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WORK PLAN
for
PCB Contaminated Ditch Sediment Removal
Norfolk and Western Railway Co.
Auto Lot "C"
Cheektowaga, New York

Submitted To:

NEW YORK DEPARTMENT
OF ENVIRONMENTAL CONSERVATION
Regional Permit Administrator
Division of Regulatory Affairs
270 Michigan Avenue
Buffalo, NY 14203

Submitted By:

SEVENSON ENVIRONMENTAL SERVICES, INC.
2749 Lockport Road
Niagara Falls, NY 14302

Revised as of 4/19/93

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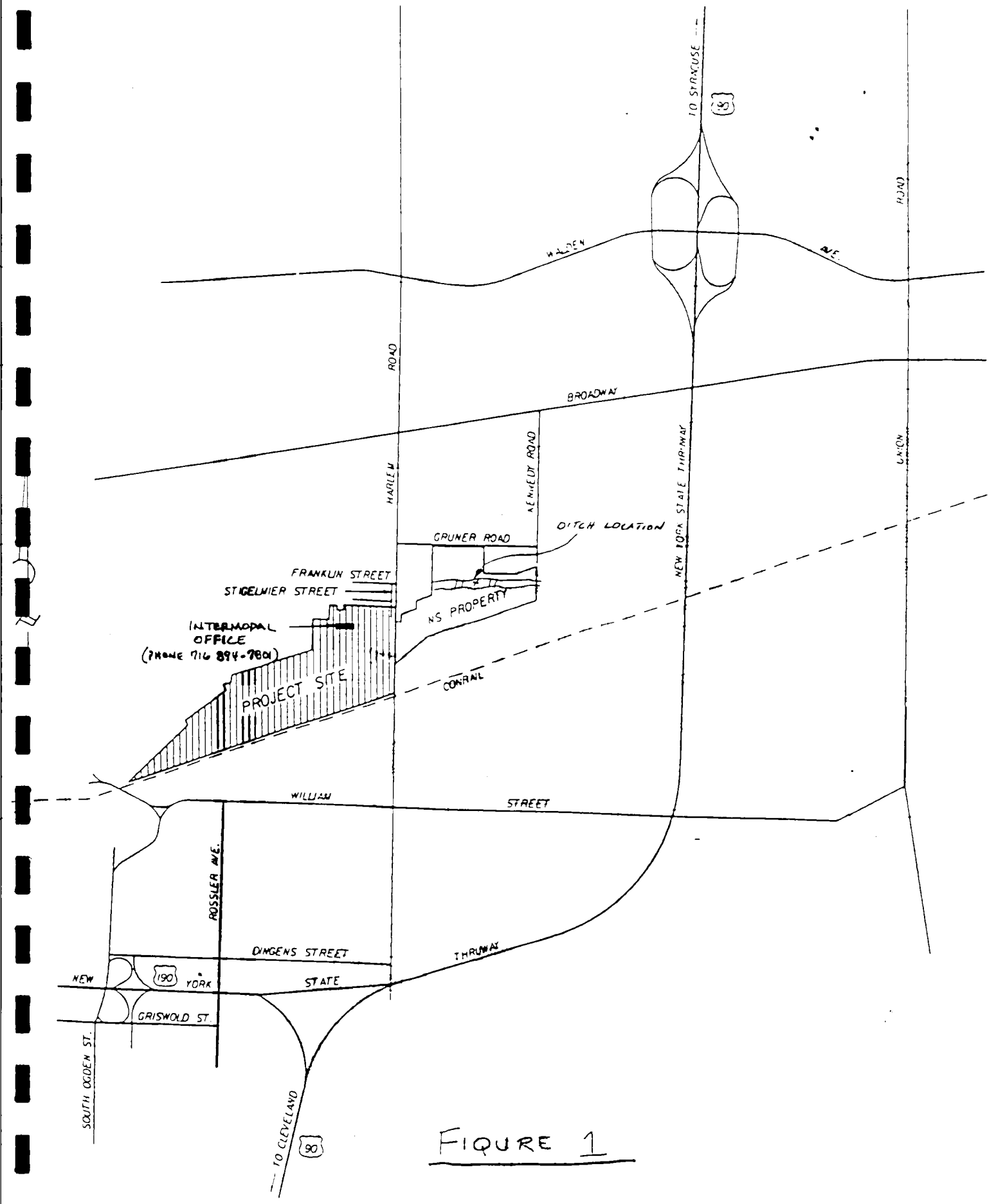
I. INTRODUCTION

Norfolk & Western Railway Co. (NW) is in the process of expanding its automobile handling facility located off Grunner Road in Cheektowaga, New York. Based on the findings presented in Woodward-Clyde's October 1991 draft Remedial Investigation Report for Niagara Transformer Corp., PCB-contaminated sediments were documented in a drainage ditch transversing NW Auto Lot "C" (See Figure 1). The investigation revealed ares with elevated Araclor 1254-1260 contamination at levels in the range of 13 to 33 ppm limited to the upper 6" of sediment.

