URS

May 17, 2002

New York State Department
of Environmental Conservation
270 Michigan Avenue
Buffalo, New York 14203-2999

Attention: Mr. Henry Sandonato, P.E.
Regional Solid and Hazardous
Materials Engineer

RE: *Manhole Sediment Removal Report*
GE Apparatus Service Center
Tonawanda, New York

Dear Mr. Sandonato:

1.0 INTRODUCTION

On behalf of the General Electric Company (GE), URS Corporation (URS) is pleased to submit this *Manhole Sediment Removal Report* (*MSRR*) for GE's service shop in Tonawanda, New York. This *MSRR* summarizes the actions taken to remove PCB containing sediments from two storm sewer manholes near GE's Tonawanda service shop. The removal was conducted in general accordance with the *Manhole Sediment Removal Work Plan* (*Work Plan*), which was submitted to New York State Department of Environmental Conservation (NYSDEC) on September 27, 2001. The *Work Plan* was approved by the NYSDEC in a letter dated October 29, 2001.

The *Work Plan* had been prepared in response to the NYSDEC's letter dated August 24, 2001 which responded to the *Off-Site Storm Sewer Investigation Report*, dated July 13, 2001. This on-going project is being conducted as part of the Corrective Action Program required by GE's May 1996 *6 NYCRR Part 373 Hazardous Waste Management Permit*.

This *Report* is organized in three sections. Section 2.0 summarizes the scope of work and Section 3.0 describes the sediment removal.

2.0 SCOPE OF WORK

The objective of the *Work Plan* was to remove sediments, which contain PCBs at concentrations greater than 50 mg/kg, from on-site manhole STMH-3 and off-site manhole MH-1. Figure 1 shows the storm sewers at and near the shop. The scope of work in the *Work Plan* included these four tasks:

Task 1 – Negotiate Access with the Town of Tonawanda
Task 2 – Obtain a Contractor
Task 3 – Conduct Removal
Task 4 – Prepare Summary Report

Section 3.0 describes the completion of the first three tasks. Task 4 is the preparation and submission of this letter report.

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3.0 MANHOLE SEDIMENT REMOVAL

This section summarizes the actions taken to remove sediments with PCBs greater than 50 mg/kg from on-site manhole STMH-3 and off-site manhole MH-1.

3.1 TASK 1 – NEGOTIATE ACCESS WITH THE TOWN OF TONAWANDA

On behalf of GE, URS met with a representative of the Town of Tonawanda Sewer Department to review the *Work Plan* and to gain access to the off-site storm sewer manhole MH-1. The Town of Tonawanda requested advance notice of the sediment removal so that a representative could be present to review the confined space entry procedures.

3.2 TASK 2 – OBTAIN A CONTRACTOR

GE selected Clean Harbors of Albany, New York to remove the sediments from the manholes and dispose the remediation waste.

3.3 TASK 3 – SEDIMENT REMOVAL

On February 28, 2002 the sediments from off-site manhole MH-1 and on-site manhole STMH-3 were removed. Clean Harbors of Albany, New York removed the sediments. Personnel form the Buffalo, New York URS office observed the removal activities. The weather during the removal activities was sunny with temperatures between 30 and 35 degrees Fahrenheit.

The bottom of manhole MH-1 is formed by the lower section of the Milens Road storm sewer line, which is a 30-inch diameter line. The storm sewer line runs through the manhole with a portion of the top of the pipe removed. The configuration of the pipe through the manhole creates a shelved area on either side of the pipe. The primary flow through off-site manhole MH-1 is contained within the pipe channel. The flow at the time of the removal was significant, probably due to snow melt runoff.

Clean Harbors entered manhole MH-1 using confined space entry procedures. Upon inspecting the pipe line within and upstream of the manhole, Clean Harbors reported that there was no sediment within the invert channel or immediately upstream. Rather than risk backing the storm sewer flow up into the neighboring Coke Cola facility, the sediments were removed from the shelved areas of manhole MH-1 without plugging the influent and effluent lines. Clean Harbors used a drum vacuum and scraper to remove the sediments from each of the shelved areas of manhole MH-1. Manhole MH-1 was not wet cleaned because the storm water flow was not isolated.

There was less water flow through on-site manhole STMH-3 than off-site manhole MH-1. Manhole STMH-3 is shaped like a truncated cone and extends approximately four feet below ground surface. The influent and effluent pipes are slightly elevated from the manhole bottom. URS personnel noted that the quantity of sediment in manhole STMH-3 appeared to be the same as when the manhole was sampled in January 2000.

