



22 August 2008

Lockport State Road MGP Site

William S. Ottaway, PE
Project Manager
NYSDEC
Division of Environmental Remediation
11th Floor
625 Broadway
Albany, NY 12233-7014

RECEIVED

AUG 28 2008

Remedial Bureau C
Division of Environmental Remediation

Subject: Lockport State Road MGP Site
Site No. 9-32-109
Remedial Action Completion Report and Site Management Plan

Dear Mr. Ottaway:

Enclosed with this letter please find the subject documents for your review, comment and approval. Please feel free to call me at 607-762-8839 if you have any questions regarding this matter.

Sincerely,

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

Cc w/o enclosures: Joe Simone

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Lockport State Rd site
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REMEDIAL ACTION COMPLETION REPORT

NYSEG STATE ROAD FORMER MGP SITE

SITE NUMBER 9-32-109

Prepared by:

NYSEG Environmental Compliance Department

Site Investigation & Remediation Group

AUGUST 2008

1.0 INTRODUCTION

This Remedial Action Completion Report for NYSEG's State Road former manufactured gas plant (MGP) site in the City of Lockport, Niagara County, is being submitted to the NYSDEC as required under Order on Consent (# D0-0002-9309) between NYSEG and the New York State Department of Environmental Conservation (NYSDEC), dated March 25, 1994. This Remedial Action Completion Report documents the implementation of the NYSDEC approved remedial measures at the site.

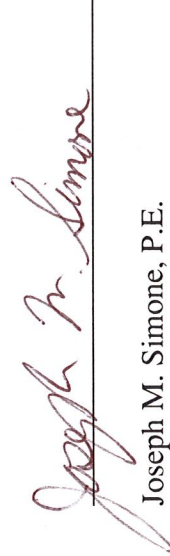
1.1 SITE HISTORY

The State Road site is the location of the former State Road Tar Works, which operated circa 1900 to 1911 as a processing plant for tar generated at the Transit Street Former MGP, which operated circa 1851 to 1927 at a location approximately 700 feet northeast of the State Road site. Both sites are currently owned by NYSEG. The State Road site was used only as a processing and distribution facility (i.e. gas was never manufactured at this site) and included a 500,000 cubic foot gasholder, four tar tanks, an office building, and a warehouse. The structures were demolished between 1948 and 1969. Currently the only permanent structure on the site is a natural gas regulator, owned and operated by NYSEG.

1.2 CERTIFICATION

I hereby certify that all activities that comprised the remedial action were performed in full accordance with the NYSDEC approved letter work plan and Order on Consent Index No. D0-0002-9309 except as described in Section 3.3 herein.

Signature:



Name:

Joseph M. Simone, P.E.

Title:

Manager, Compliance

License Number:

073728



2.0 PROJECT OBJECTIVES

The overall objective of the remedial action was to cover with clean imported material certain areas of surface soils that contained low levels of potentially MGP related semi-volatile organic compounds.

3.0 PROJECT EXECUTION

Work for this remedial action was completed in general accordance with the letter work plan dated November 15, 2007 which was approved by NYSDEC on November 26, 2007. The work for this remedial action was conducted from May 12-16, 2008 by NYSEG's contractor, Severson Environmental Services, Inc. of Niagara Falls, NY.

The work consisted of clearing small trees and brush, grading soils, spreading imported stone and topsoil, and seeding/mulching.

3.1 TREE AND BRUSH REMOVAL

Small trees and brush/bushes were cut and taken off-site for disposal at a yard waste composting facility prior to any soil disturbance activities.

3.2 SOIL GRADING

Following tree/brush removal, existing soils were graded to create a smooth, level surface that generally sloped gently away from State Road.

3.3 PLACEMENT OF DEMARICATION BARRIER

According to the Record of Decision for the site dated March 2007, a demarcation barrier was to be installed beneath imported fill in certain areas of the site so that the original soil surface could easily be identified during any future excavation work. Because of an oversight during remedial construction activities the demarcation barrier was not installed. Accordingly, the Site Management Plan has been designed to account for the fact that a demarcation barrier was not installed and that easy identification of the original soil surface may not be possible.

3.4 PLACEMENT OF IMPORTED MATERIAL

Following grading of existing soils, topsoil and #1 stone were placed in the areas as shown on Photos 1B, 2B, 3B, & 4. A total of 110 cubic yards of topsoil and 58 tons of #1 stone were placed and spread.

3.5 SEEDING

On May 16, 2008 (subsequent to the taking of Photos 1B, 2B, 3B, & 4) the imported topsoil was hydroseeded.

3.6 DISPOSAL ACTIVITIES

No soils were removed from the site. The only material removed from the site for disposal were small trees and brush that were removed prior to soil disturbance activities. The small trees and brush was disposed of at a yard waste composting facility.

4.0 COMMUNITY AIR MONITORING

The NYSDEC approved work plan did not require community air monitoring.

Only the top few inches of site soils were disturbed by the grading operation. Because of previous analytical testing and the shallow nature of those soils, they were not expected to contain volatile organic compounds. No odors of any kind were generated during the grading operation.

Because of the wet weather proceeding the remedial action, existing site soils were sufficiently wet that no fugitive dust was generated during the grading operation. No engineering controls were necessary to control fugitive dust emissions.

