WORK PLAN

Debris Pile Management
80 Steel Street
Rochester, New York

Ben Weitsman of Rochester, LLC and
Weitsman Rochester Realty, LLC

October 2013

O'BRIEN & GERE

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LIST OF ACRONYMS/ABBREVIATIONS

ASTM	American Society for Testing and Materials
bgs	below ground surface
CFR	Code of Federal Regulations
CY	Cubic yards
DOT	Department of Transportation
ELAP	Environmental Laboratory Accreditation Program
ft	foot or feet
JSA	Job Safety Analysis
GPS	Global Positioning System
HASP	Health and Safety Plan
IDW	investigation-derived waste
mg/kg	milligram per kilogram
mg/L	milligrams per liter
NYS	New York State
NYSDEC	New York State Department of Environmental Conservation
NYSDOH	New York State Department of Health
OSHA	Occupational Safety and Health Administration
Part 376	New York State Codes, Rules and Regulations; Title 6, Chapter IV, Subpart 376
PCB	polychlorinated biphenyl
PID	photoionization detector
ppm	parts per million
PPE	personal protective equipment
QA/QC	Quality Assurance/Quality Control
Site	80 Steel Street, Rochester, New York
TCLP	Toxicity Characteristic Leaching Procedure
TSCA	Toxic Substances Control Act
U.S.	United States
USCS	Unified Soil Classification System
USEPA	United States Environmental Protection Agency

1. INTRODUCTION

O'Brien & Gere has developed this *Debris Pile Management Work Plan* (Work Plan) on behalf of Ben Weitsman of Rochester, LLC and Weitsman Rochester Realty, LLC (Weitsman). The purpose of the Work Plan is to document the procedures for loading, transporting, and disposing of the piles of staged debris at 80 Steel Street (Site), located in the City of Rochester, New York. The piles of staged debris visually consist of a non-homogeneous mixture of soil, metal, electronics, cylinders, concrete, debris, and automotive parts (Debris Pile(s)). Recent sampling of the Debris Piles has included three sample locations which exhibited total polychlorinated byphenol (PCB) concentrations exceeding 48 milligrams/kilogram (mg/kg), or parts per million (ppm), and 68 sample locations which exhibited total PCB concentrations less than 48 ppm.

The work described in this Work Plan is designed to manage the staged Debris Piles for off-Site disposal based on total PCB concentration. The Work Plan has been prepared consistent with the requirements of the following applicable sections of Title 40 of the Code of Federal Regulations, Subpart 761 PCB Remediation Waste (40CFR 761.61):

- 40 CFR 761.62 – Characterization Sampling
- 40 CFR 761.61(a)(5)(i)(B)(2)(ii) and 40 CFR 761.61(a)(5)(v)(A)-disposal of Bulk PCB Remediation Waste less than or equal to 50 ppm
- 40 CFR 761.61(a)(5)(i)(B)(2)(iii) and (iv)-disposal of Bulk PCB Remediation Waste greater than or equal to 50 ppm
- 40 CFR 761.79(c)(2)–decontamination of movable equipment utilizing double wash-rinse, confirm wipe program
- 40 CFR 761.61(a)(5)(v)(A)-disposal of personal protective equipment and non liquid cleaning materials.

The Work Plan also presents the approach to handle and resize debris and metal to meet the maximum dimensional specifications as required by the disposal facilities. In addition, a description of the activities to address the approximate 150 gas cylinders is included in the Work Plan.

2. SITE HISTORY AND DESCRIPTION

2.1 SITE LOCATION

The Site is located at 80 Steel Street in the City of Rochester, Monroe County, New York. A Site Location map is provided as **Figure 1**. The Debris Piles are situated on the eastern side of the Site as shown on **Figure 2.**

2.2 SITE HISTORY

Weitsman purchased the Site and its scrap metal operations in August 2011. The Debris Piles were present when Weitsman purchased the Site.

During a routine site walkover by the NYSDEC in the summer of 2012, the NYSDEC inquired of Weitsman as to the Debris Piles. As a result and in direct consultation with the NYSDEC, Weitsman subsequently performed four rounds of characterization sampling on August 9, 2012; October 11, 2012; November 19, 2012; and June 17 to June 19, 2013. The NYSDEC assisted Weitsman personnel during the sample collection activities performed on October 11, 2012 and November 19, 2012 and has reviewed each of the first three rounds of sampling results submitted to them by Weitsman. The results of the fourth round of characterization sampling are currently being reviewed by the NYSDEC.

2.3 CURRENT SITE CONDITIONS AND USE

The Site is an active vehicle dismantling, scrap metal processing and recycling facility owned and operated by Weitsman. A variety of scrap metal is brought to the facility for recycling including ferrous and non-ferrous metals.

The Site is bordered by 80 Steel Street to the west, Oxford Street and a bus garage to the west-northwest, Ferrano Street to the north, railroad tracks to the east, and a commercial business to the south on Lyell Avenue. The Site is relatively flat in topography, is largely dirt/gravel/pavement covered, and improved with two buildings. The weight scale and office are situated on Steel Street where customers bring scrap metal into the facility and then drive to various locations on the Site to unload based upon the type of scrap being delivered.

