INTERIM REMEDIAL MEASURE WORK PLAN

06100

TISHCON CORP.
NEW CASSEL INDUSTRIAL AREA
29 NEW YORK AVENUE
NEW CASSEL, NEW YORK 11590

NYS DEC Site I.D. No. 1-30-043V

Prepared For:

New York State
Department of Environmental Conservation
50 Wolf Road
Albany, New York 12233-7010

June 19, 2000

Prepared by:

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1092 Motor Parkway
Hauppauge, New York 11788
631-851-1600

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1.0 INTRODUCTION

1.1 Overview

This Interim Remedial Measure (IRM) Work Plan has been prepared by General Consolidated Industries, Inc. (GCI) for the property located at 29 New York Avenue, New Cassel, New York (tax map designation; Section 11, Block 77, Lots 25-28 and 50-55), referred to hereafter as the Site. The Site is located approximately three-hundred (300) feet north of Old County Road in the New Cassel Industrial Area (NCIA).

The IRM proposed for the site is based upon the findings of the Remedial Investigation report dated January 2000, which was prepared by GCI. During the course of the Remedial Investigation a sludge sample was obtained from the bottom invert level of the one (1) on-site storm water drywell (DW-1). The sample exhibited an elevated PID reading of 50.0 ppm. In addition, the sample was noted to be stained and exhibiting a weathered petroleum odor. The sludge sample was analyzed for volatile organic compounds (VOCs) using EPA Method 8260, semi-volatile organic compounds (SVOCs) base/neutral extractables by EPA Method 8270, total petroleum hydrocarbons (TPH) by EPA Method 418.1 and for the priority pollutant metals using SW-846 Method 6010. The analytical results for the invert level sample from DW-1 were compared to the Recommended Soil Cleanup Objectives listed in the NYS DEC NYS DEC Division Technical and Administrative Guidance Memorandum HWR-94-4046: Determination of Soil Cleanup Objectives and Cleanup Levels (TAGM). The analytical results revealed that there were elevated levels of VOCs and SVOCs present. The TPH analysis revealed a concentration of 70,027 ppm. Additionally, the metals analysis revealed that copper was present at 1,500 ppm, mercury at 0.59 ppm, nickel at 19.4 ppm and zinc at 1,710 ppm, all of which are above their respective TAGM Recommended Soil Cleanup Objectives of 25.0 ppm, 0.1 ppm, 13.0 ppm and 20.0 ppm. Based upon the analytical data it is apparent that the sludge present within DW-1 has been impacted. Therefore, it was determined that an Interim Remedial measure should be conducted in order to remove the contaminated sludge and prevent any further migration of the contaminants.

1.2 Work Plan Approach

The objective of the Interim Remedial Measure (IRM) Work Plan is to outline the course of action which will be undertaken to remediate the contaminated sludge present in drywell DW-1. There are no other environmental concerns which will be addressed by this Work Plan. The anticipated time frame for the IRM activities are presented in Table 1.

2.0 DRYWELL REMEDIATION

2.1 Liquid Removal

A sample of liquid present in DW-1 will be collected and analyzed for waste characterization. The sample will be analyzed using the Toxicity Characteristic Leaching Procedure (TCLP), test Method 1311 as listed in EPA Publication SW-846 "Test Methods for Evaluating Solid Waste, Physical /Chemical Methods". The liquid will be pumped out prior to initiating any remedial activities. The liquid will be transported by a licensed industrial waste hauler and disposed of at a proper waste treatment facility. A waste disposal manifest for the liquid will retained.

2.2 Sludge Removal

A vactor truck will be utilized to remove the contaminated sludge from the bottom of the drywell. The excavated sludge will be continually screened with an HNU photo-ionization detector (PID), in order to detect the presence of volatile organic compounds (VOCs). The excavated sludge will be stored in a 20 yard roll-off container. The sludge will continue to be removed from the drywell until a point at which there is no discernible evidence of contamination noted. A representative sample of the excavated sludge will be obtained for laboratory analysis. The sample will be analyzed using the Toxicity Characteristic Leaching Procedure (TCLP), test Method 1311 as listed in EPA Publication SW-846 "Test Methods for Evaluating Solid Waste, Physical /Chemical Methods". Based upon the results of the analysis, the sludge will be transported off-site by an industrial waste hauler and disposed of at an approved disposal facility. A waste disposal manifest for the sludge will be retained.

