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Remedial Action Work Plan

Bern Metal/Universal Sites
PRP Group

June 2001
(Revised August 2001)

BBL
ENVIRONMENTAL SERVICES, INC.

Remedial Action • Management and Construction

WORK PLAN

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ENVIRONMENTAL SERVICES, INC.
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1. Introduction

1.1 General

This Remedial Action Work Plan (Work Plan) has been prepared to be incorporated into the Consent Decree entered into between the Bern Metal/Universal Sites Cooperating Potentially Responsible Parties (CPRP) Group and State of New York. The elements of the Work Plan are identified in Section 6 – Future Submittals, in the NYSDEC-approved Final Design Report (BBL, September 1998). As appropriate, additional details to the Final Design Plan have been addressed in this Work Plan. The Final Design Report will serve as the over-riding document relative to the implementation of the Remedial Action.

1.2 Site Description

The Bern Metal/Universal sites (Site) is comprised of two separate units: the Bern Metal property and the Universal property. Due to the close proximity of these two properties, the NYSDEC identified the units under one site registry number (Site No. 915135). The Bern Metal property was primarily used to reclaim lead cores from automotive batteries and for the reprocessing/recycling of metal powders and scrap metals. The Universal property was primarily used for recycling scrap metal. The Bern Metal property is not currently in use. Operations at the Bern Metal property primarily occurred from 1938 to 1983. The Universal Metal property owner is currently using the property for storage of scrap automobiles. The entire Site covers an approximate area of 5.2 acres.

1.3 Purpose and Description

This Work Plan presents the functions and responsibilities of the CPRP Group, the remediation contractor, and the oversight engineer as they relate to completion of the remedial activities approved by the NYSDEC for the Site. The Work Plan has been organized into the following sections:

- Section 1 – Introduction;
- Section 2 – Project Organization and Responsibilities;
- Section 3 – Pre-Mobilization Activities;
- Section 4 – Remedial Action Activities;
- Section 5 – Project Reporting and Documentation; and
- Section 6 – Schedule.

2. Project Organization and Responsibilities

2.1 General

In general, the remedial action will be undertaken and completed by a qualified remediation contractor to be retained by the CPRP Group. The remedial action activities will be overseen by an oversight engineer to ensure that the work is being completed in accordance with the NYSDEC-approved remedial design and this Work Plan.

2.2 Project Organization

The project will be organized around the CPRP Group and it representatives, which will include an oversight engineer and a remediation contractor. A detailed project organization chart will be prepared by the CPRP Group once its representatives have been identified.

2.3 Project Roles and Responsibilities

CPRP Group – The role of the CPRP Group is to undertake the remedial action in accordance with the Consent Decree. The CPRP Group is responsible for meeting the obligations set forth in the Consent Decree.

Oversight Engineer – The role of the oversight engineer is to act as the CPRP Group's representative to oversee and coordinate the remedial action activities in accordance with the NYSDEC-approved remedial design and this Work Plan. The oversight engineer is responsible for meeting its obligations to the CPRP Group.

Remediation Contractor – The role of the remediation contractor is to act as the CPRP Group's representative to provide labor, materials and equipment necessary to implement the remedial action activities in accordance with the NYSDEC-approved remedial design and this Work Plan. The remediation contractor is responsible for meeting its obligations to the CPRP Group.

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3. Pre-Mobilization Activities

3.1 General

Pre-mobilization activities to be performed include the submittal of specified deliverables to the NYSDEC for approval prior to commencement of Site activities, acquiring permits and approvals, obtaining property access agreements, training of Site personnel, ordering of construction materials, and scheduling of Site personnel and construction equipment.

3.2 Approvals and Permits

The CPRP Group and/or remedial contractor will secure all necessary approvals, permits, and access agreements prior to mobilization of personnel and equipment to the Site. No approvals or permits from NYSDEC are required other than as set out herein. The CPRP Group will secure the access agreements with Site property owners and any necessary adjacent property owners. The remedial contractor will secure the necessary demolition, sewer use, and property specific permits to perform the construction activities at the Site

3.2.1 Conrail/CSX Property Access Agreement

Prior to performing any remedial activities on the Conrail/CSX property, the CPRP Group will obtain a signed agreement with Conrail/CSX allowing access to the their property. The access agreement will specify areas of Conrail/CSX to be remediated, as well as traveled during the remediation activities. Specific Conrail/CSX health and safety issues, if any, will be identified in the access agreement.

3.2.2 Laub Property Access Agreement

Prior to performing any remedial activities on the Laub International, Inc. (Laub) property, the CPRP Group will obtain a signed agreement with Laub allowing access the their property. The access agreement will specify areas of Laub to be remediated, as well as traveled during the remediation activities.

