WORK PLAN

Duplicate

PCB CONTAMINATED SOIL REMOVAL
FORMER BUILDING NO. 9
ROCKY POINT, LONG ISLAND, NEW YORK

Prepared For:

GENERAL ELECTRIC, INC.
REAL ESTATE AND CONSTRUCTION OPERATION

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1.0 INTRODUCTION

Hart Engineers, Inc. (HART) is pleased to present this work plan describing the removal of PCBs containing soil within the boundaries of former Building No. 9 located on the New York State Game Lands, Rocky Point, Long Island, New York. The Work Plan is being written on behalf of the General Electric, Inc. Real Estate and Construction Operation. This work plan was constructed on the assumptions that: 1) excavation and disposal is based on PCB concentrations only; and, 2) that the clean-up standard for PCBs will be 50 ppm. If these assumptions change then portions of the scope of work may be altered.

1.1 Purpose of Work Plan

The purpose of the Work Plan is to design a soil removal plan within the former Building No. 9 boundaries on the New York State Games Land at Rocky Point, Long Island, New York. The removal action to be overseen by HART will consist of the following major tasks: initial sampling and evaluation of the extent of PCBs above the clean-up level, and the excavation and disposal of soils within Building No. 9.

This Work Plan outlines the activities to be conducted and the manner in which the activities will be implemented on the site.

1.2 Site History

The New York State Game Lands at Rocky Point and Riverhead, Long Island, New York are the former transmitting and receiving facilities, respectively, of the Global Communications Division of the RCA Corporation, Inc. (RCA). These facilities were used extensively during the early and middle parts of this century to provide worldwide communication capabilities for both military and private uses.

The main buildings at each facility were the primary control and communication centers, with ancillary buildings and structures around the sites providing support services such as power generation, power control, and signal enhancement capabilities. The majority of the properties were covered by a gridwork of timber antenna supports several hundred feet high. In 1978 RCA turned the facility over to the State of New York.

1.3 Previous Investigation

In 1982, RCA and the New York State Department of Environmental Conservation (NYDEC) entered into a voluntary agreement to address the remediation of the Rocky Point and Riverhead Sites. RCA commenced remedial activity which included removal of electrical equipment, PCB transformers and PCBs in soils. All materials were removed to permitted disposal sites.

In 1985, RCA again conducted a remedial action plan for the sites. Work included removal, transportation, and disposal of soils in the vicinity of Building No. 9 and concrete decontamination of the first floor of Building No. 9. While approving the action taken by RCA, the NYDEC expressed additional concerns over perceived deficiencies in the Remediation Plan. In particular, the NYDEC suggested the installation of ground water monitoring wells to alleviate concerns regarding the potential for ground water contamination at Building No. 9. In addition, the NYDEC suggested the construction of an impervious cap over the entire area of PCB containing soils adjacent to Building No. 9.

In 1987, the NYDEC along with RCA - now owned by General Electric Company (GE) inspected the site to evaluate current conditions and to identify additional areas warranting attention. Remediation work began in August 1988 and was performed by O. H. Materials (OHM). Construction Quality Assurance/Quality Control was provided by Hart Engineers, Inc. (HART). Remediation of Building No. 9 at this time included the installation of an impermeable cap over the soils

adjacent to building No. 9 and the installation of two monitoring wells. In addition, OHM removed concrete and soil from the first floor of Building No. 9. All of the soils and concrete which were removed were hauled to Chemical Waste Management's Model City facility for final disposal in a secure landfill. The remaining concrete and soil were sampled until the PCB levels for the soil were less than 10 ppm and the levels for the concrete were less than 100 ug/100 sq. cm. OHM demobilized from the Rocky Point site upon completion of the Building No. 9 remediation.

However, additional test results of soil samples obtained from within Building No. 9 by the NYDEC showed PCB levels greater than 50 ppm. To alleviate the NYDEC's concerns, General Electric's Corporate Environmental Program Department (CEP) made the decision to return to the Rocky Point Site and remove additional concrete and soil from within Building No. 9.

Remediation began in September of 1989 and was completed during October 1989. Table 1-1 lists the samples collected by the NYDEC and OHM and analytical results and Figure 1-1 illustrates the relation of the sample points. Additional soil and concrete were removed from the floor of Building No. 9 and hauled to Chemical Waste Management's Model City Facility for final disposal in a secure landfill. Excavation and soil disposal in Building No. 9 progressed until the footings and foundation of the building were exposed. The structural integrity of the building became a concern and work was stopped. It was considered prudent to cease soil removal until the NYDEC could demolish the structure. At that time the excavated area was backfilled to re-establish foundation support and to ensure stability of the Building. OHM placed a layer of visqueen plastic over the existing excavated area and clean sand over the visqueen until the area was back to grade.