2.3 End-point Sampling

Upon completion of the remedial activities, a stainless steel hand auger will be utilized to retrieve a sample from the bottom invert level of DW-1. In addition, a representative sample will also be collected from approximately one (1) foot below the invert level in DW-1. The two (2) samples will be analyzed for VOCs, SVOCs, priority pollutant metals and TPH by EPA Methods 8260, 8270 (b/n), 6010 and 418.1, respectively. The samples will be stored on ice and will be delivered to the laboratory within 48 hours of being collected.

The end-point soil samples from DW-1 will be submitted to Chemtech Consulting Group. Chemtech Consulting Group is a New York State Department of Health (NYS DOH) Environmental Laboratory Approval Program (ELAP) and United States Environmental Protection Agency (US EPA) Contract Laboratory Protocol (CLP) certified laboratory, which is located in Englewood, New Jersey. The ELAP CLP certification number for the laboratory is 10624. The analytical data for the sample will be reported in a NYS DEC Analytical Services Protocol (ASP) Category B deliverables package.

2.4 Quality Assurance/Quality Control Plan

Routine maintenance and calibration schedules will be established according to manufacturer recommendations for all field instruments. All non-disposable sampling equipment (i.e., augers, hand augers, Geoprobe sampling devices, etc.) will be decontaminated between use to prevent cross contamination. Laboratory sample containers will be shipped to the Site in a sealed cooler. A chain of custody form will accompany the containers during transportation, sample collection and analysis. Upon receipt of the sample cooler, field staff will inspect the custody seal to determine if it is intact. The seal number and condition of the cooler upon arriving at the Site will be recorded in a field book. The chain of custody form will be completed at the time of sample collection and included with samples during shipment to the laboratory for signature upon receipt. There will be no QA/QC samples collected or analyzed during the course of the IRM activities.

3.0 ASSESSMENT OF INTERIM REMEDIAL MEASURE (IRM)

3.1 Data Validation

The analytical data obtained will be assembled, reviewed, and evaluated to assure satisfaction of the work plan objectives. The data will be presented in a NYS DEC ASP Category B deliverables package. The data will be reviewed by Mr. Mike Veraldi, the Quality Assurance Officer (QAO) for the project. Mr. Veraldi will develop a Data Usability Summary Report (DUSR) to ensure thorough evaluation of the analytical data. The DUSR will be generated as per the requirements of the NYSDEC Guidance for the Development of Data Usability Summary Reports.

The primary objective of the DUSR will be to determine if the data meets the specific project requirements. The data collected will be utilized to determine if the contaminated sludge has satisfactorily been removed form DW-1.

3.2 Data Evaluation

Once it has been determined that the data is valid, the analytical results will be evaluated in order to determine the effectiveness of the remedial measures. The analytical results will be compared to the Recommended Soil Cleanup Objectives listed in the New York State Department of Environmental Conservation (NYS DEC) Division Technical and Administrative Guidance Memorandum (TAGM) HWR-94-4046: Determination of Soil Cleanup Objectives and Cleanup Levels. The comparison will be utilized in determining the effectiveness of the remedial efforts.

3.3 Interim Remedial Measure (IRM) Report

An Interim Remedial Measure (IRM) report will be formulated which will detail the work performed, the field observations and data collected, the results of all laboratory analysis and appropriate conclusions and recommendations. If deemed necessary, upon completion of the IRM activities the drywell will be backfilled to an appropriate depth so that the structural integrity of the drywell remains intact. The drywell will be backfilled utilizing clean sand. The total amount of backfill will depend on the final conditions encountered at the site.