2.4 PREVIOUS SITE INVESTIGATIONS

The five staged Debris Piles, or Areas of Concern (AOC), were previously designated into five separate quadrants by Weitsman and the NYSDEC. AOCs 1 through 5, associated sample locations and laboratory analytical results from the previous four sampling events completed by Weitsman are shown on **Figure 2**. A discussion of the previous AOC sampling events completed since Weitsman took ownership of the Site is provided below.

2.4.1 Debris Pile Characterization

A total of 71 PCB and 12 Toxicity Characteristic Leaching Procedure (TCLP) lead samples of the AOCs have now been collected and analyzed as discussed below.

At the request of NYSDEC, on August 9, 2012, two soil samples (South Pile and North Pile) were collected from the AOCs and submitted for PCB analysis and TCLP lead analysis using USEPA SW-846 methods. The results indicate total PCB concentrations detected at the two locations were both below 50 ppm, at 22.6 and 18.8 ppm, respectively. The results for the TCLP lead analyses were below the regulatory limit of 5 mg/L. Sample location sketches provided with the results indicate that the samples were composited from multiple points within the Debris Pile.

On October 11, 2012, Mr. John Thompson of the NYSDEC assisted Weitsman in the collection of five soil samples (No. 1 N.W. Area, No. 2 N.E. Area, No. 3 East N.E. Area, No. 4 South East and No. 5 South West Middle). The samples were submitted to an analytical laboratory for PCB analysis and TCLP lead analysis. The results indicate total PCB concentrations detected were below 50 ppm, with concentrations of PCBs ranging from 21.74 to 34.78 ppm. The results for the TCLP lead analysis were again below the regulatory limit of 5 mg/L.

The third sampling event occurred on November 19, 2012. Mr. Thompson again assisted Weitsman in the collection of 25 soil samples from test pits advanced within the AOCs at locations selected by Mr. Thompson. The

samples were subsequently analyzed for PCBs. In addition, five of these soil samples were submitted for TCLP lead analysis. The results showed that PCB concentrations were above 50 ppm in three samples - sample identifications Quadrant 1-2 (54.8 ppm), Quadrant 1-3 (76.2 ppm), and Quadrant 3-2 (112.7 ppm). Samples from the eastern portion of AOC 2, the southern portion of AOC 3, AOC 4 and AOC 5 did not contain PCB concentrations in excess of 50 ppm. The results for each TCLP lead sample were again below the regulatory limit of 5mg/L. The samples were shown on a sketch prepared by Mr. Thompson indicating that grab samples were collected at various locations across the piles of staged soil, debris and metal.

The final characterization event was conducted from June 17 through June 19, 2013 by O'Brien & Gere, in accordance with the modified *Debris Pile Characterization Work Plan*, prepared and revised by O'Brien & Gere, and conditionally approved by the NYSDEC on May 20, 2013. The results of the final characterization event was summarized in the *Debris Pile Characterization Report*, prepared by O'Brien & Gere and submitted to the NYSDEC on August, 28, 2013.

2.4.2 Debris Pile Disposal Volumes

Based upon a topographic survey and volume calculation completed by Fisher Associates on February 6, 2013, the total volume of the AOCs is approximately 4,550 cubic yards. Of this, the following summarizes total PCB concentrations and approximate volumes:

- Total PCBs >48 ppm, estimated volume of 94 cubic yards
- Total PCBs 25-48 ppm, estimated volume of 890 cubic yards
- Total PCBs < 25 ppm, estimated volume of 3,566 cubic yards

A breakdown of this summation by AOC is presented below.

- The estimated volume of AOC 1 is 1,030 cubic yards. Of this, the following summarizes total PCBs and approximate volumes:
  - Total PCBs >48 ppm, estimated volume of 64 cubic yards
  - Total PCBs 25-48 ppm, estimated volume of 707 cubic yards
  - Total PCBs < 25 ppm, estimated volume of 259 cubic yards
- The estimated volume of AOC 2 is 750 cubic yards. Of this, the following summarizes total PCBs and approximate volumes:
  - Total PCBs >48 ppm, estimated volume of 0 cubic yards
  - Total PCBs 25-48 ppm, estimated volume of 183 cubic yards
  - Total PCBs < 25 ppm, estimated volume of 567 cubic yards
- The estimated volume of AOC 3 is 445 cubic yards. Of this, the following summarizes total PCBs and approximate volumes:
  - Total PCBs >48 ppm, estimated volume of 30 cubic yards
  - Total PCBs 25-48 ppm, estimated volume of 0 cubic yards
  - Total PCBs < 25 ppm, estimated volume of 415 cubic yards
- The estimated volume of AOC 4 is 1,570 cubic yards. Of this, the following summarizes total PCBs and approximate volumes:
  - Total PCBs >48 ppm, estimated volume of 0 cubic yards
  - Total PCBs 25-48 ppm, estimated volume of 0 cubic yards
  - Total PCBs < 25 ppm, estimated volume of 1,570 cubic yards

- The estimated volume of AOC 5 is 755 cubic yards. Of this, the following summarizes total PCBs and approximate volumes:
  - Total PCBs >48 ppm, estimated volume of 0 cubic yards
  - Total PCBs 25-48 ppm, estimated volume of 0 cubic yards
  - Total PCBs < 25 ppm, estimated volume of 755 cubic yards.