Once the NYDEC demolished Building No. 9 additional soil samples were collected to determine the extent of PCBs in soil in the area. NYDEC and OHM testing of the soil revealed levels of PCB's above 50 ppm and the existence of 1,2,4-trichlorobenzene. The results of this sampling is summarized in Table 1-2. Based on these analytical results, the NYDEC has requested that GE continue remediation of the site.

2.0 SCOPE OF WORK

2.1 Introduction

This section describes the steps to be taken to perform the removal action within Building No. 9 at the New York State Game Lands, Rocky Point. This section contains task descriptions that specifically identify the type of work to be undertaken in each task, the sequence they should be conducted in and the number and type of samples to be collected. The tasks identified are:

TASK 1 - Delineation of PCBs in Soil
- TASK 1A - Initial Sampling
- TASK 1B - Evaluation of Analytical Results and Delineation of PCBs in Soil
- TASK 1C - Determining Method of Disposal

TASK 2 - Dust Control Measures

TASK 3 - Soil Excavation
- TASK 3A - Excavation of PCBs in Soil
- TASK 3B - Conduct Sampling and Perform Additional Excavation
- TASK 3C - Closure

TASK 4 - Final Report

It is possible that Task 3B may need to be repeated in order to completely satisfy the removal criteria.

2.2 Removal Action Plan Scope of Work

2.2.1 Task 1A: Initial Sampling

The initial sampling plan outlined in this task description will delineate the extent of the PCBs within Former Building No. 9. The sampling will be conducted on an approximate 10 foot x 10 foot grid

within the base of the building and along the north wall. Figure 2-1 illustrates the proposed sampling locations. Twenty (20) grab samples will be collected using a previously decontaminated hand auger at a depth of one foot below the visqueen layer that was installed prior to backfilling; split samples will be collected by NYDEC. Enough soil will be collected for PCBs analysis. To ensure that a representative PCBs sample is being collected by the field team and NYDEC, soil will be placed in a stainless bowl and mixed thoroughly prior to filling the sample jars.

All sampling equipment will be decontaminated prior to use following USEPA protocol. The procedure will consist of a soapy solution scrub (Alconox or equivalent), distilled water rinse. After air drying, equipment will be wrapped in aluminum foil to prevent contamination.

Samples will be analyzed for PCBs using a Dexsil L2000 PCB field analyzer. The sampling and analysis protocols are described in more detail in Section 3.2. The results of the initial sampling will provide information on: 1) the extent of PCB's in soil; and, 2) the method of disposal of such soil.

2.2.2 Task 1B: Evaluation of Analytical Results and Delineation of PCBs

Based on the results of the initial floor sampling, the areas of removal will be determined. If analytical results are greater than 50 ppm (sometimes referred to as the "Clean-up Standard") then a 10 foot x 10 foot by 2 foot deep area of soil surrounding this sampling point will be removed. After removal, the area will be resampled as described in Section 2.2.5. If results are less than 50 ppm then the final confirmation sample will be submitted (Section 2.2.6).

2.2.3 Task 1C: Method of Disposal

The results of the initial sample will aid in determining the method of disposal. Soils containing PCBs will be transported to the APTUS facility in Coffeyville, Kansas for incineration, to the Chemical Waste Management facility in Emelle, Alabama or to GSX in Pine Wood, South Carolina.

2.2.4 Task 2: Dust Control Measures

August through October are typically fairly dry months and during these months natural precipitation may not be sufficient to suppress dust generation in the vicinity of former Building No. 9. If dust generation becomes excessive during the excavation, then dust control measures as determined by the Project Manager may be implemented. This may consist of periodic spraying of the excavation area and roadway with potable water.

2.2.5 Task 3A: Excavation of PCB Soil

Based upon the results of the initial sampling, the area to be removed will be determined as discussed in Section 2.2.3. The initial removal will consist of the excavation of between 200 yds^3 and 4,000 yds^3. If post-excavation sampling (Section 2.2.6) establish that any remaining soil exceeds the clean-up standard, then the soils in excess of that standard will be removed. This task requires that the contractor (1) excavate the soil described above, and (2) dispose of it in a TSCA or RCRA approved hazardous waste landfill or incinerator (Section 2.2.3).