3.2.3 Universal Property Access Agreement

Prior to performing any remedial activities on the Universal property, the CPRP Group will obtain a signed agreement with Universal property owner allowing access the property. The access agreement will specify areas of Universal to be remediated, as well as traveled during the remediation activities.

3.2.4 Removal of Debris

In addition to obtaining an access agreement with the Universal site property owner, an agreement will also be executed which will require the owner to remove site accumulated debris. The debris is primarily associated with the accumulation of automobiles (cars, trucks, buses, semi-trailers, etc.) and associated automotive parts.

The accumulated debris will need to be removed prior to any remediation of this property as referenced in the Final Design Report.

3.2.5 Bern Metal Property Access Agreement

Prior to performing any remedial activities on the Bern Metal property, the CPRP Group will make arrangements for access to Bern Metal property.

3.2.6 Demolition Permit

Prior to demolition of buildings identified on the Bern Metal property, a demolition permit must be obtained from the City of Buffalo. As required by the City of Buffalo, prior to the issuance of a demolition permit, the contractor must perform the following:

- An asbestos survey to identify the potential presence of asbestos containing materials (ACM);
- Asbestos abatement, if the asbestos survey verifies the presence of ACM and, if necessary, obtaining a separate asbestos removal permit from the City of Buffalo;
- Disconnection of the water supply and the sewer service by a licensed plumber followed by an inspection by the City of Buffalo. The remaining utility companies servicing the properties will be notified to disconnect their respective services, prior to demolition; and
- Rodent control by baiting all buildings to be demolished.

Upon completion of the above-referenced activities, the demolition permit will be obtained from the City of Buffalo. Upon receipt of the demolition permit, the demolition activities will be initiated no later than one week after the buildings have been baited, as required by the City of Buffalo.

3.2.7 Sewer Discharge Permit

The remedial contractor will obtain a sewer discharge permit for the discharge of accumulated groundwater, precipitation, and/or decontamination water into the City of Buffalo sewer system. The Buffalo Sewer Authority (BSA) will be contacted to establish a new permit or re-open a permit that existed between the CPRP Group and the BSA during remedial work associated with the related Clinton/Bender site.

3.3 Health and Safety Plan

A health and safety plan (HASP) was prepared and submitted as Appendix A in the NYSDEC-approved Final Design Report. The remedial subcontractor will prepare and submit a HASP to the NYSDEC for approval that will meet the minimum requirements of the HASP presented in Appendix A in the NYSDEC-approved Final Design Report.

3.4 Monitoring Well Abandonment

Prior to implementation of the construction activities on the Bern Metal and Universal properties, all monitoring wells will be properly abandoned. The remedial contractor may choose to not abandon monitoring well MW-7, as referenced in the Final Design Report; however, should MW-7 become damaged during construction activities, this monitoring well will be abandoned and replaced. The abandonment activities will be performed in accordance with NYSDEC procedures by a licensed driller under supervision of a geologist.

3.5 Sampling of Borrow Material Source(s)

In accordance with Section 2.4.6 of the NYSDEC-approved Final Design Report, sampling of material from each identified borrow source will be performed by collecting three discrete samples from a source area for compositing. The discrete samples will be submitted to an analytical laboratory to form one composite sample for analysis of Target Compound List (TCL) volatile and semi-volatile organic compounds, Target Analyte List (TAL) metals, pesticides/polychlorinated biphenyls, and herbicides in accordance with the United States Environmental Protection Agency (USEPA) Methods 8260, 8270, 6000/7000 Series, 8080, and 8051, respectively. The analytical results will be compared to site-specific soil cleanup criteria (750 mg/kg for lead) and/or NYSDEC Technical and Administrative Guidance Memorandum (TAGM) 4046 Soil Cleanup Objectives and Cleanup Levels.

4. Remedial Action Activities

4.1 General

This section presents an overview of the engineering design associated with the Site remedy. The design was prepared to achieve requirements set forth in the ROD, including the remediation of adjoining properties by removing impacted soil and consolidating the soils on the Bern Metal property. The primary engineering design components include the following:

- Site Preparation;
- Building Demolition and Debris Management;
- Excavation/Consolidation of impacted soils and sediments onto the Bern Metal property;
- Capping of portions of the Bern Metal property;
- Stormwater Management; and
- Perimeter Fencing.