In order to proceed with the proposed facility expansion, it is necessary to install a drainage culvert within the affected ditch for the construction of an access road. Therefore, NW proposes to remediate the contaminated ditch sediments as needed to avoid significant construction delays.

The NW Corporation has contracted the services of Sevenson Environmental Services, Inc. (SES) to develop the appropriate procedures to remediate the areas in accordance with guidelines as reviewed by the State of New York Department of Environmental Conservation.

The following work plan and associated controls along with a separate site specific Health and Safety plan are being submitted for the above mentioned review and comment.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DITCH LOCATION
FRANKLIN STREET
STIGELMIER STREET
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SOUTH OGDEN ST.
TO CLEVELAND
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FIQURE 1

II. WORK PLAN

1.0. Waste Characterization

SES will perform soil sampling of the designated area (approximately 90 linear feet x 15 feet width x 6" depth (top of sediment). The samples will be composited and analyzed for chemical constituents in accordance with NYSDEC requirements. This sample will be taken prior to mobilization.

2.0. Mobilization

Upon receipt of NYDEC approvals and NW's notice to proceed, Sevenson shall initiate on-site mobilization activities. This shall include moving men and equipment to the site, performing initial surveys, constructing support and equipment facilities. All workmen who will have a need to enter the Exclusion Zone will receive the required site specific training as outlined on the Health and Safety Plan. Due to the nature of this project, work will be scheduled when there is no significant precipitation expected.

3.0. Site Preparation

3.1. Survey Requirements

Immediately upon the completion of mobilization activities, the site will be surveyed to determine the limits of excavations. Areas required to be excavated will be marked with yellow caution tape.

Dewatering of ditch between existing culverts will be completed before any excavation begins. This will be accomplished by temporarily closing off existing culverts with plywood and sand bags and pumping water around excavated area. Once excavation is completed, the sand bags will be removed and disposed of with the excavated soils. A silt fence will then be installed at the entrance to the east culvert pipe. This will prevent any contaminated sediment from flowing downstream onto recently completed remediated area.

4.0. Health and Safety

As previously stated, all site personnel will receive site specific, as well as OSHA training, and will have undergone baseline physicals for medical monitoring.

The Health and Safety Officer (HSO) assigned to the site will direct all aspects of the Health and Safety Plan. The HSO, with direction from the Health Physicist, will determine the levels of protection required to perform the work.

Proper protective clothing (PPE) shall be worn in the work zones as directed by the HSO and the Health Physicist. The amount of tools and equipment allowed to enter the zone will be kept at a minimum.

Once the work zones have been established, site environmental and occupational monitoring will commence in accordance with the Health and Safety Plan.

Composite samples of the top 6" of contaminated ditch (prior to mobilization)?

II-4 "welting"?

III-3 - "radiological" samples? generic WP

During any excavation or dust generating work, Sevenson will continually conduct on-site monitoring for particulates using a portable digital dust monitor.

In order to protect on-site personnel, particulate levels at the Working Site shall be continuously monitored by use of a Sibata P-5 Dust Indicator or equal. Sevenson will monitor the air using the same equipment for 10-15 minutes upwind of the work site to establish background level. The background level shall be established before start of the shift everyday. In the event particulates are detected at levels in excess of 150 ug/m^3 at work site, the contractor shall measure the background concentrations upwind of the Working Site also using the same portable monitor. If the particulate level at the Working Site so measured is less than the two and one-half times the upwind background concentration, or if viable dust is noted, Sevenson will continue to take measurements of the upwind background concentrations and compare such concentrations with the particulate level at the Working Site until such level at the Working Site is less than 150 ug/m^3. If at any time the particulate level at the Working Site measured is more than two and one-half times the measured background concentration, the contractor shall immediately suspend activity at the Working Site, promptly notify the Safety Officer, and implement suitable corrective action to protect on-site personnel before activity resumes.

Suitable corrective action includes:

(1) Applying water on haul roads.

(2) Welting equipment and excavation faces.

(3) Spraying water on buckets during excavation and dumping.

(4) Hauling materials in properly tarped containers.

(5) Restricting vehicle speeds to less than 10 mph.

(6) Covering excavated areas and material.

(7) Reducing excavation size and/or number of excavation.