Since the side walls of the excavation will be partially collapsed and not remain vertical, a maximum slope of 45 degrees from horizontal should be maintained. In addition, all material adhering to the foundation and concrete footing and the surficial two inches of oil stained concrete along the North Wall will be scraped off and

disposed of with the material. Soil and material removed from the excavation area may be staged in a preselected area on either 40 mil HDPE or a triple layer of visqueen. At the end of the removal, this material will be disposed of in a manner similar to the soil. In the event that the area to be removed renders the foundation and/or concrete footings structurally unstable then additional arrangements for the removal and disposal or stabilization of these items will need to be made. All contaminated materials will be loaded onto trucks and transported immediately to the disposal or stabilization facility. The contractor will be responsible for removing all soils and material from within the former Building No. 9 boundaries that contain more than the clean-up standard.

Prior to initiation of any site work, a pre-work meeting will be held to discuss health and safety concerns associated with the site. The contractor will be responsible for the health and safety requirements outlined in the specifications, including the requirements for the decontamination of personnel and equipment.

2.2.6 Task 3B: Conduct Sampling and Perform Additional Excavation

This task consists of: (1) sampling the remaining soils and analyzing the samples for PCBs; (2) evaluating the samples with respect to the clean-up standard established for this site; and, (3) performing additional soil excavation, if necessary. The task would be repeated if additional soil excavation is required.

2.2.6.1 Secondary Sampling and Analysis

The locations of the post-excavation samples in the excavation area are shown in Figure 2-2. Three samples will be collected along the north wall of the foundation and ten samples from the floor area. All soil will be grab samples collected from the base of the excavation. Two jars from each sampling point will be collected; one for initial testing in the field and one for final confirmation by a certified laboratory. Split samples will be made available to NYDEC.

The initial field testing will be completed by using a Dexsil L2000 PCBs analyzer. If the results of the field testing are below 50 ppm then the final confirmatory sample will be submitted to a certified laboratory using EPA SW-846 Method 8080 for PCB analysis. If the results of the field testing are greater than 50 ppm, additional excavation will be required. The sampling and analysis protocols are described in more detail in Section 3.0.

2.2.6.2 Evaluation and Additional Excavation

HART will assemble the data from the initial field testing and review it to determine if and where additional excavation may be required. Additional excavation will be performed in those areas containing concentrations of PCBs greater than 50 ppm.

In general, the additional excavation will take place up to the midpoint between samples with results above 50 ppm and the clean samples which surround it. All additional excavation will be a minimum of two feet deep or at the discretion of the field engineer. The additional soil excavation work will be subject to all the requirements defined in Task 3A: Removal and Disposal of Contaminated Soil.

2.2.6.3 Repeat Sampling and Analysis

HART will collect additional soil samples from the areas where the soil has been re-excavated. Split samples will be made available to NYDEC. The samples will be taken from the bottom of the excavation using the same approach used for the post-excavation field testing initial and final confirmation sampling. The sampling intervals will be adjusted depending on the length and the width of the additional excavation.

The process of excavation and confirmation sample collection will continue until PCBs concentrations in the soil samples are at or below the clean-up standard. Final confirmation samples will be taken to ensure that all soil above clean-up standard has been removed. Samples for final clean-up confirmation will be collected at the same time as the initial field tested samples by splitting a homogenized sample from the excavation bottom. At any sample location where the initial field test PCB sampling results are below the clean-up standard, the split sample will be submitted to a certified laboratory and will use the SW-846 Method 8080 for PCB analysis. The sampling and analysis protocol are described in more detail in Section 3.0.

2.2.7 Task 3C: Closure

This task requires that the excavation either be backfilled or capped using a synthetic material. The closure plan will be decided based on the results of the test pit sampling which will determine which of the methods is most cost effective.

2.2.8 Task 4: Final Report

Upon completion of the removal action, the Consultant will prepare a final report that documents the completeness of the program. This report will include a chronology and description of the actions performed, a discussion of any problems encountered and their resolution, laboratory results of testing, a map showing final dimensions of the excavated areas, the total number of cubic yards removed, manifests demonstrating proper disposal, the ultimate disposal location for the soils, and Quality Assurance/Quality Control (QA/QC) information.

2.3 Task 5: Subsurface Soil Quality Study

At the request of NYDEC a soil boring (B-1) will be completed adjacent to the work area. The boring will be placed at a location designated by a representative of the NYDEC for purposes of

collecting unsaturated soils for analysis of PCB compounds at depth. The boring will be advanced, using nominal 4 inch inside diameter (I.D.) hollow stem augers, to a total depth of 20 feet or until consecutive field test results are less than 50 ppm.

Soil samples will be collected at 5-foot intervals in advance of the augers using standard split-spoon samplers. The samples will be labeled with the project name and number and sample location and interval. Each sample will be analyzed for PCBs using a Dexsil L2000 field analyzer. The sampling and analysis protocols are discribed in Section 3.2. Upon completion the boring will be tremie-grouted to grade using a cement/bentonite slurry concurrent with auger removal.

