ARCO ENVIRONMENTAL REMEDIATION LLC.

201 Helios Way
HPL 6th Floor
Houston, TX 77079

23 January 2017

Attention: Ms. Judith Enck
United States Environmental Protection Agency (USEPA)
Region 2
290 Broadway
New York, NY 10007-1866

Subject: Building 52, Hastings-on-Hudson, NY Self-Implementing Clean-up and Disposal Plan

Dear Ms. Enck,

Attached please find the Self-Implementing Cleanup and Disposal Plan for the demolition and transportation and disposal of Building 52 at the AERL Property at 1 River Street, Hastings-on-Hudson, NY. The Self-Implementing Cleanup and Disposal Plan was developed following USEPA and 40 CFR 761.61(a) guidance. This plan pertains only to the demolition of Building 52 on the above referenced property, and is considered to be an interim action prior to the remedial construction activities outlined in ROD (March 2004) and ROD Amendment (March 2012) for OU-1 at the AERL property.

This letter also serves as written certification that the sampling plans, the sample collection and analyses procedures used to assess the site and develop this plan, as well as the demolition plan are at the site and are available for USEPA inspection, per 40 CFR 761.61(a)(3)(i)(E).

Sincerely,

Nick Peterson, P.G.
Project Manager
Remediation Management Services Company
an affiliate of AERL
nick.peterson@bp.com
(832) 664-2372

Copies to:

James Haklar – USEPA
Jess LaClair – NYSDEC
Paul Johnson – BP
Lonnie Fallin – Jacobs
Keith Aragona – Haley & Aldrich

Building 52 Decommissioning and Demolition

AERL

Building 52 Demolition and Transportation and Disposal Self-Implementing Clean-Up Plan

Self-Implementing Clean-Up Plan | 0

January 2017

Building 52 Decommissioning and Demolition

Document title:	Building 52 Demolition and Transportation and Disposal Self-Implementing Clean-Up Plan
Document Reference:	Self-Implementing Clean-Up Plan
Revision:	0
Date:	January 2017
Client name:	AERL
Project manager:	Lonnie Fallin
Author:	Lonnie Fallin

Jacobs
6 Otis Park Drive
Bourne, Massachusetts 02532-3870
United States
T +1.508.743.0214
F +1.508.743.9177
www.jacobs.com

Document history and status

Revision	Date	Description	By	Review	Approved

Introduction

Building 52 is located in the north east corner of the State Superfund Site #360022. The Site is approximately 28 acres, and is located on the eastern bank of the Hudson River within the confines of the Hudson River Valley. The Site was created by filling the Hudson River between the mid-1800s and the early 1900s with the placement of uncontrolled fill using a series of bulkhead walls of various construction types along the western edge. The ground surface at the Site is generally flat; ground surface predominantly ranges from approximately 3 to 11 feet mean sea level.

The Site began industrial operations in the mid to late 1800s and contained several individual businesses that produced diverse products including lumber, plaster, conduit, pipe, electrical cables, and pavement. Two electrical cable companies merged in 1896 and formed the National Conduit & Cable Company, which constructed Building 52 in 1911. Mergers with other business over the next 20 years resulted in the site being owned by the Anaconda Wire & Cable Corporation, which was a subsidiary of the Anaconda Copper Mining Company.

Anaconda Wire & Cable Corporation was awarded a contract from the United States Navy to manufacture electric cable for shipboard use during World War II. The contract required that shipboard cable be heat and flame resistant to withstand heat generated from conducting high electric currents and damage to vessels. PCB mixtures were used to manufacture these products during World War II; PCB use in the manufacturing of cable at the site ceased once the war ended.

After World War II, the Anaconda Wire & Cable Corporation produced electrical and television cable until it ceased operations in 1975. Atlantic Richfield purchased the Anaconda Wire & Cable Corporation in 1977, never operated the facility, and then sold the Site in 1978. In 1998, AR's affiliate, AERL, purchased the Site in order to facilitate environmental investigation and remediation efforts.

Multiple environmental investigations have been completed at the Site since the 1990s to determine the nature and extent of PCB contamination. Administratively, the Site has been separated into two operable units, OU-1 and OU-2. Based on Historical investigations, the New York State Department of Environmental Conservation (NYSDEC) issued a Record of Decision (ROD) (March 2004) and a ROD Amendment (March 2012) to address onshore (OU-1), site wide impacts. The ROD and ROD Amendment requires Site-wide excavation of onshore soils containing PCBs greater than 10 ppm (parts per million), to a maximum depth of 9 to 12 feet and a two foot cover on the site. PCB releases occurred at the site prior to 1978; therefore, remediation of PCBs at “as found” concentrations less than 50 PPM are regulated by NYSDEC. Note that while Building 52 is located within OU-1, the ROD does not include activities associated with Building 52, including demolition and subsurface investigation beneath the slab.

Further background information was provided in the previously submitted Building 52 Demolition Waste Strategy Management Strategy Report, Haley and Aldrich, June 2016 (Demolition Report), as well as follow-up discussions and the draft response to comments provided to the EPA in December 2016.