4.2 Mobilization and Site Preparation

As part of this task, the remedial contractor will mobilize field trailers to the Site, anticipated to be the former Clinton/Bender properties. The trailers will support staff of the remedial contractor, the Engineer, the NYSDEC oversight personnel, and Site security. The remedial contractor will be responsible for connecting appropriate utilities to the field trailers. The remedial contractor will also mobilize construction equipment and materials to perform the remedial action at the Site.

Site security will be initiated upon mobilization to prevent unauthorized persons from entering the restricted area throughout the duration of on-site construction activities. Site security will be provided seven days per week, 24 hours per day, including weekends and holidays. Site security will be responsible for control of all persons and vehicles entering and exiting the Site by logging entry and exit of personnel and vehicles. The Site security will be in radio contact with each other, as well as the remedial contractor and Engineer to address emergency situations, if any.

Prior to performing any Site work, Site preparation activities including clearing and grubbing of vegetation, improvement of temporary access roads on the Conrail and Laub properties, construction of erosion control and stormwater management structures, and performance of a site survey will be implemented. Improvement of temporary access roads may include re-grading, placement of crushed stone to minimize dust generation, and use of geotextile filter fabric. Erosion/stormwater control will be implemented by the placement of silt fence and hay bales. The Site survey will be performed to establish baseline Site grades.

4.3 Building Demolition

Upon receipt of a demolition permit from the City of Buffalo, the demolition of Site structures will begin. Prior to demolition of any Site structures, any asbestos-containing materials, if identified as a result of the asbestos survey, will be removed and disposed in accordance with applicable regulations and any non-structural materials will be removed for proper off-Site disposal. Utilities (water, sewer, gas, electric etc.) will be disconnected prior

to demolition activities, along with baiting for rodent control. During the demolition activities, the buildings will be sprayed with water to minimize dust generation. Steel generated from the building demolition may be sent off-Site for salvage after being cleaned using a high-pressure wash on site, and notification of the NYSDEC and intended salvage facility. The demolition debris will be graded and rolled/compacted on-Site under the supervision of the Engineer.

All appropriate documentation required by OSHA regulations and local codes related to building demolition will be developed and provided during construction. Structural steel will be visually inspected to confirm a "scrap-ready" condition.

4.4 Excavation of Impacted Soil and Sediment

Excavation within each area will be to the depth depicted on the Excavation Plan (Sheet 2, Final Design Report, BBL, September 1998), or to the top of clay layer, whichever is encountered first. Excavation activities will be performed in accordance with the HASP (Appendix A, Final Design Report, BBL, September 1998). Also, site air monitoring will be performed, as presented in the Air Monitoring Plan (Appendix B, Final Design Report, BBL, September 1998).

If the top of clay serves as the vertical limit of excavation, a minimum of six inches of clay will be removed. Based on information obtained in the RI, the underlying clay layer on the Bern and Universal properties is a gently undulating surface that generally slopes to the former Little Buffalo Creek channel, located in the Universal property. The top of clay layer is a brown lacustrine clay. As discussed in the RI, this clay layer did not appear to be impacted by former site operations and, in many areas, defines the vertical extent of contamination. Following completion of excavation within an area, the Engineer and NYSDEC representative will inspect the excavated area and verify that excavation limits have been met. Following acceptance that the required excavation has been performed, a final survey of the excavated area will be performed to document the in-place volume of material removed.

Prior to excavation activities, a field stakeout of site utilities will be performed, as well as staking to identify the limits of excavation. As determined appropriate by the Engineer, silt fencing will be installed in excavation areas that will receive runoff. In addition to silt fencing, any excavation areas that are not bounded by permanent fencing will have temporary orange fencing installed around the excavation area to limit access.

Excavation activities will be performed using smooth-bladed equipment to provide a uniform excavation surface. The excavation activities will be performed in accordance with the Site-specific HASP and the Air Monitoring Plan (AMP). Following completion of excavation within an area, the Engineer and the NYSDEC representative will inspect the excavated area and verify the excavation limits have been met. Following acceptance of the excavation limits, a final survey of the excavated area will be performed to document the in-place volume of soil removed.

4.5 Consolidation of Excavated Impacted Soil and Sediment

Excavated soils and sediments will be transported to the Bern Metal property and placed in approximate 12-inch lifts. Each lift will be compacted with a roller, using a minimum of two passes using a smooth drum roller of sufficient weight and contact pressure to effectively minimize voids and densify the materials until the surface is "unyielding", with oversight provided by the Engineer. The lifts will initially be placed along the southern portion of the Site, progressing to the north to maintain access to the Site from Bender Avenue and to maximize use of the on-site asphalt decontamination pad. Material will be placed and compacted to achieve required

grades. Final grading of the subgrade will be performed prior to construction of the cap. Equipment used for placement, compaction, and grading will be decontaminated prior to leaving the Site.