All downhole equipment will be thoroughly decontaminated using a high pressure steam cleaner prior to and following drilling operations. The split-spoon samplers will be decontaminated between samples using a rinse of soapy water, deep water rinse, methanol wash and distilled rinse.

Soil cuttings produced during drilling will be containerized and stored on-site until receipt of the analytical data. Cuttings will be disposed in accordance with all applicable laws and regulations.

3.0 SAMPLING AND ANALYSIS PLAN

This section contains sampling, analysis, quality assurance, and quality control procedures for the planned removal action at former Building No. 9 at Rocky Point, New York. Items such as sample collection procedures, sampling parameters, number of quality assurance samples, sample documentation, sample custody, field documentation and reporting are addressed.

3.1 Project Description

The objective of the removal action at Rocky Point is to remove and properly dispose of soil located within Building No. 9 boundaries which contain PCBs in concentrations in excess of 50 ppm.

3.2 Project Sampling Program

Initial, post-excavation field and final confirmation soil sample collection and analysis is required in Task 1A and Task 3B. The objective of the sampling program is to confirm that all soil with PCBs concentrations greater than 50 ppm has been removed from the chosen areas. If any samples contain more than 50 ppm, additional excavation and sampling will be conducted. The process of confirmation sampling and additional excavation is described in Section 2.2.6.

All soil samples will be collected with a decontaminated trowel and transferred to a labeled laboratory sample jar. Approximately the top two inches of soil should be collected. Debris such as pieces of plastic, concrete, or metal in the soil will not be included in the sample. Two duplicate samples will also be obtained from the excavation. One will be collected from the center point on the north wall of the excavation and the second will be obtained from one of the bottom sampling points. After sampling, any excess soil will be wiped off the outside of the jar. The jars will be stored on ice in coolers until analysis.

The initial samples will be stored on ice prior to analysis. Analysis will be conducted in the field using a Dexsil L2000 PCB analyzer. This instrument can read levels of PCBs down to 10 ppm and takes ten minutes to run one analysis. This is a conservative approach as this instrument actually measures total chlorine and any PCBs "detected" may only be a part of this total. It is still an effective screening tool for PCBs.

The process of post-excavation sampling consisting of initial field testing and final confirmation samples will continue until PCB concentrations in the soil sample are at or below the clean-up standard. Final confirmation samples will be collected to ensure that all soil above 50 ppm have been removed.

Samples for final confirmation will be collected at the same time as the initial field tested samples by splitting a homogenized sample from the excavation bottom. The field testing on the post-excavation samples will also be analyzed using a Dexsil L2000 PCB analyzer. At any sample location where the post-excavation PCBs sampling results are below the clean-up standard, the split sample will be submitted to a laboratory for PCBs analysis. A medium level extraction and a 4 ppm detection limit will be used to ensure 48 hours turnaround. The sample will be analyzed using SW-846 method 8080 or equivalent. In order to expedite the analysis, the sample extractions will be done by the method of sonication. In the event that the 4 ppm detection limit cannot be met, detection limits will be kept as low as possible. Sample results that are below detection limits will not be accepted if the detection limit is 10 ppm or greater. In such cases, the sample must be re-analyzed.

Excavation will be stopped after all split final confirmation samples show PCB concentrations at or below the Clean-up Standard.

3.3 Data Quality Requirements

3.3.1 Laboratory Detection Limits and Precision and Accuracy

The Quality Assurance (QA) targets for the precision and accuracy of the data and the detection limits will meet the specific conditions stipulated in the analytical method. One field blank will be obtained and submitted for analysis with each ten samples or for each day of sample collection, whichever results in more field blanks.

3.3.2 Data Representativeness

Confirmatory soil samples will be obtained from the excavated areas to ensure that impacted soils have been adequately removed. Samples will be obtained from the bottom of the excavation at ten locations. This should ensure good coverage of the entire excavated area.

3.3.3 Data Comparability

All soil sample results will be reported in ug/kg (ppb) or mg/kg (ppm).

3.4 Sample Custody Procedures

HART personnel will perform all sampling and will retain custody until shipment to the laboratory. At least one chain-of-custody form will be used for each sample shuttle shipped to the laboratory for analysis. Chain-of-custody forms will be provided by the laboratory selected to perform the analytical work.

The field activities will be recorded daily during active site operations in a serialized field logbook. The following information will be recorded in the logbook used at this site:

1) Location where the sample was collected.

2) Name of person who collected the sample.

3) Date and time of sample collection.

4) Sample number.

5) All sampling conditions, i.e., weather, type of material and description of sampling procedure.

