INVESTIGATION/REMEDIAL WORK PLAN

80 STEEL STREET
ROCHESTER, NEW YORK

NYSDEC SPILL #0170284

Prepared for:	Genesee Scrap and Tin Baling Co. Inc. 80 Steel Street Rochester, New York
Prepared by:	Day Environmental, Inc. 40 Commercial Street Rochester, New York
Project No.:	4482I-10
Date:	June 2011

DRAFT

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FIGURES

TABLE

* - If required based on the results of the Site Investigation.

1.0 INTRODUCTION

This Investigation and Remedial Work Plan (Work Plan) was prepared by Day Environmental, Inc. (DAY) on behalf of Genesee Scrap & Tin Baling Co., Inc. (Genesee Scrap), and it describes proposed site investigation and impacted soil removal activities for an active metal recycling facility located at 80 Steel Street, Rochester, New York (Site). This Work Plan is prepared in response to the requirements of the New York State Department of Environmental Conservation (NYSDEC) as stated during, and following, a meeting held with the Department on May 4, 2011. The May 4th meeting followed the submission of a Subsurface Investigation Report (SIR) for the Site prepared by Plumley Engineering (Plumley) of Baldwinsville, New York for Weitsman Shredding, LLC dated April 2011, revised April 28, 2011. The location of the Site is shown on a Project Locus Map included as Figure 1.

1.1 Background

The Site is an active metal recycling facility. Automobiles, appliances, and sheet iron are received at the Site; and are sorted, prepared, and processed throughout the Site for sale as a raw material in steel production. In July 2001, the NYSDEC opened Spill # 0170284 in response to a prior environmental investigation. Genesee Scrap conducted further investigation and subsequent remediation of impacted soil in two areas of the Site (Former Motor Block Area and Former Metal Punching Area) under this single spill number. The investigation and remediation activities in response to Spill #0170284 are described in the Investigation and Remediation Report prepared by DAY for Genesee Scrap dated June 2003. In general, the Investigation and Remediation Report concluded that the detected concentrations of volatile organic compounds (VOCs) and semi-volatile organic compounds (SVOCs) in the confirmatory samples were below the NYSDEC Technical and Administrative Guidance Memorandum 4046 Recommended Soil Cleanup Objectives (RSCOs), with the exception of a limited area beneath a concrete pad and Baling Building in the Former Metal Punching Area. Groundwater was not encountered in the Former Metal Punching Area. Perched groundwater was encountered in three of the nine completed test pit excavations in the Motor Block Area at a depth of 8 to 10 feet below ground surface (bgs). Based on the Investigation and Remediation Report findings, the NYSDEC closed Spill #0170284 on October 20, 2003 and issued a no further action letter to Genesee Scrap.

The SIR was prepared as part of an environmental due diligence assessment of the 6.6 acre Site. The environmental due diligence assessment evaluated the entire Site since automobiles, appliances, and sheet iron are sorted, prepared, and processed throughout the Site. The investigation described in the SIR included the completion of 23 soil borings, installation of ten temporary monitoring wells, field screening, soil sampling, depth-to-water level measurements, and perched groundwater sampling. Soil samples and perched groundwater samples were analyzed for a variety of analytical parameters including VOCs, SVOCs, polychlorinated biphenyls (PCBs), and Target Analyte List (TAL) metals.

The subsurface investigation conducted by Plumley encountered granular fill material across the Site that was typically less than four feet thick, and the fill material extended to a maximum encountered depth of eight feet. Brown to gray sands and silts were typically encountered beneath the fill material at the Site according to the SIR. The SIR indicates that bedrock was encountered

during the investigation at depths ranging from approximately 4 to 14 feet below the ground surface (bgs). The anticipated bedrock at the Site is the Lockport Dolomite Group according to the Geologic Map of New York State Finger Lakes Sheet, Rickard and Fisher, 1970. The SIR identified soils exhibiting elevated concentrations of selected VOCs at soil boring B-13 within the Former Metal Punching Area. In addition, the SIR identified soil exhibiting an elevated concentration of PCBs at surface soil sample location SS-2 near the Motor Block Area. The locations of soil boring B-13, surface soil sample SS-2, and other Site features are provided in Figure 2.

The SIR identified perched groundwater in the overburden materials across a larger portion of the Site than previously noted in the 2003 Investigation and Remediation Report. One reason for this observation is that the SIR was conducted in March 2011. Water levels in March 2011 in the Rochester area were elevated due to the combination of precipitation and snowmelt. Evidence of light non-aqueous phase liquid (LNAPL) or free product was not observed during the investigation. The SIR identified contamination of the perched groundwater in the western portion of the Site noted as the Former Motor Block Area (soil boring B-1) and the Former Metal Punching Area located in the northeastern portion of the Site (soil boring B-13). The metal shredder unit is currently located in the western portion of the Site near the Former Motor Block Area.

Based on the requirements imposed by the NYSDEC during and after a May 4th meeting, this Work Plan includes further investigation of the on-site soil and groundwater, and potential remediation of soil, if required based on the results of the Site Investigation. It is DAY's understanding that the NYSDEC will manage these activities as a single spill. This Work Plan includes soil sampling to delineate the nature and extent of impacted soils at the Site. The soil delineation sampling will be used to determine the amount of impacted soil, if any, requiring remediation. In addition, this Work Plan also discusses the methodology to be used in any soil excavation that is required based on the results of the Site Investigation. Finally, this Work Plan includes an evaluation of the groundwater quality in the bedrock beneath the Site. Additional recommendations will be provided, as warranted, in the reports listed in Section 4.0 of this Work Plan.