Additional information regarding disposal information by AOC and sample location, including respective PCB concentrations, representative volumes, and observed percentages of metal/debris, is summarized on **Table 1.**

3. SCOPE OF WORK

Presented within this section are the following primary components of the activities to be completed:

- Health and safety requirements
- Quality assurance/quality control protocols
- Disposal facility requirements
- Site preparation
- Loading, transportation and off-Site disposal field activities
- Metal/debris handling and resizing procedures
- Decontamination procedures
- Confirmatory wipe sampling procedures
- Management of ancillary wastes.

3.1 HEALTH AND SAFETY MONITORING

A JSA had previously been prepared for the activities associated with the AOCs. As part of this Work Plan, the existing JSA will be updated for the activities described in this Work Plan. The JSA was prepared in accordance with applicable general industry and construction standards of the Federal Occupational Safety and Health Administration (OSHA) and United States (U.S.) Department of Labor (DOL). The JSA will be followed by O'Brien & Gere personnel involved in the work.

Work associated with the loading of the AOCs for transportation off-Site and conducting decontamination activities will be conducted by OSHA Hazwoper trained operators and laborers for those AOC areas exhibiting total PCB concentrations greater than 48 ppm.

As required by the JSA, particulate air monitoring will be conducted during implementation of the Work Plan and the monitor instrument readings will be recorded in O'Brien & Gere's dedicated field book. As a means for controlling dust at the Site, and to prevent dust particles from becoming air-borne, a water truck or other water supply source will be used to wet the AOCs as necessary should air-borne dust be encountered. Water will be applied to sufficiently eliminate air-borne dust.

3.2 QUALITY ASSURANCE/QUALITY CONTROL PROTOCOLS

O'Brien & Gere will have a full time representative on-site during the construction activities to manage and document the work being performed**.**

Prior to starting work, the AOC sample locations will be demarcated utilizing stakes, flagging and marking paint to delineate the soil, debris and metal (based upon one of three levels of total PCBs for disposal) as necessary.

The appropriate chain of custody protocols for collection of the confirmatory wipe PCB samples will be complied with, a prequalified New York State Department of Health (NYSDOH) Environmental Laboratory Analytical Program (ELAP)-certified laboratory will perform analysis of samples, and the laboratory will provide a standard report package.

3.3 DISPOSAL FACILITY REQUIREMENTS AND APPROVAL

The five AOCs' soil, debris and metal will be loaded for off-Site disposal based on three levels of total PCB concentration: Those portions exceeding 48 ppm, those portions with concentrations exceeding 25 ppm but less than 48 ppm, and those portions with concentrations below 25 ppm.

Soil, debris and metal exhibiting total concentrations of PCBs greater than 48 ppm will be loaded and transported to Chemical Waste Management's Model City Landfill (Model City), located in Lewiston, NY, or other permitted facility . The soil, debris and metal will be placed as direct fill at the facility and the soil, debris and

metal will need to be sized to a maximum dimension of 6 inch minus prior to loading for transportation, as required by the disposal facility.

Soil, debris and metal exhibiting total concentrations of PCBS greater than 25 but less than 48 ppm will be loaded and transported to Waste Management's Mill Seat Landfill (Mill Seat), located in Bergen, NY, or other permitted facility . The material will be placed as direct fill at the facility. The disposal facility requires that there be no more than 20% of debris and metal with the soil but there is no restriction on the maximum size requirement of the soil, debris and metal.

Soil, debris and metal exhibiting total concentrations of PCBs less than 25 ppm will be loaded and transported to Mill Seat, or other permitted facility. The material will be used as daily cover at the landfill. The disposal facility requires that there be no more than 20% of debris and metal with the soil and all soil, debris and metal will need to be sized to a maximum dimension of 2 feet by 2 feet minus prior to loading for transportation.

Generator Waste Profiles will be completed for each waste stream and submitted for review and approval by Chemical Waste Management and Waste Management, or other permitted facilities. Weitsman's United States Environmental Protection Agency (USEPA) Hazardous Waste Generator Identification Number will be required for soil, debris and metal transported and disposed of at Model City. In addition to the Generator Waste Profiles, NYSDEC approval of this Work Plan constitutes approval to dispose of the soil, debris and metal as required by Chemical Waste Management and Waste Management.

All trucking would be provided by Chemical Waste Management and Waste Management, or other permitted haulers.

3.4 SITE PREPARATION

A decontamination pad will be constructed in the staging area south of AOC 1 near the water source and will be constructed of timbers and poly sheeting.

As shown on **Figure 2**, trucks will be directed to first drive north through the facility and around the north end of buildings towards the eastern side of the Site where work is taking place. The existing road running north-south through the work area would be closed off and access only allowed to the trucks hauling soil, debris and metal. The trucks would enter the north end of the access road, stay on the road, pull up adjacent to the debris pile being loaded, and once loaded, drive out from the southern end of the access road, exiting the facility just south of the scale house onto Steel Street.