The laboratory will provide the field personnel with sample shuttles containing all sample containers necessary for completing field sampling and quality control requirements. Each lot of sample containers are checked for cleanliness by the laboratory and closed to prevent contamination. Each bottle will be labeled to indicate sample number and the type of analyses to be performed on the sample and packaged to prevent breakage.

Samples will be received at the laboratory by the sample custodian who will examine each sample to ensure that it is the expected sample, inspect the sample containers for possible damage, and ensure that the documentation is complete and adequate. The sample custodians will ensure that each sample has been preserved in the manner required by the particular test to be conducted and stored according to the correct procedure. Samples will be stored at $4^{o}C$ until analysis begins. In the event that the integrity of one or more samples is compromised, those sample locations will be resampled.

3.5 Documentation, Data Reduction, and Reporting

All field data will be entered into bound serialized notebooks. Field notebooks, chain-of-custody forms, field data sheets, and lab reports will be filed and stored at the Consultants office. At the completion of the removal action, the Consultant may choose to send these documents to GE.

Data reduction will be accomplished by periodically providing to the quality assurance officer summary tables containing the following information:

1) Sample Collection Date
2) Sample Identification Number
3) Sample Matrix
4) Laboratory Number
5) Analytical Parameter
6) Concentration and Units
7) Analysis Date

The data will be contained in reports to be prepared by the Consultant(s) and submitted to EPA on behalf of GE.

3.6 Data Validation

The results of the final round of sample analyses will be accompanied by a full QA/QC data package with results of quality assurance procedures such as surrogate and spike recoveries and chromatograph calibration. The efficacy of the sampling methods will be checked by comparing the analytical results of samples and their corresponding duplicates, where duplicates have been collected. Large discrepancies in results between samples and their duplicates may also be used, in conjunction with other QA/QC data, to assess the validity of certain aspects of the analytical work itself. Analytical results of the field blanks will be used to determine whether sample cross-contamination could have occurred.

The laboratory will critique its own analytical program by the use of spike addition recoveries, establishing detection limits for each matrix, precision and accuracy control charts, and keeping accurate records of instrument calibrations. The laboratory establishes average recoveries for surrogates over time, standard deviations, control and warning limits. When a sample recovery is outside the control limit, the sample analysis is repeated. If upon

repetition the sample recovery is outside the control limits, the sample will be deemed unsuitable for the method and no further analysis will be conducted on it. Data validation will be the responsibility of the Consultant's QA/QC officer in conjunction with the laboratory's QA officers. A QA/QC evaluation of laboratory data and sampling and analytical procedures used for each sample obtained will be completed and submitted with the report.

TABLE 1-1

RESULTS FROM ANALYTICAL ANALYSIS
CONDUCTED BY NYDEC
SEPTEMBER 28, 1989 AND OCTOBER 19, 1989

ROCKY POINT, NEW YORK

Sample Name	Sample Location	Total PCBs (ppm)
152011NE	Northwest Quadrant	2.7
152011	Northeast Quadrant	670
152011SE	Southwest Quadrant	1.9
152011SW	Southeast Quadrant	0.2
152011W	North Wall	35,000

(T-A-019A)

TABLE 1-2

ANALYTICAL ANALYSIS
ROCKY POINT, NEW YORK

RESULTS FROM ANALYTICAL ANALYSIS
CONDUCTED BY O. H. MATERIALS
JANUARY 21, 1990

Sample Name	1,2,4-Trichloro-benzene (ppm)	Pyrene (ppm)	1,2-Dichloro-benzene (ppm)	Total PCBs (ppm)
6321-90-01	3410	55.4	18.6	26900

RESULTS FROM ANALYTICAL ANALYSIS
CONDUCTED BY NYDEC
APRIL 11, 1990

Sample Name	Total PCBs (ppm)
F1	25
F3	0.29
F4	57
F5	2,100

RESULTS FROM ANALYTICAL ANALYSIS
CONDUCTED BY O. H. MATERIALS
APRIL 30, 1990

Sample Number	Sample Name	Total PCBs Concentration (ppm)
1	6321-90-2	3.166
2	6321-90-3	0.231
3	6321-90-4	252.000
4	6321-90-5	0.960
5	6321-90-6	2.10
6	6321-90-7	7.19

(T-A-019B)