2.0 SITE INVESTIGATON

The objectives of the site investigation described below are to evaluate the nature and extent of impacted soil, and to evaluate the groundwater quality in the bedrock aquifer at the Site. It is anticipated that the bedrock aquifer is the upper-most water-bearing unit below the perched groundwater noted in the SIR. The site investigation will be conducted in general accordance with the NYSDEC Division of Environmental Remediation DER-10 Technical Guidance for Site Investigation and Remediation dated May 2010. A summary of the soil, groundwater, and waste characterization sampling is provided in Table 1 of this Work Plan.

2.1 Monitoring Well Installation

Hollow stem auger and rotary drilling methods will be used to complete three monitoring wells into the bedrock aquifer. The proposed monitoring well locations are provided on Figure 2. The proposed monitoring well locations, rationale for installation, and anticipated depth to competent bedrock are listed below.

Monitoring Well #	Proposed Location	Rationale for Installation	Anticipated depth to bedrock**
MW-1	East of Active Shredder	Evaluate bedrock groundwater quality near SIR soil boring B-1	8.2 feet bgs
MW-2	North of Scale Office	Evaluate bedrock groundwater quality at former UST location* & SIR soil boring B-23.	9.1 feet bgs
MW-3	Former Metal Punching Area	Evaluate bedrock groundwater quality near SIR soil boring B-13.	6.75 feet bgs

* A 3,000-gallon underground storage tank (UST) containing gasoline was removed from the Site in 1992 according to the petroleum bulk storage (PBS) database available at www.dec.state.gov (Registration #8-000272)
** Bedrock is defined in the SIR as boring refusal.

Soil samples utilizing a split-spoon sampler will be collected at five-foot intervals from the ground surface to top of competent bedrock. The soil samples will be screened for field evidence of contamination utilizing a photoionization detector (PID). The encountered stratigraphic conditions and field indications of contamination such as staining, odors, presence of LNAPL and PID readings will be documented on the well logs. For the purposes of this investigation, competent bedrock will be defined as refusal utilizing an approximately $4^{1/4}$ – inch inside diameter (ID) hollow-stem auger.

After the competent bedrock has been encountered, the hollow stem augers will be removed and a temporary six-inch inside diameter black iron casing will be placed into the borehole to maintain borehole integrity. The borehole will be reamed out utilizing an approximately $5^{7/8}$ – inch roller bit to a depth of approximately five feet into competent bedrock. A four-inch ID permanent steel casing will be installed and sealed with cement grout to prevent potential surface contaminants from impacting the groundwater quality. The grouted steel casing will be allowed to cure overnight

before conducting further drilling at the subject monitoring well. The bedrock will be drilled using HQ diameter coring bit to a depth of at least five feet below the base of the permanent steel casing. If groundwater in the bedrock aquifer has not been encountered within the top 10 feet of competent bedrock, then HQ coring will continue at five-foot intervals until groundwater is encountered.

The rock cores will be logged by a DAY representative for field evidence of contamination such as elevated PID readings, staining and odors. The DAY representative will also check for signs of bedrock fracturing, weathered surfaces, and lithology and calculate the rock quality designation (RQD) for each core. A summary of the field observations will be included in the monitoring well log and provided in the reports noted in Section 4.0 of this Work Plan.

It is anticipated that the bedrock monitoring wells will be installed utilizing an open borehole type construction. If the borehole beneath the permanently installed casing does not remain open during the drilling effort, the well will be completed as a 2-inch ID polyvinyl chloride (PVC) groundwater monitoring well with a 10-slot well screen and sand pack will be installed. The sand pack would extend approximately two feet above the screened interval, followed by a one-foot thick bentonite seal and concrete grout to the ground surface. The monitoring wells will be finished with a protective flush-mounted curb box and a locking cap.

The downhole equipment and other potentially contaminated materials will be decontaminated utilizing a steam cleaner and potable water between monitoring well locations in general accordance with the guidelines listed in DER-10. Procedures for managing the investigation and decontamination waste are provided in Section 2.5 of this Work Plan.

The location of the monitoring well will be surveyed using a hand-held GPS unit or tape measured relative to existing Site features. The top of the groundwater monitoring well casing will be surveyed relative to the datum established at the Site, which was used to survey the elevation of other wells at the Site.

2.2 Monitoring Well Development

The monitoring wells will be developed following installation and prior to water quality sampling and/or measurement of static water levels. Well development will be conducted at least two days after installation of the permanent steel casing to allow the grout to cure. Well development will be performed utilizing either a new disposable bailer with dedicated cord or a pump and dedicated tubing. No fluids will be added during development, and well development equipment will be decontaminated following development of the subject monitoring well. The well development procedure is outlined below:

- Obtain a pre-development static water level reading.
- Check for the presence and thickness of LNAPL using an oil-water interface probe.
- Calculate the water/sediment volume in the well.
- Obtain a groundwater sample for field analysis using bailer.
- Select a development method and set up equipment depending on method used.
- Begin pumping or bailing.

- Obtain initial field water quality measurements (e.g., specific conductance, temperature, turbidity, oxygen reduction potential (ORP), and PID readings). Record water quantities and rates removed.
- Obtain additional field water quality measurements as water removal progresses. Water quality measurements should be collected once per well volume removed.
- Stop development when water quality criteria are met.
- Obtain post-development water level readings.
- Document development procedures, measurements, quantities, etc.

Development will continue until one or more of the following criteria is achieved:

- pH, specific conductance, temperature and turbidity are relatively stable as defined below for three consecutive measurements;
- a minimum of five well volumes has been removed; or
- the well has been purged to dryness twice with a flow rate less than one gallon per minute (gpm). The well must be allowed to recharge for at least 15 minutes between well purging activities if dryness is encountered.

