



reports SMP approval

14 November 2007  
Lockport Transit Street MGP Site

William Ottaway, PE  
MGP Remedial Section, 11<sup>th</sup> Floor  
Division of Environmental Remediation  
NYSDEC  
625 Broadway  
Albany, NY 12233-7014

RECEIVED

NOV 19 2007

Division of Environmental Remediation

Subject: Lockport Transit Street, Site No. 9-32-098  
Final Approved Site Management Plan

Dear Mr. Ottaway:

Enclosed with this letter is the final DEC approved site management plan. Please contact me if you have any questions regarding this submittal.

Sincerely,

Tracy L. Blazicek, CHMM  
Lead Analyst, Environmental  
Site Investigation & Remediation

Cc w/o enclosure  
Joe Simone

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Site Management Plan

Lockport-Transit Street Former MGP Site

# **SITE MANAGEMENT PLAN**

**FOR ACTIVITIES AT**

**LOCKPORT TRANSIT STREET  
FORMER MANUFACTURED GAS PLANT (MGP) SITE**  
City of Lockport, Niagara County, New York

**November 2007**

**Prepared By:**

**NYSEG Site Investigation & Remediation Group  
Corporate Drive, Kirkwood Industrial Park, P.O. Box 5224  
Binghamton, New York 13902-5224**

**Reviewed and Approved By:**

**New York State Department of Environmental Conservation**

**Site Management Plan**

**Lockport-Transit Street Former MGP Site**

## Site Management Plan

### Lockport-Transit Street Former MGP Site

- **Dewatering Excavation.** Water that contains sheen should not be discharged to storm sewers or the barge canal. Contaminated or stained water should be placed in storage containers (i.e. 55-gallon drums or larger containers).
- **Dust Control** should be accomplished by wetting soil with water.
- **Equipment Decontamination.** prior to leaving the work area, soil that has accumulated on equipment should be removed. Tar contaminated equipment will require washing prior to leaving the area of excavation. Washing should be conducted over the open excavation (at the conclusion of excavating contaminated soils and prior to the equipment contacting clean backfill materials). Wash water should be allowed to infiltrate the soil in the open excavation. At no time shall rinse water or contaminated soil removed from equipment be allowed to contact surface soils or clean backfill material.
- **Personnel Decontamination.** at a minimum, should consist of removing soil from footwear and removing any clothing with coal tar on it prior to leaving area of excavation. Workers should wash hands prior to leaving area of excavation, smoking, eating, drinking and/or using toilets.
- **Material Storage.** Bulk Soil and containerized waste materials (i.e., soil, water, PPE and poly) should be placed in a designated area at NYSEG's Operations Center on Lincoln Avenue. NYSEG will be responsible for all disposal.
- **Backfilling Requirements.** Soils that are not contaminated or stained may be used for backfill. Those soils should be placed back into the excavation first. If additional soils are required to bring the excavation back to grade, they should be clean material imported from a non-contaminated site.

### 3.0 CONTACT LIST

NYSDEC: Mr. William Ottaway: Division of Environmental Remediation  
NYSDEC

625 Broadway  
Albany, New York 12233-7014  
Office Phone: (518) 402-9662  
E-mail: [wsoottawa@gw.dec.state.ny.us](mailto:wsoottawa@gw.dec.state.ny.us)

NYSEG: Primary  
Mr. Tracy L. Blazicek: Site Investigation & Remediation Group  
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Corporate Drive, Kirkwood Industrial Park, P.O. Box 5224  
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NYSEG: Secondary  
Mr. Bert W Finch: Site Investigation & Remediation Group  
NYSEG

# **NYSEG**

Site Management Plan

Plattsburgh-Bridge Street Former MGP Site

Corporate Drive, Kirkwood Industrial Park, P.O. Box 5224

Binghamton, New York 13902-5224

Office Phone: (607) 762-8683

E-mail: [bwfinch@nyseg.com](mailto:bwfinch@nyseg.com)

## ATTACHMENT A

### EMERGENCY EXCAVATION PROTOCOL

For Area of Transit, LaGrange and Saxton Streets Adjacent to, and Including the Former Manufactured Gas Plant Site Located at the Corner of Transit and LaGrange Streets

*Emergency Excavation:* Immediate excavation activities are necessary to ensure the safety of human health, the environment or major property damage (i.e., major storm sewer break or blockage).

