Message

From: Sacks, Victoria [Sacks.Victoria@epa.gov]
Sent: 10/15/2020 8:03:38 PM
To: Gravelding, Mark [Mark.Gravelding@arcadis.com]
CC: Putnam, Lauren [Lauren.Putnam@arcadis.com]; Singerman, Joel [Singerman.Joel@epa.gov]
Subject: RE: Lower Ley Creek - revised PDI Report - removal near LLCD13

I do not have time to review this before the end of the day.

Please continue to include SOIL-A in the report. If you would like to add some text explain that this area is under consideration for reduction, that is fine. We will further define the limits of excavation in the RD.

Thanks,
Victoria

Victoria Paris Sacks
Remedial Project Manager
United States Environmental Protection Agency
290 Broadway 19th Floor, New York, NY 10007
sacks.victoria@epa.gov
(212) 637-4297

From: Gravelding, Mark <Mark.Gravelding@arcadis.com>
Sent: Wednesday, October 14, 2020 4:32 PM
To: Sacks, Victoria <Sacks.Victoria@epa.gov>
Cc: Putnam, Lauren <Lauren.Putnam@arcadis.com>
Subject: RE: Lower Ley Creek - revised PDI Report - removal near LLCD13

Victoria,

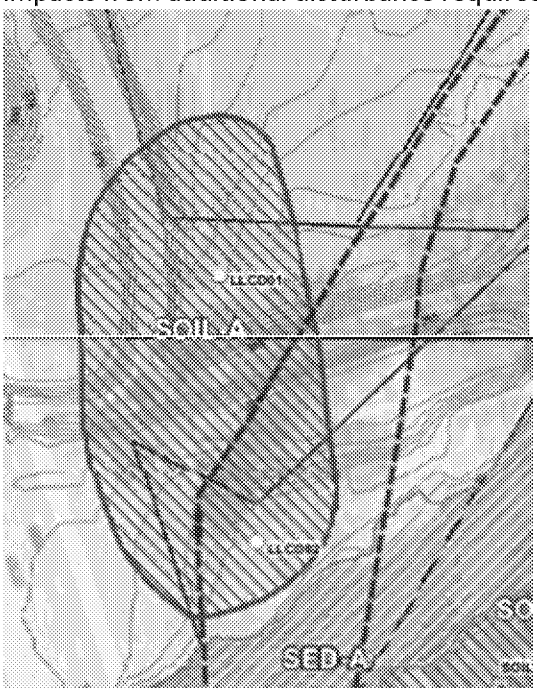
Thank you for you timely response. We will include the requested information and attachments in the revised PDI Data Summary Report.

We apologize for not bringing this up at the same time, but this morning one of the Respondents brought up that SOIL-A may be a similar situation:

- Within / adjacent to the City of Syracuse landfill;
- <1 mg/kg PCB results;
- The historical metals results are generally below the screening criteria, with the exception of arsenic, copper, lead, mercury, and zinc, which are not substantially above the screening criteria:

EXISTING SOIL SAMPLE DATA FOR AREA SOIL-A											
Location	Top (in)	Bottom (in)	Arsenic (mg/kg)	Cadmium (mg/kg)	Chromium (mg/kg)	Copper (mg/kg)	Lead (mg/kg)	Mercury (mg/kg)	Nickel (mg/kg)	Silver (mg/kg)	Zinc (mg/kg)
LLCD01	0	12	2.79	0	25.6	21.7	71.2	0.109	25.7	0	82.5
LLCD01	12	24	6.76	0.64	25.6	104	463	0.348	24.9	0	207
LLCD02	0	12	9.23	1.4	26.7	61.7	575	0.391	22.3	0	415
LLCD02	12	24	17.4	0	13.7	68.9	190	0.215	20	0	93.8
ea	ID	Top (in)	Bottom (in)	Arsenic (mg/kg)	Cadmium (mg/kg)	Chromium (mg/kg)	Copper (mg/kg)	Lead (mg/kg)	Mercury (mg/kg)	Nickel (mg/kg)	Silver (mg/kg)	Zinc (mg/kg)
Screening Criteria		0	24	13	4	41	50	63	0.18	30	2	109
Screening Criteria		24	+	16	9.3	1,500	270	1,000	2.8	310	1,500	10,000

- Boring Logs from samples collected at LLCD01 and 02 specify presence of anthropogenic material indicative of landfill waste not dredge spoils and as such should not be considered as part of the Lower Ley Creek Subsite; and
- The location of SOIL-A is fairly isolated and separated from the remainder of the removal areas, and the negative impacts from additional disturbance required to remediate outweighs the benefit of removing the soil.



Sorry for the last minute request but if you agree, we would like to include the above proposal in the revised report to be submitted tomorrow; however, if you disagree let us know if you would like to discuss ahead of the Thursday deadline or if we should not include it.