Nature and Extent of Contamination:

The nature and extent of contamination, as well as the sampling overview including sampling and analysis plan, SOPs and overview of results are summarized in the Demolition Report (June 2016).

Demolition Cleanup Strategy:

This self-implementing cleanup plan only focuses on the strategy for waste generated during the demolition of Building 52 and the subsequent Transportation and Disposal (T&D) of the material, which is considered to be an interim action prior to the remedial construction outlined in the ROD and ROD Amendment. Building 52 is currently scheduled to be demolished during the 1st and 2nd quarters of Calendar Year 2017, with building demolition and associated T&D taking up to 13 weeks once all approvals are received and work commences.

Prior to demolition of the structure, existing sumps and floor drains will be cleaned out and the material contanerized for disposal. The sumps and floor drains will then be grouted to prohibit intrusion of water into the subsurface during disposal activities.

The building will then be demolished, with demolition debris containing both bulk and remediation waste being loaded directly into intermodal containers for transport and disposal at the Heritage Environmental Services RCRA Subtitle C Landfill in Roachdale, Indiana (EPA ID: IND 880 503 890). Once the capacity of each intermodal container is reached, it will be covered and driven onto barges docked at a temporary docking facility on the AERL property directly west of the Building 52 footprint. The barges will be transported to the Vanbro Facility on Staten Island where the intermodal containers will be driven off the barges, loaded onto railcars and transported to the Heritage Facility listed above. As part of the demolition, expansion joint caulk within the building footprint with PCB concentrations of greater than 430 ppm will also be removed and the areas grouted.

After demolition of the building, the expansion joints and areas of the concrete pad where sampling indicated that concentrations in the concrete exceeded 50 ppm will be coated with epoxy per 40 CFR 761.30(p)(iii)(A).

Due to the nature of the demolition, and the thorough building characterization which was documented in the previously provided Demolition Report (June 2016), additional areas with higher concentrations of contamination are not anticipated to be encountered during demolition activities. However, if residual liquid is encountered in the pipes during demolition, the liquid will be collected in drums or other appropriate container, and analyzed by EPA method SW846/8082 to determine PCB concentrations (if any). If PCB concentrations are less than 1 ppm, and the liquid passes other disposal criteria, it will be disposed of at the Clean Harbors Cincinnati RCRA

Technical Services facility (OHD000816629). If PCB concentrations exceed 1 ppm, the liquid will be disposed of at the Veolia Technical Solutions Port Arthur TSCA facility (TXR000036251).

During demolition, the exclusion zone will be contained using an erosion and sedimentation (E&S) control barrier which will filter storm water and incidental water used in demolition activities to remove particulate matter which may contain PCBs.

Once demolition is complete, the concrete pad will be double washed and double rinsed per 40 CFR 761, Subpart S. Prior to washing and rinsing the pad, the E&S controls in place for the demolition will be covered with an impermeable barrier (i.e., a geomembrane), and the wash water will be captured and transferred to a frac tank or similar vessel and analyzed for PCBs by EPA method SW846/8082. If PCB concentrations are less than 1 ppm, and the liquid passes other disposal criteria, it will be disposed of at the Clean Harbors Cincinnati RCRA Technical Services facility (OHD000816629). If PCB concentrations exceed 1 ppm, the liquid will be disposed of at the Veolia Technical Solutions Port Arthur TSCA facility (TXR000036251).

Upon completion of the demolition, the E&S barrier will be removed, loaded into an intermodal container, and disposed of consistent with debris generated during demolition activities at the site.

Decontamination:

To reduce the potential that materials potentially containing PCBs (i.e. building debris such as caulk, masonry, brick, etc) are incidentally entrained in tires or chassis, all trucks will go through an automatic truck tire wash to remove any residual material. The water generated from the truck wash will be captured in a frac tank or similar container, and will be disposed of at the Veolia Technical Solutions Port Arthur TSCA facility (TXR000036251). Solids will be disposed with the demolition material.

Non-barging equipment used in demolition activities will be decontaminated by a combination of dry decon and passing through the mobile tire wash prior to demobilization. The equipment will then be sampled via wipes and analyzed for PCBs by EPA method SW846/8082. Equipment will not be removed from the site until analytical results indicate that the wipe concentrations are 10 µg/ 100 cm2 or less.

Once the barging operation is complete, a decontamination pad will be constructed and the spuds will be pulled, laid on the decontamination pad and decontaminated. The rinseate will be collected in frac tanks or similar holding tanks. Sorbent material will be placed on the perimeter of the barge(s) and the landing dock. The barge(s) and docks will be rinsed with a high pressure hot water sprayer, and the water will be collected via a skid mounted vacuum unit and combined with the spud decontamination rinseate, and disposed of at the Veolia Technical Solutions Port Arthur TSCA facility (TXR000036251). The pad will then be decommissioned and the spuds transported off-site.