For the purposes of well development and sampling, the definition of relatively stable for each parameter is listed below:

pH	± 0.2 Standard Units
ORP	± 10% millivolts (mV)
Specific Conductance	± 10% micro Siemens per centimeter (µS/cm)
Temperature	± 0.2 degrees F
Turbidity	± 10% Nephelometric Turbidity Units (N.T.U.)

During development, the purge water will also be observed for the presence of LNAPL. The results of the well development and LNAPL evaluation will be documented on a well development log.

2.3 Groundwater Sampling and Analysis

At least two weeks following completion of the well development activities, groundwater samples will be collected from monitoring wells MW-1, MW-2, and MW-3. Initially groundwater levels will be measured and the presence of LNAPL will be evaluated. The monitoring wells will then be purged utilizing low-flow methods to ensure that the water collected for analytical analyses is representative of the bedrock water-quality. The groundwater will be monitored during low-flow well purging for pH, ORP, specific conductance, temperature and turbidity. Groundwater samples will be collected after the parameters listed above are relatively stable as defined in Section 2.2 of this Work Plan for measurements collected at approximately 10-minute intervals. The procedures and equipment used during the purging and groundwater sampling, as well as the field measurement data, will be documented in the field and recorded on the sampling logs. The groundwater samples will be submitted under chain-of-custody control to a New York State Department of Health (NYSDOH) Environmental

Laboratory Approval Program (ELAP)-certified analytical laboratory for analysis of the following parameters:

- Spill Technology and Remediation Series (STARS) and Target Compound List (TCL) VOCs; and
- STARS SVOCs.

Using static water level measurements and the surveyed elevations from the groundwater monitoring wells, groundwater elevations for the monitoring event will be calculated. The corresponding groundwater elevations and well locations will be used to develop a schematic groundwater potentiometric map illustrating the approximate groundwater elevations and groundwater flow direction across the Site.

2.4 Soil Characterization

Soil sampling will be completed to delineate the nature and extent of any impacted soil at the Site, as required by the NYSDEC during and following the May 4th meeting with DAY representatives. The soil sampling will include the completion of shallow soil borings near soil boring B-13, and surface soil sampling in the vicinity of surface soil sample SS-2.

In vicinity of soil boring B-13, shallow soil borings will be completed to the top of bedrock or into soil exhibiting no field evidence of contamination, whichever is shallower. The soil borings will be completed in an approximate 25' grid pattern around and through the concrete pad located in the Former Metal Punching Area. The proposed sampling grid is four columns wide and four rows deep. The approximate soil boring locations are provided on Figure 3. The actual soil boring locations may be modified based on the field results of this characterization study. For example, if evidence of contaminated soil is observed at a perimeter soil boring, additional soil borings may be completed to further define the nature and extent of impacted soil in this portion of the Site. A concrete coring machine will be used for the proposed locations within the existing concrete pad footprint. Based on information provided by Genesee Scrap, the existing concrete pad is 10-inches thick, and it is constructed with reinforced concrete. To the maximum extent practicable, continuous soil samples will be collected utilizing a direct-push drill rig and Macrocore® samplers. The soil samples will be screened for field evidence of contamination utilizing a PID. The encountered stratigraphic conditions and field indications of contamination such as staining, odors, presence of free product, PID readings etc. will be documented on a soil boring log. Approximately one soil sample from each location will be collected and submitted under chain-of-custody control to a NYSDOH ELAP-certified analytical laboratory for analysis of STARS VOCs. Selected soil samples will be collected for analytical analyses that exhibit evidence of impact, as well as no evidence of impact in order to confirm the field observations and field screening information. If evidence of impacted soils is observed at the top of the bedrock surface, a soil sample will be collected for analytical analyses from this interval. It is anticipated that a total of 16 soil samples will be collected and analyzed for the parameter listed above. In addition, two field duplicate samples will be collected for quality assurance/quality control (QA/QC) purposes.

Surface soil samples will also be collected in the vicinity of surface soil sample SS-2. One soil sample will be collected from the approximate location of surface soil sample SS-2 to verify the

SIR findings. Four additional surface soil samples will be collected in a radial direction around surface soil sample SS-2 in order to delineate the nature and extent of any impacted soil. The approximate surface soil sampling locations are provided on Figure 4. The soil samples will be screened for field evidence of contamination utilizing a PID. The encountered field indications of contamination such as staining, odors, presence of free product, PID readings etc. will be documented on a soil sampling log. One soil sample from each location will be collected and submitted under chain-of-custody control to a NYSDOH ELAP-certified analytical laboratory for analysis of PCBs.

Also, approximately three samples of the soil exhibiting evidence of contamination such as staining, odors, elevated PID readings, etc. will be analyzed for waste characterization purposes. These waste characterization samples are separate from the soil sample analyses listed above. The waste characterization samples will be submitted under chain-of-custody control to a NYSDOH ELAP-certified analytical laboratory for analysis of the following parameters:

- Toxicity Characteristic Leachate Procedure (TCLP) VOCs
- TCLP SVOCs
- TCLP RCRA Metals
- PCBs
- Ignitability
- Reactivity
- Corrosivity

2.5 Investigation-Derived Waste Management

It is anticipated that solid and liquid investigation-derived wastes (IDW) will be generated during the activities outlined in Sections 2.1 through 2.4. Listed below is the anticipated proposed method for handling, characterization and disposal of IDW.