3.5 LOADING, TRANSPORTATION AND OFF-SITE DISPOSAL

3.5.1 Proposed Loading Sequence

To prevent co-mingling and cross contamination, the AOC sample locations exhibiting PCBs greater than 48 ppm would first be loaded and transported off-Site to Model City, or other permitted facility. These four sample locations include three locations from AOC 1: 1- 1-08-061713_06, 1-17-061813_5, and Quadrant 1-3; and one location from AOC 3: Quadrant 3-2. Based upon visual observations, there is little debris or metal greater than 6 inches in dimension at these locations. If debris or metal greater than 6 inches is encountered, the debris or metal would be resized in accordance with Section 3.5.2 and loaded out with the soil. The equipment utilized to load and resize the soil, debris or metal would be decontaminated utilizing the procedures identified in Section 3.6 and confirmatory wipe samples collected in accordance with Section 3.7.

Space in the work area is limited. To maximize work area, it is proposed that AOC 5 next be loaded and transported off-Site to Mill Seat, or other permitted facility. The soil, debris and metal in AOC 5 exhibits total PCB concentrations less than 25 ppm. Based upon visual observations, there is no debris or metal greater than 2 feet in dimension at this AOC. If debris or metal greater than 2 feet is encountered, the debris or metal may be resized and loaded out with the soil, or directly loaded, in accordance with Section 3.5.2. The equipment utilized to load and resize the soil, debris or metal would not be decontaminated due to work proceeding next to AOC 4, which also exhibits total PCB concentrations less than 25 ppm.

Work would next proceed to AOC 4, and it is anticipated that work would proceed from the northern end of the AOC in the southerly direction. All of the soil, debris and metal in AOC 4 exhibits total PCB concentrations less than 25 ppm and would be loaded and transported off-Site to Mill Seat, or other permitted facility. Based upon visual observations, there is debris and metal greater than 2 feet in dimension at this AOC. As it is encountered, the debris or metal may be resized and loaded out with the soil, or directly loaded, in accordance with Section 3.5.2. The equipment utilized to load and resize the soil, debris or metal would not be decontaminated due to work proceeding next to AOC 3, of which the remaining portions exhibit total PCB concentrations less than 25 ppm.

Work at AOC 3 would proceed in the same manner as described in the preceding paragraph for AOC 4, and then would be halted when work began to encroach upon the area containing the gas cylinders as shown in **Figure 2**.

Work at AOCs 1 and 2 would proceed and be coordinated in the field based upon managing areas exhibiting two different total PCB concentrations (those areas below 25 ppm and those above 25 ppm), maximum dimension of debris and metal that is encountered, the staged piles of soil, debris and metal from the characterization sampling conducted in June 2013, and working in the vicinity of the gas cylinders. Based upon visual observations, there is debris or metal greater than 2 feet in dimension at both of these AOCs. As it is encountered, the debris or metal may be resized and loaded out with the soil, or directly loaded, in accordance with Section 3.5.2. The equipment utilized to load and resize the soil, debris or metal would be decontaminated utilizing the procedures identified in Section 3.6 and confirmatory wipe samples collected in accordance with Section 3.7, if working from areas greater than 25 ppm to those less than 25 ppm to prevent cross-contamination. The intent shall be to first dispose of those locations exhibiting less than 25 ppm in order to minimize decontamination and confirmatory wipe sampling activities.

3.5.2 Metal/Debris Resizing

If required, metal/debris may be resized prior to transportation and disposal. Resizing of metal/debris will be conducted using a mobile shear or torch.

3.5.3 Documentation and Transportation to Landfills

Following receipt of landfill approval, loads transported to Model City would be accompanied by a Hazardous Waste Manifest signed by Weitsman. The load would be weighed at the landfill, and a copy of the weight ticket and landfill-signed Hazardous Waste Manifest provided to Weitsman and the NYSDEC by the landfill.

Following receipt of landfill approval, loads transported to Mill Seat would be accompanied by a Non-Hazardous Bill of Lading signed by Weitsman. The load would be weighed at the landfill, and a copy of the weight ticket and landfill-signed Bill of Lading provided to Weitsman and the NYSDEC by the landfill.

The landfill documentation will be included as an Exhibit of the Construction Report as described in Section 5.

3.6 DECONTAMINATION PROCEDURES

The method of decontaminating the equipment buckets, grapple or resizing equipment between use at locations of higher total PCB concentrations to those of lower total PCBs, as well as upon project completion, would be as follows: The bucket or grapple or other equipment would be decontaminated between wastestream locations first using potable water and a high pressure steam cleaner. Decontamination fluids would be discharged onto the AOC in close proximity to its respective location of similar PCB concentration. The equipment bucket would undergo a final decontamination/confirmation procedure using an acetone double wash/rinse as defined in subpart S of 40 CFR 761, followed by the collection of one wipe sample to be submitted for laboratory analysis of PCBs. The final decontamination would be conducted over a decontamination pad constructed of poly and timbers. After confirmation from the laboratory that the bucket is clean, the equipment would be released to work on those locations exhibiting lower PCBs. This procedure would also be utilized upon project completion to permit return of the equipment back to Weitsman for use elsewhere on Site. Spent decontamination fluids and used poly and timbers would be staged and properly labeled. The spent solvent and used poly and timbers would be transported and disposed at a permitted facility.