TABLE 3-1

SOIL SAMPLING PARAMETERS
ROCKY POINT, NEW YORK

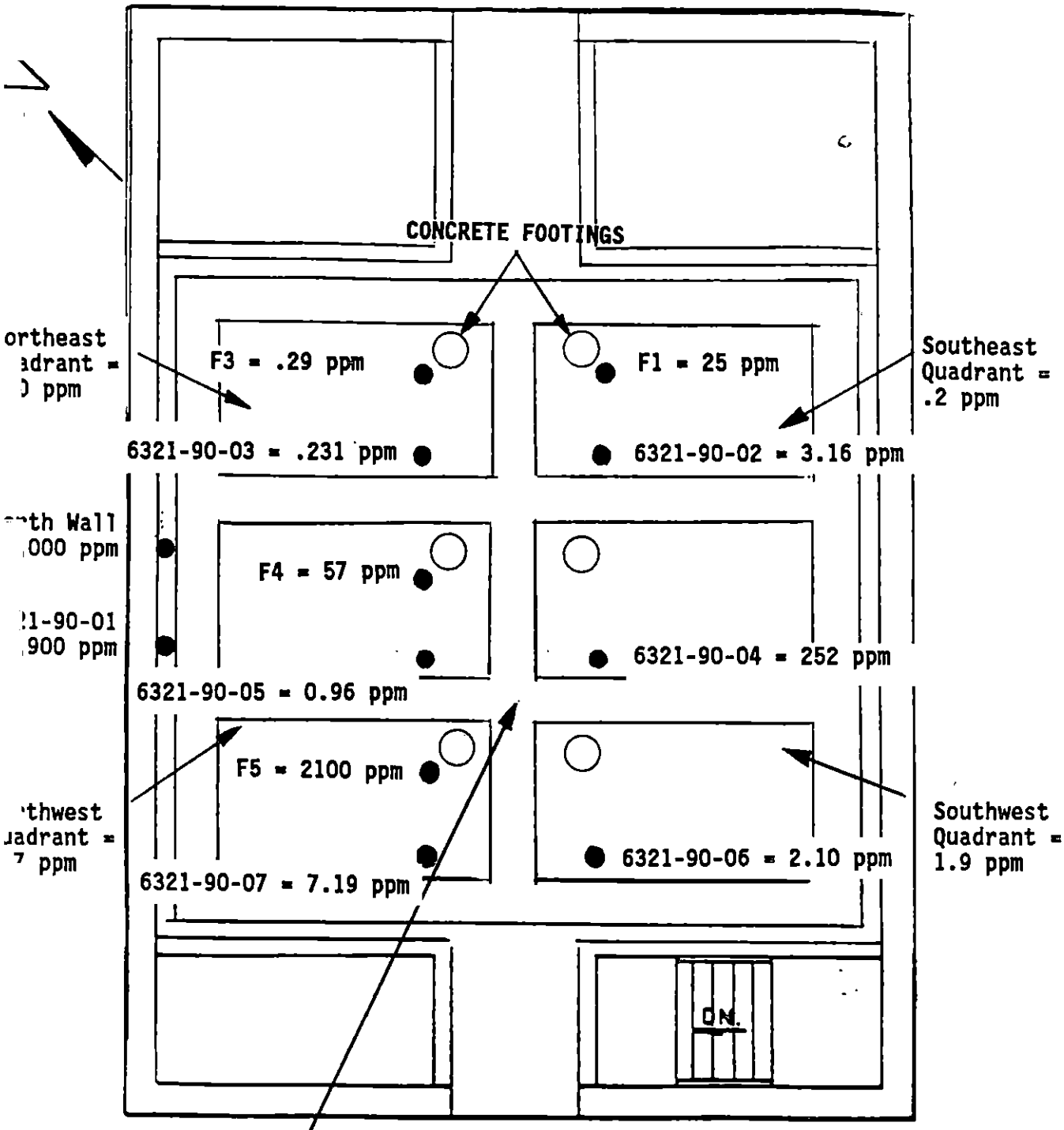
PCB Sample Type	Sample Matrix	Analytical Method Reference	Sample Bottles	Sample Preservation	Holding Time
Initial - Task 1A	Soil	Dexsil L2000 PCB Analyzer	250-500 mL glass bottles	Cool, 4° C	14 days
Field Testing	Soil	Dexsil L2000 PCB Analyzer	250-500 mL glass bottles	Cool, 4° C	14 days
Final Confirmation	Soil	SW-846 Method 8080[1]	500 mL glass bottles	Cool, 4° C	14 days for extraction, 40 days from extraction for analysis[3]
Final Confirmation	Water[2]	SW-846 Method 8080[1]	500 mL or 1 liter glass bottle	Cool, 4° C	7 days for extraction, 40 days from extraction for analysis

1 - This method may be modified to allow for 48 hour turnaround.

2 - All water samples are field blanks.

3 - Holding times for soil are guidelines.

(T-A-019)



AREA OF REMEDIATION-
Approximately 3,800 ft. sq.