Potentially contaminated liquid wastes will likely include: decontamination water, drilling water, well development water, and well purge water. Liquid IDW will be collected in 55-gallon drums, labeled, and placed at a secure location on the Site. If IDW is generated that is grossly contaminated based on field observations, it may be placed in separate drums and labeled accordingly. It is anticipated that the liquid IDW will be discharged to the Monroe County Pure Waters sanitary sewer system under a sewer use permit. Obtaining a sewer use permit may require additional sampling and analysis of the IDW for the parameters of concern. For the proposes of this Work Plan, DAY anticipates that the liquid IDW will require sampling and analysis for TCL VOCs and RCRA Metals. Any sampling and analysis of IDW necessary to obtain a sewer use permit will be incorporated into the applicable Report listed in Section 4 of this Work Plan.

Potentially contaminated solid wastes will likely include disposable sampling equipment, personal protective equipment (PPE), collected soil samples that were not selected for analytical laboratory testing, and soil cuttings from drilling operations. Disposable sampling equipment and PPE will be disposed in an on-site dumpster and managed with the Site's municipal solid waste. It is anticipated that the solid IDW will be placed on 6-mil plastic sheeting in a secure portion of

the Site. The stockpiled IDW will be covered with 6-mil plastic sheeting. The IDW solids will be characterized and disposed off-site in accordance with the applicable rules and regulations. It is anticipated that the IDW solids will be disposed of during the soil remediation activities described in Section 3.0 of this Work Plan.

3.0 SOIL REMOVAL AND RESTORATION

This Section discusses the procedures that will be used for any soil excavation that is determined to be required based on the results of the Site Investigation described in Section 2.0.

Any impacted soil that is required to be removed based on the results of the Site Investigation will be removed and disposed in accordance with applicable rules and regulations. The soil characterization effort listed in Section 2.4 of this Work Plan will be used to determine the volume of impacted soil that will need to be removed. Prior to implementing the soil removal activities described in this section, a Report will be prepared and submitted to the NYSDEC as specified in Section 4.1 of this Work Plan. This Report will delineate the proposed lateral and vertical extent of the soil removal activities and applicable soil cleanup objectives.

If soil removal under the existing concrete pad in the vicinity of soil boring B-13 is required, it is anticipated that the pad will be removed and recycled or disposed in accordance with applicable rules and regulations prior to conducting any soil removal activities. Also, any soil requiring removal will be directly loaded onto trucks for off-site disposal. Care will be taken to direct stormwater away from any resulting excavations. Care will also be taken to prevent damage to monitoring well MW-3 located in the vicinity of soil boring B-13. Soils adjacent to this monitoring well will be removed utilizing shovels to minimize damage to the steel well casing. Following completion of the site restoration activities in the vicinity of soil boring B-13, the monitoring well will be retrofitted with a new flush-mount well seal to allow for continued use of this area as a metal recycling facility.

Following removal of any impacted soil in the vicinity of soil boring B-13, confirmatory soil samples will be collected to document the quality of the remaining soil. The confirmatory samples will be collected in accordance with DER-10 Paragraph 5.4(b)(5). The depth of the excavation in the vicinity of soil boring B-13 is anticipated to be six feet or less. Due to the relatively shallow excavation depth, one sidewall sample will be collected every 30 linear feet of excavation from a depth of approximately 6 – 12 inches below the ground surface. A minimum of one sidewall sample will be collected from each side of the excavation. Also, one bottom sample will be collected for every 900 square feet of the excavation. A minimum of one bottom sample will be collected from the excavation. The soil samples will be submitted under chain-of-custody control to a NYSDOH ELAP-certified analytical laboratory for analysis of STARS/TCL VOCs and STARS SVOCs.

Following removal of any impacted soil in the vicinity of surface soil sample SS-2, confirmatory soil samples will be collected to document the quality of the remaining soil. The confirmatory samples will be collected in accordance with DER-10 Paragraph 5.4(b)(5). The depth of the excavation in the vicinity of surface soil sample SS-2 is anticipated to be approximately one foot, and the length of each sidewall is anticipated to be less than 20 feet. Due to the relatively small size of this anticipated excavation, only two samples will be collected from the bottom of this excavation. The proposed confirmatory soil sample program may be modified if the excavation area differs from the anticipated size listed above. The soil samples will be submitted under chain-of-custody control to a NYSDOH ELAP-certified analytical laboratory for analysis of PCBs.

Following the collection of the confirmatory soil samples, any excavations will be backfilled with clean material to the pre-existing grade to allow for continued operation of the Site. The backfilled material will either be crusher run gravel or environmentally clean soil. If soil backfill is used, then a minimum of one soil sample will be collected for every 500 cubic yards for analytical analyses to confirm that it is an environmentally clean material. The soil samples will be submitted under chain-of-custody control to a NYSDOH ELAP-certified analytical laboratory for analysis of TCL VOCs, SVOCs, RCRA Metals, Pesticides and PCBs.

4.0 DELIVERABLES

The following documents will be prepared and submitted to the NYSDEC for review. Also, prior notification of the field investigation and any remediation activities will be provided to the NYSDEC approximately five business days before conducting the subject activities.