3.7 CONFIRMATORY WIPE SAMPLES

Following the acetone double wash/rinse final decontamination procedure of the equipment bucket, grapple, or resizing equipment, O'Brien & Gere would collect a confirmatory wipe sample from each piece of equipment. A 10 centimeter by 10 centimeter dedicated cardboard template would first be placed on the inside of the bucket or grapple "finger". The laboratory provided wipe will then be vigorously scrubbed across the area in both the horizontal and vertical directions. The wipe will then be placed back into its sample jar and transported to the laboratory for analysis.

No trip blanks or QA/QC samples will be collected. Samples collected will be analyzed using USEPA SW-846 methods for PCBs. The laboratory analysis will be completed by Paradigm Environmental Services, Inc. (Paradigm) located in Rochester, NY, with an expedited turnaround time of 24 hours. Paradigm's ELAP number is 10958.

The laboratory will provide a standard report package. In addition the laboratory will provide the data in electronic format for incorporation into a database, which will be used to generate tables and figures for the Construction Report. The analytical results will be included as an Exhibit of the Construction Report.

3.8 MANAGEMENT OF GAS CYLINDERS

During the June 2013 characterization sampling event, approximately 150 compressed gas cylinders of unknown condition and content were found by O'Brien & Gere's operator on AOCs 2 and 3, as shown on **Figure 2**. The gas cylinders were not disturbed. Following removal of the AOCs which will enable their accessibility, a specialized contractor will manage the gas cylinders to prepare them for transportation and disposal. It is anticipated these items will be disposed of under a separate waste profile to Mill Seat, including the residual soil, debris and metal present, as the PCB concentrations in these areas of AOCs 2 and 3 ranged from 4.84 to 16.61 ppm.

3.9 MANAGEMENT OF ANCILLARY WASTES

3.9.1 General

The AOC management activities are anticipated to generate ancillary waste which will require appropriate management in accordance with state and federal regulations (Title 40 of the Code of Federal Regulations [CFR] Parts 239 through 279 and Title 6 of New York Codes, Rules and Regulations [6 NYCRR] Chapter IV, Subchapter B Parts 360 through 376). The anticipated ancillary wastes include the following:

- Decontamination fluids and decontamination pad construction materials resulting from decontamination of equipment
- Poly sheeting from the previously stockpiled and staged soil, debris and metal resulting from the June 2013 characterization event
- Used personal protective equipment (PPE) resulting from the execution of field activities
- General refuse.

The management of these wastes is discussed below.

3.9.2 Decontamination Fluids and Pad Materials

Currently, there is one 55-gallon drum of decontamination pad construction materials and one, partially filled 55-gallon drum of decontamination fluids staged at the Site from the characterization event conducted in June.

The existing drum of decontamination pad materials will be emptied of the poly and timbers and these materials will be disposed of with the AOC materials.

The decontamination fluids used during the management activities would be added to the existing 55-gallon drum containing decontamination fluids.

The new decontamination pad construction materials (timber and poly sheeting) will be placed in a 55-gallon drum after receipt of PCB wipe sample confirmation that the equipment can be returned back to Weitsman.

At the end of the construction activities, these drums will be transported and most likely disposed of at Model City.

3.9.3 Poly Sheeting

The existing poly sheeting on which AOC materials were staged during the characterization activities completed in June, and new poly sheeting which may be used during construction, will be disposed of along with their associated AOC materials.

3.9.4 PPE and Associated Materials

Used PPE and other associated debris will be placed in trash bags as appropriate and disposed of with the Site's solid waste (*e.g.*, the Site's dumpster).

3.9.5 General Refuse

General refuse will be placed in trash bags and disposed of in appropriate waste receptacles (*e.g.,* the Site's dumpster).

4. PROJECT PERSONNEL

The personnel for this project are anticipated as follows:

Name and Title	Telephone
NYSDEC Key Personnel	
Michael Khalil, P.E. **Environmental Engineer II** **Region 8** **Avon, New York**	(585) 226-5415
USEPA Key Personnel	
James Haklar **Regional PCB Coordinator / PCB Disposal** **Edison, New Jersey**	(732) 906-6817
O'Brien & Gere Key Personnel	
Paul Mazurkiewicz, P.E. **Project Officer** **Syracuse, New York**	(315) 956-6442
Kevin Ignaszak, P.E. **Project Manager** **Rochester, New York**	(585) 295-7709 (585) 752-6611 (cell)
Jeff Parsons **Corporate Associate for Safety and Health** **Syracuse, New York**	(315) 956-6070 (315) 391-0638 (cell)
Logan Reid **Scientist/Field Team Leader** **Rochester, New York**	(585) 295-7717 (516) 780-1894 (cell)
Subcontractors	
Analytical Laboratory: Paradigm Environmental Services, Inc. **Rochester, New York**	(585) 647-2530
Disposal Facilities	
Hazardous PCBs > 48 ppm: **Chemical Waste Management** **Model City Landfill** **Lewiston, New York** **Non-Hazardous PCBs < 48 ppm** **Waste Management** **Mill Seat Landfill** **Bergen, New York** **Sue Rossi** **Waste Management** **Bergen, New York** **NOTE: Other permitted landfills may be used for disposal.**	(585) 259-9408

