

Aircraft Rescue and Firefighting/Public Safety Training Facility Project Training Grounds Soils Management Plan

January 31, 1998

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I. PURPOSE

Monroe County is constructing the Aircraft Rescue and Firefighting/Public Safety Training Facility (ARFF/PSTF) located at the Rochester Fire and Police Training Academy. This site recently underwent remediation by the City of Rochester under consent order with the New York State Department of Environmental Conservation (NYSDEC). A major element of the remediation was to remove soil contaminated with various hazardous wastes, including PCB's, fuel/solvent and lead and cadmium contaminated soil. The purpose of this soils management plan is to describe the steps which must be taken to characterize any soil excavated from the fire training grounds below the elevation where the previous remediation was completed and to manage any soil generated which is classified as a non-hazardous special waste or a hazardous waste. It is expected that soil excavated during the project below an elevation of 519 ft msl may still have contaminants present and could be classified either as a special waste or as a hazardous waste.

NYSDEC regulations regarding management of hazardous and non-hazardous special waste are contained in 6 NYCRR Parts 371, 372 and 6 NYCRR Part 360. Proper management requires that care be taken in planning, monitoring and testing excavated soil to properly characterize the soil and ensure proper disposition of the soil. This document provides guidance for the characterization and proper disposal of soils excavated from an elevation below 519 ft msl at the ARFF/PSTF construction site.

II. CITY OF ROCHESTER CONTACTS

Mark Gregor, City of Rochester, Manager, Division of Environmental Quality (428-5978) will provide technical assistance and consultation to Monroe County on issues of soil management and is the designated contact for communications with NYSDEC representatives.

Anne Klumpp, City of Rochester, Environmental Compliance Coordinator (428-7474), will coordinate waste transportation and disposal. Ms. Klumpp will assist Monroe County in securing waste profile acceptance from the disposal facility(ies) and will sign all waste profiles and hazardous waste manifests. She will be available to answer questions on waste transportation and disposal issues.

III. SOIL CHARACTERIZATION

A. Waste Types

It is anticipated that soils excavated from elevations below 519 ft msl may fall into one of three categories of waste:

1. Soil with no chemical constituents above NYSDEC cleanup levels
2. Contaminated soil containing levels of compounds above the NYSDEC cleanup levels, but which is classified as a non-hazardous special waste
3. Contaminated soil exhibiting characteristics which classify it as a hazardous waste

B. Sampling and Analysis

To determine which category these soils fall into, the Contractor must obtain one (1) representative sample per 100 yd³ of soil excavated from below a level of 519 ft msl. Each sample must be analyzed by the contractor for the following:

- NYSDEC Record of Decision cleanup level list, limits are
 - Volatile organic compounds (VOC) by EPA method 8260 (ROD cleanup level = 10 ppm total VOCs),
 - PCBs by EPA method 8080 (ROD cleanup level = 10 ppm total PCBs),
 - Total lead (ROD cleanup level = 250 ppm total lead) and
 - Total cadmium (ROD cleanup level = 10 ppm total cadmium).
- Guidance Values set forth in NYSDEC STARS #1 Policy (EPA methods 8020/8021, 8270)
- Hazardous Waste Characteristic of Toxicity, using the toxicity characteristic leaching procedure (TCLP) for EPA waste codes D004 - D043
- Polychlorinated biphenyls (PCBs) by EPA method 8080

C. Waste Determination Criteria

Soil which fails the TCLP for any of the hazardous waste characteristics of toxicity or contains greater than 50 ppm of PCBs will be classified as a hazardous waste.

Soil which is not characterized as a hazardous waste due to toxicity or PCBs, but which exceed any of the NYSDEC ROD cleanup levels or Stars #1 guidance values will be classified as non-hazardous special waste.

Since many disposal facilities require testing in addition to those listed above, it is recommended to the contractor that the following test also be performed by the contractor on each sample at the time of waste characterization:

- ignitability
- corrosivity
- reactivity
- paint filter test
- percent solids

IV. SOIL MANAGEMENT AND DISPOSAL

A. Soil Meeting all NYSDEC Cleanup Levels

Soils characterized as not exceeding any site cleanup levels or hazardous waste characteristic regulatory levels may be managed as typical construction and demolition debris. Such soils may be re-used on-site or disposed of at an off-site location that can legally accept C&D material. The contractor shall be responsible for selecting off-site disposal of soils meeting all cleanup levels.