5.0. Contaminated Soil Excavation

Excavation will proceed after ditch is closed off from upstream water flow. The soil will be excavated approximately 24" deep. The soil will be deposited directly into dump trailers to an approved facility. The bucket of the backhoe will be rinsed off in the last load.

We estimate that the total quantity of soil to be removed will be ±90 cubic yards, or ±180 tons.

6.0. Disposal of Waste

Depending on the classification of material, the waste will be shipped to one of two landfills for final disposal. Non-RCRA hazardous, non-TSCA regulated material would be sent to Athens Hocking Landfill in Logan, Ohio. Non-RCRA Hazardous, TSCA regulated material will be shipped to Chemical Waste Management in Model City, New York.

7.0. Verification Sampling

1. Confirmatory samples shall be collected and analyzed to ensure that contaminated ditch sediments have been adequately removed below where the new culverts are clean. The cleanup goal for the sub-soil is one part per million (ppm) total PCBs. In the event the cleanup goal is not met, the NYSDEC will be contacted to discuss any further remediation activity.

2. Three (3) samples shall be collected, handled, and analyzed using NYSDEC methods. Samples shall be analyzed for PCB's according to *NYSDEC ASP Category B, September 1988, Analytical Procedures for RCRA Organic Methods, Method 8080.*

8.0. Restoration

After verification sampling is received, excavated areas will be backfilled with clean crusher-run stone. This backfill will be compacted by backhoe bucket or other means. The site will be restored to NW requirements to meet or improve upon the existing conditions.

9.0. Demobilization

Upon completion and acceptance of the work, all materials, equipment and personnel will be removed from the site.

III. SPILL CONTROL AND RESPONSE

Scope

During all active work at the site involving the transport and handling of potentially hazardous waste, Sevenson Environmental Services, Inc. (SES) will implement and maintain an on-site Spill Prevention and Contingency Plan. This plan, as presented herein, will provide contingency measures for potential spills of bulked solids handled on site.

Material Handling

(a) Bulked Liquids and Solids

SES will ensure that all vehicles provided for this purpose are in a good state of repair and are operated in a safe manner to prevent spills during the handling of all bulked solids. Haulage units used for bulked solids will be inspected to ensure that their tailgates are secured and the loads are tarped to avoid spillage or tracking of excavated material.

(b) Equipment

SES will have on site the following equipment to be used for any unexpected spills:

- empty polyethylene soil bags,
- shovels.

Hand tools which are used will generally be discarded with the waste material unless it is determined appropriate to decontaminate the tools. If tools are decontaminated, they will receive a final wash. All contaminated materials, including solvents, cloth, soil and wood that cannot be decontaminated shall be properly containerized, labelled, and properly disposed of as soon as possible.

Spill Control and Contingency Plan

In the event that a spill occurs, the following protocols will be implemented:

(a) Notification of Spills and Discharges: If human health or the environment are threatened, SES will notify the NW Manager. NW Manager will notify appropriate regulatory agencies.

(b) Spill Response: If a spill occurs, the following actions shall be implemented by SES:

1. Notify the Contracting Officer immediately.

2. Take immediate measures to control and contain the spill within the site boundaries. This shall include:

   a. Isolating hazardous areas and keeping unnecessary people away.

   b. Prevent people from touching spilled materials.

3. Perform other actions, as required, to control the spill and protect health and safety.

4. Remove solid materials and place them into polyethylene soil bags.

   a. Identify and label all containers as to contents.

   b. Dispose of containers as soon as possible.

(c) Decontamination Procedures: Decontamination procedures may be required after cleanup to eliminate traces of the substance spilled or reduce it to an acceptable level as determined by the Contracting Officer. Personnel decontamination should be evaluated and may include showers and cleaning or disposing of clothing and equipment. All contaminated materials including solvents, cloth, soil, and wood that cannot be decontaminated will be removed to and disposed of properly.

(d) SES will submit a spill report to the Norfolk-Southern Manager which will include the final disposal location.

(e) Sevenson personnel will respond to all on-site spill emergencies. It will be the waste haulers responsibility to respond to all off-site emergencies.

IV. DATA ACQUISITION PLAN/QUALITY CONTROL

1.0 PLANNING OBJECTIVES

1.1 General

This site specific Data Acquisition Plan (DAP) has been prepared by Sevenson Environmental Services, Inc. (SES) in order to properly document the activities for NW Auto Lot "C" Ditch Remediation.

The DAP presents a detailed description of all field sampling techniques, documentation and analytical protocols, and site inspection responsibilities to ensure a quality, well documented project. All aspects of the industrial hygiene requirements, as it pertains to air monitoring protocols (analysis), are included in this DAP also.