Thanks for your consideration,
Mark

Mark O. Gravelding | Senior Vice President | mark.gravelding@arcadis.com

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From: Sacks, Victoria <Sacks.Victoria@epa.gov>
Sent: Wednesday, October 14, 2020 12:37 PM
To: Gravelding, Mark <Mark.Gravelding@arcadis.com>
Cc: Putnam, Lauren <Lauren.Putnam@arcadis.com>; Singerman, Joel <Singerman.Joel@epa.gov>; Luo, Jacky X (DEC <Jacky.Luo@dec.ny.gov>; Sacks, Victoria <Sacks.Victoria@epa.gov>
Subject: RE: Lower Ley Creek - revised PDI Report - removal near LLCD13

Hi Mark,

Thank you for the updated information regarding the area surrounding LLCD13. EPA and DEC concur that this area may be reduced in the PDI Data Summary Report. Please justify the logic for reducing the area in the body of the report and

include information showing the boundaries of the former City of Syracuse landfill (in relation to those 4 borings of interest), boring logs showing anthropogenic material in the area, and field notes of the collected samples SOIL-C-038 through -042.

Let me know if you have any additional questions,

Victoria

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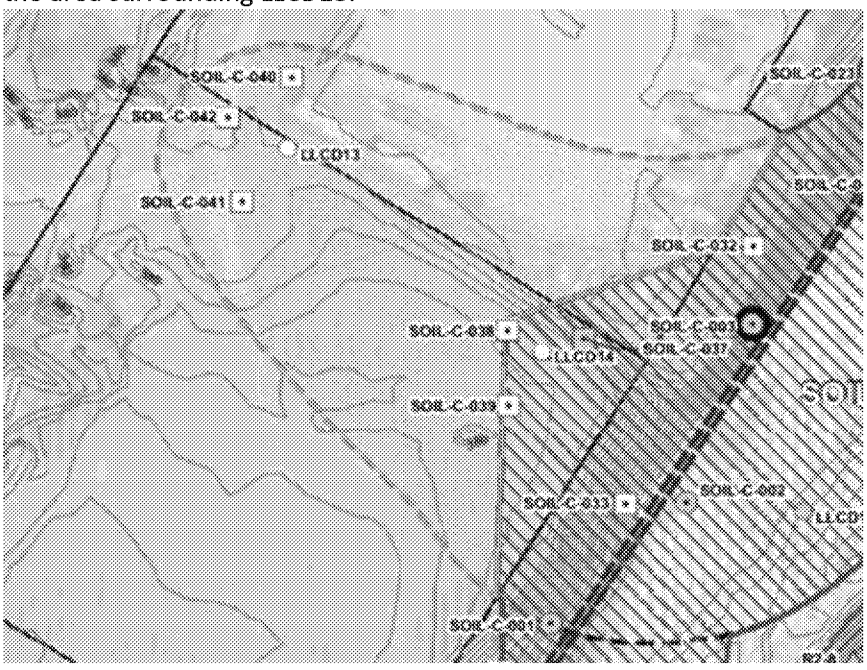
From: Gravelding, Mark <Mark.Gravelding@arcadis.com>
Sent: Tuesday, October 13, 2020 2:42 PM
To: Sacks, Victoria <Sacks.Victoria@epa.gov>
Cc: Putnam, Lauren <Lauren.Putnam@arcadis.com>
Subject: FW: Lower Ley Creek - revised PDI Report - removal near LLCD13

Victoria,

Some boring logs recently became available to one of our clients (as part of a separate investigation) that highlight the overlap of some of the Lower Ley Creek Subsite removal area with the former City of Syracuse landfill area, specifically in the area surrounding LLCD13.



This is an area we proposed in the May 2020 PDI Summary Report be removed from the remedy, but on our conference call a couple weeks ago that we agreed to highlight this "airplane tail" area to *potentially* be removed from the remedy based on the results of future metals sampling. In light of additional information and discussions with the Respondents, we again propose the area around LLCD13 in SOIL-C as a removal extent reduction area, and without the need for future sampling, based on the following conclusions:

- The area is solidly within the former City of Syracuse landfill area, and there were previous discussions with EPA that although the Respondents would need to address PCBs found in dredge spoils/flood residue that had been deposited on top of landfilled waste they would not have to chase after PCBs (or other constituents) contained in landfilled waste;
- The PCBs results from PDI sampling are less than 1 ppm;
- PDI soil sampling results provide supporting information that this area is not part of a former dredge spoil area – specifically samples Soil-C-039, Soil-C-038, and Soil-C-032 are less than 1 for PCBs and support the belief that the "airplane tail" is not part of the Soil C dredge spoil deposit and the boundary as presented in the ROD should not have been extended to encompass LLCD13 .
- The historical metals results are generally below the screening criteria, with the exception of copper, lead, mercury, nickel, and zinc, which are not substantially above the screening criteria (see Attachment 3 of Respondents' August 27, 2020 comment response);
- Field notes from samples collected at SOIL-C-037 through -042 specify presence of anthropogenic material such as asphalt, concrete, plastic, brick, glass generally indicative of landfill waste and as such should not be considered as part of the Lower Ley Creek SIte;
- The location of LLCD13 is fairly isolated and separated from the remainder of the removal areas, and the negative impacts from additional disturbance required to remediate outweighs the benefit of removing the soil.

If you agree, we would like to include the above proposal in the revised report to be submitted this Thursday; however, if you disagree let us know if you would like to discuss ahead of the Thursday deadline or keep things the way we discussed on our call.

Thanks for your consideration,
Mark

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