### PROCEDURES IN ORDER OF IMPORTANCE

1. **Do not endanger your own life. Survey the situation before taking any action.** Take whatever action is necessary to ensure the safety of human health and the environment. If at all possible, take action that will avoid or minimize excavation at a depth eight feet or more below ground surface.
2. **Personal Hygiene.** at a minimum, should consist of workers washing hands prior to leaving area of excavation, smoking, eating, drinking and/or using toilets. Smoking, eating and/or drinking is not permitted in the vicinity of the excavation.
3. **Personal Protective Equipment (PPE).** at a minimum, workers should don long sleeve shirt, long pants, work boots and work gloves. If soil is stained or coal tar is visible, then workers should don rubber boots, tyvek suits or rain suits and nitrile or other chemical resistant inner gloves.
4. **Soil Handling.** Contaminated or stained soil should be handled to minimize contaminating adjacent areas. Contaminated or stained soil should be placed on polyethylene sheeting (poly) or in either 55-gallon drums or waste wranglers. If sidewall and bottom of excavation is heavily stained, then the excavation should be lined with poly prior to workers entering excavation.
5. **Dewatering Excavation.** Water that contains sheen should not be discharged to storm sewers or the creek. Contaminated or stained water should be placed in storage containers (i.e. 55-gallon drums or larger containers).
6. **Equipment Decontamination,** prior to leaving the work area, soil that has accumulated on equipment should be removed. Tar contaminated equipment will require washing prior to leaving the area of excavation. Washing should be conducted over the open excavation (at the conclusion of excavating contaminated soils and prior to the equipment contacting clean backfill materials). Wash water should be allowed to infiltrate the soil in the open excavation. At no time shall rinse water or contaminated soil removed from equipment be allowed to contact surface soils or clean backfill material.
7. **Personnel Decontamination,** at a minimum, should consist of removing soil from footwear and removing any clothing with coal tar on it prior to leaving area of excavation. Workers should wash hands prior to leaving area of excavation, smoking, eating, drinking and/or using toilets.
8. **Material Storage.** Bulk Soil and containerized waste materials (i.e., soil, water, PPE and poly) should be placed in a designated area at NYSEG's Operations Center on Lincoln Avenue. NYSEG will be responsible for all disposal.
9. **Backfilling Requirements.** Soils that are not contaminated or stained may be used for backfill. Those soils should be placed back into the excavation first. If additional soils are required to bring the excavation back to grade, they should be clean material imported from a non-contaminated site.

### 10. **Notify NYSEG Site Investigation & Remediation Group as soon as practical after emergency is under adequate control.**

Primary: Tracy L. Blazicek

Normal working hours phone: (607) 762-8839

After hours phone: (607) 237-5325

E-mail: [tblazicek@nyseg.com](mailto:tblazicek@nyseg.com)

Secondary: Bert W Finch

Normal working hours phone: (607) 762-8683

After hours phone:  
E-mail: [bwfinch@nyseg.com](mailto:bwfinch@nyseg.com)

(607) 725-4312

11. NYSEG will notify NYSDEC Division of Environmental Remediation

## ATTACHMENT B

### URGENT EXCAVATION PROTOCOL

For Areas of Transit, LaGrange and Saxton Streets Adjacent to, and including the Former Manufactured Gas Plant Site Located at the Corner of Transit and LaGrange Streets

*Urgent Excavation:* While not an emergency, excavation cannot wait more than 5 days. Work may require NYSEG to develop a job specific work plan that would be approved by NYSDEC.

### PROCEDURES IN ORDER OF IMPORTANCE

1. Notify NYSEG MGP Remediation Group  
Primary: Tracy L. Blazicek (607) 762-8839  
After hours phone: (607) 237-5325  
E-mail:tblazicek@nyseg.com  
  
Secondary: Bert W Finch (607) 762-8683  
After hours phone: (607) 725-4312  
E-mail: bwfinch@nyseg.com