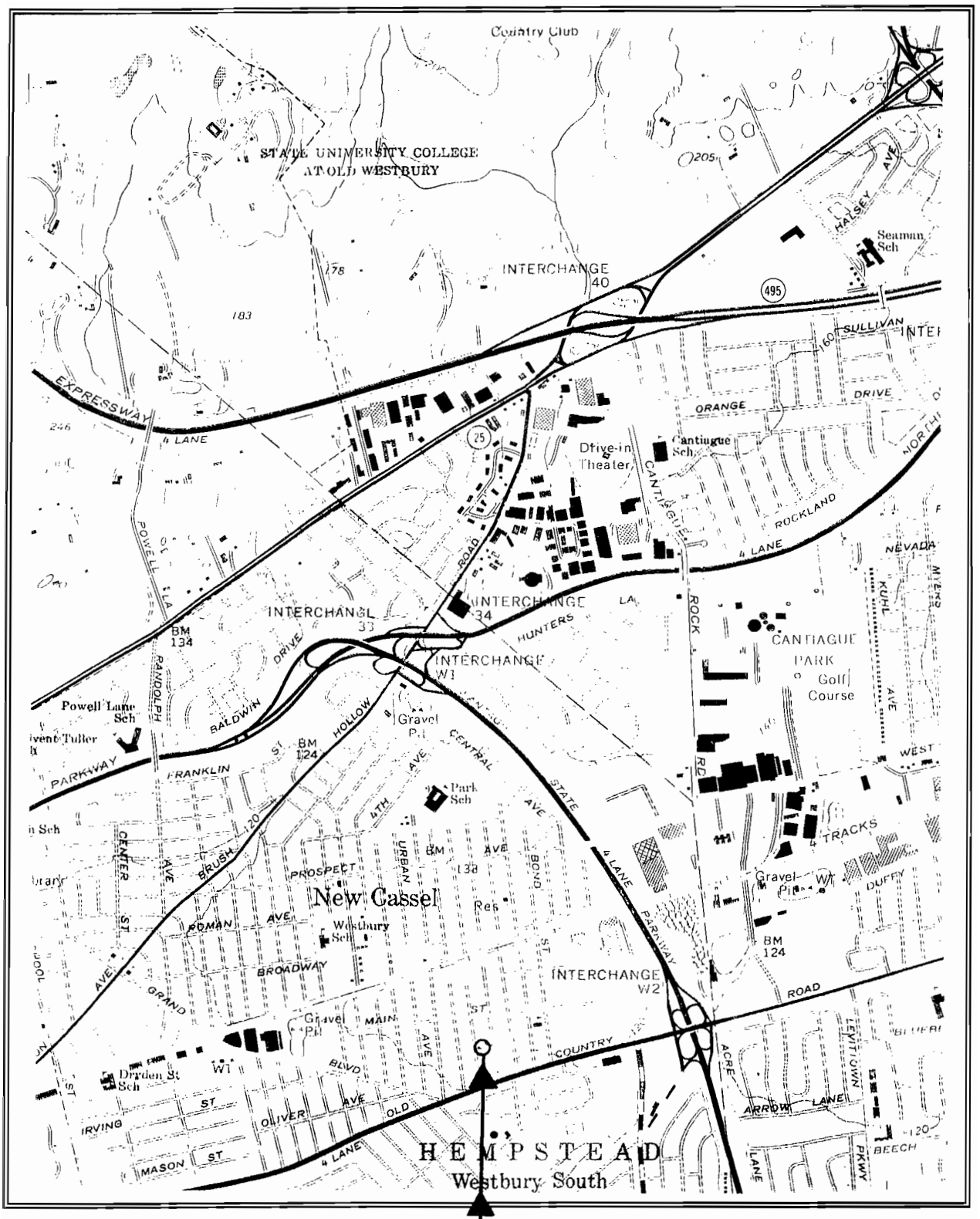
TABLES

TABLE 1

Estimated Time Schedule For The Interim Remedial Measure (IRM) Activities

Task	Description	Time In Weeks									
		1	2	3	4	5	6	7	8	9	10
1	Liquid Sampling & Waste Characterization	X	X								
2	Liquid & Sludge Removal			X							
3	End-point Analysis & Waste Characterization				X	X					
4	Conduct Additional Sampling (if necessary)						X				
5	Data Validation							X	X		
6	Report Submission									X	X