Based on conditions observed in the field, manhole STMH-3 was neither entered during the cleaning nor plugged due to concerns that entering the manhole would have disturbed the sediments and caused suspended particles to wash downstream. Therefore, the water within the recessed bottom of the manhole was carefully removed using a drum vacuum until the water level was below the bottom of the effluent

pipe. The drum vacuum was then used to remove the sediments. Because of the height (approximately four feet) and shape of the manhole there was not enough space to maneuver and securely plug the influent and effluent lines of the manhole. Therefore, manhole STMH-3 was not pressure washed as planned. URS wiped the concrete surface of manhole STMH-3 with a sorbent pad to verify that no residue that could migrate downstream remained.

All sediment and water removed from the manholes was containerized in 55-gallon drums. One drum of solid waste and two drums of liquid waste were generated during the sediment removal. Clean Harbors removed the remediation waste from the site on February 28, 2002. A copy of the waste manifest is attached as Appendix A.

oOo

If you have any questions about this *Report*, please contact Dawn Varacchi of GE at (508) 836-6728 or Don Porterfield of URS at (518) 688-0015.

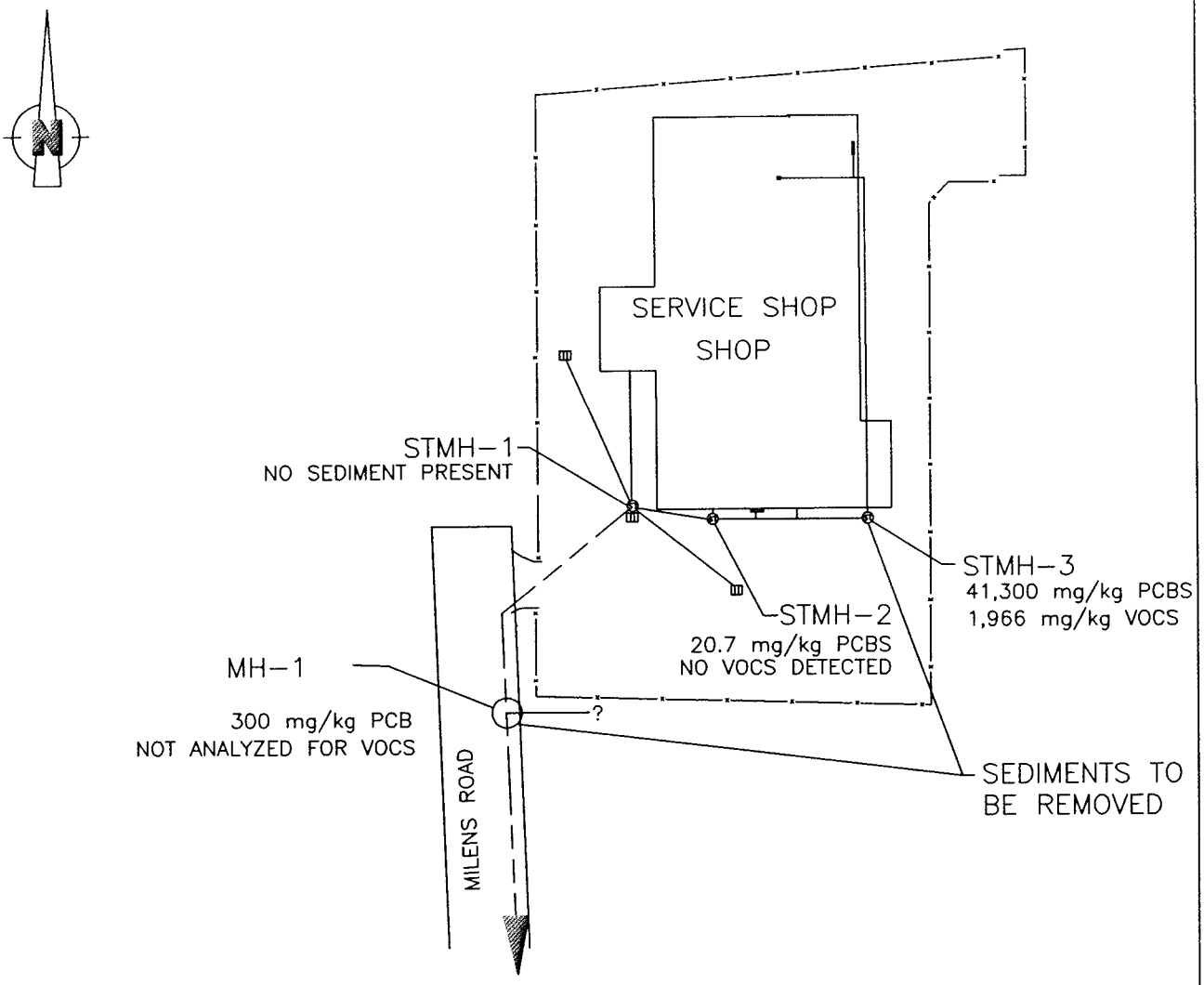
Very truly yours,
URS Corporation

Karen Peppin
Staff Engineer

Don Porterfield, P.E.
Manager – Clifton Park

cc: Ms. Dawn Varacchi – GE
Mr. Tony Hejmanowski – GE
Mr. Roger Murphy – NYSDEC
Mr. Dale Carpenter – USEPA

Attachments: Figure 1 - Storm Sewer Manholes
Attachment A - Waste Manifest



LEGEND

- APPROX. PIPE LOCATION
- FLOW DIRECTION
- MH-3, 3.9 mg/kg – STORM MANHOLE AND ANALYTICAL RESULTS
- STORM SEWER
- CATCH BASIN

APPROXIMATE GRAPHIC SCALE (IN FEET)

0 150 300

SOURCES:
1- TOWN OF TONAWANDA WATER AND SEWER SYSTEM MAPS BOOK 1.
E8B DATED 6-18-99
E8D DATED 6-18-99
F8C DATED 6-24-99
F8A DATED 6-24-99
2- TOWN OF TONAWANDA WATER AND SEWER MAP

REMOVE_SED 09/14/01

FIGURE 1	STORM SEWER MANHOLES
	175 MILENS ROAD TONAWANDA, NEW YORK
URS	646 PLANK ROAD, SUITE 202 CLIFTON PARK, NEW YORK 12065

ATTACHMENT A

WASTE MANIFEST

** TOTAL PAGE.02 **

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF HAZARDOUS MATERIALS
One Winter Street Boston, Massachusetts 02108

Please print or type. (Form designed for use on elite (12-pitch) typewriter)