4.1 Groundwater Investigation and Soil Characterization Report

The Groundwater Investigation and Soil Characterization Report (Characterization Report) will summarize the results of the groundwater and soil characterization activities described in Sections 2.0 through 2.4 of this Work Plan. This Characterization Report will describe any areas recommended for soil removal based on the soil characterization results, prior information documented in the SIR, and a comparison with the soil cleanup objectives (SCOs) for industrial use listed in 6 NYCRR Part 375 regulations and referenced in the NYSDEC Commissioner's Policy Memorandum CP-51, effective December 3, 2010. The industrial use SCOs are proposed based on the current and anticipated future use of the Site as a metal recycling facility. This Characterization Report will include, but will not be limited to, the components described below:

- Technical overview and details on the Site Investigation work performed;
- A description of the soil and groundwater physical characteristics of the Site, including a physical summary of the fill, soil, and bedrock conditions encountered during the investigation activities listed in this Work Plan;
- Identification of SCOs and groundwater standards/guidance values that pertain to the Site;
- Appropriate figures including a project locus map, site plan depicting Site features, sample location maps, and a potentiometric groundwater contour map;
- Data tables including: a table(s) providing specifics on each sample tested (e.g., sample designation, location, date, depth interval, test parameters, summary tables comparing detected constituents to appropriate regulatory criteria; and tables for other various investigation-related data or information). The analytical laboratory results for soil samples tested will be compared to the industrial use SCOs. The analytical laboratory results for groundwater samples will be compared to the applicable New York State groundwater standards and guidance values for class GA waters listed in NYSDEC Division of Water Technical and Operational Guidance Series (TOGS) 1.1.1 dated June 1998 and the subsequent addenda/errata;
- Analytical laboratory reports;
- Field logs, including soil boring logs, monitoring well logs, well construction diagrams, well development logs, and well sampling logs;
- Photographs; and
- A Summary and Conclusions section, including recommendations for any additional investigation or remediation work, if warranted.

This Characterization Report will be submitted to the NYSDEC at least one week prior to conducting any proposed investigation or remediation activities.

4.2 Soil Removal Summary Report

If soil removal is required based on the results of the Site Investigation, a Soil Removal Summary Report (Report) describing the remediation actions implemented will be submitted following the completion of the work described in Section 3.0 of this Work Plan. This Report will be prepared in accordance with provisions set forth in DER-10.

This Report will include, but will not be limited to, the components described below:

- Technical overview and details on the remediation work performed;
- A description of the physical characteristics of the Site, including a physical summary of the fill, soil, and bedrock conditions encountered during the remediation activities listed in this Work Plan;
- Appropriate figures including a project locus map, site plan depicting Site features, and sample location maps
- Data tables including: a table(s) providing specifics on each confirmatory soil sample tested (e.g., sample designation, location, date, depth interval, test parameters, summary tables comparing detected constituents to appropriate regulatory criteria; and tables for other various remediation-related data or information);
- Analytical laboratory reports;
- Photographs;
- A copy of the soil and IDW disposal documentation; and
- A Summary and Conclusions section, including recommendations for additional work, if warranted.

5.0 SCHEDULE

The investigation activities listed in Section 2.0 of this Work Plan will be implemented following approval of this Work Plan by the NYSDEC. Also, prior notice will be provided to the NYSDEC approximately one week before initiating the investigation and any soil removal activities described in this Work Plan. The anticipated timeframe to implement tasks outlined in this Work Plan is summarized below, beginning with regulatory approval of the Work Plan.

- Sections 2.1 and 2.2: Monitoring Well Installation and Development: Approximately two to three weeks (10 – 15 business days)

- Section 2.3: Groundwater Sampling: Approximately 2.4 weeks (12 business days). This timeframe includes two weeks between completion of the well development activities and collection of groundwater samples from the subject wells as recommended in DER-10.

- Section 2.4: Soil Characterization: Approximately two business days. This work will be conducted concurrently with the monitoring well installation and development activities.

- Groundwater Investigation and Soil Characterization Report: Approximately seven weeks (35 business days) from regulatory approval of this Work Plan.

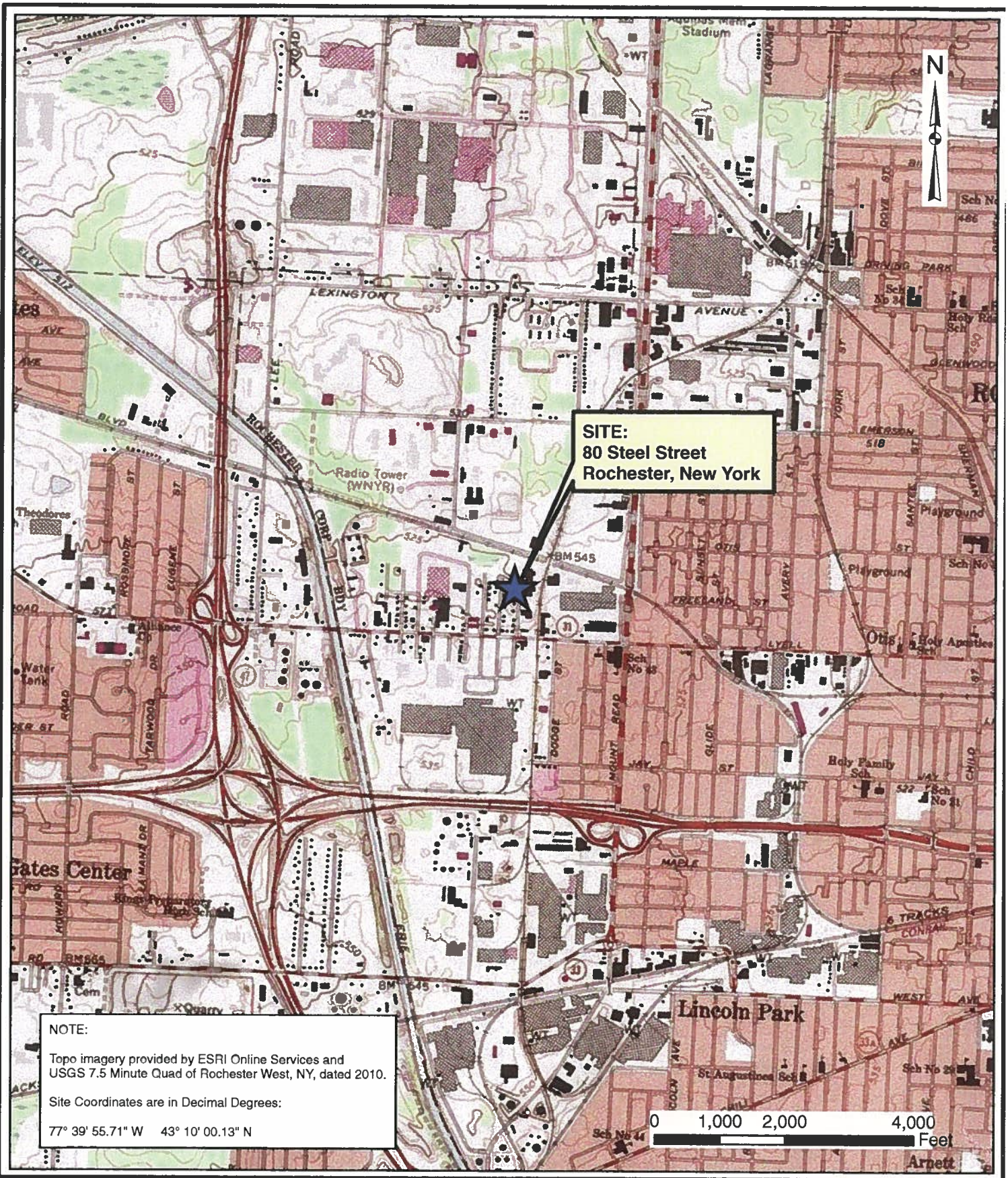
- Section 3.0: Soil Removal and Restoration (if required based on the results of the Site Investigation): Approximately three weeks (15 business days) from an agreement between Genesee Scrap and NYSDEC, or receipt of written notice from the NYSDEC, specifying the area(s) of soil to be excavated.