Name and Title	Telephone
Loading Equipment/Excavator/Loader to be provided by Weitsman and operated by O'Brien & Gere construction personnel	
Weitsman Key Personnel	
Aaron Weiner **General Manager** **Rochester, New York**	(585) 254-0360

5. REPORT

Following completion of the Scope of Work described in this Work Plan, a Construction Report will be prepared. Specific information to be contained in the Construction Report is as follows:

- Introduction including the purpose and organization of the report
- Site history
- A description of the AOC management and disposal field activities
- Conclusions.

Relevant supporting data including disposal related documentation will be appended to the report and is expected to include: Site Photographs, Generator Waste Profiles, Disposal Facility Approvals, Weight Tickets, Bills of Lading, Hazardous Waste Manifests and the confirmatory wipe sample analytical reports. The Construction Report will be submitted to the NYSDEC for review and approval.

6. SCHEDULE

Following formal approval of the Work Plan by the NYSDEC, it is estimated the field work will take four to six weeks to complete. A decontamination confirmatory wipe sample laboratory turnaround time of 24 hours is proposed from Paradigm. Within four weeks following the completion of field activities, and contingent upon receipt of disposal related documentation from the landfills, O'Brien & Gere anticipates submitting a draft Construction Report for review by the NYSDEC.

Tables

Table 1
Summary of Proposed Disposal Information By Sample Location

Debris Pile Management Work Plan
Ben Weitsman of Rochester, LLC and Weitsman Rochester Realty, LLC
80 Steel Street Rochester, New York 14606