B. Non-Hazardous Special Waste

The Contractor shall manage all non-hazardous special waste generated during the project must be managed in accordance with 6 NYCRR Part 360 regulations. Excavated special waste which will be staged on-site prior to off-site shipment must be placed on and covered with 6mm poly sheeting to prevent migration of contaminants. The material must be disposed of at an approved RCRA Subtitle D and 6 NYCRR Part 360 permitted facility such as the Monroe County Mill Seat Landfill.

The City of Rochester will be listed as the generator of the waste on all profiles and shipping papers and a City representative will sign all profiles and shipping papers.

C. Management of Hazardous Waste

The Contractor shall store all hazardous waste generated at the site will be stored in compliance with applicable federal and state hazardous waste management regulations. Hazardous waste stored at the site prior to shipment must be staged on and covered with 6 mm poly sheeting to prevent migration of hazardous waste.

Hazardous waste may be accumulated on site for as period not exceeding 90 days. The waste must be manifested and shipped to a treatment storage and disposal facility (TSDF) before the 90 day accumulation time is up. All hazardous waste will be shipped to CWM on a New York State Hazardous Waste Manifest. Manifests will be reviewed and signed by Anne Klumpp or Mark Gregor. The transporter utilized to transport hazardous waste must be a fully licensed and permitted hazardous waste transporter. A list of possible waste transporters can be supplied by the City to Monroe for this project.

Note to Contractor:

During the remediation project which took place recently at the Fire Academy, hazardous waste soil was shipped to CWM Chemical Services in Model City, New York. Copies of the profiles for these waste streams are attached to this plan. CWM has indicated that the information from the existing profiles can be transferred to new profiles without waiting for a new approval to be obtained to facilitate shipment of any hazardous waste generated during the ARFF/PSTF project.

Waste generated during the remediation project at the Fire Academy met the land disposal restriction treatment standard for the hazardous waste characterization associated with the waste. Should initial laboratory analysis show that the hazardous waste does not meet the treatment standard for land disposal of hazardous waste, an alternative TSDF must be utilized for disposal. The City can assist the County in locating an alternative facility and in profiling the waste into the facility.

V. SITE MONITORING

During Training Grounds excavation work at the site below 519 ft msl, the contractor must provide a health and safety officer on site to monitor the work. The work must be performed in accordance with a Health and Safety Plan approved by the City prior to commencement of work. All site workers performing excavation below 519 ft msl must have received and is current in OSHA 1910.120 Hazardous Waste Operations and Emergency Response training.

VI. SUMMARY OF RESPONSIBILITIES

The Contractor shall:

1. Notify the City of its proposed schedule for performing work involving excavation below 519 ft msl at the site.
2. Sample soil excavated at or below 519 ft msl in increments of every 100 yd³.
3. Perform the analytical testing outlined in this guidance document on waste

excavated at of below 519 ft msl.

4. Stage excavated soil in accordance with this plan
5. Submit proposed disposal facilities and transporters for non-hazardous special waste and hazardous waste to the City for approval prior to any shipment of waste from the site.
6. Have a trained Health and Safety Officer and trained OSHA 1910.120 workers at the site during excavation work.
7. Contract and schedule shipments directly with the disposal facility and transporters for waste removal.
8. Notify the City 24 hours in advance of planned shipments off-site so that a City representative can be present to sign manifests, shipping papers, land disposal restriction forms and other generator paperwork.
8. Prepare necessary profiles, manifests, bills of lading, and any associated paperwork necessary for waste approval and removal and provide completed unsigned original paperwork to the City for approval and signature.

The City of Rochester will:

1. Review and give final approval for waste transporters and disposal facilities submitted for consideration by the contractor within two (2) working days of receipt of proposed transporters and disposal facilities.
2. As the generator, within two (2) working days after receipt of test data, interpret analytical results from the soil samples to determine if the soil should be characterized as non-hazardous special waste or hazardous waste.
3. Sign all waste profiles, manifests, bills of lading and any associated paperwork necessary for waste approval and removal.
4. Be available to answer questions on waste issues related to waste approval and removal from the site.

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