, grade and compact area for trafficability.
8	K3 to K3	Locomotive (RC28)	Sell for recycling
9	K3 to K4	Tire Pile	Move tires and wheels to staging area near 9.
10	K3 to L3	Coke Pile	Move to coke yard staging area
11	K4 to L4	Trash Pile on former tank foundation	Sort pile, remove recyclable steel, separate and stockpile tires and wheels, sort pallets. Usable palets to pile near boiler house, daamaged palets to C&D pile for disposal.
12	L3 to L3	Locomotive (RC18)	Sell for recycling.
13	M2 to M3	Tank Car (RC17)	Inspect, cut for scrap if empty
14	M3 to M3	Plastic pipe that was not previously used	Reuse onsite, move to pipe staging area, near warehouse.
15	N2 to N2	Scrap Metal	Move to metal staging area near 15.

Table 2
Site Management
Work Scope 1
Northwest Section of Property
Riverview Innovation technology Campus, In.
Tonawanda, New York

Map Designation	Cell Range	Description	Action
16	P2 to P3	Mixed Debris Pile	Sort to remove railroad ties, move metal to staging area, remainder to landfill
17	Q2 to Q3	Drum Storage/Staging Area	Inventory Drums, Inspect Weekly Sort pile, remove recyclable steel, separate and stockpile tires and wheels, sort empty containers by material type, and move containers with liquids to staging area.
18	R2 to R3	Trash Pile	Sort conveyor belts for use during demoltion, rest to landfill.
19	T3 to U3	Trash Pile	Tanks, inspect, cut for scrap if empty, stabilize and protect from weather if not RCRA empty.
20	T4 to U5	Metal Tanks	Inspect, cut for disposal if empty.
21	V2 to V3	Fiberglass siding and plastic tanks	Move to container staging if have contents. Sort pile, remove recyclable steel, separate and stockpile tires and wheels, sort empty containers by material type, and move containers with liquids to staging area.
22	V4 to X5	Trash Pile	Pump water to weir tank, inspect contents, dispose as appropriate based on contents.
23	W5 to W5	Lined rolloff	Remove palets from area around the boiler house, sort and place in staging area.
24	Y6 to Y7	Palets and wood scrap.	Sell for recycling
25	Y7 to Y7	Heat exchanger	

Table 2
Site Management
Work Scope 1
Northwest Section of Property
Riverview Innovation technology Campus, In.
Tonawanda, New York

Map Designation	Cell Range	Description	Action
Materials to Remain in Place			
		Subsurface Soils	No excavation, grading of top surface to 6-inches acceptable but soils to remain in same area.
		Process Equipment and piping in Original Position	Leave for future work plan
		Soil Piles that are or have been covered with Polyethylene or other sheeting	To be characterized in RI
		Significant or flowing tar and associated soils	Note: small isolated blebs of hard tar to be placed in drums prior to grading.

A B C D E F G H I J K L M N O P Q R S T U V W X Y Z

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NW-1



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WORK SCOPE NO. 1
SITE MANAGEMENT WORK PLAN
NORTH WEST SECTION OF PROPERTY
TANKS AND RAIL CARS

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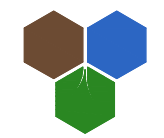


FIGURE WS - 1

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