4.6 Backfilling/Restoration of Excavated Areas

Backfilling of excavated areas will be performed following completion of excavation and surveying within each area. Backfilling will be performed using material (bank run fill or equivalent) supplied by a NYSDEC-approved backfill source. Backfill will be placed in the excavation in approximate12-inch lifts and will be compacted after each lift with a roller or vibratory compactor. The top six inches of soil in the backfill areas will be of a type that can support vegetative growth. The areas will be backfilled within six inches of existing topography. Areas on the Laub property currently covered with gravel/crushed stone will be topped with a layer of No. 2 crusher run, or equivalent. Unpaved areas will be seeded with a seed-fertilizer-mulch mixture to promote vegetative growth.

4.7 Construction of Final Cover System

The final cover system has been designed to provide a barrier that will prevent direct contact with contaminated soils and that will minimize infiltration through the contaminated soils. The final cover system footprint will lie entirely within a portion of the Bern Metal property. The cover system will be constructed with 25% side slopes along the perimeter, with intermediate slopes transitioning to 10%, and the minimum top slopes to be 4%. The proposed cover system will consist of the following components:

- A 10 ounce per square yard non-woven geotextile cushioning layer;
- A 60 mil thick high density polyethylene (HDPE) geomembrane liner;
- A geosynthetic drainage composite to convey stormwater that infiltrates through the barrier protection soil of the cap;
- A 12-inch thick layer of barrier protection soil to protect the cover system from damage due to sunlight, weather conditions, or human/animal contact, and provide a base for topsoil and seeding; and
- A 6-inch layer of soil suitable for supporting vegetative growth, which will be seeded with a seed-fertilizer-mulch mixture.

4.8 Construction of Permanent Stormwater Management Controls

Permanent stormwater controls to be constructed as part of the project include the following:

- Mid-Slope Drainage Swale - Swales will be constructed along the side slopes of the proposed cover system to intercept sheet flow runoff for conveyance to the outlet drainage ditch located at the southerly end of the Bern Metal property. Erosion control matting will be installed to stabilize the swales until vegetation is established;
- Perimeter Drainage Ditch - The perimeter drainage ditch will be constructed around the perimeter of the proposed cover system to intercept runoff occurring below the mid-slope drainage swales. The flow within

this ditch will be conveyed to the outlet drainage ditch, as well to two drainage catch basins located at the northerly end of the Bern Metal property. The ditch side slopes will be lined with stone material and vegetation to provide scour protection for flow within the ditch and to allow for drainage from the cover system geosynthetic composite. The opposing ditch side slope will be vegetated with grass; and

- Outlet Drainage Ditch - The outlet drainage ditch will be constructed at the southerly end of the Bern Metal property to convey runoff collected from both the mid-slope drainage swales and the perimeter drainage ditches. Runoff within the outlet drainage ditch will be conveyed to the existing drainage ditch that is located between the Bern Metal property and the Conrail/CSX railroad tracks. Riprap material will be placed within the existing drainage ditch at the point of the intersection with the outlet ditch.

4.9 Installation of Permanent Fencing

Permanent fencing will be installed around the Bern Metal property, following completion of cap construction. The fence will consist of 6-foot high chain-link fence. Approximately 1,700 linear feet of fence will be installed around the Bern Metal property. One gate will remain at the end of Bender Avenue to allow access to the Site.

New holes for perimeter fencing will be augered and the displaced soil cuttings will be spread/graded adjacent to each hole. Areas surrounding fence installation will be rough graded to prevent ponding of waters or any depressions.

4.10 Long-Term Operation, Maintenance, and Monitoring

The long-term Operations, Maintenance, and Monitoring (OMM) Plan will outline the responsibilities and training requirements of personnel, as well as provide OMM personnel with an outline of the inspection and maintenance procedures. Others will be responsible for the implementation and overall management of the Site. The responsibilities include staffing, training and supervision of site personnel, budget control, site maintenance, record keeping, and preparation and submittal of reports.

The long-term OMM Plan will contain a groundwater-monitoring plan that summarizes the monitoring well locations, installation procedures, and well development/sampling protocol. The sampling protocol will include the sample collection methodology, sampling parameters to be collected, groundwater samples to be analyzed (including laboratory method and QA/QC protocol), and proposed sampling/reporting schedule.

Also included in the long-term OMM Plan will be Site and cap maintenance issues which include inspections of the cap and perimeter fence, as well as mowing of the cap and cap/fence repairs. The long-term OMM Plan will provide a schedule of the cap and fence inspection schedules.