- Soil Removal Summary Report: This Report is scheduled to be submitted to the NYSDEC approximately four weeks (20 business days) following completion of any soil removal and restoration activities listed above.

FIGURES

Document Path: E:\GIS\Aerial Locus Maps\4482I-10\Aldi\-Locus1.mxd

Last Date Saved: 24 May 2011



Date: 05-18-2011	**DAY ENVIRONMENTAL, INC.** Environmental Consultants Rochester, New York 14614-1008 New York, New York 10016-0710	Project Title: 80 STEEL STREET GENESEE SCRAP & TIN BALING CO., INC. ROCHESTER, NEW YORK INVESTIGATION / REMEDIAL WORK PLAN	Project No.: 4482I-10 FIGURE 1
Drawn By: RJM		Drawing Title: Project Locus Map	
Scale: AS NOTED			

LEGEND

- RAILROAD TRACK
- ⊕B-1/TW — APPROXIMATE LOCATION OF SOIL BORING/TEMPORARY WELL INSTALLED BY PLUMLEY ENGINEERING IN MARCH 2011
- △SS-2 — APPROXIMATE LOCATION OF SURFACE SOIL SAMPLE COLLECTED BY PLUMLEY ENGINEERING IN MARCH 2011
- ◉MW-2 — PROPOSED MONITORING WELL LOCATION

LOMBARD STREET
BICKFORD STREET
STEEL STREET
NEW YORK CENTRAL RAILROAD
ALL INCOMING SCRAP MATERIALS
Fence/Property Line
Gate
Slope
Asphalt Drive
Wall/Property Line
Gate (Closed)
Approximate Right-Of-Way Line
SEE FIGURE 4 FOR SOIL SAMPLING LOCATIONS
△SS-2
CB
Concrete Pad
MW-1 ◉ ⊕B-1/TW
AUTOMOBILE AND APPLIANCE STORAGE AREA
FORMER MOTOR BLOCK AREA
FORMER 3,000 GALLON GASOLINE UNDERGROUND STORAGE TANK (REMOVED 1992)
MAINTENANCE BLDG.
1 Sty Metal
◉MW-2
Scale Office
1 Story Bldg
Scale
Scale Bldg.
Conc. Wall
STORAGE AREA (SHEARING)
LOADING AREA
Crusher Run
Block Bldg.
PROCESSED MATERIAL
Roof Overhang
Shear Pad
Shear Bldg
Conveyor
Concrete Pad
GENESEE SCRAP & TIN BALING CO., INC BUILDING No. 1
1 Story Metal Building
2 Sty. Metal Building
Loading Dock
1 Sty CMU
STORAGE AREA
COMPACTED CRUSHER RUN ROADWAY TO BE ASPHALT DRIVE
BALING SHIPPING AREA
BALING STORAGE AREA
B-13/TW ⊕
MW-3 ◉
SEE FIGURE 3 FOR SOIL SAMPLING LOCATIONS
FORMER METAL PUNCHING AREA
CONCRETE PAD
STORM WATER RETENTION POND (NO OUTLET)
Railroad Embankment

N

SITE PLAN
1" = 80'

0' 80' 160' 240'

FIELD VERIFIED BY	ADL
DATE	05-2011
DRAWN BY	RJM
DATE DRAWN	05-18-2011
SCALE	1" = 80'
DATE ISSUED	06-01-2011

day
DAY ENVIRONMENTAL, INC.
ENVIRONMENTAL CONSULTANTS
ROCHESTER, NEW YORK 14614-1008
NEW YORK, NEW YORK 10016-0710

PROJECT TITLE
80 STEEL STREET
GENESEE SCRAP & TIN BALING CO., INC.
ROCHESTER, NEW YORK

DRAWING TITLE
INVESTIGATION / REMEDIAL WORK PLAN
Site Plan With Proposed Monitoring Well Locations