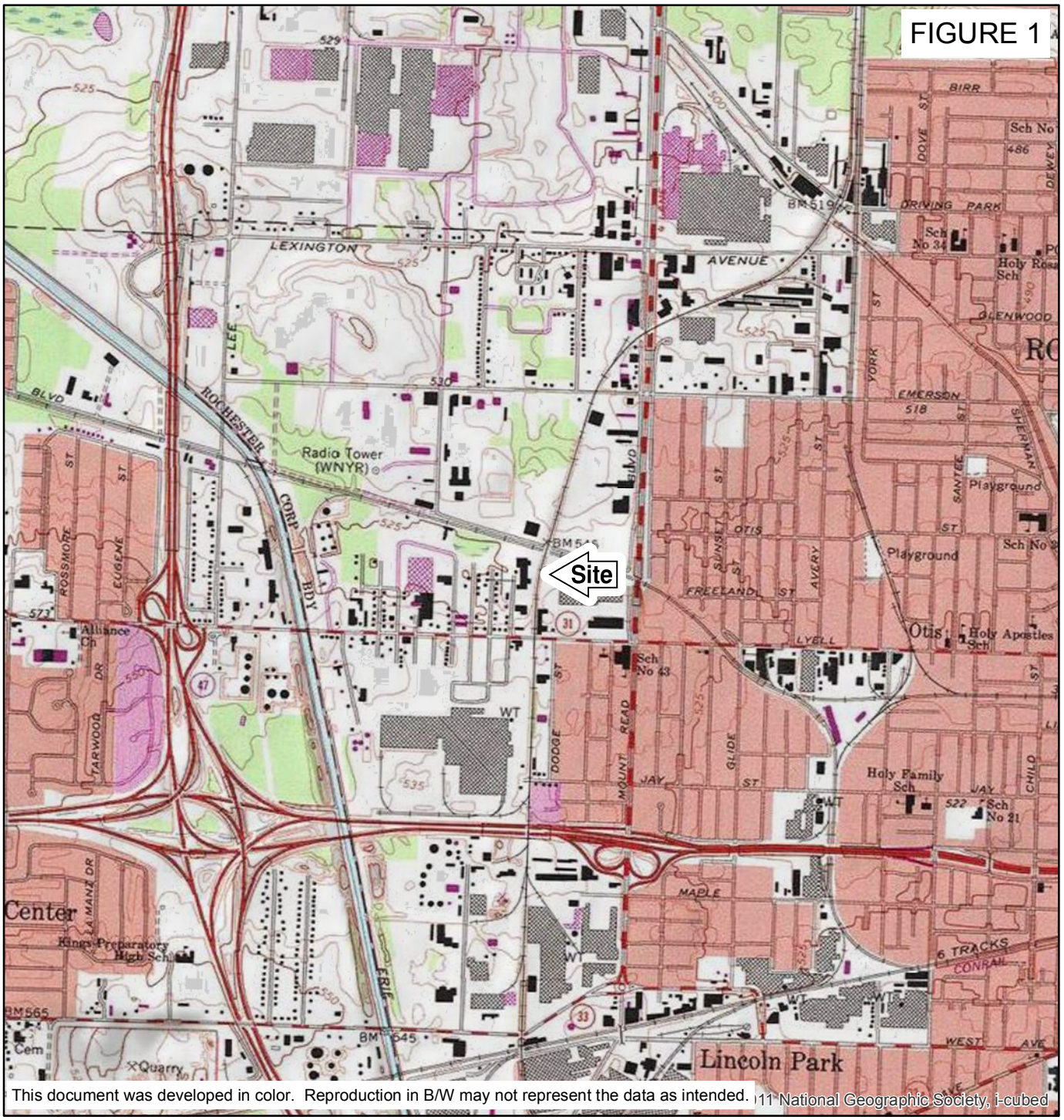
80 Steel Street Rochester,	Area of Concern	Estimated % of Metal/Debris	Total Concentration of PCBs	Estimated Total Volume of Area of Concern (cy)	Estimated Volume of Soil and Debris/Metal (based on average of visual observations) by Total PCB Concentration (cy)
		Based on Visual Observations	mg/kg or ppm		
Qudrant 1-1	1	No Characterization by OBG	16.15	**1,030**	**Total PCBs >48 ppm:** Soil 64 cy, Debris/Metal 10% of this = 7 cy **Total PCBs >25 ppm but < 48 ppm:** Soil 707 cy, Debris/Metal 15% of this = 107 CY **Total PCBs <25 ppm:** Soil 259 cy, Debris/Metal 10% of this = 26 cy
Qudrant 1-2	1	No Characterization by OBG	43.3		
Qudrant 1-3	1	No Characterization by OBG	64.1		
Qudrant 1-4	1	No Characterization by OBG	19.13		
Qudrant 1-5	1	No Characterization by OBG	18.87		
1-06	1	5-10%	26.9		
1-07	1	5-10%	14.32		
1-08	1	5-10%	55		
1-09	1	10%	32.2		
1-10	1	15-20%	29.39		
1-11	1	15%	34.9		
1-12	1	10%	44.6		
1-13	1	10%	42.1		
1-14	1	10%	32.5		
1-15	1	15-20%	6.36		
1-16	1	15-20%	7.61		
1-17	1	5-10%	49.9		
1-18	1	5-10%	25.8		
1-19	1	5-10%	27.4		
1-20	1	5-10%	37.5		
1-21	1	5%	31.4		
1-22	1	5-10%	24.6		
1-23	1	5%	38		
1-24	1	5-10%	40.5		
Qudrant 2-1	2	No Characterization by OBG	13.23	**750**	**Total PCBs >48 ppm:** Soil 0 cy, Debris/Metal 10% of this = 0 cy **Total PCBs >25 ppm but < 48 ppm:** Soil 183 cy, Debris/Metal 11% of this = 20 CY **Total PCBs <25 ppm:** Soil 567 cy, Debris/Metal 8% of this = 45 cy
Quadrant 2-2	2	No Characterization by OBG	16.32		
Quadrant 2-3	2	No Characterization by OBG	16.61		
Quadrant 2-4	2	No Characterization by OBG	14.2		
Quadrant 2-5	2	No Characterization by OBG	13.3		
2-06	2	5-10%	18.67		
2-07	2	5-10%	24.3		
2-08	2	10%	28.3		
2-09	2	5%	25.9		
2-10	2	5%	23.5		
2-11	2	5-10%	30.9		
2-12	2	15%	29.3		
2-13	2	10%	17.76		
2-14	2	5-10%	18.62		
2-15	2	5-10%	26.6		
2-16	2	<5%	15.57		
3-06	3	15-20%	11.92	**445**	**Total PCBs >48 ppm:** Soil 30 cy, Debris/Metal 15% of this = 5 cy **Total PCBs <25 ppm:** Soil 415 cy, Debris/Metal 18% of this = 75 cy
3-07	3	20-30%	24.8		
3-08	3	15-20%	12.17		
3-09	3	5-10%	22.3		
3-10	3	5-10%	13.88		
3-11	3	5-10%	14.01		
3-12	3	20-30%	21.3		
3-13	3	10-15%	18.25		
3-14	3	10-15%	9.79		
Quadrant 3-1	3	No Characterization by OBG	5.4		
Quadrant 3-2	3	No Characterization by OBG	84.6		
Quadrant 3-3	3	No Characterization by OBG	7.63		
Quadrant 3-4	3	No Characterization by OBG	6.18		
Quadrant 3-5	3	No Characterization by OBG	4.84		
Quadrant 4-1	4	No Characterization by OBG	5.71	**1,570**	**Total PCBs <25 ppm:** Soil 1,570 cy, Assume Debris/Metal 10% of this = 157 cy
Quadrant 4-2			4.41		
Quadrant 4-3			4.54		
Quadrant 4-4			9.02		
Quadrant 4-5			5.93		
Quadrant 5-1	5	No Characterization by OBG	8.57	**755**	**Total PCBs <25 ppm:** Soil 755 cy, Assume Debris/Metal 0% of this = 0 cy
Quadrant 5-2			13.79		
Quadrant 5-3			6.34		
Quadrant 5-4			10.11		
Quadrant 5-5			10.36		