(NO SCALE)

NYDEC

Quadrants and North wall	10/19/89
F1 through F5	4/11/90
Roads-non detect	

OHM

6321-90-01	1/21/90
6321-90-2 through 6321-90-7	4/30/90

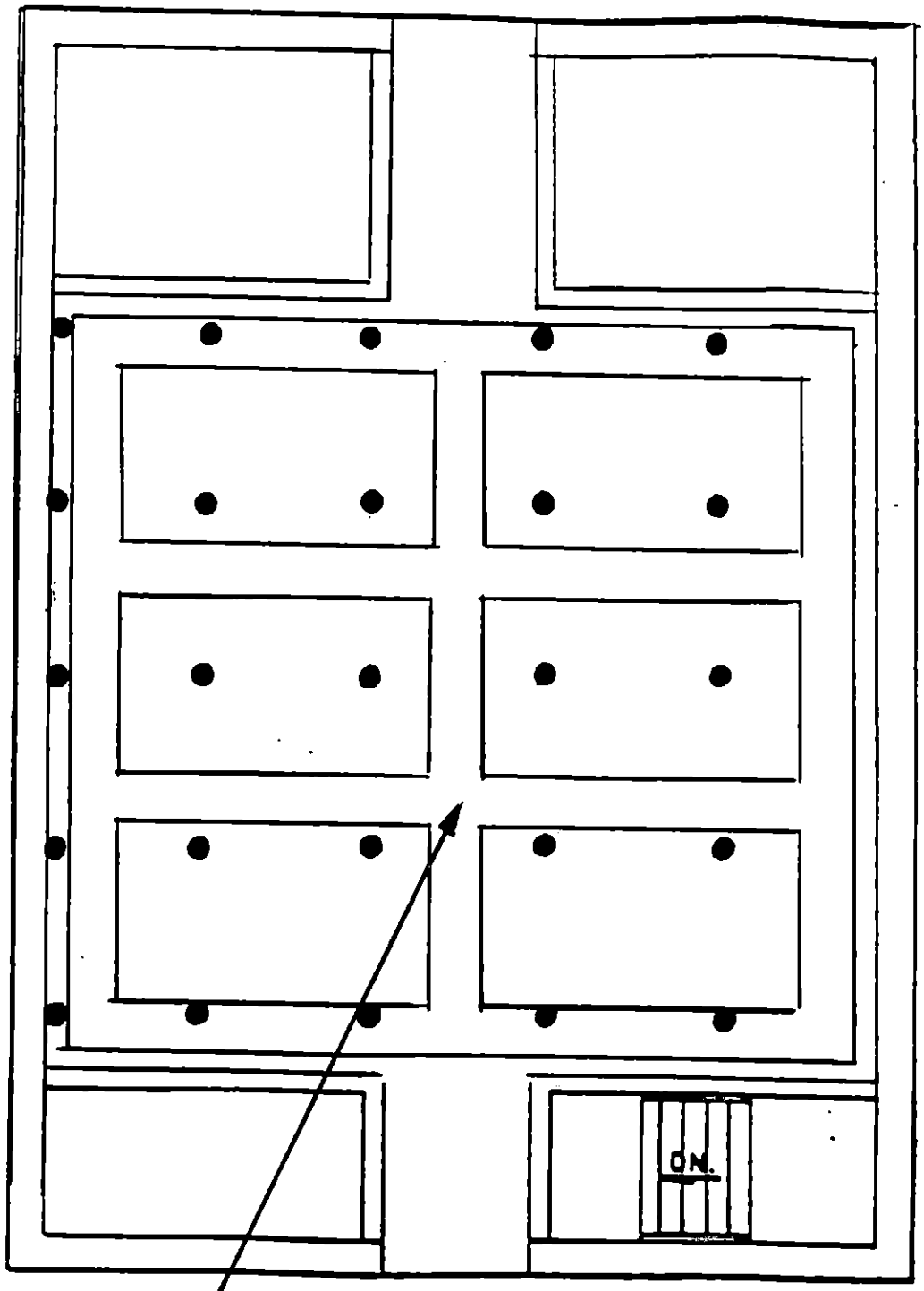
Location of Samples Collected by OHM & NYDEC

9/89 through 4/90

GENERAL ELECTRIC
PRINCETON, NEW JERSEY

HART ENGINEERS, INC.
PITTSBURGH, PENNSYLVANIA

FIGURE 1-1
BUILDING AREA NO. 9
RCA GLOBAL COMMUNICATIONS FACILITY
ROCKY POINT, LONG ISLAND, NEW YORK



AREA OF REMEDIATION – APPROXIMATELY 3,800 FT.^{2}

(NO SCALE)