PROJECT NO.
4482I-10

FIGURE 2

Ref1:
Ref2:
Ref3:

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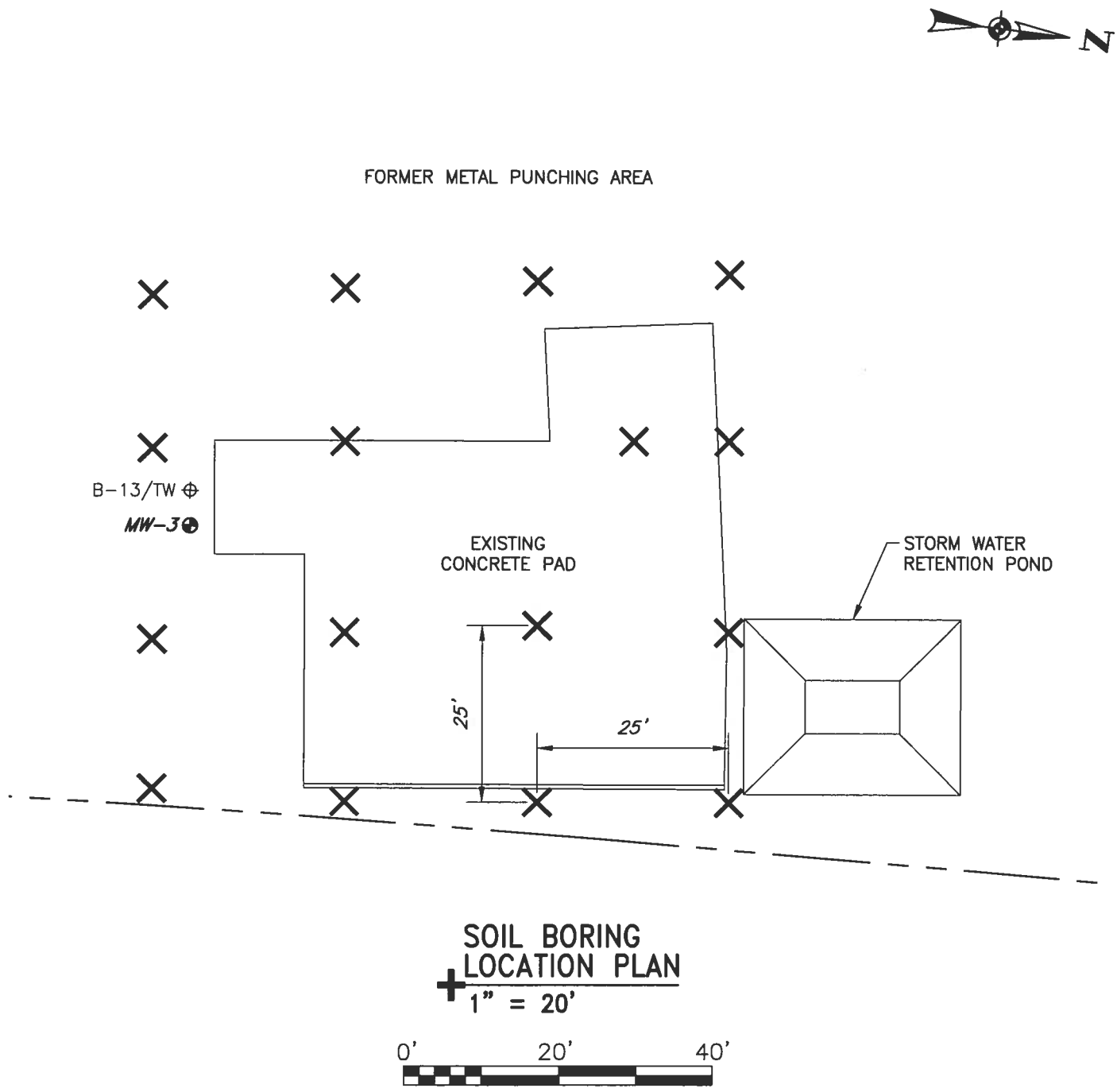


SOIL BORING LOCATION PLAN

1" = 20'