5. Project Reporting and Documentation

5.1 General

A summary of the project reporting and documentation requirements that will be provided during the remedial action activities is presented below.

5.2 Daily Project Monitoring

During the on-site remedial action activities, field notes, daily project reports, and photographic documentation will be recorded to document the project status. In addition, any modifications that may be encountered during the project will be documented. It is anticipated that weekly job meetings will be conducted.

5.3 Monthly Progress Reports

In accordance with the Consent Decree, monthly progress reports shall be prepared and submitted to the NYSDEC during the construction activities. The progress reports will include the following:

- Describe activities performed to achieve compliance with the Consent Decree during the period;
- A summary of all sampling and analytical results and/or all other data generated or received by the CPRP Group or its contractors;
- Identify all work plans, reports, and other deliverables required by the Consent Decree that were completed and submitted during the previous period;
- Describe all activities that are scheduled for the next period and provide information relating to progress at the Site;
- Information regarding percentage of completion, unresolved delays encountered or anticipated that may affect the future schedule, and a description of efforts made to resolve those delays or anticipated delays;; and
- Modifications to any work plans that have been proposed to the NYSDEC or approved by the NYSDEC.

5.4 Operations, Maintenance, and Monitoring Plan

A detailed long-term OMM Plan shall be prepared and submitted to the NYSDEC. The long-term OMM Plan will be certified, signed, and sealed by a licensed New York State professional engineer.

5.5 Final Construction Certification Report

A Final Construction Certification Report will be prepared and submitted to the NYSDEC for review. The certification report shall include the following:

- A final construction engineering assessment that details construction activities performed during the project, including all changes to the approved remedial design; and

- A certification by a licensed New York State professional engineer that all components of the Final Design Report were constructed in accordance with the approved remedial design.

6. Schedule

6.1 General

This section outlines various schedule elements in connection with implementation of the Remedial Action. It should be noted that the sequence and duration of these schedule elements are subject to potential variation due to actions beyond the control of the CPRP Group.

Contractor Procurement

Within 60 days following the effective date of the Consent Decree, the CPRP Group will identify the remediation contractor selected for this project and will provide NYSDEC with a copy of selected contractor's qualifications.

Upon approval of the CPRP Group's selection for remediation contractor, the CPRP Group will finalize and execute a contract for remedial services with the remediation contractor. Note, completion of this activity is contingent upon establishment of mutually acceptable terms and conditions between the CPRP Group and the remediation contractor.

Pre-Mobilization Activities

Within 10 days following the effective date of the Consent Decree, the CPRP Group will commence activities related to premobilization, which includes:

- Approvals and Permits (including all necessary access agreements);
- Health and Safety Plan;
- Monitoring Well Abandonment; and
- Sampling of Borrow Material Source(s).

As described in Section 3.2, securing necessary approvals, permits and access agreements is highly dependent upon the actions of others. The CPRP Group's goal will be to complete these activities within 90 days following the effective date of the Consent Decree; however, attainment of this goal is contingent upon the cooperation of others.

Within 30 days following contract execution with a remediation contractor, a site-specific Health and Safety Plan will be prepared and submitted to NYSDEC.

Within 30 days following contract execution with a remediation contractor, the monitoring well abandonment will be completed.

Within 30 days following contract execution with a remediation contractor, the sampling of borrow material source(s) will be completed. Samples will be analyzed using standard turnaround time, which is anticipated to be 30 days following sampling. Sample results will be submitted to NYSDEC upon receipt.

Remedial Action Activities

Within 30 days of completion of all pre-mobilization activities, the remedial action activities will commence. As described in Section 4, these activities include:

- Mobilization and Site Preparation;
- Building Demolition;
- Excavation of Impacted Soil;
- Consolidation of Excavated Impacted Soil;
- Backfilling/Restoration of Excavated Areas;
- Construction of Final Cover System;
- Construction of Permanent Stormwater Management Controls; and
- Installation of Permanent Fencing.

Prior to mobilization, a detailed project schedule will be prepared by the remediation contractor, which will reflect implementation of the above activities. This schedule will be provided to NYSDEC.

At the completion of the construction activities, a final site inspection will be scheduled with NYSDEC. Within 45 days following the site inspection, the Final Construction Certification Report (described in Section 5.5) will be submitted to NYSDEC.

Long-Term Operation, Maintenance and Monitoring

Within 45 days following the site inspection, the long-term OMM Plan (described in Section 5.4) will be submitted to NYSDEC.