LEGEND

● – New Sample

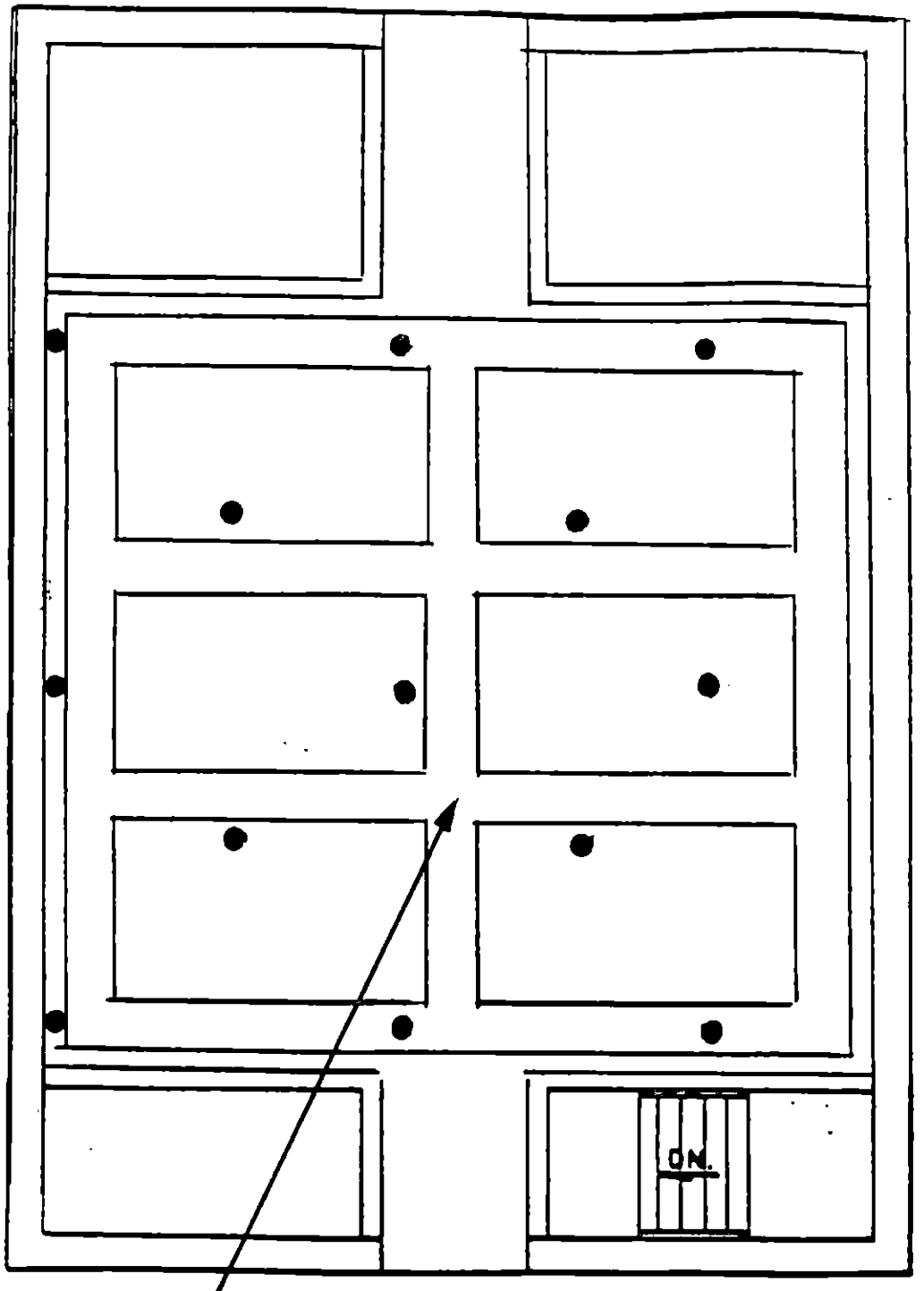
Proposed Location for Initial Sampling- TASK 1A

GENERAL ELECTRIC
PRINCETON, NEW JERSEY

HART ENGINEERS, INC.
PITTSBURGH, PENNSYLVANIA

FIGURE 2-1
BUILDING AREA NO. 9
RCA GLOBAL COMMUNICATIONS FACILITY

SITE REMEDIATION



(NO SCALE)

Proposed Post-Excavation
Sample Locations-TASK 3

GENERAL ELECTRIC
PRINCETON, NEW JERSEY

HART ENGINEERS, INC.
PITTSBURGH, PENNSYLVANIA

FIGURE 2-2
BUILDING AREA NO. 9
RCA GLOBAL COMMUNICATIONS FACILITY
ROCKY POINT, LONG ISLAND, NEW YORK