1. NYSEG will notify NYSDEC Division of Environmental Remediation
2. Notify Dig Safely New York. Phone: (800) 962-7962
3. Personal Hygiene. at a minimum, should consist of workers washing hands prior to leaving area of excavation, smoking, eating, drinking and/or using toilets. Smoking, eating and/or drinking is not permitted in the vicinity of the excavation.
4. Personal Protective Equipment (PPE). at a minimum, workers should don long sleeve shirt, long pants, work boots and work gloves. If soil is stained or coal tar is visible, then workers should don rubber boots, tyvek suits or rain suits and nitrile or other chemical resistant inner gloves.
5. OSHA 40-Hour Hazardous Waste Operator (HAZWOPER) trained workers will be required to perform excavation in highly contaminated areas (This requirement will be determined by NYSEG and NYSDEC).
6. Real-Time Air Monitoring (NYSEG) for volatile organic compounds (VOCs) and dust.
7. Soil Handling. Contaminated or stained soil should be handled to minimize contaminating adjacent areas. Contaminated or stained soil should be placed on polyethylene sheeting (poly) or in either 55-gallon drums or waste wranglers. If sidewall and bottom of excavation is heavily stained, then the excavation should be lined with poly prior to workers entering excavation.
8. Dewatering Excavation. Water that contains sheen should not be discharged to storm sewers or the creek. Contaminated or stained water should be placed in storage containers (i.e. 55-gallon drums or larger containers).
9. Dust Control should be accomplished by wetting soil with water.
10. Equipment Decontamination. prior to leaving the work area soil that has accumulated on equipment should be removed. Tar contaminated equipment will require washing prior to leaving the area of excavation. Washing should be conducted over the open excavation (at the conclusion of excavating contaminated soils and prior to the equipment contacting clean backfill materials). Wash water should be allowed to infiltrate the soil in the open excavation. At no time shall rinse water or contaminated soil removed from equipment be allowed to contact surface soils or clean backfill material.
11. Personnel Decontamination. at a minimum, should consist of removing soil from footwear and removing any clothing with coal tar on it prior to leaving area of excavation. Workers should wash hands prior to leaving area of excavation, smoking, eating, drinking and/or using toilets.



**12. Material Storage.** Bulk Soil and containerized waste materials (i.e., soil, water, PPE and poly) should be placed in a designated area at NYSEG's Operations Center on Lincoln Avenue. NYSEG will be responsible for all disposal.

**Backfilling Requirements.** Soils that are not contaminated or stained may be used for backfill. Those soils should be placed back into the excavation first. If additional soils are required to bring the excavation back to grade, they should be clean material imported from a non-contaminated site.

## ATTACHMENT C

### ROUTINE EXCAVATION PROTOCOL

For Areas of Transit, LaGrange and Saxton Streets Adjacent to and including the Former Manufactured Gas Plant Site Located at the Corner of Transit and LaGrange Streets

*Routine Excavation:* Excavation can wait for up to 30 days with minimal consequences.

### PROCEDURES IN ORDER OF IMPORTANCE

#### 13. Notify NYSEG MGP Remediation Group

Primary: Tracy L. Blazicek      Normal working hours phone: (607) 762-8839  
After hours phone: (607) 237-5325  
E-mail: [tlblazicek@nyseg.com](mailto:tlblazicek@nyseg.com)

Secondary: Bert W Finch      Normal working hours phone: (607) 762-8683  
After hours phone: (607) 725-4312  
E-mail: [bwfinch@nyseg.com](mailto:bwfinch@nyseg.com)

1. NYSEG will notify NYSDEC Division of Environmental Remediation  
William Ottaway - phone: (518) 402-9662, E-mail: [wsoffawa@gw.dec.state.ny.us](mailto:wsoffawa@gw.dec.state.ny.us)
2. NYSEG may develop a work plan that would require approval by NYSDEC. If a job specific work plan is not developed follow the minimum procedures for Urgent Excavation.

**Attachment D**

**Community Air Monitoring Plan**

## New York State Department of Health Generic Community Air Monitoring Plan

A Community Air Monitoring Plan (CAMP) requires real-time monitoring for volatile organic compounds (VOCs) and particulates (i.e., dust) at the downwind perimeter of each designated work area when certain activities are in progress at contaminated sites. The CAMP is not intended for use in establishing action levels for worker respiratory protection. Rather, its intent is to provide a measure of protection for the downwind community (i.e., off-site receptors including residences and businesses and on-site workers not directly involved with the subject work activities) from potential airborne contaminant releases as a direct result of investigative and remedial work activities. The action levels specified herein require increased monitoring, corrective actions to abate emissions, and/or work shutdown. Additionally, the CAMP helps to confirm that work activities did not spread contamination off-site through the air.

The generic CAMP presented below will be sufficient to cover many, if not most, sites. Specific requirements should be reviewed for each situation in consultation with NYSDOH to ensure proper applicability. In some cases, a separate site-specific CAMP or supplement may be required. Depending upon the nature of contamination, chemical-specific monitoring with appropriately-sensitive methods may be required. Depending upon the proximity of potentially exposed individuals, more stringent monitoring or response levels than those presented below may be required. Special requirements will be necessary for work within 20 feet of potentially exposed individuals or structures and for indoor work with co-located residences or facilities. These requirements should be determined in consultation with NYSDOH.

Reliance on the CAMP should not preclude simple, common-sense measures to keep VOCs, dust and odors at minimum around the work areas.

