

**SITE OPERATING PLAN (SOP)
DRUM REMOVAL ACTION**

**PAS IRWIN DUMP SUPERFUND SITE
OSWEGO, NEW YORK**

SEPTEMBER 2008

REF. NO. 630609 (1)

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1.0 INTRODUCTION

This Site Operating Plan (SOP) was prepared pursuant to paragraph 45 of the Administrative Settlement Agreement and Order on Consent for a Removal Action (Index No. CERCLA-02-2008-2018) (Order) for the Pollution Abatement Services (PAS) Irwin Dump Superfund Site (Site). In addition to the introduction and site history, this SOP also includes the Site Work Plan, Health and Safety Plan, Transportation and Disposal Plan, and Quality Assurance Project Plan. The Site consists of a drum burial area (Drum Area) located in part of a construction and demolition debris landfill (C & D Landfill) created in the 1970s and situated near the southwest limits of the City of Oswego, New York as presented on Figure 1.1. The Site is bounded to the east and west by commercial businesses, to the south by Byer Road and immediately to the north by woodlands. A Site plan is presented on Figure 1.2.

As described in paragraph 44 of the Order, the purpose of this SOP is to provide a plan to address the following: proper characterization, transportation and off-Site disposal of drums and containers already excavated and staged at the Site; proper characterization, transportation and disposal of contaminated soil already staged at the Site; determination of the extent of soil contamination associated with the Drum Area; excavation of any other buried drums and/or other containers in the Drum Area; excavation of contaminated soil in the Drum Area; proper characterization, transportation and off-Site disposal of additional excavated drums and soil associated with the Drum Area; appropriate post-excavation soil sampling and analysis in the excavation area to document the adequacy of the soil removal; further investigation to determine the potential extent of groundwater contamination associated with the Drum Area; appropriate backfilling of the excavation and Site restoration.

1.1 SITE HISTORY

The Site is part of a 4-acre construction debris landfill created in the 1970s. Reportedly, approximately 200 drums from the PAS site located on E. Seneca Street in the City of Oswego were transported to and buried on the Site in the mid-1970s.

Several field investigations have been undertaken at the Site beginning in 1983. A Phase I investigation (1983) and a Phase II investigation (1986) were completed at the Site by New York State Department of Environmental Conservation (NYSDEC) and reported no significant contamination. Buried drums were discovered on the Site during an expanded NYSDEC Phase II investigation in 1991. Waste from one of the drums failed Extraction Procedure Toxicity Test (EP-TOX) for ignitability. At least

six drums were uncovered and all were reportedly in poor condition. Samples from groundwater wells installed around the landfill did not indicate significant levels of contamination. Due to the presence of an unknown number of drums buried on the Site, the NYSDEC listed the Site on its Class 2 Registry of Inactive Hazardous Waste Disposal Sites on March 31, 1994.

In 1998, in response to a referral from NYSDEC, U.S. Environmental Protection Agency (USEPA's) Region II removal program performed a removal assessment at the Site. USEPA excavated 15 trenches and collected five soil samples during the assessment. Groundwater samples were also collected and analyzed from six monitoring wells around the Site. No cache of buried drums was located on the Site during the 1998 assessment and the results of the samples did not indicate any significant contamination.

NYSDEC returned to the Site in 1999 to confirm the presence of the drum burial area. The excavation work at this time revealed more than 25 drums buried in the same area previously identified in 1991. At least one of these drums contained an ignitable material and was overpacked and removed from the Site.

In 2007, a Site Removal Assessment was performed by USEPA. The Site Removal Assessment identified a drum burial area located near the embankment that was approximately 40 feet by 60 feet and approximately 15 feet deep. At the completion of the Site Removal Assessment, 150 drums and 200 cubic yards of contaminated soil excavated from this area were staged on the surface of the Site. During the excavation, USEPA reportedly observed damaged and corroded buried drums. The drums contained clear liquids, colored solids, brown and black resinous material, viscous tarry liquids, clear silicone-like gels and rubbery textured brown/orange solids. Of the 24 samples, four samples were collected from the stockpile and the 20 remaining samples were collected from the drums or directly from the trackhoe bucket. Samples were analyzed for an extensive parameter list including Resource Conservation and Recovery Act (RCRA) characteristics, Toxicity Characteristic Leaching Procedure (TCLP) Volatile Organic Carbons (VOCs), TCLP Semi-Volatile Organic Carbons (SVOCs), TCLP metals, TCLP pesticides, Polychlorinated Biphenyls (PCBs), pesticides, Target Analyte List (TAL) metals, cyanide, Target Compound List (TCL) VOCs, and TCL SVOCs. Results from the analysis of these samples concluded that hazardous substances as defined by CERCLA remained at the Site. An unknown number of drums remain in the drum burial area along contaminated soil impacted by releases from these drums.

1.2 SOP ORGANIZATION

The SOP includes the following plans:

Appendix A Site Work Plan

Appendix B Health and Safety Plan

Appendix C Transportation and Disposal Plan

Appendix D Quality Assurance and Project Plan