Figures

I:\Ben-Weitsman.6084\50162.80-Steel-Street\Docs\DWG\MXD\Characterization\SITE_LOC.mxd

PLOTDATE: 08/13/13 3:12:56 PM ReidLS

FIGURE 1



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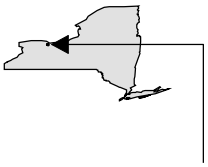
DEBRIS PILE MANAGEMENT
WORK PLAN
80 STEEL STREET
ROCHESTER, NEW YORK



MAP LOCATION

SITE LOCATION

N

0 1,000 2,000 4,000 6,000 8,000

Feet

SEPTEMBER 2013
6084.50162

1:24,000

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FIGURE 2

N

LEGEND

TOTAL PCB CONC. (PPM)

- <25
- >25 BUT <48
- >48
- APPROX. LOCATION OF GAS CYLINDERS
- APPROX. AOC/QUADRANT BOUNDARY

DEBRIS PILE TOPOGRAPHIC CONTOUR

- 5-ft
- 1-ft

SAMPLE LOCATION'S PCB CONC. <25 PPM, SOIL/DEBRIS TO BE TRANSPORTED AS NON-HAZARDOUS WASTE TO WASTE MANAGEMENT MILL SEAT LANDFILL, BERGEN, NY AS DAILY COVER

SAMPLE LOCATION'S PCB CONC. >25 BUT <48 PPM, SOIL/DEBRIS TO BE TRANSPORTED AS NON-HAZARDOUS WASTE TO WASTE MANAGEMENT MILL SEAT LANDFILL, BERGEN, NY AS DIRECT FILL.

SAMPLE LOCATIONS' PCB CONC. >48 PPM, SOIL/DEBRIS TO BE TRANSPORTED AS HAZARDOUS WASTE TO CHEMICAL WASTE MANAGEMENT, MODEL CITY, NY AS DIRECT FILL

NOTES:

1. HISTORIC SAMPLE LOCATIONS FROM AUGUST 2012 AND OCTOBER 2012 ARE NOT DEPICTED AS THE LOCATIONS WERE NOT PROVIDED.
2. BOLDED RESULTS INDICATE A DETECTION ABOVE THE REPORTING LIMIT.
3. GRAY SHADED RESULTS INDICATE THE RESULT EXCEEDS THE TOTAL PCB DETECTED CONCENTRATION THRESHOLD FOR DISPOSAL OF DEBRIS AT THE WASTE MANAGEMENT FACILITY AT MODEL CITY, NEW YORK (> 48 PPM). REFERENCE WASTE MANAGEMENT CORRESPONDENCE JUNE 26, 2013.
4. GRID SHOWN REPRESENTS A 12' X 12' X 12' CUBE. CHARACTERIZATION SOIL SAMPLES WERE COLLECTED AT THE APPROXIMATE CENTER OF EACH CUBE.
5. SAMPLE DEPTHS ARE NOTED AT THE END OF THE SAMPLE ID AND REPRESENT DEPTHS BELOW THE TOP OF THE PILE.
6. AOC = AREA OF CONCERN

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SITE PLAN WITH PROPOSED METHOD OF DISPOSAL BY SAMPLE LOCATION

TRUCK ENTRANCE

TRUCK EXIT

TRUCK ROUTE

TRUCK ROUTE

TRUCK ROUTE

EXISTING ACCESS ROAD

AOC 1

AOC 2

AOC 3

AOC 4

AOC 5

APPROX. LOCATIONS OF STAGED PILES ON POLY SHEETING

PILE 1-8
PILE 1-6
PILE 2-10
PILE 1-9
PILE 1-7
PILE 2-4
PILE 1-1
PILE 2-14

HISTORIC SAMPLES WITH UNKNOWN LOCATIONS

No.1 NW Area

Parameter	Date	Landfill Threshold	Result	Units
Total PCBs	10/11/2012	48.0	**17.21**	mg/Kg

No.2 NE Area

Parameter	Date	Landfill Threshold	Result	Units
Total PCBs	10/11/2012	48.0	**17.87**	mg/Kg

No.3 East NE Area

Parameter	Date	Landfill Threshold	Result	Units
Total PCBs	10/11/2012	48.0	**15.99**	mg/Kg

No.4 South East

Parameter	Date	Landfill Threshold	Result	Units
Total PCBs	10/11/2012	48.0	**18.86**	mg/Kg

No.5 South West Middle

Parameter	Date	Landfill Threshold	Result	Units
Total PCBs	10/11/2012	48.0	**28.40**	mg/Kg

Eddy Current Pile - North

Parameter	Date	Landfill Threshold	Result	Units
Total PCBs	8/9/2012	48.0	**20.60**	mg/Kg

Eddy Current Pile - South

Parameter	Date	Landfill Threshold	Result	Units
Total PCBs	8/9/2012	48.0	**16.84**	mg/Kg

0 12.5 25 50
Feet

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