### Community Air Monitoring Plan

Depending upon the nature of known or potential contaminants at each site, real-time air monitoring for volatile organic compounds (VOCs) and/or particulate levels at the perimeter of the exclusion zone or work area will be necessary. Most sites will involve VOC and particulate monitoring; sites known to be contaminated with heavy metals alone may only require particulate monitoring. If radiological contamination is a concern, additional monitoring requirements may be necessary per consultation with appropriate NYSDEC/NYSDOH staff.

**Continuous monitoring will be required for all ground intrusive activities and during the demolition of contaminated or potentially contaminated structures.** Ground intrusive activities include, but are not limited to, soil/waste excavation and handling, test pitting or trenching, and the installation of soil borings or monitoring wells.

**Periodic monitoring** for VOCs will be required during non-intrusive activities such as the collection of soil and sediment samples or the collection of groundwater samples from existing monitoring wells. "Periodic" monitoring during sample collection might reasonably consist of taking a reading upon arrival at a sample location, monitoring while opening a well cap or overturning soil, monitoring during well baling/purging, and taking a reading prior to leaving a sample location. In some instances, depending upon the proximity of potentially exposed individuals, continuous monitoring may be required during sampling activities.

Examples of such situations include groundwater sampling at wells on the curb of a busy urban street, in the midst of a public park, or adjacent to a school or residence.

#### VOC Monitoring, Response Levels, and Actions

Volatile organic compounds (VOCs) must be monitored at the downwind perimeter of the immediate work area (i.e., the exclusion zone) on a **continuous** basis or as otherwise specified. Upwind concentrations should be measured at the start of each workday and periodically thereafter to establish background conditions. The monitoring work should be performed using equipment appropriate to measure the types of contaminants known or suspected to be present. The equipment should be calibrated at least daily for the contaminant(s) of concern for an appropriate surrogate. The equipment should be capable of calculating 15-minute running average concentrations, which will be compared to the levels specified below

- If the ambient air concentration of total organic vapors at the downwind perimeter of the work area or exclusion zone exceeds 5 parts per million (ppm) above background for the 15-minute average, work activities must be temporarily halted and monitoring continued. If the total organic vapor level readily decreases (per instantaneous readings) below 5 ppm over background, work activities can resume with continued monitoring.
- If total organic vapor levels at the downwind perimeter of the work area or exclusion zone persist at levels in excess of 5 ppm over background but less than 25 ppm, work activities must be halted, the source of vapors identified, corrective actions taken to abate emissions, and monitoring continued. After these steps, work activities can resume provided that the total organic vapor level 200 feet downwind of the exclusion zone or half the distance to the nearest potential receptor or residential/commercial structure, whichever is less – but in no case less than 20 feet, is below 5 ppm over background for the 15-minute average.
- If the organic vapor level is above 25 ppm at the perimeter of the work area, activities must be shutdown.

All 15-minute readings must be recorded and be available for State (DEC and DOH) personnel to review. Instantaneous readings, if any, used for decision purposes should also be recorded.

#### Particulate Monitoring, Response Levels, and Actions

Particulate concentrations should be monitored **continuously** at the upwind and downwind perimeters of the exclusion zone at temporary particulate monitoring stations. The particulate monitoring should be performed using real-time monitoring equipment capable of measuring particulate matter less than 10 micrometers in size (PM-10) and capable of integrating over a period of 15 minutes (or less) for comparison to the airborne particulate action level. The equipment must be equipped with an audible alarm to indicate exceedance of the action level. In addition, fugitive dust migration should be visually assessed during all work activities.

- If the downwind PM-10 particulate level is 100 micrograms per cubic meter ( $\text{mcg}/\text{m}^3$ ) greater than background (upwind perimeter) for the 15-minute period or if airborne dust is observed leaving the work area, then dust suppression techniques must be

employed. Work may continue with dust suppression techniques provided that downwind PM-10 particulate levels do not exceed 150 mcg/m<sup>3</sup> above the upwind level and provided that no visible dust is migrating from the work area.

- If, after implementation of dust suppression techniques, downwind PM-10 particulate levels are greater than 150 mcg/m<sup>3</sup> of upwind level, work must be stopped and a re-evaluation of activities initiated. Work can resume provided that dust suppression measures and other controls are successful in reducing the downwind PM-10 particulate concentration to within 150 mcg/m<sup>3</sup> of the upwind level and in preventing visible dust migration.

All readings must be recorded and be available for State (DEC and DOH) personnel to review.

June 20, 2000

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