5.0 SITE MONITORING

On a periodic basis, the upper, level portion of the site will be inspected to ensure that significant bare spots of soil are not present. Any such spots will be addressed by placing seed and mulch on the area, or by taking other appropriate action to cover the bare spot.

PHOTOS



Photo 1A (top): pre-remediation looking NE along State Road.

Photo 1B (bottom): post-remediation view of same area.



Photo 4: post-remediation view looking SW toward site from State Road.

State Rel Site
#932109

Site Management Plan
Lockport-State Road Former MGP Site

SITE MANAGEMENT PLAN

FOR ACTIVITIES AT

LOCKPORT STATE ROAD
FORMER MANUFACTURED GAS PLANT (MGP) SITE
City of Lockport, Niagara County, New York

August 2008

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

1.0 INTRODUCTION

This Site Management Plan is developed to ensure the safety of the public, workers and the environment during excavation activities at NYSEG's Lockport-State Road former manufactured gas plant (MGP) site. The excavation activities have been divided into three categories as follows:

- **Emergency Excavation:** Immediate excavation activities are necessary to protect human health, the environment or major property damage (i.e., major natural gas leak or distribution system failure), see Attachment A.
- **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, see Attachment B.
- **Routine Excavation:** Excavation can wait for up to 30 days with minimal consequences, see Attachment C.

1.1 *Site Location and Description*

The former MGP site is located on State Road just northeast of High Street in the City of Lockport. The site is bounded by private property on the north, High Street on the south, the New York State Barge Canal on the west, and State Road on the east. The site is owned by NYSEG and presently contains a natural gas regulator station with underground natural gas distribution system piping and overhead electric transmission and distribution lines. This site management plan is designed and written with the knowledge that NYSEG owns and controls the site and the activities that occur upon it. This site management plan will have to be revised to reflect any future changes in ownership.

A remedial investigation was completed in 2007. Low levels of MGP related contaminants have been identified in overburden soil and bedrock at the site. In 2008 clean imported soil and crushed stone were placed over portions of the site to prevent direct exposure to low levels of potentially MGP related contaminants in surface soils.

1.2 *Potential MGP Residues*

Despite the fact that the site is called an MGP, it never produced gas. The site was used to store gas and process tar that was produced at the Transit Street site located approximately one-half mile to the northeast. MGP byproducts which present a potential public safety and environment concern that are or may be present at the site are:

Coal Tar - a black, viscous liquid characterized by a strong odor similar to railroad ties, moth balls or driveway sealer. Coal tar contains a variety of organic compounds which, in sufficient quantities present both short term and long term exposure risks. Coal tar is heavier than water so it tends to sink, but it does contain a fraction that may float on the groundwater surface. Coal tar contains volatile organic compounds (VOCs) which can present an inhalation risk if present in high enough concentrations and semi volatile compounds which can present an inhalation risk from breathing contaminated dust.

Site Management Plan
Lockport-State Road Former MGP Site

Community Air Monitoring Plan shall be followed. This plan is included in this document as Attachment D - Community Air Monitoring Plan.

- **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.
- **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 the site. NYSEG's Compliance Department will be responsible for coordinating 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 Excavation Demarcation Layer

An excavation demarcation layer identifying the boundary between the clean imported soil or crushed stone from the original site surface soils does NOT exist. Therefore, the soil handling and personal protective equipment requirements specified in this site management plan apply to all soils on the site.

4.0 Future Demarcation Layer

If any future site work requires the gravel drive and parking area just out side the gate to the fenced portion of the site to be re-graded or re-worked, an excavation demarcation layer must be installed at that time. The demarcation layer shall be orange plastic

11. NYSEG Compliance Department will notify NYSDEC Division of Environmental Remediation

ATTACHMENT B

URGENT EXCAVATION PROTOCOL

For the State Road Former Manufactured Gas Plant Site

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

12. Notify NYSEG Compliance Department
Primary: Tracy L. Blazicek
Normal working hours phone: (607) 762-8839
After hours phone: (607) 237-5325
E-mail: tblazicek@nyseg.com

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

1. NYSEG Compliance Department 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. Eating and/or drinking are not permitted in the vicinity of the excavation. Smoking is not permitted anywhere on the property.
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.

ATTACHMENT C

ROUTINE EXCAVATION PROTOCOL

For the State Road Former Manufactured Gas Plant Site

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

PROCEDURES IN ORDER OF IMPORTANCE

13. **Notify NYSEG Compliance Department**

Primary: Tracy L. Blazicek

Normal working hours phone: (607) 762-8839

After hours phone: (607) 237-5325

E-mail: tblazicek@nyseg.com

Secondary: Bert W Finch

Normal working hours phone: (607) 762-8683

After hours phone: (607) 725-4312

E-mail: bwfinch@nyseg.com

1. **NYSEG Compliance Department will notify NYSDC Division of Environmental Remediation**

William Ottaway - phone: (518) 402-9662, E-mail: wsottawa@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.

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.

employed. Work may continue with dust suppression techniques provided that downwind PM-10 particulate levels do not exceed 150 mcg/m³ 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/m³ 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/m³ 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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