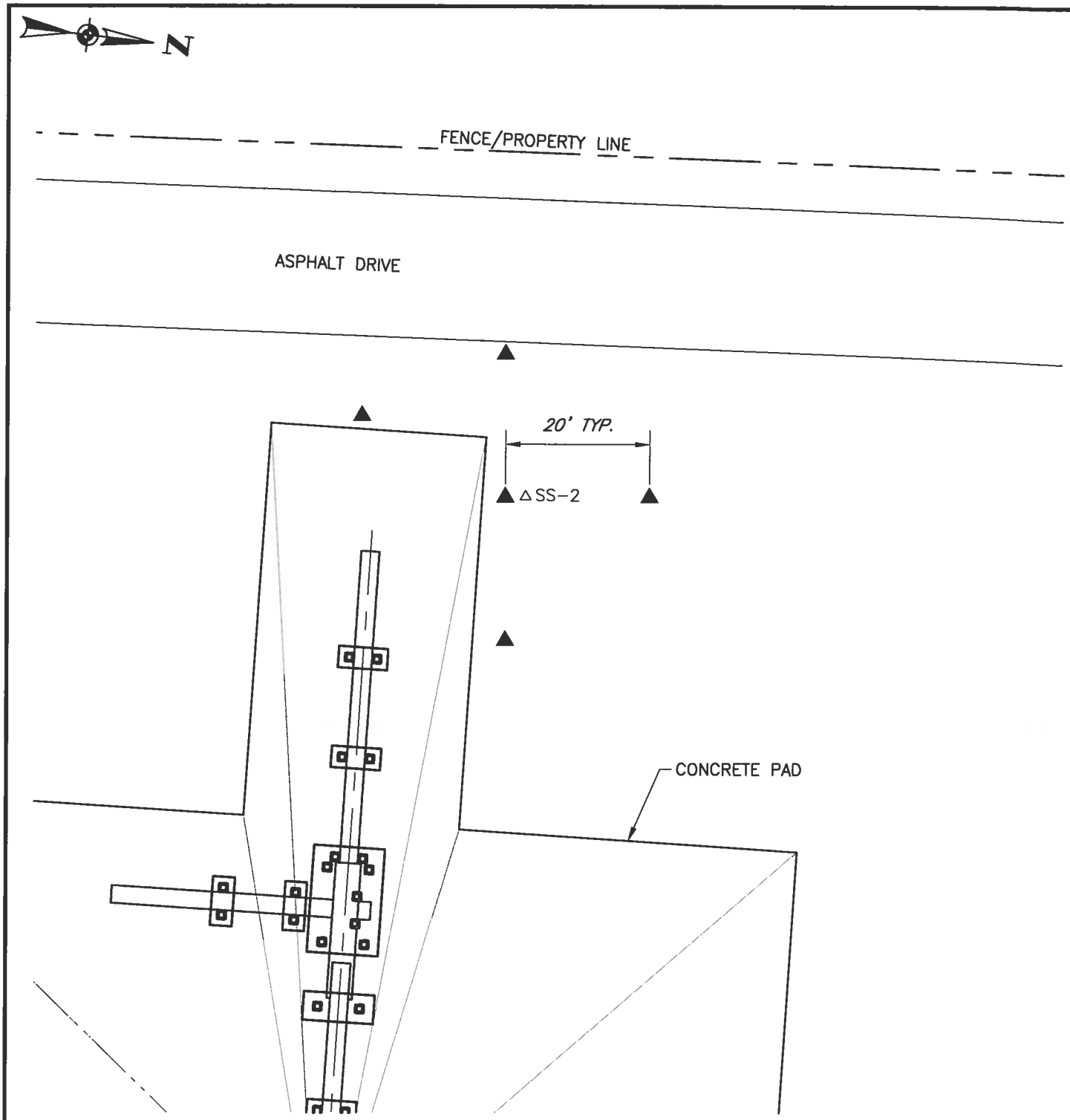
0' 20' 40'

LEGEND:

X	Proposed Soil Boring Location
B-13/TW	Approximate Location Of Soil Boring/Temporary Well Installed By Plumley Engineering In March 2011
MW-3	Proposed Monitoring Well Location

DATE: 06-01-2011 DRAWN BY: RJM/TW SCALE: 1"=20'	day DAY ENVIRONMENTAL, INC. ENVIRONMENTAL CONSULTANTS ROCHESTER, NEW YORK 14614-1008 NEW YORK, NEW YORK 10016-0710	PROJECT TITLE 80 STEEL STREET GENESEE SCRAP & TIN BALING CO., INC. ROCHESTER, NEW YORK INVESTIGATION / REMEDIAL WORK PLAN DRAWING TITLE Proposed Soil Boring Sample Locations	PROJECT NO. 4482I-10 FIGURE 3

Ref1: 80SteelStBase.dwg Ref2: Ref3: Layout: Layout1 Pen Setting File: 800psFullcolor.ctb
Time Plotted: Wednesday, June 01, 2011 9:19:44 AM File Name: P:\Drawings\Atkin\4482I-10\Sampling Plan.dwg



LEGEND:

▲ Proposed Surface Soil Sample Location

△SS-2 Approximate Location Of Surface Soil Sample Collected By Plumley Engineering In March 2011

SOIL BORING LOCATION PLAN

1" = 20'

0' 20' 40'

DATE: 06-01-2011 DRAWN BY: RJM SCALE: 1"=20'	**day** DAY ENVIRONMENTAL, INC. ENVIRONMENTAL CONSULTANTS ROCHESTER, NEW YORK 14614-1008 NEW YORK, NEW YORK 10016-0710	PROJECT TITLE 80 STEEL STREET GENESEE SCRAP & TIN BALING CO., INC. ROCHESTER, NEW YORK INVESTIGATION / REMEDIAL WORK PLAN DRAWING TITLE Proposed Surface Soil Sample Locations	PROJECT NO. 4482I-10 FIGURE 4

Ref1: 80SteelStBase.dwg Ref2: Ref3: Layout: Layout2 Pen Setting File: 800psFullcolor.ctb
Time Plotted: Wednesday, June 01, 2011 11:50:54 AM File Name: P:\Drawings\Atkin\4482I-10\Sampling Plan.dwg

TABLE

Table 1
Analytical Sampling Summary

Task Name	Sampling Parameter	Number of Samples	Matrix
Section 2.3 Groundwater Sampling			
	STARS/TCL VOCs	**3**	**Water**
	STARS SVOCs	**3**	**Water**
Section 2.4 Soil Characterization			
	STARS/VOCs (Soil borings)	**16**	**Soil**
	STARS/TCL VOCs (Soil borings)	**2**	**QA/QC (Dup.)**
	PCBs (surface soil)	**5**	**Soil**
Waste Characterization			
	TCLP VOCs	**3**	**Soil**
	TCLP SVOCs	**3**	**Soil**
	RCRA Metals	**3**	**Soil**
	PCBs	**3**	**Soil**
	Ignitability & Corrosivity	**3**	**Soil**
	TCL VOCs	**1**	**Water**
	RCRA Metals	**1**	**Water**
Section 3.0 Confirmatory Sampling (if required)*			

* - To be determined following the soil characterization activities listed in the Work Plan.