1.2 Analytical Laboratory

All analytical testing will be completed by General Testing Corporation (GTC) of Rochester, New York. GTC is a fully State permitted laboratory (NY ID #10145) which has been utilized by Sevenson on past projects and has a proven record of performance.

1.3 Sampling Personnel

Personnel have been designated as sampling personnel. They shall be responsible for the collection and custody of all soil and air samples until the samples are relinquished to the laboratory or express delivery service. Resumes for these sampling personnel are in Section V.

1.4 Sample Identification and Records and Logs

A permanent notebook will be maintained at the site, indicating the time, date and location of collection of each sample. A description of the sample and the sample container number will be included. Map reference will be included as appropriate. Each sample bottle will have a sample label affixed to the outside with the date, time of sample collection, site name, type of sample, and sampler's name recorded on the label. All samples collected (soil, air) will be assigned a unique sequential field sample number. This number will appear on the sample container itself, in the sample logbook, and in any correspondence that references the sample.

a) A daily events log will be generated by the health physicist at the end of each working day. It contains the significant events of the day. Items included are:

1. any personnel contamination events;
2. any airborne radioactivity at or above MPC observed;
3. any medical emergency;
4. a daily characterization of project progress; and
5. any other unusual occurrence that could effect exposure of individuals to radiation, project liability, or project progress.

This log is signed and dated by the project superintendent each day.

1.5 Data Quality Objectives

The basic goal of a Quality Management Plan (QMP) is to assure that the data collected is thoroughly documented, and legally and scientifically defensible. For this DAP the objectives are the following:

- To assure that all air and radiological samples are accurately and precisely collected, analyzed and documented so that proper remediation, decontamination, transportation and disposal of waste material occurs; and that costs incurred by for decontamination, waste handling and/or disposal are correctly derived.

- To ensure compliance with the Department of Transportation and other waste manifest regulations.

- To ensure that samples are properly collected, analyzed and documented to provide data as part of the Contractor Health and Safety Plan, and protect the Norfolk-Southern Company against claims related to exposure to PCB-contaminated soils.

2.0 SAMPLE CHAIN-OF-CUSTODY

Samples will remain under the control of the Sampling Technician in the field until relinquished to the laboratory. Chain-of-Custody documents will be completed for sample package and enclosed in the package. In addition, a sample log of all samples collected and shipped to the laboratory will be maintained on site.

A typical Chain-of-Custody form which will be employed during the sample transport. Upon receipt of samples at the laboratory, the package and the seal will be inspected for signs of tampering by the designated sample custodian. The conditions of the package and seal will be noted on the Chain-of-Custody form by the sample custodian, and the Chain-of-Custody form will be assigned by the sample custodian.

GTC will employ Chain-of-Custody procedures throughout the handling of the samples in the laboratory from the time of receipt to the completion of analysis. Completed Chain-of-Custody forms describing the transport to and receipt at the laboratory are required to be

returned with the hard copy of the analytical report. Each lab is equipped with a 7-day, 24-hour security system which ensures restricted access to samples during storage.

3.0 PRECLEANING PROCEDURES

All sampling equipment for chemical analysis (trowels, mixing bowls, augers) will be precleaned prior to use on site and again before each reuse. The procedure will be as follows:

1. Detergent (Alconox) and water wash.
2. Deionized water rinse.
3. 5% HNO_3 rinse and/or Methanol rinse (depending upon analyte concern)
4. Deionized water rinse.
5. Final deionized rinse.

Where practical, dedicated, disposable, sampling equipment will be utilized to further reduce the possibility of cross-contamination.

4.0 SAMPLE SHIPMENT

All soil samples will be packed in coolers after collection and labeling. Samples will be shipped at the completion of the day's sampling activities to the appropriate laboratory. Samples will be stored at the laboratory until analysis is complete.

5.0 DATA QUALITY ASSESSMENT

The laboratory will review data and identify results where additional work is required. This additional work may take the form of re-analysis or resampling and analysis.

Internal quality control tests will be conducted by CEP and in accordance with their standard operation procedures and the individual method requirements. The quality and

acceptability or unacceptability of the data will be determined by SES following the reporting of the laboratory analysis. The data will be examined for the acceptability of trip blanks, field blanks, blind duplicates, and other laboratory quality assurance data. In the event that data was deemed unacceptable, a decision would be made by SES regarding the sampling and/or re-analysis requirements.

5.1 Reporting of Data

1. Data Review

   Final data review and report evaluation will be carried out by SES.

   A final report will be submitted to the New York State Department of Environmental Conservation, Region 9 Office within 30 days. This report will provide the following: project description; project chronology; environmental air sample results; waste shipment characterization and associated data.