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. [illegible]
Manifest Document No. 91823
2. Page 1 of
Information in the shaded areas is not required by Federal law.

A. State Manifest Document Number: MA M 691823

3. Generator's Name and Mailing Address:
General Electric Power
175 Milliens Road
Tonawanda, NY 14150

B. State Gen ID: 26 Cooper Avenue, Tonawanda, NY 14150

4. Generator's Phone ( )

5. Transporter 1 Company Name: Clean Harbors Env Services Inc.
6. US EPA ID Number: MAD039322250
C. State Trans. ID: 23055JB NY
D. Transporter's Phone (781) 849-1800

7. Transporter 2 Company Name: CLEAN HARBORS ENV. SERVICES, INC.
8. US EPA ID Number: MAD039322250
E. State Trans. ID: 654315 ME
F. Transporter's Phone (781) 849-1800

9. Designated Facility Name and Site Address:
Clean Harbors of Braintree Inc
1 Hill Avenue
Braintree, MA [illegible]
10. US EPA ID Number: [illegible]
G. State Facility's ID: NOT REQUIRED
H. Facility's Phone ( )

11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. HAZARDOUS WASTE LIQUID, N.O.S. (1,4-dichlorobenzene), 9, NA3082, III	2	DM	00110	G	D027
b. Hazardous Waste Solid, N.O.S. (1,4-Dichlorobenzene), 9, NA3077, III	1	DM	00050	P	D027
c.					
d.					

J. Additional Descriptions for Materials Listed Above (include physical state and hazard code.)
a. (SL), (E), [illegible]
b. (SL), (E), [illegible]
c.
d.

K. Handling Codes for Wastes Listed Above
a. S01
b. S01
c.
d.

15. Special Handling Instructions and Additional Information
11a CH179686 11b CH179686 D027 D007
IN EMERGENCY, CALL CHES 1-800-545-8222 [illegible]

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: ANTHONY HEJMANOWSKI — Signature: [signature] — Date: 02 28 02

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: John W Potts III — Signature: [signature] — Date: 02 28 02

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name: ARMAND R BONCA — Signature: [signature] — Date: 03 04 02

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: [illegible] — Signature: [signature] — Date: 03 04 02

In case of emergency or spill, immediately call the National Response Center (800) 424-8802.

Form approved OMB No. 2050-0039
EPA Form 8700-22 (Rev. 9-88) Previous editions are obsolete.
[illegible] has appropriate permits for & will accept the waste the generator is shipping

COPY>3: FACILITY MAILS TO GENERATOR