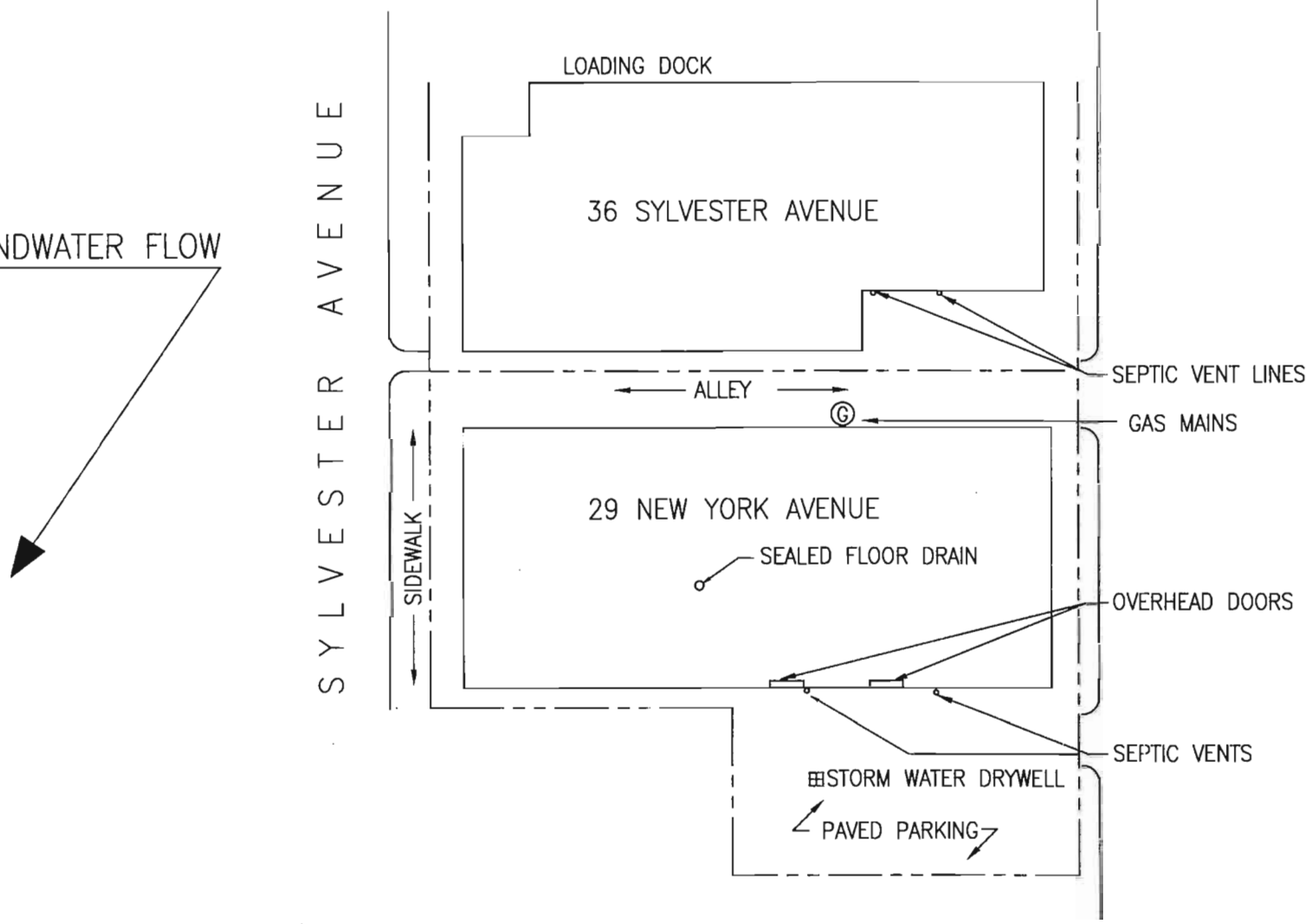
FIGURES



U.S.G.S. 7.5 MINUTE TOPOGRAPHIC MAP

29 New York Avenue
New Cassel, New York

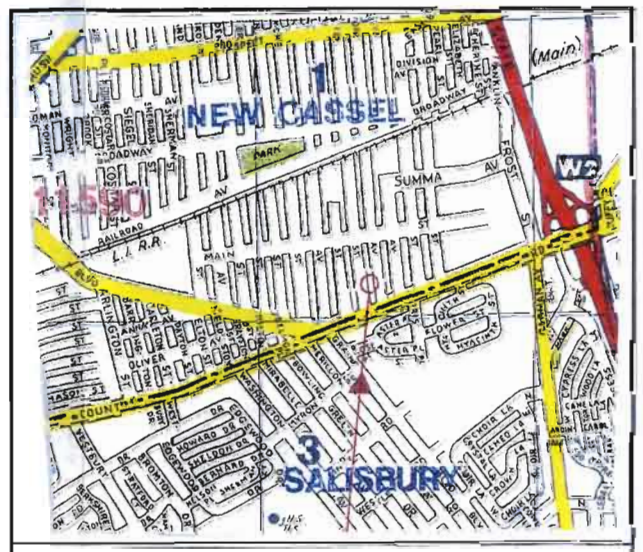
Scale: 1,24000 **Map Name: Hicksville, NY**



SITE PLAN

50 25 0 50 100 150 200 250

GRAPHIC SCALE 1" = 50'-0"



LOCATION MAP

LEGEND

PROPERTY LINE

BUILDING OUTLINE

GAS MAINS Ⓖ

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TITLE:	FIGURE 2 – SITE PLAN		
LOCATION:	29 NEW YORK AVENUE NEW CASSEL, NEW YORK SECTION: 11 BLOCK: 77 LOTS: 25–28 AND 50–55		
DRAWN BY: CC	DATE: 9 / 13 / 99		
CHECKED BY: AT	DATE: 9 / 13 / 99		
LAST REVISED BY:	DATE: ---	SCALE: 1"=50'–0"	FIG. No.: 3 OF 4